

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

February 24, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

*In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures
in the Regal Solar Project for Recovery through Minnesota Power;s Renewable Resources
Rider under Minn. Stat 216B.1645 (24-343)*

*In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures
in the Boswell Solar Project for Recovery through Minnesota Power;s Renewable Resources
Rider under Minn. Stat 216B.1645 (24-344)*

Dear Mr. Seuffert,

Thank you for the opportunity to submit comments on this matter.

As the Public Utilities Commission (Commission) knows, our unions represent workers in the construction industry who build and maintain energy infrastructure—including solar. Both of our unions participated in the most recent Minnesota Power (MP) Integrated Resource Plan (IRP) and were parties to the settlement that resulted in the order point requiring MP to acquire up to 300 MW of solar resources.

We support MP's proposed investments in the Regal and Boswell solar projects which will provide cost-effective solar energy for Minnesota ratepayers and will allow MP to comply with Minnesota's clean energy requirements. We also believe both projects should qualify for the application towards MP's obligations under the 100% by 2040 law. We also support the use of the Renewable Resources Cost Recovery Rider for these projects.

MP has a strong track record of using union labor on their projects. As we transition towards more renewables it's important that we continue to create good paying job opportunities for the workers in the industry. We look forward to working with MP in the coming months to discuss staffing for the project and how we can maximize local workforce participation on the project.

Thank you for the opportunity to provide comments.

Sincerely,

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

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