Laborers' International Union of North America

LiUNA! MINNESOTA & NORTH DAKOTA
Feel the Power

Reply Comments on Sherco Solar Project
PUC Docket Numbers: E-002/GS-21-191 (Site Permit), E-002/TL-21-190 (Route Permit for East 345 kV Transmission Line), E-002/TL-21-189 (Route Permit for West 345 kV Transmission Line)

LIUNA Minnesota & North Dakota appreciates the opportunity to offer comments on scoping for environmental review of Xcel Energy's petition for approval of a site permit and route permits for the proposed Sherco Solar Project. We believe that the project offers unique environmental and socioeconomic benefits compared to a typical greenfield solar installation, and hope to see these benefits captured in the environmental assessment.

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 an opportunity for some of these members to direct their careers toward renewable energy work. The project could also help support local incomes and local tax base that will be harmed by planned retirements.

The addition of 460 MW of solar energy in any location would have the potential to protect environmental resources by displacing carbon emissions. But Sherco Solar is unique because it would utilize an existing industrial site and existing interconnection resources, and would be built in relatively close proximity to plant host communities and to the Twin Cities Metropolitan Area. By comparison, most existing and proposed large wind and solar projects are located in renewable resource-rich areas of Southern Minnesota.

We hope that the Environmental Analysis will carefully examine the following:

- How utilization of an existing industrial site could minimize environmental impacts compared to brownfield construction.
- How utilization of existing interconnection rights and infrastructure could minimize environmental impacts and avoid further congestion of the transmission grid, lowering costs and facilitating future renewable development.
- How location of a large renewable energy project in a plant host community and adjacent to the Twin Cities could maximize the socioeconomic benefits where they are needed most -- namely in areas facing job and economic losses due to transition and for communities that have been underrepresented in the energy workforce.
- How Xcel's plan to prioritize employment of underrepresented populations on the project through the company's proposed workforce pilot could maximize socioeconomic benefits.

We thank the Commission for you consideration.

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Respectfully Submitted,
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