



September 17, 2025

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

**Re: Supplemental Comments in the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard - PUC Docket Number/s: E-999/CI-24-352**

Dear Mr. Seuffert,

Thank you for the opportunity to submit supplemental comments to the docket for the Commission's Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard (PUC Docket Number/s: E-999/CI-24-352).

With respect to LCA considerations for woody biomass energy, a great deal more scientific work has been done in this arena than is reflected in the recommendations presented by the Minnesota agencies. For instance, the Minnesota Pollution Control Agency and the Department of Commerce have recommended that the counterfactual for energy produced from wood should be open burning.<sup>1</sup> Assuming that 100% of the "waste" wood, if not burned for energy, will be combusted through open burning, is not a realistic or scientifically valid assumption for a counterfactual scenario. Other counterfactuals that must be considered include natural decay and continued growth and carbon sequestration, in particular since the agencies recommend a definition of "waste biomass" that includes whole living trees.<sup>2</sup>

We have attached an appendix with many of the key documents cited in our previous comments in this and last year's proceedings, which should provide the Commission and agency staff with ample scientific data on considerations for life cycle analyses for woody biomass energy.

Sincerely,

Laura Haight  
US Policy Director

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<sup>1</sup> MPCA and DOC comments to MNPUC, June 5, 2025, p. 18.

<sup>2</sup> Ibid, p. 12.

Attachments: Appendix A

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