

STATE OF NORTH CAROLINA UTILITIES
COMMISSION
RALEIGH

DOCKET NO. G-9, SUB 698
DOCKET NO. G-9, SUB 699
DOCKET NO. G-9, SUB 701
DOCKET NO. G-9, SUB 726
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DOCKET NO. G-9, SUB 764

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

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| In the Matter of |) | |
| Application of Piedmont Natural Gas |) | RESPONSES OF FOOTHILLS |
| Company, Inc. for Approval of Appendix F to |) | RENEWABLES LLC TO |
| its North Carolina Service Regulations |) | COMMISSION QUESTIONS |
| |) | |

Pursuant to the Commission’s *Order Requiring Information About Status of Renewable Natural Gas Projects* issued March 31, 2022, in the above-referenced dockets, Foothills Renewables, LLC (“Foothills”) responds to the Commission’s questions as follows:

1. Describe the types of RNG (landfill gas, swine waste, poultry waste, etc.), the percentage of each type of RNG, and the quantities and pressures of RNG to be supplied at all interconnection points and injection points (collectively, interconnection points).

Response: The Foothills Facility utilizes 100% landfill gas to produce Alternative Natural Gas. Alternative Natural Gas produced by the Facility is transported via tanker truck to a single injection point on the Piedmont Natural Gas (PNG) system, approximately 17 road miles from the Facility. Although the amount varies from day to day, the Receipt Interconnect Agreement (“RIA”) between Foothills and PNG authorizes the injection of up to 150 dekatherms (Dth) of Alternative Gas per hour and a total maximum daily quantity of Alternative Gas up to 1900 Dth per day, at a standard pipeline injection pressure between 350 and 800 PSIG.

2. State the size and operating pressure of Piedmont’s pipeline at all planned interconnection points.

Response: Foothills lacks information sufficient to provide a definitive answer to this question.

3. State the current winter and summer volumes on Piedmont’s pipeline at all planned interconnection points.

Response: Foothills lacks information sufficient to provide a definitive answer to this question.

4. State the number of farms and other providers that have been contracted with to provide RNG.

Response: The Facility has contracted with the Foothills Regional Municipal Solid Waste (“MSW”) Landfill to provide landfill gas to the Facility. Because the Foothills Facility produces Alternative Natural Gas from landfill gas, no farms have been contracted with.

5. Provide the details of your plans for selling RNG, including: (a) The name(s) and location(s) of the buyers, (b) whether the buyer(s) will be end users of the RNG or will resell it to another entity, and (c) the manner in which the price of the RNG will be determined.

Response: [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

6. Describe the status of any negotiations with Piedmont for entering into a receipt interconnect agreement (RIA), and state when you anticipate entering into an RIA.

Response: Foothills executed an RIA with Piedmont on April 4, 2019.

7. Describe the current construction status of your RNG facility.

Response: The Facility is currently under construction, with completion expected in late Q3 or early Q4 2022.

8. State the projected date for commercial operation of your RNG facility.

Response: Project commissioning and the commencement of commercial operation are projected to occur in mid-Q4 2022.

Respectfully submitted, this the 19th day of May 2022.

FOX ROTHSCHILD LLP

By: 

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CERTIFICATE OF SERVICE

I do hereby certify that I have served a copy of the foregoing Response of Foothills Renewables LLC upon each of the parties of record in this proceeding, or their attorneys of record, by e-mailing a copy of same or by causing a paper copy of same to be hand-delivered or deposited in the United States Mail, postage prepaid, properly addressed to each.

This 19th day of May 2022.

Electronically Submitted

/s/ Benjamin L. Snowden

Benjamin L. Snowden

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