

September 10, 2025

Public Utility Commission

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,

I am writing on behalf of the Coalition for Plastic Reduction. We advocate for policy change, promote sustainable practices, and raise awareness about plastic pollution. Thank you for the opportunity to offer comments on the implementation of the 100% Carbon-Free Standard law.

We applaud the Minnesota legislature for passing the 100% clean electricity bill that will commit all utilities to provide Minnesotans with 100 percent carbon-free electricity by 2040. This is in alignment with climate science and technology advancements and will result in reduced greenhouse gas emissions and a healthier environment.

Burning woody biomass and garbage should not be considered carbon-free, nor be considered for partial credit. They both directly emit more greenhouse gases than burning coal and, also emit serious pollutants that impact our health, especially for nearby, and often overburdened, communities.

Including trash incineration as carbon-free also goes against another provision passed by the legislature in 2023¹ asking for recommendations meant to reduce the amount of materials disposed of in landfills or incinerators statewide by 90% by 2045. Granting carbon-free status to incineration, could result in carbon credits that would incentivize creating more solid waste rather than less. To meet this new goal, we need to focus on policy, system changes, and investment in alternatives that are all needed to reduce and avoid waste generation.

We urge you not to weaken the 100% carbon-free law by allowing false climate solutions to qualify as carbon-free. The law is clear that carbon-free means a technology that generates electricity without emitting carbon dioxide.

Thank you for considering our comments.

Sincerely,
Lori Olinger
Coalition for Plastic Reduction

¹ HF2310 Article 3; Section 35; RESOURCE MANAGEMENT; REPORT (2023)