

**Comments from Operating Engineers Local 49 and North Central States Regional
Council of Carpenters**

April 29, 2022

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

RE: In the Matter of Minnesota Power's Application for Approval of its 2021-2035 Integrated Resource Plan Docket No. E015/RP-21-33

Dear Mr. Seuffert,

As labor unions representing workers in the construction industry and their families we respectfully submit these comments on Minnesota Power's proposed Integrated Resource Plan (IRP).

The International Union of Operating Engineers Local 49 (IUOE Local 49) represents more than 12,000 Operating Engineers and their families in Minnesota. Their members include heavy equipment operators and mechanics, along with stationary engineers. The North Central States Regional Council of Carpenters (Carpenters) represents approximately 12,000 workers and their families across Minnesota. Their members include carpenters, millwrights, floor coverers, lathers, pile drivers, and industrial workers across the state. Both unions work on a wide array of energy infrastructure construction and maintenance projects—including coal plants, natural gas plants, nuclear plants, wind and solar. This work includes the initial construction of large projects, but also ongoing maintenance at large coal and nuclear plants which serves as a major source of income for many of our members

Our members also perform construction and maintenance work at many of the large taconite mines and wood products facilities across northeastern Minnesota. These facilities make up a uniquely large portion of the load base on Minnesota Power's system. As large power users, the cost of electricity is a significant contributor to their overall cost of doing business. Furthermore, they operate in globally competitive industries and as a result are very cost sensitive. For these users, and our members who do work at their facilities, an affordable and reliable electricity system is critical.

We recognize the need to decarbonize Minnesota's electricity sector as part of the effort to meet Minnesota's Greenhouse Gas Emission reduction goals laid out in the Next Generation Energy Act. At the same time, it is important that in doing so we are protecting workers through the transition and maintaining reliable and affordable energy for Minnesota families and businesses.

Minnesota Power is to be commended for putting forward a proposed IRP that seeks to balance these priorities in a way that benefits workers and the communities they serve. The planned early retirement of Boswell unit 3 in 2029 and refuel or remission of Boswell unit 4 by 2035 will mean the Minnesota Power system will be coal-free by 2035 and on the path to 100% carbon free resources by 2050.

The timeline for retirement and conversion of these facilities provides an opportunity for the community and their workers to plan and prepare for the transition. As one of the most geographically isolated coal plant communities in Minnesota, this timeline is crucial for getting the transition right. It also helps ensure grid reliability in the region as we see an increase of electrification of our transportation and building sectors. The reliability will be supported by the construction of the Nemadji Trail Energy Center combined cycle gas plant which was previously approved by the Public Utilities Commission (PUC).

In addition to plans for the Boswell Energy Center units, the acquisition of 200 MW of new wind resources and 200 MW of solar will add to Minnesota Power's renewable energy portfolio. Reusing existing interconnections for the proposed solar will provide a potential opportunity to support workers and communities impacted by the retirement of units at the facility.

As outlined above, Minnesota Power's proposed IRP seeks to further decarbonize their system in a planned and thoughtful manner. It is clear from their proposal that Minnesota Power takes seriously the impacts on workers and communities that have generated the electricity that for decades Minnesotans have depended on. We look forward to continuing to engage with Minnesota Power and the PUC throughout this process.

Thank you for considering these comments.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating Engineers Local 49

Adam Duininck, Director of Government Affairs, North Central States Regional Council of Carpenters