

NORTH DAKOTA PUBLIC SERVICE COMMISSION

<p>In the Matter of Applications for Siting and Route Permits for Northern Divide Wind Project and Associated Transmission Facilities - Burke and Mountrail Counties</p> <p>ND PSC Docket No. PU-19-376 &amp; 19-377</p> <p>OAH File Nos. 20200007 and 20200008</p>	<p>Petition for Intervention Laborers District Council of Minnesota and North Dakota</p>
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The Laborers District Council of Minnesota and North Dakota (“LIUNA Minnesota & North Dakota”) hereby petitions for intervention as a party in the above-captioned dockets for Certificates of Site Compatibility and Route Compatibility and a Route Permit for the Northern Divide Wind Project and associated transmission facilities (the “Project”) that are proposed to be constructed by Northern Divide Wind, LLC (“Applicant”) 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 (LIUNA), 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 or denies Applicant’s petitions.

- 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 approve or deny Applicant's petitions.
- 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 approve or deny Applicant's petitions.
- 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 energy infrastructure at both policy and 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 proposed Project.

LIUNA Minnesota & North Dakota seeks to intervene in the above-mentioned 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.

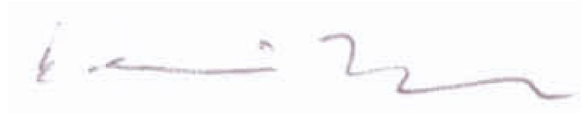
No other party to the proceedings can adequately represent the interests of our union and our members, or provide our unique insights on the proposed project as set forth above.

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: April 2, 2020

Respectfully Submitted,

Laborers District Council of Minnesota & North Dakota



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