



**NORTH CAROLINA
PUBLIC STAFF
UTILITIES COMMISSION**

June 29, 2021

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

Re: Docket No. G-9, Sub 728

Dear Ms. Dunston:

On February 15, 2021, GESS RNG Biogas USA, LLC (GESS RNG) filed a motion requesting that the Commission amend its Order Approving Participation in Pilot Program with Conditions issued March 11, 2019, to include (1) GESS RNG in the pilot program established by the Commission in its Order Approving Appendix F and Establishing Pilot Program issued June 19, 2018, in Docket No. G-9, Sub 698, and (2) an additional seven anaerobic digestion facilities in the pilot program.

The Public Staff files this letter in accordance with the Commission's Order Requesting Additional Information and Comments issued April 9, 2021, and Order Granting Motion for Extensions of Time issued June 10, 2021, in Docket Nos. G-9, Sub 728 and SP-13243, Sub 0.

The Public Staff has reviewed the motion filed by GESS RNG and has no objection to GESS RNG participating in the pilot program and the inclusion of the additional anaerobic digestion facilities in the pilot program, subject to the Commission's approval of a receipt interconnect agreement between GESS RNG and Piedmont.

Additionally, the North Carolina Renewable Energy Tracking System (NC-RETS) Operating Procedures approved by the Commission in Docket No. E-100, Sub 121, contain Appendix C regarding multi-fuel projects. As GESS RNG anticipates that its facilities will have multiple types of feedstocks, it has begun working with the Public Staff to develop the calculations necessary to determine the energy content of each feedstock. The Public Staff recommends that GESS RNG continue its work with the Public Staff and

Executive Director
(919) 733-2435

Accounting
(919) 733-4279

Consumer Services
(919) 733-9277

Economic Research
(919) 733-2267

Energy
(919) 733-2267

Legal
(919) 733-6110

Transportation
(919) 733-7766

Water/Telephone
(919) 733-5610

Ms. A. Shonta Dunston
June 29, 2021
Page Two

file the final calculations with the Commission before delivering renewable gas to Piedmont.

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

Sincerely,

Electronically submitted
/s/ Elizabeth D. Culpepper
Staff Attorney
elizabeth.culpepper@psncuc.nc.gov

c: Parties of Record