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May 23, 2023

Via e-Filing

Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
888 First Street, N.E., Room 1A
Washington, DC 20426

Re: Florida Gas Transmission Company, LLC
Docket No. RP23-466-000
Technical Conference Presentation

Dear Ms. Bose:

Please find attached a copy of Florida Gas Transmission Company, LLC's technical conference presentation.

If you have any questions, please do not hesitate to contact me at (202) 220-6922. Thank you.

Respectfully submitted,

FLORIDA GAS TRANSMISSION COMPANY, LLC

/s/ Thomas E. Knight
Thomas E. Knight
Attorney for Florida Gas Transmission Company, LLC

cc: Service List

RNG QUALITY TARIFF PROVISIONS

Docket No. RP23-466-000

Florida Gas Transmission Company

An Energy Transfer/Kinder Morgan Affiliate

BACKGROUND

- 02/01/2021 – Florida Gas filed revised tariff records pursuant to the Section 4 Rate Case in Docket No. RP21-441-000.
- 01/18/2022 – Florida Gas filed the Settlement related to Docket Nos. RP21-441-000, et al. which resolved all issues except RNG matters (that arose during settlement discussions) and provided procedures for the resolution of RNG matters and the filing of the RNG Settlement.
- 02/18/2022 – Presiding Judge certified the Settlement to the Commission which provided that for a period not to exceed 60 days, the Settling Parties would conduct negotiations to reach consensus on RNG-related tariff language.
- 05/10/2022 – At a settlement conference, Florida Gas and certain of the active parties in the proceeding reached a comprehensive settlement in principle that addressed the RNG matters in this proceeding. Other parties did not support the filing.
- 05/16/2022 – Florida Gas filed a contested settlement related to RNG tariff matters.
- 08/08/2022 – Settlement Judge issued a report that under Commission precedent, she cannot certify a contested offer, so the RNG Settlement went before the Commission for consideration.
- 02/27/2023 – Florida Gas withdrew the contested settlement related to RNG tariff matters.
- 02/27/2023 – Florida Gas filed RNG Tariff Provisions in Docket No. RP23-466-000.
- 03/13/2023 – Protests were filed in Docket No. RP23-466-000.
- 03/29/2023 – Commission issued an Order Accepting and Suspending Tariff Records Subject to Refund, and Establishing Hearing Procedures, Including a Technical Conference 182 FERC ¶ 61,204.

FGT TARIFF FILING

- Tariff filing seeks to implement quality standards for Renewable Natural Gas (RNG) that are consistent with standards approved by the FERC in the *Great Basin* case.

- FGT included supporting data that provided the technical basis of the filing, addressing the issue raised by the FERC Staff that the prior RNG Settlement did not have supporting data in the record to allow a FERC decision.

- RNG contains constituents that are not commonly found in conventionally produced natural gas, and the effects of these compounds must be carefully monitored.

FGT TARIFF FILING (CONT'D)

- Testing requirements are included in the tariff language as required by prior FERC orders

- Over time, specific constituents in raw biogas may appear or disappear and/or change in quantity. FGT views testing as key to determining the long-term safe receipt and delivery of RNG

OUR TEAM

Dennis Alters

Sr. Director of Facility Planning

- 45 years of experience in the Natural Gas Industry
- Bachelor of Arts in Metals / Management – Morehead State University, 1977
- Broad spectrum of experience in several areas including Facility Planning, Business Development, Gas Measurement, Pipeline Design and Operations, Compression, Corrosion, Controls, IT, Administration, Safety, Security and Purchasing

Timothy Beary

Director of Measurement Technical Services

- 22 years of experience in the Energy Industry
- Bachelor of Science in Biology / Minor in Biochemistry – Nicholls State University, 1985
- PhD in Microbiology / Minor in Biochemistry – Louisiana State University, 1993
- Post-Doctoral Fellowship at University of Pittsburg Medical Center, 1993-1996

Eric Arnett

Manager of Measurement Technical Services

- 22 years of experience in Gas Measurement
- Associates of Applied Science in Instrumentation and Electricity – State Technical College of Missouri
- Advisory Member of Gas Training Association

Rick Kroeker

Principal Engineer of Measurement Technical Services

- 32 years of experience in the Oil & Gas Industry
- Bachelor of Science in Physics / Minor in Mathematics – Bethel College, 1981
- Master of Science in Mechanical Engineering – Oklahoma State University, 1983
- Professional Engineer, 1992

DOCKET NO. RP23-466-000

➢ Basis for permissible limits

- Southern California Gas Company – Rule No. 45 – Standard Renewable Gas Interconnection – Effective October 28, 2020

  https://tariff.socalgas.com/regulatory/tariffs/tm2/pdf/tariffs/GAS_G-RULES_45.pdf

- Great Basin Gas Transmission Company – Docket Nos. RP22-432-000, et al. – Approved via Letter Order – Effective April 1, 2022

- Energy Transfer Standard Operating Procedure D.39 – Bacterial Corrosion Tests (49 CFR 192.475, 192.477)

  192.475 https://www.law.cornell.edu/cfr/text/49/192.475
  192.477 https://www.law.cornell.edu/cfr/text/49/192.477

DOCKET NO. RP23-466-000 (CONT'D)

➢ Basis for permissible limits (continued)

- Gas Technology Institute Final Report #GTI-12/0007 Guidance Document for the Introduction of Landfill-Derived Renewable Gas Into Natural Gas Pipelines (2012)
  https://www.gti.energy/wp-content/uploads/2018/09/120007_Landfill_Guidance_Document_FINALREPORT-05-9-2012.pdf

- Northeast Gas Association and Gas Technology Institute, Interconnect Guide for Renewable Natural Gas (RNG) in New York State (2019)
  https://www.northeastgas.org/pdf/nga_gti_interconnect_0919.pdf

- Northeast Gas Association and Gas Technology Institute, Interconnect Guide for Emerging Fuels into Energy Delivery Networks, Introduction of Renewable Natural Gas (RNG) and Hydrogen Enriched Natural Gas (HENG) (2022)

- California Environmental Protection Agency – Air Resources Board, Recommendations to the California Public Utilities Commission Regarding Health Protective Standards for the Injection of Biomethane in the Common Carrier Pipeline, prepared by Staff of the California Air Resources Board and the Office of Health Hazard Assessment (2013)
  https://oehha.ca.gov/media/final_ab_1900_staff_report_appendices_051513.pdf

PERMISSIBLE LIMITS COMPARISON

			California Air Resources Board			SoCal Gas Rule #45-Standard Renewable Gas Interconnection. Effective Oct. 28,2020			NGA / GTI 2022
	FGT RNG Tariff Limits	Great Basin Tariff Limits	Trigger	Lower Action Level	Upper Action Level	Trigger	Lower Action Level	Upper Action Level	Limits
	mg/m3 (PPMv)	mg/m3	mg/m3 (PPMv)	mg/m3 (PPMv)	mg/m3 (PPMv)	mg/m3 (PPMv)	mg/m3 (PPMv)	mg/m3 (PPMv)	mg/m3 (PPMv)
Alkyl Thiols (Mercaptans)	(610)	610 PPMv	N/A (12)	N/A (120)	N/A (610)	N/A (12)	N/A (120)	N/A (610)	(1)
Ammonia	7 (10)	0.001%				3 (0.0004%)	7 (0.001%)	18 (0.0025%)	7 (10)
Antimony	30 (6.1)	30 mg/m^3	0.60 (0.12)	6.0 (1.2)	30 (6.1)	0.60 (0.12)	6.0 (1.2)	30 (6.1)	
Arsenic	0.48 (0.15)	0.48 mg/m3	0.019 (0.006)	0.019 (0.006)	0.48 (0.15)	0.019 (0.006)	0.019 (0.006)	0.48 (0.15)	
Copper (Dusts and mists)	3.0 (1.2)	3 mg/m3	0.060 (0.02)	0.60 (0.23)	3.0 (1.2)	0.060 (0.02)	0.60 (0.23)	3.0 (1.2)	
Ethyl benzene	650 (150)	650 mg/m3	26 (6.0)	260 (60)	650 (150)	26 (6.0)	260 (60)	650 (150)	
Lead	3.8 (0.44)	3.8 mg/m3	0.075 (0.009)	0.75 (0.09)	3.8 (0.44)	0.075 (0.009)	0.75 (0.09)	3.8 (0.44)	
Mercury	0.08 (0.0094)	0.08 mg/m3				0.08	TBD	TBD	0.00006
Methacrolein	53 (18)	53 mg/m3	1.1 (0.37)	11 (3.7)	53 (18)	1.1 (0.37)	11 (3.7)	53 (18)	
n-Nitroso-di-n-propylamine	0.81 (0.15)	0.81 mg/m3	0.033 (0.006)	0.33 (0.06)	0.81 (0.15)	0.033 (0.006)	0.33 (0.06)	0.81 (0.15)	
p-Dichlorobenzene	140 (24)	140 mg/m3	5.7 (0.95)	57 (9.5)	140 (24)	5.7 (0.95)	57 (9.5)	140 (24)	
Siloxanes	0.1 mg Si / m^3	0.1 mg Si/M3				0.05 mg Si/m3	0.1 mg Si/m3	0.3 mg Si/m3	0.1 mg Si/m3
Toluene	45,000 (12,000)	45,000 mg/m3	904 (240)	9,000 (2,400)	45,000 (12,000)	904 (240)	9,000 (2,400)	45,000 (12,000)	
Vinyl Chloride	21 (8.3)	21 mg/m3	0.84 (0.33)	8.4 (3.3)	21 (8.3)	0.84 (0.33)	8.4 (3.3)	21 (8.3)	
Hydrogen	0.1% (1000)	0.1%				0.10%	TBD	TBD	
Microbiological Organisms	100 colonies/ml liquid*	Total < 4x10^4/scf				Total < 4x10^4/scf			0.2 micron filter

* Energy Transfer Standard Operating Procedure D.39-Bacterial Corrosion Tests (49 CFR 192.475, 192.477)

Selected Limits

PERMISSIBLE LIMITS OF FLORIDA GAS

FGT's RNG Quality Specifications Table

Constituent	Permissible Limits mg/m³ (PPMv)	Landfill/ POTW	Organic Biomass	Testing Methods
Alkyl Thiols (Mercaptans)	(610)	Periodic	Periodic	ASTM D6228
Ammonia	7 (10)	Periodic	Periodic	NIOSH 3800
Antimony	30 (6.1)	Periodic		NIOSH 7303
Arsenic	0.48 (0.15)	Periodic		NIOSH 7303
Copper	3 (1.2)	Periodic		NIOSH 7303
Ethyl benzene	650 (150)	Periodic	Periodic	EPA TO-14A, TO-15
Hydrogen	0.1% (1000)	Periodic	Periodic	ASTM D1945
Lead	3.8 (0.44)	Periodic		NIOSH 7303
Mercury	0.08 (0.0094)	Periodic		NIOSH 6009
Methacrolein	53 (18)	Periodic		EPA TO-15
n-Nitroso-di-n-propylamine	0.81 (0.15)	Periodic	Periodic	EPA 3542, 8270
p-Dichlorobenzene	140 (24)	Periodic		EPA TO-14A, TO-15
Microbiological Organisms (APB, SRB, IOB)	100 colonies/ml liquid	Periodic	Periodic	Tariff Section 2.A.11
Siloxanes	0.1 mg Si / m^3	Continuous		ASTM D8230
Toluene	45,000 (12,000)	Periodic	Periodic	EPA TO-14A, TO-15
Vinyl Chloride	21 (8.3)	Periodic		EPA TO-14A, TO-15

As set out in the Tariff, Periodic Testing will be required for constituents shown in the above table even if the constituents are continuously monitored.

FGT ANALYSIS

- Analysis has been performed within FGT's Market Area.

- FGT has analyzed the natural gas in the existing system and verified that the current natural gas within the pipeline does not contain amounts of constituents greater than the permissible limits for RNG.

- Analysis also has been performed on recently connected RNG receipts. Such analysis shows the existence of various constituents that are set out in the Quality specifications in the RP23-466 tariff filing.

FGT TEST RESULTS

	Constituent	Florida Gas Transmission Tariff Limits	Transmission Pipeline	Landfill Sample #1	Landfill Sample #2	Biogas Sample #1	Biogas Sample #2
			10/5/2022	6/1/2022	10/4/2022	11/3/2022	11/12/2022
Tariff Constituents	Heating Value	950-1110 BTU/SCF	1015.72	982.7	984.89	1001.88	1001.38
	Carbon Dioxide*	2%	1.1711	0.89	0.9427	0	0
	Nitrogen*	3%	0.8562	2.05	1.5567	0.804	0.8536
	Hydrogen Sulfide	0.25 grain/100 SCF	0.019	0	<0.006	0	0
	Total Sulfur	2 grain/100 SCF	0.04	0.011	0.03	0	0
	Oxygen	0.25% (2500 PPMv)	ND	0.18	ND	0	0
	Water	7 lbs./MMSCF				7.6	3.6
	Methane	>85 %	94.8643	96.9	97.4893	99.196	99.14636
	Ethane	<10 %	2.8611	0	ND	0	0
	Hydrocarbon Dew Point	<20F	-68		-115	-83	-83
	Wobbe Index	1320-1396	1327.4685	1298.3	1305.0	1342.1	1341.2
		mg/m3 (PPMv)	mg/m3	mg/m3	mg/m3	mg/m3	mg/m3
RNG Constituents	Alkyl Thiols (Mercaptans)	(610)	<0.1	0	<0.1	0	0
	Ammonia	7 (10)	ND		ND	0	0.0724
	Antimony	30 (6.1)	ND		ND	0	0
	Arsenic	0.48 (0.15)	<RL		<RL	0	0
	Copper (Dusts and mists)	3.0 (1.2)	0.000003		0.000003	0.004	0.002
	Ethyl benzene	650 (150)	<RL		ND	0	0
	Lead	3.8 (0.44)	ND		<RL	0	0
	Mercury	0.08 (0.0094)	0.0000732		0.001697	0	0
	Methacrolein	53 (18)	4.346		ND	0.0000589	0.0000388
	n-Nitroso-di-n-propylamine	0.81 (0.15)	0.00814075		0.00059116	0	0
	p-Dichlorobenzene	140 (24)	<RL		<RL	0	0
	Siloxanes	0.1 mg Si / m3	0.029372	0.02	0.035082	0.016759	0.007155
	Toluene	45,000 (12,000)	5.594		ND	0	0
	Vinyl Chloride	21 (8.3)	1.649		4.808	0	0
	Hydrogen	0.1% (1000)	0.0057		0.0035		

* Total inerts (carbon dioxide and nitrogen) cannot combine to be more than 3% by volume

ND=Not Detected

<RL= less than reporting limit

WOBBE INDEX

RNG Gas Chromatograph Analysis

% Inerts		CH_4	HHV*	Wobbe*	SG
N_2	CO_2		@14.73	@14.73	@14.73
0	0	100	1014.35	1362.92	0.5539
0	1	99	1004.23	1337.72	0.5636
0	2	98	994.11	1313.04	0.5732
1	0	99	1004.18	1344.25	0.5580
1	1	98	994.06	1319.35	0.5677
1	2	97	983.95	1294.95	0.5773
2	0	98	994.01	1325.74	0.5622
2	1	97	983.90	1301.12	0.5718
3	0	97	983.84	1307.39	0.5663

At RNG Tariff minimum HHV	950	**1250.28**	0.5773

* If RNG contains any C2 or greater, the HHV and Wobbe will increase.

QUALITY MONITORING REQUIREMENTS

➢ Online Analyzers

- The analyzer and associated sample conditioning systems shall be installed per manufacturer's specifications and accepted industry standards/practices. Energy Transfer Measurement Technical Services shall verify the installation prior to injection into the pipeline.
- The signals from all online analyzers shall be connected directly to the Florida Gas Transmission Electronic Flow Meter (EFM).
- Florida Gas Transmission shall be notified and afforded the opportunity to witness all analyzer calibrations/verifications.
- The required online analyzers are shown on the next slide. The manufacturer/model of the analyzers must be approved by Energy Transfer Measurement Technical Services.

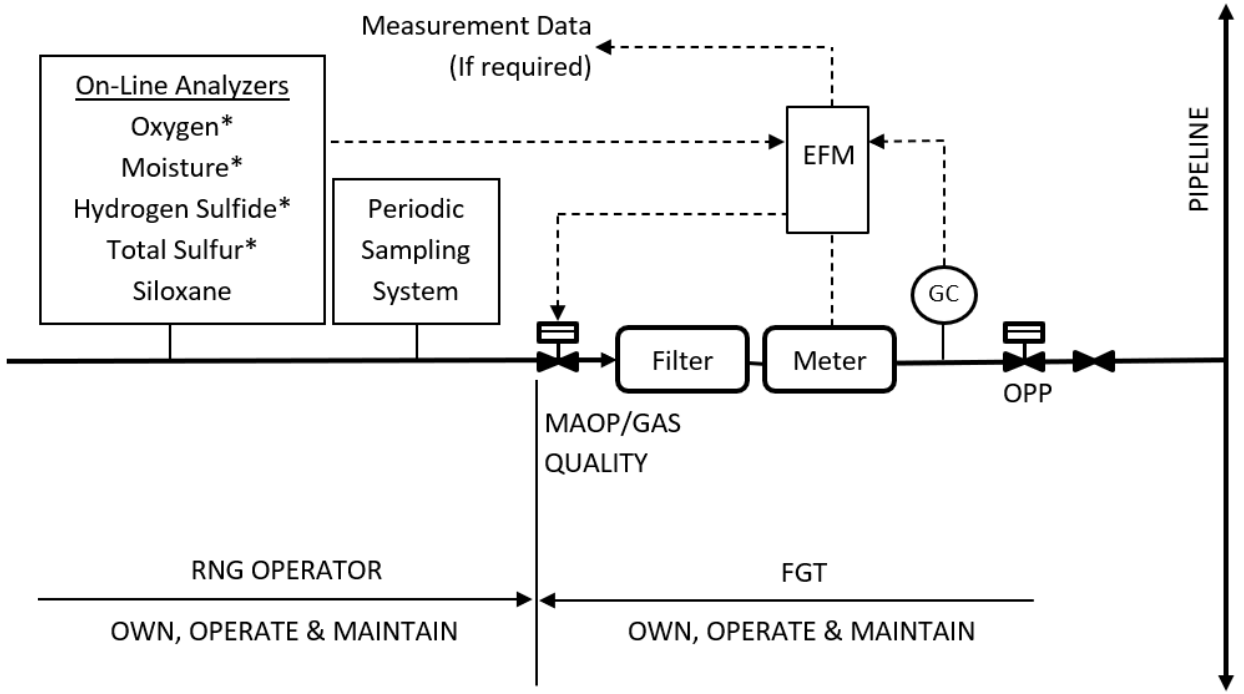
QUALITY MONITORING REQUIREMENTS (CONT'D)

	Facilities/ Equipment	Approved Equipment	Design, Specs, Drawings	Procurement, Construction, Installation	Ownership	Capital Cost Responsibility	Operate, Maintain	O&M Cost Responsibility
Standard Receipt Facilities	Coalescing Filter	Various	FGT	FGT	FGT	RNG	FGT	FGT
	Meter	Project Dependent	FGT	FGT	FGT	RNG	FGT	FGT
	Gas Chromatograph	ABB NGC8206, Emerson 370XA	FGT	FGT	FGT	RNG	FGT	FGT
	Shut-Off Valve	Various	FGT	FGT	FGT	RNG	FGT	FGT
	Over-Pressure Protection	Various	FGT	FGT	FGT	RNG	FGT	FGT
	Moisture Analyzer	Various*	RNG	RNG	RNG	RNG	RNG	RNG
	H2S Analyzer**	Various*	RNG	RNG	RNG	RNG	RNG	RNG
RNG Receipt Facilities	Oxygen Analyzer	Various*	RNG	RNG	RNG	RNG	RNG	RNG
	Total Sulfur Analyzer**	Various*	RNG	RNG	RNG	RNG	RNG	RNG
	Siloxane Analyzer	Ohio Lumex Ei2300	RNG	RNG	RNG	RNG	RNG	RNG
	Periodic Sampling System	Ohio Lumex SS-GF-ST-310	RNG	RNG	RNG	RNG	RNG	RNG

* ETC Measurement Technical Services Approval

** Periodic sampling may be utilized if approved by ETC Measurement Technical Services

TYPICAL RNG RECEIPT SCHEMATIC



Note, this schematic depicts a conceptual layout. The actual site-specific design may differ from schematic.

* ETC Measurement Technical Services Approval

CONTINUOUS TESTING

FGT Tariff Limits

FGT Tariff Limits			Landfill, POTW, Other	Organic Biomass	Monitor Responsibility
	Western Area	Market Area			
Heating Value	RNG >950 BTU/SCF and pipeline blend >1000 BTU/SCF		Continuous	Continuous	FGT
	>1000 BTU/SCF	1000-1110 BTU/SCF			
Carbon Dioxide*	2%		Continuous	Continuous	FGT
Nitrogen*	3%		Continuous	Continuous	FGT
Hydrogen Sulfide	0.25 grain/100 SCF		Continuous	Continuous	RNG
Total Sulfur	10 grain/100 SCF	2 grain/100 SCF	Continuous		RNG
Oxygen	0.25%		Continuous	Continuous	RNG
Water	7 lbs./MMSCF		Continuous	Continuous	RNG
Methane		>85 %	Continuous	Continuous	FGT
Ethane		<10%	Continuous	Continuous	FGT
Gas Temperature	<120 F		Continuous	Continuous	FGT
Hydrocarbon Dew Point		C4+ < 1.2% HCDP <25F	Continuous	Continuous	FGT
Wobbe Index		1320-1396	Continuous	Continuous	FGT

* Total inerts (carbon dioxide and nitrogen) cannot combine to be more than 3% by volume

PERIODIC TESTING

- RNG Operator and Transporter/Florida Gas shall agree upon an independent, certified third-party lab(s) and testing protocols that RNG Operator shall employ for sampling and lab testing. Constituents to be monitored include:

RNG Quality Limits

Constituent	Permissible Limits[1] mg/m³ (PPM_V)	Landfill/ POTW	Organic Biomass	Monitor Responsibility
Alkyl Thiols (Mercaptans)	(610)	Periodic	Periodic	RNG
Ammonia	7 (10)	Periodic	Periodic	RNG
Antimony	30 (6.1)	Periodic		RNG
Arsenic	0.48 (0.15)	Periodic		RNG
Copper	3 (1.2)	Periodic		RNG
Ethyl benzene	650 (150)	Periodic	Periodic	RNG
Hydrogen[2]	0.1% (1000)	Periodic	Periodic	RNG
Lead	3.8 (0.44)	Periodic		RNG
Mercury	0.08 (0.0094)	Periodic		RNG
Methacrolein	53 (18)	Periodic		RNG
n-Nitroso-di-n-propylamine	0.81 (0.15)	Periodic	Periodic	RNG
p-Dichlorobenzene	140 (24)	Periodic		RNG
Siloxanes	0.1 mg Si / m³	Continuous		RNG
Toluene	45,000 (12,000)	Periodic	Periodic	RNG
Vinyl Chloride	21 (8.3)	Periodic		RNG
Microbiological Organisms (SRB, IOB, APB, etc.)	100 colonies/ml liquid	Periodic	Periodic	RNG

1 Sampling/testing shall utilize industry standard sample/test methods appropriate for the constituent and be approved by Energy Transfer Measurement Technical Services

2 If RNG Quality Limits are listed in the Transporter's tariff, the tariff limit will apply.

TESTING PROCEDURES

➢ Pre-Injection Testing

- RNG Operator shall extract 2 samples for laboratory testing
  - First sample – extracted within 45 days prior to initial gas flow
  - Second sample – extracted after acceptable test results of first sample are received and with adequate number of days to receive test results prior to initial gas flow

- If there are any results exceeding the applicable gas quality limits
  - RNG will not be accepted into Transporter's (Florida Gas) pipeline system
  - RNG Operator will make necessary modifications and Transporter (Florida Gas) will review
  - RNG Operator may request to restart Pre-Injection Testing

- If both test results are within the applicable gas quality limits, RNG may be received into Transporter's (Florida Gas) pipeline system

TESTING PROCEDURES (cont'd)

➢ Periodic Testing Categories

- Monthly Testing – The first Monthly Test shall be completed no later than 30 calendar days after successful Pre-Injection Testing, followed by 1 lab test every calendar month, not to exceed 45 calendar days between tests
  - If all test results are within the applicable gas quality limits for 3 consecutive Monthly Tests, RNG Operator may transition to Quarterly Testing

- Quarterly Testing – The first Quarterly Test shall be completed no later than 90 calendar days after the date of the last successful Monthly Test, followed by 1 lab test in every third calendar month, not to exceed 105 calendar days between tests
  - If all test results are within the applicable gas quality limits for 3 consecutive Quarterly Tests and if Transporter and RNG Operator mutually agree to transition from Quarterly Testing to Annual Testing, RNG Operator may transition to Annual Testing

- Annual Testing – the first Annual Test shall be completed no later than 365 calendar days after the date of the last successful Quarterly Test, followed by 1 lab test per calendar year, not to exceed 13 months between tests

TESTING PROCEDURES (cont'd)

➢ Periodic Testing Details

- RNG Operator shall procure and furnish all materials, equipment, supplies, services and labor required for Periodic Testing extraction and analysis
- RNG samples shall be extracted for laboratory analysis at a sample point upstream of the RNG Receipt Point
- The sample point shall be an inline probe and shall be separate from the sample point used for Continuous Sampling
- Samples shall be collected by RNG Operator using Transporter (Florida Gas) approved industry standard testing methods
- With regards to sampling, the methods, apparatus, collection devices, expiration times and chain of custody procedures shall conform to applicable industry standards and laboratory requirements
- Samples shall be sent by the RNG Operator to the previously agreed upon approved laboratory for analysis
- RNG Operator shall be responsible for all costs associated with such testing
- In the event of unsuccessful test results during any of the Periodic Testing – Monthly, Quarterly or Annual – testing will revert back to Monthly Testing

TESTING PROCEDURES (cont'd)

➢ Continuous Sampling

- Transporter (Florida Gas) will own, operate and provide maintenance of the gas quality equipment required for custody transfer measurement
- RNG Operator will own, operate and provide maintenance for all additional required analyzers
- If results are found not to comply with Transporter's (Florida Gas) gas quality limits during successive tests, Florida Gas will notify RNG Operator to conform with the operating parameters
- Transporter (Florida Gas) retains the right to refuse to accept any deliveries of natural gas not meeting any of the gas quality limits or operating procedures

FGT TARIFF FILING

- The proposed changes are designed to enable FGT to accept RNG at RNG Receipt Points on its system while balancing the needs of RNG suppliers, the needs of shippers and end-users, the requirement to maintain the safe and efficient operation of FGT's facilities and equipment and the integrity of FGT's system, and the obligations to protect the safety of FGT's workers.

- FGT additionally proposes to establish a minimum Wobbe Index for RNG Receipts equal to 1250, subject to the ability to blend the RNG volumes such that gas delivered at downstream delivery points meet all other quality specifications.

- FGT has fully supported its tariff filing seeking to implement Gas Quality standards for RNG.

- FGT believes the FERC should move forward expeditiously to approve the proposed standards to provide support for further investment in RNG facilities by upstream developers and to provide benefits to shippers who can benefit from the use of RNG that is subject to appropriate quality standards.

FGT TARIFF FILING

Questions?