



July 28, 2021

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

RE: In the Matter of a Petition by CenterPoint Energy to Introduce a Carbon Accounting Framework for Renewable Natural Gas and a Threshold Carbon Intensity for Interconnection Producers

In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals

Letter

Docket Nos. G-008/M-21-324, G-999/CI-21-565

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas (“CenterPoint Energy”), Center for Energy and Environment and Fresh Energy (collectively “Joint Commenters”) respectfully submit this letter recommending a procedural path forward for the matters in consideration in Docket No. G-008/M-21-324 in relation with the recently enacted Natural Gas Innovation Act (“NGIA”).¹

On January 26, 2021 in Docket No. G-008/M-20-434, the Minnesota Public Utilities Commission (“Commission”) approved CenterPoint Energy’s proposed renewable natural gas (“RNG”) interconnection tariff, with modifications, and ordered CenterPoint Energy to file a carbon accounting framework and carbon intensity threshold to evaluate and verify the carbon intensity of different RNG sources and validate RNG’s effectiveness in reducing carbon emissions. CenterPoint Energy filed a proposed framework on May 7, 2021. On June 8, 2021, the Commission issued a Notice of Comment period requesting comments on several issues including how the carbon accounting framework established in this docket would relate to the Commission’s responsibilities under the NGIA.

¹ 2021 1st special session, H.F. 6, 117.4-130.6, 139.1-139.8.

The NGIA requires the Commission to issue frameworks for the calculation of the lifecycle greenhouse gas emission intensities of the “innovative resources” defined in NGIA, including RNG as well as biogas, carbon capture, district energy, energy efficiency, strategic electrification, power-to-hydrogen, and power-to-ammonia.² The Joint Commenters believe that the framework established for RNG pursuant to the NGIA will likely also be suitable for calculating lifecycle greenhouse gas intensity of RNG for CenterPoint Energy’s RNG interconnection tariff and any future CenterPoint Energy RNG green tariff program. However, a broader set of stakeholders, such as other gas utilities and clean energy advocates, have an interest in the development of the carbon accounting frameworks to be developed pursuant to the NGIA.

Accordingly, the Joint Commenters propose that the Commission:

- Suspend the comment period in this docket;
- Establish one or more G-999 dockets³ to consider development of carbon accounting frameworks for innovative resources as required by the NGIA;
- Refile or request that CenterPoint Energy refile its initial filing in this docket in one of the G-999 dockets established for NGIA;
- Request comment in the newly established G-999 docket on CenterPoint Energy’s proposal for a RNG carbon accounting framework and carbon intensity threshold for producers interconnecting to their system; and
- Request comment in the newly established G-999 docket on whether CenterPoint Energy’s proposal should serve as a starting point for establishment of a carbon accounting framework for RNG or other innovative resources (i.e. biogas, carbon capture, district energy, energy efficiency, strategic electrification, power-to-hydrogen, and power-to-ammonia) pursuant to the NGIA, and, if so, what, if any, modifications should the Commission make to the proposed framework.

Although not required by NGIA, the Commission may also consider requesting comment on whether carbon intensity thresholds for RNG for other utilities filing innovation plans (beyond CenterPoint Energy) and/or carbon intensity thresholds for other innovative resources (i.e. biogas, carbon capture, district energy, energy efficiency, strategic electrification, power-to-hydrogen, and power-to-ammonia) are warranted.

In addition to ensuring that all interested parties are engaged in the development of the first Minnesota RNG carbon accounting framework, the Joint Commenters believe there is value in developing the carbon accounting framework for RNG at the same time that frameworks are established for other innovative resources, to ensure consistency and comparability. The Joint Commenters are also mindful of the workload and resource constraints of the Commission, the

² See 2021 1st special session, H.F. 6, 129.11-130.5 (requiring the Commission to develop carbon accounting frameworks for each innovative resource, a general framework to compare the lifecycle greenhouse gas intensities of each innovative resource, and a cost-benefit analytic framework to be applied to innovative resources and innovation plans).

³ Or add to an existing or soon to be opened G-999 docket related to carbon accounting frameworks required through NGIA.

Department of Commerce, and other interested parties and believe that our proposal may help avoid unnecessary duplication of work.

Sincerely,

/s/ Joe Dammel

/s/ Erica Larson

/s/ Audrey Partridge

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CERTIFICATE OF SERVICE

Erica Larson served the above Letter of CenterPoint Energy, Fresh Energy, and Center for Energy and Environment to all persons at the addresses indicated on the attached list by having the document delivered by electronic filing.

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