



ORDER NUMBER
G-182-25

IN THE MATTER OF
the *Utilities Commission Act*, RSBC 1996, Chapter 473

and

British Columbia Utilities Commission
Review of Renewable Natural Gas Definition and Accounting

BEFORE:

M. Jaccard, Panel Chair
T. A. Loski, Commissioner
B. A. Magnan, Commissioner

on July 24, 2025

ORDER

WHEREAS:

- A. By Order G-137-25 dated June 5, 2025, the BCUC established a regulatory timetable to examine the BCUC's definition of renewable natural gas (RNG), the sufficiency of mechanisms for ensuring that greenhouse gas emissions associated with biomethane purchased from projects located outside of British Columbia are properly accounted for, and whether further acquisitions of out-of-province biomethane are consistent with the requirements of the Greenhouse Gas Reduction Regulation (GGRR) (Inquiry);
- B. The regulatory timetable included, among other things, a deadline for parties to submit a request to intervene in accordance with the BCUC's Rules of Practice and Procedure (Rules). Parties intending to apply for Participant Cost Award (PCA) funding were also required to provide a PCA cost estimate along with their request to intervene;
- C. Appendix B of Order G-137-25 set out the scope of the submissions requested by the BCUC in the Inquiry;
- D. By July 8, 2025, the following parties filed requests to intervene:
 - BC Old Age Pensioners' Organization et al. (BCOAPO);
 - BC Sustainable Energy Association (BCSEA);
 - Canadian Biogas Association (CBA);
 - CleanCounts;
 - Commercial Energy Consumers Association of BC (CEC);
 - Creative Energy;
 - First Things First Okanagan Climate Action (FTFO);

- Force of Nature Alliance (FNA);
- FortisBC Energy Inc. (FEI);
- Metro Vancouver;
- Movement of United Professionals (MoveUP);
- My Sea to Sky Society (MS2S);
- Pacific Northern Gas Ltd. (PNG);
- Residential Consumer Intervener Association (RCIA);
- The Coalition of Renewable Natural Gas Inc. (RNG Coalition); and
- Stand Environmental Society (Stand.earth); and

E. The BCUC has reviewed the requests to intervene and finds the following determinations are warranted.

NOW THEREFORE for the reasons outlined in the decision accompanying this order, the BCUC orders as follows:

1. The following parties are accepted as interveners: BCOAPO, BCSEA, CBA, CleanCounts, CEC, Creative Energy, FTFO, FNA, FEI, Metro Vancouver, MoveUP, MS2S, PNG, RCIA, RNG Coalition, and Stand.earth.
2. BCOAPO, the CEC and RCIA (Intervener Group 1) are directed to participate as one intervener group, and to file all submissions jointly.
3. BCSEA, FTFO, FNA, MS2S and Stand.earth (Intervener Group 2) are directed to participate as one intervener group, and to file all submissions jointly.
4. CBA and the RNG Coalition (Intervener Group 3) are directed to participate as one intervener group, and to file all submissions jointly.
5. The following caps on the amount of PCA available in this proceeding are established:
 - a. The maximum PCA amount collectively available to Intervener Group 1 is \$45,000;
 - b. The maximum PCA amount collectively available to Intervener Group 2 is \$75,000; and
 - c. The maximum PCA amount collectively available to Intervener Group 3 is \$15,000.

DATED at the City of Vancouver, in the Province of British Columbia, this 24th day of July 2025.

BY ORDER

Electronically signed by Mark Jaccard

M. Jaccard
Commissioner

British Columbia Utilities Commission
Review of Renewable Natural Gas Definition and Accounting

DECISION

1.0 Introduction

By Order G-137-25 dated June 5, 2025, the BCUC established an inquiry (Inquiry) and a regulatory timetable to examine the BCUC's definition of renewable natural gas (RNG), the sufficiency of mechanisms for ensuring that greenhouse gas emissions associated with biomethane purchased from projects located outside of British Columbia are properly accounted for, and whether further acquisitions of out-of-province biomethane are consistent with the requirements of the Greenhouse Gas Reduction Regulation (GGRR). Directive 4 and Appendix B to Order G-137-25 set out the scope of submissions requested by the BCUC in the Inquiry.

The regulatory timetable established for the Inquiry included a deadline for parties who wish to actively participate to submit a request to intervene in accordance with the BCUC Rules of Practice and Procedure (Rules).¹ Parties requesting intervener status were instructed to include a participant cost award (PCA) cost estimate, if any, along with their request to intervene.

By July 8, 2025, the following sixteen parties (Requesting Parties) filed requests to intervene:

- BC Old Age Pensioners' Organization et al. (BCOAPO),
- BC Sustainable Energy Association (BCSEA),
- Canadian Biogas Association (CBA),
- CleanCounts,
- Commercial Energy Consumers Association of BC (CEC),
- Creative Energy,
- First Things First Okanagan Climate Action (FTFO),
- Force of Nature Alliance (FNA),
- FortisBC Energy Inc. (FEI),
- Metro Vancouver,
- Movement of United Professionals (MoveUP),
- My Sea to Sky Society (MS2S),
- Pacific Northern Gas Ltd. (PNG),
- Residential Consumer Intervener Association (RCIA),
- The Coalition of Renewable Natural Gas Inc. (RNG Coalition), and
- Stand Environmental Society (Stand.earth).

Rules 9.07 and 9.08 state that the BCUC may grant intervener status subject to conditions it considers appropriate and may determine the scope of an intervener's participation considering, for example, the person's interests, and the nature, importance and breadth of issues the person plans to address.

Rules 10.02 and 10.03 state that interveners are expected to take reasonable efforts to avoid the duplication of evidence and that the BCUC may require an intervener to coordinate with other interveners who represent substantially similar interests.

Rule 32.02 states that the BCUC may establish a cap on all, or on part of, a cost award available in a proceeding to any or all participants.

¹ [Order G-296-24 BCUC Rules of Practice and Procedure](#)

2.0 Intervener Acceptance, Collaboration and PCA Funding Cap

The Panel accepts the Requesting Parties as interveners in this proceeding, subject to the requirements regarding participation outlined below.

The Panel notes that there are commonalities between the issues that certain interveners indicated they intend to address in the Inquiry. To avoid duplication of effort and the associated increase in costs and regulatory burden, the Panel determines that requiring certain interveners to collaborate is warranted, as described further below.

In their requests to intervene, BCOAPO and the CEC submit that they represent the interests of residential and commercial natural gas ratepayers, respectively. Similarly, RCIA states that it intends to participate on behalf of the interests of residential energy customers. Each of these parties highlights the potential cost impacts to customers of RNG acquisitions. Given these shared interests, the Panel considers it appropriate for these three interveners to work together as a single group.

The requests to intervene submitted by BCSEA, FTFO, FNA, MS2S, and Stand.Earth also indicate material shared interests. Each intervener identifies a focus on climate action and the achievement of greenhouse gas reductions in British Columbia (BC). BCSEA states its members want the energy they purchase and use to be sustainably produced and transported. FTFO states it wants to ensure that steps to reduce emissions actually do so. FNA states its supporters are concerned about energy affordability and climate impacts of RNG on their lives and community. MS2S states its collective interest is in achieving the goals in the "CleanBC- Roadmap to 2050". Stand.earth states concern that the current definition of RNG is not leading to a substantial and measurable reduction in GHG emissions in BC. Accordingly, the Panel considers it appropriate for these interveners to work together as a single group.

Finally, the requests to intervene submitted by CBA and the RNG Coalition show that these interveners each intend to focus on continued development of the RNG industry. CBA describes itself as the voice of the Canadian biogas and RNG sector with the goal of building a strong, robust biogas and RNG industry in Canada. The RNG Coalition states that it advocates for the sustainable development, deployment, and utilization of RNG in Canada and the United States and that its objective is to ensure the continuation of the existing regulatory regime. As such, the Panel considers it appropriate for these parties to work together as a single group.

Therefore, further to the above reasons and pursuant to Rule 10.03:

- **BCOAPO, the CEC and RCIA (Intervener Group 1) are directed to participate as one intervener group, and to file all submissions jointly.**
- **BCSEA, FTFO, FNA, MS2S and Stand.earth (Intervener Group 2) are directed to participate as one intervener group, and to file all submissions jointly.**
- **CBA and the RNG Coalition (Intervener Group 3) are directed to participate as one intervener group, and to file all submissions jointly.**

Among the sixteen interveners, eight have indicated an intention to request PCA. The PCA funding estimates provided by interveners amounted to approximately \$200,000 in total. In the cover letter accompanying Order G-137-25, the BCUC stated that PCA funding would be limited for this proceeding.² Having considered the narrow scope of the Inquiry, the interests represented by the various intervener groups, ratepayer impact, and the PCA cost estimates provided, the Panel considers establishing PCA funding caps, allocated as set out below, to be warranted.

² Exhibit A-2, p. 3.

Pursuant to Rule 32.02, the Panel directs that PCA is capped in this proceeding as follows:

- The maximum PCA amount collectively available to Intervener Group 1 is \$45,000;
- The maximum PCA amount collectively available to Intervener Group 2 is \$75,000; and
- The maximum PCA amount collectively available to Intervener Group 3 is \$15,000.

The Panel considers that it is appropriate to establish a separate PCA cap for each of the intervenor groups, since the members of each group have shared interests and intend to focus on similar issues. These separate PCA caps will reasonably support each of these perspectives while balancing the total PCA amounts, which ultimately will be borne by ratepayers. Further, the Panel considers that establishing a PCA cap for each group roughly proportional to the number of intervenors in the group that intend to claim PCA is a fair way to ensure a reasonable amount of funding is potentially available for each participant, subject to the Panel's ultimate determination on PCA at the conclusion of this Inquiry.

The Panel notes that there may be a question of whether PCA amounts should have been allocated to CBA given the business interests it represents. However, the Panel believes that the CBA, and Intervener Group 3 as a whole, may offer a different perspective from other participants in the Inquiry and information which would be a helpful contribution to the Panel. As such, the Panel finds it is appropriate to include this intervenor group in the PCA cap allocations.

3.0 Scope of the Inquiry

The Panel notes that several intervenors expressed an intention to file submissions on topics outside of the questions posed in Appendix B to Order G-137-25. For example, MS2S states that it intends to address "the differences in fungibility between methane (aka natural gas) and electricity" as a key issue in this proceeding, and Metro Vancouver states that it may address issues of housing and economic development as part of its participation. These are examples of issues the Panel considers to be outside of the scope of the Inquiry. The Panel reminds all intervenors of directive 4 of Order G-137-25, which limits the scope of intervenor submissions to the questions set out in Appendix B of that order.

DATED at the City of Vancouver, in the Province of British Columbia, this 24th day of July 2025.

Electronically signed by Mark Jaccard

M. Jaccard
Panel Chair/Commissioner

Electronically signed by Tom Loski

T. A. Loski
Commissioner

Electronically signed by Bernard Magnan

B. A. Magnan
Commissioner