

Energy - Docket Optical System

From: Rus Miller [JRusMiller@carollo.com]
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To: Energy - Docket Optical System; O'Neill, Garry@Energy
Subject: 13-IEP-1M Comments



Please consider the following comments.

SoCalGas presentation:

- Why must gas be consumed locally? This is an unnecessary restriction that raises costs. Methan is fungible and can be handled in a pipeline as electricity is handled in wires.
- Point of Receipt monitoring threatens to be excessive. The monitoring should be no more elaborate nor burdensome than natural gas receipts from other sources.
- Will the utility pay for ancillary services such as distributed gas storage for delivery on demand or for pressure support at the end of pipelines? The electrical utilities have payment structures for providing such services and the issues are parallel.
- As the utility has standard designs for interconnection, the cost of providing that design should not be charged repeatedly to customers of the monopoly utility.
- The CIAC tax on interconnection facility occurs only if the utility owns the equipment in a forced contribution by the customer. Let the customer own the equipment.

Biomethane lacks condensable components so improves pipeline operation by removing some of the need to handle those liquids, though they have value.

Regards,

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