September 17, 2025

VIA E-FILING

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

Re: In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard under Minn. Stat. Sec. 216B.1691, Docket No. E-999/CI-24-352

Dear Ms. Bergman:

Enclosed for filing are the Supplemental Comments and Certificate of Service of the Minnesota Municipal Power Agency ("MMPA") in the above docket.

Please contact me if you have any questions regarding this filing.

Respectfully submitted,

/s/ Kaci W. Poor
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Enc. Supplemental Comments of Minnesota Municipal Power Agency
cc: Service List

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Dear Ms. Bergman:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") January 22, 2025 Notice of Comment Period, the Minnesota Municipal Power Agency ("MMPA") respectfully submits these Supplemental Comments regarding the establishment of criteria and standards necessary for utilities to calculate partial compliance with the Carbon-Free Standard ("CFS") under Minn. Stat. § 216B.1691.

Minnesota's Carbon-Free Standard tasks the Commission with establishing criteria and standards to measure compliance and determine whether utilities are achieving the standard. The record before the Commission provides a practical, uniform path: determine carbon-free status using life-cycle carbon-intensity analysis with established tools such as GREET. This outcome-focused method avoids an overly narrow approach and keeps compliance tied to measurable results. MMPA supports that path and offers the following points to guide a durable, technology-neutral framework that recognizes measurable emission reductions and implements the statute's direction to allow partial compliance.

Renewable Natural Gas with a negative carbon intensity should receive full CFS credit. When biogas projects such as landfill gas and anaerobic digesters demonstrate zero or negative carbon intensity on a life-cycle basis, they deliver the same climate result as any non-emitting resource. Crediting those outcomes as carbon-

free keeps the program aligned with measurable greenhouse gas reductions. Using established life-cycle tools, routine measurement and verification, certificate-level tracking, and anti-double-counting practices keeps records clear and auditable.

Life-cycle tools such as GREET provide a uniform basis to meet the statutory intent of reducing greenhouse gas emissions. Clear life-cycle guidelines promote consistent, transparent decisions across technologies and reduce administrative burden for utilities and the Commission. Established tools such as GREET provide a rigorous, well-documented basis for assessing total greenhouse gas outcomes. A Commission-designated GREET version with Minnesota-appropriate inputs and published update protocols will provide certainty while maintaining rigor. An outcome-based method lets different technologies prove their results without privileging any particular fuel or configuration.

Renewable Natural Gas with carbon intensity less than fossil fuel natural gas should receive partial CFS credit. Where a Renewable Natural Gas (RNG) pathway reduces life-cycle emissions below the fossil baseline but does not reach zero, verified reductions should receive proportional recognition. This outcome-based approach recognizes lasting emissions reductions from captured waste methane and credits resources that document real performance over time. This approach keeps the framework technology neutral, avoids arbitrary distinctions, and maintains fidelity to the statute's purpose. As such, a life-cycle framework that would allocate carbon-free credit to modeled, allocation-based cogeneration pathways should also credit RNG, where the reductions are directly measured and verifiable.

Partial carbon-free credit encourages emission-reducing technologies to be used for electric generation. Recognizing the carbon-free share measured by life-cycle analysis rewards verified performance and provides clear planning signals for utilities. Allowing partial carbon-free credit for electricity generation from RNG will encourage emission-reducing projects consistent with the intent of the statute.

Denial of partial carbon-free credit discourages the emission reductions from Renewable Natural Gas for electric generation. Without partial carbon-free credit, new RNG projects are less likely to proceed, leaving methane vented or flared

rather than directing investment to local, durable emission cuts. A narrow approach risks losing reductions that the program is designed to capture.

Statute requires the Commission to allow for partial compliance with the Carbon-Free Standard. Minnesota Statute §216B.1691, subd. 2d requires the Commission to allow for partial compliance with the Carbon-Free Standard. Implementing partial compliance through a uniform, life-cycle method fulfills that mandate while aligning credit with documented emission reductions. This application advances the statute's purpose and provides an administrable framework for utilities and the Commission.

In conclusion, MMPA respectfully asks the Commission to anchor CFS implementation in life-cycle carbon-intensity analysis using tools such as GREET, to recognize full credit for electricity generation from RNG that demonstrates carbon-neutrality on a life-cycle basis, and to provide partial credit for electricity generation from RNG that delivers measured reductions below fossil natural gas. Transparent, auditable compliance records strengthen confidence in the program and keep credit tied to documented performance. These steps keep the program focused on actual emissions and maintain consistent treatment across technologies.

Dated: September 17, 2025

Respectfully submitted,

/s/ Kaci W. Poor

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CERTIFICATE OF SERVICE

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

Re: In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard under Minn. Stat. Sec. 216B.1691, Docket No. E-999/CI-24-352

The undersigned states that on September 17, 2025, a copy of the Comments of the Minnesota Municipal Power Agency in the above matter were served upon all persons on the Commission-approved mailing list.

/s/ Kaci W. Poor

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