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**Subject:** Submitted Public Comment Form  
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Provide the docket's number.	E999/CI-24-352
Leave a comment on the docket. *	Submitted on behalf of the City of Red Wing, Minnesota.
Attach a File	 <a href="#">puc_docket_e999_ci24352_red_wing_comments_6425.pdf</a> 1.08 MB · PDF



June 4, 2025

Consumer Affairs Office  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101

Via e-mail to: [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us)

PUC Docket Number(s): E999/CI-24-352

RE: Eligibility of Refuse Derived Fuel and Biomass Under Minnesota's Carbon-Free Standard

To the Honorable Commissioners:

The City of Red Wing submits the following comments on Docket No. E-999/CI-24-352 regarding the eligibility of Refuse Derived Fuel (RDF) and biomass under Minnesota's Carbon-Free Standard (CFS). Red Wing has a longstanding commitment to environmental stewardship and responsible solid waste management having invested extensive capital resources to build the infrastructure necessary to achieve the legislative policies and goals set forth in the Waste Management Act Minn. Stat. § 115A. We urge the Commission to consider the following points:

#### **Biomass and RDF are Carbon-Free Resources Under Minn. Stat. § 216B.1691**

Minn. Stat. § 216B.1691 explicitly includes biomass as a carbon-free resource. RDF, which is derived from municipal solid waste, qualifies as a form of biomass and should be recognized accordingly. Red Wing has a direct interest in ensuring that this definition is applied consistently, given our regional waste management practices and the critical role RDF plays in reducing landfill dependency. Treating RDF as carbon-free aligns with both the letter and spirit of the statute.

#### **RDF Should Qualify Based on Life-Cycle Greenhouse Gas Benefits**

Even if RDF is not granted full eligibility under the statutory definition, a life-cycle greenhouse gas (GHG) analysis supports its inclusion as a carbon-free resource. RDF facilities reduce methane emissions by diverting organic waste from landfills, where decomposition would otherwise produce potent GHGs. Real carbon reductions occur through the avoidance of methane emissions generated from landfills. By converting waste into energy, RDF eliminates landfill generated methane, displaces fossil-fuel-based electricity generation while recovering recyclable commodities from the waste stream that would not otherwise be captured in a landfill-based system. From a



scientific and policy perspective, the management of waste as RDF and the associative recovery of recyclable commodities yields a net climate benefit when compared to landfilling municipal solid waste.

### **RDF Should Receive Partial Credit for Emissions Reduction Benefits**

Finally, if RDF is not deemed fully carbon-free, the City of Red Wing supports granting partial credit under the Carbon-Free Standard. RDF generation provides a tangible GHG reduction benefit and represents a cleaner alternative to landfilling. Recognizing these relative emissions reductions would support ongoing innovation in waste-to-energy systems, incentivize best practices in waste management, and align with Minnesota's broader climate goals.

### **Conclusion**

Red Wing supports Minnesota's transition to a carbon-free energy future with a full consideration of the direct and measurable benefits RDF production with commodity recovery represent. We believe that policies under the Carbon-Free Standard should be grounded in scientific analysis, reward innovation, and reflect the actual climate impacts of energy resources. RDF and biomass clearly meet these standards.

We respectfully request that the Commission:

1. Confirm that RDF and biomass qualify as carbon-free under Minn. Stat. § 216B.1691.
2. Alternatively, recognize RDF as carbon-free based on life cycle GHG emissions analysis.
3. At minimum, assign RDF partial credit under the CFS due to its GHG reduction benefits relative to landfilling.

Thank you for your time and attention to these comments.

Sincerely,

A handwritten signature in black ink that reads "Jeffrey J. Schneider".

**Jeff Schneider| Deputy Director of Public Works**  
Solid Waste & Recycling Division  
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