

**Reply Comments on the Proposed Hayward Solar Project
PUC Docket Numbers: IP-7053/CN-21-112 (Certificate of Need), IP-7053/GS-21-113 (Site
Permit)**

LIUNA Minnesota & North Dakota appreciates the opportunity to offer reply comments on the proposed Hayward Solar energy project and associated transmission infrastructure in Freeborn County. We agree with the position of the Department of Commerce Division of Energy Resources (“DER”) that Hayward Solar, LLC (“Applicant”) has demonstrated that the project meets all the criteria set out in statute and rule for a Certificate of Need.

LIUNA represents more than 28,000 unionized construction laborers and family members statewide, including members that live in and around Freeborn County. These members prioritize the creation of high-quality local employment opportunities, and see the construction of Hayward Solar as a means to both support regional economic development and meet clean energy goals established by the State of Minnesota and the public, cooperative and municipal utilities that serve Minnesota residents, as well as the needs of industrial, commercial and residential customers who increasingly seek affordable clean energy options.

Applicant has filed extensive evidence of recent and rapid growth in demand for clean energy from utilities and commercial customers – demonstrating a clear need for beneficial projects such as Hayward Solar. Demand for cost-effective renewable energy has become so great that utilities like Xcel Energy have at times struggled to find projects that met the company’s procurement goals.¹

We appreciate the thorough review and analysis conducted by DER staff on the evidence of need contained in the application, and we agree with their conclusion that the project meets applicable requirements with respect to the need for energy. We would add that we also believe that the project meets need criteria related to socioeconomic impacts based on information contained in the application along with Tenaska’s expressed commitment to working with unions to maximize use of local labor and the company’s record of following through on such commitments on projects such as Nobles 2 Wind.

We expect Hayward Solar to contribute millions of dollars in economic activity to southern Minnesota and create hundreds of family supporting jobs. This project will have an especially positive impact on the regional economy due to Tenaska’s plan to prioritize local hiring. We have seen far too many renewable energy projects rely primarily on traveling construction workers to build new wind and solar farms in the past. That will not happen on this project.

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 3-4 times more money locally generating higher earnings for area grocery stores, restaurants, car dealerships and other businesses.

¹ In the case of Deuel Harvest Wind, for example, Xcel initially sought to contract for projects that would have created high-quality jobs for Minnesota workers but was forced to take the third choice and purchased power from a South Dakota project when the first two options fell through.

Minnesota should be well-positioned to benefit from rising demand for renewable energy thanks to our solar resources and the capacity of our clean energy developers, contractors, and skilled trades workforce. In order to meet the market need for renewable energy, however, projects like Hayward Solar must be able to demonstrate to potential purchasers that they can secure the necessary permits and interconnection rights quickly enough to meet customers' timelines and secure tax credits.

Dated: March 23, 2022

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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