
Via Electronic Filing

August 27, 2019

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Xcel Energy's Proposed Acquisition of the Community Wind North and Jeffers Wind Facilities
(Docket No. E002/PA-18-777)

Dear Mr. Wolf:

The Laborers District Council of Minnesota and North Dakota ("LIUNA Minnesota & North Dakota") has not previously commented in Jeffers Wind acquisition docket and we recognize that the comment period has passed. Nevertheless, we hope that Public Utilities Commission staff and Commissioners will take notice of comments filed by our organization in a related Site Permit docket which are directly relevant to Xcel Energy's discussion of construction plans in the company's final August 19 reply comments.

On June 12, 2019, LIUNA Minnesota & North Dakota filed the following comments in the Jeffers Wind Energy Center Repower Site Permit docket (E6465/WS-05-1220) concerning the importance of ensuring that such projects maximize high-quality construction opportunities for local workers, in which we expressed a hope that the project owner would commit to making commercially reasonable efforts to maximize employment of local workforce and consider partnering with local labor unions to recruit and train qualified workers, as follows:

LIUNA Minnesota & North Dakota represents 12,000 unionized construction workers statewide, including many workers in Southwest Minnesota. We believe that the proposed repower can benefit both our members and the public at large by creating and sustaining high-quality construction and maintenance jobs. But we also recognize that those benefits may only be realized if Jeffers Wind 20, LLC, a subsidiary of Longroad Energy Management, LLC, commits to making commercially reasonable efforts to maximize employment of local workers and follows through on those commitments by utilizing a skilled local workforce and partnering with organizations such as ours that help to recruit and train qualified local workers.

The creation of high-quality construction jobs is not the primary objective of energy policy in Minnesota, but it is an important factor to consider, especially in a rural area of Minnesota where the availability of family-supporting blue-collar jobs is very limited. Some recent wind energy projects have created substantial local benefits by employing area tradesmen and tradeswomen. Others have generated controversy and disappointed many locals, however, by relying heavily on

an out-of-state construction workforce.

Our members and other residents of communities in Southwest Minnesota are often left wondering why more attention hasn't been paid to how wind project hiring decisions contribute – or don't contribute – to the sustainable development of their communities and the efficient use of local wind resources. They often hear promises of local workforce recruiting and hiring throughout the permitting process, but fail to see these commitments materialize over the course of a project.

Xcel Energy's comments indicate that the company has secured commitment from Longroad Energy Management to give preference to the use of union labor to build both the Jeffers and Community Wind Repower projects as part of the agreement to acquire the facility. Xcel's proposal is directly responsive to the concerns raised and action requested in our June 12 comments on the Jeffers Wind project, and will deliver substantial public benefits above and beyond the energy benefits that the project could deliver for ratepayers and the environment, in the form of dozens of jobs and millions of dollars in local economic stimulus, and as described in our June 12 comments.

The Public Utilities Commission does not mandate the use of local or union labor, but the Commission can and should recognize the value of practices that create high-quality job opportunities for Minnesotans, host communities, and ratepayers, and should give appropriate weight to these factors when considering whether to approve a transaction such as Xcel's proposed acquisition of Jeffers Wind. In this case, we hope that the Commission recognizes how Xcel's proposed course of action regarding acquisition of power resources can help to resolve a pressing challenge and advance the public interest in maximizing local employment in the development of wind energy facilities. We urge the Commission to connect the dots in this case and approve a proposal that delivers the sort of win-win solutions that Minnesota needs as we move toward a clean energy future.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Kevin Pranis", is centered below the "Sincerely," text.

Kevin Pranis
Marketing Manager
(612) 224-6464
kpranis@liunagro.com