



SMITH GILLIAM WILLIAMS & MILES

April 22, 2025

Via electronic mailing

Website: sgwmfirm.com

Phone: 770.536.3381

Fax: 770.531.1481

Mailing Address: P.O. Box 1098
Gainesville, GA 30503

Hall County Board of Commissioners

David Gibbs, Commissioner Chair (dgibbs@hallcounty.org)

Commissioner Gregg Poole (gpoole@hallcounty.org)

Commissioner Kathy Cooper (kcooper@hallcounty.org)

Commissioner Jeff Stowe (jstowe@hallcounty.org)

Commissioner Billy Powell (bpowell@hallcounty.org)

**Re: Application for Rezoning of 4212 Roy Parks Road by Clean Eagle RNG, LLC;
HZON24-0036 – Renewable Natural Gas (RNG) Interconnect to Decant and
Transfer RNG to Existing Liberty Utilities Pipeline**

Chairman Gibbs and Commissioners,

An issue has been raised as to whether the Renewable Natural Gas (“RNG”) being proposed to be injected into the Liberty Utilities pipeline for distribution to customers located in Hall County has been approved by the Georgia Public Service Commission for injection into the Liberty Utilities Gas Distribution System. The answer to that question is yes. Attached here is Docket 42959, Order Adopting Tariff Revisions, issued by the Public Service Commission of the State of Georgia on August 27, 2023, effective September 1, 2023, that contains highlighted provisions which are stated below.

On July 17, 2023, Liberty Utilities (“Liberty”) petitioned the Georgia Public Service Commission (“Commission”) to request authority to add new Local Gas Transportation Service Schedule 870 and to make conforming changes to other sections of the company’s existing tariff. The proposed Schedule 870 provides terms and conditions for intrastate transportation service for gas, including RNG produced in Georgia. The petition also established gas quality standards for any locally produced gas that will be injected into the Liberty Utilities Gas Distribution System. Gas quantity will be monitored either continuously or periodically, as required by the proposed service regulation.

The Commission staff met several times with Liberty Utilities to provide pipeline quality gas from locally produced sources, protect firm customers from cost incurred by system construction, and ensure regulatory compliance. “The gas quality standards intend to conform to natural gas quality standards to an acceptable level per each identified constituent of concern...Staff confirmed that proposed Tariff 870 will provide for comparable transportation-only service, for receipt and delivery points within the state of Georgia.”

Printed Address:

Smith Gilliam Williams & Miles, P.A.
340 Jesse Jewell Parkway, Suite 300
Gainesville, GA 30501

In Your Community. In Your Corner.

As part of its due diligence related to service Regulation 10, staff met with a chemical engineer with experience and expertise in the RNG industry to discuss the process of converting raw waste gas from renewable sources such as landfills and stockyards into useable, safe, and effective natural gas from producer to consumer. After staff completed its due diligence on August 14, 2023, Findings of Fact and Conclusions of Law were issued by the Public Service Commission, which included, "Therefore, the Commission approves and adopts the proposed additions and modification as being appropriate and in the public interest."

Exhibit 1 includes 4(f) "Local Gas: Local Gas shall be either (1) Gas produced in Georgia from a landfill, livestock operation, wastewater treatment, or other Gas production site, or produced from natural underground strata containing natural gas..."

Exhibit 2 includes 10.2: "Specifications: Local gas composition must meet the specification outlined in Table 1....RNG must...Have an energy content no lower than 970 btu/scf and no higher than 1,110 btu/scf."

Typical fossil gas for natural gas has an average between 950 btu/scf and no higher than 1,200 btu/scf. The requirements established by the Commission are 970 btu/scf – 1,110btu/scf. Other specifications are also added under Section 10.2. The two major requirements are that the gas must be continuously monitored and tested and must meet the specifications in Section 10.2.

To sum up, the particular use of RNG from a landfill has been approved by the Georgia Public Service Commission for injection into the distribution system of Liberty Utilities in the state of Georgia, and the gas may be transported on the roads and highways of the state of Georgia.

I hope that this clarifies the issues concerning the quality of the RNG that Liberty is injecting into the gas distribution system.

If you have any questions, please give me a call, and I will be glad to obtain the answers to the questions which you have.

With cordial regards, I remain,
Sincerely,


Steven P. Gilliam

Cc: Zach Propes, Hall County Administrator (zpropes@hallcounty.org)
Beth Garmon, Director of Planning and Zoning (bgarmon@hallcounty.org)
Clint Cox, Liberty Utilities (clint.cox@libertyutilities.com)
Lauren Rowe, Clean Eagle RNG, LLC (lrowe@archaea.energy)
Mel Lara, Certatus (mlara@certarus.com)