MINNESOTA
PUBLIC UTILITIES COMMISSION

Staff Briefing Papers

Meeting Date	December 19, 2024	**Agenda Item 2****
Company	Greater Minnesota Gas, Inc.	
Docket No.	G-022/M-24-236 **In the Matter of a Miscellaneous Tariff Change – Addition of Rate Class to Establish Renewable Natural Gas Interconnection Service**	
Issues	Should the Commission approve, modify, or reject Greater Minnesota Gas' petition to establish a Renewable Natural Gas interconnection service rate class, and to recover the cost of purchasing natural gas under this rate class through the Purchased Gas Adjustment?	
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✓**Relevant Documents**

Relevant Documents	Date
Petition, Greater Minnesota Gas	July 1, 2024
Initial Comments, Department of Commerce – Division of Energy Resources	October 9, 2024
Reply Comments, Greater Minnesota Gas	November 8, 2024
Supplemental Comments, Department of Commerce – Division of Energy Resources	November 20, 2024
Ex Parte Communication, PUC	December 2, 2024
Letter, Greater Minnesota Gas	December 9, 2024

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ACRONYMS

CIAC	Contribution in Aid of Construction
Dth	Dekatherm
GHG	Greenhouse Gas
IRA	Inflation Reduction Act
NGIA	Natural Gas Innovation Act
O&M	Operation and Maintenance
PGA	Purchased Gas Adjustment Mechanism
RNG	Renewable Natural Gas

BACKGROUND

Renewable natural gas (RNG) is defined in Minn. Stat. § 216B.2427 under the Natural Gas Innovation Act as biogas that has been processed to be interchangeable with, and that has a lower lifecycle greenhouse gas (GHG) intensity than, natural gas produced from conventional geologic sources. According to the Environmental Protection Agency (EPA), RNG can be produced from a variety of sources, including solid waste landfills, livestock farms, and organic waste.[1]

On July 1, 2024, Greater Minnesota Gas Inc. (GMG or the Company) filed a petition to establish a new rate class for RNG producers who wish to interconnect to GMG's gas distribution system. GMG also proposed to recover costs for the natural gas commodity purchased under this rate class through the Purchased Gas Adjustment (PGA) mechanism. Throughout its petition, GMG addressed specific areas of discussion from other recent RNG interconnection tariff petitions, including cost recovery, reporting requirements, and Inflation Reduction Act benefits.

GMG is one of several Minnesota gas utilities currently seeking to interconnect RNG with their distribution systems, and RNG-related issues have been discussed in an increasing number of dockets over the last six years.[2] To date, none of the companies with approved tariffs have reported any executed RNG interconnection agreements.

PETITION SUMMARY

Greater Minnesota Gas filed a proposal to establish a RNG interconnection tariff, with related Interconnection and Natural Gas Supply Agreements, and to recover the costs of purchasing the unbundled RNG commodity through the PGA mechanism. GMG stated that the environmental benefits of RNG, as well as economic opportunities for rural livestock operations and interest from potential producers were key factors in its decision to establish the service.

The components for Commission approval include:

- Tariff establishing a new rate class.
- Interconnection and Natural Gas Purchase Agreements.
- Cost recovery of the commodity purchase through the PGA.
- Reporting requirements.

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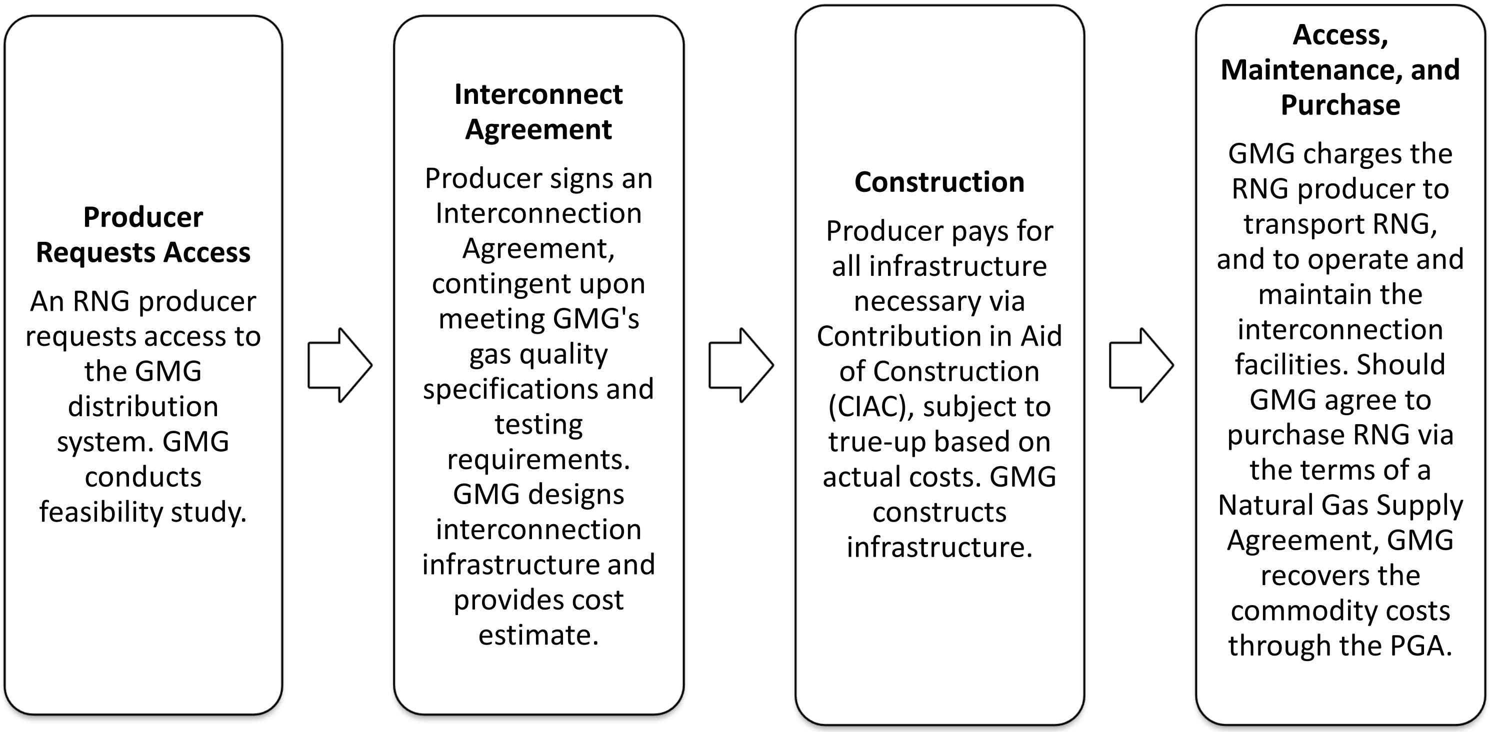
[1] https://www.epa.gov/lmop/renewable-natural-gas Accessed December 15, 2023.

[2] See Appendix A for the list of relevant dockets.

Here's how the proposed RNG interconnection and purchase would work:

Figure 1. GMG's Proposed Interconnect Process



I. Tariff

This is GMG's first attempt to create a rate class for interconnecting RNG to its distribution system, and therefore created a new tariff sheet and process.[3]

II. Interconnection

GMG's proposed Interconnection Agreement[4] describes the process, terms, and conditions by which an RNG producer may interconnect to the Company's gas distribution system. It is signed after the feasibility study and cost estimate is completed, and before construction begins. The Agreement includes:

- The estimated costs for design, installation, construction, and inspection of interconnection facilities required to be paid through up-front contributions in aid of construction (CIAC). The CIAC payment is subject to true-up should costs exceed the estimate.
- The gas quality standards that an RNG producer must meet before injecting their commodity into the utility's distribution system.
- Levelized maintenance fees that are determined at signing.

[3] See GMG's December 9th Letter for the most up-to-date tariff.

[4] See GMG's December 9th Letter for the most up-to-date Interconnection Agreement.

- Term of contract and termination procedures.

The proposed gas quality standards are specific to RNG derived from dairy and other animal waste, as GMG does not expect inquiries from producers using other biomass (e.g. landfills). However, GMG did add a provision in its Interconnection Tariff that states that this service is not available to producers of RNG derived from a hazardous waste landfill.[5]

III. Natural Gas Purchase Agreement

GMG submitted a Natural Gas Purchase Agreement for approval.[6] GMG proposed to purchase the RNG commodity under this tariff unbundled from the environmental attributes, at a price no greater than 95% of the average of Ventura and Demarc index prices, or $8 per dekatherm, whichever is less.[7] GMG pointed to the NGIA Statute (Minn. Stat. § 216B.2427, subd. 4) to justify its purchase price:

(a) Without filing an innovation plan, a natural gas utility may propose and the commission may approve cost recovery for:

> *(2) utility expenditures for innovative resources procured at a cost that is within five percent of the average of Ventura and Demarc index prices for natural gas produced from conventional geologic sources at the time of the transaction per unit of natural gas that the innovative resource displaces.*

GMG said this price would allow it to purchase unbundled RNG without submitting a Natural Gas Innovation Act plan.

However, GMG emphasized in discussion with the Department that not all producers who sign Interconnection Agreements will, de facto, be able to sell gas to the Company. Rather, the Company clarified that the Natural Gas Supply Agreement is the agreement that will be used to negotiate the sale.[8]

IV. Reporting Requirements

GMG proposed to require RNG producers to submit some information prior to interconnection, which the Company would then report to the Commission upon each new interconnection, as well as on an annual basis. This list is based on some of CenterPoint's, Minnesota Energy

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[5] GMG Reply Comments, p. 5

[6] See GMG's December 9th Letter for the most up-to-date Natural Gas Purchase Agreement.

[7] GMG Petition, Attachment B, page 3: "The purchase price for the NG purchased by GMG from Producer pursuant to this Agreement shall be the 95% of the average of Ventura and Demarc daily index price for natural gas produced from conventional geologic sources as published by Inside FERC (or such other successor publication or source as mutually agreed to Page 4 of 10 by the Parties) or $8.00 per dekatherm, whichever is less."

[8] GMG Reply Comments, p. 2

Resources Corp.'s (MERC's), and Great Plains' ordered reporting requirements.[9]

GMG agreed to report the following within 30 days of accepting a new producer's natural gas into its system, if the information is known by the producer and provided to GMG:

A. The producer's feedstock or feedstocks.
B. The total amount of RNG expected to be provided by the producer.
C. The mix of end-uses of the digestate.
D. If known, the state(s) in which the entity or entities purchasing the RNG from the producer are located and the end-use for which the RNG is being purchased.

On an annual basis, GMG agreed to report the following:

A. The total number of interconnected RNG producers supplying RNG to the Company's system in the previous calendar year.
B. The amount of RNG volumes taken onto the Company's system each year in total and from each of those producers.
C. The mix of feedstock used by RNG producers connected to the Company's system and volumes provided to the system broken out by primary feedstock for the previous calendar year.
D. The mix of end-uses of the digestate for each producer interconnected to the Company's system.
E. Updated information for each interconnected RNG producer using the same data points as included in the per-producer compliance filing described above.

GMG was resistant to reporting several data points (which the Commission has required of some other gas utilities) about estimated methane emissions, lifecycle GHG emissions, a GHG accounting framework, and price comparisons. GMG argued that, by purchasing the gas commodity without the environmental attributes, and by extension claiming no environmental benefit (such as through an NGIA plan), it had no obligation to report on the carbon intensity of its purchase. GMG acknowledged that the Commission's docket G999/CI-24-202, which intends to standardize reporting requirements for gas utilities interconnecting RNG, would influence its long-term reporting requirements no matter the Commission's decision in the instant petition.

V. <u>Other Topics</u>

Like other gas utilities proposing to interconnect RNG projects, GMG stated that it did not believe itself to be eligible for any IRA tax credits, which are reserved for producers.[10] It agreed that it would continue to monitor for opportunities.[11]

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[9] See Appendix A for relevant dockets.

[10] GMG Petition, Page 6

[11] GMG Reply Comments, p. 9

DISCUSSION

The Department of Commerce (DOC or the Department) was the only party to file comments on this matter. The Department overall recommended approving the petition with modifications.

The Department and the Company agreed on several modifications to the tariff sheet, interconnection agreement, and natural gas supply agreement. Below, Staff focuses on places where the parties disagreed or had substantial discussion.

I. Tariff

The Department recommended, and the Company agreed to amend the tariff sheet to clarify that the responsibility to construct, install, own, operate, and maintain all equipment necessary for interconnection is consistent with the RNG Interconnection Agreement.[12]

II. Interconnection Agreement

Costs & Responsibilities

The Department and GMG disagreed about whether interconnection costs were clear and fair to prospective producers. While GMG maintained that its Interconnection Agreement clearly laid out the responsibilities of producers while also providing flexibility for costs,[13] the Department felt that the Company would need to prove that its transportation or supply charges were reasonable in order to recover them in the next rate case.

The Department ultimately recommended that GMG collect and deliver data on its tariff and Interconnection Agreements – including data used in a Class Cost of Service Study – at the time of its next rate case in order to provide the opportunity for the Commission to review the reasonableness of costs.[14] (**Decision Option 3**) GMG agreed to maintain data related to contribution in aid of construction, regulatory costs and maintenance fees, but felt that more granular data was unduly burdensome.[15] **(Decision Option 4)**

The Department also expressed concern that long-term levelized maintenance fees would leave ratepayers on the hook should the utility's costs during the interconnection process exceed the agreed-upon levelized cost estimates. GMG, on the other hand, argued that a levelized maintenance cost approach provided stability and predictability for both the utility and the RNG producer.

The Department recognized the value of stability, but recommended that the Interconnection

[12] Attached in clean and red-line in GMG's Letter (December 9, 2024)

[13] GMG Reply Comments, p. 3

[14] PUC Ex Parte (December 2, 2024)

[15] GMG Letter (December 9, 2024), p. 7

Agreement be updated to include a provision for maintenance costs to be reevaluated not less than every two years, in order to ensure that cost recovery matches actual expenses. (**Decision Option 5)** The Department said that the Company could decide how to conduct the reevaluation.[16]

GMG strongly opposed this recommendation, saying that it would undermine price certainty for producers as they consider whether and how to finance the infrastructure.

Gas Quality Standards
The Department recommended that the Commission order GMG to adhere to the same order points as other gas utilities regarding gas quality standards.[17] (**Decision Option 6.A-D**)

GMG challenged the relevance of some of those order points, stating that pipeline quality standards were set by FERC and imposed by the relevant interstate pipeline, not by MNOPS or the Company.[18] The Department maintained its recommendation, citing consistency with other orders for CenterPoint, MERC, and Great Plains.[19] GMG ultimately agreed to **Decision Option 6.A-C** but did not support **Decision Option 6.D**. As an alternative, GMG proposed **Decision Option 6.E**, which the Company said will avoid "piecemeal changes made in Minnesota that may not be consistent with interstate pipeline standards**.**[20]

III. Natural Gas Purchase Agreement

The Department and the Company debated the Company's proposal to purchase the gas commodity from a producer at the cheaper of $8 or 95% of the average of Demarc and Ventura index prices. The Department argued that the purchase structure was inherently flawed. While the Department agreed that GMG's purchase of each Dth of gas at 95% of the average of Demarc and Ventura index prices was permissible per the NGIA statute, it argued that "any price that falls outside the window of the 95% to 105% statutory requirement is in violation of the statute,"[21] meaning that any price below 95% of the average would be prohibited in the Department's view. The Department then provided example calculations to show that, at certain price points, $8/Dth would fall below the 95% - 105% range, and recommended eliminating that cap. **(Decision Option 7)**

The Company strongly disagreed with the Department's assertion that the price must be bound within 95% - 105% of the average of Ventura and Demarc. The Company replied that it was

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[16] DOC PUC Ex Parte (December 2, 2024)

[17] See Appendix A for list of gas utilities with approved RNG Interconnection Tariffs

[18] GMG Reply Comments, p. 4

[19] DOC Supplemental Comments, pp. 12-13

[20] GMG Letter, pp. 4-5

[21] Emphasis added; DOC PUC Ex Parte Communication (December 2, 2024)

inarguably a good deal for ratepayers to cap purchases in such a manner, and that the "within five percent" phrase was intended to set an upper limit to protect ratepayers against price anomalies such as Winter Storm Uri, not a lower limit. The Company argued that it was "nonsensical to infer that any costs that are lower than 105% of the approved cost recovery benchmark would be prohibited or not recoverable, including those below 95% of the benchmark."[22] The Company stated that, should the Commission choose **Decision Option 7,** it would withdraw its petition to purchase RNG under this tariff and only offer interconnection and transportation services.[23]

Regardless of the Commission's decision on price caps, the Department found that recovering the cost of gas purchased under this tariff via the Company's PGA mechanism would be reasonable, and Staff notes that this is consistent with the Commission order for MERC's petition.[24] The Department also recommended – and GMG agreed - that if either the Ventura or Demarc markets do not have a reported available price, the price shall be the one that is reported. **(Decision Option 8)**

IV. Reporting Requirements

Reporting requirements have been one of the biggest sources of discussion in Commission proceedings for RNG interconnection petitions. The Department admitted that both it and the Commission have been somewhat inconsistent about what gas utilities must report depending on whether they are interconnecting, and/or transporting, and/or purchasing RNG. The Department acknowledged that the Commission's docket No. G999/CI-24-202 leaves room for these reporting requirements to be debated and potentially reformed in a holistic way across gas utilities.[25]

In the meantime, the Department and GMG agreed on **Decision Options 9-10.** The Department stated that, while this is a more limited list than some other petitions, it believed that this was reasonable considering GMG's relatively small size compared to previous applicants like MERC and CenterPoint.

V. Other Topics

The Department recommended, and GMG agreed to **Decision Options 11-12**, which reflect order points from other RNG interconnection tariffs about informing the Commission about affiliated transactions and conducting separate accounting.

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[22] GMG Reply Comments, pp. 5-6

[23] GMG Letter, p. 6

[24] G011/M-23-489, Order Point 4 (May 1, 2024)

[25] The Reply Comment Period closes March 24, 2025 at 4:30pm. (Notice of Comment, September 20, 2024)

STAFF ANALYSIS

I. <u>Interconnection Agreement</u>

Data
Staff believes that **Decision Option 3** may be duplicative of what GMG would ordinarily submit during a rate case. However, it appears that GMG did not submit a CCOSS in its most recent rate case that included this tariff, and therefore explicitly including these order points may help the Department and other parties evaluate the current rate case, as well as future filings. However, should the Commission agree that it wants to explicitly order GMG to maintain some of this data for future rate cases, without metrics that GMG states would be unduly burdensome, it would choose the shorter list in **Decision Option 4.**

Gas Quality Standards
GMG appears to be the first utility submitting an RNG interconnection proposal in the last year that questions the Department-recommended gas quality standards. If the Commission agreed with the Department's recommendation and believes that it is useful to have consistency across utilities, the Commission would choose **Decision Option 6.A-D.** If the Commission agreed with GMG, it would choose **Decision Option 6.A-C and 6.E**. Either way, this decision could guide the discussion in Docket No. G999/M-24-202 regarding RNG interconnection reporting standards, where gas utilities will have the opportunity to debate which of these order points should apply to them.

II. <u>Natural Gas Purchase Agreement</u>

The Commission's decision on GMG's proposed commodity pricing (including whether to order the Department's **Decision Option 7**) depends on its legal interpretation of the statute.

Minn. Stat. 216B.2427 subd.4(a) and subpart (2) states:

(a) Without filing an innovation plan, a natural gas utility may propose and the commission may approve cost recovery for:

> *(2) utility expenditures for innovative resources procured at a cost that is <u>within</u> five percent of the average of Ventura and Demarc index prices for natural gas produced from conventional geologic sources at the time of the transaction per unit of natural gas that the innovative resource displaces. <u>(Emphasis added)</u>*

The Department appears to interpret "within" to mean that purchases must be made <u>between</u> 95% - 105% of the average of Ventura and Demarc index prices. If the Commission agreed with the Department, it would choose **Decision Option 7.**

However, it is possible to interpret "within" as a cap on costs, so that purchases must be made <u>not beyond</u> the quantity of 105% of the average but could be made <u>below</u> 95% of the average. Should the Commission agree with GMG, it would find GMG's proposal statutorily permissible, and not choose **Decision Option 7**.

III. Reporting

The question on whether to require utilities petitioning for RNG interconnection to report on methane mitigation and GHG emissions analyses has been a hotly debated part of recent petitions. Staff acknowledges that the Commission will address this topic more holistically in Docket G999/M-24-202 (Initial Comment Period closes in January 2025) and that the resulting order may alter whatever the Commission requires GMG to do in this proceeding. However, the issue in the instant petition remains for the Commission to decide.

Staff notes that the Department agreed that GMG should report a more limited list of metrics than the Commission ordered CenterPoint (who proposed to interconnect and transport, but not purchase RNG) or MERC (who proposed to interconnect and purchase RNG) to report. The metrics that DOC and GMG agreed need not be reported include those about methane leakage and mitigation, GHG emissions analysis, and pricing comparison to other indexes. The Commission did not require Great Plains, Inc. (who proposed to interconnect and transport, but not purchase RNG) to report these metrics either.

Staff believes that consistency across utilities for similar services can be valuable for the Commission to compare results. However, the Department acknowledged that Great Plains and GMG are both small in comparison to MERC and CenterPoint, and Staff agrees that flexibility in recognition of limited resources is also reasonable. If the Commission agrees with both parties, it would choose **Decision Option 10** as written.

IV. Other Topics

Staff offers **Decision Option 13** so that, should the Commission make any decisions in this docket that would require the Company to amend the tariff, Interconnection Agreement, or Natural Gas Purchase Agreements as filed in its December 9th letter, the Company must file an updated version (red-lined and clean) of the tariff, Interconnection Agreement, or Natural Gas Purchase Agreement. This decision option would then delegate authority to the Executive Secretary to approve the compliance filing if parties raise no objections after 20 days.

DECISION OPTIONS

Approval of the Petition

1. Approve the petition as originally filed.

-OR-

2. Approve the petition with the modifications identified below. [DOC, GMG]

Modifications

If the Commission selects Decision Option 2, it should select at least one of the following modifications. Modifications are broken out by petition section. If the Commission chooses to modify any section, it must select at least one of the following modifications for that section.

Interconnection Agreement

If the Commission wishes to modify the Interconnection Agreement, it may choose between 3 or 4. It may also choose 5 and/or 6.

3. Require the Company to maintain and retain all data related to its "negotiated" RNG tariff and RNG Interconnection Agreement and in particular data for Articles 2.16, 2.16.1, 2.16.2, and 2.16.3 of its RNG interconnection agreement, and data that would be used in the Class Cost of Service Study; for each customer and interconnection agreement that is signed, AND until such time as the Company's next general rate case filing. [DOC,[26] GMG Opposed[27]]

-OR-

4. Require the Company to maintain and retain all data related to Articles 2.16.1 and 2.16.3, and the monthly maintenance fee paid by each producer. [GMG[28]]

5. Require the Company to update Article 2.16.2 of the RNG Interconnection Agreement to include a provision that maintenance costs will be reevaluated not less than every two years. [DOC,[29] GMG Opposed[30]]

If the Commission wishes to choose Decision Option 6, it may select 6.A-C, and then choose between 6.D and 6.E.

6. Regarding its gas quality standards, require GMG to:
   A. Ensure that any biogas interconnection or service is consistent with its obligations to

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[26] DOC Supplemental Comments, pp. 7-10; DOC PUC Ex Parte Communication

[27] GMG Letter p. 7

[28] GMG Letter, p. 7

[29] DOC Supplemental Comments, p. 30

[30] GMG Letter, pp. 4-5, 7

provide safe and reliable service.

B. Maintain on GMG's website the most up-to-date biogas quality standards and testing requirements for those injecting biogas into the distribution system under GMG's RNG interconnection program.

C. Notify the Commission when it changes its service quality standards.

[DOC,[31] GMG[32]]

-AND-

D. Periodically update its gas quality standards according to the best available science, after consulting with stakeholders, the Minnesota Department of Commerce, and the Minnesota Office of Pipeline Safety. [DOC;[33] GMG Opposed[34]]

-OR-

E. Engage with stakeholders, the Minnesota Department of Commerce, and the Minnesota Office of Pipeline Safety to listen to and consider input on GMG's gas quality standards. [GMG[35]]

Natural Gas Purchase Agreement

7. Remove the $8/Dth price cap from the Natural Gas Purchase Agreement. [DOC;[36] GMG Opposed[37]]

8. If either the Ventura or Demarc markets do not have a reported available price, the price shall be the one that is reported. [DOC,[38] GMG[39]]

Reporting

9. Order GMG to make a compliance filing within 30 days with the following items each time it accepts another producer's renewable natural gas into its system:

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[31] DOC Supplemental Comments, pp. 29-30

[32] GMG Letter, p. 7

[33] DOC Supplemental Comments, pp. 29-30

[34] GMG Letter, p. 7

[35] GMG Letter, p. 7

[36] PUC Ex Parte Communication

[37] GMG Letter, 5-8

[38] DOC Supplemental Comments, p. 30

[39] GMG Letter, p. 8

A. The producer's feedstock or feedstocks.
B. The total amount of RNG expected to be provided by the producer.
C. The mix of end-uses of the digestate.
D. If known, the state(s) in which the entity or entities purchasing the RNG from the producer are located and the end-use for which the RNG is being purchased.

[DOC,[40] GMG[41]]

10. Order GMG to make an annual compliance filing on February 1 each year, with the following information:
    A. The total number of interconnected RNG producers supplying RNG to the Company's system in the previous calendar year.
    B. The amount of RNG volumes taken onto the Company's system each year in total and from each of those producers.
    C. The mix of feedstock used by RNG producers connected to the Company's system and volumes provided to the system broken out by primary feedstock for the previous calendar year.
    D. The mix of end-uses of the digestate for each producer interconnected to the Company's system.
    E. Updated information for each interconnected RNG producer using the same data points as included in the per-producer compliance filing described above.

[DOC,[42] GMG[43]]

Other Topics

11. If any affiliates of GMG become involved in any RNG interconnection project, order the Company to make a filing in this docket that:
    A. Informs the Commission and the Department.
    B. Explains whether any proposed interconnection project implicates Minn. Stat. § 216B.48 and Minn. R. 7825.1900–7825.2300; the relevance of the affiliated interest laws to all applicable projects; and how any transactions with its affiliates would comply; and
    C. Requests Commission approval of transactions governed by the affiliated interest laws.

    [DOC,[44] GMG[45]]

12. Require the Company to:
    A. Separately track all costs using the Federal Energy Regulatory Commission (FERC)

[40] DOC Supplemental Comments, p. 30

[41] GMG Reply Comments, p. 8

[42] DOC Supplemental Comments, p. 30

[43] GMG Reply Comments, p. 8

[44] DOC Supplemental Comments, p. 31

[45] GMG Reply Comments, p. 8

accounts, sub accounts and/or FERC account equivalents, and GMG charted accounts and/or sub-accounts from GMG's internal accounting system associated with an RNG interconnection and

B. Track the total RNG received by each RNG supplier.

[DOC,[46] GMG[47]]

13. If the decisions in this docket require modification to the updated Tariff, Interconnection Agreement or the Natural Gas Supply Agreement filed in GMG's December 9th letter, require GMG to file both red-lined and clean updated Tariff, Interconnection Agreement, and Natural Gas Supply Agreement within 30 days of the order. Delegate authority to the Executive Secretary to approve the compliance filing if no objections are filed within 20 days of GMG's filing.
[Staff]

Denial of Petition

14. Deny the petition.

[46] DOC Supplemental Comments, p. 31

[47] GMG Reply Comments, p. 9

APPENDIX A

1. Docket No. G008/M-20-434

CenterPoint Energy Resources Corp. (CenterPoint) proposed an RNG interconnection tariff on April 23, 2020. The Commission approved the tariff with modifications in its January 26, 2021 order. CenterPoint has not yet facilitated a successful RNG interconnection, citing a longer-than-expected interconnection process in its compliance filing on January 31, 2024.

2. Docket Nos. G008/M-21-324 and G999/M-21-566

The Commission also initially directed CenterPoint in its January 26, 2021 order to propose a framework for evaluating and verifying the carbon intensity of various RNG resources. CenterPoint proposed a framework in Docket No. G008/M-21-324, but the Commission suspended the comment period in favor of addressing this topic under a holistic Natural Gas Innovation Act framework in Docket No. G999/M-21-566.

In its June 1, 2022 order in G999/M-21-566, the Commission ordered that any parties procuring renewable natural gas under the Natural Gas Innovation Act should use the GREET framework to account for carbon emissions. The Commission also ordered that Docket No. G008/M-21-324 could be resumed, but no parties took action.

3. Docket Nos. G008/M-23-215 (CenterPoint) and G002/M-23-518 (Xcel)

Northern States Power Co. d/b/a Xcel Energy (Xcel Energy) and CenterPoint both proposed several RNG-related pilots in their Natural Gas Innovation Act (NGIA) petitions. The Commission approved CenterPoint's plan with modifications during its June 25, 2024 agenda meeting (the order has not been filed at the time of this Notice's publication) and anticipates hearing Xcel's plan in early 2025.

4. Docket No. G6915/GP-23-392

Dooley's Natural Gas II, LLC proposed on September 26, 2023 to construct a pipeline to interconnect RNG from four dairy farms to the Alliance natural gas transmission pipeline. The Commission accepted the route permit application as complete on December 20, 2023, and on May 16, 2024, approved the route permit for the 100-foot high-pressure segment, turning the rest of the pipeline over to local counties for permitting approval.

5. Docket No. G011/M-23-489

Minnesota Energy Resources Corp. (MERC) proposed an RNG interconnection tariff and commodity purchase with cost recovery plan on November 28, 2023. The Commission approved the proposal with modifications in its order on May 1, 2024.

6. Docket No. G999/CI-24-202

In the MERC order, the Commission also delegated authority to the Executive Secretary to open a new docket to establish standardized reporting requirements for natural gas utilities seeking to interconnect RNG to their distribution system. This Notice of Comment is being filed to address that directive.

7. Docket No. G004/M-24-73

Great Plains Natural Gas Co. proposed a new tariff to allow RNG producers to interconnect with its gas distribution system on January 12, 2024. The Commission approved the tariff and its related agreements in an order on August 5, 2024.