

September 16th, 2025

RE: 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: E-999/CI-24-352

Dear Chair Sieben and Commissioners,

I am writing on behalf of Climate Generation, a local nonprofit that advocates for climate literacy and climate education in Minnesota. Our mission is to challenge the root causes of the climate crisis we are in and False Solutions.

The 100% Carbon Free Standard was a major victory for many reasons. It sent a message that Minnesota is ready for new systems of generating electricity that puts our health before making a profit. It sent a message that Minnesota is ready to take the necessary steps towards a Just Transition away from fossil fuels. This was a huge win for our state and the health of our neighbors.

We are concerned with the way this is being implemented and the door being left open for False Solutions to enter. This law is very clear in its goal and that it is for utility companies to generate or purchase electricity from sources that **do not** emit carbon. The Public Utility Commission welcoming the burning of woody biomass and trash incineration is a disservice to the thousands of residents who organized to get this law passed. It is also a disservice to our collective health.

I would welcome Commissioners to remember that the 100% Law was not the only major environmental bill to pass in 2023. We also saw the Cumulative Impacts law pass- on a technical side this law would require all facilities within an over polluted area to complete an analysis to measure their pollution before getting a permit renewed, expanded, or issued. On a deeper level it recognizes that sources of pollution surround us and it's those sources that are causing irreversible health problems for residents.

Implementing the 100% Law in a way that includes woody biomass and trash incineration would not only make it hard for the Cumulative Impacts law to do its job, but will incentivize more facilities to be built for these two False Solutions. Harmful pollutants like nitrogen oxide, lead, particulate matter, and carbon monoxide will continue to be present in our health if you continue to move forward this way.

We urge you to not weaken the 100% Law with these False Solutions. We urge you to remember what this law was intended to do. We urge you to help us in creating a carbon free Minnesota
Sincerely,

B. Rosas

Climate Generation