



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

January 22, 2024

Ms. A. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
4325 Mail Service Center
Raleigh, North Carolina 27699-4300

Re: Docket No. G-9, Sub 764 – Application of Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas, for Approval to Participate in Piedmont Natural Gas Company, Inc.'s Appendix F Pilot Program

Dear Ms. Dunston,

On January 3, 2024, Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas (Align), filed its Motion to Amend Order Approving Participation in Pilot Program with Conditions (Motion) in the above-referenced docket. The Commission approved Align's original application to participate in the Piedmont Appendix F Alternative Gas pilot program (Pilot Program) by order issued April 3, 2020. On June 4, 2020, the Commission issued an order approving Align's Receipt Interconnect Agreement (RIA) with Piedmont Natural Gas Company, Inc. (Piedmont), with conditions.

In its Motion, Align states that it has completed construction of most of the facilities that make up Phase I of the project, which consisted of 19 farms and production facilities, 30 miles of gathering pipeline, and a central upgrading facility to supply methane generated from swine manure to produce approximately 330,000 MMBTUs of alternative gas. Align further states in its Motion that it plans to construct additional production and upgrading facilities and approximately 50 miles of gathering pipeline on up to 35 additional farms. According to the Motion, Phase II will generate alternative gas using the same methane source as Phase I and a similar upgrading process, although Phase II will utilize multiple, smaller scale upgrading facilities instead of one central upgrading facility. Align states that this will result in the alternative gas produced by both phases of the project having identical characteristics and constituents. Phase I and Phase II will also utilize the same point of interconnection with Piedmont's pipeline. Align states that it contemplated the construction of Phase II when it negotiated its RIA with Piedmont

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A. Shonta Dunston
January 22, 2024
Page Two

and, therefore, Phase II will comply with the Commission-approved RIA and with the requirements of Appendix F of Piedmont's North Carolina Service Regulations.

Align states in its Motion that, in addition to promoting the public policy goals identified in its original application to participate in the Pilot Program, Phase II of its project will provide the Commission with data on daily alternative gas quantities generated by multiple upgrading facilities, the operation of a network of alternative gas facilities, and the impacts of even larger-scale volumes of alternative gas to upstream pipelines and infrastructure.

Based on its review of Align's Motion and the other filings in the docket, the Public Staff does not object to the relief requested by Align in its Motion.

I am forwarding a copy of this letter to all parties of record.

Sincerely,

Electronically submitted
/s/Megan Jost
Staff Attorney
megan.jost@psncuc.nc.gov

cc: Parties of Record

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