



117 South First Street • Montevideo, MN 56265

March 19, 2025

Chair Frentz
Senate Energy, Utilities, Environment, and Climate Committee
Re: S.F. 2018

Chair Frentz and Committee Members,

CURE is a rurally based, non-profit organization dedicated to protecting and restoring resilient towns and landscapes by harnessing the power of the people who care about them. We appreciate the opportunity to testify in opposition to S.F. 2018.

In 2023, the legislature passed the 100% carbon-free law. The law explicitly states that “‘carbon-free’ means a technology that generates electricity without emitting carbon dioxide.” That language is not ambiguous. It is crystal clear. If a technology emits carbon dioxide in the process of generating electricity, it is not “carbon-free.” Despite this, S.F. 2018 would declare that “carbon-free” includes a method that, by its very nature, *emits carbon*.¹

This bill follows a concerning trend of attempts to erode the 100% carbon-free law, often under the guise of reliability and affordability.² But carbon-free resources are available now, consistently less expensive than their non-carbon-free counterparts, and both reliable and resilient.³ The future of our energy system may not look like it has in the past, but that does not mean it will be less reliable, less resilient, or more expensive. To achieve that future, we must support the development and deployment of home-grown, *carbon-free* energy resources, grid-enhancing technologies, and energy efficiency measures. This will in turn create jobs and industries in Minnesota for manufacturing, installing, and maintaining these systems and even provide new sources of income for rural counties and those who steward the land.

Delaying this future by granting exemptions for any and every industry that wants one is not in the public interest. It may be economically beneficial to the exempted industries, but it also perpetuates the negative environmental and human health impacts associated with the production and use of such

¹ The production of biofuels, including biodiesel, has additional environmental and human health impacts that are often overlooked. See Angela Scafidi & Haley Leslie-Bole, *Increased Biofuel Production in the US Midwest May Harm Farmers and the Climate*, World Resources Institute, <https://www.wri.org/insights/increased-biofuel-production-impacts-climate-change-farmers> (Feb. 27, 2024).

² Aaron Schwartz et al., *Reality Check: Dispatchability and Reliability Are Not the Same Thing*, RMI, <https://rmi.org/reality-check-dispatchability-and-reliability-are-not-the-same-thing/> (Jan. 8, 2025); Mike O’Boyle & Eric Gimon, *Regulators: Don’t panic and rush to gas amid cries we’re out of power*, Utility Dive, <https://www.utilitydive.com/news/regulators-dont-panic-and-rush-to-gas/712435/> (Apr. 11, 2024).

³ Kingsmill Bond & Sam Butler-Sloss, *Reality Check: The IEA Busts 10 Myths About the Energy Transition*, RMI, <https://rmi.org/reality-check-the-iea-busts-10-myths-about-the-energy-transition/> (Sept. 29, 2023).

sources of energy and discourages the deployment of carbon-free resources. CURE urges you to maintain the original intent and purpose of the 100% carbon-free law and oppose S.F. 2018.

/s/ Sarah Mooradian

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