



**LABORERS DISTRICT COUNCIL
MINNESOTA AND NORTH DAKOTA**

Affiliated with Laborers International Union
of North America

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TIMOTHY MACKEY
President & Business Manager

October 25, 2018

Via Electronic Filing

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
Saint Paul, MN 55101-2147

Re: Nobles Power Partners 2 Application for for Approval of Site Permit for
Nobles 2 Wind (Docket #s IP-6964/CN 16-289 /WS 17-597)

Dear Mr. Wolf:

The Laborers District Council of Minnesota and North Dakota ("LIUNA Minnesota") appreciates the opportunity to comment on what action the Public Utilities Commission should take regarding the disposition of Nobles 2 Power Partners' application for Certificate of Need and Site Permit for the proposed Nobles 2 Wind project.

Our organization has participated actively in the Nobles 2 proceedings, and we concur with the Applicant's view that the Commission has a full record in the case that supports approval of both a Certificate of Need and Site Permit. We have not seen in the submissions by the Department of Commerce Division of Energy Review ("DOC DER") any evidence that the approval of the project is not in the public interest, nor any evidence that undercuts the Administrative Law Judge's conclusions and recommendations.

Further, we are concerned that unnecessary delay could have negative consequences for Minnesota Power ratepayers as well as area workers and communities. Given the expiration of federal production tax credits and the nationwide rush to complete wind projects, we anticipate that repeating the RFP process would likely increase costs and reduce the benefit for ratepayers – assuming that the project remains viable at all.

LIUNA Minnesota strongly supports the Noble 2 project and appreciates the Applicant's commitment to good faith efforts and transparency on an issue of great concern not only to our members, but also to many other residents of Southern Minnesota. We ask that the Commission move forward expeditiously toward a decision in this case so ratepayers and construction workers can reap the benefits.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in dark ink, appearing to read "Kevin Pranis", written on a light-colored rectangular background.

Kevin Pranis
Marketing Manager