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**To:** [Kahlert, Kate \(PUC\)](#)  
**Subject:** COMMENTS ON Proposed Amendment to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines  
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Dear Minnesota Public Utilities Commission,

I am writing to request a hearing in the rulemaking you are conducting on Certificates of Need, Power Plant Siting, and Route Permits for High-Voltage Transmission Lines. I oppose the proposed amendments in their entirety.

We are in the midst of a climate crisis, and it is critical that Commission rules include mechanisms for incorporating climate mitigation and adaptation into its decision making. Yet these rules fail to do so. In deciding whether to issue a Certificate of Need the Commission is required to consider "the effects of the proposed facility upon the natural and socioeconomic environments, including human health, compared to the effects of reasonable alternatives;" at 7849.0120 F, but this is too vague a requirement at a time when climate mitigation considerations are needed. Similarly, The Commission is required to consider "effects on public health and safety" at 7850.4100 B. Once again this is too vague a requirement when climate mitigation considerations are needed.

Environmental justice communities are disproportionately harmed both by climate change and other pollution impacts from energy generation, and it is critical that Commission rules adequately protect environmental justice communities when deciding where to site facilities. These rules fail to do so.

Decisions made around power plants and transmission siting have impacts for decades, and proposed rules must be crafted with input from stakeholders and members of the public and ensure a public engagement process that is accessible to all while prioritizing Tribal Nations and other impacted communities. These rules fail to do so.

The proposed rules exempt large power plants “fueled by gas” from full environmental review, allowing them to follow an accelerated, less stringent review process. This is unacceptable at a time when gas plants, with their emissions of CO<sub>2</sub> and methane, are replacing coal plants as the main contributor to global warming from the utility sector.

For these reasons and more I oppose these rules and request a public hearing before an Administrative Law Judge.

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