



October 28, 2025

Via Electronic Filing

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

Re: Round 4 Initial Comments

In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon-Free Standard under Minn. Stat § 216B.1691
Docket No: E999/CI-23-151

Dear Ms. Bergman:

Central Minnesota Municipal Power Agency, doing business as Central Municipal Power Agency/Services (CMPAS) provides these Initial Comments in response to the Notice for Comment issued on September 12, 2025 in this docket.

We have electronically filed this document with the Minnesota Public Utilities Commission, and copies have been served on the parties on the service list for this docket. Please contact me at (763) 710-3932 or jaya@CMPAS.org with any questions regarding this filing.

Sincerely,

Jay D Anderson
Chief Executive Officer
Central Minnesota Municipal Power Agency/Services

cc: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Katie J. Sieben
Joseph Sullivan
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John A. Tuma
Audrey Partridge

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Commissioner

IN THE MATTER OF AN INVESTIGATION
INTO IMPLEMENTING CHANGES TO THE
RENEWABLE ENERGY STANDARD AND THE
NEWLY CREATED CARBON FREE STANDARD
UNDER MINN. STAT. § 216B.1691
Docket No. E002/CI-23-151

Round 4 Initial Comments of
Central Municipal Power
Agency/Services

Introduction

Central Minnesota Municipal Power Agency, doing business as Central Municipal Power Agency/Services (CMPAS), appreciates the October 17, 2025 Notice of Comment¹ for the issue CMPAS introduced into the record in its October 15, 2025 response to Commission Order Point 1C². CMPAS does not file Initial Comments in response to the October 17, 2025 Notice of Comment, but may file reply comments in response to the initial comments of others.

CMPAS does submit Initial Comments in response to the Minnesota Public Utilities Commission (Commission) Notice of Comment, dated September 12, 2025, regarding the offramps for the Carbon Free Standard (CFS) under Minn. Stat. § 216B.1691, subd. 2b. CMPAS appreciates the chance to submit these comments and looks forward to future opportunities for input.

Topics Open for Comment:

1. In light of the statutory changes made by H.F. No. 7, are any additional clarifications necessary regarding the off-ramp process outlined in the Commission’s March 19, 2010

¹ *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Docket No. E-999/CI-23-151. Minnesota Public Utilities Commission, Notice of Comment. October 17, 2025.

² *In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691*, Docket No. E-999/CI-23-151. Response to Order Point 1C. Central Municipal Power Agency/Services. October 15, 2025.

Order in Docket No. E-999/CI-03-869?

CMPAS appreciates the flexibility indicated in the Commission's March 19, 2010 Order in Docket No. E-999/CI-03-869 and thinks maintaining such flexibility is important, given the variety of utility types and sizes in the state of Minnesota. CMPAS does not currently have suggestions for changes to this off-ramp process. As it stands today, if CMPAS ever felt it was in danger of falling short of compliance targets or if it had any Renewable Energy Credits (RECs) or other environmental attribute credits (EACs) voided by any changes in CFS eligibility, CMPAS would likely buy unbundled RECs to comply, which is part of the existing framework³.

³ Indeed, Order Point 5 of the Commission's March 19, 2010 Order in Docket No. E-999/CI-03-869 requires, as part of any petition for delay or modification, a "discussion of the reasons for concluding that compliance cannot be achieved by buying Renewable Energy Credits".