



**In the Matter of the Application of Gopher State Solar, LLC for a Site Permit for the up to 200 MW Gopher State Solar Project in Renville County, MN**

**Docket No. IP7127/GS-24-106**

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity provided by the Minnesota Public Utilities Commission (“Commission”) to offer written comments on the application of Ranger Power LLC (“Ranger”) for Site Permits for development of an up to 200-megawatt (“MW”) solar generation project in Renville County. We believe that the project could deliver significant economic and energy benefits to LIUNA members and other residents of Western Minnesota.

The potential for the project to provide construction employment and career opportunities is highlighted in the Environmental Assessment:

The use of local workers who reside in Renville County could have significant positive impacts, not only through providing employment, but by developing employment opportunities, offering living wage jobs that attract young people and support families, and providing experience for the local labor force tailored to industry needs. Employment in the renewable energy sector provides workers the opportunity to develop the required technical skills to work in the green economy, which can increase opportunities for future employment. Minnesota is anticipated to continue to expand renewable energy development in the coming years, and the state’s investments in the development and incentivization of clean energy will enable future renewable projects. (P. 57)

The Environmental Assessment also specifically identifies use of local vs. non-local workforce as a critical determinant for a project’s local employment and economic impact, observing that, “Local workers are found to generate approximately three times more local economic activity through spending than a non-local worker at the individual level, and a largely local workforce can generate up to double the economic impact of a largely non-local workforce.” (Ibid.)

In recently-enacted legislation, including laws requiring 100% clean power and streamlining permitting, Minnesota legislators have made clear that the permitting process for large energy projects approved by the Commission should prioritize the creation of high-quality jobs and career opportunities for local workers with a focus on construction, specifically adding the following criteria for consideration:

(14) evaluation of the proposed facility's impact on socioeconomic factors; and

(15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts, and may reject or place

conditions on a site or route permit based on the local employment and economic impacts. (Minn. Stat. § 216E.03, Subd. 7)

Given the importance of local workforce utilization, we appreciate the message we have received from Ranger parent company D.E. Shaw Renewable Investments (“DESRI”) that DESRI plans to work with LIUNA and other Building Trades unions to maximize local employment and construction career opportunities. LIUNA has a long and successful history of working with clean energy developers and contractors to build utility-scale projects across Minnesota using local, skilled labor, and we are confident in our ability to do so again with this project. Based on DESRI’s labor commitments and plans, we believe that the project will deliver sufficient net employment and economic benefits to meet the statutory requirements and urge the Commission to grant a site permit.

We thank Commissioners for their thoughtful consideration.

Dated: April 11, 2205

Respectfully Submitted,

Kevin Pranis, Marketing Manager  
LIUNA Minnesota and North Dakota  
81 Little Canada Road  
St. Paul, MN 55117