

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

Sep 13, 2023

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

*RE: In the Matter of Otter Tail Power Company's 2021 Integrated Resource Plan  
ET2/RP-21-339*

Dear Mr. Seuffert,

As labor unions representing workers in the construction industry and their families we respectfully submit these comments on Otter Tail Power Company's ("OTP") 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, along with members in North and South Dakota. 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, along with members in Wisconsin, Iowa, Nebraska, North Dakota and South Dakota. 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 plants which serves as a major source of income for many of our members.

We appreciate the opportunity to review OTP's IRP and express our support for the supplemental plan as filed. As we discussed previously, we believe there remains a need for onsite fuel storage at Astoria Station. We have all recently witnessed the impacts that major weather events can have in terms of creating shortages in natural gas availability and price spikes. Having an onsite storage facility for natural gas will provide a hedge for Otter Tail Power customers against these price events and ensure that the peaker facility is always able to provide capacity when needed. Notably, this natural gas storage facility will not impact greenhouse gas emissions at all since the stored natural gas would only be displacing delivered natural gas. Likewise, we agree with OTP that Coyote Station remains a cost effective resource for OTP customers. Our members, in particular Millwrights, perform regular maintenance work at the facility and its continued operation ensures they will continue to have work opportunities.

We are also supportive of the new wind and solar resources in the supplemental plan and look forward to continuing our discussions with OTP about how to best ensure those projects utilize local labor and create good paying jobs for construction workers.

For the above reasons we support OTP's proposed supplemental plan. 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