



**International Brotherhood of Electrical Workers
Local Union No. 31**

2002 London Road Suite 105 Duluth MN 55812
(218) 728-4248 Fax (218) 728-1651 E-Mail: ibew31@ibew31.com www.ibew31.com

June 23, 2020

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Minnesota Power's 2015 Integrated Resource Plan
Docket No. E015/RP-15-690

In the Matter of Optional Integrated Resource Plan Compliance
Docket No. E015/AI-17-568

Dear Mr. Seuffert,

We, the International Brotherhood of Electrical Workers Local Union 31 ("Local 31"), respectfully submit our support for the 6 month extension as requested by Minnesota Power ("the Company") regarding their Integrated Resource Plan ("IRP"), Baseload Retirement Study, and Securitization Plan as filed May 29, 2020.

Local 31 represents approximately 411 workers employed by Minnesota Power, the majority of whom reside within the Minnesota Power service area as customers of the utility in either a wholesale or retail capacity. Our interest in the outcome of proceeding is that of the continued employment of our Members, the economic condition of the Company as it pertains to collective bargaining, the pressure on rates as ratepayers of the Company, and the local economic impacts of directives that may lead to plant closure or other changes to the Company's generation portfolio and operations.

Local 31 agrees with the Company's position that the current Pandemic has made for irregular working circumstances including a rate of depressed customer load that is not

representative of normal operations, the divided attention of Company resources and interested parties with respect to response planning, and an inability to be heard as a public stakeholder due to Minnesota directives on social distancing.

Local 31 will utilize the additional time allowed to work with our Membership on establishing our position to the IRP, relay our objectives and concerns to the Company, and seek support and alignment in our communities.

Respectfully,

A handwritten signature in cursive script that reads "Kristin Renskers".

Kristin Renskers

IBEW Local 31

Business Representative

(218) 969-2201

krenskers@ibew31.com