

---

In the Matter of the Petition of CenterPoint  
Energy for a Renewable Natural Gas  
Interconnection Tariff

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

---

## **LIUNA MINNESOTA & NORTH DAKOTA COMMENT**

**JUNE 25, 2020**

The Laborers District Council of Minnesota and North Dakota “LIUNA Minnesota & North Dakota” appreciates the opportunity to offer comments in support of CenterPoint Energy’s proposed Renewable Natural Gas (“RNG”) Interconnection Tariff.

LIUNA Minnesota & North Dakota represents 12,000 unionized construction laborers statewide, including hundreds of members who earn a living building and maintaining natural gas pipelines and distribution lines. Our members are proud of the role they play in ensuring that millions of Minnesotans can count on safe, reliable, and affordable gas service to heat their homes, cook their food, and fuel their businesses.

Climate change is forcing many industries to develop innovative strategies for reducing greenhouse gas emissions, and gas utilities are no exception. In Minnesota, CenterPoint is leading the way, and the company’s proposed RNG tariff is an important building block in an effort that could help meet climate goals while also preserving jobs and ratepayer-funded investments in natural gas infrastructure.

CenterPoint’s proposal would allow Minnesota-based RNG producers to access existing gas infrastructure to move low-carbon and net-zero natural gas to customers nationwide. This would be accomplished at no added cost to ratepayers, since the proposed tariff would allocate those costs to producers, and if successful the initiative could ultimately help lower costs for ratepayers through new revenue from producers.

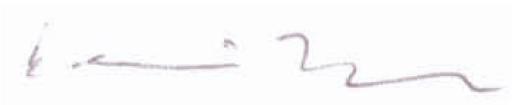
The tariff would create a figurative and literal pipeline for farmers, municipal waste operations and clean energy companies to move captured methane or clean-burning hydrogen to potential customers. Such a pipeline would create opportunities for jobs and economic development, especially in parts of Greater Minnesota where they are needed most. The American Biogas Council estimates that fully developing the state’s renewable natural gas potential could create more than 18,000 construction jobs, and establishing an RNG interconnection tariff is a first essential step.

For LIUNA members, however, it’s not just a question of new jobs but also of preserving existing jobs. In 2019, construction and maintenance of natural gas distribution lines provided family-supporting wages, health and retirement benefits to more than 800 LIUNA members who logged over 900,000 hours of work, of which CenterPoint projects accounted for roughly half. Hundreds more worked on natural gas pipeline projects that serve the distribution system.

Companies like CenterPoint, Xcel, and MERC have been among our most reliable partners and sources of high-quality jobs. We don't know what the future holds for natural gas utilities, but our members who work in the industry want and deserve the opportunity to show that they can contribute to the fight against climate change and build a system capable of helping to meet climate goals.

They won't get that chance, however, unless the Commission approves mechanisms for gas utilities to transport and sell low and zero-carbon natural gas. CenterPoint's proposal is the first step and we urge the Commission to take it.

Respectfully,

A handwritten signature in dark ink, appearing to read "Kevin Pranis", is written over a light blue horizontal line.

Kevin Pranis, Marketing Manager

Dated: June 25, 2020

## Service List Member Information

### Electronic Service Member(s)

Last Name	First Name	Email	Company Name	Delivery Method	View Trade Secret
Ahern	Michael	ahern.michael@dorsey.com	Dorsey & Whitney, LLP	Electronic Service	Yes
Alger	Stuart	sta@mgmllp.com	Malkerson Gunn Martin, LLC	Electronic Service	No
Bell	Brian	bell.brian@dorsey.com	Dorsey and Whitney LLP	Electronic Service	Yes
Bibeau	Frank	frankbibeau@gmail.com	Honor the Earth	Electronic Service	No
Bichler	Seth	sethbichler@fdlrez.com	Fond du Lac Band of Lake Superior Chippewa	Electronic Service	No
Blackburn	Paul	paul@honorearth.org	N/A	Electronic Service	Yes
Boardman	Ellen	eboardman@odonoghuelaw.com	O'Donoghue & O'Donoghue LLP	Electronic Service	No
Brusven	Christina	cbrusven@fredlaw.com	Fredrikson Byron	Electronic Service	Yes
Commerce Attorneys	Generic Notice	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Cummins	Brendan	brendan@cummins-law.com	Cummins & Cummins, LLP	Electronic Service	No
Dyrdal	Donovan	dyr-valley@hughes.net	N/A	Electronic Service	No
Elliott	Grace	grace.elliott@llojibwe.org	Leech Lake Band of Ojibwe	Electronic Service	No
Fatehi	Leili	leili@advocatepllc.com	Sierra Club	Electronic Service	Yes
Friedlander	Anna	afriedlander@odonoghuelaw.com	O'Donoghue & O'Donoghue LLP	Electronic Service	No
Jackson	Samuel	sam@cummins-law.com	N/A	Electronic Service	No
Jensen	Linda	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	Yes
Kingston	Hudson	hudson@advocatepllc.com	Advocate PLLC	Electronic Service	No
Kitze Collins	Rachel	rakitzecollins@locklaw.com	Lockridge Grindeal Nauen PLLP	Electronic Service	No
Madsen	Peter	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Electronic Service	No
Mahlberg	Patrick	pmahlberg@fredlaw.com	Fredrikson & Byron, P.A.	Electronic Service	Yes
Mahowald	Philip	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	Electronic Service	Yes
Meloy	Brian	brian.meloy@stinson.com	Stinson, Leonard, Street LLP	Electronic Service	No
Murphy	Michael	mmurphy@thejacobsonlawgroup.com	N/A	Electronic Service	No

Nauen	Charles	cnnauen@locklaw.com	Lockridge Grindal Nauen	Electronic Service	No
O'Reilly	Ann	ann.oreilly@state.mn.us	Office of Administrative Hearings	Electronic Service	Yes
Plumer	Joseph	joep@whiteearth.com	Red Lake Band of Chippewa Indians	Electronic Service	No
Pranis	Kevin	kpranis@liunagroc.com	Laborers' District Council of MN and ND	Electronic Service	No
Reents	James W.	jwreents@gmail.com	N/A	Electronic Service	Yes
Sanders Reed	Akilah	akilah.project350@gmail.com	N/A	Electronic Service	Yes
Shaddix Elling	Janet	jshaddix@janetshaddix.com	Shaddix And Associates	Electronic Service	Yes
Smith	Richard	grizrs615@gmail.com	Friends of the Headwaters	Electronic Service	No
Strand	Scott	SStrand@elpc.org	Environmental Law & Policy Center	Electronic Service	Yes
Swanson	Eric	eswanson@winthrop.com	Winthrop & Weinstine	Electronic Service	Yes
Van Norman	Sara	sara@svn.legal	Van Norman Law, PLLC	Electronic Service	No
Watts	James	james.watts@enbridge.com	Enbridge Pipelines (North Dakota) LLC	Electronic Service	Yes
Zoll	David	djzoll@locklaw.com	Lockridge Grindal Nauen PLLP	Electronic Service	Yes