



LIUNA Minnesota and North Dakota Comments the Applications of Lake Wilson Solar Energy LLC for a Certificate of Need for the up to 150 MW Lake Wilson Solar and Associated Battery Storage Project in Murray County, Minnesota

PUC Docket Numbers: IP-7070/CN-21-791

The Laborers District Council of Minnesota and North Dakota (“LIUNA”) appreciates the opportunity to offer comments to Minnesota Public Utilities Commission (“Commission”) on the up to 150 MW Lake Wilson Solar project that has been proposed by Invenergy subsidiary Lake Wilson Solar Energy, LLC (“Invenergy”) in Murray County, Minnesota. LIUNA represents more than 13,000 unionized construction workers statewide, including members who live in the project area. We believe that this up to 150 MW solar and 95 MW battery storage project has the potential to help the State of Minnesota meet ambitious new renewable and carbon-free energy goals while creating and sustaining high-quality construction and maintenance jobs; and to utility customers who could ultimately receive power from the project.

The Minnesota Legislature recently mandated that electric utilities serving Minnesota customers deliver power that is at least 55 percent renewable by 2035, and 100 percent carbon-free by 2040. In order to meet these requirements, the state’s investor-owned, cooperative and municipal utilities will need to build or acquire thousands of megawatts of solar generation along with additional wind generation, and dispatchable resources to keep the lights on when the sun is not shining and the wind is not blowing. The proposed project will help meet rapidly growing demand for solar and battery storage resources on the part of utilities and corporate customers pursuing their own goals.

Minnesota’s new clean energy law does not stop, however, at requiring the use of renewable and carbon-free energy. Instead the law makes clear that regulators should seek to maximize the local socioeconomic benefits of clean energy development by prioritizing creation of high-quality local construction jobs when making planning, resource acquisition, and permitting decisions. Lake Wilson Solar is expected to create approximately 250 construction jobs, and Invenergy has indicated in conversations with LIUNA and in the Certificate of Need (“CN”) application the company’s intention to partner with construction unions to maximize use of local union labor and meet Inflation Reduction Act goals..

Lake Wilson Solar will include preferences for contractor bids that utilize local, union construction craft employees to the greatest extent feasible in accordance with the Project’s budget, timeline, industry standards and requirements, and corporate safety policies. The selected EPC contractor will work with labor unions, local subcontractors, or other vendors to implement a Project construction staffing model that attempts to maximize local hiring and local economic benefits for the Project to the extent

practicable, while ensuring the Project is safely built on time and on budget. (CN Application, P. 19)

Minnesota currently faces significant obstacles to progress on energy and socioeconomic goals due to severe transmission congestion, which has sidelined proposed projects and forced curtailment of existing renewable generation. Fortunately, Lake Wilson Solar is one among a small handful of new renewable generation projects that have obtained interconnection agreements with the Midcontinent Independent System Operator (“MISO”). As a result, Lake Wilson Solar is one of the few Minnesota-based projects that can help meet our goals in the short term without relying on reuse of interconnections associated with retiring power plants or sharing with currently operating peaking plants.

In our view, the Lake Wilson Solar clearly meets the criteria for the grant of a CN because the project will meet needs identified by the state legislature for renewable, carbon-free energy and associated high-quality local job opportunities by making effective use of the scarcest resource in the energy transition – access to transmission. We do not see any indication in the record of contested issues of fact that would necessitate a contested case proceeding, and we strongly recommend that the Commission approve Invenergy’s application as soon as practicable.

Dated: November 6, 2023

Respectfully Submitted,
LIUNA Minnesota & North Dakota

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