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August 20th, 2025

- Via Electronic Filing -

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

**RE: Great River Energy Reply Comments
In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework
for Utility Compliance with Minnesota's Carbon-Free Standard
DOCKET NO. E999/CI-24-352**

Dear Mr. Seuffert:

Pursuant to the Minnesota Public Utilities Commission's ("Commission") July 30, 2025, Notice of Extended Reply Comment Period ("Notice"), Great River Energy ("GRE") submits the following Reply Comments on questions related to implementation of, and compliance with, the new carbon free standard ("CFS") set forth in Minn. Stat. § 216B.1691.

In these Reply Comments, GRE focuses its discussion on the key points raised by the Minnesota Department of Commerce (Department) in its June 5, 2025, Comments. These Reply Comments explicitly address the Department's request for parties to provide recommendations and to complete a summary template for resources of interest.

In response, GRE has completed the summary template below, identifying the resources it considers to be most important for its members and provides additional context for the Commission's consideration:

Technology / Feedstock	Definition	Eligible for CFS Compliance? (Y/N/Other)	Method of GHG Quantification (Specify Model or Generic Method)	LCA Study Period (Yrs)	Baseline	Partial EACs Awarded?	0 EAC Cutoff
Energy Storage	Includes all technologies that store electricity generation to discharge at a later time.	N/A	N/A	N/A	N/A	N/A	N/A

Grid interconnected energy storage as defined by Minn. Stat. § 216B.1691(b), is not a technology that generates electricity. Energy storage operating on the distribution system will be accounted for under the definition of “total retail electric sales.” Therefore, no action is needed from the Commission pertaining to a carbon free accounting methodology for energy storage assets.

Respectfully Submitted.

GREAT RIVER ENERGY

/s/ Zac Ruzycki

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Cc: Service List