

August 28, 2025

**Via Electronic Filing**

The Honorable Megan J. McKenzie  
Office of Administrative Hearings  
600 North Robert Street  
P.O. Box 64620  
Saint Paul, MN 55164-0620

Mr. Mike Bull  
Acting Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
Saint Paul, MN 55101-2147

Re: ***In the Matters of the Applications of Benton Solar, LLC for Site Permits for the 100 MW Solar Energy Generating System and 100 MW Battery Energy Storage System and a Route Permit for the 115 kV High-Voltage Transmission Line Associated with the Benton Solar Project***

**OAH Docket No. 25-2500-40508**

**MPUC Docket Nos. IP7115/GS-23-423; IP7115/TL-23-425; and IP7115/ESS-24-283**

Dear Judge McKenzie and Mr. Bull:

Benton Solar, LLC (“Benton Solar”) respectfully submits for filing Benton Solar’s Supplemental Response to LIUNA Minnesota & North Dakota’s Third Information Request (“Supplemental Response”). The Supplemental Response was admitted as Exhibit Nos. 167 and 168 at the Evidentiary Hearing on August 28 on behalf of Benton Solar.

The Supplement Response was admitted as two exhibits because it contains Protected Data. Exhibit No. 168 contains the information in the Supplemental Response that is Protected Data. The Protected Data were provided pursuant to, and are subject to the terms and protection of, the March 21, 2025 Protective Order entered by Judge McKenzie. Consistent with the Protective Order, Benton Solar has marked each page with “NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE.”

In Exhibit 167, the same Protected Data are redacted. The portion of Exhibit 167 that contains the redacted Protected Data has been labeled “PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED.”

For clarity, Attachments A & B to the Supplemental Response do not contain confidential or trade secret information and are only provided in public format and are in Exhibit 167.

The Honorable Megan J. McKenzie  
Mr. Mike Bull  
August 28, 2025  
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Please feel free to contact me with any questions.

Sincerely,

**Stinson LLP**

*/s/ Claire M. Williams*

Claire M. Williams

CMW/mp

Enclosures

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

**Benton Solar (IP7115/GS-23-423, ESS-24-283, TL-23-425; OAH 25-2500-40339)  
Request #3**

**RE: Local Workforce Recruitment**

Please provide the following information for each utility-scale wind and solar energy facility built or repowered by NextEra Energy Resources and/or the Company's affiliates in Minnesota and North Dakota between 2019 and 2025. For the purposes of this request, "local workers" and "local construction workforce" includes individuals domiciled in the state where the project is located or within 150 miles of the project location.

**Request LIUNA 3-1**

Please provide a detailed description of efforts made by the Company, first-tier contractors and subcontractors to recruit local construction workforce, including but not limited to:

- a. Recruitment events - Please include detail on event types, dates, location, advertising/promotion, number of attendees, and number of attendees that secured employment on the project
- b. Locally-targeted advertisements and job postings - Please include names of publications/websites, dates, ad/posting copy, number of applicants, and number of applicants that secured employment on the project
- c. Outreach to registered apprenticeship programs serving the area -

**Response to LIUNA 3-1:**

Benton Solar objects to this request to the extent it is overbroad, unduly burdensome, vague or ambiguous, seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket, and seeks information that is not within the possession or control of Benton Solar or its affiliates. Benton Solar interprets this request and references to "Company" to seek information regarding NextEra Energy Resources, LLC's ("NextEra") efforts to recruit local workers. Without waiving these objections, Benton Solar responds as follows:

As a general matter, NextEra hires an engineering, procurement, and construction ("EPC") contractor to oversee the construction of its solar and wind projects. As a result, the EPC contractor, rather than NextEra, hires the incremental workers required to staff project construction needs. Because the contractors are responsible for hiring, NextEra does not collect or maintain information related to those practices unless it is required for compliance with local, state, or federal requirements. Notwithstanding that limitation, and without waiving any of NextEra's or Benton Solar's legal rights, objections, or defenses applicable to the requests, Benton Solar has voluntarily and in good faith communicated these requests to its prime or first tier contractors for the projects in Minnesota and North Dakota between 2019 and 2025, and requested that they provide any information they have that is responsive to the request. Except where publicly provided, the information provided in these responses reflects data voluntarily provided to Benton Solar by third parties as of the date of this response. Because this information was sourced from, and provided by, third parties, Benton Solar is unable to verify the accuracy of the information set forth in this response.

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

With respect to Request LIUNA 3 generally, Benton Solar has identified the names of the prime contractors for projects in Minnesota and North Dakota between 2019 and 2025 in the table below. Where more than one prime contractor was involved in the project, Benton Solar has indicated (in parentheses) the portion of the project for which the contractor was contracted.

Additionally, Benton Solar provides the information highlighted in grey as Protected Data subject to the March 21, 2025 Protective Order entered in this docket. Such designation indicates the responding EPC contractor provided the information in accordance with the confidentiality provisions of its Engineering, Procurement and Construction Agreement with the respective NextEra project subsidiary and requested such treatment.

Facilities in Scope	City	State	Prime Contractor
FPL Energy Mower County (Wind Repower)	Mower	MN	White Construction
Walleye Windfarm	Beaver Creek	MN	Blattner Energy, Inc. (wind)
			Michels Power, Inc. <sup>1</sup> (substation)
Buffalo Ridge Wind - I	Lake Benton	MN	Blattner Energy, LLC, fka Blattner Energy, Inc. (wind)
			M.J. Electric, LLC (“MJE”) (substation)
Lake Benton Wind - II	Lake Benton	MN	Blattner Energy, Inc. (wind)
Northern Divide Wind Energy Center	Powers Lake	ND	Blattner Energy, Inc. (wind)
			Brink Constructors, Inc. (transmission)
Oliver County Wind Energy Center - IV	Center	ND	Blattner Energy, Inc. (wind)
			Brink Constructors, Inc. (substation and transmission)
Emmons-Logan Windfarm - I	Linton	ND	Blattner Energy, Inc.
			Substation Inc. (substation)
Ashtabula Wind	Barnes	ND	Wanzek
Oliver County Wind Energy Center - I	Oliver	ND	Blattner Energy, Inc.

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<sup>1</sup> Michels Power, Inc. was formed and performed work effective January 4, 2021. All relevant work prior to that date was performed by Michels Corporation.

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

Oliver County Wind Energy Center - II	Oliver	ND	Blattner Energy, Inc.
Baldwin Repower	Burleigh	ND	Blattner Energy, Inc.
Wilton I	Burleigh	ND	Blattner Energy, Inc.
Wilton II	Burleigh	ND	Blattner Energy, Inc.

**Minnesota**

- FPL Energy Mower County (Wind Repower)

FPL Energy Mower County Wind, LLC provided information about the recruiting and advertising activities of its contractor, White Construction (“White”), in its required quarterly labor statistics filings. Please see eDockets Doc. ID No. [202011-168315-01](#) and [20212-170963-01](#).

Benton Solar has not received additional information from the EPC contractor, White, as it relates to this request.

- Walleye Windfarm

Walleye Wind, LLC provided information about the recruiting and advertising activities of its contractor, Blattner, in its required quarterly labor statistics filings. Please see eDockets Doc. ID No. [20232-193141-01](#), [20228-188339-01](#), and [202211-190655-1](#).

Benton Solar received the following response from Michels Power, Inc.:

- Michels Power, Inc. (“MPI”) did not attend recruitment events but rather relied on its keymen and the local union referral halls to fulfill its labor needs on the Walleye Wind Farm Project and does not have information regarding subcontractor recruitment efforts.*
- MPI did not attend recruitment events but rather relied on its keymen and the local union referral halls to fulfill its labor needs on the Walleye Wind Farm Project and does not have information regarding subcontractor recruitment efforts.*
- MPI utilized the apprenticeship program for self-performed work and does not have information regarding subcontractor apprenticeship usage.*

Benton Solar received the following response from its EPC contractor, Blattner, as it relates to this request.

- Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

*Union halls recruit all labor performed under a Project Labor Agreement (“PLA”) and Blattner cannot control the union’s recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area.*

**Project**

*Walleye Windfarm*

**Response**

*PLA*

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- b. *Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union’s recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner’s career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

Walleye Windfarm

PLA

- c. *Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union’s recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner’s career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

Walleye Windfarm

PLA

- Buffalo Ridge Wind – I

Buffalo Ridge Wind, LLC provided information about the recruiting and advertising activities of its contractor, Blattner, in its required quarterly labor statistics filings. Please see eDockets Doc. ID No. [20232-193140-01](#), [20228-188337-01](#), and [202211-190578-01](#).

Benton Solar received the following response from its EPC contractor, M. J. Electric:

“In all instances, as an IBEW union subcontractor, M. J. Electric (“MJE”) followed the normal dispatching practices and worked in conjunction with the local IBEW hall to provide craft labor to the projects.”

Benton Solar received the following response from its EPC contractor, Blattner, as it relates to this request.

- a. *Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area.*

**Project**

**Response**

*Buffalo Ridge Wind - I*

*PLA*

- b. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

*Buffalo Ridge Wind - I*

*PLA*

- c. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

*Buffalo Ridge Wind - I*

*PLA*

- Lake Benton Wind – II

Lake Benton Power Partners II, LLC provided information about the recruiting and advertising activities of its contractor, Blattner Energy ("Blattner"), in its required quarterly labor statistics filings. Please see eDockets Doc. ID No. [20198-155154-01](#) and [201911-157547-01](#).

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

Benton Solar received the following response from its EPC contractor, Blattner, as it relates to this request.

- a. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area.*

**Project**

**Response**

*Lake Benton Wind - II*

*PLA*

*At the beginning of the project we took the below steps to hire local workers.*

- Radio ads were run in the local region advertising the need for workers*
- Newspaper ads were run in 5 different towns/communities in the local area and on their online portal*
- Yard signs were made and posted along busy traffic areas*
- A job fair was held at the career force center with information posted on their website which went state wide as a public relations article written to gain interest in working for the project*
- A streaming banner was also posted online of the radio stations website for the career fair which received a very high impression/engagement readout performance*

- b. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

*Lake Benton Wind - II*

*PLA*

*At the beginning of the project we took the below steps to hire local workers.*



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- *Radio ads were run in the local region advertising the need for workers*
- *Newspaper ads were run in 5 different towns/communities in the local area and on their online portal*
- *Yard signs were made and posted along busy traffic areas*
- *A job fair was held at the career force center with information posted on their website which went state wide as a public relations article written to gain interest in working for the project*
- *A streaming banner was also posted online of the radio stations website for the career fair which received a very high impression/engagement readout performance*

c. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

**Project**

**Response**

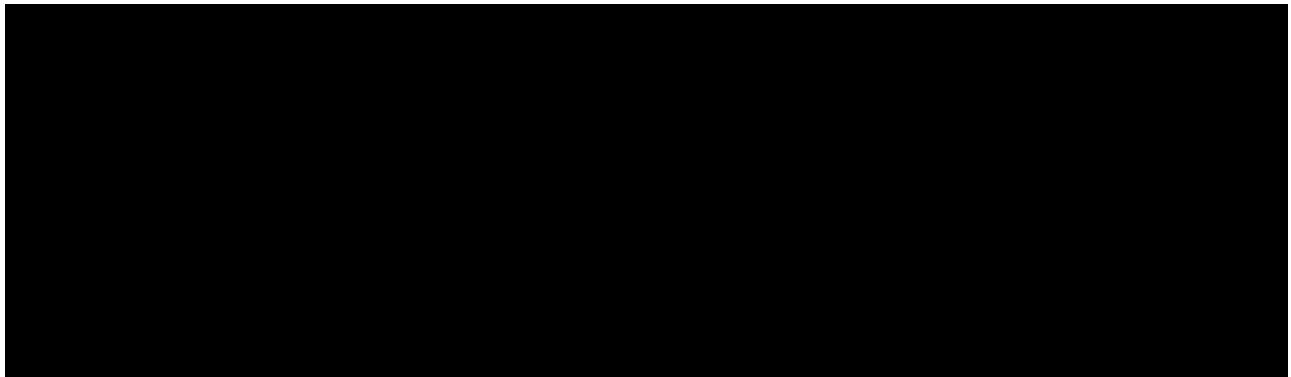
*Lake Benton Wind - II*

*PLA*

**North Dakota**

- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center

Benton Solar received the following response from its EPC contractor, Brink Constructors, Inc., related to the above two Projects:



**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

Benton Solar received the following response from its EPC contractor, Blattner, for the following projects within its scope of work:

- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center
- Emmons-Logan Windfarm – I
- Oliver County Wind Energy Center - I
- Oliver County Wind Energy Center – II
- Baldwin Repower
- Wilton I
- Wilton II

- a. *Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union’s recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area.*

<b><u>Project</u></b>	<b><u>Response</u></b>
<i>Oliver County Wind Energy Center - IV</i>	-
<i>Northern Divide Wind Energy Center</i>	-
<i>Emmons-Logan Windfarm - I</i>	-
<i>Oliver County Wind Energy Center – I</i>	-
<i>Oliver County Wind Energy Center – II</i>	-
<i>Baldwin Repower</i>	-
<i>Wilton I</i>	-
<i>Wilton II</i>	-

- b. *Based on Blattner’s reasonable review of the data in its possession, the following information is provided based on Blattner’s information and belief:*

*Union halls recruit all labor performed under a Project Labor Agreement (“PLA”) and Blattner cannot control the union’s recruitment process or policies.*

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*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

<b><u>Project</u></b>	<b><u>Response</u></b>
<i>Oliver County Wind Energy Center - IV</i>	<i>See below for job requisitions.</i>
<i>Northern Divide Wind Energy Center</i>	-
<i>Emmons-Logan Windfarm - I</i>	-
<i>Oliver County Wind Energy Center – I</i>	-
<i>Oliver County Wind Energy Center – II</i>	-
<i>Baldwin Repower</i>	-
<i>Wilton I</i>	-
<i>Wilton II</i>	-

<b><i>1086 Oliver IV Wind</i></b>	<b><i>Job Requisitions</i></b>
<i>R4514 CDL Water Truck Driver (Filled)</i>	<i>Number of Applicants: 25</i> <i>Number of Offers: 2</i>
<i>R4682 CDL Water Truck Driver (Filled)</i>	<i>Number of Applicants: 18</i> <i>Offers: 5</i>
<i>R4910 Excavator (Filled)</i>	<i>Number of Applicants: 1</i> <i>Offers: 1</i>
<i>R4982 Cranes (Filled)</i>	<i>Number of Applicants: 2</i> <i>Number of Offers: 2</i>

- c. *Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies.*

*Blattner historically did not track this information and specifics are unknown. In general, Blattner attends local job fairs, contacts local unemployment offices, and will occasionally advertise in a local area. Job postings are made to Blattner's career site and evergreen labor requests with nationwide postings (open to all candidates who are open to traveling and can work anywhere). The job postings are also sent to LinkedIn and Indeed.*

<b><u>Project</u></b>	<b><u>Response</u></b>
<i>Oliver County Wind Energy Center - IV</i>	-

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

<i>Northern Divide Wind Energy Center</i>	-
<i>Emmons-Logan Windfarm - I</i>	-
<i>Oliver County Wind Energy Center – I</i>	-
<i>Oliver County Wind Energy Center – II</i>	-
<i>Baldwin Repower</i>	-
<i>Wilton I</i>	-
<i>Wilton II</i>	-

Benton Solar did not receive a response from its EPC contractor, Wanzek, for Ashtabula Wind.

**Supplemental Response to LIUNA 3-1:**

Following the submission of Benton Solar’s initial response on June 16, 2025 (“Initial Response”), Benton Solar learned of Blattner’s attendance at a job fair in April 2024 in Bismarck, where it sought to hire local operators and laborers for Oliver Wind IV. Relevant email between Blattner representatives, along with the flyer Blattner displayed at the job fair, are attached hereto as Attachment A. Additionally, since the submission of the Initial Response, Benton Solar identified email correspondence relevant to the efforts of its EPC contractor, Brink, to hire local labor for the Oliver Wind IV project, which is attached hereto as Attachment B.

**Request LIUNA 3-2**

Please provide any analyses, data or other evidence used by the company to assess availability of qualified local construction workforce or to determine that the pool of qualified local construction labor was not sufficient to meet project needs.

**Response to LIUNA 3-2:**

Benton Solar objects to this request to the extent it is overbroad, unduly burdensome, vague or ambiguous, seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket, and seeks information that is not within the possession or control of Benton Solar or its affiliates. Benton Solar interprets this request and references to “Company” to seek information regarding NextEra Energy Resources, LLC’s (“NextEra”) efforts to recruit local workers. Without waiving these objections, Benton Solar responds as follows:

As a general matter, NextEra hires an engineering, procurement, and construction (“EPC”) contractor to oversee the construction of its solar and wind projects. As a result, the EPC contractor, rather than NextEra, hires the incremental workers required to staff project construction needs. Because the contractors are responsible for hiring, NextEra does not collect or maintain information related to those practices unless it is required for compliance with local, state, or federal requirements. Notwithstanding that limitation, and without waiving any of NextEra’s or Benton Solar’s legal rights, objections, or defenses applicable to the requests, Benton Solar has voluntarily and in good faith communicated these requests to its prime or first tier contractors for the projects in Minnesota and North Dakota between 2019 and 2025 and requested that they provide any information they have that is responsive to the request. Except where publicly provided, the information provided in these responses reflects data voluntarily provided to Benton Solar by third parties as of the date of this response. Because this information was sourced from, and provided by, third parties, Benton Solar is unable to verify the accuracy of the information set forth in this response.

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

As indicated in its response to LIUNA 3-1, Benton Solar provides the information highlighted in grey as Protected Data subject to the March 21, 2025 Protective Order entered in this docket. Such designation indicates the responding EPC contractor provided the information in accordance with the confidentiality provisions of its Engineering, Procurement and Construction Agreements with the respective NextEra project subsidiary and requested such treatment.

For ease of reference as it relates to the applicable contractors per project, please refer to the table provided at the top of this Response.

**Minnesota**

Benton Solar received the following response from its EPC contractor, M. J. Electric, for its scope of work in Buffalo Ridge Wind: “In all instances, as an IBEW union subcontractor, MJE followed the normal dispatching practices and worked in conjunction with the local IBEW hall to provide craft labor to the projects. MJE's project team did not do any other type of assessment.”

Benton Solar received the following response from M. J. Electric for its scope of work in Walleye Wind: “MPI utilized keymen as well as local union and surrounding referral halls to meet project needs.”

Benton Solar received the following response from its EPC contractor, Blattner, for the following projects within its scope of work:

- Walleye Windfarm
- Buffalo Ridge Wind – I
- Lake Benton Wind – II

*Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Projects built under a PLA are done so pursuant to the requirements of the union's collective bargaining agreement (“CBA”) and/or the PLA. Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies or their in-state vs. out-of-state labor recruitment.*

*Otherwise, Blattner historically did not track this information, and it is unknown.*

Benton Solar did not receive further information from the EPC contractor for FPL Energy Mower County (Wind Repower), White, on this request.

**North Dakota**

Benton Solar received the following response from its EPC contractor, Brink Constructors, Inc., related to the below two Projects:

- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center



Benton Solar received the following response from its EPC contractor, Blattner, for the following projects within its scope of work:

- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center

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- Emmons-Logan Windfarm – I
- Oliver County Wind Energy Center - I
- Oliver County Wind Energy Center – II
- Baldwin Repower
- Wilton I
- Wilton II

*Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Projects built under a PLA are done so pursuant to the requirements of the union's CBA and/or the PLA. Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies or their in-state vs. out-of-state labor recruitment.*

*Otherwise, Blattner historically did not track this information, and it is unknown.*

**Supplemental Response to LIUNA 3-2:**

Please see Supplemental Response to LIUNA 3-1 above.

**Request LIUNA 3-3**

Please indicate whether the Company's first-tier contractors employed any non-local workers who lacked previous experience on similar large wind or solar energy projects?

**Response to LIUNA 3-3:**

Benton Solar objects to this request to the extent it is overbroad, unduly burdensome, vague or ambiguous, seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket, and seeks information that is not within the possession or control of Benton Solar or its affiliates. Benton Solar interprets this request and references to "Company" to seek information regarding NextEra Energy Resources, LLC's ("NextEra") efforts to recruit local workers. Without waiving these objections, Benton Solar responds as follows:

As a general matter, NextEra hires an engineering, procurement, and construction ("EPC") contractor to oversee the construction of its solar and wind projects. As a result, the EPC contractor, rather than NextEra, hires the incremental workers required to staff project construction needs. Because the contractors are responsible for hiring, NextEra does not collect or maintain information related to those practices unless it is required for compliance with local, state, or federal requirements. Notwithstanding that limitation, and without waiving any of NextEra's or Benton Solar's legal rights, objections, or defenses applicable to the requests, Benton Solar has voluntarily and in good faith communicated these requests to its prime or first tier contractors for the projects in Minnesota and North Dakota between 2019 and 2025, and requested that they provide any information they have that is responsive to the request.

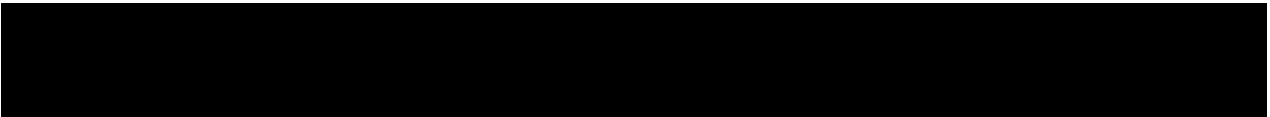
The information provided in the table below reflects data voluntarily provided to Benton Solar by third parties as of the date of this response and compiled by Benton Solar in the table below for ease of reference. Because this information was sourced from, and provided by, third parties, Benton Solar is unable to verify the accuracy of the information set forth in this response. Instances where Benton Solar did not receive a response, in whole or in part, from the contractor are indicated in the table with a dash ("-").

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

As indicated in its response to LIUNA 3-1, Benton Solar provides the information highlighted in grey as Protected Data subject to the March 21, 2025 Protective Order entered in this docket. Such designation indicates the responding EPC contractor provided the information in accordance with the confidentiality provisions of its Engineering, Procurement and Construction Agreements with the respective NextEra project subsidiary and requested such treatment.

In addition to information provided in the below table, NextEra received the following response from its EPC contractor, Brink Constructors, Inc., related to the below two Projects:

- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center




In addition to information provided in the below table, NextEra received the following response from its EPC contractor, Blattner, related to the below Projects:

- Walleye Windfarm
- Buffalo Ridge Wind – I
- Lake Benton Wind – II
- Oliver County Wind Energy Center – IV
- Northern Divide Wind Energy Center
- Emmons-Logan Windfarm – I
- Oliver County Wind Energy Center - I
- Oliver County Wind Energy Center – II
- Baldwin Repower
- Wilton I
- Wilton II

*Based on Blattner's reasonable review of the data in its possession, the following information is provided based on Blattner's information and belief:*

*Projects built under a PLA are done so pursuant to the requirements of the union's CBA and/or the PLA. Union halls recruit all labor performed under a PLA and Blattner cannot control the union's recruitment process or policies or their in-state vs. out-of-state labor recruitment.*

*Otherwise, Blattner historically did not track this information, and it is unknown.*

Facilities in Scope	City	State	Prime Contractor	3-3 –Non-Local Workers without Experience (Y/N)
FPL Energy Mower County (Wind)	Mower	MN	White Construction	-
Walleye Windfarm	Beaver Creek	MN	Blattner Energy,	

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED**

			Michels Power, Inc. <sup>2</sup> (substation)	No
Buffalo Ridge Wind - I	Lake Benton	MN	Blattner Energy, M.J. Electric, LLC (“MJE”) (substation)	In all instances, as an IBEW union subcontractor, MJE followed the normal dispatching practices and worked in conjunction with the local IBEW hall to provide craft labor to the projects. The labor force was sufficiently skilled and experienced to complete the work scope MJE was subcontracted to perform.
Lake Benton Wind - II	Lake Benton	MN	Blattner Energy,	
Oliver County Wind Energy Center - IV	Center	ND	Blattner Energy,	
			Brink Constructors, Inc. (substation and transmission)	
Northern Divide Wind Energy Center	Powers Lake	ND	Blattner Energy,	
			Brink Constructors, Inc. (transmission)	
Emmons-Logan Windfarm - I	Linton	ND	Blattner Energy,	
			Substation Inc. (substation)	
Ashtabula Wind	Barnes	ND	Wanzek	
Oliver County Wind Energy Center - I	Oliver	ND	Blattner Energy,	
Oliver County Wind Energy Center - II	Oliver	ND	Blattner Energy,	
Baldwin Repower	Burleigh	ND	Blattner Energy,	
Wilton I	Burleigh	ND	Blattner Energy,	
Wilton II	Burleigh	ND	Blattner Energy, Inc.	

<sup>2</sup> Michels Power, Inc. was formed and performed work effective January 4, 2021. All relevant work prior to that date was performed by Michels Corporation.



**Benton Solar LLC's 8.26.2025 Supplemental Response to LiUNA's Third Information Request**

**Attachment A**

---

**From:** Meier, Jay P. <jay.meier@nd.gov>  
**Sent:** Monday, March 25, 2024 10:30 AM  
**To:** Powlish, Jennifer  
**Subject:** RE: Construction & Trades Job Fair- Bismarck

[EXTERNAL]

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---

Ok, thank you! I will get you registered. I will be in touch soon with information.

---

**From:** Powlish, Jennifer <jpowlish@blattnercompany.com>  
**Sent:** Monday, March 25, 2024 10:22 AM  
**To:** Meier, Jay P. <jay.meier@nd.gov>; Powlish, Jennifer <jpowlish@blattnercompany.com>  
**Subject:** Re: Construction & Trades Job Fair- Bismarck

You don't often get email from [jpowlish@blattnercompany.com](mailto:jpowlish@blattnercompany.com). [Learn why this is important](#)

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Hello,

Yes we do, we have one starting up close to Bismarck that we will be hiring for in early April!

We are looking for local operators and laborers.

Please let me know what else you'd like to know! Happy to have a call if needed as well!  
Thank you,

Get [Outlook for iOS](#)

---

**From:** Meier, Jay P. <jay.meier@nd.gov>  
**Sent:** Monday, March 25, 2024 9:11:03 AM  
**To:** Powlish, Jennifer <jpowlish@blattnercompany.com>  
**Subject:** RE: Construction & Trades Job Fair- Bismarck

[EXTERNAL]

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---

Hi Jennifer, do you have jobs in North Dakota?

---

**From:** Powlish, Jennifer <jpowlish@blattnercompany.com>  
**Sent:** Friday, March 22, 2024 3:53 PM  
**To:** Meier, Jay P. <jay.meier@nd.gov>

Cc: Thomas, Steve <[SThomas@blattnerenergy.com](mailto:SThomas@blattnerenergy.com)>

Subject: Construction & Trades Job Fair- Bismarck

You don't often get email from [jpowlish@blattnercompany.com](mailto:jpowlish@blattnercompany.com). [Learn why this is important](#)

\*\*\*\*\* **CAUTION:** This email originated from an outside source. Do not click links or open attachments unless you know they are safe. \*\*\*\*\*

Hello, Jay.

My name is Jennifer Powlish, I am with Blattner Energy out of Avon MN. We are a utility-scale engineering, procurement and construction contractor behind some of North America's largest, most complex energy projects.

We are interested in potentially having a booth at your trades job fair in Bismarck, how do we go about getting signed up?

Thank you!

**Jennifer Powlish**

Supervisor- Talent Acquisition

**Blattner Company**

direct (320) 895-1142 | main (320) 356-7351

[www.blattnercompany.com](http://www.blattnercompany.com)

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**ENERGY**

A QUANTA SERVICES COMPANY

**Benton Solar LLC's 8.26.2025 Supplemental Response to LiUNA's Third Information Request**

**Attachment B**

---

**From:** Woodbury, Walt <Walt.Woodbury@brinkred.com>  
**Sent:** Monday, June 10, 2024 7:01 AM  
**To:** Joshua Tran; Charles Gauger  
**Subject:** Fwd: LiUNA

Caution - External Email (walt.woodbury@brinkred.com)

[Report this Email](#)

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[Tips](#)

FYI  
Walt Woodbury  
Brink Constructors President  
307-797-8834

Begin forwarded message:

**From:** "Krush, Brad" <[bkrush@brinkred.com](mailto:bkrush@brinkred.com)>  
**Date:** June 7, 2024 at 1:58:45 PM EDT  
**To:** "Woodbury, Walt" <[Walt.Woodbury@brinkred.com](mailto:Walt.Woodbury@brinkred.com)>  
**Subject:** LiUNA

Good Morning.

Brink Subcontract Manager, Brad Krush requested (3/26/2024), and was provided(4/3/2024) with a list of LiUNA Contractors to assist on Oliver IV Substation and Transmission Line. After receiving the list, Brad Krush evaluated the experience of each before sending out the bid documents and a request for quotes. We were able to commit to Stonebrook Fence on the substation, within a week of receiving the LiUNA list.

Brink has contacted MAP Mechanical for a quote to provide a Laydown Yard Operator. This subcontract is under review. Brink is looking at the risk of a non-employee operating Brink equipment and how that would be insured. We are waiting on another MAP Mechanical quote for installing and testing the transmission line anchors. Several other scopes will be considered for MAP Mechanical as the project progresses.

Brad Krush has been in direct contact with Kevin Pranis, of LiUNA, since he was made aware of LiUNA's request to help Brink with the Oliver IV project. Brad Krush has not missed a single call from Kevin Pranis or Nick Slavicek. Brad Krush has made timely replies to all emails from Nick and Kevin.

Oliver IV Substation

Site Work- Brink had verbally awarded the work to Cable Communication Services LLC.

Foundations- Brink did not have confidence with using a LiUNA Foundation Contractor on the substation foundations. Brink requested and received three LiUNA quotes to compare with our experienced

substation foundation contractors. The quotes didn't match the quantities we were seeing on the IFC drawings. Brink's entire schedule is dependent on a timely completion of the substations foundations.

Fence- At this time, we have committed to using LiUNA's Stonebrook Fence at Oliver IV Substation.

Bus Welding-LiUNA did not provide a Welding contact. The welder would need to be experienced and certified.

Fiber- We were not given a LiUNA Fiber Contractor contact to meet our requirements to complete the substation/transmission line fiber scope. Brink was provided with a one LiUNA Fiber Contractor. This contractor did not have any substation or transmission line experience. Brink depends on the Fiber Subcontractor to look beyond the IFC drawings and Bill of Material to recognize the project engineers mistakes.

Oliver IV Transmission Line

Site Work- Brink had verbally awarded the work to Cable Communication Services LLC.

Foundations- Brink awarded the work to a Tri-State Drilling, and IBEW Contractor, over a LiUNA Contractor based on schedule. Tri-State proposed a second drilling rig at a comparable price to LiUNA's single crew proposal.

Matting- Brink was not given direct contact to a LiUNA Matting provider. Brink does not subcontract to one company that intends to subcontract to another for a single scope. Newpark Matting is able to place and rent the matting directly to Brink. Brink asked Newpark if they are able to subcontract any of the work to LiUNA. They guaranteed me, the placement would be handled 100% by Newpark trained employees, per Newpark policy.

Pole Setting, Wire Crews- Self-Performed.

Thanks.

**Brad Krush**  
**Sub-Contract Manager**

2950 N. Plaza Dr. | Rapid City, SD 57702

Cell (605) 430-1365

[www.brinkred.com](http://www.brinkred.com) | [www.quantaservices.com](http://www.quantaservices.com)



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STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

---

**In the Matter of the Application of Benton  
Solar, LLC for a Site Permit for the 100  
MW Solar Energy Generating System for  
the Benton Solar Project in Benton  
County, Minnesota;**

**In the Matter of the Application of Benton  
Solar, LLC for a Site Permit for the 100  
MW Battery Energy Storage System for  
the Benton Solar Project in Benton  
County, Minnesota; and**

**In the Matter of the Application of Benton  
Solar, LLC for a Route Permit for a 115  
kV High-Voltage Transmission Line  
Associated with the Benton Solar Project  
in Benton County, Minnesota**

Docket Nos. IP7115/GS-23-423  
IP7115/TL-23-425  
IP7115/ESS-24-283

OAH Docket No.: 25-2500-40508

**CERTIFICATE OF SERVICE**

---

The undersigned hereby certifies that on August 28, 2025, a true and correct copy of *Benton Solar, LLC's Supplemental Response to LIUNA Minnesota & North Dakota's Third Information Request (Public Version – Redacted)* was electronically filed with the Minnesota Public Utilities Commission through its eDockets system and simultaneously served electronically upon the individuals attached hereto.

Dated this 28th day of August, 2025

/s/ Marci A. Phillips

Marci A. Phillips



#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-423Official CC Service List
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-423Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	23-423Official CC Service List
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5	Anthony	Garcia	anthony.garcia@edovo.com	Legacy Long Distance International Inc. dba Edovo		10833 Valley View St Ste 150 CYPRESS CA, 90630 United States	Electronic Service		No	23-423Official CC Service List
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7	Mark R.	Johnson	mark.r.johnson@nexteraenergy.com	NextEra Energy Resources		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	23-423Official CC Service List
8	Richard	Kolodziejski	rkolodziejski@ncsrcc.org	North Central States Regional Council of Carpenters		700 Olive St St. Paul MN, 55130 United States	Electronic Service		No	23-423Official CC Service List
9	Megan	McKenzie	megan.mckenzie@state.mn.us		Office of Administrative Hearings	PO Box 64620 St Paul MN, 55164 United States	Electronic Service		Yes	23-423Official CC Service List
10	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-423Official CC Service List
11	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-423Official CC Service List
12	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	23-423Official CC Service List
13	Micah	Revell	micah.revell@stinson.com	Stinson LLP		50 South Sixth St Ste 2600	Electronic Service		No	23-423Official

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2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-425Official CC Service List
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9	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	23-425Official CC Service List
10	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	23-425Official CC Service List
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13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190	Electronic Service		Yes	23-425Official

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						Richfield MN, 55423 United States				CC Service List

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2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	24-283Official CC Service List
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	24-283Official CC Service List
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5	Adam	Gracia	adam.gracia@nexteraenergy.com	NextEra Energy Resources		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	24-283Official CC Service List
6	Logan	Hicks	logan.m.hicks@state.mn.us		Department of Commerce	85 7th Place East Suite 280 Saint Paul MN, 55101 United States	Electronic Service		No	24-283Official CC Service List
7	Mark R.	Johnson	mark.r.johnson@nexteraenergy.com	NextEra Energy Resources		700 Universe Blvd Juno Beach FL, 33408 United States	Electronic Service		No	24-283Official CC Service List
8	Megan	McKenzie	megan.mckenzie@state.mn.us		Office of Administrative Hearings	PO Box 64620 St Paul MN, 55164 United States	Electronic Service		Yes	24-283Official CC Service List
9	Cezar	Panait	cezar.panait@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	24-283Official CC Service List
10	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	24-283Official CC Service List
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13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190	Electronic Service		Yes	24-283Official

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