



May 26, 2020

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

Re: Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Interconnection Tariff

Docket No. G-008/M-20-434

Dear Mr. Seuffert,

Amp Americas II, LLC (“Amp”) submits this letter in support of CenterPoint Energy’s proposed Renewable Natural Gas (“RNG”) interconnection program proposal (the “Petition”) and to urge the Commission to consider the Petition as soon as possible.

Founded in 2011, Amp has unmatched expertise in dairy RNG-to-vehicle fuel projects. Amp strives to help accelerate the conversion of every heavy duty diesel truck to clean, 100% renewable natural gas; to build RNG projects and develop commercial models to convert farm, industrial and municipal waste into sustainable sources of transportation fuel; and to create lasting impact for our people, our communities, our environment and our investors by operating with integrity and driving innovation in our business and our markets.

Amp was the first developer in the country to register fuel pathways under the U.S. EPA’s Renewable Fuel Standard (“RFS”) and the California Air Resources Board’s Low Carbon Fuel Standard (“LCFS”) for its dairy manure-to-RNG fuel project. The project is located at Fair Oaks Farms in northwest Indiana and began commercial operations in 2013. In 2018, Amp funded, developed, and commissioned two additional dairy biogas projects, tripling its aggregate dairy RNG fuel production. Altogether, the three projects generate approximately 600,000 MMBtus, 200,000 LCFS credits and 7 million D3 RINs per year. Amp is headquartered in Chicago and currently has a staff of 32 employees.

Amp is currently developing two new manure-to-RNG fuel production facilities which it plans to commission in 2020 and 2021, respectively. The first such project began construction in 2019 near Morris, Minnesota, and Amp has engaged CenterPoint Energy to provide its natural gas service; however, in the absence of an RNG tariff as contemplated by the Petition, Amp could not engage CenterPoint to interconnect for the receipt of RNG from the Morris project. Instead, Amp had to partner with a Canadian interstate pipeline for such RNG interconnect, which required additional capital and several extra miles of pipeline to deliver RNG from the Morris project into the interconnect.



Amp's second RNG project under development in central Minnesota—slated for 2021 construction and commissioning—would likely benefit from the Petition's proposed CenterPoint RNG Interconnection Tariff. Like Amp's prior projects, the 2021 project will upgrade manure-based biogas, derived from a group of dairy farms near CenterPoint Energy's distribution system, into RNG for transportation fuel to displace diesel. As a result of the displacement, the project will generate D3 RINs under the RFS and LCFS credits under the LCFS. This project will create more than 20 construction jobs and at least 10 permanent technical jobs in rural Minnesota communities. It will displace over 3,250,000 gallons of diesel per year, taking the equivalent of 25,000 cars off the road, and removing 125,000 tons of CO_{2e} per year. Overall, the project will help Amp achieve its goals of converting agricultural waste into a valuable commodity while creating rural jobs, boosting local economies and driving environmental benefits.

Amp has reviewed the Petition, including CenterPoint Energy's proposed rates and terms of service. CenterPoint Energy is not the only interconnection option for Amp's 2021 project, but it offers many benefits compared with Amp's alternatives. Our alternatives include first, interconnecting into an interstate pipeline, which will require Amp to construct its own gathering system. Our second option is to engage a non-regulated party to build the pipeline and interconnection. CenterPoint Energy's distribution system operates at a lower pressure than interstate pipelines, thus an interconnection with CenterPoint Energy would require less capital equipment and lower operating expenses to pressurize the RNG than Amp's alternative options.

Amp thanks the Commission for consideration of these comments and respectfully requests an expeditious review of CenterPoint Energy's Petition. The interconnection plan for Amp's central Minnesota project must be finalized in the coming months in order to meet construction deadlines. As time is of the essence, Amp urges the Commission to approve CenterPoint Energy's Petition by August of 2020, so that we may properly consider a partnership with CenterPoint among our alternatives. We would be very excited to be able to partner with Centerpoint to achieve the environmental and economic benefits of this important RNG project.

Sincerely,



Grant Zimmerman
CEO, Amp Americas