

Jeffrey D. Gritz | *Business Manager/Secretary-Treasurer* | [jgritz@osidcl.org](mailto:jgritz@osidcl.org)

August 19, 2021

**VIA E-MAIL**

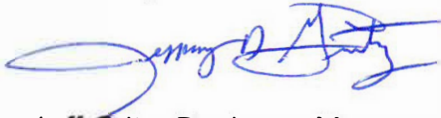
Oregon Public Utility Commission  
201 High Street SE, Suite 100  
Salem, OR 97301-3398  
[puc.filingcenter@puc.oregon.gov](mailto:puc.filingcenter@puc.oregon.gov)

**Re: In the Matter of PACIFICORP, dba PACIFIC POWER, Application for Approval  
of 2020 All-Source Request for Proposal, UM 2059**

Dear Chair Decker, Commissioner Tawney, and Commissioner Thompson:

On behalf of the Oregon and Southern Idaho District Council of Laborers, please find our comments in the case referenced above.

Sincerely,



Jeff Gritz, Business Manager/Secretary Treasurer  
Oregon & Southern Idaho District Council  
17230 NE Sacramento Street, Suite 201  
Portland, OR 97230  
Phone: 541-801-2221 x 2221

Enclosures

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**BEFORE THE PUBLIC UTILITY COMMISSION  
OF OREGON**

**UM 2059**

In the Matter of  
PACIFICORP, dba PACIFIC POWER,  
Application for Approval of 2020 All-Source  
Request for Proposals.

COMMENTS OF OREGON  
& SOUTHERN IDAHO  
DISTRICT COUNCIL OF LABORERS

**Introduction**

The Oregon & Southern Idaho District Council of Laborers (“LIUNA”) hereby submit these comments on PacifiCorp’s Final Shortlist and the Independent Investigator’s (“IE”) closing/sensitivity reports in response to the Scheduling Update issued July 29, 2021. In Oregon, LIUNA represents over 4,000 members who are primarily employed in the construction industry. LIUNA members work approximately a quarter million hours annually building and maintaining the state’s conventional energy resources, and have been long-time construction partners in ensuring safe and reliable electric and gas service.

PacifiCorp’s solicitation for 3,245 MW of wind and solar resources and 735 MW of battery storage creates risks and benefits for Oregon residents, workers, and the state and local economies. The IE’s and PacifiCorp’s analyses model certain price-based risk factors but completely ignore other benefits and risks. Moreover, the sensitivity models do not reflect the new regulatory framework for clean energy development in Oregon. Legislators recently passed House Bill 2021 establishing 100% clean energy by 2040, bans on coal and gas power plants, and community benefits and labor standards for construction employees on those projects. In addition, the Governor’s Executive Order No. 20-04 directed state agencies to reduce greenhouse gas emissions, and prioritize help to impacted communities. The analyses in this case fail to reflect these broader public policy and equity considerations. The analyses’ primary focus on price-based factors at the detriment of other broader public interest objectives is short-sighted. LIUNA urges the Commission to reject the Final Shortlist and modify PacifiCorp’s Request for Proposal (“RFP”) in order to maximize net benefits to Oregon communities.

## Discussion

We offer three observations for your consideration. First, of the 19 projects in the Final Shortlist, only 2 are located in Oregon. The absence of projects in Oregon means workers and the communities they support will not benefit from employment opportunities created by PacifiCorp's historic capital investment. This is significant for several reasons. First, the energy transition may potentially shift the balance of in-state versus out-of-state resources which may result in a net loss of blue-collar, middle-class jobs for Oregon residents. Moreover, because wind and solar projects require minimal operational personnel, the primary economic benefits flow during the construction phase. Nearly all, 84 percent of the resources in the Final Shortlist, are power purchase agreements ("PPAs") for new plants in Utah and Wyoming. Because PPAs are long-term contracts spanning 25 to 30 years, the extent to which this solicitation may preclude future development of clean energy resources in the state should be examined. Failing to consider the comprehensive value and benefits of projects from an economic and employment perspective is inconsistent with Oregon's stated clean energy objectives. Recent solar projects completed in 2021 demonstrate the state's capacity for generating clean power. The Commission should modify the RFP and award higher scores to projects located in the state and who employ local workers.

*Table 1: PacifiCorp 2020AS RFP Final Shortlist by State*

| State       | Projects | Sum of Resource Capacity (MW) |
|-------------|----------|-------------------------------|
| Idaho       | 1        | 151                           |
| Oregon      | 2        | 210                           |
| Utah        | 10       | 1,243                         |
| Wyoming     | 6        | 1,641                         |
| Grand Total | 19       | 3,245                         |

*Table 2: Solar Projects Completed in 2021 in Oregon<sup>i</sup>*

| Project Name            | Project Owner(s)         | New Capacity (MW) | Estimated Construction Cost (\$000) |
|-------------------------|--------------------------|-------------------|-------------------------------------|
| Bristol Solar Project   | Adapture Renewables      | 2.97              | \$ 5,643                            |
| Dunn Road Solar Project | Neighborhood Power Corp. | 1.8               | \$ 3,420                            |

| <b>Project Name</b>          | <b>Project Owner(s)</b>     | <b>New Capacity (MW)</b> | <b>Estimated Construction Cost (\$000)</b> |
|------------------------------|-----------------------------|--------------------------|--|
| Milford Solar Project (OR)   | Milford Solar               | 3                        | \$ 5,700                                   |
| Millican Solar Project       | Invenergy LLC               | 45                       | \$ 108,000                                 |
| Mount Hope Solar Project     | Neighborhood Power Corp.    | 2.5                      | \$ 4,750                                   |
| PNW Butler Solar Project     | Pacific Northwest Solar LLC | 4                        | \$ 7,600                                   |
| Prineville Solar Project     | Invenergy LLC               | 46.2                     | \$ 60,060                                  |
| Williams Acres Solar Project | Neighborhood Power Corp.    | 2.5                      | \$ 4,750                                   |
|                              |                             |                          |  |
| <b>Total</b>                 |                             | <b>107.97</b>            | <b>\$ 199,923</b>                          |

Second, the Final Shortlist fails to provide any solutions for Oregon’s workforce who will lose their livelihoods in the transition from conventional to clean power, and fails to address how clean energy opportunities support broader policy objectives to reduce racial and gender inequities. Oregon’s conventional energy workers *are* an impacted community, and it’s our position a transition from fossil fuels to clean energy requires interventions that do not leave skilled workers and marginalized communities behind. In fact, when legislators and regulators fail to consider labor standards, developers are incentivized to employ a lowest cost, lowest skill workforce model. Wind and solar developers frequently use temporary staffing agencies that pay wages as low as \$15 per hour with no or limited benefits. Conventional power jobs, on the other hand, have provided thousands of blue-collar workers with a path to the middle class for decades. Indeed, recent reports tie the rise in renewable power with a decrease in overall wages for the energy workforce.<sup>ii</sup> Moreover, the inequity between renewable power jobs and fossil fuel jobs does not only impact workers and their families, but it creates headline risks for utilities and power producers. Developers who fail to engage affected communities may expose customers to additional risks or foment local opposition to the project.

Through HB 2021, legislators have given the Commission a blueprint for labor standards on clean power projects. The standards cover construction contractors and subcontractors on projects greater than 10MW and establish the following: 1) 15% apprenticeship utilization goal; 2) 15% workforce equity goal for hiring women, BIPOC workers, veterans, and people with disabilities; 3) requirement that contractors provide a positive job site culture program, area wage



standards consistent with current prevailing wages, and health and retirement benefits; 4) requirement that all contractors validate compliance with state and federal laws; and 5) promotion of the use of a pre-hire agreement (“Project Labor Agreement”) that establish wage and benefit levels for workers on the project. LIUNA urges the Commission to apply these labor standards to the Final Shortlist projects. At a minimum, the Commission should require PacifiCorp collect data on these 5 standards from developers and their contractors.

Lastly, LIUNA urges the Commission to adopt a best value approach to scoring bids instead of a lowest cost method for new electric resource additions. As the IE aptly noted, the costs alone of the portfolio of projects does not capture the full picture of risks for ratepayers. As evidenced by the announcement that one of the developers of two projects on the Final Shortlist, DE Shaw, is withdrawing its 147MW Steel Solar I and II 37.5MW BESS project in Utah, there are numerous factors that determine the viability of a project. Importantly, the IE noted that the policy and regulatory context for renewable energy development has a greater impact on outcomes than the actual bids selected from the RFP.

Other state utility commissions have approved utility RFPs that take a less complicated, more direct approach to ensuring quality jobs through explicit labor commitments. These provide a model for best practices to ensure a clean energy transition creates prosperity for all, and leaves no communities behind. LIUNA urges the Commission to require PacifiCorp to establish explicit labor standards in future RFPs if it does not act in this case. Table 3 summarizes model labor language utilities can adopt.

*Table 3: Language from Utility Requests for Proposals for Electric Resource Additions*

| Utility or IPP     | Labor Language   | Power Source                       |
|--------------------|--|------------------------------------|
| Puget Sound Energy | PSE prefers projects that utilize a Project Labor Agreement or Community Workforce Agreement for major construction activities associated with the construction of the project. Respondents shall make commercially reasonable efforts to ensure that such Project Labor Agreement or Community Workforce Agreement is eligible to be certified by the | 2021 All Source RFP <sup>iii</sup> |

| Utility or IPP               | Labor Language  | Power Source   |
|------------------------------|---|--|
|                              | Washington Department of Labor and Industries under the standards of the Washington State Clean Energy Transformation Act (RCW 19.405).   |  |
| Xcel Minnesota               | The Company seeks an RFP Project that utilizes labor covered by a collective bargaining agreement for its construction and ongoing operation and maintenance and requires the bidders to provide pricing in the Bidder Form 4 that assumes the use of such labor.   | 2021 Minnesota Sherco Solar RFP <sup>iv</sup>        |
| NV Energy                    | 3.2.6.6 Work Site Agreement Plan A pro forma work site agreement (“WSA”) is attached as Attachment N to this RFP. This form may be modified based on the applicable unions and their associated master agreements. The form of WSA, as modified, or an executed WSA, is to be inserted in the applicable exhibit of the agreement being proposed. Bidders who take exception to the terms of the WSA agreement must provide a mark-up of the agreement, including Bidder’s proposed language. In addition, a statement of acceptance of the agreement as written, or explanation of each exception must be provided within the proposal. Please note that the WSA agreement is between Bidder and the union(s), not Bidder’s contractor. Bidders that advance to the initial shortlist shall commence discussions with the unions immediately following notice of shortlisting. Bidders that advance to the final shortlist are required to provide weekly updates on the status of their WSA negotiations with the union(s). Bidders must provide an executed WSA, with Nevada union(s), prior to or at the time of execution of the RFP agreement. Bidder must be a signatory on the WSA. If Bidder elects to contract with an EPC, the EPC will be required to comply with the terms of the WSA. | Fall 2020 Renewable Energy Bid Protocol <sup>v</sup> |
| Indiana Michigan Power (AEP) | A Building and Construction Trades Unions approved project labor agreement (Project Labor Agreement) must be initiated prior to commencement of physical work activities and utilized for the construction of the Project.  | 2020 Solar and Wind RFQ for 150 MW <sup>vi</sup>     |

| Utility or IPP    | Labor Language  | Power Source   |
|-------------------|---|--|
| Appalachian Power | 3.6.7. Construction Labor: APCo has a preference that Bidders use union labor with an affiliation to the Building and Construction Trade Unions for the site preparation and construction of the Project.   | 2021 300 MWac of Solar and or Wind Energy Resources <sup>vii</sup>   |
| Appalachian Power | 3.7.4. A project labor agreement must be utilized for the construction of the Project (see Exhibit F of the Form REPA – “National Maintenance Agreement”).  | 200MW of Solar, 2019 <sup>viii</sup>   |
| NYSERDA           | As referenced here, a PLA refers generally to a single collective bargaining agreement (including a prehire agreement) covering both contractors in the construction industry working on a Project and a bona fide building and construction trade labor organization representing the craft workers on that Project. Because of the benefits to the timeliness of project completion, Section 18.11 of the Agreement requires any Project selected for award to negotiate for a PLA. Proposers also will receive higher Project Viability scores by providing documentation of a PLA or an MOU to execute a PLA, or a firm commitment to enter into a PLA that covers construction of infrastructure necessary to generate and deliver the energy and Tier 4 RECs to Zone J. Proposers of Projects located outside Zone J should also explain whether the developer of the New Transmission, on which the overall timeliness of the Project depends, intends to enter a PLA and whether that intention has been memorialized in any agreement or MOU.” | Purchase of New York Tier 4 Eligible Renewable Energy Certificates (RECs) Request for Proposals (RFP) No. T4RFP21-1 RFP Release Date: January 13, 2021 <sup>ix</sup> |

## Conclusion

The transition away from carbon to clean energy presents Oregon with a once-in-a-generation opportunity to build a more just and sustainable society as well as help meet the challenges of the global climate crisis. Oregon’s energy transition must be consistent with the state’s broader vision. Not only must the energy be carbon-free, but the projects must promote equity for affected workers and marginalized communities. Ignoring stranded communities and

workers will make climate progress far more challenging, slower and less sustainable than it would otherwise be if done right.

LIUNA has communicated with developers and PacifiCorp to express our concerns with the Final Shortlist, but to date, we have not received a single response (the letters are included in the appendix). Without explicit leadership from the Commission, inferior renewable energy jobs outside of Oregon may replace middle-class energy jobs in Oregon and create risks for future investment. Oregon's energy future will be shaped by actions today. LIUNA urges the Commission to evaluate the Final Shortlist comprehensively for net benefits and costs which include consideration of workforce and equity issues envisioned by state policy.

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<sup>i</sup> Power Plant Database, S&P Capital IQ, accessed August 2021.

<sup>ii</sup> See, for example: <https://www.nytimes.com/2021/07/16/business/economy/green-energy-jobs-economy.html?referringSource=articleShare> and <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/some-clean-power-wages-lag-other-energy-jobs-but-above-us-median-report-finds-63534677>.

<sup>iii</sup> Puget Sound Energy, "2021 All-Source RFP for Renewable and Peak Capacity Resources, June 8, 2021, [https://www.pse.com/-/media/PDFs/001-Energy-Supply/003-Acquiring-Energy/000\\_main\\_All-Source-RFP\\_6821.pdf?sc\\_lang=en&hash=0B6E401A537958A33C4D3D45FCF3B694](https://www.pse.com/-/media/PDFs/001-Energy-Supply/003-Acquiring-Energy/000_main_All-Source-RFP_6821.pdf?sc_lang=en&hash=0B6E401A537958A33C4D3D45FCF3B694).

<sup>iv</sup> Northern States Power Company-Minnesota, "2021 Sherco Solar Resource Solicitation Request for Proposals," January 4, 2021, <https://www.xcelenergy.com/staticfiles/xcelresponsive/Company/Rates%20&%20Regulations/Regulatory%20Filings/Sherco-Solar-RFP-Document.pdf>.

<sup>v</sup> NV Energy, "Bid Protocol Fall 2020 Renewable Energy Request for Proposals, October 27, 2020, [https://www.nvenergy.com/publish/content/dam/nvenergy/brochures\\_arch/about-nvenergy/doing-business-with-us/energy-supply-rfps/2020-fall-renewable-energy-request-for-proposals/2020-fall-re-rfp-protocol.pdf](https://www.nvenergy.com/publish/content/dam/nvenergy/brochures_arch/about-nvenergy/doing-business-with-us/energy-supply-rfps/2020-fall-renewable-energy-request-for-proposals/2020-fall-re-rfp-protocol.pdf).

<sup>vi</sup> American Electric Power Service Corporation as agent for Indiana Michigan Power Company, "Request for Proposals - PPA from Qualified Bidders Totaling up to 150 MWac of nameplate rated Solar Energy Resources and/or Wind Energy Resources, November 5, 2020,

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[https://www.indianamichiganpower.com/lib/docs/business/b2b/rfp/im/2020SolarWind/IM\\_Wind\\_Solar\\_RFP\\_110520\\_Final\\_PPA.pdf](https://www.indianamichiganpower.com/lib/docs/business/b2b/rfp/im/2020SolarWind/IM_Wind_Solar_RFP_110520_Final_PPA.pdf).

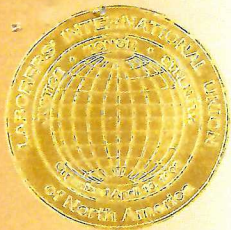
vii American Electric Power Service Corporation as agent for Appalachian Power Company, “Request for Proposals - PSA from Qualified Bidders Totaling up to 300 MWac of nameplate rated Solar Energy Resources and/or Wind Energy Resources,” February 15, 2021, [https://www.appalachianpower.com/lib/docs/business/b2b/rfp/APCO/2021WindSolar/2021\\_AP\\_CO\\_PSA\\_RFP\\_02152021\\_2.0.pdf](https://www.appalachianpower.com/lib/docs/business/b2b/rfp/APCO/2021WindSolar/2021_AP_CO_PSA_RFP_02152021_2.0.pdf).

viii American Electric Power Service Corporation as agent for Appalachian Power Company, “Request for Proposals from Qualified Bidders Totaling up to 200 MWac of nameplate rated Solar Energy Resources,” November 15, 2018.

ix New York State Energy Research and Development Authority (NYSERDA), “Purchase of New York Tier 4 Eligible Renewable Energy Certificates (RECs) Request for Proposals (RFP) No. T4RFP21-1,

January 13, 2021, <https://portal.nyserda.ny.gov/servlet/servlet.FileDownload?file=00Pt000000RfWV4EAN>.

# Appendix



TERRY O'SULLIVAN  
*General President*

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*General Secretary-Treasurer*

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July 1, 2021

Luigi Resta, President/Project Developer  
rPlus Energies LLC  
201 South Main Street Suite 200  
Salt Lake City, Utah

Re: Green River I & II Projects, Utah

Dear Mr. Resta,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

It would be a huge wasted opportunity to not specifically plan to ensure the jobs created by PacifiCorp's 2020 All Source RFQ help smooth the transition for workers and their families who are losing good jobs in the coal industry. The unprecedented size of the RFP will create thousands of construction jobs that could make a difference in how citizens in the affected states think about renewable energy and the opportunity it represents.

The alternative is that broader host communities don't benefit from the economic opportunity created and anti- renewable energy sentiment spreads as communities deal with the downsides of large scale energy infrastructure development without the corresponding job creation benefits (besides the lease payments to individual landowners)

This is a real possibility-- After conducting a survey in June 2021 of renewable energy projects in the Northwest, we are concerned that the wind and solar industries lag fossil fuels in both wages, benefits, and percentage of local hires coming from host communities. (The exception to this is where projects are covered by union collective bargaining agreements. Then wages and benefits are approximately the same as fossil

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fuel infrastructure projects) Non- union solar laborers face especially brutal conditions with pay as low as \$15/hour and no benefits for often grueling work. Non Union wind farm construction contractors often hire few local workers with estimated local hiring rates as low as 10% based on our past experience.

LIUNA's NW Region respectfully requests that we arrange a time to discuss the following principles that could be a framework for responsible development on your project.

- 1) Use of a community benefits agreement that targets recruitment of construction workers who have worked on fossil fuel infrastructure projects in the past
- 2) Construction wage and benefit levels as good as those being lost at coal plants that are closing.
- 3) A commitment to local hiring of state residents for at least 70% of jobs created on the project and
- 4) A prohibition on the use of temporary staffing agencies to supply craft labor to the projects as it is shown to cause greater health and safety risks to workers who are employed via staffing agencies compared to direct hires.

On behalf of our Region, I hope we can count on you as a partner. With pending changes at the federal level related to labor conditions attached to federal tax credits, I believe this is a perfect time to begin discussions. I can be reached at [rabbott@liuna.org](mailto:rabbott@liuna.org) or (206) 441-6507

Sincerely,



Robert F. Abbott

LIUNA Vice President and Regional Manager

/rr

cc: Tom Davidson, Business Manager/Secretary-Treasurer

Local Union 295

Stefan A. Bird, President and Chief Executive Officer of Pacific Power

PacifiCorp

Gary W. Hoogeveen, President and Chief Executive Officer of Rocky Mountain Power

PacifiCorp





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July 1, 2021

Michael Blazer,  
Senior Vice President and Chief Legal Officer  
Invenergy  
One South Wacker Drive Suite 1800  
Chicago, Illinois, 60606

Re: Rock Creek I and Rock Creek II Projects, Wyoming

Dear Mr. Blazer,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

It would be a huge wasted opportunity to not specifically plan to ensure the jobs created by PacifiCorp's 2020 All Source RFQ help smooth the transition for workers and their families who are losing good jobs in the coal industry. The unprecedented size of the RFP will create thousands of construction jobs that could make a difference in how citizens in the affected states think about renewable energy and the opportunity it represents.

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bargaining agreements. Then wages and benefits are approximately the same as fossil fuel infrastructure projects) Non- union solar laborers face especially brutal conditions with pay as low as \$15/hour and no benefits for often grueling work. Non Union wind farm construction contractors often hire few local workers with estimated local hiring rates as low as 10% based on our past experience.

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Sincerely,



Robert F. Abbott

LIUNA Vice President and Regional Manager

/rr

cc: John Fulk, Business Manager/Secretary-Treasurer  
Local Union 1271

Stefan A. Bird, President and Chief Executive Officer of Pacific Power  
PacifiCorp

Gary W. Hoogeveen, President and Chief Executive Officer of Rocky Mountain Power  
PacifiCorp





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July 1, 2021

Michael Koralewski, Vice President of Operations  
First Solar Incorporated  
28101 Cedar Park Blvd.  
Perrysburg, Ohio 43551 USA

Re: Parowan Project, Utah

Dear Mr. Koralewski,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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Sincerely,



Robert F. Abbott

LIUNA Vice President and Regional Manager

/rr

cc: Tom Davidson, Business Manager/Secretary-Treasurer

Local Union 295

Stefan A. Bird, President and Chief Executive Officer of Pacific Power

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Seattle, WA 98168-5121

Phone: (206) 441-6507 • Fax: (206) 728-2608

July 1, 2021

Chris Clevenger, COO  
DE Shaw Renewables  
1166 Avenue of the Americas,  
New York, NY 10036

Re: Steel Solar I & II and Rocket Solar II Projects, Utah

Dear Mr. Clevenger,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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cc: Tom Davidson, Business Manager/Secretary-Treasurer

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July 1, 2021

**Eric Stoutenberg, Chief Development Officer**  
**Able Grid Energy Solutions**  
1495 Canyon Boulevard Suite 218  
Boulder, CO 80302

**Re: Domingues I Projects, Oregon**

Dear Mr. Gorman,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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LIUNA Vice President and Regional Manager

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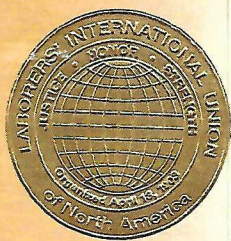
cc:: Tom Davidson, Business Manager/Secretary-Treasurer

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July 1, 2021

Gareth McDonald, Development Manager  
BluEarth Renewables Incorporated  
214-11 Avenue Southwest #400  
Calgary, Alberta T2R 0K1 Canada

Re: Two Rivers Project, Wyoming

Dear Mr. McDonald,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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cc: John Fulk, Business Manager/Secretary-Treasurer

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July 1, 2021

Greg Probst, Project Development & Land Acquisition/Principal  
Christine Mikell, Project Development & Land Acquisition/Principal  
Enyo Renewable Energy  
Longroad Energy Holdings  
133 Federal Street Suite 1202  
Boston, MA 02110

Re: Hornshadow I and Hornshado II Projects, Utah

Dear Mr. Probst and Ms. Mikell,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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cc: Tom Davidson, Business Manager/Secretary-Treasurer

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July 1, 2021

**John DiDonato, Vice President**  
Renewable Development and Organization  
NextEra  
700 Universe Blvd.,  
Juno Beach, FL 33463

Re: Anticline and Cedar Springs IV Projects, Wyoming

Dear Mr. DiDonato,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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July 1, 2021

John Gorman, Chief Executive Officer  
EcoPlexus, Inc.  
101 2nd Street Suite 1250  
San Francisco, CA 94105

Re: Hamaker and Hayden 2 Projects, Oregon

Dear Mr. Gorman,

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cc: Jeff Gritz, Business Manager/Secretary-Treasurer  
Oregon and Southern Idaho District Council of Laborers  
Zack Culver, Business Manager/Secretary-Treasurer  
Local 737  
Stefan A. Bird, President and Chief Executive Officer of Pacific Power  
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July 1, 2021

Matt Kearns, Chief Development Officer  
Longroad Energy Holdings  
133 Federal Street Suite 1202  
Boston, MA 02110

Re: Fremont and Rush Lake Projects, Utah

Dear Mr. Kearns,

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- 4) A prohibition on the use of temporary staffing agencies to supply craft labor to the projects as it is shown to cause greater health and safety risks to workers who are employed via staffing agencies compared to direct hires.

On behalf of our Region, I hope we can count on you as a partner. With pending changes at the federal level related to labor conditions attached to federal tax credits, I believe this is a perfect time to begin discussions. I can be reached at [rabbott@liuna.org](mailto:rabbott@liuna.org) or (206) 441-6507

Sincerely,



Robert F. Abbott

LIUNA Vice President and Regional Manager

/rr

cc: Tom Davidson, Business Manager/Secretary-Treasurer

Local Union 295

Stefan A. Bird, President and Chief Executive Officer of Pacific Power  
PacifiCorp

Gary W. Hoogeveen, President and Chief Executive Officer of Rocky Mountain Power  
PacifiCorp





TERRY O'SULLIVAN  
*General President*

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SAMUEL STATEN, JR.

PAUL V. HOGROGIAN

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# LIUNA!

NORTHWEST REGIONAL OFFICE

12201 Tukwila International Blvd. • Suite 140

Seattle, WA 98168-5121

Phone: (206) 441-6507 • Fax: (206) 728-2608

July 1, 2021

Scott Caldwell, Senior Development Director  
Innergex Incorporated  
1225 Saint-Charles Street West 10th Floor  
Lanueuil, Quebec Canada J4K 0B9

Re: Boswell Springs Project, Wyoming

Dear Mr. Caldwell,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

It would be a huge wasted opportunity to not specifically plan to ensure the jobs created by PacifiCorp's 2020 All Source RFQ help smooth the transition for workers and their families who are losing good jobs in the coal industry. The unprecedented size of the RFP will create thousands of construction jobs that could make a difference in how citizens in the affected states think about renewable energy and the opportunity it represents.

The alternative is that broader host communities don't benefit from the economic opportunity created and anti- renewable energy sentiment spreads as communities deal with the downsides of large scale energy infrastructure development without the corresponding job creation benefits (besides the lease payments to individual landowners)

This is a real possibility-- After conducting a survey in June 2021 of renewable energy projects in the Northwest, we are concerned that the wind and solar industries lag fossil fuels in both wages, benefits, and percentage of local hires coming from host communities. (The exception to this is where projects are covered by union collective bargaining agreements. Then wages and benefits are approximately the same as fossil

*Feel the Power*

fuel infrastructure projects) Non- union solar laborers face especially brutal conditions with pay as low as \$15/hour and no benefits for often grueling work. Non Union wind farm construction contractors often hire few local workers with estimated local hiring rates as low as 10% based on our past experience.

LIUNA's NW Region respectfully requests that we arrange a time to discuss the following principles that could be a framework for responsible development on your project.

- 1) Use of a community benefits agreement that targets recruitment of construction workers who have worked on fossil fuel infrastructure projects in the past
- 2) Construction wage and benefit levels as good as those being lost at coal plants that are closing.
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Sincerely,



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LIUNA Vice President and Regional Manager

/rr

cc: John Fulk, Business Manager/Secretary-Treasurer

Local Union 1271

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July 1, 2021

Sean McBride, Project Developer

AES

2180 South 1300 East  
Salt Lake City, UT 84106

Re: Glen Canyon Project, Utah

Dear Mr. McBride,

Congratulations on your project's selection into PacifiCorp shortlist for its 2020 All-Source RFP. LIUNA's Northwest Region, affiliated with the Laborers International Union of North America- represents over 47,000 construction workers across PacifiCorp's service territory and our construction members have built wind and solar projects across the West. PacificCorp's transition from coal to renewables is painful for many workers and their families who have relied on family supporting jobs in the coal industry for decades.

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