

May 10, 2022

VIA Electronic Filing

Ms. Shonta Dunston, Chief Clerk
North Carolina Utilities Commission
Dobbs Building
430 North Salisbury Street
Raleigh, North Carolina 27603

*Re: Response to Order Requiring Information
Docket Nos. G-9, Sub 698 and G-9, Sub 764*

Dear Ms. Dunston:

Enclosed on behalf of Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas ("Align RNG"), is the Response to Order Requiring Information About Status of Renewable Natural Gas Projects ("Response") for filing in the above-referenced proceeding.

A portion of the Response contains confidential information. Pursuant to N.C.G.S. § 132-1.2, Align RNG requests that this information be protected from public disclosure. Information designated by Align RNG as confidential qualifies as "trade secret" under N.C.G.S. § 66-152(3). Pursuant to N.C.G.S. § 132-1.2, Align RNG has redacted this confidential information from the public version of this filing and is filing the confidential information contemporaneously under seal.

Thank you for your assistance with this matter. If you have any questions regarding this filing, you may reach me at the number shown above.

Sincerely,

/s/Kristin M. Athens

KMA:kjg

Enclosure

**STATE OF NORTH CAROLINA
UTILITIES COMMISSION
RALEIGH**

DOCKET NO. G-9, SUB 698
DOCKET NO. G-9, SUB 764

BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

In the Matter of

Application of Piedmont Natural Gas)	
Company, Inc. for Approval of Appendix F)	
to its North Carolina Service Regulations)	
)	RESPONSE TO ORDER REQUIRING
In the Matter of)	INFORMATION ABOUT STATUS
)	OF RENEWABLE NATURAL GAS
Application of Align RNG North Carolina,)	PROJECTS
LLC, d/b/a Align Renewable Natural Gas,)	
for Approval to Participate in Piedmont)	
Natural Gas Company, Inc.'s Appendix F)	
Pilot Program)	

On March 31, 2022, the North Carolina Utilities Commission ("Commission") issued an *Order Requesting Information About Status of Renewable Natural Gas Projects* ("Order"). Align RNG North Carolina, LLC, d/b/a Align Renewable Natural Gas ("Align RNG"), hereby responds to the Commission's request below.

- 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: Align RNG BF Grady Road project conditions, purifies, and transports biogas derived from swine waste to be delivered into Piedmont Natural Gas Company, Inc.'s ("Piedmont") pipeline as renewable natural gas ("RNG"), which qualifies as "Alternative Gas" under Piedmont's Appendix F. Per the

executed Receipt Interconnect Agreement (“RIA”) between Align RNG and Piedmont, the maximum allowable delivery quantity is set at [BEGIN

CONFIDENTIAL] [REDACTED] [END

CONFIDENTIAL] The Alternative Gas will be delivered, per the requirements of the RIA, “at a pressure sufficient to enter Piedmont’s system without disruption to the operation of that system.”

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

Response: This question pertains to line sizing and pressures on Piedmont’s pipelines, and Align RNG, therefore, respectfully defers this question to Piedmont.

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

Response: This question pertains to volumes on a pipeline owned and operated by Piedmont that Align RNG is not privy to, and Align RNG, therefore, respectfully defers this question to Piedmont.

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

Response: Align RNG’s BF Grady Road Project is designed to connect with nineteen North Carolina farms that supply swine manure for anaerobic digesters that capture biogas. The biogas captured from these farms’ swine manure is processed at a centralized gas upgrading system that produces Alternative Gas and interconnects to Piedmont’s pipeline. Of those nineteen farms, three have

received the necessary Department of Environmental Quality (“DEQ”) permits for digester installation and are in various stages of biogas production. The remaining sixteen farms are anticipated to begin biogas production pending receipt of the necessary DEQ permits and construction of their digesters.

- 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: Align RNG, through its Agent, plans to sell Alternative Gas to North Carolina utilities. The pricing of the Alternative Gas will be reflective of the current market rates. The environmental attributes will be unbundled from the Alternative Gas prior to the sale of such gas to the North Carolina utilities.

- 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: Align RNG has executed an RIA with Piedmont and received approval of the RIA from the Commission by Order issued June 4, 2020, in Docket No. G-9, Sub 764. No other RIAs are under negotiation with Piedmont.

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

Response: Align RNG’s BF Grady Road project facilities’ central components are mechanically complete. This includes a biogas gathering pipeline, the central gas upgrading facility, and compression facilities adjacent to the injection point

with Piedmont. Align RNG anticipates startup and commissioning activities to take place in the second and third quarters of 2022.

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

Response: Align RNG expects the BF Grady Road project to enter commercial operation in the third quarter of 2022.

Respectfully submitted, this the 10th day of May, 2022.

/s/Kristin M. Athens

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Carolina, LLC, d/b/a Align Renewable
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Response to Order Requiring Information About Status of Renewable Natural Gas Projects, as filed in Docket Nos. G-9, Sub 698 and G-9, Sub 764, were served electronically or via U.S. mail, first-class, postage prepaid, upon all parties of record.

This, the 10th day of May, 2022.

/s/Kristin M. Athens

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