

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

Hello staff of the Public Utilities Commission,

Cooperative Energy Futures is writing to request a hearing in the rulemaking you are conducting on Certificates of Need, Powerplant Siting, and Route Permits for High-Voltage Transmission Lines. **We oppose the proposed amendments in their entirety.**

Given that we are in the grips of a global climate crisis 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 fact that these rules do nothing to protect Indigenous rights and environmental justice communities is further proof that the Commission's entire rulemaking process has been industry-captured and does not serve the public interest. Without a true stakeholder process that valorizes 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 proposes to cement utility control over the process and cut out any meaningful public participation. **The Commission must not finalize these rules as proposed.**

Cooperative Energy Futures is especially concerned with the implications this could have on the energy burden, community wealth building ability, and health of low-to-moderate income Minnesotans as well as the effects it could have on the progress of transitioning into a renewable energy future in a just manner. We are concerned that changing the Certificate of Need rules will make it easier for utilities to site power plants and route transmission lines in an area with a less thorough analysis of its harms or better alternatives.

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 clearly an abdication of authority and an even worse violation of the public trust than the Legislative Auditor outlined last year. Why the Commission would further entrench industry power at the cost of the public and think that this was a good policy direction is beyond us. Furthermore, the total lack of respect for Tribal Nations is apparent in the regulations attempt to categorize them as local governments, to be contacted when project proposers want to.

For these reasons, and more that will be stated at the hearing, Cooperative Energy Futures opposes these rules and requests a public hearing before an Administrative Law Judge. The Commission should scrap these rules and start again, but this time protecting Minnesotans and our climate.

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