Comments from the Maine Labor Climate Council on Changes and Upgrades to the Regional Electric Transmission System Needed to Integrate Renewable Energy Resources:

2. Comment on ways to minimize adverse impacts to ratepayers including, but not limited to, risk sharing, ownership and/or contracting structures including cost caps, modular designs, cost sharing, etc.

While the focus on minimizing financially adverse impacts on ratepayers is laudable, the economic focus should be twofold: 1) how do we minimize costs to ratepayers while we also, 2) ensure the maximum economic benefit to the people of New England. Additionally, rate payer impacts shouldn't be seen through the limited lens of the up front cost. Quality construction and planning can aid in saving money over time.

Furthermore, economic impacts shouldn't be the only impacts taken into account. Reliability and up-time of the transmission line should also be factored in. If the line fails at any time for any reason, that would certainly be an adverse impact on ratepayers. Not solely through the expense that would be incurred by the utility, and then passed onto ratepayers, for getting the line back into service, but also because the ensuing blackout would clearly be an adverse impact.

For these reasons, having a professionally skilled and trained workforce perform the work is imperative. The most effective way to ensure this workforce is to require a Project Labor Agreement (PLA) on the construction of the transmission line. PLAs have been shown to consistently ensure timely, cost effective construction with a well-trained labor force that avoids unnecessary construction delays.

At the same time, PLAs are an effective vehicle for ensuring the safety of workers engaged in transmission construction projects. In OSHA's Region 1, covering Maine, Vermont, New Hampshire, Massachusetts, Rhode Island, and Connecticut, union worksites had 30% fewer health and safety violations than nonunion worksites,[1] despite the fact that union worksites are 30% more likely to face health and safety inspections.[2] The union difference is pronounced because of the unique protections and training that union construction workers have on the job, including the freedom, empowerment and encouragement to speak up about unsafe conditions without fearing retaliation.[3] Further, union contracts typically include safety terms that promote safer jobsites, require comprehensive training, and mandate employer-provided personal protective equipment (PPE). Thus, with each one percent increase in unionization statewide, fatality rates decline by 3 percent.[4] Because the safety hazards in these industries are so great, and because the risks are significantly reduced at union worksites, the New England States Transmission initiative should take every opportunity to ensure that the workers performing

[1] *Id*., p. 7 (Figure 6)(OSHA found violations at 48.4% of union construction worksites inspected, compared with 63.1% of nonunion sites).
[2] Jimmy O'Donnell, "Essential workers during COVID-19: At risk and lacking union representation," *Brookings Institution*, September 3, 2020, https://www.brookings.edu/blog/up-front/2020/09/03/essential-workers-during-covid-19-at-risk-and-lacking-union-representation/.
[3] Manzo, et. al., p. 3.
[4] *Id*.

future jobs arising from this initiative have the advantages that come from being in a union. Requiring PLAs is the most straightforward way to achieve that goal.

8. Comment on any just-transition, environmental justice, equity, and workforce development considerations or opportunities presented by the transmission system buildout and how these policy priorities are centered in decisions to develop future infrastructure;

Concerns around social and environmental justice, equity, just-transition, and building the workforce of the future have to be paramount in the development of everything that we do as we build out the renewable energy economy. The electrification of our economy has the potential to be an enormous boon to our society. We can draw historically disadvantaged communities into the building trades, simultaneously building the workforce we need while bringing these underrepresented communities into careers that are truly family-sustaining.

According to the US Bureau of Labor Statistics only 1 in 10 construction workers are women. Non-hispanic Blacks comprise just over 1 in 20 construction workers. Non-Hispanic Asians are fewer than 1 in 50. Native Americans aren't included in the data.[5]We can address issues of wealth and income inequality at the same time we overcome the challenges of Global Climate Change. The Center for American Progress reports that in every demographic, the poverty rate for women is higher than for men. Additionally, blacks, hispanics, and native americans all have poverty rates around 20%. [6] Construction wages outpace the national median income[7], couple these facts and it becomes clear that bringing more people from these deeply underrepresented communities into construction would help reduce poverty amongst these groups. Furthermore, unionized construction workers do even better than their non-union counterparts[8]. Encouraging union labor on these projects will go a long way to reducing income inequality.

While the benefits that can be won from creating this new economy correctly are many, we also have to realize that there will be some whose lives will be uprooted. For these individuals there must be well-funded transition to a new, family sustaining job. To the degree that that job is not immediately available, wage subsidies must be available to keep that worker whole.

[5] https://www.bls.gov/spotlight/2022/the-construction-industry-labor-force-2003-to-2020/home.htm
[6] https://www.americanprogress.org/article/basic-facts-women-poverty/
[7] https://www.nahb.org/blog/2020/11/construction-wages-top-the-national-average/
[8] https://www.businessinsider.com/how-to-get-construction-project-done-on-time-unions-report-02022-5