

Written Public Comments Received on the
Scope of the Environmental Assessment for the
Plummer Solar Project
Docket No. GS-22-451

Labor Unions

1. International Brotherhood of Electrical Workers Local Union 1426
2. International Union of Operating Engineers, Local 49
3. Laborer's International Union of North America (Minnesota & North Dakota)
4. Minnesota Tribal Contractors Council

General Public

None.

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS

LOCAL UNION NO. 1426

AFL-CIO

AFFILIATED WITH
NORTH DAKOTA AFL-CIO
NORTH DAKOTA STATE ELECTRICAL WORKERS COUNCIL
NORTHERN VALLEY LABOR COUNCIL

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MINNESOTA IBEW STATE COUNCIL
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Ms. Jessica Livingston
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Dear Ms. Jessica Livingston,

I am writing to support the proposed Plummer Solar Project, a groundbreaking endeavor that promises to significantly contribute to the advancement of clean energy and economic prosperity in Minnesota.

The Plummer Solar Project, with its 130MW photovoltaic solar facility, represents a crucial step towards achieving clean energy targets. As outlined in the comprehensive overview provided, the project is not only aligned with federal and state policies but also with key initiatives such as Executive Order 14008 and the United States Inflation Reduction Act. By promoting renewable energy development and aiming for carbon pollution-free electricity, the project plays a pivotal role in addressing the clean energy goals set forth by various governmental initiatives.


Furthermore, the environmental considerations undertaken in the development of the project are commendable. The careful selection of the site, alongside existing industrial facilities and away from residential areas, demonstrates a commitment to minimizing environmental impact. By avoiding disturbance to public lands, sensitive areas, and wildlife habitats, the project ensures the preservation of Minnesota's natural heritage while contributing positively to soil health and agricultural potential.

Economically, the Plummer Solar Project holds significant promise for the state of Minnesota. Through job creation, leveraging local expertise, and supporting businesses and workforces, the project stimulates economic growth within local communities. The anticipated employment opportunities, particularly during the construction phase, coupled with increased demand for goods and services, underscore the project's potential to generate lasting benefits for Tribes and communities alike.

In conclusion, the Plummer Solar Project is a shining example of sustainable development. Its positive impact on clean energy, environmental conservation, and economic empowerment cannot be overstated. Therefore, I urge you to lend your full support to the project with a Project Labor Agreement (PLA) as it navigates the regulatory process.

Thank you for considering my perspective, and please do not hesitate to reach out if you require any further information or assistance regarding the Plummer Solar Project.

Warm regards,


Jeremy Denault
Business Manager
IBEW L.U. 1426

INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL NO. 49, 49A, 49B, 49C, 49D, 49E, 49L
MINNESOTA • NORTH DAKOTA • SOUTH DAKOTA

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To: Minnesota Public Utilities Commission (MN PUC)
From: Nathaniel Runke- Regulatory & Political Affairs Coordinator,
Int'l Union of Operating Engineers, Local 49
Date: June 12, 2024
RE: Docket Number. **IP7103/GS-22-451**

In the Matter of the Application of Enbridge Solar (Plummer), LLC for a Site Permit for the up to 130 MW Plummer Solar Project in Red Lake County, MN

On behalf of the over 15,000 heavy equipment operating engineers represented by the International Union of Operating Engineers, Local 49 ("Local 49") across Minnesota, North Dakota, and South Dakota, I am thankful for the opportunity to comment in support of Enbridge Solar's proposed up to 130-megawatt Plummer Solar project ("project").

Enbridge has agreed to utilize local union labor for this project. This agreement and Enbridge's longstanding tradition of using local contractors and union labor is another example that the growth of renewable energy generation projects can benefit their host communities and local workforce through family sustaining jobs and increased tax revenue.

Along with the local equity considerations in this agreement, Enbridge Solar has also committed to use best efforts to support and deploy Native American, veteran, and diverse businesses and workforces for the project. Local 49 and our signatory contractors share these aims and strive to diversify and grow our membership across Minnesota through numerous targeted efforts. Our Operating Engineer Pathway in the OE High School Pathway Program is available to all Minnesota high school students. This 4-course virtual high school curriculum works to create opportunities for students to learn about a career as an Operating Engineer both in classrooms and in-the-field settings. Local 49 also co-administers the Building Strong Communities (BSC) Program, a multi-trade apprenticeship preparatory program. Over 80% of BSC program participants are women and/or from BIPOC communities. Women Building Success, of which our Local 49 Women's group is a partner, financially sponsors female candidates through the Building Strong Communities program. Finally, we work in partnership with Five Skies Training Program and Indigenous Communities to build pathways to careers in our industry.

These local and diverse job opportunities are one reason that large-scale solar projects must continue to be a major component of Minnesota's renewable energy future. The oversight

provided, opportunity for community involvement, and emphasis on a project's benefit to its host community allows these projects to maximize their value to Minnesota and its residents. They ensure that energy transition efforts incorporate employment opportunity, affordable and sustainable energy supply, and a cleaner environment for all Minnesotans.

The project will provide many positive human impacts. One of which is the creation of 150-200 job opportunities for Minnesota's highly skilled energy infrastructure construction workforce during construction and installation. These jobs will provide family-sustaining wages and benefits, and all parties involved are committed to ensure that the workforce for this project is diverse and equitable. The use of local union labor will ensure more socio-economic benefits stay within the local economy and Minnesota tax base. Finally, the project will increase the property and production tax contributions, which will also benefit the region.

On top of all these socio-economic benefits this project does not require the construction of additional transmission lines, which is a major advantage over similar projects. The project aligns with federal and state policies, utility resource plans, and clean energy goals. The project will also provide the potential to improve soil quality and other environmental benefits through its use of deep-rooted native vegetation on the project site.

We would ask that the environmental assessment consider the benefits provided by the project described above.

Thank you for your time and consideration.



Nathaniel J Runke
Regulatory & Political Affairs Coordinator
International Union of Operating Engineers, Local 49

**Comments on the Application of Enbridge Solar (Plummer), LLC for a Site Permit for the
up to 130 MW Plummer Solar Project in Red Lake County, MN**

MPUC Docket No. IP7103/GS-22-451

LIUNA Minnesota and North Dakota appreciates the opportunity to offer comments on scoping for environmental review of the application by Enbridge Solar LLC (“Plummer Solar”) for approval of a certificate of need and site permit and for the proposed 130 MW Plummer Solar project. We believe that the project offers potentially significant environmental and socioeconomic benefits.

LIUNA Minnesota and North Dakota represent more than 14,000 unionized construction workers statewide, including many that live in and around the communities where Plummer Solar would be built. The creation of high-quality construction jobs is not the primary objective of energy policy in Minnesota, but it is an important factor to consider, especially in a rural area of Minnesota where the availability of family-supporting blue-collar jobs is very limited.

In past years, we have seen some renewable energy projects generate controversy by relying heavily on an out-of-state construction workforce or by creating low quality jobs, while others have delivered substantial economic benefits to local communities. Fortunately, Enbridge Energy has committed to work with organized labor to maximize the local socioeconomic benefits of clean energy development, so we are confident that this project will prioritize creation of family-supporting job opportunities for local workers.

We hope that the Environmental Analysis will consider the following:

- How this project’s interconnection status could maximize the likelihood of success and provide a source of clean energy and associated economic development that may not be available to projects that lack strong queue positions.
- How the proposed addition of battery storage could maximize the economic and energy benefits of the project while helping to ease transmission congestion.
- How the creation of family-supporting construction jobs and career opportunities could benefit local workers and communities over the long term.

We thank the Commission for your consideration.

Dated: June 13, 2024

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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



June 12, 2024

Jessica Livingston
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

Re: Docket Number: IP7103/GS-22-451

Dear Minnesota Department of Commerce:

We are writing in this letter in support of Enbridge's Plumber Solar Project located in Emardville Township in Red Lake County, Minnesota. The Minnesota Tribal Contractors Council (MnTCC) is a non-profit organization and our mission is to support Native American contractors and businesses. We do this by hosting events throughout the year to bring together Indigenous contractors, companies and the workforce along with non-native businesses and industry leaders in Minnesota in efforts to connect, build professional relationships and ultimately do business together in the future. Our goal is to help bring awareness of projects such as the proposed Plumber Solar Project to our communities and support the Native workforce so they can be a part of the projects that come through our communities all around Minnesota.

MnTCC supports the Enbridge Plummer Solar Project as it will create tribal job opportunities for tribal members, as this project is close to Red Lake reservation and falls into the 1863 ceded territory. We also support this project because:

- The project will use best efforts to endeavor to support and deploy union, Tribal, local, veteran, and diverse businesses, and workforces.
- Tribes and local Minnesota communities will benefit from increased demand for goods and services needed to support construction and ongoing operations.
- Enbridge has a long track record of creating everlasting relationships with communities, as MnTCC and our members have witnessed with other communities in Minnesota.

We appreciate your time in reading this letter and allowing us to express our support for the Plumber Solar Project. We believe this project can help transition towards our clean energy goals and support local businesses, communities, families and individuals.

Miigwech,

Morgan Fritzinger

Morgan Fritzinger
Executive Director



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