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May 14, 2019

Mr. Daniel Wolf, Executive Secretary
Minnesota Public Utility Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: Fresh Energy, Minnesota Center for Environmental Advocacy, and the Sierra Club's Letter of Clarification in the Matter of CenterPoint Energy's Petition to Introduce a Renewable Natural Gas Program
Docket No. G-008/M-18-547

Dear Executive Secretary Wolf:

Fresh Energy, Minnesota Center for Environmental Advocacy, and the Sierra Club respectfully submit a letter of clarification in response to new issues raised in CenterPoint Energy's second *Reply comments* and the American Biogas Council's *Comments*, both filed on April 18, 2019.

In their April 18th filings, CenterPoint Energy¹ and the American Biogas Council² state that tracking and verification are important yet not essential to the Company's proposed RNG pilot program. While M-RETS may be able to launch a sufficiently rigorous tracking system in good time, the resource-intensive and complex process of scaling a satisfactory verification process will prove considerably more challenging. We would like to note that the RNG verification process is not analogous to verification for renewable electricity markets and requires site visits and desk review of producer-level information on legal, physical, and process parameters for individual batches of RNG.³

CenterPoint Energy maintains that, on its own, it will be able to both verify the renewable nature of the RNG purchased for its pilot program as well as safeguard that this RNG is sold only to the Company. CenterPoint Energy reaffirms that the proposed verification process for their pilot program is similar to that approved by the Vermont Public Utilities Commission for Vermont Gas

¹ CenterPoint Energy. Second reply comments. April 18, 2019. Pg. 4. [Link](#)

² American Biogas Council. Comments. April 18, 2019. Pg. 2. [Link](#)

³ Requirements by the Vermont Public Utilities Commission to verify the renewable claims for the VGS Renewable Natural Gas supply include: (1) confirm the renewable fuel feedstock identification; (2) confirm the product renewable fuel identification; (3) review and confirm the renewable fuel production process; (4) review of fuel flow measurement and quality monitoring process and equipment; (5) review of contracts and affidavits governing the transfer of the RNG from the original source to the end user(s); and (6) review of evidence confirming the existence of a physical path (common carrier pipeline) for RNG transfer and distribution to end users. (see Footnote 6 for citation)

System's voluntary RNG green-tariff.^{4,5} However, an important difference is that Vermont Gas System was ordered to contract with an *independent third-party* to verify the renewable claims for the VGS Renewable Natural Gas supply.⁶

Independent third-party verification for RNG is indispensable to mitigating the risk for fraud and double counting as well as to document the greenhouse gas emissions reductions claimed by producers.⁷ We support robust tracking and verification programs irrespective of the Commission's decision around the Company's proposed Pilot program.

Also in their April 18th filings, CenterPoint Energy⁸ and the American Biogas Council⁹ disagree with the Department's recommendation that the Commission require the Company to host a policy discussion about uses of RNG in Minnesota for non-transportation purposes and assert that this should not be a requirement for Pilot approval. The Company cites a workshop entitled *The Future of Anaerobic Digestion in Minnesota*, facilitated by the Great Plains Institute (GPI) on April 17, 2019, as evidence of collaborative stakeholder work already underway across the state.¹⁰ Representatives from Fresh Energy, the Minnesota Center for Environmental Advocacy, and the Sierra Club attended this invitation-only event. While the workshop represents a good first step, in this instance the limited participant number, participant type, and meeting scope (much of the workshop was focused on the prospects for anaerobic digestion of municipal organic waste streams at the county-level and a scoping report on the same topic prepared by GPI for the Partnership on Waste and Energy¹¹) was not a replacement for larger, more representative stakeholder convenings to inform the economic and environmental prospects for RNG development in Minnesota, including transportation, building, industry, and electric applications.

Thank you for your consideration of our letter.

Sincerely,

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⁴ CenterPoint Energy. First reply comments. March 1, 2019. Pg. 9-10. [Link](#)

⁵ CenterPoint Energy. Second reply comments. April 18, 2019. Pg. 4, Footnote 5. [Link](#)

⁶ VGS Renewable Natural Gas. 2018. Program manual Vermont Gas Systems. Section 3.4. [Link](#)

⁷ Center for Resource Solutions. Initial comments. January 8, 2019. Pg. 3-4. [Link](#)

⁸ CenterPoint Energy. Second reply comments. April 18, 2019. Pg. 4. [Link](#)

⁹ American Biogas Council. Comments. April 18, 2019. Pg. 2. [Link](#)

¹⁰ CenterPoint Energy. Second reply comments. April 18, 2019. Page 6 and Exhibit 1. [Link](#)

¹¹ GPI for the Partnership on Waste and Energy. Anaerobic digestion evaluation study. September 2018. [Link](#)