

Technology / Feedstock	Definition	Eligible for CFS Compliance? (Y/N/Other )	Method of GHG Quantification (Specify Model or Generic Method)**	LCA Study Period (Yrs)	Baseline	Partial EACs Awarded?	0 EAC Cutoff
Waste to Energy - landfill gas facilities, municipal solid waste, and renewable natural gas	CMPAS agrees with definition proposed by MN DOC and MPC in Initial Comments (Energy derived from solid waste as defined by Minn. Stat. 116.06 subd. 22)	Other*	US DOE GREET and EPA LandGEM	The study period should align with the beneficial use program. See CMPAS Reply Comments starting on page 4.	<i>The phrase "landfilling" included in the MN DOC and broad. Suggested baseline of "worst case MSW landfill".</i>	No strong opinion; open to this concept	Higher emissions than alternative waste management emissions.
Storage	Any technology that is not a generator but which stores electricity generation to discharge at a later time.	No	Does not matter; not eligible.	Does not matter; not eligible.	Does not matter; not eligible.	Does not matter; not eligible.	Does not matter; not eligible.
Biomass (Waste & Primary)	CMPAS agrees with the definitions proposed by MN DOC and MPC in Initial Comments.	Other*	No Comment	No Comment	No Comment	No Comment	No Comment

Any technology or feedstock not included in the Attachment A for CMPAS simply means that CMPAS has no comment at this time.

\*Eligibility must be consistent for all technologies/feedstocks with this asterisk. By this, CMPAS mean that if the Commission decides to offer or allow a potential pathway for one technology/feedstock to be used for CFS compliance, CMPAS believes it must be a potential pathway for all of these technologies/feedstocks, in order to ensure consistency for all resource types.

\*\*CMPAS believes that statute only requires quantification of carbon emissions, not other greenhouse gas emissions. In its Reply Comments, CMPAS requests clarification from the MN DOC and MPC as to whether the intent of including all types GHG emissions is to convert them to CO<sub>2</sub>e, or whether the intent is to keep all types of GHG emissions disparate.