

September 9, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of a Commission Investigation into Gas Utility Resource Planning
Docket No. G008,G002,G011/CI-23-117**

**In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory
and Policy Structures to Meet State Greenhouse Gas Reduction Goals
Docket No. G999/CI-21-565**

Dear Mr. Seuffert:

The Citizens Utility Board of Minnesota (“CUB”) and Clean Energy Organizations (“CEOs”) jointly submit the below preferred decision options, in addition to the list of Joint Preferred Decision Options submitted today by the CEOs on behalf of the CEOs, Center for Energy and Environment, CUB, the Office of the Attorney General, Building Decarbonization Coalition and the Department of Commerce.

Equity:

9. **Modified:** Adopt the following Encourage utilities to follow best practices for Community Engagement in the gas IRP process, such as:
 - A. Provide healthy and appropriate food/beverages.
 - B. Coordinate with local community leaders in advance to assure high attendance and awareness.
 - C. Provide information during existing community events/meetings.
 - D. When transit is available, choose locations with walkable access to major transit lines.
 - E. Schedule during a reasonable time after typical working hours and school hours if planned during the week.
 - F. Provide dependent-friendly spaces.
 - G. Prioritize public meetings in areas designated as ‘Green Zones’ by any unit of government, or in identified environmental justice areas as designated by MPCA.
 - H. Designate space for community organizations or nonprofits to set up information and engage with attendees, equivalent in location and prominence to information provided by utilities
 - I. Allow commenters to provide feedback over the phone or by other means when requested by the community.

- J. Contact government bodies and community groups before scheduling public meetings to provide input on scheduling.
- K. Incorporate and adopt, as appropriate, explicit standards and guidance set out by the White House Environmental Justice Advisory Council in the context of other types of new infrastructure buildout
- L. Adopt best practices laid out in the 1997 White House CEQ guidance on eEnvironmental justice under NEPA, which requires adaptive techniques for gathering information and/or for seeking comment from tribal members and low-income communities.

Expansion Alternatives Analysis:

- 17. Require that projects that are geographically related and/or interdependent on each other be considered as a single capacity expansion project for the purposes of determining EAA eligibility above the cost threshold.

Greenhouse Gases:

- 49. **Modified:** Consistent with a 10-year planning horizon, ~~R~~require each utility to include in each gas integrated resource plan the emissions projected to result from its preferred plan and from the other resource mixes considered. Projected emissions shall include all in-state and out-of-state emissions from distribution system operations and upstream emissions associated with purchased gas using recognized reporting protocols and available tools.

Forecast:

- 80. Require utilities, in each gas integrated resource plan, to indicate how the utility load and customer forecasts incorporate, to the extent practicable, relevant external factors including, but not limited to:
 - A. the effect of current or enacted state and local building codes and standards;
 - B. building electrification, efficient fuel-switching, and energy efficiency programs or incentives offered by both the gas utility and the local electric utility or local, state, or federal entities that overlap with the utility's gas service territory;
 - C. the effects of rate design and/or demand response programs;
 - D. changes in the utility's line extension policies, and the associated impact on gas customer growth; and
 - E. the price elasticity of demand (e.g., the impact of reduced throughput and rate increases on sales and peak demand requirements and impacts of commodity prices).

Other:

CUB and the CEOs support the below New local government decision option, filed by the local government joint commenters on September 6, 2024:

Natural gas utilities shall work with local government agencies to:

1. Consider local climate goals in resource plans and provide a narrative discussion of how resource plans impact those goals.
2. Collaborate with local governments with adopted climate goals to prioritize greenhouse gas reduction investments and pilots when possible.
3. Actively include local government representatives in resource planning stakeholder engagement to discuss community-specific concerns. Gas utilities will provide a narrative description of its government engagement activities and a summary of how input is or is not incorporated into final decisions.
4. Align gas infrastructure projects with approved community capital improvement plans. Plans will include a narrative description of how utilities will coordinate with government representatives.

Thank you for the opportunity to summarize our recommendations.

Sincerely,

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-565_Official Service List

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