

## **Mankato Building Trades Comments on Proposed Flying Cow Wind Project in Yellow Medicine County (IP-6984 - CN 17-676 - WS 17-749)**

The Mankato Building and Construction Trades Council appreciates the opportunity to comment on the 152 MW wind energy project proposed by Flying Cow, 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 Flying Cow, LLC and parent company RES Americas have made or are willing to make going forward regarding local hiring and safety; and to require Flying Cow, LLC 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 RES Americas 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 like Hendricks and Lake Benton and Pipestone and Slayton and Tracy 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

### ***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 RES Americas'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.

But if, by securing a Power Purchase Agreement with a local utility, the project displaces another that would have employed 50 local workers, then the true impact would be a loss of 49 jobs. This is especially relevant in the case of Flying Cow Wind, LLC, which is presumably competing with other sources of power since the project evidently lacks a PPA.

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 RES Americas 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 require RES Americas to provide 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 unique characteristics of the proposed site or the project that should be considered?***

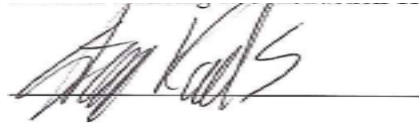
Unlike Minnesota wind contractors such as Mortenson and Blattner, we are not aware that RES Americas, which is based in Colorado, has a meaningful Minnesota workforce at its disposal. Further, the company's work on the Copenhagen wind project in northern New York generated controversy over allegations that the company failed to make sufficient efforts to hire local workers. These concerns make it doubly important that the PUC and DOC investigate the company's plans and past record with regard to local construction hiring.

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

There is very little information in the application with regard to RES Americas' plans regarding staffing and safety during the construction phase of the project. It is also unclear from the application from whom project is securing a Power Purchase Agreement and what impact that might have on competing proposals.

Dated: March 19, 2018

Respectfully Submitted,  
Mankato Building & Construction Trades Council

A handwritten signature in black ink, appearing to read "Stacey Karels", is written over a horizontal line.

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