



In the Matter of Possible Rulemaking to Amend Minnesota Rules, Chapter 7825

PUC Docket Number: E,G-999/R-26-81

Reply Comments

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to offer comments on the petition filed by Utility Reform Now! (“URN!”) calling on the Minnesota Public Utilities Commission to initiate rulemaking to amend Minnesota Rules chapter 7825 to adopt several 1982 Policy Statements as rules. We agree with comments filed by the Office of the Attorney General Residential Utilities Division and Joint Utilities, which explain why such rulemaking is neither required by law nor prudent.

Nothing in the 1982 Policy Statements has been applied as a rule, and to the degree URN! believes that specific decisions are in error, they are welcome to make those arguments in the relevant proceedings. Beyond the lack of any legal requirement that the Commission adopt the guidance in the form of rules, we strongly agree with Joint Utilities’ caution about the potential negative impact of initiating an unnecessary rulemaking proceeding.

“Rulemaking proceedings can consume significant resources, adding to the regulatory burden of both the Commission and other stakeholders, including the Joint Utilities. In addition, given the volume and importance of the many regulatory matters currently before the Commission, the Joint Utilities are concerned that pursuing [*sic*] such a rulemaking would divert scarce resources from these existing matters.”

In plain language, the proposed rulemaking would amount to a tremendous waste of time, at a moment when the Commission has no time to waste.

We thank the Commission for its consideration in this matter.

Sincerely,

Kevin Pranis
Marketing Manager
LIUNA Minnesota and North Dakota