



September 17, 2025

Sasha Bergman

Executive Secretary

VIA E-FILING

Minnesota Public Utilities Commission

121 7th Place East Suite 350

St. Paul, MN 55101-2147

RE: In the Matter of a Commission Investigation into  
a Fuel Life-Cycle Analysis Framework for Utility  
Compliance with Minnesota's Carbon-Free  
Standard; PUC Docket No. E999/24-352

Dear Executive Secretary Bergman,

The Minnesota Resource Recovery Association (MRRA) submits this supplemental comment letter for the Minnesota Public Utilities Commission's Docket E999/24-352 In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard (CFS).

Minnesota Resource Recovery Association members are key to statewide waste management. Our facilities operate primarily in greater MN counties (Blue Earth, Olmsted, Otter Tail, Polk, Pope, Douglas, Goodhue) as well as the metro counties of Washington and Hennepin. Many member waste to energy (WTE) facilities have significant roles within the counties, either directly or through joint powers agreements. They provide waste management solutions for the counties they operate in and surrounding areas. Members from this association process more than 1,000,000 tons of waste generated from more than 30 Minnesota counties each year.

In Minn. Stat. § 216B.1691 biomass, including "an energy recovery facility used to

capture the heat value of mixed municipal solid waste (MSW) or refuse-derived fuel (RDF) from mixed municipal solid waste as a primary fuel”, is identified as an eligible energy technology (EET) that produces renewable energy credits that can be used to satisfy the Carbon-free Standard located in subdivision 2g<sup>1</sup>.

In addition to waste-to-energy from MSW and RDF being identified as an EET, multiple reports conclude that the “net” carbon footprint of resource recovery is less than half that of landfilling.<sup>2</sup> In the event the Minnesota Public Utilities Commission determines that a life cycle analysis is needed, waste to energy from MSW and RDF should receive full credit towards CFS compliance.

### **Conclusion**

MRRA appreciates the opportunity to submit a supplemental reply comment on this matter and looks forward to the opportunity to testify in front of the Minnesota Public Utility Commission. Please contact me at [steve@popedouglasrecycle.com](mailto:steve@popedouglasrecycle.com) or 320-763-9340 if you have any questions.

Sincerely,



Steve Vrchota  
Chair, MRRA

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<sup>1</sup> <https://www.revisor.mn.gov/statutes/cite/216b.1691>

<sup>2</sup> Net carbon footprint of resource recovery and landfilling

- a. Comments of the MPCA on Docket No. E999/CI-23-151, June 28, 2024, Frank Kohlasch and Kirk Koudelka.
- b. LifeCycle Assessment of the Climate Impacts of Municipal Solid Waste Diverted from Landfill to Reword Thermomechanical Treatment Facility, September 2024, Shanee Halevi, William Flood, Jyoti Agarwal and Michael Van Brunt, Reworld.