

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

April 21, 2025

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 Joint Application of Midwater BESS, LLC for a Site Permit and Route Permit for the up to 150 MW Midwater Energy Storage Project and Associated 161 kV Transmission Line in Freeborn County, Minnesota (24-294; 24-295)*

Dear Mr. Seuffert,

As labor unions representing workers in the construction industry and their families we respectfully submit these comments on the scoping for the environmental review for the proposed Midwater BESS storage project.

As the Public Utilities Commission ("Commission") is well aware, large scale battery storage systems like the ones proposed are going to play an important role in providing back-up electricity to meet some of the grid needs during times when renewables are not generating. As labor unions, we support all-of-the-above energy solutions—including battery storage. We have appreciated the opportunity to meet with applicants and are confident the project will use high-skilled labor that will provide family supporting jobs for local workers. Given that this is one of the first stand-alone battery projects in the state, we would encourage the Commission to adopt a scope for an environmental review that is reasonable and not overly burdensome for the applicant or Department of Commerce. Resources like these will be critical for meeting state goals and we should not set a precedent that discourages future development.

Thank you for considering these comments.

Sincerely,

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

Richard Kolodziejewski, Public Affairs Director, North Central States Regional Council of Carpenters