

November 17, 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 PROPOSED ALTERNATIVE DECISION OPTIONS 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 alternative decision options to the Minnesota Public Utilities Commission (Commission) for consideration at the November 19, 2020 Agenda Meeting in the matter of the Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Interconnection Tariff in Docket Number G008/M-20-434.

In its consideration of the 2018 Petition by CenterPoint Energy to Introduce a Renewable Natural Gas Pilot Program,<sup>1</sup> the Commission made clear through its July 26, 2019 deliberation and August 19, 2019 written decision that the Commission is interested in exploring renewable natural gas (RNG) as a potential low-carbon fuel to support Minnesota's clean energy transition and economy. However, at the time of that pilot proposal the Commission determined that additional information was needed to accurately quantify the environmental benefits of RNG, ensure an accurate verification process for those environmental benefits, understand the involvement and nature of local producers, and determine the scalability of Minnesota's RNG resource and market.

CEE believes that the Petition by CenterPoint Energy for an RNG interconnection tariff provides the perfect opportunity for the Commission and other stakeholders to gather the information that was lacking at the time of the 2018 RNG pilot petition and gain greater insight into RNG in Minnesota, which may provide the Commission with the knowledge and data necessary to make future decisions on RNG investments and program offerings.

We encourage the Commission to require specific and detailed reporting requirements for this proposed RNG interconnection tariff. We recommend the Commission adopt the following alternative decision options:

1. This tariff applies to biogenic renewable natural gas, defined as "Pipeline compatible gaseous fuel that has been derived from the anaerobic biological decomposition of organic materials and has lower lifecycle carbon dioxide equivalent (CO<sub>2</sub>e) emissions than geological natural gas."

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<sup>1</sup> Docket Number G-008/M-18-547

2. The company must make a compliance filing for each interconnection, within thirty days of accepting the producer's RNG into its system, with the following information:
  - a. the feedstock or feedstocks of the producer,
  - b. the total amount of RNG volumes expected to be provided by the producer,
  - c. the mix of end-uses of the digestate,
  - d. if known, the state(s) in which the entity or entities purchasing the RNG from the producer are located and the end-use for which the RNG is being purchased,
  - e. methane leakage control and mitigation measures employed by the producer at the production and upgrade facility,
  - f. an estimate of methane leakage for the producer along with a description of the methodology used to develop that estimate, and
  - g. a lifecycle analysis of the greenhouse gas emissions, including emissions associated with the upgrade facility, of RNG volumes provided by the producer, along with a description of the methodology used to develop the lifecycle analysis.
  
3. The company must make an annual compliance filing beginning on February 1, 2022, with the following information:
  - a. the total number of interconnected RNG producers supplying RNG to the CenterPoint Energy system in the previous calendar year,
  - b. the amount of RNG volumes taken onto the CenterPoint Energy system each year in total and from each of those producers,
  - c. the mix of feedstock used by RNG producers connected to the CenterPoint Energy system and volumes provided to the system broken out by primary feedstock for the previous calendar year,
  - d. the mix of end-uses of the digestate for each producer interconnected to CenterPoint Energy's system,
  - e. the estimated methane emissions associated with the total amount of RNG received on the CenterPoint Energy system in the previous calendar year and by primary feedstock, and a description of the methodology for estimating methane emissions,
  - f. estimated lifecycle greenhouse gas emissions, including emissions associated with the upgrade facilities, of the RNG received on CenterPoint Energy's system in the previous calendar year in total and by primary feedstock compared to lifecycle emissions of geological natural gas on CenterPoint Energy's system, along with a description of the methodology for determining those lifecycle greenhouse gas emissions, and
  - g. updated information for each interconnected RNG producer using the same data points as included in the per-producer compliance filing described in decision option 2.
  
4. The data and information provided through the RNG interconnection compliance filings will be used by the Minnesota Department of Commerce and the Commission to evaluate future utility proposals for additional investments in RNG in Minnesota and future program and tariff proposals for RNG in Minnesota.

CEE notes that some of the data points described above may qualify for trade secret protection.

CEE appreciates the opportunity to provide further input to this docket and thanks the Commission for its consideration of our recommended alternative decision options. We look forward to the discussion on November 19<sup>th</sup>.

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

Sincerely,

/s/

Audrey Partridge

Regulatory Policy Manager

**AFFIDAVIT OF SERVICE**

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

I, Audrey Partridge, hereby certify that on this 17<sup>th</sup> day of November 2020, I served *Center for Energy and Environment's Proposed Alternative Decision Options 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  
Audrey Partridge

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