



*Protecting, maintaining and improving the health of all Minnesotans*

May 16, 2014

Dr. Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

RE: Environmental and Socioeconomic Costs Investigation

Thank you for providing the Minnesota Department of Health (MDH) with the opportunity to comment on the potential scenarios for investigation of externality costs from electric generation emissions. The following comments are in response to the stakeholder questions provided at the April 24, 2014 meeting.

Additional greenhouses gasses (methane, nitrous oxide, and fluorinated gases), in addition to CO<sub>2</sub>, should be included in this investigation. The investigation could benefit from a pilot project that compared the results of Scenarios A through C as well as Scenarios D and E to evaluate how the scenarios differ in magnitude. This type of comparison would provide context (i.e. is one scenario more likely to over or under estimate externalities) that could be used as a reference for future review of the selected model outputs. The use of Scenario F in the investigation is not recommended, given that this scenario excludes all greenhouse gases other than CO<sub>2</sub>.

MDH staff do not have any input on additional criteria to consider at this time but would note that the ability to update estimates in the future to account for changing information as well as the credibility of analyses will be key factors staff consider when reviewing model outputs. We will continue to monitor this project as it progresses, participate in future stakeholder meetings as applicable, and review/comment on project documents as they are prepared.

Health starts where we live, learn, work, and play. To create and maintain healthy Minnesota communities, we have to think in terms of health in all policies. Thank you again for the opportunity to provide comments on this project. Feel free to contact me at (651) 201-4927 or [michele.ross@state.mn.us](mailto:michele.ross@state.mn.us) if you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Michele Ross", written in dark ink.

Michele Ross  
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