



## Comments from LIUNA Minnesota and North Dakota

September 6, 2024

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

RE: Minnesota Energy Connection

*In the Matter of Certificate of Need and Route Permit Applications for the Minnesota Energy Connection Project in Sherburne, Stearns, Kandiyohi, Wright, Meeker, Chippewa, Yellow Medicine, Renville, Redwood, and Lyon counties in Minnesota (PUC Docket Number: E-002/CN-22-131)*

Dear Mr. Seuffert,

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity provided by the Minnesota Public Utilities Commission ("Commission") to comment on the application of Xcel Energy ("Xcel") for a Certificate of Need ("CN") for the Minnesota Energy Connection ("MEC") transmission line from the Sherburne County Generating Station (Sherco) to Lyon County, Minnesota.

LIUNA strongly supports timely approval and construction of MEC, which is essential to relieve existing transmission congestion and support development of renewable energy in resource-rich Southwest Minnesota to the common benefit of Xcel ratepayers and local communities. While developers and utilities have managed to find workarounds, including shared interconnections with peaker plants, transmission remains a major constraint, and Xcel's Gen-Tie lines offer a way forward as we wait for significant new transmission investment.

MEC provides unique benefits to Xcel customers and Minnesota residents compared to other much-needed transmission line projects. The retirement of Sherco coal units allows valuable transmission interconnection rights to be redeployed to support clean energy development, but only if we build infrastructure to deliver wind and solar power to the interconnection point. While there may be multiple options for transmitting electricity across the grid, MEC is the only feasible option to preserve the interconnection and relieve system congestion.

Further, we believe that MEC will provide unique opportunities by integrating generation, storage and transmission under common regulated ownership which will support maximum utilization of the transmission line and interconnection. MEC is by far the most efficient and effective option to meet the need for transmission capacity while protecting and maximizing the

value of other resources. The record clearly shows that no alternative provides an equivalent benefit to the project as proposed.

Finally, we believe that MEC has the potential to support the creation of thousands of high-quality construction jobs, both directly on construction of the line and indirectly on construction of wind, solar, battery storage, and other interconnected resources. In recent years, Minnesota utilities and clean energy developers have partnered with LIUNA and other unions to maximize local employment opportunities, assisted by the Commission's labor statistics reporting requirements which have increased transparency. The Commission could ensure continued progress and transparency by requiring labor statistics reporting for MEC and all of the interconnected generation and storage projects.

We thank Commissioners for their thoughtful consideration.

Dated: September 6, 2024

Respectfully Submitted,

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