

June 25, 2020

Will Seuffert, Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**RE: CENTER FOR ENERGY AND ENVIRONMENT'S COMMENTS IN THE MATTER OF CENTERPOINT ENERGY'S PETITION  
TO INTRODUCE A RENEWABLE NATURAL GAS INTERCONNECTION TARIFF  
DOCKET No. G008/M-20-434**

Dear Mr. Seuffert:

Center for Energy and Environment ("CEE") respectfully submits these brief Comments to the Minnesota Public Utilities Commission ("Commission") in response to CenterPoint Energy's April 23, 2020 Petition to introduce a renewable natural gas interconnection tariff ("Petition") in this docket.

CEE supports CenterPoint Energy's petition and appreciates the company bringing this filing forward. CEE believes that, done well, renewable natural gas could play an important role in the endeavor to meet Minnesota's ambitious, economy-wide greenhouse gas reduction goals. While Minnesota has seen great gains in reducing greenhouse gas emissions associated with electric generation, other areas of our economy have lagged behind. Notably, Minnesota has experienced increased emissions from the industrial sector, as well as residential and commercial buildings as compared to 2005 baseline emissions levels. Much of that is due to increased natural gas consumption in those sectors. In fact, according to the U.S. Energy Information Administration, natural gas consumption in Minnesota has been generally increasing since the mid-to-late 1990's.<sup>1</sup>

Given Minnesota's extreme climate and our state's unique mix of energy intensive industrial and agricultural businesses, CEE believes that a broad range of low-carbon strategies and fuels will be needed to successfully meet our state's greenhouse gas emissions reduction goals, especially when it comes to emissions from natural gas end-uses. Certainly, energy efficiency and electrification will play a major role in a low-carbon, Minnesota economy. However, CEE expects that we will also need to deploy other options including renewable natural gas, biogas, hydrogen, and potentially other alternative fuels and technologies as well.

We consider CenterPoint Energy's Petition a first step in building out a local renewable natural gas market, which may allow CenterPoint Energy's customers greater access to this lower-carbon fuel source, while also providing both economic and waste management benefits to the state. We commend CenterPoint Energy for looking to develop local sources for renewable natural gas. This tariff is an important and highly valuable component of the company's renewable natural gas

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<sup>1</sup> This data omits natural gas consumption associated with electric generation.

strategy, particularly as our state is facing an unprecedented economic downturn as a result of the COVID-19 pandemic.

However, additional work is needed in order to accurately and fully quantify and verify the greenhouse gas emissions benefits of renewable natural gas from various sources, both local and national. A more accurate accounting of the greenhouse gas benefits of renewable natural gas would allow Minnesota's regulators, stakeholders, and customers to make more informed choices about investments in the resource.

This accounting and verification work could take place through this docket or outside of this docket. In either case, having a CenterPoint Energy renewable natural gas interconnection tariff in place will bring forward real, local renewable natural gas projects to be studied and assessed for their greenhouse gas emissions benefits. The potential greenhouse gas emissions benefits of renewable natural gas projects vary significantly depending on the characteristics of a project, such as feedstock, baseline methane emissions, and leakage rates. Having local renewable natural gas projects operating and interconnected to the natural gas system could provide better, more accessible data necessary to support a robust carbon accounting analysis. Lessons learned through such analyses may help develop standardized practices and methodologies for carbon accounting for renewable natural gas in Minnesota going forward.

Additionally, we believe that a policy framework will be needed in order to target the use of renewable natural gas to the highest and best use-cases in Minnesota, as it is a fairly expensive and limited resource. CEE and the Great Plains Institute have jointly convened a stakeholder process to begin to explore strategies and pathways to decarbonize Minnesota's energy end-uses currently served by natural gas.<sup>2</sup> This stakeholder process is taking a portfolio approach to identify fuel and technological options to decarbonize Minnesota's natural gas end-uses that meet the needs and characteristics of those specific end-uses. Renewable natural gas is included as a potential decarbonization solution through this process. CenterPoint Energy is an active stakeholder to this convening as well as a member of the advisory committee for the process.

In conclusion, CEE encourages the Commission to approve CenterPoint Energy's Petition. We appreciate the opportunity to provide input to this docket and thank the Commission for its consideration of our remarks. We look forward to hearing from other parties on this important topic.

Please contact me at [apartridge@mncee.org](mailto:apartridge@mncee.org) with any questions.

Sincerely,

/s/

Audrey Partridge  
Regulatory Policy Manager

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<sup>2</sup> These Comments do not represent this broader stakeholder group.

## **AFFIDAVIT OF SERVICE**

**DOCKET NO. G008/M-20-434**

I, Audrey Partridge, hereby certify that on this 25<sup>th</sup> day of June 2020, I served *Center for Energy and Environment's Comments in the Matter of CenterPoint Energy's Petition to Introduce a Renewable Natural Gas Interconnection Tariff* in Docket Number G008/M-20-434 on the following persons on the attached Service Lists by:

XX placing such filing in envelopes, properly addressed, and depositing the same in the Post Office at the City of Minneapolis, for delivery by the United States Post Office as directed by said envelopes.

XX electronic filing

/s/ Audrey Partridge

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