



September 17, 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*
Docket No. E-999/CI-24-352

Dear Chair Sieben and Commissioners,

Thank you for the opportunity to comment in this docket, *In the Matter of a Commission investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon Free Standard*. In particular this comment addresses how utilities should calculate partial compliance with the Carbon-Free Standard (subpoint 5 of Question 1).

Carbon Free Definition Should Apply Consistently Throughout the Statute

The legislature provided a clear definition of carbon-free in 2023 when it passed the Carbon Free Standard found in Minn.Stat. 216B.1691, Subd. 1 (b):

Carbon-free: “a technology that generates electricity without emitting carbon dioxide.”

This definition does not allow for technologies that emit carbon dioxide when generating electricity to count toward the Carbon Free Standard. This Carbon Free Standard is entirely new and separate from the Eligible Energy Technologies benchmarks, which existed previously under a different name (Renewable Energy Standard) and which impacts a different list of technologies – many of which are not carbon free and therefore do not work to fulfill the carbon free standard: burning biomass, burning solid waste, burning renewable natural gas for electricity.¹

Thus, several of the questions posed in the notice of the present docket are contrary to the Carbon Free Standard because they involve generating electricity from technologies that emit carbon dioxide.

¹ Each of these standards has distinct language, benchmarks and timelines.

Partial Compliance is for Hybrid Facilities That Use Carbon Free and Non-Carbon Free Technologies

Minn.Stat. §216B.1691 Subd. 2d.(b)(i) says that partial compliance with the carbon free standard should be considered for

"electricity generated from facilities that utilize carbon-free technologies for electricity generation, but only for the percentage that is carbon-free"

This part of the statute is important because it allows for hybrid facilities – those facilities that host both carbon-free and carbon-emitting technologies in their creation of electrical output – to count the portion of the contribution that is carbon-free toward the new carbon free standard.

Hundreds of hybrid electrical generation facilities exist across the country.² Examples of hybrid facilities in Minnesota include facilities employing both wind and fossil fuels in Worthington, Mountain Lake and Northfield. Other systems use solar in addition to fossil generation (see the Flint Hills Refinery).

Fourteen hybrid facilities located in Minnesota are identified in the Berkeley Report of 2024. The partial compliance statute would allow hybrid facilities to count the portion of electricity that comes from carbon free generation toward the Carbon Free Standard. Without this statute, there was a risk

The partial compliance statute should not be used to allow non-carbon free technologies to count toward the statute, even if they employ carbon capture, per the statute language itself which expressly says the non-carbon-free generation should not be counted:

"electricity generated from facilities that utilize carbon-free technologies for electricity generation, but only for the percentage that is carbon-free"

Carbon capture technology does not generate electricity. In fact, carbon capture technologies require extra energy in order to operate. These systems should not be mistaken for a technology that impacts whether or not a particular technology is carbon free. Carbon free technologies are defined by the legislature:

"a technology that generates electricity without emitting carbon dioxide."

² Berkeley Lab, *Hybrid Power Plants: Status of Operating and Proposed Plants*, September 19, 2024. <https://emp.lbl.gov/news/2023-was-another-big-year-newly-installed-and-proposed-hybrid-power-plants-even-ppa>

Thank you for the opportunity to comment. Upholding the definition of carbon-free passed by the legislature in 2023 is critical to moving Minnesota toward our climate goals on a timeline that makes a difference. The PUC's role in upholding this legislation is of the utmost importance.

Sincerely,

A handwritten signature in black ink that reads "Sara Wolff". The signature is fluid and cursive, with "Sara" on the top line and "Wolff" on the bottom line.

Sara Wolff, J.D.
Strategic Policy Director
Minnesota Interfaith Power & Light