

**In the Matter of CenterPoint Energy's Natural Gas Innovation Plan**

**PUC Docket No. G-008/M-23-215**

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to offer supplemental reply comments on the natural gas innovation plan submitted by CenterPoint Energy ("CenterPoint").

We agree with the comments filed by the Coalition for Renewable Natural Gas ("CRNG") on the potential for development of renewable natural gas ("RNG") resources in Minnesota, which the organization estimates at 23-42 tBtu per year. We understand the need for enough flexibility in procurement to support the growth of functional RNG markets, however believe it would be appropriate for CenterPoint to prioritize purchase of RNG from sources in or immediately adjacent to Minnesota in order to maximize local economic and market development impacts.

We agree with CenterPoint, CRNG and the Clean Energy Organizations ("CEO") on the value of pursuing wastewater treatment and landfill gas resources along with resources derived from animal manure and food waste. As with many of the other innovative resources under consideration, we are in the early stages of RNG market development, and both flexibility and patience will be required to accomplish the objectives of the Natural Gas Innovation Act ("NGIA"). If we want the market to respond, we need to make clear that we are committed to supporting diverse resources and will not move too quickly to pull back potential resources.

We do not agree with the CEO recommendation that electrification pilots not be limited to hybrid heating systems. While CenterPoint customers are welcome to "cut the pipe" through full electrification, the decision to do so has the potential to negatively impact remaining customers who share infrastructure costs. We think it is unreasonable to ask customers to help pay for programs that increase their costs both directly through the NGIA program and indirectly through shared capital costs for participants who will cease to be CenterPoint ratepayers as a result.

We also suggest that the CEO recommendations concerning CenterPoint's decarbonization goals raise questions better addressed in a Future of Gas or Integrated Resource Plan proceeding. As we observed in the Gas IRP proceeding, we take a different view of the applicability of the state's decarbonization goals to CenterPoint's operations, but we don't see the NGIA docket as the appropriate venue to address those differences.

Finally, we consider to support budget flexibility and urge the Commission to give CenterPoint the latitude needed to get as many of the proposed innovations as possible deployed on some scale. We anticipate that some will be more popular and more successful than others, and that some will take time to gain market acceptance, but this is precisely the point of authorizing investment in innovation pilots and we urge commitment and patience as the programs develop.

Thank you for your consideration.

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Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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