

**Comments on the Application of Enbridge Solar (Plummer), LLC for a Site Permit for the  
up to 130 MW Plummer Solar Project in Red Lake County, MN**

**MPUC Docket No. IP7103/GS-22-451**

LIUNA Minnesota and North Dakota appreciates the opportunity to offer comments on scoping for environmental review of the application by Enbridge Solar LLC (“Plummer Solar”) for approval of a certificate of need and site permit and for the proposed 130 MW Plummer Solar project. We believe that the project offers potentially significant environmental and socioeconomic benefits.

LIUNA Minnesota and North Dakota represent more than 14,000 unionized construction workers statewide, including many that live in and around the communities where Plummer Solar would be built. 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.

In past years, we have seen some renewable energy projects generate controversy by relying heavily on an out-of-state construction workforce or by creating low quality jobs, while others have delivered substantial economic benefits to local communities. Fortunately, Enbridge Energy has committed to work with organized labor to maximize the local socioeconomic benefits of clean energy development, so we are confident that this project will prioritize creation of family-supporting job opportunities for local workers.

We hope that the Environmental Analysis will consider the following:

- How this project’s interconnection status could maximize the likelihood of success and provide a source of clean energy and associated economic development that may not be available to projects that lack strong queue positions.
- How the proposed addition of battery storage could maximize the economic and energy benefits of the project while helping to ease transmission congestion.
- How the creation of family-supporting construction jobs and career opportunities could benefit local workers and communities over the long term.

We thank the Commission for your consideration.

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Respectfully Submitted,  
LIUNA Minnesota & North Dakota

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