

Comments from International Union of Operating Engineers Local 49

January 15 2024

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

RE: In the Matter of a Petition by CenterPoint Energy for Approval of its First Natural Gas Innovation Plan (23-215)

Dear Mr. Seuffert,

Thank you for the opportunity to submit comments on CenterPoint Energy's first Natural Gas Innovation Plan.

The International Union of Operating Engineers Local 49 (IUOE Local 49) is a construction labor union in Minnesota representing heavy equipment operators and mechanics, along with stationary engineers. A significant portion of our members earn a living for themselves and provide for their families building and maintaining the state's natural gas infrastructure. We appreciate the opportunity presented by the Natural Gas Innovation Act (NGIA) to pilot new innovative resources as part of the gas utility system.

We support CenterPoint Energy's plan and would encourage the Public Utilities Commission (Commission) to approve it. The plan includes a number of exciting pilot projects that will allow the utilities, Commission, and stakeholders to better understand the benefits and costs of innovative resources to climate, jobs, and local economic development. The provisions of the NGIA were fairly prescriptive as to which types of innovative resources must be part of the initial plan and in what proportions. As a result, we believe that efforts to significantly modify the plan may inadvertently create further delays. While there are some pilot projects that we are more supportive of than others, we support the plan as a whole, recognizing that reducing greenhouse gas emissions from the natural gas utility system is going to take an array of innovative resources and approaches.

CenterPoint Energy has done a great job ensuring that the work building and maintaining its natural gas distribution system would benefit workers and their families. We are confident that the innovative projects that CenterPoint will be directly owning will do the same. However, some of the proposed pilot projects rely on third party contractors and we look forward to continuing to work with CenterPoint Energy on ensuring that those projects maintain similar labor standards.

Thank you for the opportunity to submit comments.

Sincerely,

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