



In the Matter of the Application of Castle Rock Solar, LLC for a Site Permit for the up to 150 MW Castle Rock Solar Project in Dakota County, Minnesota

Docket No. IP-7137/GS-24-267

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to provide comments to the Minnesota Public Utilities Commission (“Commission”) on the application of Castle Rock Solar, LLC for a Site Permit for development of an up to 150-megawatt (“MW”) solar generation project in Dakota County.

We believe that the project has the potential to deliver significant economic and energy benefits to LIUNA members and other residents of the Twin Cities and Southeast Minnesota. The potential for the project to provide construction employment and career opportunities is highlighted in the Environmental Assessment:

The use of local workers who reside in Dakota County could have significant positive impacts, not just through providing employment on this project, but by providing workers the opportunity to develop the required technical skills to work in the green economy,²⁴⁵ which can increase opportunities for future employment. Minnesota is anticipated to continue to expand renewable energy development in the coming years,²⁴⁶ and the state’s investments in the development and incentivization of clean energy²⁴⁷ will enable future renewable projects. Castle Rock Solar’s use of local labor would provide Minnesota workers with the relevant skills for the growing renewable industry, preparing them for future employment opportunities. (P. 103)

The Environmental Assessment also specifically identifies use of local vs. non-local workforce as a critical determinant for a project’s local employment and economic impact, observing that, “Local workers are found to generate approximately three times more local economic activity through spending than a non-local worker at the individual level, and a largely local workforce can generate up to double the economic impact of a largely non-local workforce.” (P. 103)

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 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)

Given the importance of local workforce utilization, we appreciated the commitment expressed by the former owners of Castle Rock Solar to work with LIUNA and other Building Trades unions to maximize local employment and construction career opportunities. While we have not had a chance to have a similar conversation with Atlantica, the new owner, we are hopeful that the workforce plan has not changed.

LIUNA has a long and successful history of working with clean energy developers and contractors to build utility-scale projects across Minnesota using local, skilled labor, and we are confident in our ability to do so again with this project. Provided that Atlantica remains committed to working with us, we believe that the project will deliver sufficient net employment and economic benefits to meet the statutory requirements and urge the Commission to grant a site permit.

We thank Commissioners for their thoughtful consideration.

Dated: November 3, 2025

Respectfully Submitted,

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