May 3, 2017

To whom it may concern:

On behalf of the Midwest Region of the Laborers' International Union of North America (LiUNA), I would like to express our support of the Commission's draft rules relating to utility-scale solar and wind certification; specifically therein, the definition of "install."

The definition of "install" in the draft, like those which are used in the now-adopted regulations pertaining to distributed generation and electric vehicle charging stations, is limited to the "electrical wiring and connections necessary to interconnect the... project with the electric utility's distribution system..." Therefore, the certification requirements as drafted pertain only to that aspect of a utility-scale wind or solar project that transmits the power generated by these devices to the larger power grid.

That being the case, the laborers, operating engineers and other construction trades whose members have long been involved in the construction of utility-scale wind projects will be able to continue their work as they have done in erecting the thousands of wind turbines in Illinois to date. In fact, LiUNA members have worked an estimated 2 million hours constructing utility-scale wind projects in Illinois: they clearly have extensive experience in these projects. Further, our members throughout the country have a similar degree of experience in utility-scale solar projects.

Were we to make any suggestion to improve the definition of “install” it would be to add the term “construction” to the third exemption to the definition, in which case it would read thusly:

Tasks not associated with the electrical interconnection of the new solar or new wind project and the utility, including those relating to construction, planning and project management performed by individuals such as an inspector, management planner, consultant,
project designer, contractor or supervisor for the project or their employees.

The above suggestion would make the limitations of the term "install" abundantly clear. But, as long as the Commission's interpretation of "install" in the area of utility-scale solar and wind installations mirrors its interpretation of the rules governing distributed generation and electric vehicle charging stations it may be unnecessary.

Sincerely,

Sean T. Stott
Director of Governmental Affairs