

STATE OF MINNESOTA)
) SS.
COUNTY OF OLMSTED)

Sheldon Steele, who currently resides at 109 South Main Street in Grand Meadow,
Minnesota, being duly sworn under oath, hereby states as follows:

I am the Business Manager of Laborers International Union of North America Local 405,
which represents more than 600 construction laborers that live and work in Southeast
Minnesota. I have been employed in the construction industry for nearly 30 years, including
roughly 16 years as a construction laborer for Rochester-based excavation contractor Fraser
Construction, and four years as Business Agent for Local 405. My work as a laborer and
Business Agent has allowed me to acquire extensive knowledge of various aspects of
construction.

In addition to my construction experience, I have a working knowledge of the wind energy
industry gained during roughly two years spent between 2008 and 2010 working for
renewable energy company EDF EN as a wind turbine maintenance supervisor at the Grand
Meadow Wind Farm. Our maintenance work overlapped with that of the crews that were
completing construction the project, which provided an opportunity for me to observe their
work and the operations of the Engineering Procurement & Construction (“EPC”) contractor
Mortenson Construction.

The Grand Meadow Wind Farm construction project employed a large number of
Minnesota workers, including members of Local 405 who lived in the local area. I would
estimate based on my conversations with crew members and observations that
Minnesotans made up a majority of the construction workforce.

When I first heard about plans for Renewable Energy Systems (“RES”) America’s Pleasant
Valley wind farm, I was hopeful that the project would create dozens of jobs for area

construction workers. I thought that the project might create opportunities for local members, and that at the very least the construction paychecks would boost the local economy. Unfortunately, few local workers, if any, were able to take advantage of construction jobs created by the project based on my observations.

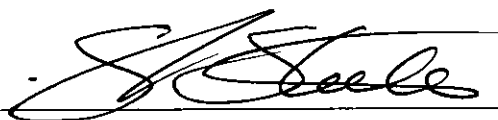
The project was located some 10 to 15 miles from my home, and I made it a regular practice to drive by the project on my way back from work to observe their progress and look at the license plates in the construction yards. I estimate that I drove by the project more than 50 times during construction, and took time to observe license plates on some two dozen occasions.

I saw very few Minnesota license plates on the workers' vehicles. I would estimate that fewer than 10 percent of the license plates were from Minnesota, and that a large majority were far-away states such as California and Texas. In my experience, the license plates in a construction yard provide an accurate snapshot of the origin of the workforce, since the vast majority of construction workers drive personal vehicles to work each day.

My interactions with and observations of the construction crews in the community also reinforced my impression that most had come from far away. On the other hand, I know a lot of area construction workers, and I can't think of one that worked on the project. I am not aware of any efforts that RES undertook to recruit local workers for the project.

The above is true and correct to the best of my knowledge.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

Signed 

Subscribed and sworn to before me
This 27 day of June, 2018.

Notary Public 