



In the Matter of the Application of Dodge County Wind, LLC for a Certificate of Need, a Site Permit, and a Route Permit for the up to 259 MW Large Wind Energy Conversion System and associated 161 kV Transmission Line in Dodge, Mower, and Steele Counties, Minnesota Public Utilities Commission (PUC)

Docket Number(s): IP6981/CN-20-865 (certificate of need); IP6981/WS-20-866 (site permit); IP6981/TL-20-867 (route permit)

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to offer comments on the up to 259 MW Dodge County Wind project and associated transmission line in Dodge, Mower and Steele Counties. LIUNA represents more than 14,000 unionized construction workers statewide, including many workers in and around the project site.

We believe that this wind project will provide significant socioeconomic benefits to the region by creating and sustaining high-quality construction and maintenance jobs; and to members of cooperatives served by Great River Energy (“GRE”) which will receive affordable clean energy from the project. This project will have an especially positive impact on the regional economy because NextEra, which owns and will operate Dodge County Wind, has indicated that the company’s Engineering Procurement and Construction (“EPC”) contractor will work with LIUNA and other construction unions to recruit and utilize skilled local workers.

We are confident NextEra will follow through on this commitment, not only because we continue to have constructive engagement with the developer, but also because they have a proven track record of working with unions to employ local workers on recent projects in Minnesota. For example, local workers composed approximately 75% of the workforce during Q3 and Q4 in 2020 on NextEra’s Mower Wind project.¹ That is an impressive utilization of local workers and demonstrates a clear commitment to maximize local socio-economic benefits.

The use of local workers not only creates good work opportunities for our members and neighbors, but it leads to much greater investment in the regional economy. Local workers spend 3-4x more money locally.² This higher level of local spending means higher earnings for area grocery stores, restaurants, car dealerships and other businesses.

The Laborers Union also supports Dodge County Wind because it will provide clean, affordable electricity to rural electric co-ops that get their power from Great River Energy. LIUNA members who get their electric service from area co-ops such as BENCO, Dakota Electric, Goodhue County, Minnesota Valley, and Steele-Waseca will benefit, as will members of co-ops

¹ See the following Mower County Wind LLC filings in MPUC Docket No. IP6557/WS-06-91: Compliance Filing – Section 10.4 – Quarterly Labor Statistics Report (Q3 2020) and No. IP6557/WS-06-91.

² Lucas Franco and Katie Hatt, *Catching the Wind: The impact of local vs. non-local hiring practices on construction of Minnesota wind farms*, The North Star Policy Institute, 2018.

statewide that are served by GRE. We commend GRE in their ambitious investment in clean energy including multiple wind projects in Southern Minnesota.

Utilities like GRE were leading the way in meeting Minnesota's greenhouse gas (GHG) reduction goals, even before Minnesota's 100% by 2040 clean energy law was enacted last year. Today, however, Dodge Wind is needed not only to meet the internal goals of GRE but also to achieve compliance with the enhanced Renewable Portfolio Standard and new carbon-free power standard.

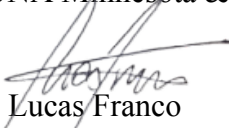
Finally, we support this project because NextEra is demonstrating their commitment to safety by utilizing skilled union labor and registered apprenticeship career pathways. LIUNA Minnesota runs the largest registered apprenticeship program in the state of Minnesota. Our training program is extensive and rigorous. To become a journeywork our members complete 288 hrs of classroom instruction and 4000 hours of on the job training. Workplace safety is a core component of the training program. This project will be built by highly skilled workers deeply committed to safety.

We further appreciate the hard work the NextEra team has done to accommodate local residents by finding a route that utilizes state road right-of-way and avoids the areas of greatest community concern. We encourage the Commission to approve the company's preferred transmission route in order to minimize adverse impacts to the local communities, local infrastructure, and environmental resources as detailed in the Environmental Assessment for the project.

In conclusion, we believe this project is both needed and clearly in the public interest. It will maximize local socioeconomic benefits and provide clean, reliable and affordable clean energy to many LIUNA households.

Dated: February 1, 2024

Respectfully Submitted,
LIUNA Minnesota & North Dakota


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