



**LIUNA Minnesota and North Dakota Comments on the Proposed Byron Solar Project
PUC Docket Numbers: IP-7041/CN-20-764**

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to offer comments on EDF Renewables’ up to 200 MW Byron Solar Project, LLC, in Olmsted and Dodge Counties, Minnesota. LIUNA represents more than 13,000 unionized construction laborers and 15,000 family members statewide, including many that live in Olmsted and Dodge Counties. We believe that the project will deliver net public benefits and meets the Certificate of Need (“CN”) criteria laid out in state statute and rule.

Byron Solar will meet rapidly growing demand for solar power from Minnesota’s investor-owned, cooperative and municipal utilities, as well as customers across the Midcontinent Independent System Operator (“MISO”) system. The Commission recently approved Xcel Energy’s Integrated Resource Plan, which requires the utility to add 1,600 megawatts (“MW”) of solar generation by 2026, while Minnesota Power and Otter Tail Power have also proposed new solar acquisitions. Generation and transmission cooperatives and authorities that serve municipal utilities are also actively pursuing solar acquisitions.

Currently demand for solar power exceeds the local supply of projects that are both economic and feasible to build. Byron Solar is one of few proposed solar installations with an interconnection agreement in place. which makes the project not just needed but essential to meet state, utility and corporate clean energy goals. While Byron does not yet have a Power Purchase Agreement, we can be confident based on the state of the market that need will not be better met by an alternative facility or type of facility. The success of the project in securing land and an interconnection agreement also supports the case that the proposal is needed and will help ensure availability of cost-effective solar electricity in the market.

The Byron Solar project will benefit Minnesota utility ratepayers by increasing the supply of solar energy whether the energy is ultimately sold to a regulated utility, co-op, or purchaser elsewhere in MISO territory. Equally important, the project will create high-quality job and career opportunities for a hundred or more local residents who are expected to be employed during construction. EDF has a history of partnering with unions such as ours to maximize local economic and employment benefits of renewable energy projects, and has indicated that the company intends to do so on this project. We urge the Commission to issue a CN for the project.

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Respectfully Submitted,
LIUNA Minnesota & North Dakota

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