



**PARTNERSHIP ON
WASTE AND ENERGY**
HENNEPIN | RAMSEY | WASHINGTON

June 25, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place E. Suite 350
Saint Paul, MN 55101-2147

Re: Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Interconnection Service
Docket No. G-008/M-20-434

Mr. Seuffert:

The Partnership on Waste and Energy (Partnership) submits this letter in support of CenterPoint Energy's proposed renewable natural gas (RNG) interconnection service. 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 development of a stable and reliable market for RNG is critical to advancing the development of solid waste management infrastructure to support recycling of organic waste using anaerobic digestion (AD) – and pipeline interconnection is an important piece of this puzzle.

Each of the Partnership members are exploring how AD and RNG can support their organic recycling goals. Of particular relevance to this proposal are Hennepin County's plans, because Hennepin County is located within CenterPoint Energy's service territory. Hennepin County is working towards development of an AD facility to support organic recycling programs throughout the County. The financial viability of the County's AD project depends on ability to access markets for RNG. Ability to interconnect with CenterPoint Energy's distribution system will be enormously helpful in achieving Hennepin County's goals. The County has already engaged CenterPoint Energy in discussions about the feasibility of interconnecting to the CenterPoint Energy system, and the initial discussions have been promising.

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 near or 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.

PARTNERSHIP ON WASTE AND ENERGY
HENNEPIN | RAMSEY | WASHINGTON

2785 White Bear Avenue North, Suite 350 | Maplewood, MN 55109
info@morevaluelesstrash.com | 651-266-1199

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 AD in Minnesota as another option to recycle organics. Composting is the most common organics processing method, but AD is a better, higher use for this material. AD has the added benefit of producing clean, renewable energy in the form of biogas. While it is possible to build AD facilities that convert biogas into electricity or other fuels, producing pipeline quality RNG makes the most financial sense, assuming that the County, farm or wastewater treatment plant that produced the RNG is able to access the pipeline system.

One of the challenges for many AD projects is accessing pipelines. CenterPoint Energy's proposed interconnection program could help reduce this barrier. Access to CenterPoint Energy's system may increase the number of sites that are feasible for placement of AD facilities and/or reduce up front infrastructure costs.

Each of the Partnership counties is a member of the American Biogas Council (ABC). The Partnership has reviewed and supports ABC's comments on CenterPoint Energy's proposed RNG Quality Standards. While deviation from the proposed standards may be allowed on a case-by-case base, the Partnership agrees that the proposed standards for oxygen and heating value should be reviewed from a cost-benefit perspective and their potential detrimental impact on facility development.

The number of AD facilities processing organics in North America continues to steadily increase. Locally, there is widespread interest in AD development in the private and public sectors. 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 – such as RNG. Minnesota should do the same.

The Partnership believes that this petition will help increase and meet demand for RNG, which will contribute to stronger, stable and reliable markets for RNG. The result would be improved access to financing for AD development, as well as more reliable revenue streams for facilities that use AD to manage organic waste. The petition will also help tap an enormous, readily available source of clean energy, helping the state reduce reliance on fossil fuels and increasing power generated from a renewable resource. Furthermore, policies and programs that support the conversion of organic waste into biofuels, like RNG, could become the best tools available for substantially reducing the climate impacts of waste.

The Partnership urges the Minnesota Public Utilities Commission to approve CenterPoint Energy's proposed interconnection program.

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

A handwritten signature in black ink, reading "Debbie Goettel". The signature is fluid and cursive, with a large initial "D" and a stylized "G".

Commissioner Debbie Goettel, Chair
Partnership on Waste and Energy

- c. Commissioner Victoria Reinhardt, Ramsey County
Commissioner Fran Miron, Washington County