

In the Matter of the Petition for Approval of Investments and Expenditures in the Regal Solar Project for Recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. §216B.1645 and Related Tariff Modifications.

In the Matter of the Petition for Approval of Investments and Expenditures in the Boswell Solar Project for Recovery through Minnesota Power's Renewable Resource Rider under Minn. Stat. §216B.1645 and Related Tariff Modifications

Reply Comments

PUC Docket Number: E015/M-24-343, 24-344

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to comment on the petition filed by Minnesota Power ("MP") for approval to build and operate the 85-megawatt ("MW") Boswell Solar Project in Itasca County and the 119.5 MW Regal Solar Project in Benton County, MN. LIUNA strongly supports the projects, which will bring economic opportunity to communities and workers impacted by planned retirements of coal plants while helping MP cost-effectively meet renewable and carbon-free energy generation requirements. We agree with the determination of the Department of Commerce ("Department") that the investment is in the public interest, meets applicable requirements, and is recoverable through the renewable resource rider.

LIUNA Minnesota and North Dakota represents more than 14,000 unionized construction laborers, including roughly 1,000 members who live in Northern Minnesota and rely on MP for electric service, either directly or through one of the utility's wholesale electric customers. In addition to electric service, LIUNA members rely on MP for job and career opportunities building and maintaining power generating facilities. Finally, we depend on the utility to power the mines and mills that form the backbone of the region's economy and drive the local construction industry.

We are proud of MP's leadership in the transition to lower-carbon energy sources, despite the challenges such a transition poses for members who have worked in conventional energy. At the same time, we share concerns expressed during the development of MP's current Integrated Resource Plan ("IRP") over the relatively small share of clean energy investment occurring in and around the utility's service territory. The proposed Boswell and Regal Solar projects provide an opportunity to remedy this issue by generating hundreds of jobs and millions of dollars in lease and tax revenues for MP customers and in communities served by the utility.

We agree with the Department that the investment is needed based on the utility's current IRP and that an open and competitive Request for Proposal process shows that MP's proposal is the lowest-cost option to meet the utility's requirements. We also agree that MP's proposal meets public benefit requirements found in Minn. Stat. § 216B.1691, subd. 9 (a). Specifically, Boswell and Regal Solar will create hundreds of jobs for union trades, potentially including many LIUNA

members who have made their living at MP's Boswell plant and Xcel's Sherco plant. LIUNA operates Minnesota's largest construction apprenticeship program, and we are committed to working with MP and the utility's designated Engineering, Procurement and Construction contractor/s to maximize the project's benefits by providing employment and career opportunities to workers displaced by plant retirements and to communities that have historically been underrepresented in the energy utility sector.

Finally, we recommend that any cost cap imposed by the Commission recognize not only the impact of potential tariffs, but also the broader volatility around markets for components, materials and construction services required to build utility-scale infrastructure. We agree that MP should bear the burden to prove that costs are reasonable and prudent, but urge the Commission not to hold the utility to a different standard than has been applied to utilities in other recent cases.

We thank the Commission for its consideration and look forward to participating in this docket.

Dated: February 24, 2025

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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