From: Wufoo
To: Staff, CAO (PUC)
Subject: Submitted Public Comment Form
Date: Wednesday, June 4, 2025 4:56:51 PM

Name *	Mike Karbo
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Provide the docket's number.	E-999/CI-24-352

Leave a comment on the docket. *

To Whom It May Concern:

On behalf of the American Petroleum Institute (API), we appreciate the opportunity to comment on Docket E-999/CI-23-151 regarding implementation of Minnesota's Carbon-Free Standard. API supports nearly 11 million U.S. jobs and is backed by a growing grassroots movement of millions of Americans. Our approximately 600 members produce, process and distribute the majority of the nation's energy. API was formed in 1919 as a standards-setting organization and has developed more than 800 standards to enhance operational and environmental safety, efficiency and sustainability.

API supports the inclusion of CCUS and hydrogen as essential components of a balanced energy strategy, providing dependable, lower-carbon and dispatchable power critical to maintaining grid reliability and meeting Minnesota's emissions goals amid growing electricity demand.

It is essential that the Commission include CCUS and hydrogen as eligible and strategic pathways under the Carbon-Free Standard. These technologies provide realistic, infrastructure-based solutions that can help decarbonize existing assets, support industrial growth, and ensure grid reliability during a period of rapidly increasing power demand.

One of the most significant and fast-moving drivers of demand is the growth of data centers and artificial intelligence (AI) infrastructure. The increasing need for high-performance computing and cloud services is already leading to substantial electricity load additions nationwide, and Minnesota is not exempt. AI and data centers are energy intensive and often require constant, stable power around the clock. Intermittent renewables alone cannot meet this level of firm demand.

In this context, dispatchable, lower-carbon generation like natural gas with CCUS, or hydrogen fired generation, will be crucial to meeting new load requirements while adhering to state carbon mandates. Excluding these technologies could create a mismatch between policy goals and system

needs, forcing reliance on imports or unplanned emergency responses.

A supportive policy framework that incentivizes the deployment of CCUS and hydrogen can foster economic benefits across Minnesota, attract investment and support job creation. CCUS and hydrogen are infrastructure-heavy industries that create long-term, high-quality jobs across construction, fabrication, engineering, and operations. These projects directly support the Midwest's skilled workforce and industrial base while strengthening regional supply chains. Recognizing these technologies in the Carbon-Free Standard pathway would send a clear signal that Minnesota is committed to practical, investable, and scalable decarbonization, not just aspirational targets.

Thank you again for the opportunity to provide input. I urge the Commission to take a balanced, forward-looking approach that incorporates all viable tools for decarbonization, especially those capable of supporting grid stability, industrial development and emerging high-tech demand.

Sincerely,

Mike Karbo
Midwest Region Director
American Petroleum Institute

Attach a File

api_comments_mn_cfs_ccushydrogen_6525.pdf
137.28 KB • PDF

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Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

RE: American Petroleum Institute Comments on Docket E-999/CI-23-151 — Support for Including Carbon Capture, Utilization and Storage (CCUS) and Hydrogen in Carbon-Free Pathways

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