

**In the Matter of the Application of Xcel Energy for a Certificate of Need, Site Permit,
Transmission Line Route Permit, and Pipeline Route Permit for the Lyon County
Generating Station in Lyon County, Minnesota**

Scoping Comments

**PUC Docket Numbers: E002/CN-25-145; G002/GS-25-154; E002/TL-25-161;
G002/GP-25-163**

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to comment on the applications submitted by Xcel Energy (“Xcel”) for a Certificate of Need, Site Permit, Transmission Line Route Permit, and Pipeline Route Permit for the construction of the Lyon County Generating Station and associated infrastructure.

We believe that the Minnesota Public Utilities Commission (“Commission”) has already conducted a thorough evaluation of alternatives to the proposed facility through dockets evaluating Xcel’s request for proposals for firm dispatchable resources, where the Lyon County was selected along with a set of wind, solar and battery storage projects; and Xcel’s most recent Integrated Resource Plan proceeding which identified the Lyon County project as a necessary system resource.

In terms of evaluating impacts, we would recommend that, in addition to the energy, environmental and human impacts that have traditionally been studied, the EIP staff take a close look at the impact of the project on local employment and economic development impacts as directed by the legislature in Minn. Stat. § 216I.05, Subd. 7, which specifically requires:

(14) evaluation of the proposed facility's impact on socioeconomic factors; and

(15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts, and may reject or place conditions on a site or route permit based on the local employment and economic impacts. (Minn. Stat. § 216E.03, Subd. 7)

We expect the proposed project to create significant construction employment and career opportunities in Southwest Minnesota that will help to expand the skilled workforce needed to build and maintain the region’s growing energy infrastructure, which is becoming as much of a mainstay for the state’s energy system as Central Minnesota has been for generations.

Dated: August 27, 2025

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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