



To: Minnesota Public Utilities Commission

Re: PUC Docket Number E002/M-21-590

The Minnesota Department of Agriculture (MDA) is commenting on this issue to express the important role played by District Energy's St Paul Cogeneration Facility in managing wood waste resulting from emerald ash borer (EAB) infestation. EAB was first discovered in Minnesota during 2009 in St Paul, placing the infestation in the middle of the densest concentration of community ash trees in the state.

Minnesota agencies, local units of government, industries, and others worked together to do everything feasibly possible to slow the growth and spread of the EAB infestation and manage the resulting loss of trees. However, the loss of many ash trees was an inevitability. That scenario is currently playing out in the Twin Cities metropolitan area as well as much of southeastern Minnesota and Duluth. Projections created by the MDA in 2022 predicted that the amount of wood being generated from dead and dying ash trees in the Twin Cities metropolitan area would not peak until the late 2020's and not significantly decrease until the mid-2030's.

District Energy's St Paul Cogeneration Facility has been a critical partner in managing EAB infested wood since discovery of the first infestation in St Paul. The facility processes about 260,000 tons of wood material annually. However, even with the large amount of wood being utilized by District Energy we hear regularly from tree care companies that regional wood waste infrastructure is stretched beyond capacity due to EAB.

To lose District Energy as facility for 260,000 tons of wood annually at this time would be catastrophic for management of the EAB infestation in the Twin Cities metro area and would likely have impacts for all of Minnesota. Every piece of EAB-infested wood that does not go into a utilization stream is a piece of wood that can inadvertently carry the infestation to a new area. Currently more than 50 Minnesota counties are infested with EAB and that number is growing rapidly. The MDA has been responsible for managing regulations to prevent the movement of wood to new areas since the first discovery in 2009.

However, with EAB infestations present in so many areas of the state, and so many areas being heavily infested, regulating the movement of wood materials has become less practical. The importance of utilization opportunities has conversely become more important. In the Twin Cities metropolitan area, District Energy is one of the most important utilization options available for EAB infested wood.

A handwritten signature in black ink that reads 'Thom Peterson'.

Thom Peterson
Commissioner, Minnesota Department of Agriculture