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Comments to the Minnesota Public Utilities Commission

July 7, 2025

In the Matter of the of Possible Changes to Natural Gas Utility Regulatory and Policy Structures in Response to Greenhouse Gas Emissions Goals

PUC Docket Number(s): G999/CI-21-565

Public Comment on the Future of Gas Docket
Submitted by MN350 Action to the Minnesota Public Utilities Commission

Thank you, Chair Sieben, Vice Chair Sulliban, and the Commissioners of the Minnesota Public Utilities Commission for the opportunity to submit this comment. MN350 Action is an environmental justice organization working with frontline communities across Minnesota. We strongly oppose the continued expansion of natural gas infrastructure, including proposed increases in pipeline extension allowances currently under consideration in the Future of Gas docket (G999/CI- 21-565). Expanding fossil fuel infrastructure presents unacceptable risks to public health, climate stability, and economic justice, particularly for low-income and historically marginalized communities.

I. The Public Health and Utility Justice Impacts of Gas Infrastructure Expansion

Continued expansion of gas utility infrastructure harms Minnesotans, especially those who already bear the burdens of pollution and systemic underinvestment. While industry narratives portray natural gas as a “bridge fuel,” the truth is that it brings both immediate and long-term health and safety risks.

As higher-income households transition to electric technologies, lower-income Minnesotans are increasingly left behind. They remain tethered to a polluting and aging gas system that grows more expensive and less safe over time. This disparity deepens existing energy injustice and places the greatest burdens on those least equipped to manage them.

Natural gas leaks release toxic substances including nitrogen dioxide, methane, and benzene. Nitrogen dioxide is known to worsen respiratory conditions, especially in children and older adults; benzene is a documented human carcinogen with no safe exposure level; methane is a

potent greenhouse gas that can displace oxygen in confined spaces, posing acute health hazards.[1]

Exposure to these pollutants has been linked to increased asthma rates in children and heightened cancer risk in areas with long-term exposure. These pollutants also contribute to climate change, which in turn amplifies existing health disparities.[2]

Beyond chronic health risks, gas infrastructure poses immediate safety concerns. Explosions and fires resulting from leaks and system failures have caused death and destruction across the country. For example, the 2010 pipeline explosion in San Bruno, California killed eight people and destroyed 38 homes.[3] In 2023, natural gas incidents led to 23 deaths in the United States—the deadliest year for such incidents since 2004.[4] These are not isolated accidents. They are systemic failures that disproportionately affect under-resourced neighborhoods, where infrastructure maintenance is lacking and emergency response systems are often underfunded.

As more customers leave the gas system, maintenance becomes more expensive, and aging infrastructure becomes more dangerous. Those who remain, typically low-income households, face increasing risks and costs.

II. Economic Inequity and the Case Against Continued Gas Investment

Expanding gas infrastructure at this point in history creates a regressive and unsustainable economic burden. As wealthier households shift to electric heat and cooking, the cost of maintaining the shrinking gas system falls increasingly on lower-income ratepayers. Property owners and taxpayers also bear the long-term costs of stranded assets and leaking abandoned infrastructure.

Minnesota is not alone in confronting these issues. Other states: California, Massachusetts, New York, Oregon, Colorado, Vermont, Maryland, and Washington, are adopting policies to phase out gas in new construction, prioritize building electrification, and modernize electric grids. Consumers are also moving in this direction, choosing electric technologies like heat pumps and induction stoves that offer greater efficiency, safety, and resilience.

Yet utilities continue to build out gas infrastructure and pass the costs on to ratepayers, rather than absorb the financial consequences of investing in outdated technology. As wealthier

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[1] U.S. Envtl. Prot. Agency, *Health and Environmental Impacts of Air Toxics*, Clean Air Act Overview (2022); Agency for Toxic Substances & Disease Registry, *Toxicological Profile for Benzene* (U.S. Dep't of Health & Human Servs. 2023); World Health Org., *Methane: Human Health Effects* (2023).

[2] Environmental Health Perspectives, *Air Pollution and Children's Health: A Review of Adverse Effects*, 130 Envtl. Health Persp. 1 (2022); see also Catherine M. Foreman et al., *Long-Term Exposure to Benzene and Risk of Cancer: A Meta-Analysis*, 129 Envtl. Health Persp. 12 (2021).

[3] Nat'l Transp. Safety Bd., *Pacific Gas and Electric Company Natural Gas Transmission Pipeline Rupture and Fire*, NTSB/PAR-11/01 (Aug. 30, 2011); see also U.S. Dep't of Just., *PG&E Sentenced in San Bruno Pipeline Explosion Case* (Jan. 26, 2017).

[4] Pipeline & Hazardous Materials Safety Admin., *2023 Annual Report: Pipeline Safety Performance Measures* (U.S. Dep't of Transp. 2024); see also Pipeline & Hazardous Materials Safety Admin., *Significant Incidents by Year and State (Gas Distribution)*, available in annual reporting statistics.

customers leave the system, those who remain face higher rates to cover infrastructure that no longer serves the broader public good.

Instead of continuing to expand, utilities should begin responsibly winding down gas infrastructure. They should invest in clean heating alternatives and fund an equitable transition for renters and homeowners who need financial support to electrify their homes. Maintaining obsolete infrastructure only delays this necessary shift and locks communities into decades of pollution, cost, and risk.

Minnesota has an opportunity to lead in clean energy and infrastructure. We should not fall behind by continuing to invest in a fossil fuel system that is quickly becoming obsolete.

III. Natural Gas and the Climate Crisis

Despite industry marketing, natural gas is not a clean or climate-safe energy source. Methane leaks across the entire supply chain make its climate impact comparable to that of coal.[5]

Minnesota has made ambitious commitments to climate action, including achieving 100 percent carbon-free electricity by 2040 and reaching net-zero greenhouse gas emissions by 2050. Continuing to build fossil fuel infrastructure undermines these commitments and makes our climate goals harder to achieve.

Methane, the primary component of natural gas, is the second-largest contributor to global warming. It traps approximately 86 times more heat than carbon dioxide over the first 20 years after release.[6] Building new pipelines today is not a climate-neutral decision—it is an investment in future emissions.

Once infrastructure is built, utilities are incentivized to operate it for as long as possible to recover costs and generate profit. This dynamic ensures that the system will continue emitting greenhouse gases well into the future, long after cleaner alternatives are widely available.

Rather than building more gas lines, Minnesota should invest in clean energy solutions such as electrification, weatherization, geothermal systems, and grid upgrades. These investments can reduce energy costs, improve health outcomes, and increase climate resilience, especially for those most vulnerable.

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[5] 5) Tim McLaughlin & Leah Douglas, *U.S. Natural Gas Pipeline Accidents Pose Big Unreported Climate Threat*, Reuters (Mar. 8, 2024), citing analysis of U.S. Pipeline and Hazardous Materials Safety Admin. data (2010–2023).

[6] Intergovernmental Panel on Climate Change, *Climate Change 2021: The Physical Science Basis*, Contribution of Working Group I to the Sixth Assessment Report of the IPCC, Table 7.15 at 7-123 (V. Masson-Delmotte et al. eds., 2021) (listing global warming potential of methane as 86× that of carbon dioxide over a 20-year period).

The future of energy in Minnesota must be clean, efficient, and equitable. It must reflect community needs and scientific evidence, rather than outdated business models.

Conclusion

MN350 Action urges the Minnesota Public Utilities Commission to reject proposals that expand pipeline extension allowances under the Future of Gas docket. This is a critical moment that demands leadership rooted in public health, environmental responsibility, and economic justice.

Frontline communities cannot afford further delay or disinvestment. The Commission has an opportunity to align energy policy with Minnesota's climate and equity goals, ensuring that all Minnesotans can thrive in a cleaner, healthier future.

Thank you for your time and consideration.

Sincerely,
MN350 Action

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Provide the docket's number.	G999/CI-21-565
Leave a comment on the docket. *	See Attached Public Comment from MN350 Action.
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