

**Comments on the Proposed Northern Wind Repower Project**  
**PUC Docket Numbers: IP-6646/WS-09-584**

LIUNA Minnesota & North Dakota appreciates the opportunity to offer comments on Xcel Energy proposal to repower the 201 MW Nobles Wind Farm in Nobles County, Minnesota. We urge the Commission to approve the proposed site permit amendment based on the significant consumer, environmental, and local economic benefits of the project

LIUNA Minnesota & North Dakota represent 12,000 unionized construction workers statewide including many workers in and around Nobles County. We believe that the proposed wind repower project can benefit both our members and the public at large by creating and sustaining high-quality construction and maintenance jobs.

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. These concerns are especially important in light of the widespread unemployment caused by the COVID-19 global pandemic. Minnesota construction workers are hurting and urgently need good work opportunities.

LIUNA appreciates Xcel's expressed commitment to utilize local union workforce for the Nobles Repower Project. The union wages and benefits earned on wind energy projects make a significant contribution to the well-being of local workers, families, and communities. For example, the typical LIUNA member employed on a new 200 MW wind project could log 1,500 work hours, which translates into nearly \$40,000 in taxable wages, over a year of family medical coverage, and more than \$7,000 in pension contributions.

The local economic benefits that are generated when local union workers are employed to build wind energy projects can be significant and long-lasting. With overtime, the wages earned working on a big project exceed the wages most blue-collar workers can earn locally. A job on such a project can create enough wealth to make a down-payment on a house or buy a new car. For building trades members who are also farmers or ranchers, it's the kind of outside income that can help keep the wolves from the door in a tough year.

Repowering projects such as this one have the potential to create hundreds of high-quality construction jobs for Minnesota workers while extending the economic benefit of local lease and property tax payments. Further, the potential to repower wind generation infrastructure that is nearing the end of its useful life makes the assets more valuable, and therefore makes investments in new wind energy generation more attractive to developers and investors. Finally, repower projects have the advantage of minimizing the environmental and human disruption associated with new development and construction.

For these reasons, we would urge the Commission to take a flexible approach when applying siting criteria and permit conditions to this and similar projects, recognizing that redeveloping a brownfield site may necessitate adjustment to setback or other requirements. Repowering projects have the potential to create hundreds of high-quality construction jobs for Minnesota workers while extending the economic benefit of local lease and property tax payments. The potential to repower wind generation infrastructure that is nearing the end of its useful life also makes such assets more valuable, and therefore makes investments in new wind energy generation more attractive to developers and investors.

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Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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