

# Building and Construction Trades Council of Northern Nevada, AFL-CIO

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August 29, 2007

John Walker  
Executive Secretary  
Nevada State Environmental Commission  
901 South Stewart Street, Ste. 4001  
Carson City, NV 89701-5249

**RECEIVED**

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**ENVIRONMENTAL PROTECTION**

Dear Mr. Walker:

I am writing you to strongly oppose the Petition P2007-03, submitted by Western Resources Advocates.

While myself and the Construction Trades Unions my organization represents support the ultimate goal of reducing the emissions of greenhouse gasses, we do not believe the standard being proposed in this petition is the best way to accomplish this goal. We also believe the petition contradicts itself in that it speaks to the inability to turn back the clock on proposed coal fired generation plants, yet it fails to look at the overall effect of replacing older plants with newer lower emissions plants which in fact will turn back the clock on the greenhouse gas emissions levels in the state.

While the petitioners cite the Sanders-Boxer Global Warming Pollution Reduction Act (S 309) which "would establish a long-term framework to gradually reduce the nation's global warming emissions to 80 percent below the 1990 levels by 2050", this petition attacks a proposed plant which would go a long way towards such a reduction by 2013 when the Ely Energy Center would come on line and allow the decommissioning of older technology plants.

The drafters of the petition utilize the emissions data from the plant with the highest emissions level to paint all of the proposed plants. Then, claiming all coal-fire technology is the same, they ask the Commission to bury their heads in the sand and ignore the advances being made to reduce the greenhouse gas emission, instead demanding an all or nothing position be established.

While the drafters of the petition claim to support a "overall" reduction in emissions, this means to them it should be applied only to new plants emission levels rather than the overall reduction of emissions from the combination of all plants. And while they will use renewable energy to reduce the per kilowatt emission totals from their preferred fossil fuel power plant, natural gas, they do not wish to apply such a analogy to a combination of renewable and coal-fire.

The petitioners would prefer the Commission pass a regulation which would require the utilities to build natural gas power plants to meet the immediate need for power while ignoring the recent concerns that the state will be faced with natural gas shortages in the very near future even at today's consumption rates. And completely ignoring the effect of adding 2500 MW of additional gas fire plants would have on this crisis, while at the same time making our utilities even more dependent on importing fossil fuels from other countries.

While the petitioners argue less than half of the emissions from these coal plants would be due to electricity produced for consumption in Nevada, we would argue this is an argument to aim at the individual permits, not on developing a regulation. Even so they fail to clarify one of the proposed plants will produce electricity specifically for use in Nevada instead presenting only the worst of all world arguments.

Lastly the petitioner point out, "The BACT analysis under a PSD permit is 'and emissions limitation' on new major stationary sources which analyzes 'energy, environmental, and economic impacts and other costs.' See 40 CFR § 52.21(b)(12)" The petitioner then asks the Commission to ignore the need for

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immediate sources of energy to meet the growing demand throughout the state, as well as the economic impacts of meeting those needs with natural gas. They further ask the Commission to turn its back on the economic needs of White Pine County and the positive long term impact that would be created through the construction and operation of the proposed plant.

Given the afore listed arguments the Building and Construction Trades Council on Northern Nevada would like to go on record in opposition of the petition filed by Western Resources Advocates. Furthermore we would like to go on record in support of Sierra Pacific Resources proposed Ely Energy Center, and to that end have attached a Resolution of support for that project from the Nevada State AFL-CIO.

Sincerely,

A handwritten signature in cursive script, appearing to read "Todd Koch".

Todd Koch  
President, Northern Nevada Building and Construction Trades

**RESOLUTION OF THE NEVADA STATE AFL/CIO  
IN SUPPORT OF THE ELY ENERGY CENTER**

**WHEREAS** Nevada's continued growth is creating a ever increasing demand for power, and

**WHEREAS** we understand the need to reduce greenhouse gasses in a effort to reduce global warming, and

**WHEREAS** we understand if the Ely Energy Center comes on line Sierra Pacific will have the ability to shut down three of their existing power plants thereby reducing the output of greenhouse gases by as much as 50% from current levels, and

**WHEREAS** we support renewable energy but realize it will take time and investment to build an infrastructure of renewable energy power plants which will have the ability of fulfilling Nevada's ever increasing energy needs, and

**WHEREAS** we understand while geothermal is the most dependable and most prominent of the current renewable energy sources, the cost of development for a geothermal power plant is nearly \$7 million per megawatt while the planned Ely Energy Center costs are projected at approximately \$1 million per megawatt, and

**WHEREAS** ultimately the rate payers in Nevada will pay for the development of whatever source we find to feed the growing demand for electricity, and

**WHEREAS** the higher the cost to develop the energy source, the greater the financial burden on our members, and

**WHEREAS** Sierra Pacific has a record of building power plants using Union Labor, and

**WHEREAS** the Ely Energy Center will create 2500 construction jobs at its peak, and

**WHEREAS** the overwhelming majority of renewable energy projects are built with labor who do not make a living wage and do not have benefits, and

**WHEREAS** Sierra Pacific mans their power plants with Union Labor once those plants go into production, and

**WHEREAS** the Ely Energy Center will create a total of 250 permanent jobs in White Pine County once phase II has been completed, and

**WHEREAS** the overwhelming majority of renewable energy power plants are manned with a labor force who do not make a living wage and do not have benefits and are therefore a burden on their community for their health and welfare, and

**WHEREAS** Sierra Pacific is a Nevada corporation which reinvests in Nevada, and

**WHEREAS** the overwhelming majority of renewable energy developers are not Nevada corporations, in fact most of them are not even being American corporations, and they do not have a interest in reinvesting in Nevada, and

**WHEREAS** we support affordable energy, and

**WHEREAS** we support workers being paid a living wage and being provided with benefits, and

**WHEREAS** we support companies who reinvest in the state of Nevada over companies which reap profits at the expense of their workers and Nevada's rate payers only to take those profits out of the state, and

**WHEREAS** we support efforts to reduce greenhouse gases through improved technology and higher efficiency built into new power plants which will allow the decommissioning of less efficient power plants which are releasing pollutants at higher levels; be it therefore

**RESOLVED** the Nevada State AFL/CIO supports the efforts of Sierra Pacific to construct the Ely Energy Center in White Pine County, Ely, Nevada, and be it further

**RESOLVED** that this resolution shall be forwarded to those elected representatives who may have concern about this project, to show our support for the Ely Energy Center.

This resolution was approved August 22, 2007 by the delegation in attendance at the 51<sup>st</sup> Annual Constitutional Convention of the Nevada State AFL-CIO as submitted by the Building and Construction Trades Councils of Northern and Southern Nevada and the Central Labor Councils of Northern and Northeastern Nevada.