



18 April 2019

Mr. Daniel Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147
VIA E-FILING

Re: Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program
Docket No. G-008/M-18-547

Dear Mr. Wolf:

The American Biogas Council is the only national trade association representing the entire biogas industry in the U.S. We and the 230 companies we represent are dedicated to maximizing the production and use of biogas from organic waste. Biogas systems recycle organic material like food scraps into renewable energy and soil amendments using anaerobic digestion.

The American Biogas Council supports CenterPoint's proposed Renewable Natural Gas Pilot program. There is great potential to grow the biogas economy in Minnesota, and this Pilot represents an important step towards realizing that potential. Today, Minnesota has 42 operational biogas systems. But we see the potential for more than 450 new projects to be developed based on the estimated amount of available organic material in the state. Constructing this many projects would generate \$1.35 billion in capital investment, and create 11,250 short-term construction jobs, 900 long-term jobs, and numerous industry-supporting jobs. If fully realized, these biogas systems could produce enough electricity to power 86,402 homes (1.1 billion kWh) or enough renewable natural gas to fuel 1,474,557 vehicles. They would also collectively reduce greenhouse gas emissions by the equivalent of 8.2 trillion tons of carbon dioxide, the same as growing 19,586,030 million tree seedlings for ten years or the amount 652,868 acres of U.S. American forest sequester each year.

In its April 9, 2019 Comments in this docket, the Minnesota Department of Commerce took the position that important questions remain about non-transportation uses of RNG, and proposed that the Commission require CenterPoint to host a workshop before it granted CenterPoint approval for the RNG Pilot. The American Biogas Council does not think that further delay is warranted.



While tracking and verification systems for non-transportation RNG are important, it is not necessary or advisable to wait until they are fully developed before taking steps to use biogas resources. Tracking and verification systems can be developed in tandem with or after the launch of the Pilot. In fact, acquiring biogas resources and testing automated metering and data compatibility are one of the things M-RETS is currently working on as it prepares to release a pilot to select projects in early June.

Sending the message to the biogas community that Minnesota supports a low-carbon thermal solution is imperative. If there is any delay in implementing the tracking system, CenterPoint and M-RETS could work out a spreadsheet tracking and verification process that could be uploaded into the system once a permanent solution is in place. We confirmed with the Midwest Renewable Energy Tracking System (MRETS) that they would be agreeable to this should this unlikely situation arise. Furthermore, given the June pilot launch and a fourth-quarter full planned release, the system will likely be set up before CenterPoint has a critical mass of customers that would make a temporary solution unwieldy. CenterPoint still must market and sign up customers, something that should provide an adequate buffer to setting up a more permanent tracking solution.

We urge you to allow CenterPoint to proceed with their RNG program without delay. It's a very important step for the state's embrace of renewable energy and smart one to take for residents, businesses and government.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Patrick Serfass". The signature is fluid and cursive, with the first name "Patrick" and last name "Serfass" clearly distinguishable.

Patrick Serfass, Executive Director