



NORTH DAKOTA STATE BUILDING AND CONSTRUCTION TRADES COUNCIL

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October 18, 2018

Darrell Nitschke
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard Bismarck, ND 58505-0480

The North Dakota State Building & Construction Trades Council wish to have the Public Service Commission and Northern States Power Company and Xcel Energy to consider in the case of the Advance Determination of Prudence (ADP) application of PU-17-120 and PU-17-372 the following:

While we applaud the company's desire to bring low cost resource electrical generation facilities in this application for prudence, we wish to cite the numerous skilled Union craftsmen and women who live and work in North Dakota that could be adversely affected by the introduction of this new source of generation to the market. The proposed 1,852 megawatts of electricity has the potential to negatively impact our members who already work in maintaining existing traditional coal-fired generation facilities. On a consistent basis, careers in coal-fired generation have been the leading economic generator for many North Dakota citizens for decades. The amount of proposed generation in this case, if it were to be introduced as coal-fired generation, would put numerous skilled construction members of the Building Trades Unions to work in high-paying careers fields for generations to come. It is worth noting, 1,852 MW of generation is larger than any existing power plant in North Dakota and represents 48% of all coal-fired nameplate capacity for the combined power plants in the North Dakota fleet. Instead, this generation will be incorporated into the MISO network over several facilities in North Dakota, South Dakota, Minnesota and Iowa potentially impacting traditional electrical generation methods because of lowest cost resource directive of the MISO network.

As stated in their testimony, Northern States Power Company will be able to provide its customers a low-cost energy source along with a significant cost savings to the company. However, this goal should not sacrifice existing coal-fired generation careers for the construction industry. Consideration should be given to use of Building Trades Union members when constructing and maintaining the numerous wind-generation facilities involved with this case, including self-build, build-own-transfer or power purchase agreement facilities. Being spread out over several states and minimal maintenance initially, we ask the company to work with the

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organizations of the State Building Trades Unions so that our members livelihoods are not eliminated in traditional generation. Providing the opportunity to construct and maintain these new facilities to our members will help offset any loss in coal-fired generation. Wind Turbine generation should contribute to the local communities and economies in high-paying, highly skilled Union careers like coal-fired has done for decades.

We ask the commissioners and staff of the Public Service Commission, Northern States Power Company and Xcel, utilize the Union Labor force that is established in traditional forms of generation for the construction of renewable generation facilities in this Advance Determination of Prudence application.

Please feel free to contact me at (701) 541-2989 or Jason@ndbtu.org should you have any questions.

With kind regards,

A handwritten signature in black ink, appearing to read "Jason Ehlert", with a long horizontal flourish extending to the right.

Jason Ehlert
President
North Dakota Building Trades Unions