

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") submits the enclosed comments in support of the Commission's October 9, 2024 Order approving CenterPoint Energy's Natural Gas Innovation Plan, and opposing a request for reconsideration filed by the Office of the Attorney General and supported by Minnesota Center for Environmental Advocacy ("MCEA"), Sierra Club, and Communities Organizing for Latine Power and Action ("COPAL"). It is true that LIUNA did not support the tree planting pilot in our comments on CenterPoint's initial innovation plan, as noted in the reply by MCEA et al, we disagree with petitioners' contention that inclusion of the pilot constitutes a material legal error.

The Natural Gas Innovation Act was designed to give the Commission broad discretion in approving innovative pilot programs that can help advance our understanding of how gas utilities could minimize and mitigate greenhouse gas emissions. No party disputes that tree planting has the potential to capture carbon dioxide generated by combustion of natural gas delivered by CenterPoint, as well as potential to improve the efficiency of buildings heated or cooled by natural gas utilities by providing wind and shade breaks.

We do not believe that the Commission is bound to read the statutory language allowing innovative investments in carbon capture and energy efficiency narrowly, and believe that doing so could unnecessarily hamper the legislature's goal to promote innovation – not just in tree planting but in other areas. While we do not see tree planting or carbon offsets generally as the solution to decarbonizing gas utilities, it is likely that such offsets could have a role in efforts to achieve net-zero emissions, and including a pilot in the resource plan makes it easier to compare the costs and benefits of such offsets to other emerging innovations. We also do not agree that inclusion of the pilot establishes any precedent at all, much less a slippery slope that would somehow force the Commission to abandon other innovation for offsets.

We urge the Commission to deny reconsideration and move forward with the innovation plan as approved.

Thank you for your consideration.

Dated: November 7, 2024

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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