

September 13, 2019

Via Electronic Filing

Mr. Daniel Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: IP-6981/CN-17-306  
In the Matter of the Application of Dodge County Wind, LLC for a Certificate of  
Need for the 170 MW Dodge County Wind Project and Associated Facilities in  
Dodge, Steele, and Olmsted Counties, Minnesota**

**IP-6981/WS-17-307  
In the Matter of the Application of Dodge County Wind, LLC for a Site Permit for  
the 170 MW Dodge County Wind Project and Associated Facilities in Dodge and  
Steele Counties, Minnesota**

**IP-6981/TL-17-308  
In the Matter of the Application of Dodge County Wind, LLC for a Route Permit  
for the 345 kV High-Voltage Transmission Line Associated with the Dodge County  
Wind Project in Dodge and Olmsted Counties, Minnesota**

Dear Mr. Wolf,

On September 5, 2019, the Laborers District Council of Minnesota and North Dakota (“LIUNA”) filed a Request to Consider Motions to Compel, specifically requesting the Commission rule on the administrative law judge’s denial of LIUNA’s Motion to Compel. While Dodge County Wind, LLC (“DCW”) continues to view LIUNA’s Motion to Compel as without merit, it files an update to Attachment 2 to DCW’s July 26, 2019 response in order to provide an updated projection on the use of local labor. The red lettering is the updated information.

Respectfully Submitted,

/s/ Brian J. Murphy

---

Brian J. Murphy  
Managing Attorney  
NextEra, Energy Resources, LLC  
700 Universe Blvd.  
Juno Beach, FL 33408  
(561) 694-3814  
Brian.J.Murphy@nee.com

## Attachment 2

### Part A

The information contained in the Part A chart represents an estimate of the breakdown of local vs. non-local workers based solely on an indicative project in rural Minnesota and solely on general experience and not any specific data or information. Therefore, the information contained in Part A cannot be relied on as a representation of who DCW or a prospective General Contractor or associated subcontractors will or will not hire for the DCW wind and transmission projects. The actual values will likely not be the same, as actual hiring by the General Contractor and subcontractors will not occur until the early **Spring of 2021**, and even after that hiring values change during construction to maintain staffing depending on construction progress.

\* Note: "Local" has been assumed to include any worker of the Contractor or their subcontractors that live in MN or within 150 miles of project site.

Labor Type	Average Headcount	Peak	Approx Source Location	
			Non-Local	Local *
<b>Windfarm</b>				
Laborers	50-60	65	70%	30%
Equipment Operators	30-35	30	20%	80%
Crane Operators	5-10	12	20%	80%
Electricians	40-50	52	25%	75%
Supervision/Management	25-30	30	40%	60%
<b>Transmission</b>				
Equipment Operators	3-4	4	30%	70%
Crane Operators	1-2	1	50%	50%
Electricians	20-25	25	60%	40%
Supervision/Management	3-5	5	100%	0%

### Part B

The information contained in the Part B chart represents an estimate of the breakdown in Contractor's and their subcontractor's workers already employed vs. those new hires that would be sourced through a combination of local job fairs, advertising and existing labor affiliations based solely on general experience. Therefore, the information contained in Part B cannot be relied on as a representation of who DCW or a prospective General Contractor or associated subcontractors will or will not hire for the DCW wind and transmission projects. The actual values will likely not be the same, as actual hiring by the General Contractor and subcontractors will not occur until the early **Spring of 2021**, and even after that hiring values change during construction to maintain staffing depending on construction progress. It is also to be expected that established contractors already have existing workers employed and that only some portion of their peak crews will need to be augmented with new hires. Most of these new hire positions are not committed beyond the construction period of a project.

Labor Type	Average Headcount	Peak	Approx Employment status	
			Existing	New Hire
<b>Windfarm</b>				
Laborers	50-60	65	70%	30%
Equipment Operators	30-35	41	20%	80%
Crane Operators	5-10	12	20%	80%
Electricians	40-50	52	25%	75%
Supervision/Management	25-30	30	90%	10%
<b>Transmission</b>				
Equipment Operators	3-4	4	50%	50%
Crane Operators	1-2	1	100%	0%
Electricians	20-25	25	80%	20%
Supervision/Management	3-5	5	90%	10%

**General Note:**

Part A and Part B are not intended to relate in their values, any similarities are coincident. Likewise any interpretation derived from combining the values from Part A and Part B is not intended and can lead to false assumptions. These are simply 2 separate topics, each attempted to be answered separately.

**Subcontractors / Material Suppliers**

DCW expects to use a general contractor that intends to staff and supply the project as follows: All electrical construction workers on the collection system and substation will be from the local International Brotherhood of Electrical Workers. All operating engineers on cranes and hauling will be from the local International Union of Operating Engineers. In addition to the union workforce, all concrete ready-mix, road building subcontractors, and the O&M building will be through contracts with local Minnesota businesses. DCW further clarifies that although an engineering, procurement, and construction contractor has not been contracted with at this time, DCW commits to use reasonable efforts to employ no less than 60% local labor during construction, with local labor defined as residing within Minnesota or within 150 miles of the project. DCW understands that the commitment to use reasonable efforts to employ no less than 60% local labor during construction is slightly more than the percentages originally estimated in the table in Part A above.

**STATE OF MINNESOTA  
BEFORE THE  
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner
Valerie Means	Commissioner

In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need for the Dodge County Wind Project and Associated Facilities in Dodge, Steele, and Olmsted Counties, Minnesota

MPUC Docket No.  
IP-6981/CN-17-306

In the Matter of the Application of Dodge County Wind, LLC for a Site Permit for the Dodge County Wind Project and Associated Facilities in Dodge and Steele Counties, Minnesota

MPUC Docket No.  
IP-6981/WS-17-307

In the Matter of the Application of Dodge County Wind, LLC for a Route Permit for the 345 kV High-Voltage Transmission Line Associated with the Dodge County Wind Project in Dodge and Olmsted Counties, Minnesota

MPUC Docket No.  
IP-6981/TL-17-308

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of **Dodge County Wind, LLC’s update to Attachment 2 to its July 26, 2019 response to The Laborer’s District Council of Minnesota and North Dakota’s Motion to Compel** has been served today by e-mail and/or U.S. Mail to the following:

Name	Email/Address	Delivery Method
Generic – Commerce Attorneys	<a href="mailto:commerce.attorneys@ag.state.mn.us">commerce.attorneys@ag.state.mn.us</a>	Electronic
Jason Czczok	<a href="mailto:office@byronfuneralhome.com">office@byronfuneralhome.com</a>	Electronic
Brenda Davis	<a href="mailto:Bdavis.asset@gmail.com">Bdavis.asset@gmail.com</a>	Electronic

Name	Email/Address	Delivery Method
Melissa DeVetter	<a href="mailto:melissa.devetter@co.dodge.mn.us">melissa.devetter@co.dodge.mn.us</a>	Electronic
Generic – Residential Utilities	<a href="mailto:residential.utilities@ag.state.mn.us">residential.utilities@ag.state.mn.us</a>	Electronic
Dennis Edgar	66441 240th Ave Kasson, MN 55944	Paper
Sharon Ferguson	<a href="mailto:sharon.ferguson@state.mn.us">sharon.ferguson@state.mn.us</a>	Electronic
Andrew Gibbons	<a href="mailto:andrew.gibbons@stinson.com">andrew.gibbons@stinson.com</a>	Electronic
Katherine Hinderlie	<a href="mailto:katherine.hinderlie@ag.state.mn.us">katherine.hinderlie@ag.state.mn.us</a>	Electronic
Linda Jensen	<a href="mailto:linda.s.jensen@ag.state.mn.us">linda.s.jensen@ag.state.mn.us</a>	Electronic
Peter Madsen	<a href="mailto:peter.madsen@ag.state.mn.us">peter.madsen@ag.state.mn.us</a>	Electronic
Brian Meloy	<a href="mailto:brian.meloy@stinson.com">brian.meloy@stinson.com</a>	Electronic
James Mortenson	<a href="mailto:james.mortenson@state.mn.us">james.mortenson@state.mn.us</a>	Electronic
Brian J. Murphy	<a href="mailto:Brian.J.Murphy@nee.com">Brian.J.Murphy@nee.com</a>	Electronic
Carol A. Overland	<a href="mailto:overland@legalelectric.org">overland@legalelectric.org</a>	Electronic
Gene Peters	<a href="mailto:gpete1951@aol.com">gpete1951@aol.com</a>	Electronic
Tom Rother	<a href="mailto:tomr@netmanco.com">tomr@netmanco.com</a>	Electronic
Janet Shaddix Elling	<a href="mailto:jshaddix@janetshaddix.com">jshaddix@janetshaddix.com</a>	Electronic
Mike Weich	<a href="mailto:Mike.Weich@nexteraenergy.com">Mike.Weich@nexteraenergy.com</a>	Electronic
Edward Westin	<a href="mailto:eawestin@hotmail.com">eawestin@hotmail.com</a>	Electronic
Daniel P. Wolf	<a href="mailto:dan.wolf@state.mn.us">dan.wolf@state.mn.us</a>	Electronic

Dated this 13th day of September, 2019

*/s/ Joshua M. Feit*

\_\_\_\_\_  
Joshua M. Feit