

**Comments from Operating Engineers Local 49 and North Central States Regional Council
of Carpenters**

Aug 8, 2023

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

RE: In the Matter of Great River Energy's 2022-2036 Integrated Resource Plan ET2/RP-22-75

Dear Mr. Seuffert,

As labor unions representing workers in the construction industry and their families we respectfully submit these comments on Great River Energy's ("GRE") proposed Integrated Resource Plan (IRP).

The International Union of Operating Engineers Local 49 (IUOE Local 49) represents more than 12,000 Operating Engineers and their families in Minnesota, along with members in North and South Dakota. Their members include heavy equipment operators and mechanics, along with stationary engineers. The North Central States Regional Council of Carpenters (Carpenters) represents approximately 12,000 workers and their families across Minnesota, along with members in Wisconsin, Iowa, Nebraska, North Dakota and South Dakota. Their members include carpenters, millwrights, floor coverers, lathers, pile drivers, and industrial workers across the state. Both unions work on a wide array of energy infrastructure construction and maintenance projects—including coal plants, natural gas plants, nuclear plants, wind and solar. This work includes the initial construction of large projects, but also ongoing maintenance at large coal and nuclear plants which serves as a major source of income for many of our members

We appreciate the opportunity to review GRE's IRP. As noted in the IRP filing, GRE's preferred plan reflects an ongoing transition within their generation portfolio from primarily carbon-emitting resources to primarily renewable resources. The addition of new wind resources in the near term will provide good job opportunities for union construction workers in the coming years, as well as provide low-cost electricity generation for GRE members. While the power purchase agreement with Rainbow Energy Center will be adjusted downward in the coming years, the continued operation of the facility does provide good ongoing job opportunities for our members in North Dakota and allows the facility to explore the installation of carbon capture technology. Additionally we are excited about the feasibility study for pumped hydro storage in northeastern Minnesota. We have many members in the iron range area, and the construction of a large pumped hydro facility would provide significant work opportunities for them. Overall, the

proposed plan represents an important step in an ambitious and responsible transformation of GRE's electricity generation portfolio.

For the above reasons we support GRE's proposed plan. Thank you for considering these comments.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating Engineers Local 49

Adam Duininck, Director of Government Affairs, North Central States Regional Council of Carpenters