

**In the Matter of Minnesota Power's Petition for Approval of Modifications to its Large Power Tariff**

**PUC Docket Number: E015/M-26-126**

LIUNA Minnesota and North Dakota appreciates the opportunity to offer comments to the Minnesota Public Utilities Commission ("Commission") on the petition filed by Minnesota Power for approval to accommodate new very large customers within the company's existing large load tariff. In our view, Minnesota Power's existing tariff provides a strong framework for the development and approval of Electric Service Agreements with data centers and other large load customers that meet new statutory requirements, and we urge the Commission to approve Minnesota Power's request.

LIUNA Minnesota and North Dakota represents more than 14,000 unionized construction laborers, including roughly 1,000 members who live in Northern Minnesota and rely on MP for electric service, either directly or through one of the utility's wholesale electric customers. In addition to electric service, LIUNA members rely on MP for job and career opportunities building and maintaining power generating facilities. Finally, our members depend on the utility to serve large industrial customers that form the backbone of the region's economy and provide local construction employment through Minnesota Power's existing large load tariff.

Over the past few years, the United States and the rest of the world have seen unprecedented growth in the development of data infrastructure, not only to meet rising demand for cloud computing and storage services, but also to support the operation of Large Language Models and other forms of artificial intelligence. Skyrocketing growth in the volume for data processing has in turn helped to accelerate growth in the electric sector that was already anticipated due to the coming electrification of buildings, transportation, and industrial processes.

Minnesota is well positioned to benefit from historic levels of investment in the construction and operation of data centers, which have the potential to create tens of thousands of construction jobs building facilities and associated generation assets; hundreds millions of dollars in tax revenues and efficiency programs investment; and new beneficial load that can help spread existing fixed costs and fund critical clean energy projects. In addition to our cold climate and aggressive 100% by 2040 carbon-free standard, Minnesota also benefits from our model for utility planning and regulation, which protects existing customers (and often allows them to benefit) from the impacts of rapidly growing demand on wholesale markets. Finally, Minnesota Power could benefit more than any other utility in the state from addition of large industrial customers whose usage electricity is not tied to global commodity demand cycles which currently make the utility uniquely vulnerable to downturns in markets for taconite and forestry products.

In our view, Minnesota Power's existing Large Load Tariff is consistent with Minnesota statutory requirements and policy goals, including Minn. Stat. § 216B.02, Subd. 11 and the Commission's Order in this case, while being flexible enough to allow for innovation and accommodate the needs of data centers and other large customers with diverse goals and business models. The

tariff appropriately assigns costs associated with serving each large load to the customer in question, ensuring unfair burdens are not placed on residential, commercial or other industrial ratepayers. Use of 10-year initial terms and multi-year termination notice requirements protect other customers from risks associated with unexpected loss of business, and the additional protections can be incorporated into individual ESAs as needed.

We thank the Commission for your consideration and ask you to approve use of Minnesota's existing Large Load Tariff for new large load additions to the system.

Dated: May 8, 2026

Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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