

**Comments from Operating Engineers Local 49, North Central States Regional Council of
Carpenters and LIUNA Minnesota & North Dakota**

November 17, 2021

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

*RE: Proposed rulemaking on Certificate of Need, Site Permit and Route Permits for Large
Electric Power Plants and High-Voltage Transmission Lines (Docket E,ET,IP-999/R-12-1246)*

Dear Mr. Seuffert,

As labor unions representing workers in construction industry we respectfully submit this letter requesting a public hearing in front of an Administrative Law Judge (ALJ) on the proposed amendments to the Public Utility Commission's (PUC) rules governing Certificates of Need and Site and Route Permits for Large Electric Power Plants and High-Voltage Transmission Lines (docket 12-1246).

Our members include more than 35,000 workers in Minnesota and perform work throughout the energy sector. As a sector that is undergoing a significant transformation, it is critical for our members that the rules guiding the granting of Certificates of Need and Routing and Siting permits have a clear and efficient process for considering public input and arriving at final decisions.

Union tradesmen and tradeswomen value simple and straightforward opportunities to engage with the process and have their voices heard. We appreciate the efforts in recent years by the PUC to include the voice of workers in the decision-making process. We believe that our members' involvement leads to better projects and enhances economic benefits to local communities.

The rulemaking process under consideration in this docket began almost a decade ago at a time when worker voices were largely absent from Commission proceedings. Much has changed in the energy sector since that time. We are concerned that the proposed changes do not adequately reflect recent developments in the sector or our members' interest in an accessible and efficient permitting process. As such, we formally request a public hearing.

Thank you for the opportunity to provide 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

Kevin Pranis, Marketing Manager, LIUNA Minnesota and North Dakota