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November 26, 2021

Tanowa Troupe
Secretary
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215

RE: *In re Ohio Gas Company, Case No. 21-583-GA-ATA*

Dear Secretary Troupe:

On May 20, 2021, the Ohio Gas Company ("Ohio Gas" or "Company") filed its Application in the above-captioned proceeding to modify its tariffs and include provisions addressing the potential delivery of renewable natural gas ("RNG") on the Company's system, to ensure that all gas on the system can be delivered in a safe and reliable manner.

In response to Staff's September 21, 2021 Comments, and pursuant to subsequent discussions with Staff, Ohio Gas hereby submits the attached proposed tariffs, which contain incremental revisions to address the issues raised by Staff. For clarity and ease of review, the incremental revisions have been added to the clean proposed tariff sheets originally submitted by the Company in the Application. Any proposed tariff revisions in the Application not changed or affected here should still be considered as the Company originally proposed.

Thank you for your consideration in this matter, and please do not hesitate to contact me with any questions.

Kind regards,

/s/ Matthew R. Pritchard
Matthew R. Pritchard

Counsel for Ohio Gas Company

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SERVICE QUALITY RULES AND REGULATIONS

HEATING CONTENT OF GAS

Pursuant to Section 4933.06, Revised Code, and except as otherwise provided in arrangements approved under Section 4905.31, Revised Code, gas delivered to Customers shall have a heating value of not less than nine hundred (900) Btu per cubic foot when measured in the laboratory by direct heat release or by chemical composition, according to the procedures of the American Society for Testing and Materials or other recognized analytical methods in effect on the effective date of this section. The gas delivered by the Company to Customers may have a heating value that exceeds nine hundred (900) Btu per cubic foot.

DELIVERY OF GAS

Gas may be delivered by or on behalf of a Customer for the consumption of the Company's Customers through interstate pipelines as well as through local points of delivery. Any entity seeking to deliver gas at a point of receipt other than an interstate pipeline shall apply to Ohio Gas for permission to deliver gas locally. An applicant seeking approval for local delivery shall agree to bear the cost of any studies or analyses the Company deems necessary, in its sole judgment, to ensure that such local delivery of gas will occur in a safe, efficient, and reliable manner that will not negatively affect the Company's provision of service to its Customers. The local deliverer shall also bear all expenses the Company identifies as necessary to ensure the safe, reliable, and efficient operation of the Company's system, which may include, but is not limited to shutoffs, pressure regulators, and meter equipment.

The deliverer of local gas may be a Customer of the Company but is not required to be a Customer. so long as the end-use consumer of the local gas delivery is a Transportation Customer of the Company. The deliverer of the local gas must sign an interconnection agreement with the Company, and further agree to abide by all applicable statutory requirements, Commission regulations, and provisions of the Company's tariff prior to delivering any gas locally to the Company.

Deleted: If t

Deleted: is not a Customer of the Company, the deliverer must

Deleted: The local deliverer of gas shall also agree to indemnify and hold Company harmless from any suits, actions, debts, accounts, damages, costs, losses and expenses, including but not limited to, attorneys' fees and expenses, arising from personal injury, death, or damage to Company's equipment or facilities or arising from personal injuries, death, or damage to the facilities, products, or equipment of ¶

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The Company has no obligation to purchase locally delivered gas from an applicant seeking to deliver gas locally, nor does the Company have any obligation to otherwise arrange for the purchase of locally delivered gas.

QUALITY OF GAS

Gas delivered by or on behalf of a Customer to Company at point(s) of receipt other than an interstate pipeline (*i.e.* "locally delivered gas") shall be commercially free from oil, water, air, salt, dust, gum, gum-forming constituents, harmful or noxious vapors, or other solid or liquid matter which might interfere with its merchantability or cause to or interfere with proper operation of the lines, regulators, meters, and other equipment of the Company or its Customers. This provision applies to Renewable Natural Gas as well as any other gas or natural gas delivered locally to the Company's system.

The applicant seeking to deliver gas locally shall bear the costs of testing to ensure compliance with the Company's Quality of Gas standards.

To assure that the gas delivered to Company by Customer, or on behalf of a Customer, for a Customer(s) consumption conforms to the quality specifications of this Section, the locally delivered gas shall be analyzed at the point(s) of receipt from time-to-time as Company deems necessary. The gas delivered shall conform to the following gas quality specifications:

Deleted: Company's other Customers or third parties, or arising from additional hours worked by Company or its other Customers or third parties, caused as a result of the locally delivered gas failing to meet the quality specifications set forth herein.¶¶

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Deleted: Unless the Company is authorized to recover the costs of periodic testing of locally delivered gas through a rider, or obtains an allowance of such costs in base rates, tT

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Gas Quality Parameter Specification	Low	High
Heat Content (Btu/scf) ²	967	1110
Wobbe Number (+/- 4% from historical average gas, which is 1341 – 1383)	1287	1400
Water Vapor Content (lbs./MM scf)		< 7
Product Gas Mercaptans (ppmv, does not include gas odorants)		< 1
Hydrocarbon Dew Point, (°F) CHDP		15
Hydrogen Sulfide (grain/100 scf)		0.25
Total Sulfur (grain/100 scf)		20
Total Diluent Gases including the following individual constituent limits: Carbon Dioxide (CO ₂) 2% max Nitrogen (N) 4% max Oxygen (O ₂) 1% max		5%
Hydrogen		0.3%
Total Bacteria ³ (If no filter installed, then limit is 6.4x10 ⁷ per 100 scf total bacteria)	Comm Free (≤ 0.2 microns)	
Mercury	Comm Free (< 0.06 μ/m ³)	
Other Volatile Metals (Lead)	Comm Free (< 213 μ/m ³)	
Siloxanes as Octamethylcyclotetrasiloxane ⁴	Comm Free (< 0.5 mg Si/m ³)	
Ammonia	Comm Free (< 10 ppmv)	

Gas Quality Parameter Specification	Low	High
Non-Halogenated Semi-Volatile and Volatile Compounds	Comm Free (< 500 ppmv)	
Halocarbons (total measured halocarbons) ⁵	< 3 ppmv	
Aldehyde/Ketones	Aldehydes/Ketones must be at a level that does not unreasonably interfere with odorization of Company's gas.	
PCBs/Pesticides	Comm Free (< 1 ppbv)	

- For purposes of this Tariff, "Commercially Free" is defined as "Not Detectable" relative to typical pipeline gas flowing at the interconnect location that results in the locally delivered gas being compositionally equivalent to flowing supplies. The analytical method, associated detection threshold and testing facility shall be determined by the Company. Periodic testing will be required where potential Constituents of Concern are reasonably expected.
- Higher Heating Value is dry, @ 14.73 pounds per square inch – absolute ("psia") 60 degrees F.
- An acceptable alternative to Total Bacteria testing would be to include installation of a 0.2-micron particulate filter, coupled with appropriate filter maintenance practices. Initial start-up testing may include filter effectiveness analysis. The deliverer of the local gas shall be responsible for

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all costs associated with acceptable alternatives, including, but not limited to, initial start-up testing.

4. Historical testing and data presented in this document include a siloxane detection threshold of $<0.5\text{mg Si/m}^3$. Analytical methods have recently been improved resulting in a reduced detection threshold of $<0.1\text{mg Si/m}^3$. Due to specific limitations of certain identified applications within an affected zone of influence, Company and Customer may agree upon a reduced threshold.
5. Company may refuse to accept gas containing lower levels of halocarbons if Company reasonably determines that such gas is causing harm to its facilities or the gas-burning equipment of its Customers, or is adversely affecting the operation of such facilities. In addition, Company and the local deliverer of gas may agree upon a different specification for halocarbons, provided that (1) the local deliverer of gas has delivered gas locally to Company for a period of at least five years prior to the effective date of this tariff section, and (2) Customer has demonstrated, to the reasonable satisfaction of Company, that the gas meeting the agreed-upon specification will not adversely affect (a) the quality of public utility service provided by Company; (b) the operation of Company's equipment; or (c) the operation of the gas-burning equipment of Company's customers.

As used in the foregoing tables, "Btu" means British thermal unit; "scf" means standard cubic foot; "MM" means one million; "CHDP" means cricondenthem hydrocarbon dew point; "ppmv" means parts per million by volume; and "ppbv" means parts per billion by volume. As used herein, "RNG" or "Renewable Natural Gas" means gas, consistently primarily of methane, which (1) is derived from biogas produced by landfills, animal farms, wastewater treatment plans, or other sources, and (2) is subsequently processed by removing carbon dioxide, nitrogen, and other constituents in order to convert the biogas into pipeline-compatible gaseous fuel.

The Total Heating Value of the locally delivered gas shall be determined by taking samples of the gas at the point(s) of receipt at such reasonable times as may be designated by the Company. The Btu content per cubic foot shall be determined by an accepted type of calorimeter or other suitable instrument for a cubic foot of gas at a temperature of sixty (60) degrees Fahrenheit when saturated with water vapor and at a pressure of 14.73 psia. The initial Btu determination designated by

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the Company shall be made by the Company at its expense. Any additional Btu determinations requested by the deliverer shall be at the deliverer's expense.

The Company may, on a not-unduly discriminatory basis, accept volumes of gas, including renewable natural gas, that fail to meet the quality specifications set forth in this tariff section, if the Company determines that it can do so without adversely affecting (1) system operations; (2) the operation of the Company's equipment; (3) the operation of gas-burning equipment of the Company's other Customers; or (4) the quality of public utility service provided by Company. In deciding whether to accept such volumes of gas, the Company shall consider, without limitation, (1) which specifications are not being met; (2) the sensitivity of Customer equipment and potential impact on such equipment; (3) the deliverer's plan to improve gas quality; (4) the effect on system supply; (5) interchangeability; (6) the anticipated duration of the quality deviation; and (7) the blending ratio between geological natural gas and RNG in the area of the Company's distribution system where RNG is being injected. A request to deviate from the gas quality standards must be made in writing to the Company, and if any studies or analyses need to be conducted to consider the request for deviation, the applicant making such a request shall bear the costs of any such studies or analyses.

The Company shall not be obligated to accept gas which it reasonably believes may adversely affect the standard of public utility service offered by Company, or gas which it reasonably believes may adversely affect the operation of its equipment or the gas-burning equipment of its Customers. If any gas delivered hereunder fails to meet the quality specifications set forth herein, the Company may, at any time, elect to refuse to accept all or any portions of such gas until the local deliverer of gas brings the gas into conformity with such specifications. The Company may also permanently refuse future deliveries of local gas from anyone who materially, or repeatedly, violates these gas quality standards.

Gas delivered locally directly into the Company's facilities shall be at commercial operating pressures sufficient to deliver volumes at regulated pressures at the point(s) of receipt.

GAS QUALITY TESTING

Gas delivered locally to the Company must be continuously monitored, at the deliverer's expense, to ensure it meets the quality specifications. Constituents that

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are not continuously monitored using currently available technology must be tested in a laboratory once per year at deliverer's expense. If the quality of the gas, based on a laboratory test, does not meet the Gas Quality Standards, the gas must be tested in a laboratory monthly, at the deliverer's expense, until the gas meets the standards for three consecutive months or the deliverer otherwise demonstrates to the Company, in the Company's reasonable discretion, that it has remediated the constituent deficiency. Such tests shall include only the test method or methods that test for the specific standard or standards that were not met, but the Company may consider any results provided by such test method(s). The Company will provide the deliverer with at least three (3) business days' notice of the tests described herein. The Company may, at its option, require deliverer to install automatic shutoff devices, at deliverer's expense, to prevent gas that fails to meet the quality specifications set forth herein from entering Company's pipeline system.

The scope of all gas testing shall follow the parameters below based on the origin of the gas. The parameters for each origin of gas are based on the source of gas and likelihood of a constituent being present in the source gas. The Company has the discretion to test for constituents in addition to what is on the list below, notwithstanding the origin of the gas, if the Company reasonably believes those constituents may be present.

Gas Quality Parameter	Testing Method ²	Origin of Gas			
		Geological	Landfill	Agricultural and Clean Energy	Waste-Water Treatment Plant
Heat Content	In-field	X	X	X	X
Wobbe Number	In-field	X	X	X	X
Water Vapor Content	In-field	X	X	X	X
Product Gas Mercaptans	In-field	X	X	X	X
Hydrocarbon Dew Point	In-field	X	X	X	X
Hydrogen Sulfide	In-field or Lab	X	X	X	X
Total Sulfur	In-field or Lab	X	X	X	X
Total Diluent Gases including: Carbon Dioxide (CO ₂) Nitrogen (N) Oxygen (O ₂)	In-field	X	X	X	X
Hydrogen	Lab	X	X	X	X
Total Bacteria	Lab	X	X	X	X
Mercury	Lab		X		X
Other Volatile Metals (Lead)	Lab		X		
Siloxanes	Lab		X		X
Ammonia	Lab		X		X

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Non-Halogenated Semi-volatile and Volatile	Lab		X		X
Halocarbons (total measured halocarbons)	Lab		X		X
Aldehyde/Ketones	Lab		X		
PCBs/Pesticides	Lab		X		

1. Constituents to be tested for each category of gas are indicated with an "X."
2. Testing method is defined as "In-Field" or "Lab." "In-Field" testing requires the deliverer's use of readily available, continuously testing, industry-standard equipment, which has been reviewed and approved by Company. "Lab" testing requires the deliverer and the Company to coordinate the sampling of gas and sending it to a laboratory for testing and analysis.

MEASUREMENT OF GAS DELIVERIES

When the Company receives a Customer's gas at a point(s) of receipt with an interstate pipeline, all measurements shall be performed in accordance with the terms of the Company's standard practices.

When Company receives a Customer's gas directly into its system, from point(s) of receipt other than those with an interstate pipeline, the Company shall read the meter, furnish, place, and remove all recording charts, and calculate the deliveries at no cost to the deliverer except as provided herein. ~~The deliverer shall pay for the full cost of the meter, which will be owned by the Company.~~

Deleted: Unless Company has a rider to collect costs associated with local deliveries, or there is an allowance to recover such costs through the Company's base rates, tT

Should the deliverer challenge the accuracy of the measuring device or devices used, the Company shall test the meter. A representative of deliverer may be present at the test. If the measuring equipment is found to be in error, and the resultant aggregate error in computed deliveries at the recording rate corresponding to the average hourly rate of gas flow for the period since the

preceding test is not more than two percent (2%), then previous deliveries shall be considered accurate, and deliverer shall pay the cost of testing the meter. If, however, any measuring equipment is found to be in error, and the resultant aggregate error in computed deliveries exceeds the two percent (2%) tolerance, the cost of testing the meter shall be borne by the Company. All equipment shall, in any case, be adjusted at the time of testing to record correctly. If a meter test identifies a meter that is not within the tolerances set forth in this paragraph, the

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Company shall have no obligation to the deliverer of the local gas except with respect to making an estimate of the adjusted volumes for a period not to exceed 30 days prior to the request for the meter test. The Company shall have no financial obligation to the deliverer of the local gas in the event a meter used to measure locally delivered gas is determined to not be within the tolerances set forth in this paragraph. The Company shall have no obligation (financial or otherwise) to any other party whatsoever for any meter associated with measuring locally delivered gas that is not operating within the tolerances set forth in this provision.

Upon written request from the deliverer of the local gas, the Company shall forward copies of meter charts to the deliverer for inspection. The Company shall keep the original meter charts on file for three (3) years after the date of delivery, during which time they will be open for inspection by the deliverer upon prior request.

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Summary: Correspondence Regarding Revised Proposed RNG Tariff Provisions
electronically filed by Ms. Rebekah J. Glover on behalf of Ohio Gas Company