



LiUNA!

**LABORERS DISTRICT COUNCIL
MINNESOTA AND NORTH DAKOTA**

Affiliated with Laborers International Union
of North America

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TIMOTHY MACKEY
President & Business Manager

**Petition to Intervene in the application for a Site Permit for the Merricourt Wind Power
Project (ND PSC Docket No. PU-08-932/OAH File No. 20170176)**

September 1, 2017

Mr. Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Avenue, Dept. 408
Bismarck, ND 58505-4080



Dear Mr. Nitschke:

Pursuant to North Dakota Administrative Code 69-02-02-05, the Laborers District Council of Minnesota and North Dakota ("Laborers Union") herewith submits its Petition to Intervene in the above referenced dockets. If you have any questions, please feel free to contact me at 612.224.6464 or kpranis@liunagroc.com.

Sincerely,

Kevin Pranis
Marketing Manager

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Petition to Intervene

Laborers District Council Minnesota and North Dakota
Kevin Pranis, Marketing Manager

NORTH DAKOTA PUBLIC SERVICE COMMISSION

<p>In the Matter of the Application for a Siting Permit for the Merricourt Wind Power Project in Dickey and McIntosh Counties, North Dakota</p> <p>ND PSC Docket No. PU-08-932</p> <p>OAH File No. 20170176</p>	<p>Petition for Intervention</p> <p>Laborers' District Council of Minnesota And North Dakota</p>
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The Laborers' District Council of Minnesota and North Dakota ("Petitioner") hereby petitions for intervention as a party in the above-captioned dockets for a Siting Permit for the Merricourt Wind Power Project (the "Project") that is proposed to be constructed by EDF Renewable Development, Inc. ("EDF") pursuant to NDAC 69-02-02-05.

Petitioner 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. Petitioner is also 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. Petitioner's principal place of business is located at 81 East Little Canada Road in Little Canada, Minnesota.

Petitioner 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.

Petitioner's legal rights, duties, or privileges may be affected by the outcome of this contested case for the following reasons:

- The union members represented by Petitioner, together with their families and communities, have an interest in the construction jobs that could be created if the Commission approves the revisions proposed by EDF for the Merricourt Wind Power Project.
- The union members represented by Petitioner, together with their families and communities, have an interest in the power plant construction and maintenance jobs that could be directly by the Commission's decision to the revised proposal put forth by EDF for the Merricourt Wind Power Project.
- The union members represented by Petitioner, together with their families and communities, have an interest in the reliability and affordability of regional power supplies, which could be affected by the Commission's decision to the revised proposal put forth by EDF for the Merricourt Wind Power Project.
- The union members represented by Petitioner, together with their families and communities, 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 pipeline infrastructure at both policy and the project levels.
- The union members represented by Petitioner have an interest in the safety of energy infrastructure construction workers, and in efforts to protect workers from construction hazards that can arise on projects such as the revised proposal put forth by EDF for the Merricourt Wind Power Project.

The Laborers Union seeks intervene in of the abovementioned case in order to protect the rights and welfare of our members, families and communities, and to ensure that the project can proceed in a manner that benefits both skilled construction workers, the general public, and North Dakota's energy industry. At this point, we are not taking a position for or against the application.

Petitioner seeks party status in order to share our perspective and our expertise with the North Dakota Public Service Commission and the other parties to this case in order to:

- Determine how the revised proposal how the proposal might affect our members, including members employed in both wind construction and conventional power generation.
- Explain best practices in siting and construction of wind energy facilities that we believe can best safeguard the integrity of the assets, maximize efficient use of resources, and minimize disturbance to the environment and landowners.
- Ensure that the revised proposal will minimize adverse impacts, contribute to meeting energy needs in an orderly fashion, and represent a beneficial use of North Dakota's energy resources.

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.

Petitioner has reviewed the requirements of NDAC 69-02-02 and is prepared to participate in the process as required by the Administrative Law Judge.

Dated: September 1, 2017

Respectfully Submitted,

Laborers District Council of Minnesota & North Dakota



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