

Reply Comments from North Central States Regional Council of Carpenters

April 15, 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 Hayward Solar, LLC for a Certificate of Need and Site Permit under the Alternative Permitting Process for the up to 150 MW Hayward Solar Project in Freeborn County (dockets: IP7053/CN-21-112, IP7053/GS-21-113)

Dear Mr. Seuffert,

Thank you for the opportunity to provide input on the Hayward Solar Project.

The North Central States Regional Council of Carpenters is a labor union representing approximately 12,000 workers and their families across Minnesota—including many in the Freeborn County region. Our members include carpenters, millwrights, floor coverers, lathers, pile drivers, and industrial workers across the state. As such, they work on a wide array of energy infrastructure construction and maintenance—including coal, natural gas, wind, solar, and nuclear.

Legacy energy infrastructure in Minnesota is primarily built, operated, and maintained by local, unionized workers who are paid family-sustaining wages and benefits. As Minnesota's energy system undergoes decarbonization and utilizes an increasing share of renewable resources, it is important to ensure that projects continue to benefit local workers and the local economy. In their initial application, the project developer, Tenaska, has indicated that the request for proposal (RFP) for project construction will include preferences for "contractor bids that utilize local, union construction craft employees to the greatest extent feasible..." Furthermore, the contractor selected through the RFP process will be "required to work with labor unions, local subcontractors, and other vendors to implement a project construction staffing model that maximizes local hiring and local economic benefits for the Project, while ensuring the Project is safely built on time and on budget." As such, the Project has the potential to provide significant local benefits to construction workers and their families in Freeborn County and the surrounding areas.

In addition to local jobs benefits, the project will help contribute towards Minnesota's goal of reducing greenhouse gas emissions within the energy sector, along with ensuring that Minnesota's energy system remains reliable and affordable for ratepayers. We agree with the analysis performed by the Department of Commerce Division of Energy Resources that the

project meets the statutory criteria for a Certificate of Need. With planned retirements of coal power facilities and ambitious solar power goals in recently approved and currently proposed Integrated Resources Plans, it will be important that projects like this advance through the regulatory approval process in a timely manner.

Thank you for the opportunity to provide feedback. We look forward to continuing to engage with the project developers and regulatory agencies throughout the regulatory process.

Sincerely,

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