

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

**Supplemental Comments of LIUNA Minnesota and North Dakota**

**PUC Docket Number: E-999/CI-24-352**

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to offer supplemental comments on Minnesota Public Utilities Commission (“Commission”) implementation of new renewable energy and carbon-free standards with a specific focus on Life Cycle Analysis (“LCA”) and other technical questions related to the calculation of partial credits under the applicable statute.

LIUNA strongly supports the use of LCA as a tool to determine the extent to which alternative fuels such as biomass, hydrogen, renewable natural gas should be considered to be fully or partially “carbon-free” based on their net impacts on greenhouse gas emissions (“GHGs”). We generally agree with initial comments filed by the Minnesota Department of Commerce (“DoC”) and Minnesota Pollution Control Agency (“PCA”) laying out the generally accepted definition of LCA and the state’s definition of sustainable biomass. We also agree with the straightforward method for calculating the carbon-free portion of generation from a facility equipped with carbon capture technology proposed in the agencies’ initial comments.

We likewise generally agree with comments filed by Connexus, Great River Energy, Minnesota Power, Xcel Energy, the Partnership on Waste & Energy, and the American Forest & Paper Association which propose reasonable frameworks for implementation of LCA and calculation of partial credit for partially carbon-free resources. We are frankly disappointed, on the other hand, that a number of other commenters in this proceeding have devoted much of their efforts to re-litigating the past proceeding in which the Commission decided to move forward with development of LCA for consideration of fuels such as biomass, hydrogen and RNG. Rather than repeat all of the arguments made by LIUNA in the 23-151 docket, we would incorporate them by reference and once again point out, first, that such alternatives were clearly contemplated during passage of the law; and second, that an overly narrow interpretation of the statute inevitably leads to the absurd result of considering a net-zero biomass plant to be a fully carbon-emitting resource, while “gray” hydrogen produced through steam reformation must be considered a fully carbon-free resource.

We thank the Commission for its consideration.

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Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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