

## **Supplemental Comments**

### **In the Matter of Otter Tail Power Company's Petition for Approval of the Solway and Abercrombie Solar Projects; and In the Matter of the Petition of Otter Tail Power Company for Exemption from Certificate of Need for the 50 MW Solway Solar Project in Beltrami County, Minnesota**

**PUC Docket Number: E017/M-24-404**

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to comment on the petitions filed by Otter Tail Power ("Otter Tail") for approval to build and operate the 295 MW Abercrombie Solar Project in Richland County, ND and the 50 MW Solway Solar project in Beltrami County, Minnesota. LIUNA recommends that the Commission approve the petition based on our understanding of Otter Tail's plans to build the projects.

LIUNA represents more than 14,000 skilled construction laborers, including many that live in and around Otter Tail's service territory in Northwest Minnesota and Eastern North Dakota. Our members and their families count on affordable and reliable electricity, not only to power their homes, but also to serve construction contractors and energy intensive industries that provide jobs and work opportunities upon which they rely. We see both projects as sensible investments that will help Otter Tail deliver reliable energy and meet requirements in the utility's most recent Integrated Resource Plan to replace energy currently supplied by Coyote Station.

Like Otter Tail's Hoot Lake Solar project, Abercrombie and Solway Solar also have the potential to deliver significant socioeconomic benefits to regions that has seen relatively little clean energy development. In particular, we see Abercrombie's location on the Minnesota-North Dakota border as well-suited to provide work opportunities for members and new apprentices from both states, including population centers in Fargo, Fergus Falls and Alexandria, while Solway will provide opportunities for trades in North Central Minnesota.

The socioeconomic benefits associated with the project can be maximized by ensuring that the projects are built by union contractors that provide family-supporting wages and benefits to all of their employees, as well as apprenticeship opportunities that provide pathways for local and diverse workers to pursue construction careers. It is our understanding that Otter Tail intends to work with union contractors to accomplish these objectives on both projects.

Dated: February 18, 2025

Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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