



September 9, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

Re: *In the Matter of a Commission Evaluation of Changes to Natural Gas Utility Regulatory and Policy Structures to Meet State Greenhouse Gas Reduction Goals - PUC Docket Nos. G008,G002,G011/CI-23-117, G999/CI-21-565*

Executive Secretary Seuffert,

CURE, MN350 Action, Minnesota Interfaith Power & Light, Midwest Building Decarbonization Coalition, Ayada Leads, and concerned members of the public (collectively "Commenters") submitted reply comments on July 19th, 2024, in the above-named docket. Commenters submit this short filing in support of particular decision options prepared by staff in the briefing papers filed in this docket on August 29th, 2024.

I. Support for decision options

Commenters support decision options: 1, 2, 5, 6/7, 8, 9, 10, 12, 17, 24, 25, 27, 28, 29, 30, 32, 33, 34, 35, 37, 38, 40, 41, 42, 43, 44/45, 46, 47, 48, 49, 50, 52, 53, 54, 55, 57, 58,59, 60, 61, 62, 67, 68, 70, 72, 73, 76, 77, 78, 79, 80, 91, 92, 93, 95, 98, and 99.

II. Edits to Ayada et al. decision options

Commenters offer these minor edits to two decision options that staff prepared based on our reply comments:

Decision option 5:

Require the gas utilities required to file gas IRPs to facilitate effective engagement with members of impacted communities (including community groups, local leaders, tribal leadership, and elders) throughout the integrated resource planning process.

Decision option 9:

~~Adopt~~ Require the gas utilities to adopt, when practicable, the following best practices for Community Engagement in the gas IRP process (Ayada et al.; Staff modification of formatting) [*The Commission may select any or all of the following:*]

- A. Provide healthy and appropriate food/beverages.
- B. Coordinate with local community leaders in advance to assure high attendance and awareness.
- C. Provide information during existing community events/meetings.
- D. When transit is available, choose locations with walkable access to major transit lines.
- E. Schedule during a reasonable time after typical working hours and school hours if planned during the week.
- F. Provide dependent-friendly spaces.
- G. Prioritize public meetings in areas designated as ‘Green Zones,’ by any unit of government, or in identified environmental justice areas, as designated by MPCA.
- H. Designate space for community organizations or nonprofits to set up information and engage with attendees, equivalent in location and prominence to information provided by utilities.
- I. Allow commenters to provide feedback over the phone or by other means when requested by the community.
- J. Contact government bodies and community groups before scheduling public meetings to provide input on scheduling.
- K. Incorporate and adapt, as appropriate, explicit standards and guidance set out by the White House Environmental Justice Advisory Council ~~in the context of other types of new infrastructure buildout.~~

L. Adopt best practices laid out in the [1997 White House](#) CEQ guidance on [Environmental Justice under NEPA](#), which requires adaptive techniques for gathering information and / or for seeking comment from tribal members and low-income communities.

/s/ Hudson Kingston

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