

Ex Parte Communication Report

Date:

To: Public Ex Parte Communication File

Docket No:

Case Name:

From: PUC Staff:

RE: Permissible Ex Parte Communications Pursuant to Minn. Rules, Part 7845.7400.

1. Type of communication: (Oral or Written)

If written, attach the document.

If oral, Date:

Time:

NOTE: In both instances, please notify the Maker the communication has been submitted for inclusion in the record.

2. Maker of the Communication:

3. Recipient of the Communication:

4. For communications involving the setting of interim rates or the review of compliance filings, the topic was:

5. For all other permissible communications that are prohibited for the Commissioners under Minn. Rules, part 7845.7200, the substance of the communication was:

6. For oral permissible ex parte communications, has a copy of this memo been sent to the assigned Administrative Law Judge? Yes No N/A

From: [Lang, Betsy L](#)
To: [Nikitas, Sophie \(She/Her/Hers\) \(PUC\)](#); [Harsch, Trey \(PUC\)](#)
Cc: [Suppes, Emily M](#)
Subject: RE: [External Email] Ex Parte: Docket 23-215
Date: Wednesday, June 12, 2024 3:28:31 PM
Attachments: [image001.png](#)
[image002.png](#)

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Hello Sophie and Trey,

Thanks for your request for further information.

CenterPoint Energy engaged in telephone conversations with the developer involved in Pilot B, Dem-Con HZI, to generally discuss updates and parties' comments received that were relevant to the project. Regarding the CEOs' recommendation, CenterPoint asked whether the option to work with an industrial offtaker had been considered by the developer. The developer reiterated their interest in interconnecting to a common carrier pipeline and indicated that other offtake options had been considered, but were not practical for their project. Their concerns aligned with those CenterPoint Energy has heard expressed by other developers with respect to exclusive interconnections to industrial customers. CenterPoint Energy described these general concerns in its Reply Comments at page 51 on Pilot C, RNG Request for Proposals. The concerns include technical limitations associated with 24/7 production and offtake by a single customer, as well as market accessibility considerations that impact the project's risk. The developer indicated that diversity in contracting was important to them – that they desired RNG sales to multiple markets and offtakers that would not be possible with a dedicated industrial customer. This intended contract diversity was reflected in CenterPoint's modification to Pilot B allocation in Reply Comments as a reduced portion of the project's RNG purchased by the utility.

Please let me know if you have further questions.

Thank you,



Betsy Lang
Lead Regulatory Analyst – Natural Gas Innovation

CenterPoint Energy | Regulatory Affairs

612.321.4318 w | 612.860.5934 c

CenterPointEnergy.com

From: Nikitas, Sophie (She/Her/Hers) (PUC) <sophie.nikitas@state.mn.us>

Sent: Tuesday, June 11, 2024 10:34 AM

To: Lang, Betsy L <betsy.lang@centerpointenergy.com>; Suppes, Emily M <emily.suppes@centerpointenergy.com>

Cc: Harsch, Trey (PUC) <trey.harsch@state.mn.us>

Subject: [External Email] Ex Parte: Docket 23-215

EXTERNAL EMAIL

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Hello all,

I am writing to ask for additional information on your Reply Comments. Please note that Staff intends to file this discussion in the docket as an ex parte communication, as it may contain new information not yet available in the record.

On page 40 of Reply Comments, CenterPoint replied to the CEOs' recommendation that it use Pilot B RNG for industrial customers by saying, in part, that it had already consulted with Dem-Con HZI on providing the RNG to industrial off-takers and that Dem-Con had determined that it was not "feasible or desirable." Is there any more information that CenterPoint can share about the developer's response?

Best,
Sophie

Sophie Nikitas

Rates Analyst | Economic Analysis Unit

Pronouns: She/Her

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