

Comments from LIUNA Minnesota & North Dakota

November 10, 2021

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

RE: Xcel Energy Sherco Solar Acquisition

In the Matter of the Petition of Xcel Energy for Approval of the Acquisition of Solar Generation at Xcel Energy's Sherburne County Site.

PUC Docket Number: E-002/M-20-891

In the Matter of the Commission's Inquiry into Utility Investments that May Assist in Minnesota's Economic Recovery

PUC Docket Number: E, G-999/CI-20-492

Dear Mr. Seuffert,

LIUNA Minnesota & North Dakota ("LIUNA") appreciates the opportunity to offer comments to the Minnesota Public Utilities Commission ("Commission") on Xcel Energy's petition to build and operate a 460 megawatt ("MW") solar generation facility at the site of the utility's Sherburne County Generating Station ("Sherco").

Sherco Solar, which was originally proposed as part of Commission's Economic Recovery docket (20-492), offers an unique opportunity to accelerate Minnesota's move to clean energy, while generating jobs and economic development in communities that have been on the losing end of the energy transition due to plant closures, and creating new employment pathways for individuals from underserved communities to enter energy and construction careers..

LIUNA Minnesota & North Dakota represent more than 12,000 unionized construction workers statewide. This number includes hundreds of LIUNA members that live in or near the City of Becker and work at Xcel's Sherco and Monticello power plants. Many of these members face impending retirement of plants where they have worked for years, and their families have worked for generations.

Our members are worried about losing work in coal fired power facilities, the quality of jobs on new renewable energy projects. The Sherco Solar project could provide a chance for some of these members to direct their careers toward renewable energy work. The project could also help support local incomes and tax base that will be harmed by planned retirements. While renewable energy projects do not provide ongoing employment and economic benefits comparable to coal,

nuclear, or gas plants, they can still create hundreds of front-end construction jobs and career opportunities in addition to lease revenues for local landowners.

Sherco Solar can also maximize the socioeconomic benefits of utility investments in renewable energy by providing pathways to the middle class for communities that are underrepresented in construction and energy employment. While the overwhelming majority of large wind and solar projects are developed and built hours away from the Twin Cities metropolitan area, Becker is within commuting distance of communities that would be served by Xcel's proposed workforce pilot program.

Sherco Solar is an ideal vehicle to advance workforce and equity goals. Not only is the facility close to working-class communities of color in the Twin Cities and St. Cloud, but a large solar project also creates substantial employment opportunities for new apprentices who could gain enough experience over the roughly two-year construction process to be well-suited for other opportunities.

Beyond the substantial equity and socioeconomic benefits of Sherco Solar, we also believe that the project will deliver significant environmental and ratepayer benefits by making beneficial use of existing infrastructure and transmission interconnection rights. As Minnesota's transmission grid becomes increasingly congested, it is more important than ever to ensure that we make the best possible use of ratepayer assets embedded in existing power plants.

Dated: November 10, 2021 Respectfully Submitted, LIUNA Minnesota & North Dakota

> By: Kevin Pranis Marketing Manager 81 Little Canada Road St. Paul, MN 55117