

**From:** [Tess Dornfeld](#)  
**To:** [Kahlert, Kate \(PUC\)](#)  
**Subject:** Re: 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, Minnesota Rules Chapters 7849 and 7850 and Governing Notice Plan Filing Requireme...  
**Date:** Wednesday, November 17, 2021 2:50:52 PM

---

**This message may be from an external email source.**

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Hello,

I'm writing to assert that the PUC must hold a public hearing on the Proposed Permanent Rules relating to Power Plants or Lines; Revising the Certificate of Need, and Site and Route Permits Requirements. I oppose the proposed amendments in their entirety.

It is entirely inappropriate for the Commission to update its rules without including any mechanisms for incorporating climate change mitigation or adaptation into its decision-making processes, particularly in the midst of the climate crisis, as outlined in the recent IPCC report.

It concerns me deeply that the proposed rules for establishing need make only passing references to greenhouse gas emissions, and provide no guidance for how projects should assess or report emissions, or what the PUC should do with that information. Regulations for energy infrastructure must address the risks that climate induced weather events pose to proposed projects, and how this will impact communities, and also require that project proposers provide all risk mitigation and recovery plans at the time of application.

The proposed changes are further proof that the Commission's entire rulemaking process has been captured by private industry and does not serve the public interest. Without a genuine stakeholder process, this rulemaking proposes to cement utility control over the process and cut out any meaningful public participation. The Commission must not finalize these rule changes.

The duty of the PUC is to protect Minnesotans and ratepayers from foreseeable risk, and these rule changes do nothing to advance, but rather weaken its purpose. Allowing project proposers to set the timeline for their own permit approvals behind closed doors with the agency is clearly an abdication of authority and an even worse violation of the public trust than the Legislative Auditor outlined last year.

That the Commission would further entrench industry power at the cost of the public indicates a fundamental failure of its mission. For these and additional reasons to be stated at the hearing, I oppose these rule changes in their entirety and support a public hearing before an Administrative Law Judge.

Tess Dornfeld  
614 19th Ave NE  
Minneapolis  
55418-4421

