



Comments from LIUNA Minnesota and North Dakota

July 9, 2025

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

In the Matter of Wisconsin Power & Light Company's Site Permit Application for a Large Wind Energy Conversion System of up to 153 MW in Freeborn County, Minnesota (MPUC Docket No. IP-7145/WS-24-349)

Dear Mr. Davis,

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to submit comments to the Minnesota Department of Commerce Energy Environmental Review and Analysis unit ("EERA") on the scope of the Environmental Assessment that EERA staff will prepare for the 153 megawatt ("MW") Bent Tree North Wind project proposed by Wisconsin Power and Light ("Alliant").

Bent Tree North has potential to deliver significant energy and socioeconomic benefits to Southeast Minnesota, including high-quality jobs and construction career opportunities for local workers. In recently-enacted legislation, including laws requiring 100% clean power and streamlining permitting, Minnesota legislators have made clear that the permitting process for large energy projects approved by the Minnesota Public Utilities Commission ("Commission") should prioritize the creation of high-quality jobs and career opportunities for local workers with a focus on construction, specifically adding the following criteria for consideration:

(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)

The statutory language requires that the Environmental Assessment consider the likely employment and other socioeconomic impacts of an actual project, not merely the hypothetical impacts of a hypothetical project of the same size and scope, just as the document must consider the likely environmental impacts of a specific project not hypothetical impacts. It is worth noting that the legislature has specifically authorized the Commission to reject or place conditions on a permit solely based on these impacts, so it is critically important to get this question right.

In the application, Alliant has indicated that the company will bid the project with a preference for contractors that utilize local union labor to the greatest extent feasible, that the company's Balance of Plant contractor will work with area unions to maximize local hiring and economic benefits.

The BOP contractor selected will be required to work with labor unions, local subcontractors, and other vendors to implement a Project construction staffing model that maximizes local hiring and local economic benefits for the Project, while ensuring the Project is safely built on time and on budget. (P. 27)

We believe that Alliant's plan to rely on local union labor will help to ensure that the project meets the socioeconomic test described above. We can attest based on our past experience with similar area wind energy projects such as Mower Wind that sufficient skilled workforce is available to meet the bulk of labor demand, supplemented by specialized workforce supplied by the BOP contractor.

EERA can further help to inform the Commission's consideration in this docket by documenting the degree to which past wind energy projects have successfully employed majority-local workforce. EERA can also draw on a substantial body of research that specifically addresses the socioeconomic impacts of local construction jobs created by large-scale renewable energy projects, some of which is available at LocalJobsNorth.org. We are also happy to help fill in gaps based on our expertise in this area.

We thank EERA for its consideration.

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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