INTERNATIONAL UNION OF OPERATING ENGINEERS

LOCAL NO. 49, 49A, 49B, 49C, 49D, 49E, 49L Minnesota • North Dakota • South Dakota

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To: Minnesota Public Utilities Commission (MN PUC)

From: Nathaniel Runke- Regulatory & Political Affairs Coordinator, Int'l Union of Operating

Engineers, Local 49 **Date**: April 8, 2021

RE: Docket Number. E002/RP-19-368

In the Matter of Xcel Energy's 2020-2034 Upper Midwest Integrated Resource Plan

On behalf of the over 14,000 heavy equipment operating engineers represented by the International Union of Operating Engineers, Local 49 ("Local 49") across Minnesota, North Dakota, and South Dakota, I am thankful for the opportunity to comment in support of Xcel Energy's Integrated Resource Plan (IRP).

I would like to echo the comments of other labor organizations on this docket concerning the important role Xcel Energy facilities have played in the lives of our members and the communities they live in. Many of our members harbor concerns about the loss of these traditional energy generation facilities along with the job opportunities they represented. These concerns were heightened in the recent past because many renewable developers chose to use out-of-state contractors and labor for the construction of their projects. However, Xcel Energy's efforts to utilize local union labor for construction of its renewable energy projects and its longstanding tradition of using local contractors and union labor has given our members and their families a hopeful glimpse at a potential Minnesota energy future.

This IRP showcases Xcel Energy's responsible approach to transitioning its asset mix to meet Minnesota's carbon reduction goals. It lays out a path for the transition of utility generation resources away from fossil fuels while maintaining reasonable costs and a dependable energy supply for its ratepayers. As many of our members are a part of this ratepayer group, we greatly appreciate this. The transition is achieved through a thoughtful process of retirement of coal fired power plants, addition of renewable and firm peaking facilities, and the extension of use of nuclear facilities. This approach aligns with Xcel Energy's efforts, laid out in Attachment E of the IRP, to minimize the transitions effect on host communities and employees of legacy generation facilities.

One notable example of this is the requested continued operation of the Monticello Nuclear Plant 10 years beyond its current license. This will allow the highly skilled men and women that work at and maintain the Monticello Nuclear Plant to continue that work through 2040. Meaning the host community, and Minnesota as a whole, reaps a two-fold benefit of a continued source of both a reliable carbon free electricity source and family sustaining employment opportunities.

Another way Xcel Energy is ensuring the energy transition process is fair and just is through its commitment to using labor covered by collective bargaining agreements for its renewable projects. While this commitment comes as no surprise, as Xcel Energy has a proven track record of supporting local skilled labor in its projects, it is not a commitment shared by all utilities and developers. By continuing the long-standing support of union labor at their legacy generation facilities into their work building renewable energy facilities, they ensure Minnesota's strong building trades workforce is utilized.

Xcel Energy's IRP also describes how they are cultivating a diverse and inclusive workforce throughout this transition. Xcel Energy's commitment to utilizing local union labor to staff and maintain their facilities aids in furthering this mission. Local 49 and our signatory contractors strive to diversify and grow our membership through our Operating Engineer Pathway in the OE High School Pathway Program. A 4-course virtual high school curriculum that works to create opportunity for all Minnesota high school students to find a career as an Operating Engineer. Local 49 also co-administers the Building Strong Communities (BSC) Program, a multi-trade apprenticeship preparatory program. Over 80% of BSC program participants are women and/or from BIPOC communities and 42% of the participants in the current 2021 cohort are female. Women Building Success, of which our Local 49 Women's group is a partner, financially sponsors females through the Building Strong Communities program. Finally, we work in partnership with Five Skies Training Program and the Indigenous Communities to build pathways to careers in our industry. Through Xcel Energy's internal efforts and its use of union labor, for the projects covered by this IRP, the pathway to careers in the energy sector will become more inclusive and equitable.

As many of the comments in this docket have stated the loss of legacy energy facilities is a somber and serious prospect and should not be taken lightly. At Local 49 we applaud the work and consideration Xcel Energy has put into minimizing the localized negative affects of this IRP's proposed actions. We are thankful for the opportunity to comment on this docket and would like to convey our strong support for Xcel Energy's proposed 2020-2034 Upper Midwest Integrated Resource Plan.

Thank you for your time and consideration.

Nathaniel J Runke

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Regulatory & Political Affairs Coordinator

International Union of Operating Engineers, Local 49