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To: [Kahlert, Kate \(PUC\)](#)
Subject: Request for Hearing and Comments, Docket # 12-1246
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To the staff and Commissioners of the Public Utilities Commission:

I am writing to request that the PUC hold a public hearing on the “Possible Amendments to Rules Governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines, Minn. R., Chapters 7849 and 7850; and to Rules Governing Notice Plan Requirements for High-Voltage Transmission Lines, Minn. R., part 7829.2550.”

I oppose the proposed rules in their entirety but would like to highlight a few areas where these proposed rules fall egregiously short:

- Too often polluting facilities and infrastructure are situated in communities where people of color, low-income people, and those with limited English-language proficiency live and work, contributing to higher rates of pollution, disease, and other public health crises. COVID-19 has further demonstrated how poor air quality from pollution can lead to increased mortality from respiratory disease. Despite these facts, these proposed rules do not require the PUC to assess how the cumulative impacts of large power plants and related infrastructure can place additional burdens on minority and low-income communities that already face health and environmental threats.
- Climate change is increasingly causing more extreme weather events, including severe storms, heat, and floods which in turn bring disproportionate harm to low-income communities and Black and Indigenous and other communities of color who are least equipped to respond and recover from them. However the proposed rules do not recognize disaster risk as a consideration for project approval or siting. Siting regulations for energy infrastructure must address the risks that climate-induced weather changes pose to proposed projects, how this will impact disadvantaged communities, and also require that project proposers include risk mitigation and recovery plans at the time of application.
- Perhaps in an attempt to give a veneer of accessibility to the process, the PUC has made meaningful public participation a Sisyphean task that will only serve to further exclude overburdened, working people and communities from having a say in the decisions that will impact them. The rules require that concerned individuals intervene with informed input at various points in a complicated process, often with unreasonably short comment periods and occasionally with overlapping timelines. The burden this places on the public, especially those who are already vulnerable or targeted for exploitation is exclusionary and discriminatory.

Thank you for your attention.

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