



## Comments from LIUNA Minnesota and North Dakota

October 25, 2024

Ms. Lauren Agnew  
Minnesota Department of Commerce  
85 7th Place East, Suite 280  
St. Paul, MN 55101  
Lauren.Agnew@state.mn.us

*In the Matter of the Application of Birch Coulee Solar LLC for a Site Permit for the up to 125 MW Birch Coulee Solar Project in Renville County, Minnesota (PUC Docket No. IP7119/GS-23-477)*

Dear Ms. Agnew,

LIUNA Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to submit comments to the Minnesota Department of Commerce Energy Environmental Review and Analysis unit (“EERA”) on the scope of the Environmental Assessment that EERA staff will prepare for the Birch Coulee Solar project and associated transmission line proposed by The AES Corporation (“AES”).

In our view, Birch Coulee Solar has potential to deliver significant energy and socioeconomic benefits to a region of the state that has seen limited large-scale clean energy development. The location of the project makes it accessible to LIUNA members and other workers living in Central and Western Minnesota.

At the same time, AES has not yet provided enough information on proposed construction plans to clarify whether that potential will be realized. The application indicates that AES will “will seek to fill local positions with qualified candidates from the surrounding communities to the extent possible” and that “use of union labor is being considered and will be determined closer to construction” – creating considerable uncertainty regarding the project’s likely socioeconomic benefits to nearby communities and the State of Minnesota as a whole.

AES has not, to our knowledge, developed a large-scale renewable energy project in Minnesota, so it is not surprising that the company lacks familiarity with our construction labor markets. But as an organization that represents more than 14,000 construction laborers and has worked extensively on the permitting and execution of major wind and solar projects, we can confirm that the availability of skilled local workforce is a settled question: union trades have never failed to deliver sufficient workforce to build similar projects, even during times of high labor demand, and in more remote and less-populated areas of the state.

In recently-enacted legislation, including laws requiring 100% clean power and streamlining permitting, Minnesota legislators have made clear that the permitting process for large energy

projects approved by the Minnesota Public Utilities Commission (“Commission”) should prioritize the creation of high-quality jobs and career opportunities for local workers with a focus on construction, specifically adding the following criteria for consideration:

*(14) evaluation of the proposed facility's impact on socioeconomic factors; and*

*(15) evaluation of the proposed facility's employment and economic impacts in the vicinity of the facility site and throughout Minnesota, including the quantity and quality of construction and permanent jobs and their compensation levels. The commission must consider a facility's local employment and economic impacts, and may reject or place conditions on a site or route permit based on the local employment and economic impacts. (Minn. Stat. § 216E.03, Subd. 7)*

The statutory language requires that the Environmental Assessment consider the likely employment and other socioeconomic impacts of an actual project, not merely the hypothetical impacts of a hypothetical project of the same size and scope, just as the document must consider the likely environmental impacts of a specific project not hypothetical impacts. It is worth noting that the legislature has specifically authorized the Commission to reject or place conditions on a permit solely based on these impacts, so it is critically important to get this question right.

EERA can further help to inform the Commission’s consideration in this docket by assessing to what extent construction, operation and maintenance jobs created or preserved by the proposed resource are likely to meet other priorities recently established by the legislature:

- Employ Minnesota residents and/or individuals who permanently reside within 150 miles of the facility (“local workers” as defined in statute) vs. non-local workers.
- Provide “wages that support families” and respect “the rights of workers to organize and unionize”
- Support participation by residents of environmental justice areas and individuals that live in or near plant host communities.

EERA can draw on a substantial body of research that specifically addresses the socioeconomic impacts of local construction jobs created by large-scale renewable energy projects, some of which is available at [LocalJobsNorth.org](http://LocalJobsNorth.org). We are also happy to help fill in gaps based on our expertise in this area.

We thank EERA for its consideration.

Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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