



**In the Matter of the Application of Lemon Hill Solar, LLC for a Site Permit for the up to 180 MW Lemon Hill Solar Project in Olmsted County, Minnesota**

**Docket No. IP-7156/GS-25-126**

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity provided by the Minnesota Public Utilities Commission ("Commission") to offer supplemental comment on the application of Ranger Power LLC ("Ranger") for Site Permits for development of an up to 180-megawatt ("MW") solar generation project in Olmsted County. We believe that the project has the potential to deliver significant economic and energy benefits to LIUNA members and other residents of Southeast Minnesota.

We agree with comments filed by the Commission's Energy Infrastructure Permitting ("EIP") staff which conclude that the application is substantially complete. We similarly have not identified any contested issues of fact that would require a Contested Case Hearing, and we do not recommend that the Commission appoint an advisory task force. Like EIP, we have identified areas where the record will need further development, and we believe that can best be accomplished by initiating an informal proceeding.

We appreciate the stated intention of Ranger and parent company D.E. Shaw Renewable Investments, LLC ("DESRI") to maximize employment opportunities for local construction workers on the project, potentially in partnership with local unions such as LIUNA. At the same time, additional details will be needed in order for the Commission to adequately evaluate the project's "local employment and economic impacts" as required by Minn. Stat. § 216E.03, Subd. 7(b)(15).

For example, the project's socioeconomic impacts could vary significantly depending on whether the contractor selected to build the project partners with local labor unions with a proven track record of recruiting, training and dispatching skilled local workers for similar large energy infrastructure projects or instead opts to work with alternative "local vendors" that may or may not have comparable experience and capabilities. We also note that there is extensive evidence to support the feasibility of building large solar projects in Minnesota using a workforce that is over 80% local (and not just for the "basic infrastructure and site development" phase) that has been achieved through partnerships between developers, their Engineering, Procurement and Construction ("EPC") contractors, and local construction unions.

We look forward to working with Ranger and DESRI to help flesh out the construction plan and demonstrate that utilization of local workforce and apprenticeship programs are consistent with projects built safely, on-time and on-budget. We thank Commissioners for their thoughtful consideration.

Dated: August 5, 2025

Respectfully Submitted,

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