
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

JULY 10, 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.

We are pleased to see strong support for CenterPoint’s petition in initial comments, and hope it will be swiftly approved by the Commission so our members can get to work connecting customers to the system. We want to take this opportunity to address concerns expressed by Fresh Energy.

We disagree with Fresh Energy’s contention that the Commission should require CenterPoint to establish or monitor carbon standards for producers in a circumstance where the utility is merely providing conveyance at no cost to retail customers. If Fresh Energy believes that the state should adopt Renewable Natural Gas standards, those standards should be authorized by the legislature as part of a comprehensive strategy to support and regulate RNG production, not tacked on to an Interconnection Tariff. We would further point out that the customers for RNG gas are often purchasing the fuel pursuant to existing standards in the markets where the fuel would be consumed, and it would be duplicative for the Commission to adopt separate standards.

We agree with Fresh Energy that efforts to expand production and use of RNG could benefit from measures to provide affordable means for small producers to connect to the system. The Natural Gas Innovation Act (“NGIA”), which passed the Minnesota Senate by an overwhelming majority in the recently concluded legislative session, would have created a policy framework for the Commission to approve a programs designed to expand access to small RNG producers.

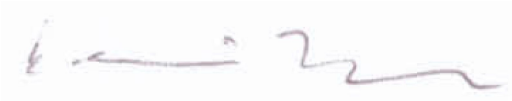
LIUNA Minnesota & North Dakota strongly supported NGIA and were disappointed that the bill was never given a hearing in the Minnesota House of Representatives. We are optimistic that NGIA will be enacted in the 2021 session, and we hope that this time Fresh Energy will join us in encouraging its passage. We do not believe, however, that the Interconnection Petition before the Commission is the

appropriate venue to address potential subsidies for small producers.

We do not think it is reasonable to require renewable natural gas producers that interconnect to the CenterPoint system to pay Conservation Improvement Program ("CIP") charges. RNG producers will not participate in the system as energy consumers, and will therefore not receive any benefit from CIP. Such charges would merely increase costs for producers, potentially restricting participation and thereby undermining the program's environmental goals.

We understand that Fresh Energy, like many clean energy organizations, is skeptical that renewable natural gas can play a role in a low-carbon economy. But on behalf of nearly a thousand of members who make their living installing and maintaining natural gas infrastructure, we want the opportunity to prove that we can be part of the solution. Whatever any of us believe about the future of energy, we do not believe that it would be appropriate for the Commission to deny or overly restrict transmission services for RNG due to unsubstantiated assumptions about the industry's future.

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: July 10, 2020

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