

International Brotherhood of Electrical Workers Local Union 292



Jeffrey J. Heimerl, Business Manager

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

November 2, 2021

RE: Xcel Energy's Requests for proposals (RFP) for the SHERCO Solar project
PUC Docket: Docket #E002/M-20-891

Dear Mr. Seuffert,
Chair Katie Sieben
MN PUC Commissioners,

On behalf of the electrical workers represented by IBEW Local 292 we submit this letter regarding Xcel Energy's effort to seek RFP's for the construction of a 460 MW solar installation at the SHERCO site in Sherburne County. IBEW Local 292 is fully supportive of this proposal, and we encourage your careful consideration of this permit request and eventual approval. We do outline in this letter some suggestions to help make this project the best investment for Xcel Energy ratepayers and residents of Minnesota, including that investment into the livelihoods of the Men and Women of the construction industry that will work on the installation of this project.

IBEW Local Union 292 represents nearly 5000 workers in the electrical industry in a geographical jurisdiction in the central part of the state from Minneapolis west to the South Dakota border. Our members live and work in Xcel Energy's territory and a large portion of our membership live very close to this proposed solar installation site. We are encouraged and supportive of this proposed project.

IBEW Local 292 members and the contractors we work for, install large scale solar from the ground up. This project would potentially create jobs for Members who live in Becker and the surrounding communities. We have a diverse and local group of members who are trained and ready to work on this project.

IBEW Local 292 Members are Xcel Energy rate payers. We see a direct investment in jobs from this proposal from what we pay to Xcel to provide us with household electricity. These proposals are an investment of our hard-earned money in to creating the jobs we rely on to provide for ourselves and our families.



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Our members, all Xcel Energy ratepayers, the Residents living near the proposed facility, and the general public, should expect a safe, reliable, and high-quality installation. An installation that should carry the requirements of local workers, proper worker supervision, and the use of registered Apprentice programs.

Further, to provide for the highest quality and safest installation, we ask that the PUC consider the requirements of MN State Building and Electrical Standards, specifically in MN State Statute around electrical installations. The Minnesota Electrical Act as outlined in [ss 365B 31-399](#) and subsequent rules, outline requirements for Electrical pre-engineering and inspection, licensing, installation requirements through the state adopted 2020 National Electrical Code, proper supervision of un-licensed individuals to licensed individuals. The requirements to follow Minnesota State Building, Construction and Electrical codes and standards as well as the requirements for local worker hiring and registered apprenticeship programs, we believe, will be the best investment for the Residents of Minnesota and the most responsible way to spend rate payers' money.

All previous Solar installations in the state of Minnesota have followed these requirements. We also know that Local, Minnesota Contractors have submitted RFP's with those standards and requirements in mind. If the PUC recognizes these standards as a requirement for this project, this will help to establishing the requirements for local workers, diversity and inclusion and strong apprenticeship standards for the project.

Thank you for opening this docket and giving the industry the opportunity to engage in the discussion. We continue to support the efforts in moving this project forward in an expedited way. As always, we are available to answer any questions or provide any further testimony as requested.

Sincerely,

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