



Batch E-Filing for Docket 24-352

1. Daniel Engelhart
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9. Evie Ebel
10. John Dunlop comment 2
11. Claire Lienesch (née Fromme)

From: danielengelhart@everyactioncustom.com on behalf of [Daniel Engelhart](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Minnesotans need 100% Carbon Free Energy to be Clean & Renewable [Docket #: 24-352]
Date: Thursday, September 18, 2025 8:15:28 AM

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Dear Minnesota Public Utilities Commission,

Thank you for the opportunity to weigh in on the question of what “carbon-free” electric energy means in Minnesota. The decisions and governance frameworks we put in place now for the energy transition will reverberate decades into the future. It is your duty to hold the line and make sure that the definition of “carbon free” is not watered down, harming Minnesota communities, the climate, and our future innovative society.

Will Minnesota’s “carbon-free” future live up to its legislative intent—an energy system that is truly clean, healthy, and equitable, which allows all our communities to thrive? Or will it be a vehicle for monopoly utilities and powerful polluting industries to advance a range of false solutions that pad their bottom lines at the expense of our communities and ecosystems?

As you wrestle with these questions, it's critical that you listen to the full range of voices who will be impacted by your decisions. I am very concerned to see that this comment period around the definition of “carbon free” has become a forum for polluting and extractive industry to push a wide range of their pet false solutions.

The Commission should not entertain a life cycle analysis that is contrary to the law and clear guidance from the legislature. Engaging in this analysis is a complicated and frivolous waste of time that could be better spent establishing clear paths to compliance for our utilities.

I ask that PUC reject the following false solution boondoggles for inclusion in the definition of “carbon free” technologies:

- Costly, inefficient, and polluting technologies that emit carbon when electricity is generated like burning wood and garbage for energy.
- Carbon Capture and Sequestration, the fossil fuel industry's favorite taxpayer-funded scheme to delay the transition to real decarbonization.
- Dirty hydrogen generated from methane provided and processed by the gas industry.

I further demand that the PUC prioritize the following considerations in Minnesota's definition of carbon-free energy:

- Recognize the urgent need to halt the expansion of fossil fuel resources.
- Recognize that anything that burns fuel which emits carbon cannot be “carbon-free” under the 100 percent standard.
- Only include technologies or methods that result in real-zero emissions, such as solar and wind energy.
- Not support and incentivize the continued use of fossil fuels or increase fossil fuel infrastructure, either directly or indirectly (e.g., burning consumer trash, which contains significant amounts of plastics and other carbon-heavy material, hydrogen blending with gas burning for “partial compliance,” or CCS, which is used to extract more oil).
- Align with plans for a just transition for fossil fuel and extractive-dependent communities.
- End the environmental injustice and racism that impose pollution costs on poorer communities to serve electricity

to wealthy individuals and industries.

We have a window of opportunity for Minnesota to be a leader in building an energy system that recognizes that no communities are expendable and where we invest in and plan for the drawdown of fossil fuels and other carbon-intensive energy production, use, and infrastructure.

Sincerely,

Daniel Engelhart

Minneapolis, MN 55418-4418

danielengelhart@gmail.com

From: amanda.kieval@everyactioncustom.com on behalf of [Amanda Kieval](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Minnesotans need 100% Carbon Free Energy to be Clean & Renewable [Docket #: 24-352]
Date: Thursday, September 18, 2025 8:15:31 AM

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Dear Minnesota Public Utilities Commission,

I moved here recently from Texas for the state's beauty, better governance, and more progressive values. Minnesota is a beautiful place that I love, and I want to see it continue down a path of future-proofing its electric system, while protecting people and the environment.

Thank you for the opportunity to weigh in on the question of what "carbon-free" electric energy means in Minnesota. The decisions and governance frameworks we put in place now for the energy transition will reverberate decades into the future. It is your duty to hold the line and make sure that the definition of "carbon free" is not watered down, harming Minnesota communities, the climate, and our future innovative society.

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- End the environmental injustice and racism that impose pollution costs on poorer communities to serve electricity to wealthy individuals and industries.

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Sincerely,
Amanda Kieval
Minneapolis, MN 55418-4500
amanda.kieval@gmail.com

From: [Tess Dornfeld](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Carbon-free means carbon-free: Docket #24-352 public comment
Date: Wednesday, September 17, 2025 4:32:42 PM

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Burning wood waste and burning garbage both emit carbon dioxide, as does any technology that relies on carbon capture - that should be the end of the discussion. The language of the law is clear, carbon-free means a technology that generates electricity without emitting carbon dioxide.

Not only are waste and biomass incineration not that, they generate more carbon emissions than burning coal. And carbon capture plainly does not qualify either, it's right in the name - no capture would be needed if no carbon dioxide were emitted.

Lifecycle analyses would essentially turn the “carbon free” standard into a much weaker “carbon neutral” standard. The law itself does not permit the use of these processes for determining whether a technology is carbon-free

Pursuing these analyses further is a waste of the valuable time and resources of the PUC and the public.

From: [Sydney](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Regarding Docket Number 24-352
Date: Wednesday, September 17, 2025 3:56:52 PM

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My name is Sydney and I am a Minnesota resident.

I'm writing to express my opposition to docket number 24-352's mislabeling of biomass, natural gas, and trash burning as "carbon free." These methods have been shown to have a greater negative environmental impact than coal and gas. As an alternative, lawmakers should continue to support and invest in renewable energy sources to maintain Minnesota's precedent of carbon neutrality goals. Minnesota is a national leader in terms of carbon neutrality goals. That's an achievement to be proud of, and I and many others want to keep it that way.

I understand that the motivation behind changing these definitions is to attract revenue in the form of AI data centers. AI data centers have already been shown to monopolize power grids, driving up prices, depleting local water tables, and introducing harmful air and light pollution. I strongly oppose these mislabelings particularly in this light.

Thank you for your consideration.

Sydney

From: [Angela Schneider-Doheny](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Concerns over Docket Number 24-352
Date: Wednesday, September 17, 2025 3:38:53 PM

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To Whom it May Concern,

My name is Angela Doheny and I live in Saint Paul, Minnesota. I'm reaching out to share that I oppose biomass, "renewable" natural gas, or trash burning being *incorrectly* labeled as "carbon free" in docket # 24-352. Emissions from this type of burning are concerning enough, but is compounded by the ramifications that can come from it combined with AI data centers, which are known energy vortexes that stick the residents around them with huge bills and fewer resources.

Please do the right thing for the residents and our collective futures and stick to the legitimately won carbon neutrality goals our state set years ago.

Best,

Angela Doheny
1743 Blair Ave, Saint Paul MN 55104

From: [John Dunlop](#)
To: [Staff, CAO \(PUC\)](#)
Subject: PUC Docket Number(s): E-999/CI-24-352
Date: Wednesday, September 17, 2025 3:19:16 PM

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(Please use this version with two technical modifications)

Docket: 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 Number(s): E-999/CI-24-352

Submitted by:

John Dunlop, P.E., Principal
Renewable Energy Services

Comment:

The legislation is perfectly clear: Carbon free technologies are those that do NOT produce CO₂ emissions while generating electricity.

The term, “partial compliance,” is also perfectly clear: If a carbon free technology is used in combination with a carbon-emitting technology *while generating electricity*, only the portion of the electricity produced by the carbon-free technology can be counted toward meeting the 100% Carbon Free Standard.

Technologies that emit carbon *while generating electricity* are NOT carbon free – regardless how recently carbon may have been captured in creating the fuel (months or megaannum) or whether a portion of the emitted carbon may subsequently be diverted to a storage system, where it will remain a risk of being emitted into the atmosphere.

The Public Utilities Commission was created to implement state laws – NOT reinterpret them. The Commission must implement the 100% Carbon Free Standard as written.

John Dunlop, P.E.

Renewable Energy Services LLC

JDunlop@RESMinn.com email

+01-651-695-6480 office

+01-612-590-5538 cell

Providing technical and policy support for climate action

From: [stitched raven](#)
To: [Staff, CAO \(PUC\)](#)
Subject: docket 24-352
Date: Wednesday, September 17, 2025 2:43:22 PM

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I, Tailltiu Langford, resident of Minnesota, am writing in about docket 24-352.

I am against to any interpretation of the 100% Carbon Free Standard that classifies sources like burning wood waste or garbage as good as carbon free. 100% carbon free should be 100% carbon free, and not only do these alternate sources produce carbon, but also create other hazardous emissions through burning, like volatile organic compounds, particulate matter, and heavy metals. These pollutants greatly harm the communities that these burning sites are placed near and cause chronic illness, suffering, and early death.

Spending our time and resources on lifecycle analyses for these energy sources is a waste when we already know they have these dangerous downsides and they don't meet the existing definition for 100% carbon free. Minnesota has been leading the way on climate with our 100% carbon free standard and we shouldn't walk that back for anything. Our communities deserve clean air and honest, straight-forward legislation.

From: [Tadhg Langford](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Docket 24-352
Date: Wednesday, September 17, 2025 2:53:39 PM

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I'm Tadhg Langford, a minnesotan who has lived in this state for my entire life. This is what I think about docket 24-352.

Including burning woody biomass, garbage, and renewable natural gasses in a zero carbon standard would be a grave failure.

We deserve clean air and stuff like burning woody biomass, garbage, and renewable natural gasses would only pollute the very air we breathe.

Carbon free should mean NO carbon from creating energy, not net zero.

We should focus on clean technologies that will help us build a more beautiful Minnesota where blue skies are the norm and the only haze is a foggy day.

Minnesota should be at the forefront of the future and taking the lead on true zero carbon energy should be a key part of that effort.

From: [carrie langford](#)
To: [Staff, CAO \(PUC\)](#)
Subject: docket number 24-352
Date: Wednesday, September 17, 2025 1:47:45 PM

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As proposed in docket number 24-352 I am opposed to reclassifying biomass as a carbon free renewable energy source. Minnesota has done a good job working toward renewable and clean energy it would be bad to ruin that over the potential for data centers and also it is not clean energy.

We value our air and environment here.

Evie Ebel
Minnesota resident

From: [John Dunlop](#)
To: [Staff, CAO \(PUC\)](#)
Subject: PUC Docket Number(s): E-999/CI-24-352
Date: Wednesday, September 17, 2025 1:45:00 PM

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Docket: In the Matter of a Commission Investigation into a Fuel Life-Cycle Analysis Framework for Utility Compliance with Minnesota's Carbon-Free Standard

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Renewable Energy Services

Comment:

The legislation is perfectly clear: Carbon free technologies are those that do NOT produce CO₂ emissions while generating electricity.

The term, “partial compliance,” is also perfectly clear: If a carbon free technology is used in combination with a carbon-emitting technology *while generating electricity*, only the portion of the electricity produced by the carbon-free technology can be counted toward meeting the 100% clean energy law.

Technologies that emit carbon *while generating electricity* are NOT carbon free – regardless how recently carbon may have been captured in creating the fuel (months or megaannum) or whether a portion of the emitted carbon may subsequently be diverted to a storage system, where it will remain a risk of being emitted into the atmosphere.

The Public Utilities Commission was created to implement state laws – NOT reinterpret them. The Commission must implement the 100% clean energy law as written.

John Dunlop, P.E.

Renewable Energy Services LLC

JDunlop@RESMinn.com email

+01-651-695-6480 office

+01-612-590-5538 cell

Providing technical and policy support for climate action

From: [Claire Lienesch](#)
To: [Staff, CAO \(PUC\)](#)
Subject: Opposing docket #24-352
Date: Wednesday, September 17, 2025 10:48:15 AM

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My name is Claire Lienesch and I live in Ramsey County, Minnesota. I VEHMENTLY oppose biomass, "renewable" natural gas, or trash burning being *incorrectly* labeled as "carbon free". This is a trick and a lie! I want law makers to actually stick to the very popular and legitimately won carbon neutrality goals our state set years ago. That is why I am opposing docket #24-352.

Nobody wants \$600 energy bills, laws that lie, and law makers ignoring the popular mandates so many people worked so hard for!

Sooner than later we will have an economy built around clean energy, and I want Minnesota to lead the way on that, not take steps backward.

Claire Lienesch (née Fromme)
651-497-5462
fromme.cl@gmail.com