



PARTNERSHIP ON
WASTE AND ENERGY

October 1, 2018

Minnesota Public Utilities Commission
121 7th Place E. Suite 350
Saint Paul, MN 55101-2147

RE: Comments on Docket No. G-008/M-18-547

The Partnership on Waste and Energy supports CenterPoint Energy's proposed RNG pilot program and urges the Minnesota Public Utilities Commission to approve this pilot program. The development of a stable and reliable market for RNG is an important step in supporting the development of solid waste management infrastructure to support recycling of organic waste using anaerobic digestion.

The Governing Board of the Partnership on Waste and Energy is submitting comments on the petition by CenterPoint Energy to Introduce a Renewable Natural Gas (RNG) Pilot Program (Docket No. G-008/M-18-547). The Partnership is a joint powers board including Hennepin County and the Ramsey/Washington Recycling & Energy Board. Through the Partnership the counties collaborate in certain areas of waste and energy management.

The State of Minnesota has established a statutory framework related to solid waste management, with the goal of protecting the State's air, land, water and other natural resources, and the public health. In that framework counties are the only public entities held accountable to meet state goals and requirements. Hennepin, Ramsey and Washington counties have established integrated solid waste systems, and have achieved recycling rates over 50% with the traditional recyclables of paper, glass, metal and plastic. However, state law requires metropolitan counties to achieve a 75% recycling goal by 2030. In order to achieve that goal the recovery and recycling of organic waste, primarily food waste, will be necessary. Organic waste comprises 30% or more of mixed municipal solid waste, and there are hundreds of thousands of tons of organic waste available for recovery.

Organics recycling programs are in the early stages of development, compared to programs for conventional recycling. A key limiting factor to rapidly growing organics recycling in the metro area is available infrastructure to process the organics into beneficial products. Many public and private entities, including the Partnership, are interested in developing anaerobic digestion (AD) as another option to recycle organics. AD has the added benefit of producing clean, renewable energy in the form of biogas which can be used to produce various forms of energy – including RNG.

Anaerobic digestion is not a new technology, and is one with great possibilities to recover resources and energy from organic waste. The Partnership is currently evaluating the introduction of AD into their solid waste system, with an evaluation report commissioned by the Partnership due to be completed by the end of this year. Hennepin County is exploring AD through a request for qualifications to determine interest in developing an AD facility locally. Ramsey and Washington Counties, through the Recycling & Energy Board, are planning on management of organics using AD.

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The Partnership believes that CenterPoint Energy's proposed RNG pilot program will increase demand for RNG, which, in turn will contribute to stronger, stable and reliable markets for RNG. This should result in improved access to financing and reliable revenue streams for facilities that use AD to manage organic waste.

RNG resulting from the digestion of organic waste is an enormous, untapped clean energy resource. Organic feedstocks, especially food waste, and the technology to process them into RNG are widely available. In recent years, the number of AD facilities in North America processing organics continues to steadily increase. The State of California is experiencing the most growth due to the adoption of policies and programs that support managing waste as a resource and increasing the production of clean renewable energy. In addition, AD is developing on the East Coast of the U.S. as a means to handle organic waste. Locally, there is widespread interest in AD development in the private and public sectors.

The RNG pilot program proposed by CenterPoint Energy will help tap a readily available source of clean energy.

Thank you for taking the Partnership's comments into consideration.

A handwritten signature in blue ink that reads "Victoria A. Reinhardt". The signature is written in a cursive, flowing style.

Victoria Reinhardt, Chair
Partnership on Waste and Energy

- c. Commissioner Peter McLaughlin, Hennepin County
Commissioner Fran Miron, Washington County