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STATE OF MISSOURI

PUBLIC SERVICE COMMISSION

In the Matter of the)
Commission's Rule Relating) Case No. GX-2024-0326
to Renewable Natural Gas)
Programs)

In the Matter of the)
Proposed Amendment of the)
Commission's Rule 20 CSR) Case No. GX-2024-0337
4240-10.030 Standards of)
Quality)

TRANSCRIPT OF PROCEEDINGS

Hearing

July 23, 2024

Governor Office Building
200 Madison Street
Jefferson City, Missouri
Volume 1

NANCY DIPPELL, Presiding,
CHIEF REGULATORY LAW JUDGE.

KAYLA HAHN, Chair,
GLEN KOLKMEYER,
JOHN MITCHELL,
COMMISSIONERS.

REPORTED BY:

KELLENE K. FEDDERSEN, CSR, RPR, CCR NO. 838
LEXITAS LEGAL

1 P R O C E E D I N G S

2 (WHEREUPON, the hearing began at
3 10:01 a.m.)

4 JUDGE DIPPELL: Good morning. This
5 is a rule comment hearing in Commission file
6 Nos. GX-2024-0326 and GX-2024-0337. My name's
7 Nancy Dippell. I'm the Regulatory Law Judge
8 presiding over this hearing today.

9 Rule comment hearings are different
10 than our contested case hearings. These hearings
11 are just to take comments on the proposed rule and
12 amendment that is before the Commission. Anyone
13 can comment, and you don't have to be represented
14 by an attorney or anything like that.

15 So normally the rule says that we
16 take comments in favor and then comments opposed,
17 but that doesn't really work very well when we're
18 doing a combined hearing and this type of rule. So
19 we'll just take -- we'll just go through the
20 comments, people will testify or speak as we go,
21 and just ask you to please make it clear which rule
22 that you're commenting on and not -- try not to mix
23 them up too much. The Commission has to summarize
24 all of the comments and respond in their order of
25 rulemaking, and it will be a lot easier if we focus

1 on exactly which provisions or what your
2 suggestions are and which rule they pertain to.

3 I would ask everyone present and
4 those online to make sure those online are muted
5 and those present have muted their devices,
6 silenced or turned off your cell phones and
7 computers and so forth.

8 I have with me currently Chair Hahn,
9 and we may have some other Commissioners joining us
10 along the way. If they aren't able to be here,
11 they'll be reading the transcript. We have a court
12 reporter taking down the transcript as well as this
13 is being recorded and streamed online on our
14 website.

15 Are there any questions before we get
16 started about the procedure? All right. I will
17 just kind of open it up as we go. I'm going to ask
18 if OPC would like to begin just to start us off.

19 MR. CLIZER: Certainly. Were we
20 going to make entries of appearance or is that not
21 necessary?

22 JUDGE DIPPELL: I'll just let you
23 make your entry as you go, say who you are, and if
24 you're here representing someone, say that. Be
25 sure that you do speak into the microphones and

1 that you speak slowly so the court reporter can get
2 everything down. Go ahead, Mr. Clizer.

3 MR. CLIZER: Thank you. John Clizer
4 on behalf of the Missouri Office of the Public
5 Counsel. My contact information has been given to
6 the court reporter.

7 So to start, we filed written
8 comments. Just before this hearing began Staff
9 distributed a list of sort of the feedback it had
10 gotten for all of the comments that were received.
11 In general, the OPC agrees with all the feedback
12 related to its comments. I feel like our written
13 comments were fairly self-explanatory, so I won't
14 dwell on them very long here.

15 It appears that Staff's okay with the
16 written suggestions we made to 0326, and with more
17 understanding as provided by Staff, I think we are
18 okay with the issue that we had addressed in
19 0327 -- or sorry, 0337. So I don't really want to
20 dwell on that very much.

21 I'm going to touch on some of the
22 comments that were introduced by other parties in
23 the case, and I will try and go as quickly as
24 possible. I ask the court reporter to please yell
25 at me if I go too quickly. That sometimes happens.

1 So I'm going to start with 0326 and
2 the comments by Summit, and I'm going to refer to
3 these points as the points in the numbered
4 paragraphs in their filing.

5 So in their first point they asked to
6 broaden the definition of hydrogen. We at the OPC,
7 we oppose the request to change for two reasons.
8 First, Summit's proposal would allow nonrenewable
9 sources of hydrogen to be included in the renewable
10 natural gas program.

11 In particular, it would allow
12 hydrogen produced through the steam reformation of
13 methane to be called renewable even though this is
14 not a renewable process and, in fact, produces high
15 levels of CO2 emissions.

16 The second point, which is perhaps
17 more important, is that Summit's proposal would
18 create confusion as it would create an ambiguity of
19 when hydrogen is considered renewable. Under the
20 proposal, hydrogen from any source would be
21 considered renewable unless the hydrogen was mixed
22 with biogas, at which point it would have to come
23 from a renewable source to be considered a
24 renewable natural gas. And the idea that the
25 hydrogen's renewable nature changes whether or not

1 it's mixed with biogas is a very odd conclusion
2 that I would suggest you should not allow.

3 So while I think that what they have
4 proposed is consistent with the statute, I think
5 that keeping with the spirit of the statute what
6 Staff has proposed is a more correct interpretation
7 for a rulemaking perspective.

8 Point 2, they suggested the RNGRAM be
9 made annually. We just wanted to point out that
10 the proposed rule already restricts it to being
11 updated once a year, so we think that's redundant
12 and unnecessary.

13 Point 6 required customer information
14 regarding the difference in heat value for hydrogen
15 gas, and Summit wanted clarification for why that
16 is. And while I'm sure that the Staff will provide
17 clarification, the Commission -- OPC wanted to make
18 sure the Commission, utilities and customers
19 understand that hydrogen and natural gas, which is
20 primarily methane, are very different beasts.
21 Hydrogen's adiabatic flame temperature, which is
22 the temperature reached by a flame under ideal
23 conditions, is more than 200 degrees hotter than
24 methane, and its flame speed is more than four
25 times higher than methane.

1 What that means is that most
2 appliances such as furnaces, hot water heaters and
3 stoves will need to be significantly altered to run
4 off pure hydrogen. So it's important for customers
5 to have that understanding if, you know, the
6 utilities were to move towards more of a
7 hydrogen-rich fuel source.

8 There's also another significant
9 point that I wanted to bring up here that's
10 tangentially related to this, and that's the
11 problem of hydrogen embrittlement. So hydrogen
12 embrittlement is also known as hydrogen-assisted
13 cracking or hydrogen-induced cracking. It refers
14 to the loss of ductility and ultimately pipe
15 failure caused by metal pipe's absorption of
16 hydrogen gas.

17 This has the potential to become a
18 massive problem if hydrogen gas is introduced into
19 a gas utility's methane supply as many houses use
20 metal pipes inside the home, and many of the actual
21 appliances that use hydrogen gas will also have
22 metal components.

23 So customers need to be made aware of
24 the potential danger that hydrogen gas could pose
25 to their home as the gas could cause either

1 breakdown of the appliances or the pipes inside the
2 house itself, and this could lead to significant
3 damage, internal gas leaks and even possibly
4 catastrophic failures.

5 By just way of anecdote, I would
6 point out that a couple years ago Missouri-American
7 Water faced a class action lawsuit for effectively
8 hard water problems on its system in the Parkfield
9 area. This is another situation where you could
10 possibly see that same kind of thing. If customers
11 aren't made aware or if the gas, hydrogen amount in
12 the gas is too high, you could see it actually
13 begin to potentially damage people's appliances
14 possibly, which could lead to future litigation.

15 So it's just something I wanted to
16 kind of put out there and make sure people are
17 aware of moving forward as we discuss the use of
18 hydrogen in renewable natural gas systems.

19 So with regard to 0337, Spire really
20 had one point which was the questioning that
21 needed -- I'm sorry. Summit had one point which
22 was questioning the need for monitoring given the
23 third-party monitoring already done by natural gas
24 producers.

25 And here we just want to point out

1 that subsection 12 of that rule requires the
2 utilities to install an isolation device which
3 allows them to cut off the supply of RNG to their
4 main pipe system. And as long as you're going to
5 require that isolation device to be there, which
6 the OPC supports, utilities need to be having the
7 monitoring capable to know when to trigger it.

8 So relying on third-party monitoring
9 poses a problem because you're relying on a third
10 party to tell you when to trip your isolation
11 device, or alternatively I guess the utilities
12 could hand control of the isolation device to the
13 third parties, but that would be probably even more
14 problematic.

15 So while I think that I respect their
16 concerns that that's going to create duplicative
17 costs, the need to ensure that you're properly
18 monitoring for that isolation device we think would
19 trump that.

20 So moving on to the comments made by
21 Spire Missouri, and I'm going to go back to 0326
22 rulemaking. The first point they raise was a
23 request for clarification on whether CCNs are
24 required. I think that this is going to
25 potentially be a contentious issue moving forward,

1 but I wanted to lay out that, as far as right now,
2 there's no need for a clarification of the rules
3 because I don't think the rule requires a CCN. I
4 might be wrong on that. But the OPC wants to
5 express its position that a CCN would be required
6 for gas utilities building gas generating facility
7 by way of an analogy to the legal precedent
8 concerning electric generating facilities.

9 So some background. Right now we
10 have case law that requires electric utilities who
11 build a generating facility inside their own
12 footprint to request a CCN from the Commission, and
13 we think building a gas generating facility like a
14 biogas system would require that same level of
15 application just by way of analogy.

16 Point 3 raised by Spire was allowing
17 more than just renewable identification numbers, or
18 RINs. We completely support this. To the extent
19 that we can monetize renewable natural gas as much
20 as possible, we want that monetized as much as
21 possible because that supports both the program and
22 ultimately the customers. And I think that Staff
23 has already made a change that also moves towards
24 allowing more than just RINs. So we again support
25 that.

1 Point 5 requested clarification
2 regarding the cost of capital components, and we
3 think that this is unnecessary at this stage
4 because all the rule is really requesting is that
5 the company identify what capital components,
6 meaning cost of capital, capital structure,
7 et cetera, they used in their application.

8 I don't think that the Staff -- I do
9 not believe at this point in time that the
10 Commission needs to make a determination on what
11 the proper capital structure would be in any given
12 case. The rule itself just says you have to tell
13 us what you used when you made the application, and
14 for that purposes, that's fine.

15 The same sort of goes for Point 6.
16 Again, they requested clarification on the billing
17 methodology. We think that the rule just says you
18 have to say what billing methodology you used when
19 you filed the application. There's no need for
20 clarification at this time.

21 Point 7A is one of the more larger
22 issues that I'd like to direct the Commission's
23 attention to because it concerns the issue of a
24 prudence review, and to my knowledge I don't think
25 Spire requested an actual change, but it is

1 something that we really want to consider moving
2 forward here because what Spire appears to be
3 insinuating, and I apologize if this is not the
4 case, is the rate case prudence review should be
5 disfavored or else held to a higher standard
6 because the Commission will have an opportunity to
7 review the prudence of RNG projects multiple times
8 before then.

9 And the problem the OPC sees with
10 that is that we're not entirely clear when other
11 parties do get to challenge the prudence of a
12 program.

13 So at a broad level right now
14 there's, I would say, four times theoretically that
15 you can consider prudence. You have the RNG
16 program application. You have a CCN application,
17 if it's necessary, and that's an open question.
18 You have the RINGRAM, which is the inter-rate case
19 recovery mechanism, and you have a general prudence
20 review.

21 The past Commission precedent up to
22 this point has said that there's no prudence
23 evaluation for a CCN. So if we don't change that,
24 that one's off the table.

25 The RINGRAM is based on the ISRS

1 mechanism which also doesn't have a prudence
2 evaluation as part of the case itself. The
3 prudence evaluation comes later in the rate case.

4 So that theoretically leaves really
5 just the RNG application for the program as a
6 whole. Okay. The problem there becomes how much
7 information are we getting and how committed is the
8 utility to what's in that program. Because the way
9 that the statute is drafted, it suggests that the
10 program requires you to identify what you might use
11 to secure the renewable natural gas, but that could
12 be subject to change.

13 And, in fact, if situations change
14 between when the application for the program was
15 approved and when they actually go to build plant,
16 we might want them to change. There's a scenario,
17 for example where the company might come in for the
18 application and say, hey, we can procure natural
19 gas by building this plant that will cost -- just
20 going to throw out numbers -- 5 million annually
21 and produce revenues in excess of 6 million. OPC's
22 going to get behind that, right? That's producing
23 positive revenues.

24 But if when it comes time to actually
25 build that you've had some change in circumstances,

1 for example, let's say new tariff comes down on
2 steel and that raises the price, so now it's
3 8 million annually to build. At that point in time
4 you would want the company to reassess.

5 So just having a prudence evaluation
6 as part of the RNG application process doesn't
7 really get to those kinds of concerns.

8 I think that if the Commission were
9 to move toward the position where they wanted to
10 ensure the company had a commitment that things
11 were prudent before they put steel in the ground,
12 the best course of action would be effectively to
13 require a CCN and then to include prudence
14 evaluations directly as part of that CCN.

15 I'm not advocating that's necessarily
16 the best way to go, but if that was the Commission,
17 the way the Commission wanted to go, that would be
18 the best avenue for it.

19 So again, at a broader level I just
20 wanted to lay out there that as of right now it's
21 not entirely clear when exactly the Commission
22 expects other parties to bring prudence challenges
23 to an RNG program, and we would just like
24 clarification on that given sort of the comments
25 made by other parties.

1 I'm going to move on. In 7B, the
2 company points out a contradiction or apparent
3 contradiction in the rules. The OPC agrees. There
4 does appear to be a contradiction there. It
5 appears that what from our perspective Staff was
6 asking for was effectively that, in the event of a
7 disallowance, it would be recovered in the next
8 RINGRAM but only over a six-month period.

9 We think that's doable if that's what
10 Staff intended. I haven't had a chance to go
11 through their handout yet to make sure. We think
12 that can be accomplished with a simple change, but
13 I'll let Staff address that.

14 Point 7C, there was a -- whether or
15 not we should be using the company-specific
16 short-term debt for calculations of the RINGRAM. We
17 do believe that using the specific short-term debt
18 is the best way to reflect the actual capital costs
19 incurred on a company-by-company basis.

20 However, to the extent that the
21 Commission did want to move to something more
22 generic, instead of the prime minus two or the plus
23 two -- no. Yeah. Instead of prime minus two the
24 company suggests, we would suggest using Standard &
25 Poor's A2 or Moody's P2 30-day commercial paper

1 rate as a better substitute for short-term debt
2 costs than prime minus two.

3 Point 9, the revenue sharing
4 requirement for the sale of renewable attributes.
5 There is a slight bit of confusion on our end
6 regarding what Spire is proposing here. The cost
7 of renewable natural gas, as in the actual
8 molecules of gas that are purchased, we think that
9 should flow through the PGA. If Spire or another
10 utility intends to buy renewable attributes
11 divorced from the gas, we don't think that that
12 should properly flow through the PGA.

13 We think that that can be recovered
14 through the RNGRAM to be recovered in the general
15 rate case. We're not opposed to recovery, but we
16 think the PGA should remain pure for just the
17 recovery of molecules of actual gas. So to the
18 extent that they're proposing to flow through the
19 cost of purchasing renewable attributes divorced
20 from natural gas, we disagree that that should flow
21 through the PGA. Keep the PGA clean.

22 There's a second part to Point 2.
23 That was the second part. Apologies. The first
24 part was regarding the sharing of renewable
25 attributes, and this really goes specifically, I

1 think, to a project that Spire has currently in the
2 works and they kind of discuss regarding the city
3 of Kansas City.

4 We do not agree that the Commission
5 should make the change proposed by Spire that would
6 allow the company to share the RNG attributes as
7 part of the base rules. First, we think this
8 inhibits the cost effectiveness of these programs
9 for Spire's customers by denying the full value of
10 the capital investments that they pay for. It
11 also, therefore, results in Spire customers
12 subsidizing the other entities, such as the city of
13 Kansas City in their example.

14 We also think it encourages utilities
15 to use the sale of RNG attributes to crowd out
16 competition against private RNG producers in an
17 abusive manner. In other words, it allows the gas
18 utilities to utilize their position as regulated
19 monopolies in an unfair manner in the competitive
20 marketplace.

21 We do note, however, that in the
22 specific case that Spire is talking about, the
23 company could also ask for a waiver from the rule
24 if they adopt -- if the Staff's -- if what is
25 currently proposed is adopted. So our

1 recommendation is to not make the change that they
2 propose, but if Spire feels strongly enough, that
3 they should request a waiver when they come for the
4 application of that particular project.

5 Finally, with regard to Point 10,
6 they discuss the RINGRAM timeline. They talk about
7 limiting it effectively to the same timeline used
8 for the ISRS. Again, the OPC would oppose this. I
9 have worked ISRS cases. I know Judge Dippell has
10 seen ISRS cases that have gone to hearing. They
11 are not fun when they become contested cases at
12 hearing because they get very squirrely.

13 I would strongly recommend that the
14 Commission not apply a time frame to this and
15 prevent parties from having to resort to things
16 like live testimony. It is just not a good time.

17 I believe Spire's comments with
18 regard to the second Rule 0337 are pretty much in
19 line with what I've already said regarding Summit.
20 Again, the whole third party monitoring thing is
21 necessary for the isolation cutoff. And the only
22 other person I think I saw who made comments
23 besides the one gentleman was Roeslein.

24 MR. COOPER: Roeslein.

25 MR. CLIZER: Roeslein. I am so

1 sorry. I can't pronounce that correctly for some
2 reason.

3 And again, they basically said that
4 they wanted an increase to the number of ways that
5 you could monetize the RNG attributes, and we fully
6 support that.

7 In general, the OPC is on board with
8 the idea of renewable natural gas to the extent
9 that we can produce meaningful benefits to Missouri
10 customers in the form of cost effective, profitable
11 endeavors. So we are looking forward to the
12 utilities putting forward programs that intend to
13 make more than they would otherwise cost. I think
14 Roeslein has shown that that's a possibility, that
15 that's something that can be done. So we are
16 looking forward to their applications.

17 I know that was lengthy, and thank
18 you very much for your time. I would also request,
19 to the extent that anybody else wants to respond to
20 our issues, that I get a chance to come back if
21 necessary, but otherwise I'm done. Thank you.

22 JUDGE DIPPELL: All right. Thank
23 you, Mr. Clizer.

24 Did you have any questions,
25 Chair Hahn? And I see Commissioner Kolkmeyer has

1 joined us online. Commissioner, if you have any
2 questions, just feel free to jump in.

3 COMMISSIONER KOLKMEYER: Okay. Will
4 do. Thank you.

5 JUDGE DIPPELL: All right.
6 Mr. Clizer referred to Staff's summary, and when
7 Staff gives its comments it's going to present an
8 exhibit where they did a summary. So for those of
9 you online, that's what Mr. Clizer was referring
10 to, and we'll make sure that that gets put in the
11 record and you'll be able to refer to it.

12 But for now we're going to save Staff
13 for later and just go ahead with the next
14 commenter, and I'll just start with the counsel
15 tables here in the front. Is there -- are there
16 comments?

17 MR. BOUSELLI: This is Spire, Eric
18 Bouselli with Spire.

19 JUDGE DIPPELL: Is your microphone
20 on? There you go.

21 MR. BOUSELLI: This is Eric Bouselli
22 with Spire. I believe I gave my card up there
23 earlier, so you have my contact information.

24 JUDGE DIPPELL: Just make sure when
25 you talk you talk into that microphone.

1 MR. BOUSELLI: All right. Thank you.
2 First, Spire would like to thank the Commission and
3 its staff for furthering the process to support
4 renewable energy development and use in the state
5 of Missouri, and I'd much like to echo the Office
6 of Public Counsel's comments that Staff did a good
7 job synthesizing the information and comments
8 gathered in GW-2022-60 and brought forward a solid
9 draft of rules relating to utilities offering
10 renewable natural gas programs.

11 Spire submitted comments on July 17th
12 to the two dockets in question today, and we didn't
13 really have any comments that were in opposition to
14 any of the proposed rules for the RNG program.
15 Rather our comments down to three general
16 categories.

17 The first was just a request for
18 clarification on intent of what Staff might be
19 looking for to make sure we can provide the
20 information that they need to properly regulate,
21 any verbiage tweaks for clarity and consistency
22 purposes we threw out there, and then we did have a
23 couple suggested changes.

24 And while we have received the
25 comments that Staff provided to everybody this

1 morning, we're still kind of working through them,
2 but we'll have a few comments we can address as
3 well today.

4 So first, I'd like to address -- let
5 me find the section here real quick. OPC had a
6 comment on, I guess, 40.100(1)(D) that kind of
7 specifies what's included in the -- and allowed to
8 be recovered under an RNGRAM. Initially it just
9 included prudently incurred costs in the pass
10 through of benefits and savings. OPC kind of added
11 some verbiage related to capital depreciation and
12 applicable taxes.

13 And Spire just wants to note that for
14 projects that involve production or even
15 interconnects, there are also operating expenses
16 associated with those. So this differs from a
17 traditional ISRS project where we just -- we focus
18 primarily on capital, depreciation and taxes, but
19 when you're operating a facility there could be
20 varying levels of expenses that are incurred to
21 generate that gas that is then provided to
22 customers.

23 Additionally, for -- to comment on
24 the CCN section -- let me go find that here real
25 quick. I think that was 400 -- or 40.100(2).

1 Looking at Staff's comments, it looks like the
2 proposed rule require the utility to apply for a
3 CCN for each RNG infrastructure. I think if a CCN
4 will be required for each type of investment, we
5 probably want to echo agreement with the OPC's
6 thoughts where maybe it should be limited to
7 production-type assets because those would require
8 additional investment and other factors that could
9 potentially need to be considered versus as
10 interconnect type investment.

11 I think the definition of RNG
12 infrastructure was sort of broad where it included
13 production interconnection and I think some
14 pipeline. So there's just different degrees of
15 potential investment that could be brought forward
16 in an RINGRAM, but they all might not kind of fall
17 to that higher investment category that a
18 production asset might be. So if the CCN is to be
19 required, we think it should be limited to those
20 production type assets.

21 Sorry. I'm skimming through the
22 Staff's comments real quick to see if there's
23 something that we want to get out today.

24 And I think we seem to be on a roll
25 agreeing with the OPC on quite a few things today,

1 but we do think there's kind of a clear delineation
2 on where the cost of gas for a procurement type of
3 transaction should go, and we do think that should
4 flow through the existing cost recovery mechanism
5 of the PGA.

6 And then we might have slightly
7 differing thoughts on any RNG attributes that could
8 be purchased in an offtake-type agreement
9 situation. We think those could be consideration
10 for passing through the PGA and any revenues could
11 go towards offsetting that explicitly. So we think
12 the PGA could be a natural landing spot for that as
13 well for those non-investment type of activities
14 which we think fit naturally into an RNGRAM, but
15 that could be something we could explore further.

16 I think that kind of summarizes the
17 bigger comments that we want to make sure we get
18 addressed today with you. Again, I just want to
19 thank the Commission and staff for doing a great
20 job kind of synthesizing and working through the
21 feedback that was provided earlier.

22 JUDGE DIPPELL: Thank you. Are there
23 any Commission questions? All right. Thank you
24 very much for your comments. Are there -- wait a
25 minute.

1 CHAIR HAHN: It may be helpful. When
2 the Staff was conceptualizing this rule, we call it
3 an R-N-G-R-A-M, we call it RNGRAM. So that's kind
4 of how we're sounding out the acronym. That might
5 help you give your comments.

6 JUDGE DIPPELL: Mr. Cooper.

7 MR. COOPER: Thank you, Judge. As
8 was mentioned before, Roeslein Alternative Energy
9 Services provided brief comments last week in this
10 matter. I just wanted to take first a few minutes,
11 it may not even be a few minutes, but to provide a
12 little background as to who Roeslein is and what
13 they're doing at this point in time.

14 The mission of Roeslein is to
15 discover and implement alternative biomass energy
16 solutions with the goal of restoring millions of
17 acres of grasslands on marginal land throughout the
18 Midwest region.

19 Roeslein Alternative Energy, which is
20 an affiliate of RAES, creates renewable natural
21 gas, pipeline quality natural gas produced from
22 organic inputs and natural processes. After this
23 production and processing, RAES gathers this RNG to
24 a point where it may be compressed and injected
25 into a transmission pipeline.

1 And, in fact, Roeslein Alternative
2 Energy and RAES currently produce biogas in
3 Missouri that is injected into the A&R Pipeline,
4 which is an interstate pipeline under the
5 jurisdiction of the FERC.

6 Returning briefly to the comments,
7 RAES is generally in support of both of the
8 proposed rules that are the subject of this hearing
9 today. In terms of the specific item that RAES had
10 commented on, the 20 CSR 4240-40.100(2)(I), we had
11 a chance to see the proposal of Staff in the
12 document that I understand will be marked later
13 today where Staff proposes to change that to say
14 all prospective sales of RNG attributes, and that
15 change is acceptable and Roeslein believes that
16 will address its concern.

17 On the WebEx today is Mr. Tim
18 Johnston, who's the vice president of Roeslein
19 Alternative Energy. He is the person who signed
20 the company's comments, and I believe that he has
21 one comment that he would like to add at this time,
22 your Honor, if we could do that.

23 JUDGE DIPPELL: Certainly.
24 Mr. Johnston, are you able to join us?

25 MR. JOHNSTON: Yes, ma'am, I believe

1 I am.

2 JUDGE DIPPELL: Okay. We can hear
3 you just fine. Go ahead with your comment.

4 MR. JOHNSTON: I just wanted to make
5 a comment about one of Mr. Clizer's comments
6 regarding renewable hydrogen. In the set EPA set
7 rule that was passed, I think, about a year ago
8 that went into operation shortly -- or just
9 recently, they changed the definition for renewable
10 hydrogen to include not just hydrogen produced from
11 electrolysis of water using renewable electricity
12 but also to include hydrogen produced by steam
13 reformation of renewable natural gas.

14 I'd just like to have the comments
15 reflect that -- our comments reflect that we would
16 like to see renewable hydrogen, the definition
17 accepted by the Commission include renewable
18 hydrogen produced from renewable natural gas
19 through steam reformation processes.

20 JUDGE DIPPELL: Okay. Thank you very
21 much. Did you have further comments, Mr. Cooper?

22 MR. COOPER: I do not.

23 JUDGE DIPPELL: Okay. Are there any
24 questions from the Commission? And Commissioner
25 Mitchell has also joined us. I don't see any.

1 Thank you very much for your comments.

2 MR. JOHNSTON: Thank you very much.

3 JUDGE DIPPELL: Okay. Are there
4 others in the gallery that wish to comment? If so,
5 I'd ask you to come to the podium. Wave at me if
6 there's -- is there anyone else on the WebEx? I
7 don't believe so.

8 Okay. Well, Staff do you want to
9 give your comments? Thank you.

10 MR. STACEY: Thank you, Judge. Good
11 morning. This is Scott Stacey. I represent Staff.
12 I gave my business card to the court reporter. May
13 it please the Commission?

14 Staff is in support of these rules
15 20 CSR 4240-40.100, which is the new RNG rule, and
16 20 CSR 4240-10.030, the gas quality standards rule.
17 They're also set forth in GX-2024-0326 and 0337.

18 Staff reviewed all written comments
19 submitted by OPC, Roeslein, Summit, Spire and
20 Mr. Ted Christensen. Staff responded to these
21 comments as outlined in the document I handed out
22 previously, and at this time Staff moves to admit
23 that document as Staff's Exhibit No. 1 into
24 evidence.

25 JUDGE DIPPELL: Thank you. And we

1 don't have formal evidence, but I appreciate you
2 bringing that. So I will admit Exhibit No. 1.
3 I've marked it as Exhibit No. 1, and we'll put that
4 in the record as part of Staff's comments.

5 (STAFF'S EXHIBIT 1 WAS ADMITTED INTO
6 EVIDENCE.)

7 MR. STACEY: Thank you, Judge. Staff
8 plans on addressing these comments within the final
9 rulemaking as well. My plan is to go through
10 Staff's comments, and if you have any questions
11 regarding those comments, there are a few Staff
12 members present that may address your questions:
13 Jim Busch, Claire Eubanks, David Sommerer and
14 Robert Clay.

15 OPC submitted a comment under
16 20 CSR 4240-40.100(4)(D). The current text states:
17 Prudence reviews respecting a RNGRAM. A prudence
18 review of the costs subject to the RNGRAM shall be
19 conducted no less frequently than at intervals
20 established in the commission proceeding in which
21 the RNGRAM is established.

22 The proposed text: Prudence reviews
23 respecting -- or a prudence review of the costs
24 subject to the RNGRAM shall be conducted no less
25 frequently than once a year, unless the Commission

1 orders otherwise during proceeding in which the
2 RNGRAM is established.

3 Staff is not opposed to this
4 modification that was submitted by OPC.

5 The next one is 20 CSR
6 4240-40.100(1)(D). The proposed text submitted by
7 OPC is: Renewable natural gas adjustment mechanism
8 means a mechanism that allows periodic adjustments
9 to recover prudently incurred capital costs,
10 depreciation expense, and applicable taxes.

11 And again, Staff is not opposed to
12 this modification.

13 CHAIR HAHN: Mr. Stacey, if you
14 wouldn't mind pausing for just one moment.

15 MR. STACEY: Sure.

16 CHAIR HAHN: It might be helpful
17 after each one, if any of the companies have
18 modifications or feedback on a particular one, to
19 just ask to offer those comments just to make sure
20 we understand the parties' position on each of the
21 recommendations.

22 MR. STACEY: Sounds good.

23 MR. DANDAMUDI: Commissioner.

24 JUDGE DIPPELL: Yes. Go ahead.

25 MR. DANDAMUDI: Judge, are we

1 supposed to make those comments now as Chair

2 Hahn --

3 JUDGE DIPPELL: I think Chair Hahn is
4 saying it might be a little easier to have it as a
5 discussion at this point. In each of Staff's
6 comments, if someone has a remark that they would
7 like to make, then we could do that now. Did you
8 want to respond? Just be sure and identify
9 yourself.

10 MR. BOUSELLI: This is Eric Bouselli
11 with Spire again. And I believe in my initial
12 comments after doing a quick skim through, this is
13 one of those items where we believe the initial
14 language of, I don't want to call it generic, but
15 the incurred costs recognizes that there are both
16 capital and operational expenses that could be
17 associated with costs that could be brought forward
18 in a RNGRAM.

19 So we just want to maybe oppose the
20 modification to kind of explicitly limit it to the
21 capital costs, depreciation expense and applicable
22 taxes. Those will for sure be considered, but
23 there are also those additional operating costs for
24 facilities that should be recoverable as well.

25 JUDGE DIPPELL: And Mr. Clizer, you

1 had a response?

2 MR. CLIZER: Yes. The OPC actually
3 believes that those operating expenses can't be
4 recovered through the RNGRAM due to the statutory
5 language. Specifically under subsection 5 of the
6 statute, which I will identify for the record is
7 386.895, any costs incurred by a gas corporation
8 for a qualified investment that are prudent, just
9 and reasonable may be recovered by means of an
10 automatic rate adjustment mechanism.

11 However, qualified investment is
12 defined as any capital investment in renewable
13 natural gas infrastructure. I'm not going to read
14 the rest of it.

15 My point here is that, according to
16 the language that we interpret it, only capital
17 investments can actually be recovered through the
18 RNGRAM, which is why we believe it would be
19 restricted to the capital cost, depreciation
20 expense and applicable taxes which we reflect would
21 be returns of -- sorry -- recovery of the capital
22 investment.

23 I want to specify, though, that
24 ultimately operation and maintenance expenses would
25 be recovered. They would just be recovered as part

1 of a general rate case, as would any other
2 operation and maintenance expense normally be.

3 There is -- I'm double checking
4 myself right now, but I don't think there's any
5 existing intermittent rate mechanism that requires
6 recovery of an operation and maintenance expense.
7 I'm sure somebody will jump up and explain to me
8 why I'm wrong.

9 But based on the statutory language,
10 we don't believe that those should be included
11 here, though we do recognize the company will
12 absolutely be allowed to recover those as long as
13 they are prudently incurred as part of a general
14 rate case.

15 JUDGE DIPPELL: Are there any other
16 comments or questions about that part? I'm going
17 to pause while some people in the gallery are
18 conversing to make sure there's not any additions.
19 Mr. Cooper.

20 MR. COOPER: Judge, I apologize. I
21 was just asking if Staff could e-mail me this
22 document so I could send it on to Mr. Johnston
23 since you're doing the comments in the hearing.

24 JUDGE DIPPELL: Anything else on that
25 point?

1 MR. DANDAMUDI: Your Honor, I didn't
2 introduce myself earlier to the court reporter.
3 Sreenu Dandamudi with Spire. And we did have one
4 more comment on that.

5 MR. BOUSELLI: This is Eric Bouselli
6 with Spire again. And the legislation, as
7 Mr. Clizer pointed out, does mention the recovery
8 of all costs associated with it. So while there
9 might be a capital investment, there could be other
10 costs related to the capital investment that we
11 think should be brought up for recovery. Because
12 depending on the timing cycle of when a company's
13 rate case might be, there could be significant
14 additional O&M costs that could prohibit the
15 pursuit of some of these projects and bringing of
16 that renewable energy to Missouri customers, and
17 they could be perfectly prudent projects that does
18 bring real benefits in a cost effective manner, but
19 not allowing the recovery or the delayed recovery
20 of some of those higher O&M expenses could impact
21 the ability or the desire for some of these
22 projects to come to fruition.

23 And yes, those costs would be
24 reflected in a general rate case, and that would be
25 reset to zero per the rules. So there is that path

1 to get those eventually, but depending on the
2 timing of rate cases, it could impact the ability
3 of some of these projects to move forward from a
4 public utility perspective.

5 JUDGE DIPPELL: Mr. Clizer, did
6 you --

7 MR. CLIZER: It's a matter of
8 statutory interpretation, and I reflect that the
9 Commission will have to dwell on it.

10 Really more than anything I just want
11 to point out that the next change is the exact
12 same. So unless there's a reason to, I don't think
13 we have to touch the second one the Staff has on
14 there. Just move on from that. I think
15 everybody's said their piece.

16 JUDGE DIPPELL: All right. Is there
17 agreement, then, with Staff moving on to the next
18 point? All right. Go ahead, Mr. Stacey.

19 MR. STACEY: Thank you, your Honor.
20 20 CSR 4240-10.030, which is under GX-2024-0337,
21 comment 1, recommendation: The rule refers to
22 manufactured gas, which is not defined in the rule.
23 OPC recommends providing a definition or removing
24 the term.

25 Staff's reaction is: The term

1 manufactured gas is currently in Sections 10, 11,
2 12 and 15 of 20 CSR 4240-10.030 Standards of
3 Quality which are being amended. Staff also notes
4 that 386.250, Revised Missouri Statutes refers to
5 the manufacture, sale or distribution of gas,
6 natural and artificial, and the Commission's
7 pipeline safety standards in 20 CSR 4240-40.030
8 address safety requirements for pipelines
9 transporting manufactured gas.

10 As background, historically
11 manufactured gas referred to a gas produced gas
12 from coal or oil by heating the material in a
13 nearly oxygen free environment to break it down to
14 volatile components. The gas created from these
15 volatile components was used as fuel for lighting
16 and later for cooking and heating.

17 Gas manufacturing was commonplace in
18 Missouri from about 1860 until 1940. When
19 interstate pipelines brought natural gas to the
20 state in the 1930s, gas manufacturing waned and
21 then ended. However, with the current push towards
22 alternative fuel sources, Staff anticipates there
23 could be a return to similar or alternative means
24 of manufacturing gas for use as fuel.

25 To the extent that such gas may be

1 introduced into natural gas distribution systems,
2 Staff does not see any reason to eliminate the
3 standards for gas quality of manufactured gas.

4 Plus, we don't believe that we need
5 to eliminate it or define it as an industry term
6 but, if required, it is possible we can make a
7 definition for that. Any questions?

8 JUDGE DIPPELL: Are there any
9 additional comments based on that point?

10 MR. CLIZER: We agree with everything
11 he said about what manufactured gas is. That makes
12 sense. And I guess I just didn't know. I feel
13 like it would have been helpful to have a
14 definition. That was it.

15 JUDGE DIPPELL: Any other comments?
16 All right. Go ahead, Mr. Stacey.

17 MR. STACEY: Thank you, Judge.
18 20 CSR 4240-10.030, again GX-2024-0337, comment 2.
19 The second issue concerns the fact it is not clear
20 whether the rule fully contemplates the use of
21 hydrogen gas, which is included in the definition
22 of renewable natural gas referenced in the rule.
23 Because hydrogen gas has substantially different
24 chemical properties when compared to what is
25 commonly known as natural gas, which is primarily

1 composed of methane, there's significant questions
2 whether the requirements, including heating value,
3 are intended to refer to just natural gas, hydrogen
4 gas, or some combination of the two.

5 OPC recommends the Commission
6 consider modifying this rule to more specifically
7 state what, if any, quality standards are effected
8 or applicable to hydrogen gas in its final rule.

9 The basis of Staff's proposed limits
10 was a review of the FERC tariffs for the ten
11 interstate natural gas pipeline operators
12 delivering natural gas to Missouri. Four out of
13 the 10 limit hydrogen to 400 parts per million as
14 proposed by Staff, and another specifies trace
15 amounts.

16 Staff believes that the limit of 400
17 parts per million maximum hydrogen is appropriate
18 for renewable natural gas products that are
19 intended to be a direct substitute for natural gas.

20 As OPC notes, 20 CSR 4240-40.100
21 allows a utility's renewable natural gas program to
22 potentially include hydrogen gas presumably at
23 levels greater than those currently listed in
24 20 CSR 4240-10.030(10)(E) as currently proposed.

25 However, 20 CSR 4240-40.100 also

1 requires that this be considered on a case-by-case
2 basis. Staff anticipates that if any such projects
3 are proposed and approved, specific limits for the
4 volume of hydrogen that may be blended with natural
5 gas will be specified in the approval. Staff
6 accounted for this possibility in the "unless
7 otherwise ordered by the commission" language it
8 proposed in subparagraph 10.

9 As such, unless otherwise ordered by
10 the Commission, all gas, including manufactured gas
11 and RNG delivered to customers in the state other
12 than gas that is delivered on an interstate natural
13 gas pipeline subject to the jurisdiction of FERC,
14 or Federal Energy Regulatory Commission, shall
15 conform to the following specifications.

16 JUDGE DIPPELL: Thank you. Are there
17 any comments about that? Go ahead, Mr. Stacey.

18 MR. STACEY: Thank you.
19 20 CSR 4240-40.100. This involves Roeslein's
20 comments on GX-2024-0326, paragraph 2. The current
21 text says: All prospective sales of renewable
22 identification numbers for RNG. Proposed text was:
23 All prospective sales of renewable identification
24 numbers for RNG or other sales for RNG credit.

25 Staff's position is, change is

1 unnecessary. The existing language is broad enough
2 to consider during an application for approval of
3 the program. However, we have some alternative
4 language that Staff could amend, and that would be
5 all prospective sales of RNG attributes.

6 JUDGE DIPPELL: Are there any
7 comments to that?

8 MR. COOPER: Only as I stated
9 earlier, that Roeslein would support that
10 alternative language that Mr. Stacey just
11 described.

12 JUDGE DIPPELL: Thank you,
13 Mr. Cooper. Mr. Clizer?

14 MR. CLIZER: As would the OPC. We
15 support the alternative language.

16 JUDGE DIPPELL: Thank you.

17 MR. BOUSELLI: Spire supports that as
18 well.

19 JUDGE DIPPELL: Thank you. All
20 right. Mr. Stacey, go ahead.

21 MR. STACEY: Thank you, Judge.

22 20 CSR 4240-40.100(1)(C)(2). The
23 current text is: Hydrogen gas that is derived from
24 electrolysis of water using renewable electricity
25 or.

1 Proposed language is: The current
2 definition excludes other hydrogen production
3 methods such as steam, methane, photobiological,
4 fermentation and others.

5 Summit proposes a broader definition
6 be implemented to be inclusive of other methods of
7 hydrogen production.

8 Staff recommends no change be made to
9 the rule at this time. As additional renewable
10 hydrogen production methods become feasible,
11 parties may propose a modification to this rule.

12 JUDGE DIPPELL: Chair Hahn, you had a
13 comment?

14 CHAIR HAHN: A question. Earlier in
15 testimony Mr. Johnston through the WebEx mentioned
16 that this RNG definition should match the federal
17 definition. Does Staff have feedback on that
18 suggestion, and has Roeslein provided that federal
19 definition to Staff?

20 MR. COOPER: We have not. From
21 Roeslein's perspective, that arose today during the
22 hearing. We certainly can, but I can't say that we
23 have at this point.

24 CHAIR HAHN: Okay.

25 MR. STACEY: Just a moment, please.

1 Staff would like to have time to review the
2 definition.

3 CHAIR HAHN: Thank you.

4 JUDGE DIPPELL: Mr. Clizer, go ahead.

5 MR. CLIZER: First of all, I do want
6 to respond a little bit. I think that he's
7 absolutely correct. The steam reformation of
8 biogas, which is renewable in theory, at least
9 that's how we kind of define renewable natural gas,
10 that would make sense.

11 What I was referring to is more the
12 traditional idea of steam reformation of gas taken
13 off a wellhead.

14 But I really want to reiterate a
15 point that I think got lost earlier, which is the
16 definition section of the statute does this weird
17 thing where it defines renewable natural gas to
18 mean, A, biogas; B, hydrogen written large; and
19 then C, methane derived from biogas and hydrogen
20 produced from renewable energy sources. That's in
21 the actual statutory definition.

22 So the question becomes, are you
23 saying that only hydrogen like on its own can be --
24 come from anywhere but the second you start mixing
25 it with methane it has to come from renewable

1 energy sources? That's kind of how I would read
2 the statute in its weird definitional section.

3 And I don't think that anybody here
4 has proposed like a pure play hydrogen LPC system.
5 So the second you start injecting hydrogen into
6 methane, it would appear you're falling under
7 subsection C of subsection 6, the definition, which
8 case it has to come from renewable energy sources.

9 I'm not trying to make an argument
10 for why it should be that way. I'm just saying
11 that appears to be how it's written and it is
12 slightly confusing, but it's something the
13 Commission has to grapple with because you have
14 these two different definitions in the same area
15 that creates confusion.

16 JUDGE DIPPELL: Did you have anything
17 else, Commissioner?

18 CHAIR HAHN: No further questions.
19 Thank you.

20 JUDGE DIPPELL: Any other comments on
21 that point? All right. Mr. Stacey, go ahead.

22 MR. STACEY: Thank you.

23 Under 20 CSR 4240-40.100(1)(D), that
24 was also in GX-2024-0326, paragraph 2 submitted by
25 Summit, the current text is: Renewable natural gas

1 adjustment mechanism (RNGRAM) means a mechanism
2 that allows periodic adjustments to recover
3 prudently incurred costs and pass-through of
4 benefits.

5 Request to add language: No
6 frequency clarified for the periodic adjustments.
7 They recommend that RNGRAM be filed annually. This
8 annual filing will include a review of the proposed
9 rate adjustments to recover these costs from
10 customers.

11 Staff prefers either the existing
12 proposed language or OPC's recommendation. Being
13 allowed to determine on a case-by-case basis the
14 timelines for prudence reviews gives Staff the
15 flexibility to stagger gas corporation prudence
16 reviews.

17 JUDGE DIPPELL: Are there any
18 additional comments based on that? Not seeing any.
19 Go ahead, Mr. Stacey.

20 MR. CLIZER: 20 CSR
21 4240-40.100(2)(D). Current text is: An
22 explanation of how the utility will match
23 generation with customer usage, be it on a
24 retrospective or percentage basis.

25 Summit indicated in paragraph 3 in

1 GX-2024-0326 comments: It is not clear what
2 information natural gas utilities are required to
3 provide to the PSC. It would be valuable to
4 receive further clarification on that required
5 information.

6 Staff indicates: Proposed language
7 is intended to seek information about the
8 seasonality/timing of production of renewable
9 natural gas versus its usage by customers.

10 JUDGE DIPPELL: Are there any
11 additional comments? All right. Go ahead,
12 Mr. Stacey.

13 MR. STACEY: Under 20 CSR
14 4240-40.100(2)(K)(11), current text: A
15 cost-benefit analysis, including but not limited
16 to: Estimated cost of procuring the same volume of
17 natural gas from a pipeline, including estimates of
18 the price per million British Thermal Units by
19 month for the life of the proposed RNG project and.

20 Summit in paragraph 4 indicates: An
21 estimated cost may not be available for all years,
22 depending on the estimated project life. A
23 five-to-ten-year projection is recommended to
24 balance short-term and long-term financial
25 planning, initial program phases, and assess the

1 long-term sustainability and cost effectiveness of
2 proposed projects.

3 Staff's position is: Any reasonable
4 cost-benefit analysis will consider costs and
5 benefits over the same time period. A cost-benefit
6 analysis over the life of the facility needs to
7 incorporate operations, maintenance, replacements
8 of parts as facilities age, et cetera. Recovery of
9 the investment will occur over the life of the
10 facilities, thus the cost-benefit analysis should
11 cover the same time period.

12 JUDGE DIPPELL: Any comments? Go
13 ahead, Mr. Stacey.

14 MR. STACEY: 20 CSR
15 4240-40.100(3)(B). Summit submitted a comment on
16 GX-2024-0326, paragraph 5. Their request for
17 clarification: Provide clarity on essential
18 components and considerations to be included in the
19 feasibility analysis.

20 Staff's position is: A feasibility
21 analysis should cover market demand, technical
22 feasibility, financial viability, and operational
23 capabilities.

24 JUDGE DIPPELL: Any comments,
25 questions?

1 CHAIR HAHN: Is there anyone here
2 from Summit? No. Okay. Since Summit can't
3 respond because they're not present, unless any
4 other party has comments on the changes that Summit
5 proposed, maybe we just skip through Summit's since
6 we are just clarifying information that they
7 requested be clarified.

8 JUDGE DIPPELL: All right. Do you
9 want to just skip all of --

10 MR. STACEY: I'll skip Summit's
11 questions. I'll move to page 9, comments by Spire.

12 JUDGE DIPPELL: Sounds good.

13 MR. STACEY: 20 CSR 4240-40.100(2),
14 Spire submitted comments on GX-2024-0326,
15 paragraph 2. Requested addition: Applications
16 under this rule do not supersede a gas utility's
17 obligation to apply for the certificate of
18 convenience and necessity under Section 393.170,
19 RSMo unless the proposed RNG infrastructure is in a
20 location that's already certificated.

21 Staff's position is: The proposed
22 rule requires a utility to apply for a CCN for each
23 RNG infrastructure.

24 JUDGE DIPPELL: And are there
25 comments by Spire?

1 MR. BOUSELLI: This is Eric Bouselli
2 with Spire again. I just reiterate our comment
3 from earlier that if a CCN is required, it should
4 be recognized that RNG infrastructure encompasses a
5 broad variety of types of investments, including
6 interconnects, pipeline and then production assets.
7 Those -- I guess we would recommend that it would
8 be -- the CCN would be limited to those production
9 assets if one is to be required because those are
10 typically the ones of larger scope and kind of
11 outside the norm of our business. I believe
12 interconnects, we have those on our books already
13 and can make those investments, and I don't believe
14 a CCN might be required for those currently. I'd
15 look into that.

16 But that would be our comment, just
17 if one's going to be required, limit it to those
18 production-type investments.

19 JUDGE DIPPELL: Any other comment?

20 MR. CLIZER: I want to make a play
21 here. Apologies if it doesn't work. I just note
22 that Mr. Stacey appears to be just reading off kind
23 of the two columns of this. I respect that. I
24 think Staff did a really good job putting this
25 together.

1 Given the current state of affairs,
2 would it be possible for us to just take a very
3 short break and let other parties read through this
4 and see if they have any comments to what's
5 written, just because I feel like otherwise we're
6 just going to be reading through this entire thing.
7 Is that completely unreasonable? It seems like it
8 might expedite the thing. Again, I'll just stop
9 talking if you think it's better we just plow
10 ahead.

11 JUDGE DIPPELL: I think we'll just go
12 ahead and go through the rest of Spire's comments
13 and then -- and Mr. Stacey, if you want to just
14 address the section that the comments are and
15 Staff's response. I think -- I think maybe
16 everybody has already read Spire's written
17 comments. Will that mess you up?

18 MR. STACEY: No. That's fine. I
19 just want to make it easier for everybody to
20 understand where we're coming from and what the
21 comment was specifically on.

22 JUDGE DIPPELL: We appreciate the
23 work that Staff has done.

24 MR. STACEY: All right. The comment
25 by Spire in GX-2024-0326, paragraph 2, Staff's

1 position is: The proposed language is intended to
2 seek information about the seasonality/timing of
3 production of renewable natural gas versus its
4 usage by customers.

5 JUDGE DIPPELL: And did Spire have
6 any response? Anyone else have any comment or
7 response? Go ahead, Mr. Stacey.

8 MR. STACEY: Comment of Spire
9 GX-2024-0326, paragraph 3, Staff believes change is
10 unnecessary. The existing language is broad enough
11 to consider during an application for approval of a
12 program.

13 There is alternative language.
14 Again, all prospective sales of RNG attributes.

15 JUDGE DIPPELL: And did Spire have a
16 comment to that?

17 MR. BOUSELLI: This is similar to
18 what is brought up for the Roeslein comment for the
19 alternative language. It is sufficient.

20 MR. CLIZER: We support the
21 alternative language.

22 JUDGE DIPPELL: All right. Go ahead,
23 Mr. Stacey.

24 MR. STACEY: Comment by Spire,
25 paragraph 4A in GX-2024-0326: The proposed rule

1 language does not prevent gas corporations from
2 providing support for the inclusion of reasonably
3 estimated benefits in a cost-benefit analysis.

4 JUDGE DIPPELL: Are there comments?
5 All right. Go ahead.

6 MR. STACEY: Spire comment
7 GX-2024-0326, paragraph 4B, Staff's position is:
8 Any reasonable cost-benefit analysis will consider
9 costs and benefits over the same time period. A
10 cost-benefit analysis over the life of a facility
11 needs to incorporate operations, maintenance,
12 replacements of parts as facilities age. Recovery
13 of the investment will occur over the life of the
14 facilities, thus the cost-benefit analysis should
15 cover the same time period.

16 JUDGE DIPPELL: And are there any
17 comments? Seeing none. Go ahead, Mr. Stacey.

18 MR. STACEY: Paragraph 5 of Spire's
19 comments in GX-204-0326: Staff recommends the most
20 current cost of capital established in the most
21 recent rate case. This is how other single-issue
22 ratemaking mechanisms work, such as ISRS,
23 et cetera.

24 JUDGE DIPPELL: Any comments? Seeing
25 none. Go ahead, Mr. Stacey.

1 MR. STACEY: Spire comment,
2 paragraph 6 in GX-2024-0326, Staff's position:
3 Applicants should identify if a methodology other
4 than that used in the gas utility's last rate case
5 was utilized.

6 JUDGE DIPPELL: Any response? Go
7 ahead.

8 MR. STACEY: Spire comment,
9 paragraph 7A and B in GX-2024-0326: Staff supports
10 language modification to (4)(C): The gas utility
11 shall offset its RNGRAM in the future as necessary
12 to recognize and account for any such disallowed
13 costs.

14 JUDGE DIPPELL: Any response?

15 MR. BOUSELLI: This is Eric Bouselli
16 with Spire again. I guess part of our comment kind
17 of went further to highlight the two sections in
18 there of the ISRS-like language of adjusting a
19 RNGRAM in the future for the recovery of costs, but
20 we also commented on that six-month window. So I'm
21 not sure if Staff was trying to address that
22 comment as well or if that warrants like a further
23 discussion.

24 JUDGE DIPPELL: Any further response
25 from Staff?

1 MR. CLIZER: For what it's worth, the
2 OPC also actually does think that there appears to
3 be a contradiction, that Spire might be correct
4 here. It requires the disallowance to be flown
5 back over the next RINGRAM but then also turns
6 around and says over the next six months. So the
7 question is, okay, do they have to have an RINGRAM
8 in that six months? Does it have to go back --
9 does the RINGRAM have to only last six months?
10 I think that's what Spire's point is. There is a
11 bit of confusion with that.

12 JUDGE DIPPELL: Okay. Well, the
13 comments are noted and the Commission can take that
14 into consideration.

15 MR. STACEY: I'll address that with
16 Staff as well.

17 JUDGE DIPPELL: Go ahead, Mr. Stacey.

18 MR. STACEY: Spire comment
19 GX-2024-0326, paragraph 7C, Staff does not oppose
20 that position.

21 JUDGE DIPPELL: Are there any other
22 comments?

23 MR. CLIZER: Very briefly. The OPC
24 suggests that if you use a generic short-term debt
25 rate, you use S&P's A2 or Moody's P2 30-day

1 commercial paper rate instead of prime minus two.
2 This will more accurately reflect the actual
3 short-term debt rate of utilities in our opinion.
4 Thank you.

5 JUDGE DIPPELL: Any other comments?
6 Okay. Go ahead, Mr. Stacey.

7 MR. STACEY: Spire's comment in
8 GX-2024-0326, paragraph 8. Staff's position is
9 that only the cost of molecules should be recovered
10 in the PGA. Any premium for renewable natural gas
11 attributes should be considered in the RNGRAM.

12 JUDGE DIPPELL: And are there
13 responsive comments to that?

14 MR. BOUSELLI: This is Eric Bouselli
15 with Spire. I think I might have brought this up
16 in the initial comments, but we do see an avenue
17 for not only the molecule but potentially the
18 attributes to flow through the PGA, and the
19 situation where that might make sense would be like
20 in an off-take agreement type situation where the
21 utility is procuring both the gas and the
22 attribute. We'll let the cost of the molecule flow
23 through as well as any benefits that might come
24 through the sale of the related attributes to also
25 flow through the PGA, and then the RNGRAM could be,

1 I think based on some of the language in the
2 legislation is kind of specified for those capital
3 investments and related operating costs to recover
4 those.

5 So there's two avenues to get -- to
6 procure RNG. One would be the straight
7 procurement, and the other would be an investment
8 for production type situation. So there's two
9 avenues where they could be bifurcated, and I have
10 seen evidence. I think a utility that we observed
11 in Virginia allowed the attribute revenues to flow
12 through to the PGA for those types of off-take
13 agreements. So there's some nuance that could be
14 at play there.

15 JUDGE DIPPELL: Any other response or
16 comment?

17 MR. CLIZER: We agree with Staff's
18 position. The PGA should be just molecules only.
19 They are more than okay to recover the costs -- I'm
20 sorry -- flow those benefits back through the
21 RNGRAM, the RNGRAM. We are fine with that. But
22 you want to keep the PGA clean because that's how
23 you measure how much gas a company is using.

24 JUDGE DIPPELL: Any other response?
25 All right. Mr. Stacey, go ahead.

1 MR. STACEY: Spire's comment in
2 GX-2024-0326, paragraph 9: Staff is opposed to RNG
3 transactions flowing through the PGA. Only costs
4 associated with molecules should be recovered
5 through the PGA. Rather than the company's
6 proposed language of net revenues, Staff recommends
7 the following alternative language:

8 (B) All costs and all revenues are
9 passed through to customers as provided for in
10 section (4) of this rule or through a general rate
11 proceeding.

12 JUDGE DIPPELL: And are there
13 responses to that additional language?

14 MR. BOUSELLI: Spire's okay with the
15 additional language for subsection B.

16 JUDGE DIPPELL: All right. Go ahead,
17 Mr. Stacey.

18 MR. STACEY: Spire comment,
19 paragraph 10 in GX-2024-0326. Staff's response is
20 there's no statutory time frame. At this time the
21 type of RNG programs and projects being discussed
22 vary greatly in complexity. This makes it
23 difficult to propose a timeline for Staff to
24 complete its due diligence and provide
25 recommendations to the Commission. Considering the

1 proposed language is broad and allows the gas
2 corporations to propose a variety of programs,
3 using a variety of possible attributes, flexibility
4 on the timeline for Commission decision is
5 reasonable.

6 JUDGE DIPPELL: And are there any
7 other responses? Okay. Go ahead, Mr. Stacey.

8 MR. STACEY: Spire comment,
9 paragraph 1 in GX-2024-0337. Staff acknowledges
10 that not all constitutes -- or constituents that
11 may conceivably be found in RNG are specifically
12 required to be monitored under the proposed rule
13 amendments. The constituents for which Staff
14 includes limits in the proposed rule amendment are
15 based on staff's review of the current natural gas
16 quality standards in the FERC tariffs for the
17 interstate natural gas pipeline operators
18 delivering gas to Missouri natural gas distribution
19 systems.

20 Staff's intention is that the RNG
21 that is substituted for or blended with the natural
22 gas delivered to a system must be of equal quality
23 as the natural gas that is currently delivered to
24 Missouri and utilized by Missouri customers.

25 To the extent that there may be other

1 less commonly occurring constituents of concern,
2 for example halogens and vinyl chloride as
3 indicated by Spire, Staff's proposed amendments do
4 not provide specific limits but instead include the
5 following general provisions.

6 Do you want me to read those
7 provisions?

8 JUDGE DIPPELL: No. That's fine.
9 Does anyone have any other comments or response to
10 those comments?

11 MR. BOUSELLI: This is Eric Bouselli
12 with Spire. I think part of our comment was just
13 to highlight that some constituents are
14 continuously monitored. Others are periodically
15 sampled for testing. But yes, we agree that
16 monitoring will be in place. We just wanted to
17 highlight that some things aren't always
18 continuous. Again, it's kind of dependent on my
19 understanding what the feed stock might be that
20 might warrant different types of sampling for
21 testing.

22 JUDGE DIPPELL: Thank you. Go ahead,
23 Mr. Stacey.

24 MR. STACEY: Spire comment on
25 GX-2024-0337, paragraph 2. The basis of Staff's

1 proposal was a review of the FERC tariffs for the
2 ten interstate natural gas pipeline operators
3 delivering natural gas to Missouri. Four out of
4 the ten limit hydrogen to -- I believe we talked
5 about this before -- to 400 parts per million as
6 proposed by Staff, and another specifies trace
7 amounts.

8 Staff believes that the limit of 400
9 parts per million maximum hydrogen is appropriate
10 for renewable natural gas products that are
11 intended to be a direct substitute for natural gas.

12 JUDGE DIPPELL: Are there any other
13 comments?

14 CHAIR HAHN: There is a Staff -- it
15 looks like on the next page, a Staff recommended
16 change of language. Are there any comments or
17 feedback on that?

18 JUDGE DIPPELL: Yeah. Thank you,
19 Chair. I kind of cut you off there, Mr. Stacey,
20 before you got to that part. Are there any
21 comments or does anyone need to review that
22 proposed language?

23 MR. STACEY: This is the existing
24 proposal language. It's not for us to change.

25 JUDGE DIPPELL: Okay. Thank you.

1 Thank you for that clarification.

2 All right. There were comments,
3 written comments, and Staff summarized those and
4 responded to them, from Ted Christensen.

5 Mr. Christensen isn't in the room, is he?

6 MR. STACEY: I do not believe so.

7 JUDGE DIPPELL: I don't believe it's
8 necessary for Staff to go through those
9 individually as the written comments will be in the
10 record and we can review those.

11 Did Staff have other comments that
12 they wished to highlight or respond to?

13 MR. STACEY: I do not believe so at
14 this time, Judge.

15 JUDGE DIPPELL: Thank you. Are there
16 any other responses to any of Staff's comments or
17 the other comments that were made today? Go ahead.

18 MR. BOUSELLI: This is Eric Bouselli
19 with Spire. I just want to note that, due to some
20 of these comments, we might need some time to
21 digest them and just kind of reserve the right to
22 file any additional comments.

23 JUDGE DIPPELL: Because of the way
24 the rulemaking process works, we can't really
25 accept further comments after the hearing.

1 However, you can certainly present those comments
2 to Staff, and as we're reviewing things, the
3 Commission will be able to have discussions in
4 deciding what to put in the final order of
5 rulemaking. But officially the comment period ends
6 with the hearing today. Did I muddy the waters
7 there? Are there any other comments? Chair Hahn?

8 CHAIR HAHN: Just to close out, this
9 rulemaking has been three years in the making, so I
10 really appreciate the parties bringing substantive
11 comments to the hearing today. And I really
12 appreciate Staff for spending a significant amount
13 of time developing these very complex technical
14 rules. They certainly did all their homework, and
15 I think the comments today reflect how well the
16 first draft was put together.

17 So I just appreciate the parties and
18 Staff for getting us to this point. Thank you.

19 JUDGE DIPPELL: Are there any other
20 comments?

21 COMMISSIONER KOLKMEYER: This is
22 Commissioner Kolkmeier. Just want to thank
23 everybody for their work on this and to thank Chair
24 Hahn and thank you, Judge, for this. It's been
25 very informative.

1 JUDGE DIPPELL: Appreciate it. All
2 right. I think, then, that that will conclude
3 these rulemaking hearings for both cases, and we
4 can adjourn. Go off the record.

5 (WHEREUPON, the hearing concluded at
6 11:19 a.m.)

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C E R T I F I C A T E

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, Kellene K. Feddersen, Certified Shorthand Reporter with the firm of Alaris Litigation Services, do hereby certify that I was personally present at the proceedings had in the above-entitled cause at the time and place set forth in the caption sheet thereof; that I then and there took down in Stenotype the proceedings had; and that the foregoing is a full, true and correct transcript of such Stenotype notes so made at such time and place.

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Kellene K. Feddersen, RPR, CSR, CCR

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