



JOINT UTILITIES RENEWABLE GAS INTERCONNECTION AGREEMENTS

Maas Energy Works' Comments

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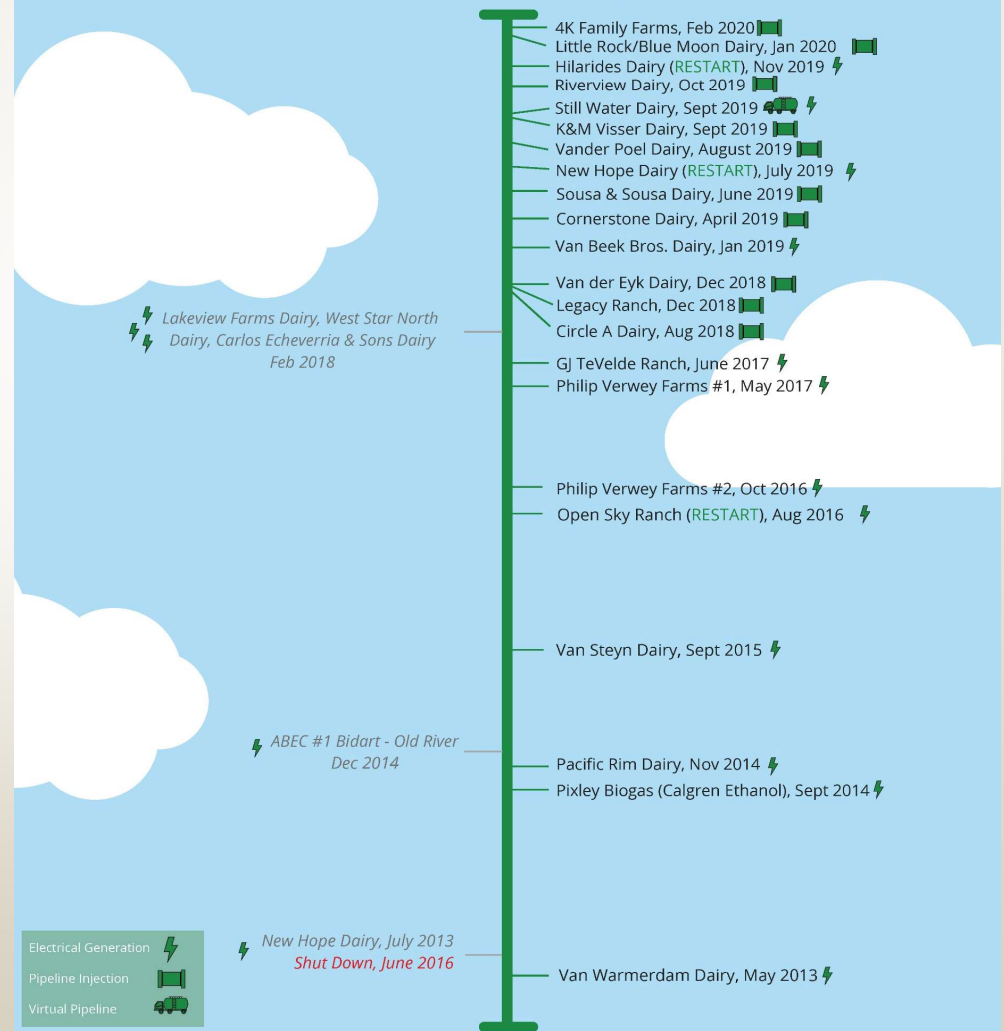


The California dairy biogas industry is growing, while at the same time shifting to biomethane vs electric.

Dairy Digesters Built in California

By All Others

By Maas Energy Works



Value of Joint Agreements

- Reduced number of agreements
 - Rule 21 / Rule 39
 - IA / CPIA
 - SB-1383 Interconnection Agreements
- Focused interpretations
 - Should minimize advice letters
 - Speed?



A photograph of a construction site showing a deep trench being dug. A worker in an orange safety vest and white hard hat is standing in the trench, working on a large pipe. In the background, there are yellow excavators and a cornfield under a blue sky. The image is partially obscured by a green and grey diagonal graphic element.


Warranty Provisions

- WAS: adjusted from a required three years of warranty
 - In some cases, no such warranties were available.
- IS NOW: “equivalent to the warranty Utility would receive on such installation and parts”
 - This adjustment is beneficial and appears fair.

Self Build Option 4(c)(iii) and Exhibit F

- WAS: Sometimes unclear as to interconnector's right to self build
- IS NOW: Clearly defines interconnector's option to design and/or procure and install.
 - This adjustment is beneficial and clear





Section 16(a) Performance Assurance

WAS:

\$1,000,000 for PG&E

\$0 for SoCalGas

NOW:

\$1,000,000 for both

COMMENT:

- Excessive new market barrier
- The utilities are not exposed to any significant risk since all design and construction costs are paid up front, and refunds of excess funds take 1-2 years.
- What value is this \$1M providing? In case of a SoCal project, the old contract might be better, just to save this \$1M

Section 5(i)

- Section 5(i) should be clarified that an injection facility is a single injection source.
- “Renewable Gas Sampling. Interconnector acknowledges that injection of the Renewable Gas into the Utility System requires a quality assessment of a sample of the Renewable Gas from the ~~Renewable Gas source~~ **Interconnector's Facilities**, and such assessment shall be performed in accordance with Utility's Gas Rule No. [__].”
 - Without this change, clusters of biogas sources could trigger re-assessment and resampling due to growth, seasonal changes, and transport changes