

March 19, 2025

Consumer Affairs Office
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul MN 55101

Re: In the Matter of an Investigation into Implementing Changes to the Renewable Energy Standard and the Newly Created Carbon Free Standard under Minn. Stat. § 216B.1691, Docket No. E-999/CI-23-151 (reply comments)

Dear Members of the Public Utilities Commission,

The Partnership on Waste and Energy (Partnership) is a Joint Powers Board consisting of Hennepin, Ramsey and Washington counties, formed to address waste management and energy issues. The Partnership seeks to end waste, promote renewable energy and enhance the health and resiliency of the communities we serve while advancing equity and responding to the challenges of a changing climate.

The Partnership appreciates the opportunity to submit reply comments as the Commission considers clarifications regarding carbon-free standard compliance reporting and verification under Minn. Stat. § 216B.1691, per the Notice of Comment Period issued October 31, 2024.

The Partnership agrees with the Department of Commerce's Division of Energy Resources (DOC DER) that the final full or partial eligibility status of, and amount of credit for, waste biomass, refuse-derived fuel, and primary biomass generation is planned to be determined in docket 24-352.¹ In fact, the questions included in the Commission's Notice of Comment Period issued January 22, 2024 in that docket reflect this purpose. The Partnership agrees with the Department's statement that "[a]ny attempts to set criteria and standards in this proceeding would preclude intervenors in Docket No. E-999/CI-24-352 from fully discussing the merits of different methodologies for the measurement of partial compliance, particularly in the context of fuel life-cycle assessment."²

Accordingly, in response to positions some have made in the third round of comments in docket 23-151 that these technologies should now be rendered ineligible, the Partnership respectfully submits that the appropriate time and forum for decisions on eligibility is in docket 24-352.

The Partnership reiterates its encouragement in its reply comments submitted July 24, 2024 that the Commission proceed in a way that solves for the challenges of examining all resources and generation processes under consideration. A whole-systems approach is needed to cohesively arrive at solutions that produce overall optimum protection for the environment and the climate.

¹ Department of Commerce, Division of Energy Resources letter of January 29, 2025, page 14.

² Department of Commerce, Division of Energy Resources letter of January 29, 2025, page 21.

The Partnership also reiterates its earlier comment supporting an energy system that includes the full range of technologies enabling solutions to multiple policy goals, including the nexus between climate, waste and energy policy, and encourages the Commission's decisions sustain such an energy system as it makes its decisions regarding the Renewable Energy Standard and the newly created carbon-free standard under Minn. Stat. §216B.1691.

Thank you for the opportunity to provide comments in these important deliberations.

Sincerely,

A handwritten signature in black ink, appearing to read "Fran Miron", is written over a light gray rectangular background.

Commissioner Fran Miron, Washington County
Chair, Partnership on Waste and Energy

cc: Commissioner Debbie Goettel, Hennepin County
Commissioner Mary Jo McGuire, Ramsey County