

**FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION**  
**121 Seventh Place East Suite 350**  
**St. Paul, MN 55101**

In the Matter Dodge County Wind, LLC's  
Certificate of Need, LWECS Site Permit,  
and HVTL Route Permit applications for the  
Dodge County Wind Project and associated  
facilities in Steel, Dodge, and Olmstead  
counties in Minnesota

MPUC DOCKETS IP-6981/CN-17-306  
WS-17-307/TL-17-308

OAH DOCKET 5-2500-35668

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**Supplemental Comments on Process for Consideration of Dodge Wind Dockets**

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The Laborers District Council of Minnesota and North Dakota (“LIUNA Minnesota & North Dakota”) appreciates the opportunity to update the Minnesota Public Utilities Commission (“Commission”) regarding the status of our discussions with Dodge County Wind, LLC (“Applicant”) and our views on the disposition of the Dodge County Wind dockets.

We are happy to report that all of our concerns regarding the use of local workforce on the proposed project have been resolved thanks to the efforts of Applicant, parent company NextEra Energy Resources, and Applicant’s intended general contractor Blattner Energy. NextEra and Blattner have recently indicated their intention to work with construction trade unions representing Laborers, Ironworkers, Operating Engineers, and Electricians to recruit a skilled workforce that is at least 60-percent local, which will in turn help to maximize the project’s benefits to local workers and communities.

In light of the resolution of concerns regarding local construction local hiring and related socioeconomic impacts, we have no objection to Applicant’s request to withdraw the HVTL Route Permit, and see merit in Applicant’s request to continue the permitting process using an Environmental Assessment rather than an Environmental Impact Statement.

We recognize that review of the Dodge County Wind applications is complicated by the loss of the planned transmission interconnection. We believe, however, that there is value in preserving the work that has helped to produce a project with significant potential local benefits, and do not see any need for delay or duplication of effort. Further, we would note that the transmission difficulties faced by Applicant are occurring across the industry and suggest that the Commission consider adjusting its normal process to avoid penalizing applicants for circumstances beyond their control.

LIUNA Minnesota & North Dakota had made specific requests for the Commission to address two outstanding issues: first, our motion to compel discovery with respect to

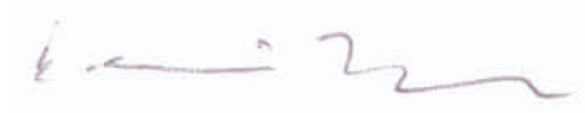
construction hiring practices; and second, a request to clarify that our organization may be represented in Commission proceedings by a non-attorney.

With respect to the first matter, LIUNA Minnesota & North Dakota formally withdraws all discovery requests in this proceeding since the information requested has been superseded by Applicant's commitments to employ local labor. At the same time, we agree with the Department of Commerce that it would be helpful for the Commission to clarify that construction employment is a potentially relevant subject for review and discovery in energy facility Certificate of Need and Site Permit cases to avoid future confusion.

We would also very much appreciate clear guidance from the Commission in the matter of party representation, which affects not only LIUNA Minnesota & North Dakota, but also other current and potential citizen interveners. In the absence of an Order from the Commission, we fear that our participation and the participation of others could be challenged or otherwise limited in other cases.

We thank the Commission for considering our input

Dated: October 30, 2019

A handwritten signature in blue ink, appearing to read "Kevin Pranis", is written over a light blue horizontal line.

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