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To: [Kahlert, Kate \(PUC\)](#)
Subject: Request Public Hearing on Proposed Amendment to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines
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Public Utilities Commission,

I request that the PUC hold a public hearing on the ‘Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site and Route Permits Requirements.’ I oppose the proposed rule in its entirety.

The rules are underinclusive, underprotective and too vague to provide meaningful protection to overburdened Black, Indigenous, and other people of color, and low-income communities against unnecessary and avoidable impacts of new energy infrastructure.

The proposed rules do not adequately address how the distribution of both environmental harms and benefits should be brought to bear on the decisions regarding need and siting of energy projects, with special consideration given to those impacts on overburdened and underresourced communities.

The proposed rules provide an overwhelming number of points in the process where the public is expected to provide informed comment, in some cases setting up overlapping timelines for comment periods. For example, the rules combine the informational meetings agencies are required to hold with the scoping comment period -- meaning that the public is required to make important scoping comments before they know what the project they’re commenting on is about. As such, the rules create a barrier to participation especially from affected communities that are already overburdened and under-resourced.

For these reasons and more I oppose these rules and request a public hearing before an Administrative Law Judge.

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