

## **MINNESOTA PUBLIC UTILITIES COMMISSION**

### **In the Matter of the Application of Benton Solar, LLC for Site Permits and a Route Permit a 100 MW Solar Energy Generating System, a 100 MW Battery Energy Storage System, and associated High-Voltage Transmission Line in Benton County, Minnesota**

**(Docket Nos. IP7115/GS-23-423, ESS-24-283, TL-23-425)**

#### **Laborers District Council of Minnesota and North Dakota Petition for Intervention**

The Laborers District Council of Minnesota and North Dakota (“LIUNA”) hereby petitions for intervention as a party in Minnesota Public Utility Commission (“Commission”) consideration of the petition of NextEra Energy Resources (“NextEra”) subsidiary Benton Solar, LLC for site permits and a route permit for a proposed 100 megawatt solar generation and battery storage project with associated transmission.

LIUNA is a democratic labor organization that, together with its five affiliated Local Unions, represents more than 14,000 construction workers and public employees in Minnesota and North Dakota. LIUNA’s principal place of business is located at 81 East Little Canada Road in Little Canada, Minnesota. LIUNA is affiliated with the Laborers’ International Union of North America, which represents roughly half a million construction workers and public employees across the United States and Canada.

LIUNA and its affiliated Local Unions represent members in many capacities, including, but not limited to, referring members for construction employment; bargaining with union employers over wages, benefits and working conditions; representing members in disputes with employers; encouraging construction owners and contractors to use union labor; advocating for public policies that protect the rights and livelihood of workers; providing health, retirement, training, and vacation savings benefits through joint labor-management funds; and educating our members about issues that affect their jobs and lives.

LIUNA’s legal rights, duties, or privileges will be affected by the disposition of these dockets. Our union represents hundreds of members who earn their living building and maintaining coal- and gas-fired and nuclear thermal power plants, hydroelectric dams, wind farms, and solar installations that provide power to utility customers. Our members, together with their families and communities, have an interest in the construction jobs that could be created on Benton Solar and competing renewable energy projects if the Commission approves or denies NextEra’s petition. Our members also have an interest in siting, construction, maintenance, and operations practices which help to maintain public confidence in, and support for, energy

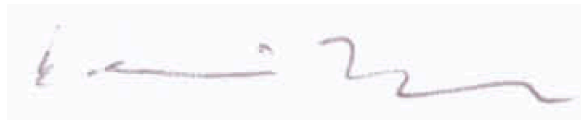
infrastructure projects. For these reasons, our union seeks to be an active stakeholder in public decision-making regarding energy infrastructure at both policy and project levels.

LIUNA seeks full party status in the above-captioned dockets to protect the rights and welfare of our members, families and communities, and to ensure that the Commission's ultimate decision is consistent with the interest of members and the public based on the unique perspective of men and women who build and maintain our energy system and critical infrastructure. No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above

LIUNA Minnesota has reviewed the requirements of Minn. R. 1400.7100 and has extensive experience as a formal party and informal participant in dozens of Commission proceedings. We are prepared to meet our obligations as a party in these dockets going forward as the Commission instructs.

Dated: November 6, 2024

Respectfully Submitted,

A handwritten signature in dark ink, appearing to read "Kevin Pranis", is written over a light gray rectangular background.

By: Kevin Pranis, Marketing Manager  
LIUNA Minnesota and North Dakota  
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