

February 14, 2022

**VIA ELECTRONIC MAIL**

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**RE: Comments of the Washington & Northern Idaho District Council of Laborers on  
PacifiCorp's Draft 2022 All-Source Request for Proposals, Docket UE-210979**

Dear Chairman Danner, Commissioner Balasbas, and Commissioner Rendahl,

Pursuant to the Notice of Opportunity to File Written Comments on PacifiCorp Draft Request for Proposals, please see the written comments of the Washington & Northern Idaho District Council of Laborers. Should you have any questions, do not hesitate to contact me at the information below.

Sincerely,



Stacy Martin

Business Manager Secretary-Treasurer  
Washington & Northern Idaho  
District Council of Laborers  
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**BEFORE THE STATE OF WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

In the Matter of PacifiCorp’s  
Draft 2022 All-Source Request for Proposals  
Docket UE-210979

COMMENTS OF WASHINGTON  
& NORTHERN IDAHO DISTRICT  
COUNCIL OF LABORERS

The Washington and Northern Idaho District Council of Laborers (“WNIDCL”) represents construction workers who build our state’s energy infrastructure. We are an affiliate of the Laborers International Union of North America (“LIUNA”) which represents over 500,000 workers in the United States and Canada. We thank you for the opportunity to submit comments on PacifiCorp’s 2022 All-Source Request for Proposals (“RFP”).

**Comments**

**1. PacifiCorp should make uniform minimum bidder requirements that reflect the highest contractor labor standards across its service territory.**

WNILDC believes that PacifiCorp’s current compliance driven approach of only addressing labor, equity, and just transition standards in states that mandate such action legislatively (thus the reference to projects located in those states) is a huge missed opportunity, and fails to be responsive to the needs of Washington stakeholders. Other utilities including Puget Sound Energy have voluntarily adopted stronger standards in their RFPs even when not statutorily required to do so.<sup>1</sup> Moreover, limiting high quality job standards to states with legislative mandates creates a patchwork of competing rules and bidding requirements which complicates comparisons of the net benefits and costs of projects across multiple states. It also creates an uneven playing field whereby bidders may choose to site projects in states with the lowest standards negating the community benefits envisioned by state legislators, and penalizing states with higher quality standards. Uneven labor standards further exacerbate inequities experienced by the most vulnerable populations including displaced fossil fuel workers, local construction workers, and highly impacted communities.

**Recommendations:**

- 1) Amend Appendix L, “Non-Pricing Scoring Matrix,” Section I, Appendix P, “Equity Questionnaire,” to add a point to all-sited resources which complete a survey comparable to the Washington Equity Survey;

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<sup>1</sup> Appendix A provides a sample of quality labor standards included in other utilities’ Requests for Proposals.

- 2) Amend Appendix L, Section II, to add a point to all-sited resources which agree to proforma contract terms which establish minimum Responsible Contractor Labor Standards comparable to those required in Oregon consistent with HB2021, including but not limited to: a 15% apprenticeship utilization rate, diverse recruitment and retention goals, employment of contractors with a history of compliance with federal and state wage and hour laws, payment of area wage standards and provision of healthcare and retirement benefits to construction labor on the project, and a requirement that bidders attest to these standards or else provide a copy of a project labor agreement in lieu of attestation;
- 3) Amend Appendix L, Section III, to add a point to renewable generating facilities in a community afflicted with poverty or high emission levels according to that state's department of health or department of energy in all states not just California;
- 4) Amend Appendix L, Section III, to add a point to all facilities located in a highly impacted community or in proximity to a vulnerable population comparable to definitions in Washington State;
- 5) Amend Appendix L, Section III, to add a point to all facilities which have demonstrated how it will provide non-energy benefits consistent with PacifiCorp's customer benefit indicators as provided in its Clean Energy Implementation Plan;
- 6) Amend Appendix L, Section III, to add a point to all facilities which have met Responsible Contractor Labor Standards including but not limited to apprenticeship and workforce requirements comparable to those required by HB2021 in Oregon;
- 7) For the lowest-cost bids responsive to this RFP, the Commission should require PacifiCorp provide the labor costs assumptions for those projects to confirm the low costs are not coming at the expense of lowering quality jobs standards for construction workers employed on the project.

**2. PacifiCorp should support the needs of impacted communities in its RFP by prioritizing an equitable transition for displaced construction workers reliant on fossil fuel jobs as well as giving preference to bidders who commit to using local workers.**

Many utilities have recognized and taken thoughtful action to transition their in-house workforce as they close fossil fuel-powered facilities. PacifiCorp has pledged to do the same, and has discussed transition plans for its in-house coal employees in the 2021 Integrated Resource Plan.<sup>2</sup> However, electric utilities use a hybrid employment model whereby specialized construction contractors supplement utilities' direct labor force. According to the Department of Energy, more workers are employed by construction companies than utilities on electric power projects. In fact, DOE estimates 33% of electric power workers are employed by construction companies as compared to only 21% who are directly employed by utilities.<sup>3</sup> Likewise at PacifiCorp's

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<sup>2</sup> PacifiCorp, 2021 Integrated Resource Plan, Volume I, September 1, 2021, p. 351-354, <https://www.pacificorp.com/content/dam/pcorp/documents/en/pacificorp/energy/integrated-resource-plan/2021-irp/Volume%20I%20-%209.15.2021%20Final.pdf>,

<sup>3</sup> Department of Energy, US Energy & Employment Jobs Report (USEER), 2021 National Report, p. 42, <https://www.energy.gov/us-energy-employment-jobs-report-useer>.

Colstrip, Jim Bridger, and Dave Johnston power plants, LIUNA members supplement the in-house workforce. Despite the importance of coal power to workers’ livelihoods and local communities, these workers are being left behind by PacifiCorp as it accelerates the closure of these plants to meet clean energy targets. Washington’s requirement to eliminate coal-fired resources from rates by 2025 is one reason certain PacifiCorp coal plants will be retired before their established depreciable life. And although these workers are being asked to sacrifice their careers to meet broader social and environmental goals, they are denied opportunities on the renewable power construction jobs that will replace them.

**Table 1: Employment in Electric Power Generation by Industry, US Energy & Employment Jobs Report, Department of Energy**

Industry	Employment	% Workforce
Construction	274,533	33%
Professional Services	175,964	21%
Utilities	172,232	21%
Manufacturing	102,198	12%
Wholesale Trade	71,244	9%
Other Services	37,403	4%
<b>Total</b>	<b>833,573</b>	<b>100%</b>

A review of two recent wind repowering projects by PacifiCorp in Washington State provide some insight as to their hiring practices, and the need for reform.

**Table 2: Past Hiring Practices for PacifiCorp’s Integrated Resource Plan in Washington State**

Project	Contractor Hired by PacifiCorp	Local Hire Reporting	Safety Incident on Site
Marengo I and II Repower	Wanzek	No	Yes – OSHA cited Wanzek for one “serious” violation. Wanzek is contesting the violation. <sup>4</sup>
Goodnoe Hills Repower	IEA Constructors	No	

PacifiCorp’s past selection of IEA Constructors and Wanzek for repower projects should give the Commission pause. As far as we are aware, neither company maintains relationships with local building trades unions and thus typically rely on supplementing its traveling workforce with temporary staffing agencies or a small number of local workers to staff wind and solar

<sup>4</sup> OSHA Inspection Nr. 1441160.015, see: [https://www.osha.gov/pls/imis/establishment.inspection\\_detail?id=1441160.015](https://www.osha.gov/pls/imis/establishment.inspection_detail?id=1441160.015).

projects. In addition, Wanzek and IEA Constructors use a majority out-of-state traveling workforce. The employment of a majority out-of-state workforce not only hurts local workers, but it does not yield better results for customers. In fact, on a MidAmerican Energy Company wind repower project in Iowa where Wanzek was a subcontractor for MidAmerican's contractor Siemens Gamesa, Siemens Gamesa hired additional third-party contractors to perform portions of Wanzek's work.<sup>5</sup> According to court records, Siemens Gamesa asserts it had to perform a portion of Wanzek's work "to recover the Work Schedule lost due to Wanzek's unexcused delays."<sup>6</sup> LIUNA's affiliate in Iowa reports that a contractor using union labor completed the project. In addition, in 2021, Wanzek was terminated from the Badger Hollow Solar Project Phase I in Wisconsin for "lack of performance."<sup>7</sup> Wanzek's reliance on temporary staffing agencies and its lack of skilled personnel has recently caused financial losses at parent company MasTec. MasTec, Inc., a publicly traded construction company, has increased its focus on clean energy but has not invested in creating the same quality job standards. MasTec recently disclosed in a November 4th, 2021 earnings call that its renewable energy division was struggling:

As we indicated on our last quarter's call, we anticipated some continued negative impact on third quarter clean energy adjusted EBITDA margin rate as two underperforming projects, highlighted during the prior quarter, would generate third quarter revenue with no margin. We substantially completed those projects during the third quarter, with performance largely as expected.<sup>8</sup>

Lastly, the Commission need only look to Wyoming to see firsthand the lack of consideration PacifiCorp's wind power developers pay to the needs of impacted communities. Despite the fact that Wyoming law requires developers to detail "the methods and strategies the applicant will use to maximize employment and utilization of the existing local or in-state contractors and labor force during the construction and operation of the facility,"<sup>9</sup> PacifiCorp's 2020 All-Source RFP shortlist winners have failed to maximize local employment opportunities in their petitions to the Industrial Siting Council. A workforce development plan that partners with labor organizations and targets displaced coal or construction workers as well as workers in host communities would help mitigate employment losses, maximize local economic benefits, and demonstrate PacifiCorp's commitment to an equitable transition.

A review of siting applications in Wyoming show a local employment rate as low as 10% during the construction phase of the Rock Creek Wind projects. This underscores the greater

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<sup>5</sup> Wanzek Complaint at 4, Case 6:20-cv-01273-RBD-EJK, Document 1, Filed 07/17/20.

<sup>6</sup> Defendant's Response to Plaintiff's Motion for Partial Summary Judgment on Defendant's Counterclaims at 2, Case 6:20-cv-01273-RBD-EJK, Document 50, Filed 12/06/21.

<sup>7</sup> Wisconsin Public Service Commission, Docket No. 9697-CE-100, 5-BS-228, 9696-CE-100, 9696-CE-101, 9697-CE-100, 9697-CE-101, Two Creeks & Badger Hollow I Solar Parks, Q3 2021 Progress Report, filed October 27, 2021, PSC REF#: 424006, <https://apps.psc.wi.gov/ERF/ERFview/viewdoc.aspx?docid=424006>.

<sup>8</sup> MasTec, Inc. (MTZ) CEO Jose Mas on Q3 2021 Results, Earnings Call Transcript, Nov. 05, 2021, <https://seekingalpha.com/article/4466064-mastec-inc-mtz-ceo-jose-mas-on-q3-2021-results-earnings-call-transcript>.

<sup>9</sup> Wyoming Stat § 35-12-109(a)(xviii), see: <https://law.justia.com/codes/wyoming/2011/title35/chapter12/section35-12-109/>.

employment value coal and other fossil fuel projects provide for local communities. For example, in Wyoming, half of the laborers on pipeline integrity projects for Enbridge and Phillips 66 are local workers; 90% of laborers on mine reclamation activities are local; and 100% of laborers on maintenance projects at Jim Bridger and Dave Johnston plants are local workers.

**Table 3: Local Hiring on Wyoming Wind Projects Included in 2021 IRP Preferred Portfolio<sup>10</sup>**

Project Name	Bidder / Developer	Type	Location	Resource Capacity (MW)	% Local Workers <sup>11</sup>	Wyoming Industrial Siting Council Docket No.
Cedar Springs IV	NextEra	Wind	WY	350.4	29%	18-05
Rock Creek I	Invenergy	Wind	WY	190	10%	21-07
Rock Creek II	Invenergy	Wind	WY	400	10%	21-07
Boswell Springs	Innergex	Wind	WY	320	20%	15-05
Two Rivers	Blue Earth Renewables LLC & Clearway Renew LLC	Wind	WY	280	20%	18-11

**Recommendations:**

- 1) For any projects included in Washington’s rates, the Commission should require quarterly reports of the number of local and state workers employed during the construction phase of the project;
- 2) Amend Appendix L, “Non-Pricing Scoring Matrix,” to include a scoring factor that gives preference to bidders who commit to a workforce plan that recruits fossil fuel construction workers for job opportunities on renewable power projects;

<sup>10</sup> PacifiCorp’s 2021 IRP preferred portfolio includes the 2020 All-Source Request for Proposals (RFP) final shortlist, see: <https://edocs.puc.state.or.us/efdocs/HAH/um2059hah163218.pdf>, p. 25.

<sup>11</sup> Local employment impacts were sourced from the following applications: Cedar Springs Wind Energy Project, Converse County, Wyoming, WY Industrial Development Information and Siting Act, Section 109 Permit Application, Final, February 2019, p. 21; Rock Creek Wind Energy Project, Albany and Carbon Counties, Wyoming, WY Industrial Development Information and Siting Act, Section 109 Permit Application, Final, December 2021, p. 25; Boswell Springs Wind Project, Albany County, Wyoming, WY Industrial Siting Permit, Socioeconomic Update, December 2021, p. 4; Two Rivers and Lucky Star Wind Project, Industrial Siting Council Docket DEQ/ISC 18-11, p. 69-70.

3) Amend Appendix P, “Equity Questionnaire,” to include under Facility Job Creation total employment of fossil fuel construction workers.

**3. PacifiCorp’s RFP should establish minimal contractor requirements that promote employee safety and health best practices, provide transparency around safety and health violations, and discourage the use of temporary staffing agencies and contractors with a history of serious safety and health violations.**

PacifiCorp’s RFP does not pay adequate attention to contractor safety and health best practices. Its “Contractor Safety Plan Requirements” which outlines the minimum contents and requirements of the Safety Plan to be prepared by the seller does not go far enough to protect vulnerable construction workers. Workers on renewable power projects are exposed to numerous occupational hazards such as falls, severe burns, and electrical shocks resulting in serious injuries and fatalities. Unfortunately, the industry has yet to self-correct with devastating consequences. The Commission has a role to play to minimize these harms and promote best practices to ensure worker safety and health.

Washington State renewable power projects have not been immune from tragedy. In fact, in July of 2020, the Department of Labor and Industries (“L&I”) found numerous safety violations in connection with the construction of the Skookumchuck Wind Farm developed by RES Americas for Puget Sound Energy’s Green Direct Program. L&I cited RES System 3 LLC for eight violations (three willful, three serious, and two general) totaling \$360,874 in fines, and RES America Construction Inc., the general contractor on the project, for six violations (two willful, two serious, and two general) totaling \$184,800 in fines related to the fatal incident at the wind farm construction site that killed 24-year-old Jonathan Stringer in January 2020, and caused serious injuries to another worker. According to the L&I investigation:

At the time of the incident, a RES System 3 employee was in a 15-foot-deep trench to position a bore pipe so it could be placed underneath a culvert by an excavator. Moments after the employee entered the trench, part of it collapsed, pinning the man. After another worker and the excavator operator jumped in to rescue him, a second larger collapse trapped the rescuers as well. The excavator operator was buried up to his knees, but was able to free himself and call for help. Managers and employees from RES America and RES System 3, as well as GEMS medics arrived to assist in the rescue effort. At one point, nine or more people took turns entering the still unprotected trench to dig out the buried workers. The crew found the worker who jumped in after the first collapse, but he was pronounced dead by the on-scene medic. A short time later, the victim buried in the first collapse was freed and taken by helicopter to Harborview Medical Center in Seattle with serious injuries.<sup>12</sup>

The violations included not having cave-in protection, having no competent person trained on trench safety, and having no written safety program specific to the project. L&I also found that RES System 3 acted indifferently to the site hazards, and provided inadequate direction to a crew

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<sup>12</sup> Washington State Department of Labor & Industries, “Three companies fined for fatal trench collapse at Rainier wind farm,” July 16, 2020, <https://lni.wa.gov/news-events/article/?id=20-024>.

doing inherently dangerous work.<sup>13</sup> The deceased worker was employed by a temporary staffing agency, Aerotek, a sub-contractor of RES America. Stringer’s family settled a wrongful death claim for \$12 million in 2021.<sup>14</sup>

Workers employed by TrueBlue/People Ready, Inc., another staffing agency, for RES Americas, Inc., filed suit against the companies in December 2020 for injuries sustained on a solar installation project in Damon, Texas. The complaint alleges one of the worker/plaintiffs suffered a ruptured inguinal column as well as a herniated bladder when he manually lifted a motor mount and torque tube assembly weighing in excess of 340 pounds. The workers/plaintiffs also allege they were not given adequate safety and or protective equipment, and that no corrective action was taken by TrueBlue or RES when the worker attempted to point out their concerns.<sup>15</sup>

Indeed, independent analysis by ProPublica found that workers employed by temporary staffing agencies face a significantly greater risk of getting injured on the job compared to permanent employees.<sup>16</sup> In fact, in response to a Washington State Department of Labor & Industries Safety and Health Assessment and Research for Prevention (SHARP) program 2017 study that found temporary employees were about twice as likely as permanent employee to be injured on the job,<sup>17</sup> the state legislature passed Substitute House Bill (SHB) 1206 in 2021 creating new requirements for staffing agencies and their employers to provide training on workplace safety and health standards.<sup>18</sup>

### **Recommendations:**

- 1) Amend Appendix L, “Non-Pricing Scoring Matrix,” to include a scoring factor that gives preference to bidders who commit to a construction workforce plan that excludes the use of temporary staffing agencies as subcontractors;
- 2) Amend Appendix L, Section III, to include a scoring factor whereby the seller agrees to a proforma contract term which prohibits the use of general contractors who have been found in violation of serious safety violations within the past three years on similar projects;
- 3) The Commission should require PacifiCorp include in the RFP an element that recognizes contractors who enroll their employees in: OSHA 10 training program, joint

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<sup>13</sup> Ibid.

<sup>14</sup> Eric Rosane, “Family of Chehalis man killed at wind farm site settles wrongful death claim for \$12 million,” *The Chronicle*, March 26, 2021, <https://www.chronline.com/stories/family-of-chehalis-man-killed-at-wind-farm-site-settles-wrongful-death-claim-for-12-million,261987>.

<sup>15</sup> In the 329<sup>th</sup> Judicial District Court of Wharton County, Texas, Charles Otis Herring, Pamela Herring, Plaintiff, vs. TrueBlue People Ready Inc., and Renewable Energy Systems Americas, Inc., Defendants, Plaintiff’s Original Petition, Filed December 22, 2020.

<sup>16</sup> Michael Grabell, Jeff Larson, and Olga Pierce, “Temporary Work, Lasting Harm,” *propublica.org*, December 18, 2013, <https://www.propublica.org/article/temporary-work-lasting-harm>.

<sup>17</sup> Washington State Department of Labor & Industries, Safety and Health Assessment and Research for Prevention (SHARP) Research Findings, Temporary Workers at Risk, [https://lni.wa.gov/safety-health/safety-research/files/2017/75\\_27\\_2017\\_Foley\\_TempsWorkers.pdf](https://lni.wa.gov/safety-health/safety-research/files/2017/75_27_2017_Foley_TempsWorkers.pdf).

<sup>18</sup> HB 1206 - 2021-22, Protecting temporary workers, [https://app.leg.wa.gov/billssummary?BillNumber=1206&Initiative=False&Year=2021&utm\\_medium=email&utm\\_source=govdelivery](https://app.leg.wa.gov/billssummary?BillNumber=1206&Initiative=False&Year=2021&utm_medium=email&utm_source=govdelivery).



labor/management safety committees, joint labor/management apprenticeship programs, and other courses identified as essential to the safe and efficient installation of wind and solar power structures;

- 4) The Commission should require PacifiCorp file Health, Safety or Environmental Incident Notices of any observed Health, Safety or Environmental infractions by construction contractors on winning bids of this RFP.

*Appendix: 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 Washington Department of Labor and Industries under the standards of the Washington State Clean Energy Transformation Act (RCW 19.405).	2021 All Source RFP <sup>i</sup>
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>ii</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	Fall 2020 Renewable Energy Bid Protocol <sup>iii</sup>

Utility or IPP	Labor Language	Power Source
	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.	
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>iv</sup>
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 MW <sup>ac</sup> of Solar and or Wind Energy Resources <sup>v</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>vi</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>vii</sup>

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- <sup>i</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>ii</sup> Northern States Power Company-Minnesota, “2021 Sherco Solar Resource Solicitation Request for Proposals,” January 4, 2021, <https://www.xcelenergy.com/staticfiles/xcel-responsive/Company/Rates%20&%20Regulations/Regulatory%20Filings/Sherco-Solar-RFP-Document.pdf>.
- <sup>iii</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>iv</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, [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).
- <sup>v</sup> 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\\_APCO\\_PSA\\_RFP\\_02152021\\_2.0.pdf](https://www.appalachianpower.com/lib/docs/business/b2b/rfp/APCO/2021WindSolar/2021_APCO_PSA_RFP_02152021_2.0.pdf).
- <sup>vi</sup> 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.
- <sup>vii</sup> 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.nyserdanyc.gov/servlet/servlet.FileDownload?file=00Pt000000RfWV4EAN>.