

**Comments from Operating Engineers Local 49 and North Central States Regional Council
of Carpenters**

February 18, 2025

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

*In the Matter of the Otter Tail Power Company's Petition for Approve of the Solway and
Abercrombie Solar Projects (24-404)*

Dear Mr. Seuffert,

Thank you for the opportunity to submit comments on this matter.

As the Public Utilities Commission (Commission) knows, our unions represent workers in the construction industry who build and maintain energy infrastructure—including solar. Both of our unions participated in the most recent Otter Tail Power (OTP) Integrated Resource Plan (IRP) and supported the direction approved by the Commission which included a transition of Minnesota's ownership portion of Coyote Station to Available Maximum Energy (AME) dispatch and replacement with solar resources.

We support OTP's proposed investments in the Solway and Abercrombie solar projects which will provide cost-effective solar energy for Minnesota ratepayers and will allow OTP to comply with Minnesota's clean energy requirements. We also believe both projects should qualify for the application towards OTP's obligations under the 100% by 2040 law. We also support the use of the Renewable Resources Cost Recovery Rider for these projects.

The most recent OTP IRP also included provisions intended to ensure that projects maximize opportunities for high-quality opportunities for local workers. We have already begun conversations with OTP on how to maximize these opportunities and we look forward to continuing to partner with OTP through the development and construction phases to ensure we meet these requirements.

Thank you for the opportunity to provide comments.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating
Engineers Local 49

Richard Kolodziejski, Public Affairs Director, North Central States Regional Council of Carpenters