

To: Minnesota Public Utilities Commission
From: Vote Solar
Subject: Comments for 100% Carbon Free Standards
Date: September 17, 2025

Dear Minnesota Public Utilities Commissioners,

Vote Solar appreciates the opportunity to provide brief comments regarding Minn. Stat. 216B.1691, subd.1 (b), which was passed in 2023 to create a 100% Carbon Free Standard. Vote Solar believes that now, more than ever, the MN PUC and Minnesota utilities need to double down on renewable energy to reach the state's carbon free goals. Our organization focuses on increasing equitable access to distributed energy resources (DERs), and we support cleaning up the electric grid through various regulatory dockets. Minnesota should not expand the definition of "Carbon Free" to include waste incinerators or other fuel-burning generation.

Utilities like Xcel Energy are already prioritizing renewable energy; for example, Xcel partnered with Sparkfund to initiate a "Distributed Capacity Procurement", or DCP. This DCP aims to support getting DERs online on the distribution grid. Additionally, Xcel modeled distributed generation (DG) as a resource for the utility, in its most recent Integrated Resource Plan. Vote Solar champions DG as a resource because not only does this proposal help reduce the projected energy demand for utilities, but this proposal can help increase DG adoption among customers. These advances show that Minnesota can meet reliability and demand needs through truly clean resources. Expanding the definition of carbon free to include waste incinerators or other fuel-burning technologies would dilute this progress, divert investment away from DERs, and perpetuate pollution burdens rather than building a healthier, more resilient grid.

Vote Solar believes that Minnesota can become a state leader in achieving a 100% Carbon Free Standard, and we believe that the MPUC can lead the charge to ensure that the Standard remains focused on truly clean and renewable alternatives instead of polluting waste incinerators.