



**INTERNATIONAL BROTHERHOOD  
OF ELECTRICAL WORKERS**

September 5, 2025

**Comments from the IBEW Minnesota State Council on Evaluation of Changes to Natural Gas Regulatory and Policy Structures To Meet Minnesota's Greenhouse Gas Goals (Docket G999/CI-21-565)**

Minnesota Public Utilities Commission 121 7th Place East, Suite 350  
St. Paul, MN 55101

*RE: In the Matter the Public Utility Commission's Evaluation of Changes to Natural Gas Regulatory and Policy Structures (Docket G999/CI-21-565)*

Dear Commissioners,

The International Brotherhood of Electrical Workers (IBEW) appreciates the opportunity provided by the Minnesota Public Utilities Commission ("Commission") to comment on potential changes to the state's Natural Gas Regulatory and Policy Structures as they relate to Minnesota Greenhouse Gas Goals (Docket G999/CI-21-565).

Several of our local affiliates represent natural gas workers at Xcel and CenterPoint Energy and the outcome of this docket will be important to the safety of our members and the public. We're focusing our reply to comments submitted by the Citizens Utility Board of Minnesota (CUB) and the Department of Commerce.

The comments filed by CUB have been made and rejected previously by the Commission in recent natural gas resource proceedings. CUB is again pushing the Commission to view Minnesota's net zero carbon emission goals as the overriding factor in energy decisions, ignoring factors such as safety, reliability, affordability and economic development when evaluating the need for natural gas infrastructure. The

Minnesota Legislature has repeatedly instructed the Commission to consider these other factors when evaluating the viability and need for various types of energy generation.

Our biggest concern remains safety. As we continue to work toward a carbon-free energy system by 2040, we will continue to need to invest in the system to meet safety and reliability requirements.

We agree with CUB that we need to continue to evaluate our approach to natural gas infrastructure and policy, particularly the closer we get to 2040. We're going to need a system that is flexible enough to adapt to changes in the industry, but that also provides an alternative to relieve pressure on the grid during periods of peak demand.

As we continue to move away from the use of fossil fuels to electric generation, we will all become more dependent on the electric grid, increasing the danger of price and supply shocks. By maintaining a robust natural gas distribution system, we can provide an off-ramp during periods of peak use, such as a polar vortex.

Finally, we agree with CUB that replacement of delivered fuels should be a priority. However, we also realize the replacement will not necessarily lead to reduced carbon emissions. Cost will ultimately be a major factor in the choices consumers make. It would be nice to think that consumers will always make the most environmentally friendly choices, but it is more likely that the choices would continue to rely more on delivered fuels or wood for home heating.

### **Department of Commerce**

Like CUB, the Department of Commerce comments focused mainly on the 2040 carbon goals and ignored other key factors such safety, reliability, affordability and economic development.

We're concerned at the Department's dismissal of affordability, in particular. There is probably no greater threat to progress on carbon emissions than lack of affordability, yet the Department offers no analysis about how costs will impact energy decisions or how those decisions will impact costs.

Dated: September 5, 2025 Respectfully Submitted,

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