

From: [Jennifer Adams](#)
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
Date: Tuesday, November 16, 2021 1:24:10 PM

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Dear Minnesota Public Utilities Commission,

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

I am requesting that the PUC 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 rule in its 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. The proposed rules do not thoroughly address and account for Greenhouse Gas Emissions (GHG), lacking protocol for: how project proposers should assess and report emissions, how to determine a project’s cumulative impact on climate change, or what the PUC would do with this information. We need clear plans and practices for decarbonizing our energy sector and these rules fail to provide that.

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. These rules fail to do so. The current rules do not provide meaningful protection to Black, Indigenous, and other people of color, and low-income communities against potentially harmful and avoidable impacts of new energy infrastructure.

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 impacted communities. These rules fail to do so.

For these reasons and more I oppose these rules and request a public hearing before

an Administrative Law Judge.

Thank you for your time and attention to this important issue.

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