

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

July 21, 2023

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 Request for Proposals for Solar or Solar-plus-Storage Hybrid  
Generation Resources by Northern States Power d/b/a Xcel Energy (EOO2/M-22-403)*

Dear Mr. Seuffert,

The International Union of Operating Engineers Local 49 (IUOE Local 49) and the North Central States Regional Council of Carpenters (NCSRCC) submit these comments in support of Xcel Energy's May 5, 2023 petition to approve the Sherco Solar 3 self-build and the Apple River Solar Power Purchase Agreement (PPA).

Both of our unions perform an array of work building and maintaining Minnesota's energy infrastructure. This includes work on coal, natural gas, and oil facilities, but also carbon-free resources like wind, solar, and nuclear. As the state seeks to decarbonize the electric system, projects like the two solar projects proposed by Xcel have the opportunity to create family-sustaining job opportunities for construction workers.

In addition to the job opportunities created for construction workers, the projects are critical to meeting the needs identified in the recently approved Xcel Integrated Resource Plan (IRP) and to meeting the requirements of the 100% by 2040 bill passed by the legislature this past session. It is our belief that these projects and the land acquisition are reasonable and in the public interest and would respectfully encourage the Public Utilities Commission (Commission) to approve them as proposed.

Lastly, as noted in their petition, Xcel utilized the Commission-approved Track 2 acquisition process. While the response to the Request for Proposals (RFP) was less robust than we would have hoped, it is our belief that this reflects the current market realities rather than a deficiency in the process. During the approval process for the original Sherco Solar project, a lot of time and effort was spent relitigating the RFP process for that project with parties raising concerns about specific requirements. In retrospect, and given the results of this RFP, it is clear that those concerns were without merit and that the results of that RFP, as in the present case, represented market conditions. While we recognize that there may be opportunities to learn and tweak the RFP process going forward, we believe this was a fair and transparent process.

As such, we would discourage efforts to relitigate and second-guess the RFP process based purely on the results, which are, in our view, driven primarily by market conditions.

Thank you for your consideration.

Sincerely,

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

Adam Duininck, Director of Government Affairs, North Central States Regional Council of Carpenters