International Brotherhood of Electrical Workers Local Union 292



Jeffrey J. Heimerl, Business Manager

Bill Storm
Environmental Review Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

September 15, 2021

RE: Xcel Energy application for a site permit for the SHERCO Solar project

PUC Docket: Dockets: #C1-21-189, #C1-21-190, #CI-21-191

Dear Mr. Storm,

On behalf of the electrical workers represented by IBEW Local 292 we submit this letter regarding Xcel Energy's proposal seeking a permit to construct a 460 MW solar installation and associated utility routing at the SHERCO site in Sherburne County.

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

We want to take this opportunity to address the human and economic impact of this proposal. This solar project, proposed by Xcel Energy, will be instrumental in providing work opportunities in the construction industry in Minnesota, and we believe specifically for working families living within the City of Becker as well as the surrounding communities.

IBEW Local 292 Members, as well as all members of the community, 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 and in turn support the local economy.

As we are sure you are aware, employees at the current SHERCO coal burning power plant are facing an uncertain future because of the proposed plant closing. This prospect of a jobless future was further exacerbated by the recent loss of the previous promise of a natural gas driven electrical producing power plant at the current SHERCO location.

IBEW Local 292 members believe that this proposed solar project will not only provide for high paying and benefited constructions jobs but will also be instrumental in attracting more industry to the area, resulting in more jobs for the residents of Becker and the surrounding communities.

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IBEW Local 292 would also like to address the impact on the environment and the community in the form of a safe installation of this development. The Community should expect a safe, reliable, and high-quality installation. An installation that should carry the requirements of local workers, proper supervision, and the use of registered Apprenticeship programs. Further, to provide for the highest quality and safest installation for Xcel Energy ratepayers as well as all the residents living near the proposed facility, we ask that the environmental scoping consider the requirements in MN State Statute around electrical installations. The Minnesota Electrical Act as outlined in <u>ss 365B 31-399</u>; references requirements for Electrical pre-engineering and inspection, licensing, installation requirements through the state adopted 2020 National Electrical Code, proper supervision of un-licensed individuals by licensed individuals, as well as the requirements for local worker hiring and registered apprenticeship programs.

Thank you for taking on the task of receiving comments on these dockets and establishing this environmental scoping for this project. Thank you for giving our industry the opportunity to engage in the discussion. We continue to support the efforts in moving this project forward. As always, we are available to answer any questions or provide any further testimony as requested.

Sincerely,

Andy Snope IBEW Local 292

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