



BIOECONOMY

COALITION OF MINNESOTA

June 25, 2020

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

RE: Comments on Docket No. G-008/M-20-434

Dear Mr. Seuffert:

The Bioeconomy Coalition of Minnesota (www.mnbioeconomy.org) supports CenterPoint Energy's proposed Renewable Natural Gas (RNG) interconnection service petition. Supporting the development of RNG and anaerobic digestion technology in the state of Minnesota can contribute to economic development, state leadership in clean energy technology, reductions in GHG emissions, and environmentally responsible re-use and disposal of organic wastes.

The Bioeconomy Coalition aims to make Minnesota *the place* to build the bioeconomy; adding value to our forestry, agriculture, and organic waste resources. The Coalition uses best available science to inform our strategy while leveraging policy, research and development, marketing, and partnerships to bring projects to reality while working collaboratively across all sectors to make Minnesota a bioeconomy leader. The Coalition's membership includes industry, forestry, agriculture, government entities, utility sector, and NGOs. Developing anaerobic digestion and RNG technology in our state is a priority for our membership.

Interconnection into the natural gas system is critical for market access by RNG producers. The Bioeconomy Coalition's membership includes several organizations seeking to develop RNG projects in Minnesota. Many RNG project developers are seeking to sell RNG to compressed natural gas vehicle operators in markets with Low Carbon Fuel Standard or Clean Fuel Standard policies such as California or Oregon. The Renewable Fuel Standard also provides incentives for the use of RNG as an advanced biofuel. The Bioincentive Program, administered by the Minnesota Department of Agriculture, also provides incentives for production of RNG if used as an advanced biofuel. Furthermore, there is growing demand from the private sector to source RNG to meet corporate sustainability goals. Just as many anaerobic digestion projects have sought access to the electricity grid to sell renewable electricity, today many RNG projects require access to the natural gas system to market their product both in the state of Minnesota and elsewhere. RNG markets and supply are frequently not in the same place, and access to the natural gas system is needed to transport the product to its market. Furthermore,

interconnection to an interstate natural gas pipeline is a requirement for programs like the California Low Carbon Fuel Standard.

The RNG market is in its early stages in Minnesota. A growing industry can provide economic and environmental benefit for the state. RNG can help the state achieve statutory GHG reduction goals. RNG projects will offer economic benefits in communities around the state, and help to manage organic wastes from agriculture, municipal waste, and water treatment. Allowing access to the natural gas system to allow the sale of RNG is an important early step in building an RNG sector.

Thank you for considering our comments.



Brendan Jordan, on behalf of the Bioeconomy Coalition of Minnesota



Facilitated by the Great Plains Institute, the Bioeconomy Coalition of Minnesota aims to make Minnesota THE PLACE to build the bioeconomy, adding value to our forestry, agriculture, and organic waste resources. The Coalition uses best available science to inform our strategy while leveraging policy, research and development, marketing, and partnerships to bring projects to reality while working collaboratively across all sectors to make Minnesota a bioeconomy leader.