

**International Brotherhood of Electrical Workers Local 31
2002 LONDON RD, STE 105
DULUTH, MN 55812**

August 26, 2022

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

Re: IBEW Local 31 – In the Matter of Minnesota Power’s Application for Approval of its 2021-2035 Integrated Resource Plan, Docket No. E015/RP-21-33

Introduction

The International Brotherhood of Electrical Workers (IBEW) Local 31 appreciates the opportunity to provide comments on Minnesota Power’s *Energy Forward* Integrated Resource Plan (“IRP”) filed on February 1, 2021.

IBEW Local 31 represents 120 workers currently working for Minnesota Power at the utility’s Boswell power plant Cohasset. In addition, most of our members also live within Minnesota Power’s service territory in cities and townships that will be directly impacted by the proposed closure of the Boswell facility.

Clean Energy Transition

Over the past two decades, Minnesota Power has embarked on an aggressive transition to lower-carbon energy sources. That transition has allowed Minnesota Power to be the first utility in the state to produce over 50 percent of its electricity from carbon-free generation, largely by closing seven of its nine coal plants. The two remaining coal-burning units at the Boswell facility in Cohasset are scheduled to be closed in 2030 and 2035, respectively.

IBEW Local 31 has worked with Minnesota Power to help our members transition after previous plant closures and we appreciate the utility’s efforts and success in finding positions for our members within the company. However, the proposed closures of Units 3 and 4 at the Boswell reflect a new reality for our members since there aren’t the same opportunities to move to positions at Minnesota Power. The jobs just aren’t there.