

**From:** [Wufoo](#)  
**To:** [Staff, CAO \(PUC\)](#)  
**Subject:** Submitted Public Comment Form  
**Date:** Tuesday, July 8, 2025 4:28:12 PM

---

**This message may be from an external email source.**

Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Name *	Jon Hunter
Address	<input type="checkbox"/> PO Box 4037 American Lung Association Saint Paul, MN 55104 United States
Phone Number	(651) 268-7601
Email	<a href="mailto:jon.hunter@lung.org">jon.hunter@lung.org</a>
Provide the docket's number.	G999/CI-21-565
Leave a comment on the docket. *	Please see the attached comments from American Lung Association. Thank you.
Attach a File	 <a href="#">minnesota_puc_comment_natural_gas_lines.pdf</a> 241.71 KB · PDF

July 8, 2025

Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
Saint Paul, MN 55101-2147

Re: Docket Number G999/CI-21-565: In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals

Dear Commissioners of the Minnesota Public Utilities Commission:

On behalf of The American Lung Association, I respectfully submit this comment in the matter of a commission evaluation of changes to natural gas utility regulatory and policy structures to meet state greenhouse gas reduction goals. As an organization dedicated to saving lives by improving lung health and preventing lung disease, we urge the Commission to recognize the serious public health consequences associated with continued reliance on natural gas, particularly the impacts on indoor air quality and respiratory health.

Natural gas combustion releases a range of harmful air pollutants both indoors and outdoors. In homes and buildings, the use of natural gas appliances — including stoves, ovens, furnaces, and water heaters — leads to the release of nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), fine particulate matter (PM<sub>2.5</sub>), and formaldehyde.<sup>1</sup> These pollutants are known to exacerbate asthma, increase the risk of respiratory infections, and worsen chronic obstructive pulmonary disease (COPD).<sup>2</sup>

Children are especially vulnerable. The presence of NO<sub>2</sub> indoors — often at levels exceeding outdoor air quality standards — can also contribute to airway inflammation and reduced lung function. For adults with pre-existing lung conditions, such as asthma, emphysema, or COPD, exposure to indoor air pollutants generated by natural gas combustion can trigger severe symptoms, increase hospital visits, and reduce quality of life.<sup>3</sup> Moreover, many homes in

---

<sup>1</sup> E. Morales et al., Association of Early-Life Exposure to Household Gas Appliances and Indoor Nitrogen Dioxide with Cognition and Attention Behavior in Preschoolers, 169 *Am. J. Epidemiol.* 1327 (2009), <https://academic.oup.com/aje/article-abstract/169/11/1327/159993>; S. Chowdhury et al., A Global Review of the State of the Evidence of Household Air Pollution's Contribution to Ambient Fine Particulate Matter and Their Related Health Impacts, 173 *Env't Int'l* 107835 (2023), <https://pubmed.ncbi.nlm.nih.gov/36857905/>.

<sup>2</sup> S.A. Meo et al., Environmental Pollutants PM<sub>2.5</sub>, PM<sub>10</sub>, Carbon Monoxide (CO), Nitrogen Dioxide (NO), 28 *Eur. Rev. Med. Pharmacol. Sci.* 789 (2024), <https://www.europeanreview.org/wp/wp-content/uploads/789-796.pdf>.

<sup>3</sup> S. Y. Kim, E. Kim & W. J. Kim, Health Effects of Ozone on Respiratory Diseases, 83 *Tuberculosis & Respiratory Diseases Supp.* 1, S6–S11 (2020), <https://doi.org/10.4046/trd.2020.0154>, <https://e-trd.org/journal/view.php?doi=10.4046/trd.2020.0154>.

Minnesota rely on combustion-based heating during long winter months, increasing the duration of exposure to these harmful pollutants.<sup>4</sup>

Poor indoor air quality is not experienced equally. Lower-income households and communities of color are more likely to live in older housing with inadequate ventilation or maintenance, and often lack the resources to mitigate exposures.<sup>5</sup> These same communities already bear a disproportionate burden of outdoor air pollution, making indoor exposures from natural gas a compounding and cumulative threat to respiratory health and overall well-being.

Moreover, continued expansion or reinforcement of natural gas utility structures stands in direct contradiction to Minnesota's own climate and clean energy policies. The state's Climate Action Framework sets a clear goal to reduce greenhouse gas emissions from existing buildings by increasing energy efficiency and transitioning away from fossil fuel use.<sup>6</sup> This vision has been codified in recent legislation, including the Natural Gas Innovation Act<sup>7</sup> and the Energy Conservation and Optimization (ECO) Act<sup>8</sup>, which explicitly recognize and support beneficial electrification and fuel switching from gas to cleaner electricity as essential strategies for meeting state climate and public health goals.

Efforts to maintain or expand gas infrastructure run counter to this framework and risk locking in decades of additional emissions, public health burdens, and economic costs. Instead, Minnesota should pursue regulatory and utility reforms that align with its stated climate and health priorities — prioritizing zero-emission technologies that protect the lungs and lives of all Minnesotans.

As the Commission considers the future of natural gas utility structures, we urge you to center health in the decision-making process. Reducing reliance on natural gas is not only critical for meeting greenhouse gas reduction goals — it is also a key step toward protecting the lungs and lives of Minnesotans.

We thank you for your attention to this vital issue and welcome the opportunity to collaborate in advancing solutions that promote healthy air and healthy communities.

Sincerely,



Jon Hunter

Senior Director, Healthy Air Solutions

---

<sup>4</sup> Minn. Pollution Control Agency, Greenhouse Gas Emissions Data by Sector, <https://data.pca.state.mn.us/views/Greenhousegasemissionsdata/Sectordetails>

<sup>5</sup> Christopher W. Tessum et al., PM2.5 Polluters Disproportionately and Systemically Affect People of Color in the United States, 7 *Sci. Adv.* eabf4491 (2021), <https://www.science.org/doi/10.1126/sciadv.abf4491>.

<sup>6</sup> Minn. Climate Change Subcabinet, Minnesota Climate Action Framework (2022),

<https://climate.state.mn.us/sites/climate-action/files/Climate%20Action%20Framework.pdf>

<sup>7</sup> Minn. Pub. Utils. Comm'n, Natural Gas Innovation Act Implementation, <https://mn.gov/puc/activities/economic-analysis/ngia/>

<sup>8</sup> Minn. Dep't of Commerce, Conservation Improvement Program (CIP) / Energy Conservation and Optimization (ECO) Act, <https://mn.gov/commerce/energy/conserving-energy/eco/>