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To: [Kahlert, Kate \(PUC\)](#)
Subject: Opposition to Proposed Amendment to Rules Gov Cert of Need
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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, Minnesota Rules Chapters 7849 and 7850 and Governing Notice Plan Filing Requirements, Minnesota Rules, part 7829.2550; Request to Schedule a Rules Hearing; and Request to Review Additional Notice Plan; Including Repeal of Minn. R. 7829.2550; 7849.0230; 7849.0240; 7849.1100; 7849.1300; 7850.1600; 7850.2000; 7850.2600; 7850.2900; 7850.3000; 7850.3100; 7850.3200; 7850.3300; 7850.3400; 7850.3500; 7850.3600; 7850.4000; 7850.4200

Greetings Public Utilities Commission Staff,

I am writing to request a hearing regarding the rulemaking being conducted 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 torrent of a global climate crisis. Therefore, it is entirely inappropriate for the Commission to update its rules without including any mechanisms for incorporating climate change mitigation or adaptation into its decision-making processes. The rules must protect Indigenous rights and environmental justice communities. Currently the Commission's rulemaking-process does not serve the public interest. Without a true stakeholder process that validates the perspectives of Tribal Nations, climate advocates, environmental justice communities, low-income advocates, young people fighting for their futures, and those who represent the interests of the most vulnerable, this rulemaking process proposes to cement utility control over the process and cut out any meaningful public participation. The Commission must not finalize these rules as proposed.

I am especially concerned with the public health implications of the Commission actions which will potentially make decades of major decisions under these entirely inappropriate standards. Without any consideration of how these projects harm the most vulnerable, how they further harm Minnesota's weakened environment, or even how large energy infrastructure will be decommissioned when it is abandoned by utilities, the Commission is abdicating its role in protecting the public from harmful externalities. As the entire energy system transitions away from polluting sources of energy, we need to have the tools necessary to protect public health and taxpayers from the inevitable collapse of these polluting industries and the toxic legacy they will leave to people who are least able to protect themselves.

The Commission's duty is to protect Minnesotans and ratepayers from foreseeable risk, and these rules do nothing to protect us from the harms that menace us the most. Allowing project proposers to set the timeline for their own permit approvals behind closed doors with the agency is a critical violation of the public trust.

For these reasons and more that will be stated at the hearing, I oppose these rules. I request a public hearing before an Administrative Law Judge. The Commission completely rewrite these rules with particular consideration to protecting ALL Minnesotans and our climate.

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