

Attachment A-2
Verification of Biomethane Related Claims for 2008-2010

The *RPS Eligibility Guidebook, Third Edition*, establishes the following requirements for the use of biomethane obtained through a natural gas pipeline system (these requirements are generally the same in the Fourth, Fifth, and Sixth editions of the *RPS Eligibility Guidebook* as well):

1. The gas must be produced from an RPS-eligible resource, such as biomass or digester gas.
2. The gas must be injected into a natural gas pipeline system that is either within the WECC region or interconnected to a natural gas pipeline system in the WECC region that delivers gas into California.
3. The energy content produced and supplied to the transportation pipeline system must be measured on a monthly basis and reported annually, illustrated by month. Reporting shall be in units of energy (for example, MMBtu) based on metering of gas volume and adjusted for measured heat content per volume of each gas. In addition, the total amount of gas used at the RPS-eligible facility must be reported in the same units measured over the same period, and the electricity production must be reported in MWh.
4. The gas must be used at a facility that has been certified as RPS-eligible. As part of the application for certification, the applicant must attest that the RPS-eligible gas will be nominated to that facility or nominated to the LSE-owned pipeline serving the designated facility.
5. In its annual RPS Procurement Verification report, the Energy Commission will calculate the RPS-eligible energy produced using the same methodology discussed above.

In addition to these requirements, the Fourth, Fifth, and Sixth editions of the *RPS Eligibility Guidebook* clarify that the applicant must enter into contracts for the delivery or storage of the gas with every pipeline or storage facility operator transporting or storing the gas from the injection point to California (or to the electric generating facility if the electric generating facility is located outside California).

For verification, it must be confirmed that the biomethane used at a facility met the above requirements. Staff confirms satisfaction of these requirements by requesting, at a minimum, the following information from the generating facilities or load serving entities:

1. The pipeline delivery path of the biomethane from the gas source to the generating facility.

2. Copies of contracts for each pipeline section of the delivery path, as well as the contract for the purchase of the biomethane.
3. Monthly energy content and volume meter data for the gas injected in the pipeline at the source as well as for the gas taken from the pipeline at the generating facility.
4. Invoices for the purchases of biomethane
5. In the event that biomethane was stored for later use at the facility, contracts for storage with the pipeline operators and monthly storage statements for this gas are also required.

Staff is currently analyzing biomethane data submitted to date and will present available findings at the workshop.