

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

June 16, 2022

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

*RE: In the Matter of the Application of Byron Solar, LLC for a Certificate of Need, Site Permit and Route Permit for the up to 200 MW Byron Solar Project and 345 kV Transmission Line in Olmstead and Dodge Counties, MN (dockets: IP7041/GS-20-763, IP7041/CN-20-764, IP7041/TL-20-765)*

Dear Mr. Seuffert,

Thank you for the opportunity to provide input on the Byron Solar Project. As labor unions who perform construction and maintenance work on a wide array of energy infrastructure projects across the state, we appreciate the opportunity to comment on the issue of whether to grant this project a certificate of need.

As we have noted previously in the docket, legacy energy infrastructure in Minnesota is primarily built, operated, and maintained by local, unionized workers who are paid family-sustaining wages and benefits. We appreciate that the project developer in this case, EDF Renewables, has indicated that the request for proposal (RFP) for construction will include preferences for “contractor bids that utilize local, union construction craft employees to the greatest extent feasible.” We believe that the use of local, union workers on this project will provide significant benefits to Minnesota.

As Minnesota seeks to transition away from carbon-emitting resources and towards carbon-free resources to power its electric system, there is an increased need for large utility-scale solar projects. In addition to the ongoing requirements that Minnesota utilities meet the renewable energy requirements of the Next Generation Energy Act, we are seeing utilities proactively announcing even more aggressive clean energy goals. For example, both Xcel Energy and Minnesota Power have announced goals of achieving 100% carbon free energy by 2050. Xcel’s recently approved integrated resource plan included a significant amount of new solar resources. Additionally, there are a number of Minnesota-based and national corporations that have adopted carbon-free energy goals.

The only way to achieve these ambitious collective goals is through the approval and construction of new solar projects. In the absence of permitted, shovel-ready solar projects that

can bring new generation on the grid, it will be increasingly challenging to retire existing resources and transition successfully. The recent OMS-MISO survey highlighted the significant capacity challenges facing the grid in 2023 and beyond in the absence of new capacity resources added to the grid.<sup>1</sup> These shortfalls threaten the reliability of our electricity system and demonstrate the need for projects like Byron Solar.

Lastly, while we recognize that state law requires the project to receive a certificate of need before proceeding to construction, we note that because EDF is an independent power producer and not a rate-regulated utility, approval of the project provides no risk to Minnesota ratepayers.

For the above reasons, we would respectfully encourage the Public Utilities Commission to issue a certificate of need.

Sincerely,

Adam Duinick, Director of Government Affairs, North Central States Regional Council of Carpenters

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

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<sup>1</sup><https://cdn.misoenergy.org/20220610%20OMS-MISO%20Survey%20Results%20Workshop%20Presentation625148.pdf>