



**TRUNKLINE GAS COMPANY**

An ENERGY TRANSFER Company

November 18, 2020

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, D.C. 20426

Re: Trunkline Gas Company, LLC  
Docket No. RP21-\_\_\_\_\_  
New Quality Provision for Renewable Gas

Dear Ms. Bose:

Pursuant to Section 4 of the Natural Gas Act and the provisions of Section 154.204 of the Regulations of the Federal Energy Regulatory Commission (Commission), Trunkline Gas Company, LLC (Trunkline) hereby electronically submits for filing with the Commission the revised tariff record listed below to its FERC NGA Gas Tariff, Fourth Revised Volume No. 1 (Tariff), proposed to become effective December 19, 2020.

<u>Version</u>	<u>Description</u>	<u>Title</u>
3.0.0	GT&C Section 13.	Quality

**STATEMENT OF NATURE, REASONS AND BASIS**

The purpose of this filing is to add a new tariff provision in Section 13 of the General Terms and Conditions (GT&C) of Trunkline's Tariff specifying the quality standards for the receipt of renewable natural gas (RNG) into Trunkline's pipeline system. As RNG may come from a variety of sources and subsequently have varying gas quality, it is important to develop standards within Trunkline's tariff that provide business opportunity for prospective supply as well as provide assurance of consistent and compliant gas quality to Trunkline's existing shippers.

Trunkline describes the variety of sources of RNG that could be delivered into Trunkline's pipeline system in new GT&C Section 13.6 and proposes quality standards for RNG in GT&C Sections 13.6(A), (B), (C) and (D). These standards are in addition to the existing quality provisions contained in GT&C Sections 13.1 through 13.5.

Trunkline's existing provision in GT&C Section 13.1 requires that gas received for transportation be free of any hazardous or toxic substances. Trunkline expands on this provision in proposed GT&C Section 13.6(A) specifically addressing RNG. RNG received for transportation on Trunkline's pipeline shall be free of any toxic or hazardous substance that may be hazardous to health, injurious to pipeline facilities or be a limit to merchantability or be contrary to government standards.

GT&C Section 13.6(B) provides that Trunkline's acceptance of RNG will be evaluated on a case by case basis, considering the pipeline operating conditions at and downstream of the receipt location. These evaluations are to prevent any potentially adverse or unsafe operating condition on Trunkline or any existing shipper's facilities downstream of the point of interconnection and to avoid any requirement to modify existing environmental or other permits required to operate Trunkline's compression facilities.

In order to monitor substances that could be received in RNG, Trunkline provides in GT&C Section 13.6(C) for periodic testing of RNG. The testing shall not be less than a quarterly basis.

Trunkline further clarifies in proposed GT&C Section 13.6(D) that it will prohibit RNG from a landfill containing hazardous waste from being injected into its pipeline system.

These proposed RNG standards are consistent with Commission precedent and are similar to provisions approved for Northwest Pipeline LLC in Docket Nos. RP08-411-000 and RP20-531-000.<sup>1</sup>

## **IMPLEMENTATION AND WAIVER REQUEST**

Pursuant to Section 154.7(a)(9) of the Commission's regulations, Trunkline requests that the proposed tariff record submitted herewith be accepted effective December 19, 2020. Trunkline respectfully requests that the Commission grant any and all waivers of its regulations it deems necessary in order to accept the tariff record effective December 19, 2020, as proposed.

## **CONTENTS OF THE FILING**

This filing is made in electronic format in compliance with Section 154.4 of the Commission's Regulations. The proposed tariff record in RTF format with metadata attached is being submitted as part of an XML filing package containing the following:

- . A transmittal letter in PDF format
- . A clean copy of the proposed tariff record in PDF format
- . A marked version of the proposed tariff changes in PDF format
- . A copy of the complete filing in PDF format for publishing in eLibrary

## **COMMUNICATIONS, PLEADINGS AND ORDERS**

Trunkline requests that all Commission orders and correspondence as well as pleadings and correspondence from other parties concerning this filing be served on each of the following:

***Michael T. Langston***<sup>2</sup>

Vice President  
Chief Regulatory Officer  
Trunkline Gas Company, LLC  
1300 Main Street  
Houston, TX 77002  
(713) 989-7610  
(713) 989-1205 (Fax)  
[michael.langston@energytransfer.com](mailto:michael.langston@energytransfer.com)

***Kevin Erwin***<sup>2</sup>

Associate General Counsel  
Trunkline Gas Company, LLC  
1300 Main Street  
Houston, TX 77002  
(713) 989-2745  
(713) 989-1212 (Fax)  
[kevin.erwin@energytransfer.com](mailto:kevin.erwin@energytransfer.com)

---

<sup>1</sup> *Northwest Pipeline GP*, Letter Order dated July 8, 2008 in Docket No. RP08-411-000 and *Northwest Pipeline LLC*, Letter Order dated March 17, 2020 in Docket Nos. RP20-531-000 and RP20-531-001.

<sup>2</sup> Designated to receive service pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure. Trunkline respectfully requests that the Commission waive Rule 203(b)(3), 18 C.F.R. § 385.203(b)(3), in order to allow Trunkline to include additional representatives on the official service list.

Ms. Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
December 19, 2020  
Page 3

**Deborah A. Bradbury**<sup>2 3</sup>

Sr. Director, Regulatory Tariffs & Reporting  
Trunkline Gas Company, LLC  
1300 Main Street  
Houston, TX 77002  
(713) 989-7571  
(713) 989-1205 (Fax)  
[debbie.bradbury@energytransfer.com](mailto:debbie.bradbury@energytransfer.com)

In accordance with Section 154.2(d) of the Commission's Regulations, a copy of this filing is available for public inspection during regular business hours at Trunkline's office at 1300 Main Street, Houston, Texas 77002. In addition, copies of this filing are being served electronically on jurisdictional customers and interested state regulatory agencies. Trunkline has posted a copy of this filing on its Internet web site accessible via <http://tgcmessage.energytransfer.com> under Informational Postings, Regulatory.

Pursuant to Section 385.2005(a) of the Commission's Regulations, the undersigned has read this filing and knows its contents, the contents are true as stated, to the best of her knowledge, and belief, and possesses full power and authority to sign such filing.

Respectfully submitted,

TRUNKLINE GAS COMPANY, LLC

*/s/ Deborah A. Bradbury*

Deborah A. Bradbury  
Sr. Director, Regulatory Tariffs & Reporting

---

<sup>3</sup> Designated as responsible Company official under Section 154.7(a)(2) of the Commission's Regulations.

## GENERAL TERMS AND CONDITIONS

### 13. QUALITY

Trunkline shall not be obligated to accept Gas for Transportation which does not meet these quality provisions; provided, however, Gas quality provisions for transactions in the South Texas Modified Transmission System shall be stated in Section 13.5 below:

- 13.1 Gas received shall be merchantable Natural Gas; shall be free of water and hydrocarbons in liquid form; shall contain not more than 7 pounds of water vapor per MMcf unless otherwise agreed to in advance by Trunkline, 1.0 grain of hydrogen sulphide and twenty (20) grains of total sulphur per one hundred (100) cubic feet, 2% of carbon dioxide and 3% of nitrogen (by volume), and fifty (50) parts per million of oxygen; shall not contain any active bacteria or bacterial agent, including but not limited to sulphate reducing bacteria and acid producing bacteria; shall not contain any hazardous or toxic substances; and shall not exceed one hundred twenty degrees (120°) Fahrenheit in temperature.
- 13.2 The Gas shall have a total or gross heating value of not less than nine hundred fifty (950) Btu and not more than one thousand two hundred (1,200) Btu per cubic foot at the Points of Receipt. Trunkline may increase or decrease the heat content of said Gas before delivery thereof to Shipper provided that such increase or decrease will not result in a total heating value above one thousand two hundred (1,200) or below nine hundred fifty (950) Btu per cubic foot.
- 13.3 Deliveries of Gas at the Points of Receipt shall be at a pressure sufficient to enter Trunkline's pipeline system at such point. Deliveries of Gas at the Points of Delivery shall be at such pressure as may exist in Trunkline's pipeline at such point from time to time.
- 13.4 Shipper shall indemnify Trunkline from any loss, cost, damage or expense incurred by Trunkline as a direct or indirect result of Shipper's failure to comply with the provisions of this Section 13, except to the extent such loss, damage, expense, claim, suit, action or proceeding is the result of Trunkline's negligence, bad faith or willful misconduct or is the direct result of Trunkline's deliberate decision to take Shipper's nonconforming Gas.
- 13.5 Gas transported on the South Texas Modified Transmission System shall conform to the provisions of Sections 13.1, 13.3 and 13.4 above; provided, however, the Gas shall contain not more than 3% of carbon dioxide (by volume). In addition, the Gas shall have a total or gross heating value of not less than eleven hundred (1100) Btu per cubic foot and not more than thirteen hundred (1300) Btu per cubic foot.
- 13.6 Renewable Natural Gas ("RNG"), which may come from a variety of sources, including municipal solid waste landfills, digesters at water resource recovery facilities (wastewater treatment plants), livestock farms, food production facilities and organic waste management operations, delivered into Trunkline's pipeline system at Point(s) of Receipt in

Trunkline's pipeline system shall, in addition to the provisions contained in Section 13.1 through 13.5, conform to the following quality standards:

- (A) shall be free of any toxic or hazardous substance including, without limitation, ammonia, sulfides, hydrogen, carbon monoxide, and nonmethane organic compounds that may be hazardous to health, injurious to pipeline facilities, or be a limit to merchantability or be contrary to applicable government standards;
- (B) shall be evaluated on a case by case basis, considering the pipeline operating conditions at and downstream of the receipt location, such as (i) the prevention of any potentially adverse impact to, or unsafe operating condition on Trunkline or any of its existing Shipper's facilities downstream of the point of interconnection, and (ii) the avoidance of any requirement to modify any existing environmental or other permits such as, without limitation, those required to operate Trunkline's compression facilities; and
- (C) RNG to be delivered to and transported on Trunkline's pipeline system shall be subject to periodic testing and monitoring which shall not be less than a quarterly basis.
- (D) Trunkline prohibits RNG from a landfill containing hazardous waste, as defined in Title 40 of the Code of Federal Regulation (CFR) Section 261.3, from being injected into its pipeline system. The operator of a receipt point shall not knowingly supply or cause to supply RNG from a landfill containing hazardous waste. It is the responsibility of the operator of a landfill receipt point to disclose whether the landfill is a site of hazardous waste, has ever been a site of hazardous waste, contains hazardous waste, or ever accepted hazardous waste. Hazardous waste landfills include all and continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, and disposal or recycling of hazardous waste. The operator of the landfill receipt point shall demonstrate verification from an approved laboratory that the RNG does not originate from hazardous waste before gas flows into Trunkline's pipeline system.

MARKED VERSION

## GENERAL TERMS AND CONDITIONS

### 13. QUALITY

Trunkline shall not be obligated to accept Gas for Transportation which does not meet these quality provisions; provided, however, Gas quality provisions for transactions in the South Texas Modified Transmission System shall be stated in Section 13.5 below:

- 13.1 Gas received shall be merchantable Natural Gas; shall be free of water and hydrocarbons in liquid form; shall contain not more than 7 pounds of water vapor per MMcf unless otherwise agreed to in advance by Trunkline, 1.0 grain of hydrogen sulphide and twenty (20) grains of total sulphur per one hundred (100) cubic feet, 2% of carbon dioxide and 3% of nitrogen (by volume), and fifty (50) parts per million of oxygen; shall not contain any active bacteria or bacterial agent, including but not limited to sulphate reducing bacteria and acid producing bacteria; shall not contain any hazardous or toxic substances; and shall not exceed one hundred twenty degrees (120°) Fahrenheit in temperature.
- 13.2 The Gas shall have a total or gross heating value of not less than nine hundred fifty (950) Btu and not more than one thousand two hundred (1,200) Btu per cubic foot at the Points of Receipt. Trunkline may increase or decrease the heat content of said Gas before delivery thereof to Shipper provided that such increase or decrease will not result in a total heating value above one thousand two hundred (1,200) or below nine hundred fifty (950) Btu per cubic foot.
- 13.3 Deliveries of Gas at the Points of Receipt shall be at a pressure sufficient to enter Trunkline's pipeline system at such point. Deliveries of Gas at the Points of Delivery shall be at such pressure as may exist in Trunkline's pipeline at such point from time to time.
- 13.4 Shipper shall indemnify Trunkline from any loss, cost, damage or expense incurred by Trunkline as a direct or indirect result of Shipper's failure to comply with the provisions of this Section 13, except to the extent such loss, damage, expense, claim, suit, action or proceeding is the result of Trunkline's negligence, bad faith or willful misconduct or is the direct result of Trunkline's deliberate decision to take Shipper's nonconforming Gas.
- 13.5 Gas transported on the South Texas Modified Transmission System shall conform to the provisions of Sections 13.1, 13.3 and 13.4 above; provided, however, the Gas shall contain not more than 3% of carbon dioxide (by volume). In addition, the Gas shall have a total or gross heating value of not less than eleven hundred (1100) Btu per cubic foot and not more than thirteen hundred (1300) Btu per cubic foot.

13.6 Renewable Natural Gas ("RNG"), which may come from a variety of sources, including municipal solid waste landfills, digesters at water resource recovery facilities (wastewater treatment plants), livestock farms, food production facilities and organic waste management operations, delivered into Trunkline's pipeline system at Point(s) of Receipt in

Trunkline's pipeline system shall, in addition to the provisions contained in Section 13.1 through 13.5, conform to the following quality standards:

- (A) shall be free of any toxic or hazardous substance including, without limitation, ammonia, sulfides, hydrogen, carbon monoxide, and nonmethane organic compounds that may be hazardous to health, injurious to pipeline facilities, or be a limit to merchantability or be contrary to applicable government standards;
- (B) shall be evaluated on a case by case basis, considering the pipeline operating conditions at and downstream of the receipt location, such as (i) the prevention of any potentially adverse impact to, or unsafe operating condition on Trunkline or any of its existing Shipper's facilities downstream of the point of interconnection, and (ii) the avoidance of any requirement to modify any existing environmental or other permits such as, without limitation, those required to operate Trunkline's compression facilities; and
- (C) RNG to be delivered to and transported on Trunkline's pipeline system shall be subject to periodic testing and monitoring which shall not be less than a quarterly basis.
- (D) Trunkline prohibits RNG from a landfill containing hazardous waste, as defined in Title 40 of the Code of Federal Regulation (CFR) Section 261.3, from being injected into its pipeline system. The operator of a receipt point shall not knowingly supply or cause to supply RNG from a landfill containing hazardous waste. It is the responsibility of the operator of a landfill receipt point to disclose whether the landfill is a site of hazardous waste, has ever been a site of hazardous waste, contains hazardous waste, or ever accepted hazardous waste. Hazardous waste landfills include all and continuous land and structures, and other appurtenances and improvements, on the land used for the treatment, transfer, storage, resource recovery, and disposal or recycling of hazardous waste. The operator of the landfill receipt point shall demonstrate verification from an approved laboratory that the RNG does not originate from hazardous waste before gas flows into Trunkline's pipeline system.