

From: [Kathryn Milun](#)
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
Date: Monday, November 15, 2021 10:21:15 PM

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Dear Minnesota Public Utilities Commission,

I request a public hearing in the rulemaking you are conducting on Certificates of Need, Powerplant 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.

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.

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.

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[Milun, K. \(2020\). Solar Commons: A "Commons Option" for the 21st Century. *American Journal of Economics and Sociology*. 79\(3\), 1023-1057.](#)



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Commons: the vast wealth of nature and humanity that we inherit together and must pass on, undiminished, to
future generations.