

**Comments of LIUNA Minnesota and North Dakota
PUC Docket Number: Docket No. E017/RP-21-339**

Dec 30, 2022

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 2021-2035 Integrated Plan (Astoria Station Dual Fuel Proposal) (21-339)

Dear Mr. Seuffert,

LIUNA Minnesota and North Dakota ("LIUNA") appreciates the opportunity to offer comments to the Minnesota Public Utilities Commission ("Commission") on Otter Tail Power Company's proposal to add dual fuel capability at Astoria Station.

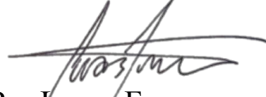
The proposed project is necessary to ensure reliability for customers, who depend on Astoria Station as a peaking and backup resource, and to limit the exposure of Otter Tail customers generally to cost and reliability risks associated with extreme weather events. The Astoria Station proposal is an example of the type of smart climate adaptation that utilities will need to make going forward in order to mitigate the effects of climate change.

LIUNA has a direct interest in this proceeding because our union represents thousands who will benefit from reduced risk of outages during increasingly frequent winter storms. Our members have felt the impacts of spiking natural gas prices through their electric and natural gas and they would benefit from Otter Tail's reduced reliance on natural gas during extreme weather events.

The project has the potential to provide meaningful socioeconomic benefits to LIUNA members and fellow trades employed to retrofit the facility with dual-fuel burners and build associated infrastructure such as piping and storage tanks. While relatively small, the project could provide valuable employment opportunities for area tradesmen and tradeswomen with thermal power plant skills and experience who are facing diminishing opportunities in the energy transition. Similar to the Operating Engineers Local 49 and North Central States Regional Council of Carpenters, we look forward to further engaging with Otter Tail Power Company to better understand their workforce plans.

Dated: December 30, 2022

Respectfully Submitted,
LIUNA Minnesota & North Dakota


By: Lucas Franco

Research Manager
81 Little Canada Road
St. Paul, MN 55117