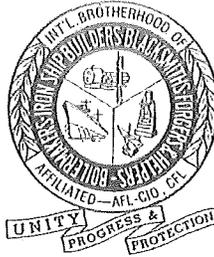


International Brotherhood of
BOILERMAKERS · IRON SHIP BUILDERS

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Local Lodge No. 647
BLACKSMITHS · FORGERS & HELPERS

Luke A. Voigt
Business Manager/Secretary Treasurer
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December 8, 2015

To Whom It May Concern:

My name is Luke Voigt and I am from Mandan, North Dakota. I am also the Business Manager of Boilermakers Local 647. The Boilermakers appreciate the opportunity to submit our comments to the North Dakota Department of Health regarding the EPA Clean Power Plan (111d).

Boilermakers Local 647's jurisdiction covers North Dakota, South Dakota, and Minnesota. We represent over 600 highly trained field construction members and have over 200 active members and countless retirees and their families living right here in the heart of the coal country of North Dakota.

We have had a longstanding relationship with each of the coal fired power plants in the state of North Dakota. Starting in the late 1950's, the Boilermakers were here to assist in building each and every coal fired plant. Over the past several decades we have helped to keep the coal fleet in this great state running to provide efficient, reliable, and affordable energy for our neighbors, friends, and families.

It appears to the Boilermakers that the Clean Power Plan will do nothing but increase the costs of electricity and its production. The end result of all this work and life changing decisions will have no measurable impacts on the global carbon footprint whatsoever. These rules are nothing more than ill-conceived politics that are based on some people in the federal government and several environmentalists' agendas. Nothing about these rules represent actual calculations, realistic time frames, or concrete facts.

With that being said, we understand that regardless of these rules possibly being illegal, the state of North Dakota must continue to push forward in compiling. We support developing a state implementation plan, but several factors need to be considered as they are essential.

First, the state needs to understand the economic impacts of these rules. The good blue collar jobs this will destroy cannot be replaced; not just for the people that work in the facilities, but everyone that lives in the areas surrounding them. The possible economic effects of any plan put forth by the state need to be studied and taken into serious consideration, as obviously, the EPA did not.

The second issue that we cannot ignore is what are all the people that work at these facilities and the coal mines supposed to do if these plants are closed? It's not like we are considering closing a widget factory, and can retrain our people to build gadgets in the new factory. There will not be anything even close to comparable in this area, even if we do build other types of electric generation; nothing out there provides the jobs that coal does. Around here, people work at the coal mine, the power plants, or in a business, industry, or craft that supports them, period.

Investments in R&D for emerging technology that reduces or captures carbon must be a large part of the SIP. Technology has come a long way recently and needs to be seriously considered as a viable option. If

we can modify our existing generation fleet or build new plants with the latest clean power technology to continue to utilize our massive coal reserves, we could be the leader of the entire country in providing clean, reliable, affordable power. This state has not built a large capacity coal fired power plant in 30-40 years and we should. The new coal fired technology is available and proven. For example, super ultra-critical boilers are proven to emit less carbon by simply being more efficient. We have also proven that coal gasification of lignite works.

In considering "remaining useful life" of our existing coal fired fleet, we need to look at each plant and decide which ones can add the latest technology to reduce carbon in the most economical way.

The Boilermakers do not fully understand the intricate details of the Clean Power Plan or the consequences of the actions that the Department of Health will be forced to take. We are working closely with our long standing partners in the utility industry (Basin, Great River Energy, MDU, and Ottertail Power) and will support them any way we can. The effects of any SIP put forth will have lasting impacts on the way we generate power in North Dakota. The people in charge of our utility companies are doing their best to work through these challenges and their input should be taken as invaluable to the Department of Health. Flexibility, reasonability, and good old fashioned North Dakota common sense needs to be the foundation of this State's SIP.

In closing, we urge the North Dakota Health Department to listen to the public comments and letters. Do the right thing, work with the utilities from our state in developing a sound cohesive SIP. Figure out a way to keep coal in the forefront of energy generation; these plants are the lifeblood of central North Dakota.

Respectfully,

A handwritten signature in black ink, appearing to read "Luke Voigt", followed by a long horizontal line extending to the right.

Luke Voigt
Business Manager/Secretary Treasurer
Boilermakers Local 647