

**Reply Comments from Operating Engineers Local 49 and North Central States Regional
Council of Carpenters**

October 8, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

*In the Matter of the Application of Xcel Energy for a Certificate of Need for Two Gen-Tie Lines
from Sherburne County to Lyon County, Minnesota (22-131)*

Dear Mr. Seuffert,

Thank you for the opportunity to submit comments on this matter. We respectfully submit this letter supporting a finding that this project meets the certificate of need requirements under state law and rule.

As the Public Utilities Commission (Commission) is aware, and as we have noted in previous comments, the proposed Gen-Tie lines are a critical component in executing the path laid out in Xcel Energy's most recently approved integrated resource plan. With the planned closure of the remaining Sherco coal units, it is important to preserve existing interconnection rights for use in deploying new solar generating assets which will benefit workers, ratepayers, and the environment. The construction of these Gen-Tie lines will help preserve those interconnection rights, while reducing the cost of future wind projects that can "tie-in" directly to the line. The Gen-Tie lines, and the subsequent wind projects that will be built as a result, will also be a source of high-quality jobs for local construction workers.

We would respectfully encourage the Commission to grant a certificate of need to Xcel to construct the Minnesota Energy Connection Project.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating Engineers Local 49

Richard Kolodziejski, Public Affairs Director, North Central States Regional Council of Carpenters