

Mankato Building Trades Comments on Proposed Nobles 2 Wind Project in Nobles County (IP-6964 - CN 16-289 - WS 17-597)

The Mankato Building and Construction Trades Council appreciates the opportunity to comment on the 260 MW wind energy project proposed by Nobles Power Partners 2, LLC, and respectfully requests that the Minnesota Public Utilities Commission and the Minnesota Department of Commerce investigate and incorporate into the environmental document the project's potential human impact on local construction employment and on the safety of workers and area residents. We also request that the Commission and the Department revise the draft site permit to incorporate any commitments that representatives of Nobles 2 Power Partners, LLC and parent company Tenaska have made or are willing to make going forward regarding local hiring and safety; and to require the company to submit quarterly reports on the employment of local and non-local workers on the construction and maintenance of the project.

The Mankato Building Trades is part of the Minnesota Building and Construction Trades Council, which represents over 65,000 unionized construction workers statewide. In Southwest Minnesota, the Mankato Building Trades and its affiliated local unions represent hundreds of skilled construction workers including many that live near Canby where the proposed wind installation would be located. We believe that the proposed project can benefit both our members and the public at large by creating and sustaining high-quality construction and maintenance jobs. But we also recognize that those benefits may only be realized if Tenaska commits to making commercially reasonable efforts to maximize employment of local workers and follows through on those commitments by utilizing skilled local workforce and partnering with organizations such as ours that help to recruit and train qualified local workers.

The creation of high-quality construction jobs is not the primary objective of energy policy in Minnesota, but it is an important factor to consider, especially in a rural area of Minnesota where the availability of family-supporting blue-collar jobs is very limited. Some recent wind energy projects have created substantial local benefits by employing area tradesmen and tradeswomen. Others have generated controversy and disappointed many locals, however, by relying heavily on out-of-state construction workforce.

Building trades members and other residents of communities in Southwest Minnesota are left wondering why more attention hasn't been paid to how the wind project hiring decisions contribute – or don't contribute – to the sustainable development of their communities and the efficient use of local wind resources. It is difficult for our members to understand why the draft permit for wind projects contain extensive language on potential species effects and little to nothing on safety and local jobs. Our members also believe that more attention needs to be paid to the impact of approving the project on other competing projects that could contribute to local employment and economic development.

What potential human and environmental impacts of the proposed project should be considered in the environmental document and the draft site permit?

First, the Mankato Building Trades urge the PUC and DOC to consider the construction jobs created by the proposed project, which is by far its most direct and significant near-term human

impact, and to what degree the jobs will be employ local residents based on Tenaska's stated commitments, workforce plan, and past performance on similar projects. We would encourage PUC and DOC staff to speak with our affiliated unions and skilled wind construction workers who live in the area to obtain information on the feasibility and impact of local vs. non-local construction hiring.

Second, the Mankato Building Trades urge the PUC and DOC to evaluate these impacts in the context of a market where the number of wind projects in the development exceed anticipated demand, creating a situation in which the approval of one project may come at the expense of another that brings with it greater benefits. For example, a 200 MW wind project that creates a single local job nonetheless appears, when taken out of context, to deliver a net local benefit. On the other hand, if such a project displaces another that would have employer 50 local workers, then the true impact would be a loss of 49 jobs.

Third, the Mankato Building Trades urge the PUC and DOC to incorporate a requirement that RES Americas provide quarterly reports of construction hours worked by Minnesota vs. out-of-state workers – optionally including a report of hours worked by workers who live within 100 miles of the project – during the construction phase of the project.

What are the possible methods to minimize, mitigate, or avoid potential impacts of the proposed project?

Fourth, the Mankato Building Trades urges the PUC and DOC to ascertain what commitments Tenaska is willing to make regarding the company's efforts to employ local workforce and incorporate those commitments into the site permit.

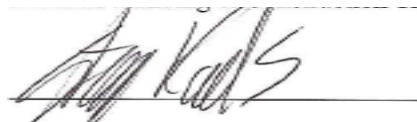
Fifth, the Mankato Building Trades urges the PUC and DOC to request from Tenaska detailed information on the safety program that the company intends to implement during construction to protect workers and civilians, and to incorporate said information into the site permit requirements for the project.

Are there any items missing or mischaracterized in the certificate of need or site permit applications?

There is little information in the application with regard to Tenaska's plans regarding staffing and safety during the construction phase of the project. We nonetheless appreciate Tenaska's willingness to discuss these matters with affiliated unions, and hope to receiving additional information as the company develops its plan to select an EPC contractor to build the facility.

Dated: March 20, 2018

Respectfully Submitted,
Mankato Building & Construction Trades Council



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