

October 10, 2022

Minnesota Public Utilities Commission  
121 7th Place E #350  
St. Paul, MN 55101

**RE: Docket No. IP7093 / PPL-22-422**

On behalf of Consumer Energy Alliance (CEA), I write today to thank the Minnesota Public Utilities Commission for receiving public comments on the proposed Midwest Carbon Express carbon dioxide transmission pipeline.

Founded in 2006, CEA is a nonpartisan, nonprofit organization advocating for a balanced energy policy and responsible access to resources. CEA represents virtually every sector of the U.S. economy – from the iron and steel industry to truckers, airlines, agriculture, labor organizations, restaurants, chemical manufacturers, small businesses, and families across the nation – that are concerned about U.S. energy policies, energy security, and long-term price and supply stability. CEA has more than 550,000 individual members and over 375 academic, non-profit, corporate, and union affiliates throughout the United States.

Our members support a rational, all-of-the-above energy policy that utilizes all of our domestic natural resources – both traditional and renewable – while ensuring commonsense environmental protections are in place.

Since our founding, CEA and its members have strongly supported actions that thoughtfully advance our nation towards a cleaner, more environmentally responsible energy future, including emissions reductions that help meet our nation's climate goals. We believe that responsible solutions should always consider the needs of consumers while leveraging and supporting the development of state-of-the-art technologies to improve our environmental stewardship and aid in the continued reduction of all emissions – including smog-forming and greenhouse gases.

To meet our climate challenges, the International Energy Agency has stated that countries around the world must capture and sequester 1.15 billion metric tons of carbon dioxide every year, 30-times more than what we are managing today. With industrial production outpacing pre-pandemic levels, these facilities should be the top priority for climate action – especially since no one solution can address the critical issues being faced by each of our country's various economic sectors.

The proposed carbon dioxide pipeline before the Commission is an example of a carbon management solution that would allow for the capture of up to 12 million tons of CO<sub>2</sub> each year – the equivalent of removing the emissions of 2.6 million vehicles from our roads. By

accomplishing this, it will allow fuels like the ethanol being produced in Minnesota to play an important role in reducing our dependence on imported energy while also lowering emissions.

With 19 ethanol plants operating across the state, Minnesota is the nation's fifth largest ethanol producer with a production capacity of nearly 1.4 billion gallons annually. All these facilities utilize more than 31% of the corn harvested each year in Minnesota as a feedstock.

Safely capturing, transporting, and storing the CO<sub>2</sub> emissions from these ethanol plants will ensure that Minnesota's ethanol industry will be able to continue to supply fuel that will meet new regulations calling for minimized emissions as the country looks to aggregate cumulative impact. In fact, according to a study by Environmental Health and Engineering, Harvard University, and Tufts University, emissions from corn ethanol are 46% lower than gasoline. Additionally, it will also ensure Minnesota's corn farmers will be able to market their harvests locally, as ethanol production generated \$1.3 billion in income for Minnesota households in 2021 alone.

More than meeting our environmental goals, the proposed project will allow families, farmers, and local businesses across the state to continue having access to affordable, reliable fuel and ensure the stability of the industry that provides it. The stable and predictable energy supplies supported by investments in projects like this will help them power their lives, make payroll, and support local communities.

We appreciate the opportunity to offer these comments and urge the Minnesota Public Utilities Commission to evaluate not just the economic benefits projects like Midwest Carbon Express will deliver but also the continued environmental benefits these projects will provide to Minnesota.

Sincerely,

Chris Ventura  
Executive Director  
Consumer Energy Alliance-Midwest