

From: [Andrew Butts](#)
To: [Kahlert, Kate \(PUC\)](#)
Subject: Public Comment on "Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site and Route Permits Requirements"
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Dear PUC (via Kate Kahlert),

My name is Andrew Butts and I am the Founder and Executive Director of the Green Neighbor Challenge, a non-profit project dedicated to helping ordinary residents access green energy. We were founded in Minnesota as a product of my time studying energy policy at the Humphrey School and most of our all-volunteer team and advisory board reside in Minnesota, though I personally have been displaced during the pandemic back to my home state of Wisconsin. **As a lifelong asthmatic who grew up down the road from the largest coal-fired power plant in Wisconsin (at the time), I deeply appreciate the need for a rapid energy transition, as well as, crucially, a just energy transition.** All too often however, industry has leveraged its power to accelerate development in the short term, while betraying justice and true speed over the long term. **We cannot effectively move forward by leaving people behind.**

Regarding the proposed revisions to the 'Proposed Permanent Rules Relating to Power Plants or Lines; Revising the Certificate of Need and Site and Route Permits Requirements,' too many ordinary residents will be left behind and excluded from meaningful participation, consideration, and benefits arising from a green energy transition if these rule changes are adopted. There must be consideration given to frontline communities already suffering from the burdens of our existing energy system. Consideration given to the impact of greenhouse gas emissions on accelerating climate change and associated climate disasters. There must be considerations given to the equitable distribution of harms and benefits from energy developments. There must also be a respect for sovereign tribal nations and the international treaty rights they retain. **And having previously struggled myself to navigate, get informed in, and participate in a docket, even with a master's degree in energy policy, there must be far more consideration given to the public participation notices, timelines, processes, and information sharing during all parts of the decision making process with those affected.** The legislative auditor's review of PUC's existing public participation processes from last year confirms as much: **"PUC's public participation processes are complex, varied, and have been implemented inconsistently. Further, PUC has not done a good job helping the public understand how to participate in those processes.** We make a number of recommendations for improvements."

(<https://www.auditor.leg.state.mn.us/ped/pedrep/puc2020.pdf>).

Given all that, **I am requesting 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.**

Thank you for your consideration,

Andrew Butts
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Science, Technology, and Environmental Policy (MS)
(He/Him/His)