



July 14, 2025

Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, #350
Saint Paul, MN 55101

**Support of or Opposition to Proposed Decision Options
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**

PUC Docket Number: E-999/CI-23-151

In the above matter, Center for Resource Solutions (CRS) reiterates the need to use contractual instruments to accurately track the attributes of carbon-free electricity delivered over a bulk power transmission grid, and that their retirement is necessary to prevent double-counting, protect an exclusive claim to the attributes and associated emissions, and ensure that voluntary purchases are surplus to regulation.

Decision Option 1. – *CRS Supports*

Partridge Modification: *CRS Opposes.* Removing the requirement to retire RECs to demonstrate compliance using generation directly owned by the utility or purchased through a PPA invites double counting and undermines regulatory surplus by permitting utilities to sell the associated RECs it derives from power whose attributes have already been used to demonstrate compliance with the CFS.

Decision Option 2. – *CRS Opposes*

Decision Options 3, 4, 5. – *CRS Has No Position*

Decision Option 6. – *CRS Supports*

Decision Option 7. – *CRS Opposes*

Partridge Modification – 7A: *CRS Opposes*

Decision Options 8, 9, 10. – *CRS Has No Position*

Decision Option 11. – *CRS Supports*

Partridge Modification – *CRS Opposes*

Decision Option 12. – *CRS Supports*

Decision Option 13. – *CRS Has No Position*

Decision Option 14. – *CRS Has No Position*

Staff Modification: *CRS Has No Position*

Decision Options 15, 16, 17, 18, 19. – *CRS Has No Position*

Decision Options 20, 21. – *CRS Has No Position*

Partridge Modification – 21A: *CRS Has No Position*

Decision Option 22. – *CRS Supports*

Decision Option 23. – *CRS Opposes*

Decision Option 24. – *CRS Supports*

Decision Option 25. – *CRS Supports*

Decision Option 26. – *CRS Opposes*

Decision Option 27. – *CRS Supports*

NOTE: CRS noted with interest Staff’s suggestion that, “should the Commission wish to pursue some form of residual mix accounting, it might consider a hybrid approach by requiring utilities to use an average market fuel mix, but remove generation associated with their own EAC claims. Utilities would more readily have access to this data, and this would address the Department’s concern mentioned earlier that “if an electric utility claims net market purchases of the fuel mix for CFS compliance, it would be claiming a fraction of its own carbon-free generation, unless this generation is subtracted from the fuel mix.”

Although Staff did not include a corresponding decision option, CRS wishes to express its opposition to the suggested hybrid approach. The suggested approach may avoid a utility double-claiming its own carbon-free generation, but the resulting resource mix would still contain all the specified generation whose attributes were sold separately from the energy and are the exclusive property of the voluntary purchaser. By applying the resulting resource mix to determine the percent of net MISO purchases that can be applied to the CFS, utilities would be claiming for compliance purposes attributes of electricity they do not own. Only the voluntary purchaser can make a credible claim to the emissions attributes of the fuel for which they own a certificate. The suggested hybrid approach does little to prevent double counting of attributes while undermining the expectation of voluntary procurers that their purchases are surplus to regulation. CRS strongly opposes this approach.

Decision Option 28. – *CRS Has No Position*

Decision Option 29. – *CRS Opposes*

Decision Options 30, 31. – *CRS Has No Position*

Decision Option 32. – *CRS Supports*

Decision Option 33. – *CRS Has No Position*

Decision Options 34, 35. – *CRS Has No Position*

Decision Option 36. – *CRS Has No Position*

CRS appreciates the opportunity to contribute its expertise in the tracking and trading of contractual instruments for renewable and carbon-free electricity to the Commission's efforts to fairly implement and enforce Minnesota's new Carbon-Free Standard.

Sincerely,

_____/s/____

Chris Cooper
Policy Director