

Reply Comments on Minnesota Power's Petition for Approval of the Acquisition of Solar Power to Support Economic Relief and Recovery

PUC Docket Numbers:

Docket No. E015/M-20-828 & Docket No. E, G-999/CI-20-492

LIUNA Minnesota & North Dakota offers the following reply comments on Minnesota Power's petition for approval of an expedited procedural timeline for the Company to pursue 20 megawatts (MW) of utility scale solar. We have reviewed comments submitted by Minnesota Power (MP) and other parties, and believe that, taken as a whole, they underscore the case for Commission approval.

We would urge the Commission to weigh comments submitted by the Department of Commerce (DoC) and Office of the Attorney General (OAG) expressing concern over ratepayer impacts against a record that demonstrates overwhelming support for the project from organizations and elected officials that represent large groups of the same ratepayers. It's hard to think of a proposed utility investment of similar size and scope that elicited such strong and broad-based support, including unprecedented support from a tri-partisan group of elected officials.

LIUNA Minnesota and North Dakota is headquartered in St. Paul, but we represent members who live across the length and breadth of the state. Our organization has become a leading advocate for a just clean energy transition at the legislature, at the Public Utilities Commission, and in the public sphere generally. The question we hear most often from members who live in Northern Minnesota, however, is when promised employment and economic opportunities will show up in their neck of the woods.

Our members are frankly tired of seeing clean energy projects funded through their utility bills built hundreds of miles away, even as they hear about plans to shut down facilities like the Boswell coal plant that provide local opportunity. It became clear during MP's Integrated Resource Plan stakeholder process, that our members are not alone in their concern or their frustration. Many MP customers want to see evidence that the clean energy transition will involve investments inside the service territory that create jobs for them, and not just workers who live hundreds or thousands of miles away.

MP's proposal is directly responsive to the Commission's call for proposals that meet system requirements while supporting economic recovery and advancing environmental and equity goals. The project would create high-quality jobs this year to assist in the state's economic recovery from the devastating effects of the COVID-19 virus. Finally, it would do so at a cost that will not create any meaningful burden for ratepayers, and that is consistent with costs for similar projects based on the information provided by MP in response to Commissioner Tuma's questions.

From the perspective of LIUNA members who will pay the cost of this project, if the Commission cannot approve this investment, proposed at the Commission's request, accomplishing its objectives, and with unprecedented support, it is hard to see what investments

the Commission would approve that meet the demand to bring the clean energy revolution to the Northern Minnesotans paying the bills.

Dated: March 25, 2021

Respectfully Submitted,
LIUNA Minnesota & North Dakota

By: Kevin Pranis
Marketing Manager
81 Little Canada Road
St. Paul, MN 55117