



In the Matter of the Joint Application of Northern Crescent Solar LLC for a Solar Energy Generating System Site Permit and a Battery Energy Storage System Site Permit for the up to 150 MW Northern Crescent Solar and up to 50 MW Energy Storage System Project in Faribault County, Minnesota

Docket Nos. IP-7096/GS-22-57; IP-7135/ESS-24-238

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity provided by the Minnesota Public Utilities Commission ("Commission") to offer comments on the application of Primergy Solar subsidiary Northern Crescent Solar, LLC ("Primergy") for Site Permits for development of a 150-megawatt ("MW") solar generation project and 50 MW battery storage project in Faribault County. In our view, Northern Crescent Solar has potential to deliver significant energy and socioeconomic benefits to south-central Minnesota.

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)

LIUNA has a long and successful history of working with clean energy developers and contractors to build utility-scale projects in Southern Minnesota and across the state using local, skilled labor. We have had the opportunity to discuss construction plans for the project with Primergy and appreciate the company's willingness to partner and commitment to use of local union labor to build the project.

Primergy's commitment will help to ensure that the project creates high-quality jobs and career opportunities for local residents whose paychecks will contribute to the local economy. For this reason, we believe that the project meets the above mentioned statutory requirements and urge the Commission to approve the requested site permits.

We thank the Commission for its consideration.

Respectfully Submitted,

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