

**Petition for Intervention International Union of Operating Engineers Local 49 and
North Central States Regional Council of Carpenters**

In the Matter of the Application of Benton Solar, LLC for a Site Permit for the 100 MW Solar Energy Generating System for the Benton Solar Project in Benton County, Minnesota (23-423)

The International Union of Operating Engineers Local 49 ("Local 49") and the North Central States Regional Council of Carpenters ("NCSRCC") hereby jointly petition for intervention as a party ("Local 49/NCSRCC") in Minnesota Public Utility Commission ("Commission") consideration of the application by Benton Solar, LLC for a site permit for the 100 MW solar project in Benton County ("Project").

Local 49 is a labor organization that represents more than 12,000 construction workers and public employees in Minnesota. Local 49 also represents construction workers and public employees in North Dakota and South Dakota. Local 49's principal place of business is located at 2829 Anthony Lane South in Minneapolis, Minnesota.

NCSRCC is a labor organization that represents more than 12,000 construction workers in Minnesota. NCSRCC also represents construction workers in North Dakota, South Dakota, Iowa, Wisconsin and Nebraska. NCSRCC's principal place of business is 700 Olive St. Saint Paul, MN 55130.

In addition to traditional union representation roles (collective bargaining for wages and benefits, representing members in disputes with employers, referring members for construction employment, etc.) both unions regularly advocate for our member's interests in public policy venues. Both unions are active participants in Commission proceedings where the outcome could impact work opportunities for our members. Both unions represent workers who build, maintain and repair energy infrastructure—including large solar generating facilities.

The project as proposed has a direct impact on both unions and our members. As noted above our members regularly build and maintain energy infrastructure. To the extent that the project utilizes contractors that are signatories to our unions, our members would gain work opportunities in project construction. Our members are also electric utility customers and would benefit from the electricity generated from the project if it were sold to a utility serving customers where our members reside.

Both unions seek joint, full party status in the above-captioned docket to protect the rights and welfare of our members, families and communities, and to ensure that the outcome of the proceeding is consistent with the interest of members and the public. Both unions have a unique interest and expertise that can not be represented in this proceeding by other parties.

Both unions understand the rights and responsibilities of parties under Minn. R. 1400.7100 and are prepared to meet those requirements.

Dated: 12/2/24

Respectfully Submitted,

Nate Runke, Regulatory and Political Affairs Coordinator
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49

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