

APPENDIX C: DECISION OPTION GUIDE

DO No.	DO Language	POG	EETs	Prop. LCA	Binary LCA	Binary LCA with Waste Wood Exempt.
		DOs 1+2	DOs 1+3	DOs 1+4	DOs 1+5	DOs 1+6

Limits	7	In evaluating compliance or partial compliance, and in evaluating IRPs, the Commission may establish limits on significant additional use of emitting fuels that have been determined to be fully or partially carbon-free based on an LCA.					
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ISO 14040/14044	8	The Commission adopts the International Organization for Standardization's (ISO) Life Cycle Assessment Requirements and Guidelines as best practice for interpreting the statutory definition of "carbon-free," and considers the ISO 14040 and 14044 as the best framework for establishing future LCAs.					
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	9	The Commission adopts a Fuel Pathways framework with the following definitions (choose one or more): A. Carbon-free: A determination of carbon-free is made at the fuel pathway level. "Carbon-free" does not apply to a specific resource or technology, but to the entire fuel pathway of a specific LCA, the boundaries of which will be set by the Commission. B. Compliance: Compliance applies at the generation resource level. i. Full compliance: A generation resource is fully compliant if 100 percent of the electricity generated by the resource is generated based on a fuel pathway determined to be carbon-free. ii. Partial compliance: A generation resource is "partially compliant" if, in the generation of electricity, the resource relies on: (a) Pollution control technology that does not remove 100 percent of the CO2 emissions generated, or (b) A mixture of a CF fuel pathway and a non-CF fuel pathway (e.g., blending of hydrogen produced from an EET with natural gas) C. Comparative Scenario Evaluation (CSE): A counterfactual analysis, to be submitted alongside appropriate LCA studies. D. Partial Credit: Partial credit would apply to CF fuel pathways that are determined to not be carbon-free and, after undergoing a Comparative Scenario Evaluation are ultimately deemed to be a better (i.e., lower net GHG emissions) management opportunity than other options, and, as a result, are granted partial CF credit.					
	10	The responsible government agency's standard of review for determining if a fuel pathway is carbon-free, partially carbon-free, or not carbon-free shall be based upon a carbon intensity threshold level below which a CF fuel pathway is considered CF.					
	11	For blended fuel situations such as hydrogen co-firing, an LCA must be conducted on each individual fuel pathway requiring an LCA, rather than conducting an LCA on a combination of fuel pathways as would occur with fuel blending.					
	12	LCAs shall be conducted based on annual data, consistent with CFS compliance.					

Fuel Pathways Proposal	13	<p>LCA review will use the following procedures (choose one or more):</p> <p>A. The responsible state agency shall review and make a recommendation to the Commission on approving or denying the results of an LCA conducted by or on behalf of a utility.</p> <p>B. The utility proposing a new CF fuel pathway for compliance demonstration purposes is responsible for conducting and providing the results of an LCA for review.</p> <p>C. Once an LCA is submitted to the responsible state agency for review, the review should be completed and approved or denied by the Commission within six months.</p> <p>D. If an LCA conducted by or on behalf of a utility is ultimately denied for a given fuel pathway by the Commission, the utility may appeal the decision.</p> <p>E. If an LCA conducted by or on behalf of a utility is ultimately denied for a given fuel pathway by the Commission, another LCA analysis for the denied fuel pathway may be undertaken by the same or another utility.</p> <p>F. Once the LCA results for a given CF fuel pathway have been approved by the responsible government agency, that CF fuel pathway shall be added to an “approved CF fuel pathways” list that other utilities can rely on without needing to conduct another LCA. In order to rely on the “approved CF fuel pathways” list, the resource relying on the list must have similar source and production pathways as the resource on the list.</p> <p>G. Utilities are encouraged to file during a resource plan or resource acquisition proceeding, but may file at any time.</p> <p>H. A process of public comment will transpire after the proposed LCA has been submitted.</p> <p>I. As part of its review of the proposed LCA, where appropriate, the responsible state agency will also conduct a review and provide a recommendation for a comparative scenario analysis submitted by the utility. (Staff proposed)</p> <p>J. The responsible state agency will maintain a repository of “approved CF fuel pathways” and “approved counterfactual fuel pathways” available for public use on the agency’s website. (Staff proposed)</p>					
Model	14	<p>Each individual project (electricity generator) shall be paired with the appropriate model when conducting a lifecycle analysis. The following models and sources may be used when submitting an LCA for Commission consideration and approval (choose one or more):</p> <p>A. Argonne National Laboratory’s Greenhouse Gasses, Regulation Emissions, and Energy Use in Transportation (GREET) model</p> <p>B. Environmental Protection Agency’s Waste Reduction Model (WARM) model</p> <p>C. Environmental Protection Agency’s Landfill Gas Emissions Model (LandGEM) model</p> <p>D. California Biomass Residue Emissions Characterization (C-BREC) model</p> <p>E. New/additional models and methodologies as may be developed or refined over time</p>					
	15	<p>In lieu of conducting an LCA, parties may use (choose one or more):</p> <p>A. Prior studies and literature reviews, such as the University at Buffalo’s study on Waste-to-Energy facilities, if they are for a similar fuel pathway;</p> <p>B. Credible sources of existing LCA analysis results</p>					
Scope, Boundary, and Study Period	16	The LCA scope and boundary for a carbon-free generation source shall begin with the existence and acquisition of the fuel; for solid waste and biomass materials, this is the point at which the material is generated and requires some kind of management.					
	17	When conducting an LCA Study, and where appropriate, parties must use the scope and boundary proposed by Olmsted County in Figure 1 of its June 5, 2025 Comments in Docket No. E999/CI-24-352.					
	18	The scope and boundary of the fuel LCA shall include the biogenic emission carbon cycle for all relevant LCAs. A. For these LCAs, there shall be a study period of at least 100 years.					
	19	The study period of the LCA shall align with the life of the resource or beneficial use program.					
Counterfactuals	20	Counterfactual evaluations shall be permitted in the LCA process.					
	21	Utilities shall develop their own avoided emissions base case scenarios, as appropriate, to use in a fuel LCA study.					
Quantified GHGs	22	<p>LCA studies shall quantify the following greenhouse gases (choose one or more):</p> <p>A. Carbon dioxide</p> <p>B. Methane, using a carbon equivalency (“CO2e”) value</p> <p>C. Nitrous Oxides, using carbon equivalency values</p> <p>D. Any other greenhouse gases considered relevant in the study, using carbon equivalency values</p>					

Input Electricity	23	For all claims of carbon-free electricity used in a life-cycle analysis where the fuel requires processing using electricity before the fuel is combused (choose one or more): A. The utility must include hourly matching for CFS-eligible generation sources; B. The utility must specify the source of carbon-free electricity; and C. If a utility does not propose carbon-free electricity, the utility should use the whole MISO territory or LRZ 1 annual grid emissions.					
	24	For all electricity generation processes subject to lifecycle analysis requirements in which the primary electricity input energy is greater than 25 percent of output energy (choose one or more): A. The utility must submit annual documentation with its CFS compliance filing to demonstrate hourly matching of carbon-free electricity generation; and B. The utility must plan new carbon-free resources to match all new electricity generation.					
Re-Evaluations	25	For existing assets, lifecycle emissions shall be reevaluated no sooner than every five years.					
	26	For new capital projects, lifecycle emissions shall be reevaluated after the initial capital expenditure is expected to be paid off, to be determined at the time of CFS eligibility.					
	27	For new capital projects, lifecycle emissions shall be reevaluated no sooner than after the capital project is fully depreciated.					
	28	Once a resource qualifies as carbon-free or partially carbon-free, that designation shall remain in place for the duration of the lifetime of the asset, unless and until significant modifications are made to the fuel type of generation resource.					
	29	For any fuel mix determined to be carbon-free from a life-cycle analysis study, if that fuel mix deviates by more than ten percent, the utility must submit a new or revised lifecycle analysis and issue a new carbon-free percentage, if applicable.					
Credits and Allocators	30	For generation resources determined to be partially carbon-free based on a life-cycle analysis, the Commission will consider the whole portfolio of an entity in determining partial eligibility percentage, i.e., the aggregate carbon intensity score of the fuels used.					
	31	For generation resources determined to be partially carbon-free based on a life-cycle analysis, CFS-obligated utilities must report carbon-free MWh commensurate with the percentage that facility is considered to be carbon-free.					
	32	The Commission orders the following (choose one or more): A. Environmental Attribute Credits shall be issued equivalent to metered generation on a per MWh basis; B. A single Environmental Attribute Credit be issued for all generation that may be retired to demonstrate both EETS and CFS compliance; C. A carbon-free allocator, which defines the percentage of CFS eligible generation, must be used for any generation facility that is partially CFS compliant; and D. For all generation made in a CFS partial compliant facility that is not eligible for the EETS, metered generation in A. shall be multiplied by C. to determine the whole number of Environmental Attribute Credits to issue that are only eligible for the CFS.					
	33	The Commission requires all partially compliant input energy claims in a secondary process to factor in the total output electricity of the partially compliant resource and its carbon-free allocator.					
	34	The Commission delegates to the Executive Secretary authority to begin proceedings to establish a process to translate renewable thermal credits to an Environmental Attribute Credit for compliance tracking purposes.					
Health Metrics	35	For biomass, RNG, and solid waste facilities, utility planning and tracking processes shall quantify and analyze the deaths and morbidity caused by these facilities to communities in Minnesota and other jurisdictions. Such modeling must also account for economic harm, property value losses, harms to rural population and ways of life, harms to family farming, and known pollution impacts.					
Compliance Filings	36	Beginning in 2026, each electric utility subject to the Carbon-Free Standard shall include in their annual compliance report in Docket No. E-999/PR-YR-12: (choose one or more) A. For any fuel determined to be carbon-free from a life-cycle analysis study, utilities must report the composition of the fuel mix compared to the modeled lifecycle analysis. B. For any fuel determined to be carbon-free from a life-cycle analysis study, utilities must report: electricity used to generate electricity, marginal energy attribute credit (EAC) retirements to match all electricity use (hourly or annual), and weighted average trucking mileage for each generation facility that uses the exemption.					
	37	Utilities subject to the CFS and intending to use an LCA must notify the Commission and offer basic information about the relevant resources and fuel types and sourcing within 60 days of the Commission's Order in the current proceeding.					

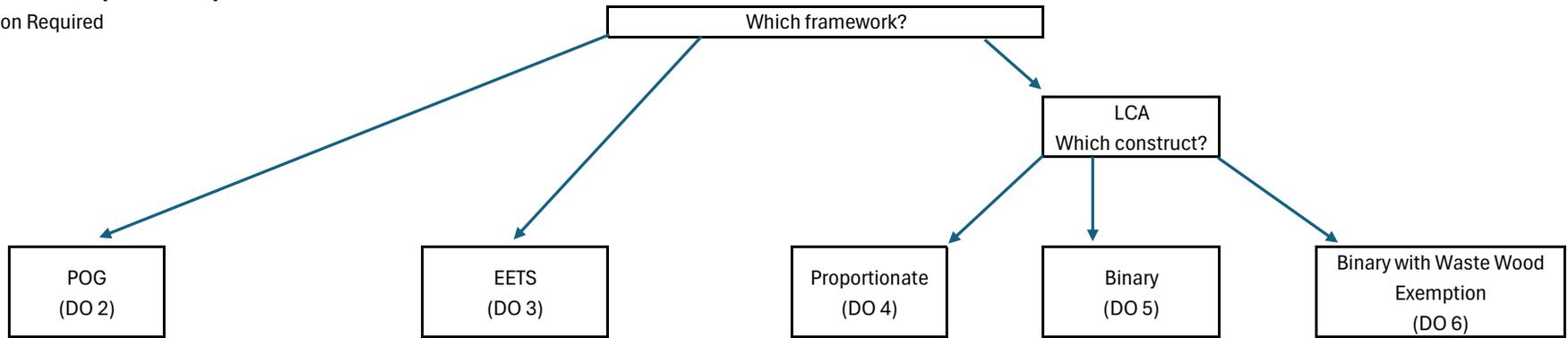
Biomass	38	<p>Primary biomass shall not be eligible for CFS compliance. Primary biomass is defined as:</p> <ul style="list-style-type: none"> -Biomass that is intentionally cultivated, harvested, and prepared for use, in whole or in part, as a fuel for the generation of electricity. -As farm-grown closed-loop biomass as defined in Minn. Stat. §216B.2424, subd. 1(a)(1). 				
	39	<p>Waste biomass shall be eligible for CFS compliance. Waste biomass is defined as (choose one or more):</p> <p>A. Biomass derived from secondary activities including but not limited to:</p> <ol style="list-style-type: none"> 1. Wood waste from storm damage, disease or infestation, utility line maintenance, waste from forest products manufacturing; 2. Agricultural activities including manure; 3. Food waste and other organic waste. <p>B. Biomass that results in lower greenhouse gases than the alternative disposal method.</p> <p>C. Biomass that is not deliberately generated or created for use as a fuel feedstock, but is a by-product of the functions of society, or the result of natural forces such as pests, disease and storm damage, and requires some type of management or disposal on an ongoing basis, irrespective of the opportunities for or need for energy production.</p>				
	40	<p>Sustainable woody biomass shall be eligible for CFS compliance. Sustainable woody biomass is defined in Minn. Stat. § 216B.2424, subd. 1(d).</p>				
	41	<p>Sustainable woody biomass shall be eligible for CFS compliance. Sustainable woody biomass is defined as (choose one or more):</p> <ol style="list-style-type: none"> A. From whole dead, dying, damaged, and/or diseased trees salvaged after wildfire, windstorm, or insect infestation; other wood debris in the forest; B. The by-product of forest management from routine maintenance, natural disasters, or hazardous fuel reduction including trees and woody plants (limbs, tops, needles, leaves, and other woody parts) grown in a forest, woodland, rangeland, or the urban and community environment; C. Wood biomass associated with secondary harvest of logging residuals; tops, limbs, and unmarketable material from harvest operations; D. Manufactured wood pellets; E. Wood-based construction debris and waste; F. Non-hazardous secondary materials such as wood-based paper-mill residuals, saw-mill residuals (including bark, sawdust, chips), and railroad ties, consistent with their treatment in EPA rule 40 CFR Part 241; G. Material sourced by trained logging professionals implementing the Minnesota Forest Resources Council Voluntary Site-Level Guidelines for Forest Management, which includes biomass harvesting guidelines. 				
	42	<p>In a woody biomass LCA counterfactual analysis, open burning shall be the default alternative management method.</p>				
43	<p>When performing a lifecycle analysis for woody biomass, the following assumptions shall be used when relevant and to the extent possible (choose one or more):</p> <p>A. System boundary assumptions</p> <ol style="list-style-type: none"> 1) Include forest growth and decay/fire emissions 2) Include energy combustion emissions with scrubbers 3) Include harvest, transport, and processing emissions (not for mill residues) 4) Indirect land use changes will not occur 5) Account for counterfactual scenarios (e.g., what would have happened to the biomass if not used for energy, e.g., wildfire, landfill, and decomposition) <p>B. Carbon assumptions:</p> <ol style="list-style-type: none"> 1) Assume biomass is inherently carbon neutral, based on regrowth of forests 2) Use the 100 year planning horizon that accounts for delayed carbon sequestration 3) Assume that emissions from combustion may take decades to be offset by regrowth <p>C. Feedstock type and source assumptions:</p> <ol style="list-style-type: none"> 1) Forest residues (branches, tops, unmarketable material) 2) Mill residues (sawdust, bark) 3) Construction debris 4) Whole wildfire, wind, or insect-damaged trees <p>D. Forest management practice assumptions:</p> <ol style="list-style-type: none"> 1) Assume the forest is actively managed for natural or planted regrowth and not converted to other uses (e.g., agriculture) 2) Assume the forest is actively managed using sustainable forestry, following harvesting best management practices with trained loggers. <p>E. Geographic and temporal scope assumptions:</p> <ol style="list-style-type: none"> 1) Assume the entire forest of Minnesota, including its species and age class-specific growth, mortality, and removals 2) Assume the entire forest of Minnesota, with its associated biogenic cycle emissions, with and without its use for electricity generation; 3) Assume over a 100-year timeframe <p>F. Energy system displacement assumptions:</p> <ol style="list-style-type: none"> 1) Assume biomass displaces the current use of coal. 					

	44	The University of Minnesota’s 2024 report conducted for the Minnesota Forest Resources Council entitled “Estimated current and future carbon stocks and emissions in Minnesota forests and forest products under multiple management scenarios” shall serve as default guidance for parties conducting a woody biomass LCA.					
	45	The Commission delegates to the Executive Secretary the authority to establish and set procedural schedules for a working group to make recommendations to the Commission on standards necessary to verify that biomass qualifies as waste biomass ensures compliance under the definition established by the Commission. A. One function of the biomass workgroup shall be to make recommendations about which types of waste biomass should be exempt from LCA.					
Solid Waste	46	For WTE and RDF facilities using MSW feedstock, the counterfactual used shall be “worst case emissions municipal solid waste landfill.”					
	47	LCA assumptions using a landfill counterfactual shall incorporate realistic landfill methane gas collection percentages and gas-to-energy recovery efficiency.					
	48	In LCAs, parties must incorporate GHG offsets resulting from the recycling or other beneficial use of components found in the MSW that is being processed for use or otherwise used as a fuel.					
RNG	49	RNG and other fuels purchased with associated renewable thermal credits tracked through M-RETS that have already conducted an LCA are eligible for the CFS without requiring a new LCA.					
	50	RNG from large scale animal operations (“CAFOs”) shall not be eligible for carbon-free credit.					
	51	RNG projects shall not be considered carbon-free unless the utilities applying for credit provide an accounting of externalities, leakage, and foreseeable economic and social impacts of RNG production and use.					
	52	MSW landfilling shall be used as the primary counterfactual for RNG. When possible, parties conducting LCAs on RNG shall use a blended counterfactual that also accounts for composting and/or anaerobic digestion without RNG.					
CCS	53	Facilities that employ carbon capture and sequestration/storage systems shall be eligible for partial CFS compliance.					
	54	Facilities that employ carbon capture and sequestration/storage systems shall not be eligible for full or partial CFS compliance.					
	55	To demonstrate partial compliance due to the presence of the CCS system, utilities employing CCS technologies do not have to provide an LCA.					
	56	Once the Commission has determined a CO2/MWh value for a plant using CCS considering direct, upstream, and downstream emissions, it will give partial compliance credit to that plant commensurate with the percent reduction in CO2 emissions per MWh attributable to the CCS project.					
	57	Facilities with a CCS system seeking partial CFS compliance credit shall use Minnesota’s proposed formula, where: A. The point of measurement for the total megawatt-hours generated and transmitted to the grid would be the last revenue quality meter upstream of the substation connecting the generating unit(s) into the transmission grid system (net meter); B. The point of measurement for the CO2 sequestered would be the flow meters identified in the EPA approved monitoring, reporting, and verification plan pursuant to 40 CFR Part 98 Subpart RR, or other equivalent independently approved reporting plan; and C. The point of measurement for the CO2 generated from the electric generating units would be the continuous emissions monitors identified in the air monitoring plan submitted in accordance with 40 CFR Part 75 monitoring plan for the associated electric generating unit(s).					
	58	No carbon-free credit shall be given for facilities where the captured carbon is used for enhanced oil recovery.					
Hydrogen	59	The following facilities are eligible for partial CFS compliance (choose one or more): A. Facilities that burn hydrogen produced from EETS via electrolysis (green H2); B. Facilities that burn hydrogen produced from non-biomass EETS via electrolysis (green H2); C. Facilities that burn hydrogen produced from nuclear via electrolysis (pink H2); D. Facilities that burn hydrogen extracted from natural geological sources (white H2); E. Facilities that burn other forms of hydrogen, pending the results of an LCA.					
	60	Facilities that burn hydrogen shall be eligible for partial CFS compliance, pending the outcome of a lifecycle analysis.					
	61	Facilities that burn hydrogen shall be eligible for partial CFS compliance, provided those facilities account for indirect upstream emissions associated with fuel production.					
	62	Facilities that burn hydrogen shall be eligible for partial CFS compliance and do not need to submit a lifecycle analysis.					
	63	Facilities that burn hydrogen shall not be eligible for full or partial CFS compliance at this time.					
	64	The Commission delegates to the Executive Secretary the authority to begin a new proceeding on whether hydrogen may be eligible for the CFS.					
	65	For a generation facility that burns any amount of partially carbon-free resources mixed with any other fuel (choose one or more): A. The base case emissions shall be derived from the primary fuel source that is displaced by the partially carbon-free electricity; and B. If the primary fuel source is partially carbon-free, the base case shall be the base case used to determine the carbon-free percentage of the primary resource.					

	66	The percentage of partial compliance credit shall be determined by the percentage reduction in CO2/MWh at the plant, adjusted for the upstream emissions due to the hydrogen production process (i.e., color) based on federal 45V tax credit guidance.				
	67	The percentage of partial credit at a hydrogen co-firing facility shall be determined by the following equation: Direct Emissions + Indirect Emissions – Emissions Displaced by CF Fuel Mixing = Net Compliance Percentage				
	68	For a carbon-free fuel pathway, the percentage of the annual net generation in MWh, based upon MMBtu heat input from that CF fuel, should contribute to compliance demonstration. Any hydrogen blended with natural gas can be analyzed on a heat input (MMBtu/MWh) basis.				
	69	When hydrogen is combusted with other fuels, the utility shall conduct an engineering study to determine whether the final output ratio of fuels is the same as the initial input ratio.				
Storage	70	Energy storage assets shall be treated as load for CFS compliance purposes, unless storage assets are used to substantiate hourly matching requirements. In order to qualify storage assets for CFS eligibility, the asset must (choose one or more): A. Retire hourly EACs to match charging from fully CFS-eligible resources; and B. Generate hourly EACs to match discharging.				
	71	The Commission declines to adopt a separate accounting methodology for storage assets.				
Net Market Purchases	72	The Commission adopts following list of resources to be eligible as carbon-free for net market purchase compliance (choose one or more): A. Wind B. Solar C. Hydropower D. Hydropower with a nameplate capacity of 100 MW or greater, if built before February 8, 2023 E. Geothermal F. Nuclear				
	73	The Commission declines to determine which resources in net market purchases shall be eligible as carbon-free at this time.				
Other Resources	74	All types of emitting generation, including fossil fuels, may submit an LCA to attempt to qualify for the CFS.				

Framework (DOs 2-6)

Decision Required



If POG, see:

- Credits and Allocators (DOs 30-34-33)
- CCS (DOs 53-58)
- H2 (DOs 59-69)
- Storage (DOs 70-71)
- Net Market Purchases (DOs 72-73)

If EETS, see:

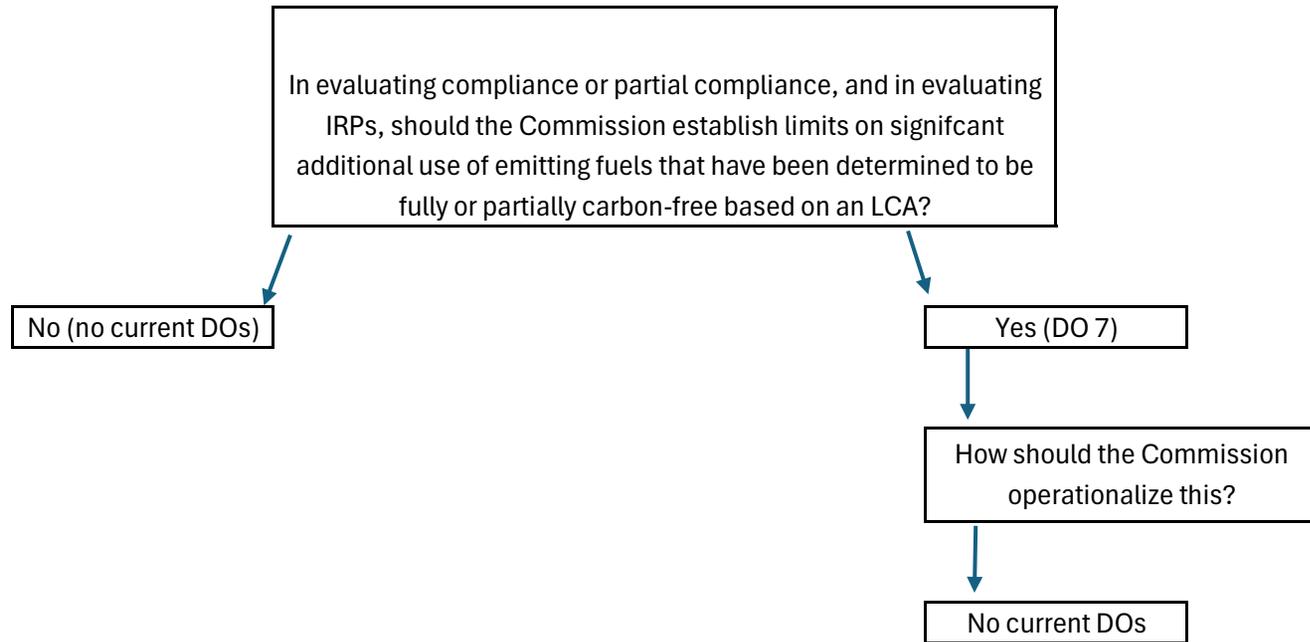
- Limits (DO 7)
- Credits and Allocators (DOs 30-34-33)
- Health Metrics (DO 35)
- Compliance Filings (DOs 36-37)
- Biomass (DOs 38-45)
- Solid Waste (DOs 46-48)
- RNG (DOs 49-52)
- CCS (DOs 53-58)
- H2 (DOs 59-69)
- Storage (DOs 70-71)
- Net Market Purchases (DOs 72-73)

If any LCA, see:

- Limits (DO 7)
- ISO 14040/14044 (DO 8)
- Fuel Pathways Proposal (DOs 9-13)
- Model (DOs 14-15)
- Scope, Boundary, and Study Period (DOs 16-19)
- Counterfactuals (DOs 20-21)
- Quantified GHGs (DO 22)
- Input Electricity (DOs 23-24)
- Re-Evaluations (DOs 25-29)
- Credits and Allocators (DOs 30-34-33)
- Health Metrics (DO 35)
- Compliance Filings (DOs 36-37)
- Biomass (DOs 38-45)
- Solid Waste (DOs 46-48)
- RNG (DOs 49-52)
- CCS (DOs 53-58)
- H2 (DOs 59-69)
- Storage (DOs 70-71)
- Net Market Purchases (DOs 72-73)
- Other Resources (DO 74)

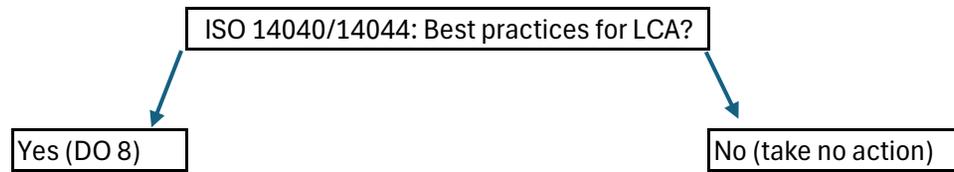
Limits (DO 7)

Only decide if EETS or LCA framework chosen



ISO 14040/14044 (DO 8)

Only decide if LCA framework chosen

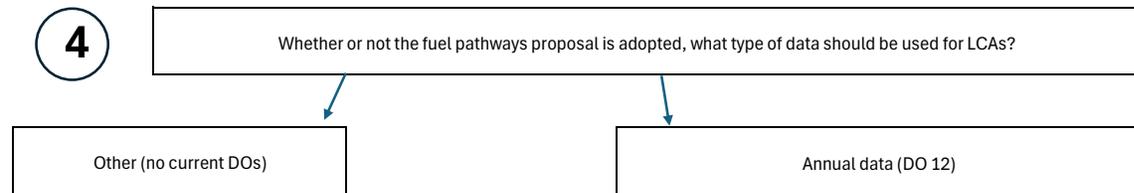
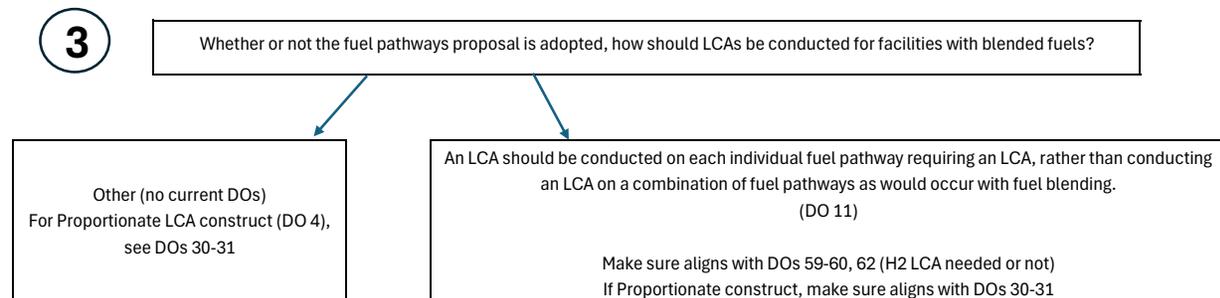
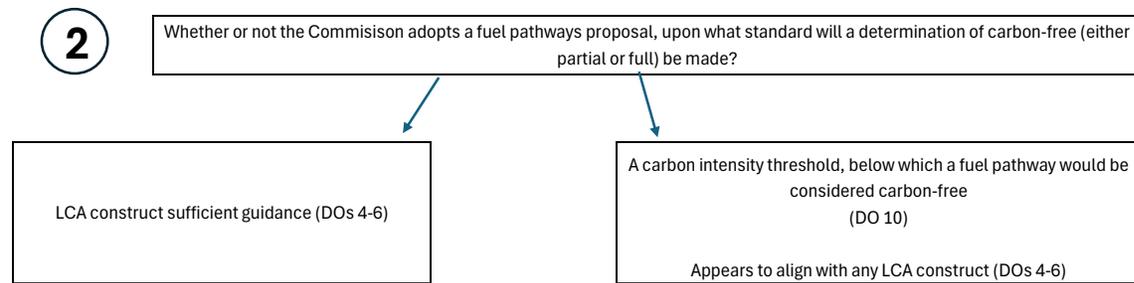


Fuel Pathways Proposal (DOs 9-13)

Only decide if LCA framework chosen

1 Should the Commission adopt Xcel's fuel pathways proposal? (choose one or more)

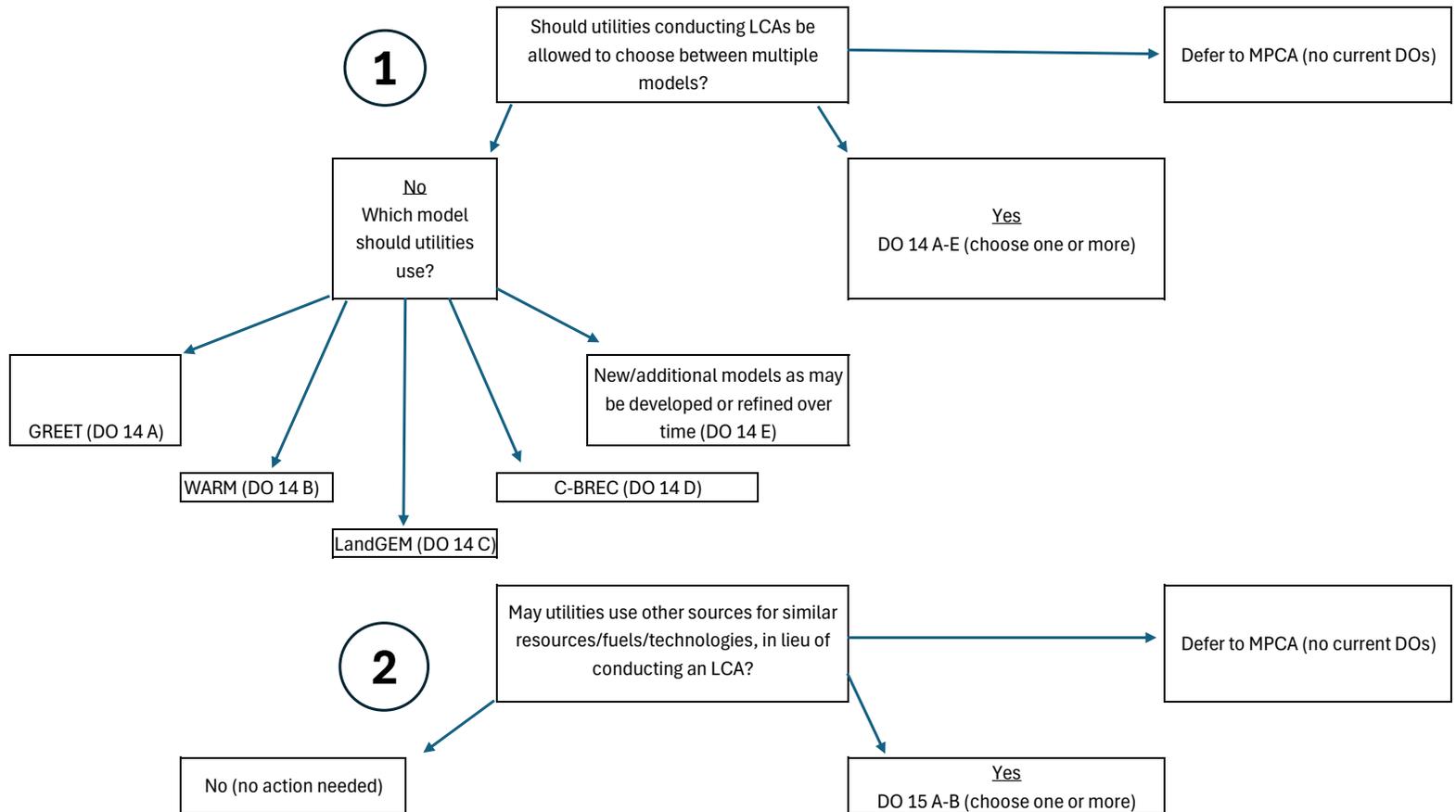
No (no current DOs)	9A
	9B
	9B(i) Make sure this aligns with LCA framework (DOs 4-6)
	9B(ii) Make sure this aligns with LCA framework (DOs 4-6), CCS eligibility (DOs 53-54), and H2 eligibility (DOs 59-63)
	9C Make sure this aligns with DOs 20-21 (counterfactuals), DO 42 (biomass counterfactual), DO 46-47 (MSW counterfactual), DO 52 (RNG counterfactual)
9D Consider LCA frameworks (DOs 4-6)	



5 Whether or not the fuel pathways proposal is adopted, what procedure should utilities follow for submitting and getting approval for an LCA? (DOs 13 A-J, choose one or more)

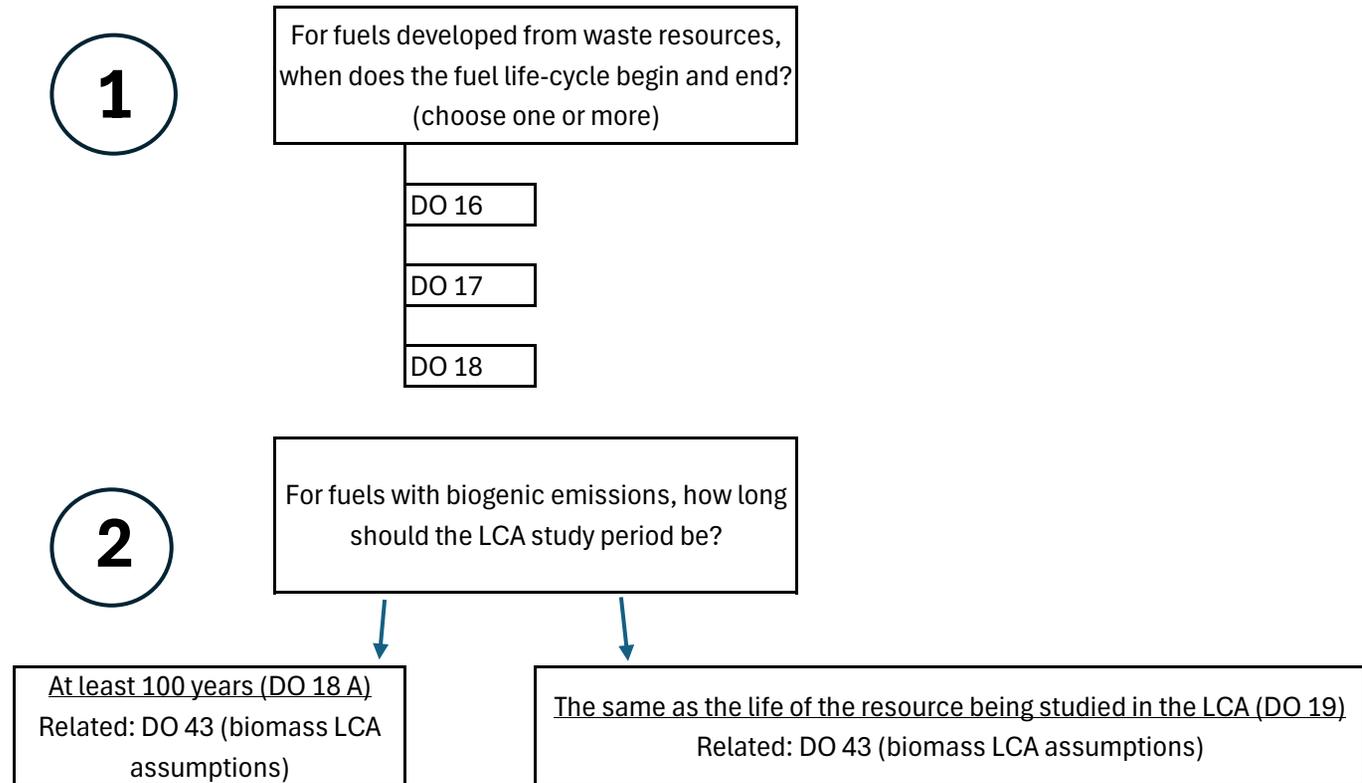
Model (DOs 14-15)

Only decide if LCA framework chosen



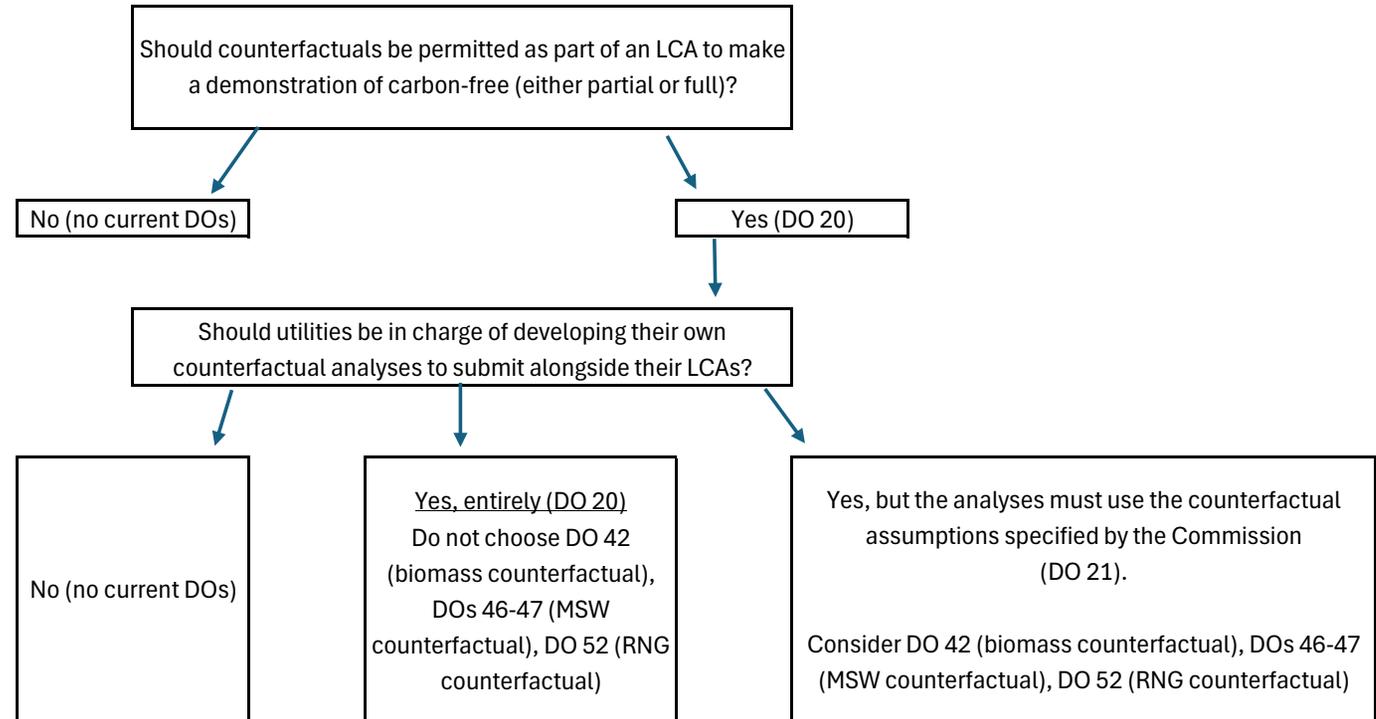
Scope, System Boundary, and Study Period (DOs 16-19)

Only decide if LCA framework chosen



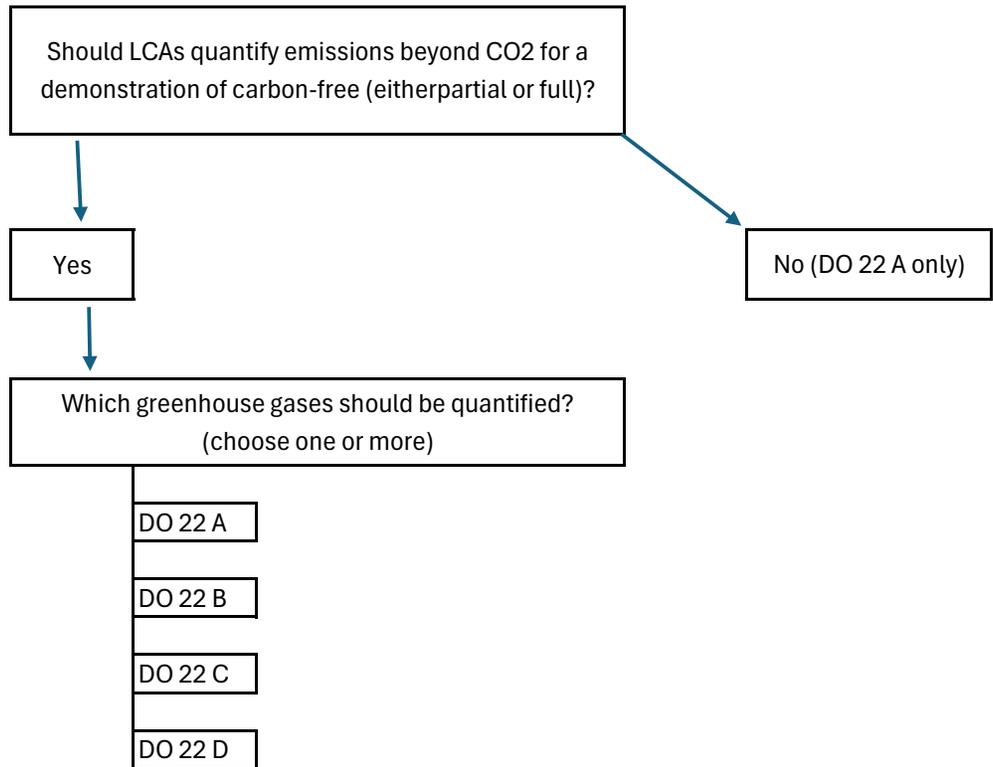
Counterfactuals (DOs 20-21)

Only decide if LCA framework chosen



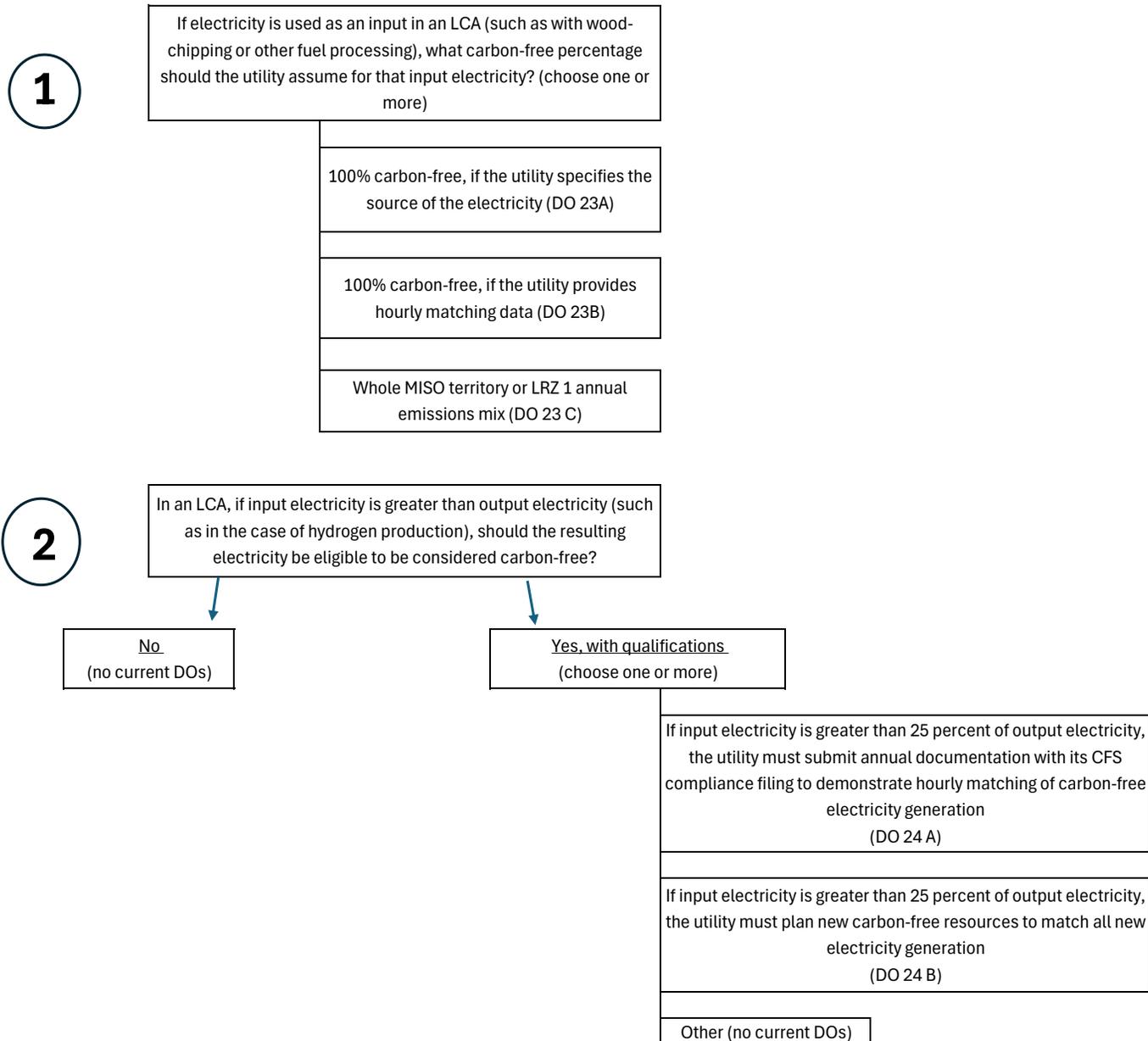
Quantified GHGs (DO 22)

Only decide if LCA framework chosen



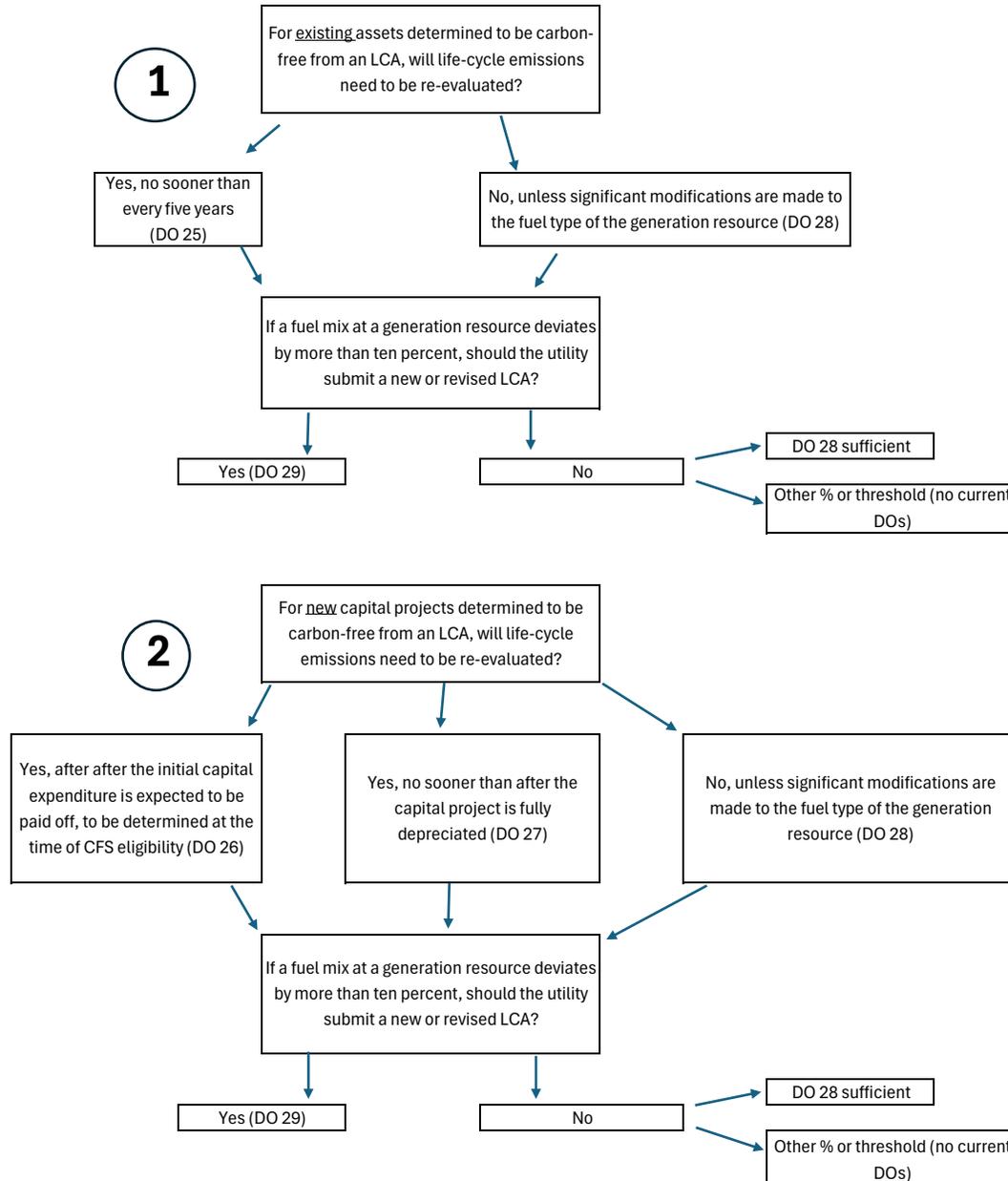
Input Electricity (DOs 23-24)

Only decide if LCA framework chosen



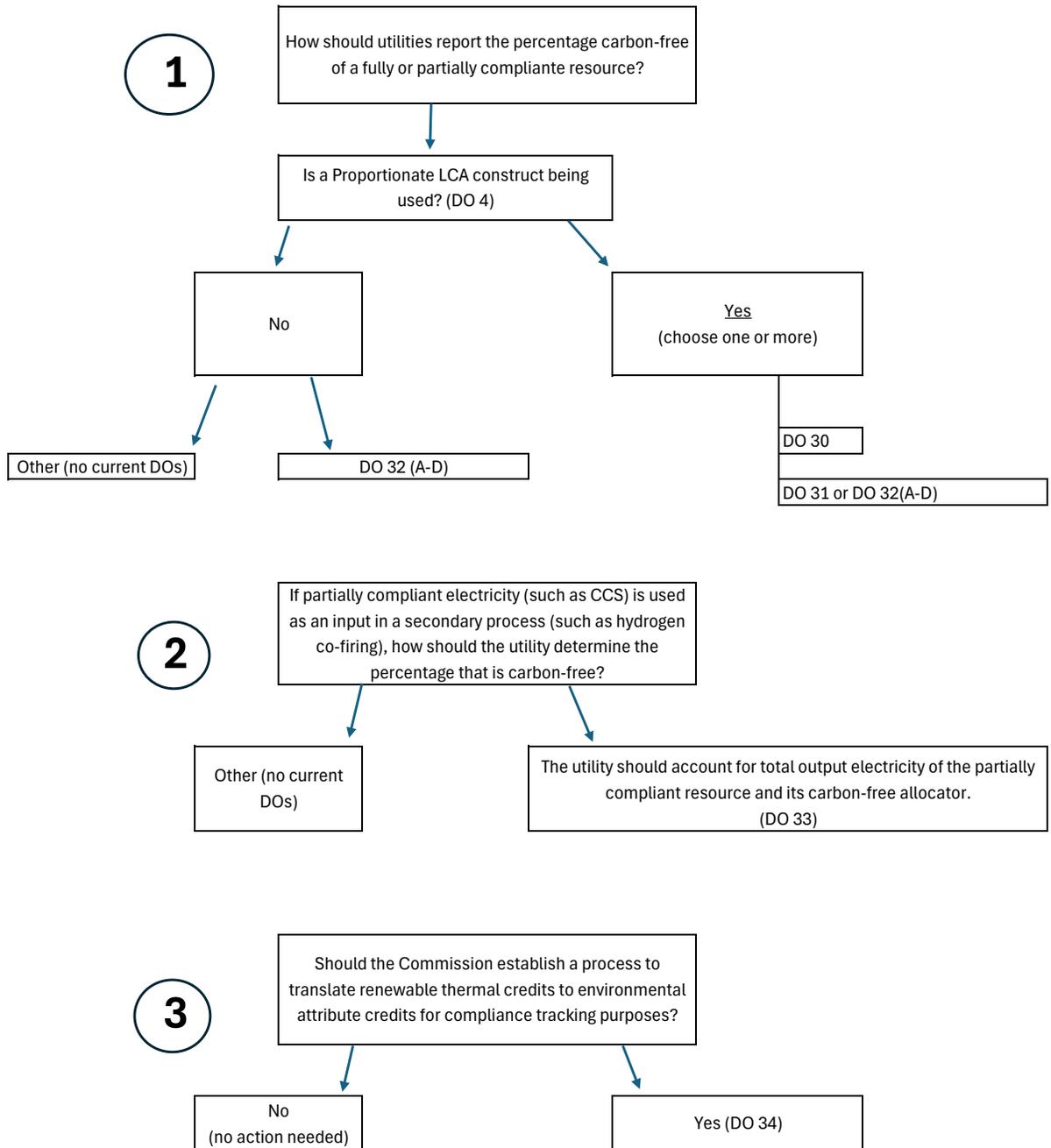
Re-Evaluations (DOs 25-29)

Only decide if LCA framework chosen



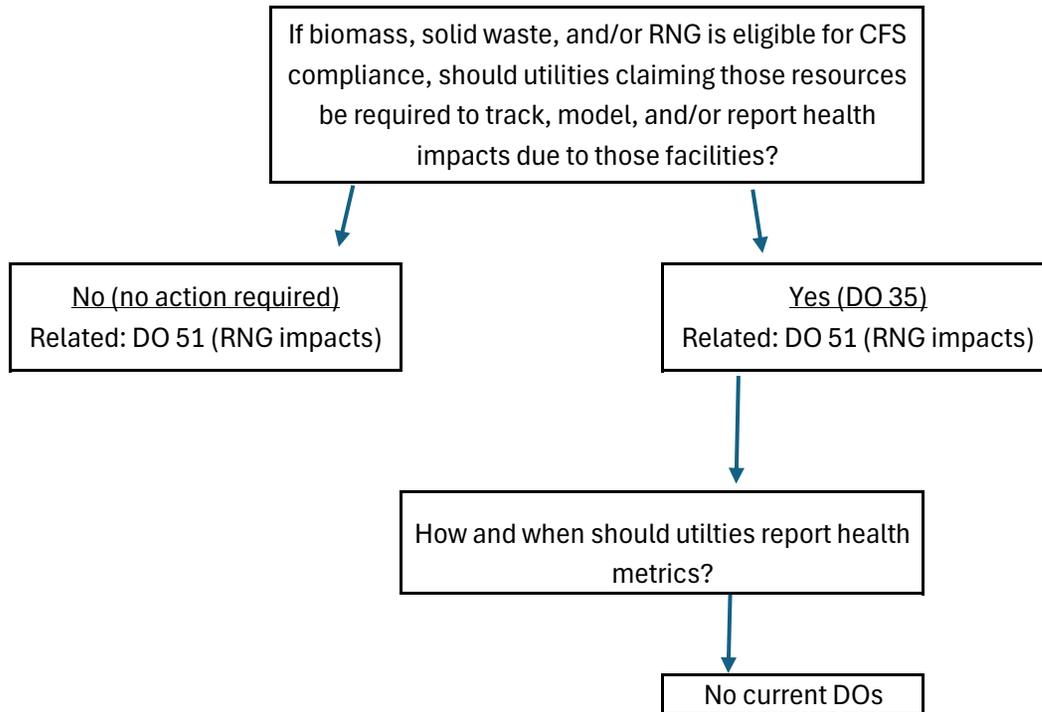
Credits and Allocators (DOs 30-34)

POG, EETs, and LCAs frameworks must decide



Health Metrics (DO 35)

EETs and LCAs frameworks must decide



Compliance Filings (DOs 36-37)

Only decide if LCA framework chosen

1

In addition to current requirements, what should LCA-filing utilities report in their annual CFS compliance filings?
(choose one or more)

DO 36 A

DO 36 B

2

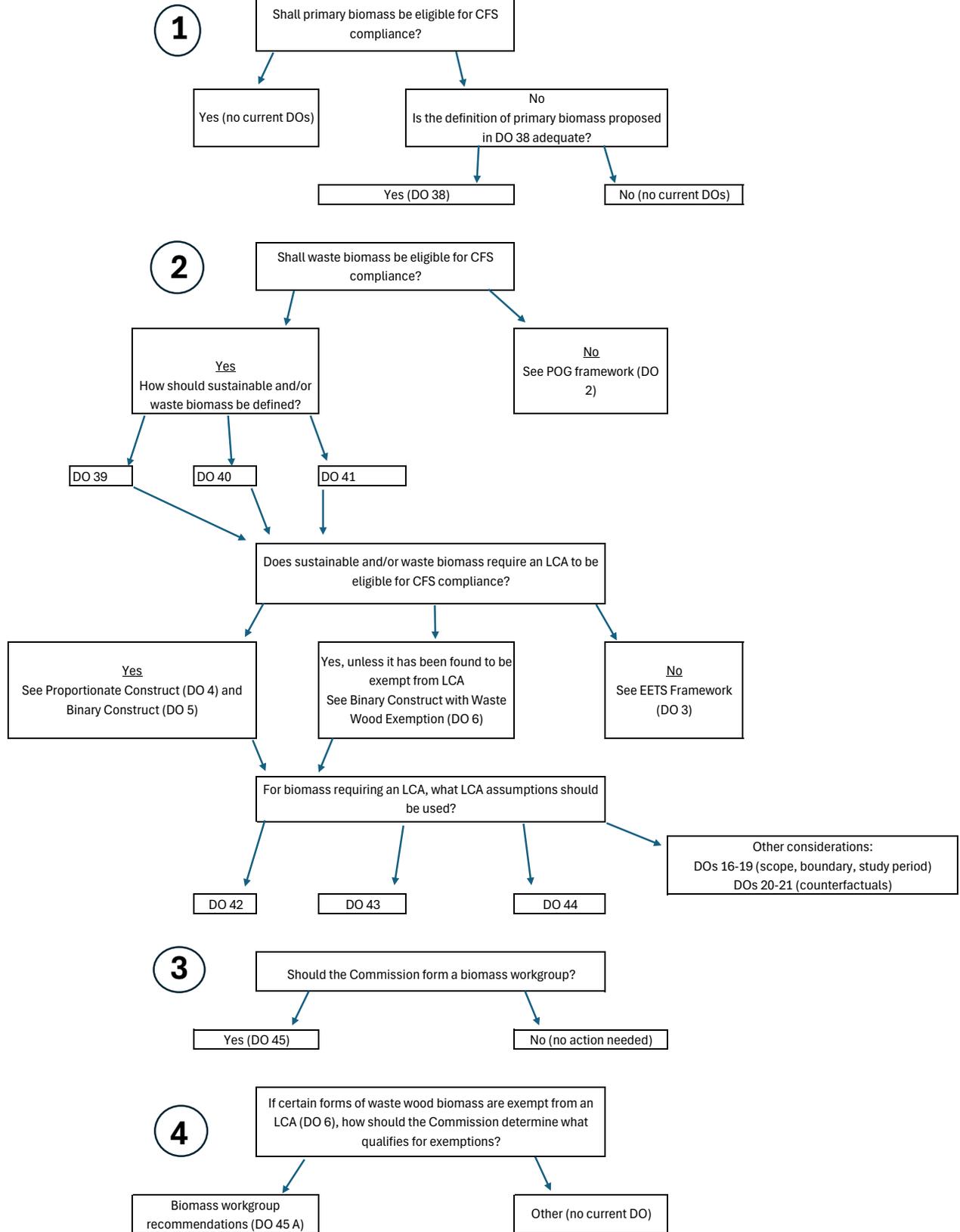
Should utilities intending to use an LCA notify the Commission and offer basic information about the relevant resources/fuel types/sourcing, within 60 days of Order?

Yes (DO 37)

No (no current DOs)

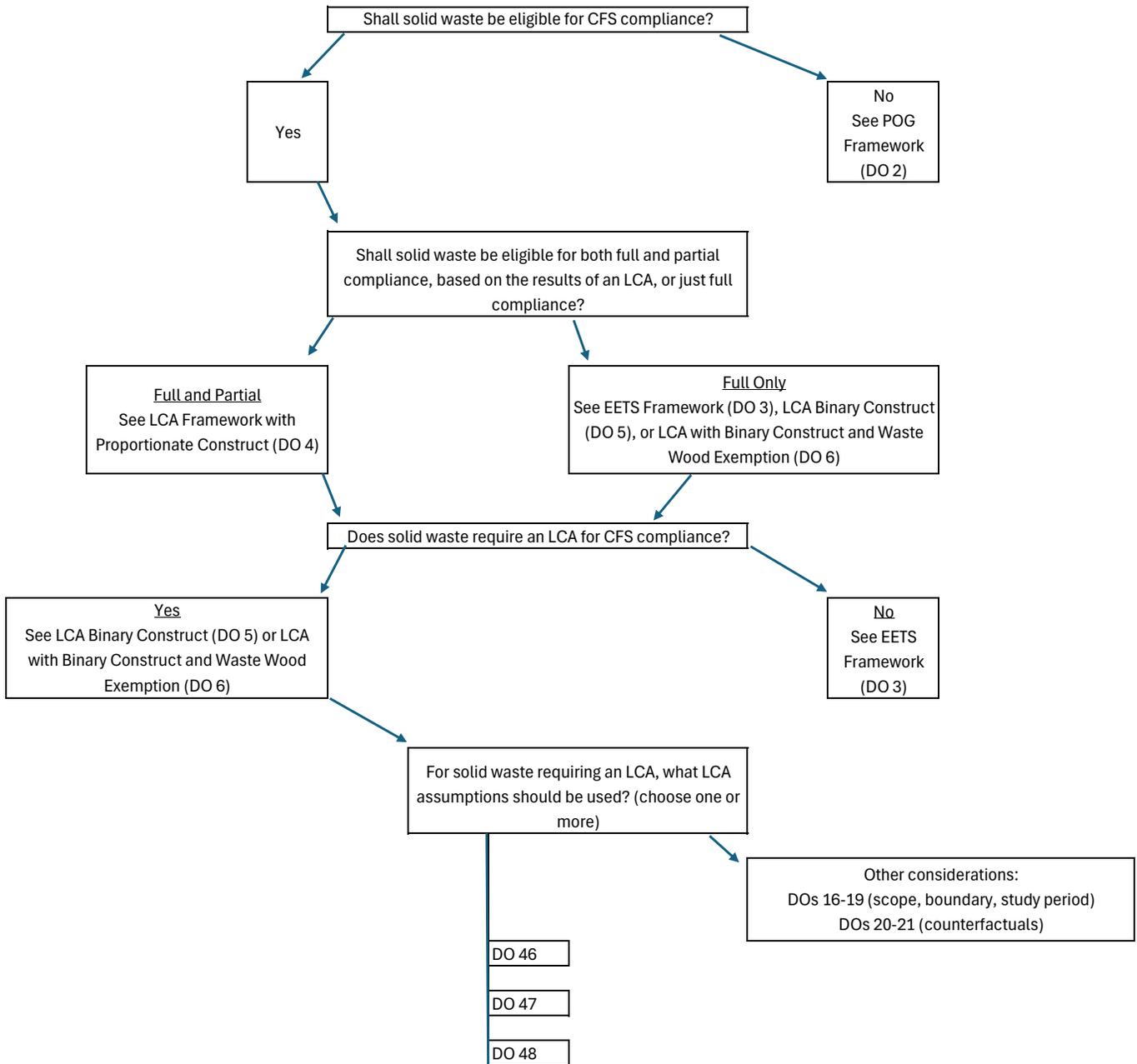
Biomass (DOs 38-45)

Only decide if EETS or LCA framework chosen



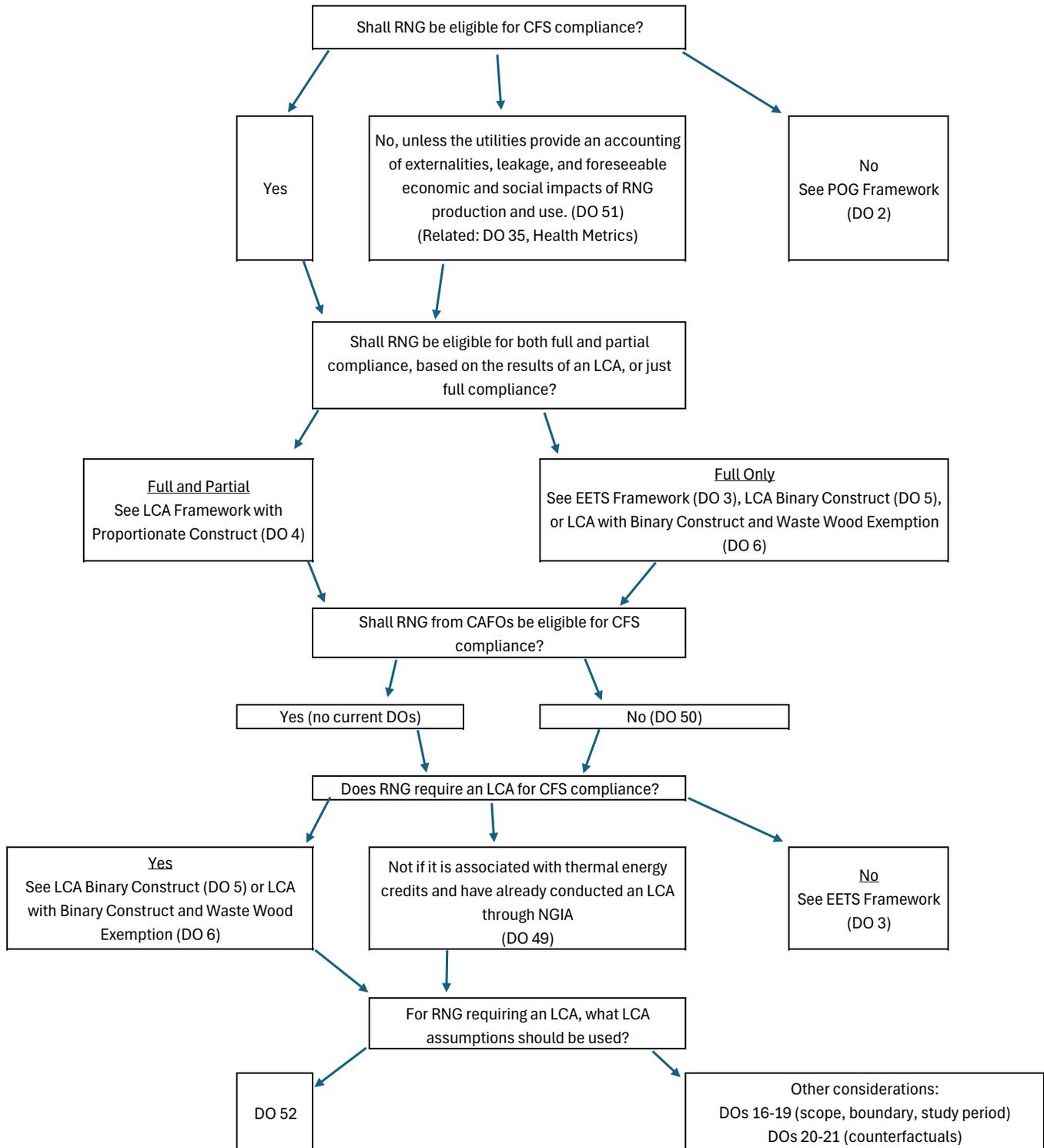
Solid Waste (DOs 46-48)

Only decide if LCA framework chosen



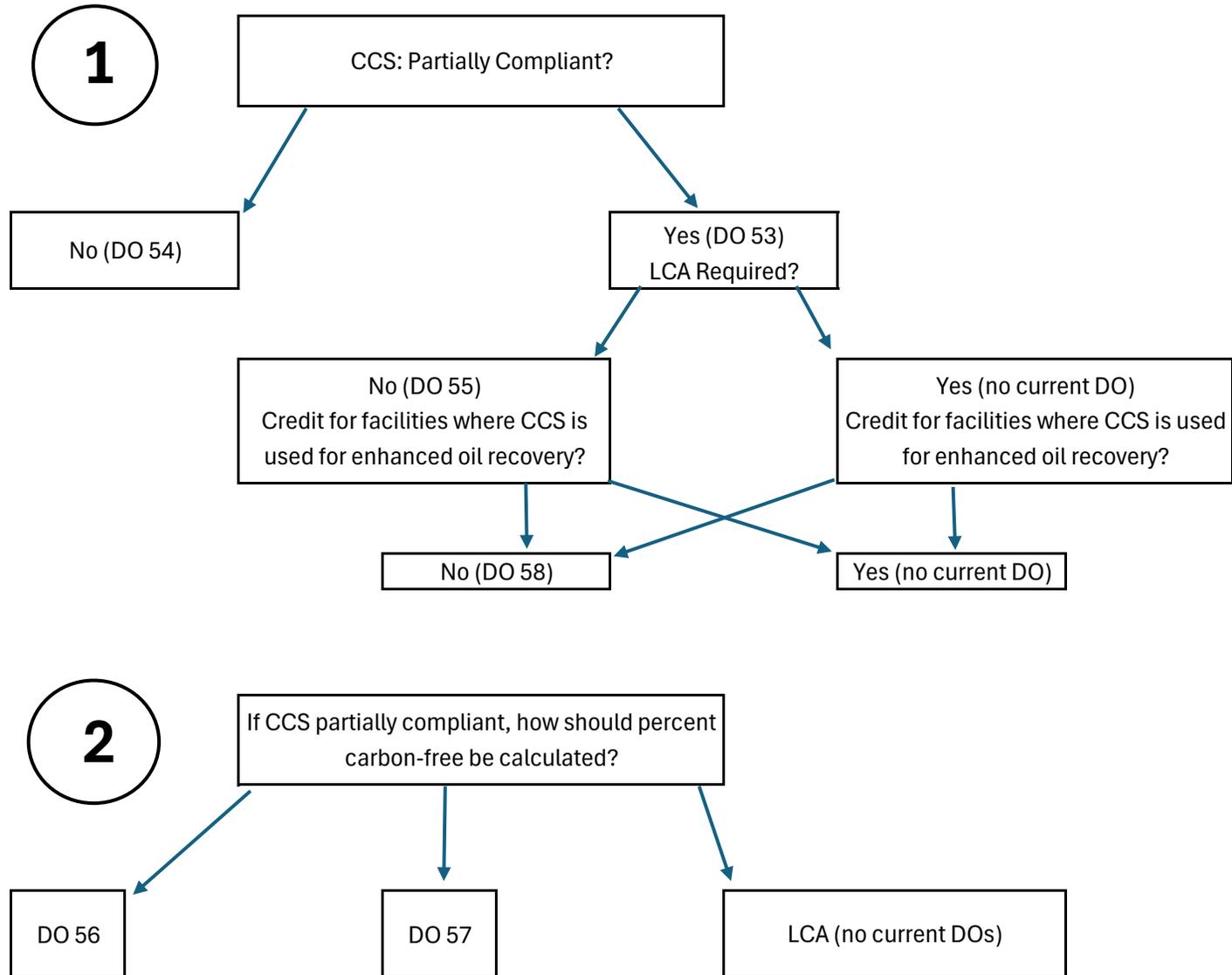
RNG (DOs 49-52)

Only decide if LCA framework chosen



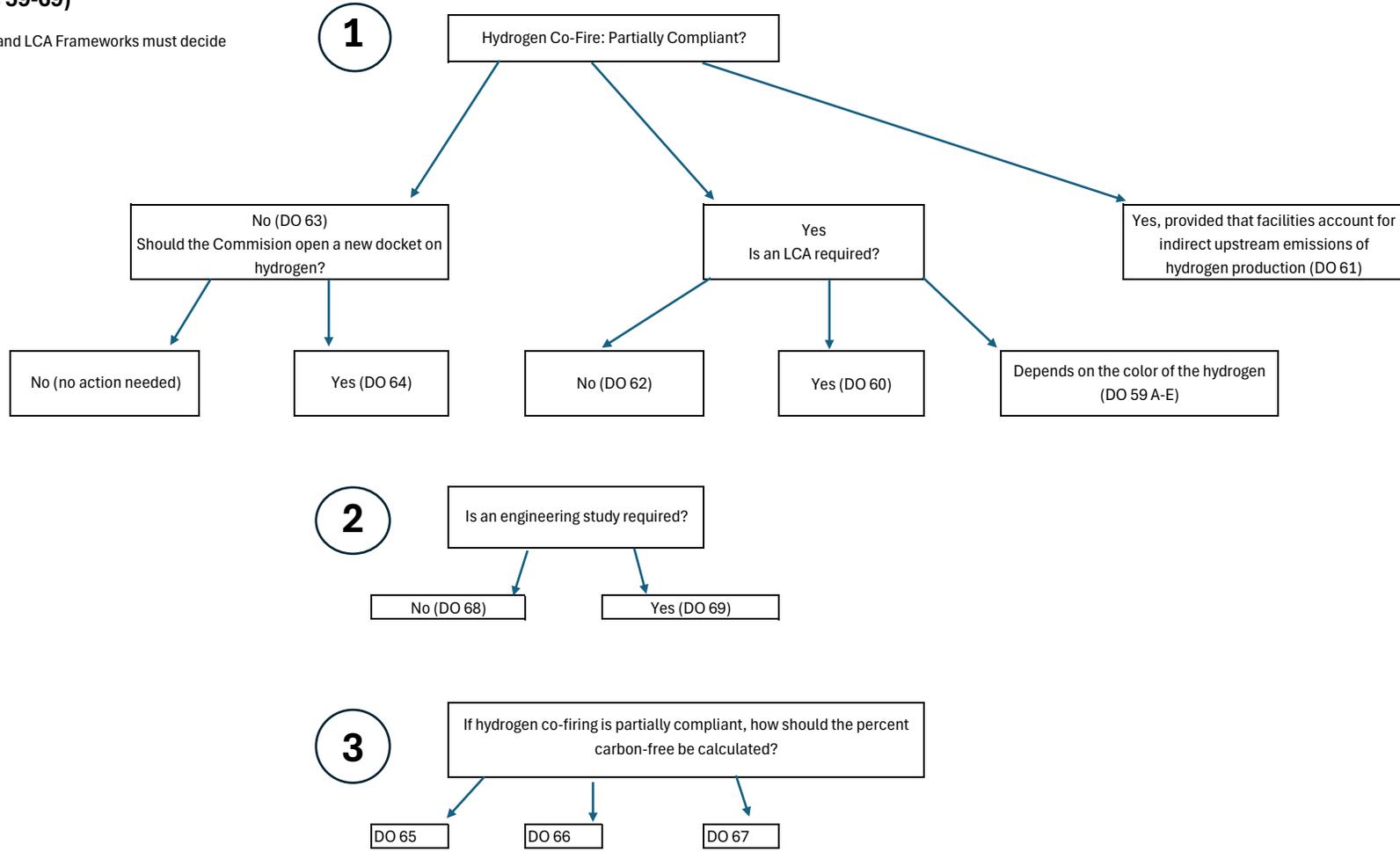
CCS (DOs 53-58)

POG, EETS, and LCA Frameworks must decide



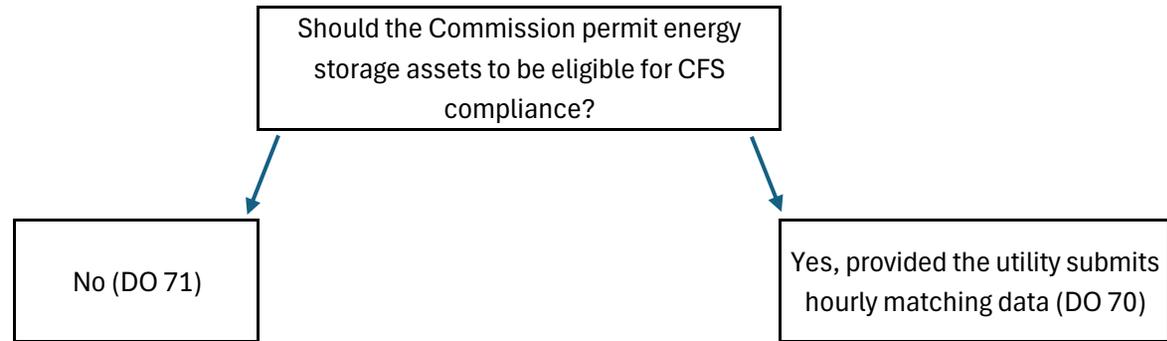
H2 (DOs 59-69)

POG, EETS, and LCA Frameworks must decide



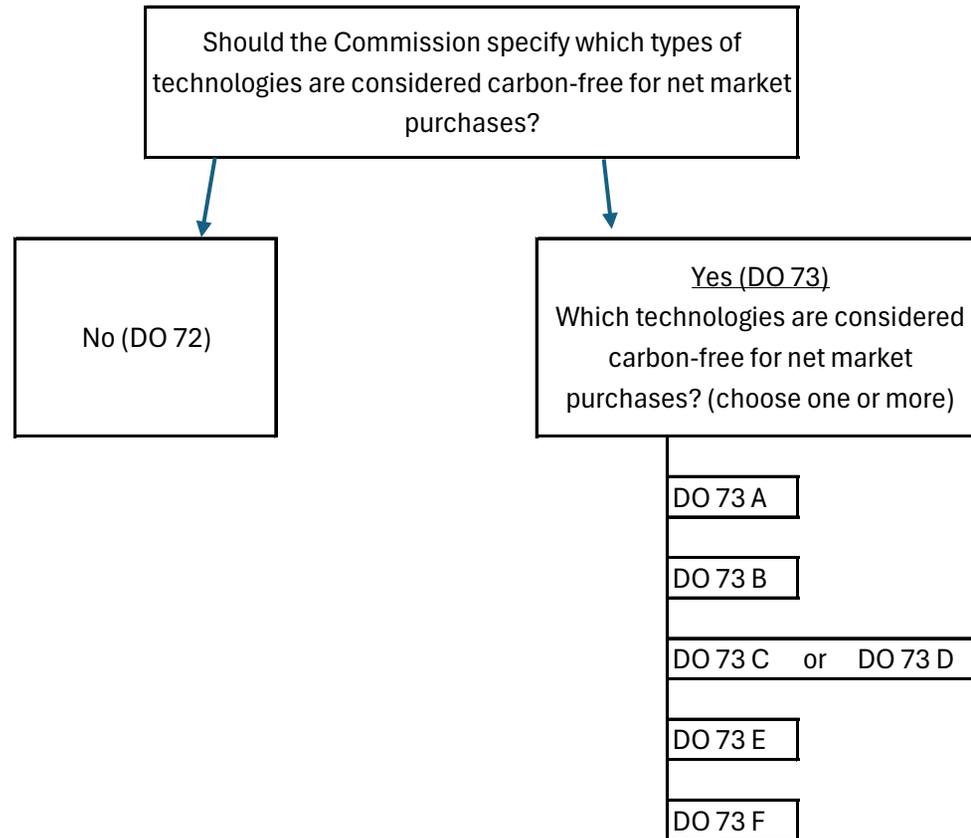
Storage (DOs 70-71)

POG, EETS, and LCA Frameworks must decide



Net Market Purchases (DOs 72-73)

POG, EETS, and LCA Frameworks must decide



Other Resources (DO 74)

Only decide if LCA framework chosen

