

MN PUBLIC UTILITIES COMMISSION

<p>In the Matter of Buffalo Ridge Wind, LLC's application for a Certificate of Need and Site Permit for a 109 MW Large Wind Energy Conversion System in Lincoln and Pipestone Counties, Minnesota</p> <p>MPUC DOCKETS IP7006/CN-19-309 IP7006/WS-19-394</p>	<p>Petition for Intervention Laborers District Council of Minnesota and North Dakota</p>
---	--

The Laborers District Council of Minnesota and North Dakota (“LIUNA Minnesota & North Dakota”) hereby petitions for intervention as a party in the above-captioned dockets for a Certificate of Need and Site Permit for a 109 MW large wind energy conversion system by Buffalo Ridge Wind, LLC (“Applicant”) pursuant to Minn. Rules 7854.0900 and Minnesota Rules 1400.6200.

LIUNA Minnesota & North Dakota is a democratic labor organization that, together with its five affiliated Local Unions represents more than 12,000 construction workers and public employees in Minnesota and North Dakota. LIUNA Minnesota & North Dakota is affiliated with the Laborers’ International Union of North America, which represents roughly half a million construction workers and public employees across the United States and Canada. LIUNA Minnesota & North Dakota’s principal place of business is located at 81 East Little Canada Road in Little Canada, Minnesota.

LIUNA Minnesota and its affiliated Local Unions represent our members in many capacities, including, but not limited to, referring members for construction employment; bargaining with union employers over wages, benefits and working conditions; representing members in disputes with employers; encouraging construction owners and contractors to use union labor; advocating for public policies that protect the rights and livelihood of workers; providing health, retirement, training, and vacation savings benefits through joint labor-management funds; and educating our members about issues that affect their jobs and lives.

LIUNA Minnesota has a record of supporting the development of renewable energy resources in Minnesota and North Dakota, and has actively supported the clean energy industry in efforts ranging from advocacy for extension of Production Tax Credits at the national level and clean energy legislation at the state level to participating in permitting proceedings for numerous proposed wind energy projects. At the same time, we want to ensure that wind energy projects

are being developed in a manner that advances the interests of local workers and communities, and is consistent with Minnesota's commitment to sustainable development and efficient use of resources.

LIUNA Minnesota & North Dakota's legal rights, duties, or privileges may be affected by the disposition of these dockets for the following reasons:

- LIUNA Minnesota & North Dakota represents hundreds of members who live in Southwest Minnesota who, together with their families and communities, have an interest in the creation of high-quality local construction jobs and the generation of local economic activity through the sustainable development of energy infrastructure in a part of the state that is rich in wind resource.
- A decision by the Public Utility Commission ("Commission") to approve or reject the Project could directly affect the interest of our members, together with their families and communities, in the construction jobs that the Applicant projects would be created by the Project, as well as the Project's immediate local economic and tax impacts.
- A decision by the Commission to approve or reject the Project could also affect the interests of our members in Southwest Minnesota, together with their families and communities, by impacting competing wind energy projects currently under development in Southern Minnesota that are also a potential source of local construction jobs and economic activity.
- The LIUNA Minnesota represents union members statewide that work in the construction and maintenance of conventional power plants. These members' livelihoods could be impacted by whether and in what manner the Project moves forward, inasmuch as the Project could reduce demand for power from plants where our members are employed, and inasmuch as the Project would provide or fail to provide alternative job opportunities to our members.
- The LIUNA Minnesota represents union members statewide that, together with their families, communities, and employers, have an interest in a sustainable development of renewable energy generation and a transition away from fossil fuels that ensures the continued affordability and reliability of power supplies to our homes, places of work, and industry partners. The Commission's decision to approve or reject the Project could aid or hamper a smooth and successful transition.

- Specifically, the union members represented by LIUNA Minnesota & North Dakota, together with their families, communities and employers, have an interest in proper siting, construction, maintenance, and operations practices which help to maintain public confidence in, and support for, energy infrastructure projects. For this reason, our union seeks to be an active stakeholder in public decision-making regarding energy infrastructure at both policy and project levels.
- The union members represented by LIUNA Minnesota have an interest in the safety of energy infrastructure construction workers, and in efforts to protect workers from construction hazards that can arise on wind energy projects, which have claimed the lives of two workers in the past 18 months.

LIUNA Minnesota & North Dakota seeks full rights as a party in each of the above-captioned dockets to protect the rights and welfare of our members, families and communities, and to ensure that the development of wind energy infrastructure can proceed in a manner that benefits Southwest Minnesota's skilled construction workers and local communities as well as the state as a whole. No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above

LIUNA Minnesota has reviewed the requirements of Minn. R. 1400.7100 and has experience both as a party and as a non-party participant in numerous wind and pipeline permitting cases in Minnesota and North Dakota. We prepared to meet our obligations as a party to these cases as the Commission instructs.

Dated: 8/22/2019

Respectfully Submitted,



By: Kevin Pranis, Marketing Manager
LIUNA Minnesota
81 East Little Canada Road
St. Paul, MN 55117