

From: [Doug Gurian-Sherman](#)
To: [Kahlert, Kate \(PUC\)](#)
Subject: Comment: re: Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site or Route Permit Requirements
Date: Tuesday, November 16, 2021 7:16:03 PM

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To Whom it May Concern,

I am submitting these comments, as a citizen of Minnesota, on the **Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site or Route Permit Requirements**. These rules pertain to the Public Utilities Commission (PUC). I am requesting that the PUC hold one or more public hearings on these proposed rules. I oppose the proposed rules in their entirety.

While there are a number of aspects of these proposed rules that are inadequate, there are several that I want to note in particular.

First, the proposed rules are wholly inadequate in addressing communities currently and historically overburdened by environmental and health challenges. That is, communities already burdened by environmental justice considerations. These communities are often composed especially of people of color, indigenous citizens, and the poor. I live adjacent to and immediately south of the East Phillips neighborhood of Minneapolis, which is already subject to such historic placement of harmful facilities or infrastructure. My neighborhood is also subject to some of these burdens.

Reference to "effects of the proposed facility upon the natural and socioeconomic environments", and other language of the proposed rule, is wholly inadequate to address the heightened environmental and health concerns of such communities. Such language is vague and does not explicitly address these concerns.

Additionally, the proposed rule is wholly inadequate in addressing the existential threat of climate change. Fossil fuel plants must be more explicitly addressed on that basis, or else the PUC fails utterly in its primary function (or all agencies) of protecting the public.

Thank you for your consideration.

Sincerely,
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