BLUEGREEN ALLIANCE

CREATING GOOD JOBS, A CLEAN ENVIRONMENT, AND A FAIR AND THRIVING ECONOMY

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Docket No. 2023-1032. Response to Request for Information: National Interest Electric Transmission Corridors (NIETC) Designation

On behalf of the BlueGreen Alliance (BGA), a coalition of labor unions and environmental organizations, collectively representing millions of members and supporters, we thank the President, the Department of Energy (DOE) and the Grid Deployment Office (GDO) for prioritizing the designation of route-specific National Interest Electric Transmission Corridors (NIETCs). To achieve our collective goal of achieving net zero GHG emissions economy-wide by 2050, clean energy and transmission deployment must grow rapidly. The U.S. will have to rapidly expand its existing energy infrastructure, with many studies suggesting that we need to increase renewable energy deployment at least 2-3 times from current levels. A draft of the Department of Energy (DOE) National Transmission Needs Study recently found that the United States needs an additional 47,300 gigawatt-miles of power lines by 2035, a 57% expansion of the current grid. In particular, our grid needs high-capacity, long-distance transmission that can transport electricity from remote parts of the country to denser, more urban areas. To achieve this, the rate of transmission expansion will also need to increase 2-3 times. Corridors of National Interest will help strengthen and expand transmission infrastructure necessary to reduce carbon emissions, increase clean energy, and create and maintain high-quality union jobs across the country. Transmission deployment and grid expansion critically need the direction and certainty that these designations will create.

Federal efforts to expand or upgrade new transmission lines should continue to reinforce high-road, family sustaining jobs as well as benefits for host communities. DOE can do this by strategically prioritizing projects utilizing high-road labor standards and that support and create good union jobs. Additionally, DOE should strongly consider future resource needs and deployment of clean energy in designating NIETC corridors. Currently, there are 930 gigawatts of renewable generation in the queue[i], waiting to be connected to the power grid. These projects can deliver clean, reliable power across the country but are delayed by lengthy transmission deployment times and a disorganized approach to transmission planning, siting, and permitting, in addition to burdensome interconnection queue processes. Designations made under NIETC that accommodate for planned and future clean energy resources can help accelerate siting and permitting times associated with transmission construction.

The investments made in the Inflation Reduction Act and the Bipartisan Infrastructure Law are already rapidly transforming the electric sector. Clean energy investments and the associated transmission have the potential to deliver millions of high-quality jobs,[ii] drastically reduce emissions, and create a more equitable economy. Ensuring that NIETC designations support these three goals is imperative to the success of this proposal.

To that end, our comments make recommendations for what DOE should require of applicants as well as how DOE should evaluate and prioritize NIETC designation applications, specifically responding to Section III, Required Application Information, Question IX in DOE's Request for Information.

Community Benefit Plan

In its draft Notice of Information, DOE states that it expects to require applicants to submit "a discussion of the impact that potential transmission project(s) within the proposed NIETC would have on encouraging (1) collective bargaining and free and fair opportunities for workers to organize, (2) expanding quality job opportunities and training, (3) advancing diversity, equity, inclusion, and accessibility (DEIA), (4) achieving the DOE Justice40 Initiative policy priorities,[30] (5) maximizing the use of products and materials made in the United States, and (6) maintaining or improving energy security."

We recommend that DOE require applicants to submit a Community Benefit Plan (CBP), such as those required by other programs within DOE like the DOE Regional Clean Hydrogen Hub FOA. The CBP provides a baseline for how agencies can implement labor standards and community benefits in other BIL and Inflation Reduction Act programs. A CBP is a comprehensive strategy outlining actions for community and labor engagement, workforce development, diversity, equity, inclusion, and any other identified community needs. Applicants should be incentivized to translate these CBPs into legally enforceable CBAs.[iii]

Through the CBP, applicants should be required to demonstrate successful community consultation through letters of support from community organizations, Tribes, and unions as well as a plan to engage with and address the concerns of Tribes, organizations representing residents and businesses, labor unions and other worker organizations relevant to the project, workforce development organizations, local government, emergency responders, communities with environmental justice concerns, disadvantaged communities, and community-based organizations that support or work with disadvantaged communities. To ensure that applicants are engaging in good faith practices and to deter fraud, DOE should require a reference check as part of the review process. By checking references, DOE can verify that applicants have engaged with labor, social justice, and workforce development groups that they have named in their applications. This promotes collaboration and accountability among applicants and ensures that they are working with relevant organizations to advance equity and create high-quality jobs. Additionally, applicants should be required to submit an analysis of the community and the potential negative and positive impacts of the proposed investment including the technology-based risk as well as a project implementation strategy with concrete steps the applicant will take to maximize benefits, minimize negative impacts, and measure project impacts.

By requiring a robust CBP including the elements above, DOE will be better positioned to make decisions based on the information received from applicants. Below, we respond to a number of the questions DOE asked in the Request for Information pertaining to how DOE should evaluate the merits of applications. We illustrate the need for applications to be evaluated based on strong labor standards, community engagement, and domestic content utilization, as would be demonstrated through the CBP. These elements are necessary for the NIETC designation to not only help decarbonize our grid, but to equitably distribute the jobs and benefits that come with specifically designed infrastructure projects.

Responses to Questions
When considering the merits of corridor designation applications, how should DOE evaluate and weight the impact that a proposed corridor and any associated potential project(s) may have on:

(A) Alleviating congestion or transmission capacity constraints and/or responding to concerns identified in the Needs Study and supporting grid reliability and resilience:

DOE should support designations that upgrade or construct new interregional transmission lines as well as transmission projects that increase connectivity of renewable generation. According to the Americans for a Clean Energy Grid, the interconnection of our nation's transmission system must be increased drastically to supply a resilient, nation-wide grid.[iv] According to a 2021 Grid Strategies report, interregional transmission also provides significant cost savings.[v]

DOE should work with the Bureau of Ocean Energy Management (BOEM) and relevant balancing authorities, and regional transmission organizations to identify the transmission and grid infrastructure needed to support the Biden administration's goal of deploying 30 gigawatts of offshore wind by 2030. DOE should reference the 2021 Atlantic Offshore Wind Study[vi] and coordinate recommendations for corridor designation for offshore wind contingent on the needs study. The NREL report, scheduled for publication fall of 2023, will identify which areas need planned transmission corridors to accommodate transmission from offshore wind farms. To the extent possible, NIETC corridors should align with NREL analysis of planned offshore wind transmission. Billions of dollars of offshore wind lease sales have already taken place on both coasts and having designated corridors of national importance associated with future projects will ensure a safe and timely siting and permitting process for future power infrastructure.

DOE should ensure that new transmission projects are built with a focus on interconnection and interregional, connecting the renewable energy queue, and future needs of transmission lines. DOE should:

1. **Prioritize projects that would connect clean energy to the grid**. Currently, there are 930 gigawatts of carbon-free energy waiting to be connected to the grid. These projects need reliable connectivity and resilient infrastructure to add clean generation loads to the grid. By prioritizing these projects, the NIETC will help to unleash trillions of dollars in investment in areas that have clean energy potential, with an estimated 1.2 million potential new jobs in the clean energy and transmission sector.[vii] The interconnection queue reflects the changing resource mix in the power sector, primarily being made up of wind and solar generation. The U.S. Energy Information Administration estimates that currently 75% of new electricity generation is from renewable generation.[viii] In order to harness this clean energy and facilitate economic development opportunities in the renewable sectors, DOE should prioritize transmission that will facilitate interconnection of renewable generation projects.
2. **Prioritize high-capacity, interregional projects**. In a report outlined by the Americans for a Clean Energy Grid, there are 22 high-voltage transmission projects that are ready to commence construction. These projects would support over 600,000 direct jobs, while the renewable generation facilities connected by these lines would support an additional 640,000 jobs.[ix] By focusing on interregional connection, DOE would be supporting interconnections to ensure clean energy loads are delivered to where they are most needed, while providing thousands of high-road jobs in the process.

3. **Prioritize transmission corridors that would provide additional capacity to support additional load requirements for advanced manufacturing and clean industrial facilities**. Federal and state investments are already catalyzing growth in our domestic supply chains, and DOE should prioritize corridor designation that adds transmission capacity to regions experiencing growth in these industries.

(B) Generating host community benefits:

Host communities and communities adjacent to grid infrastructure and transmission projects will have to experience not just the construction portion, but the long-term presence of projects for years to come. DOE should mitigate the added pressure of large-scale projects by requiring strong community benefits plans that offer not only economic, but cultural benefits for these communities. DOE can do this by focusing on the following recommendations:

1. Targeting investments in disadvantaged communities with a focus on deindustrialized, impacted, and underserved communities, consistent with the administration's Justice40 Initiative.
2. Utilizing hiring and procurement policies that benefit low-income communities, people of color, and women; and requiring or incentivizing community benefit/community workforce agreements that increase economic opportunities for communities and local workers—especially for people of color and low-income communities. This can be done with a Community Benefits Agreement (CBA), which is a legally binding agreement used to ensure that community interests are taken into account in large construction projects. CBAs can be negotiated with both union and community partners. DOE should incentivize CBAs to ensure community interests are front and center for large scale construction of transmission or grid related infrastructure projects. By requiring a CBA, DOE can ensure developers are held accountable for providing benefits they promise, and that community groups have a say in the development process.
3. Ensuring investments and policies are in line with the scale of change needed to meet targets for climate action, quality job growth, and economic, racial, and environmental justice. DOE should prioritize projects that will result in the greatest net decrease in GHG emissions and the greatest benefits for impacted workers and fence-line communities.
4. Prioritizing any new construction of transmission projects and the siting process that utilizes existing rights of way, or designated low conflict energy corridors and avoid unnecessary development of previously undisturbed land. This consultation and siting process should be done in concert with state, local, and tribal governments.
5. Prioritizing projects that provide concrete benefits for local communities, such as local grid resilience projects or funding for workforce development.
6. Prioritizing projects that reduce the energy burden of low-income households. Communities facing high energy burdens should have ample opportunity to participate in the planning process for grid connection projects. DOE must prepare for the future of clean energy deployment.

(C) Encouraging strong labor standards and the growth of union jobs and expanding career-track workforce development:

Family-sustaining, union jobs must be created and retained across the energy infrastructure sector and the associated manufacturing supply chain. To do this, high-road labor and workforce development standards must be utilized, such as: high-road wages and benefits; union training programs; project labor agreements; community benefit agreements; targeted and local hire;

workers' right to organize; prohibition on spending; occupational health and safety; and avoidance of misclassification, and excess use of contracted or temporary employees.

Expanding the transmission network can also be a key strategy in mitigating the economic and workforce impacts of transitioning to a clean economy with a recognition that the best approach is one that prevents economic disruption and employment loss in the first place. Projects that increase interconnection in a region with numerous clean energy projects or in areas that historically have employment in the traditional energy sectors should prioritize retention of those jobs and employment for workers dislocated from traditional energy sectors. Selecting new construction or upgraded projects that utilize union labor (i.e. a union organization in the construction trade or maintenance of electric grid infrastructure) would create opportunities for skilled training and long-term employment to the greatest number of residents in a region.

We recommend that DOE consider the following high-road labor standards when considering the eligibility of new transmission projects under NIETC:

High-Road Wages and Benefits

Any construction funded through a BIL or IRA program should adhere to Davis Bacon prevailing wage. The Davis Bacon Act and Related Acts (DBRA) require contractors and subcontractors on federal and federally assisted construction projects to pay their workers no less than the local prevailing wages and fringe benefits for the same type of work within the geographic area.

Higher wages on a given project can attract high-road contractors employing skilled professionals who perform high quality work, helping projects meet construction milestones on time and safely, without increasing total construction costs. Higher wages can have long-term economic benefits to a community and create a longstanding professional workforce for future projects. Compliance with the Davis-Bacon Act and Related Acts, adherence to prevailing wage requirements, and supporting living wages are essential for promoting fair compensation and high-quality work in the construction industry.

Davis-Bacon rates are determined by DOL based on surveys of wages and benefits paid to workers in a local area. These rates typically include wages and fringe benefits such as health insurance, pension contributions, and other benefits that are customary for the type of work being performed. DOE should encourage applicants to consider creating quality jobs with wages that go beyond prevailing wage, such as living wage standards, and include opportunities for wage progression.

Registered Apprenticeship, Pre-Apprenticeship, and Union Affiliated Training Programs

- **Union-Affiliated Training Programs**: Industrial unions work with their employers on a variety of structures for labor-management training programs (some are registered apprenticeship programs) that provide a combination of classroom and on-the-job skills training. These programs provide workers with job training and career development opportunities to help them gain new skills and advance their careers.
- **Registered Apprenticeship**: A registered apprenticeship program is a training program that combines on-the-job training and classroom instruction. Apprenticeships are

sponsored by employers, industry groups, or labor-management training committees. Registered apprenticeship programs are overseen by the U.S. Department of Labor or a DOL-recognized State Apprenticeship Agency.

- **Pre-Apprenticeship**: A pre-apprenticeship program is a training program designed to prepare individuals for entry into an apprenticeship program.

One of the main mechanisms for building career pathways is through registered apprenticeship, pre-apprenticeship, and other union-affiliated training programs. These training programs offer wrap-around services to support trainees through the programs and help ensure that workers have a clear path towards skills advancement and career development. Federal agencies should encourage or—where statutory authority permits—require the use of these programs to promote workforce development and ensure that workers receive appropriate training and education. Requiring the use of these programs can also help to promote equity and fairness in the workplace by providing opportunities for individuals from underrepresented groups to access training and career advancement. In particular, pre-apprenticeships provide individuals with the basic skills and knowledge needed to succeed in a particular trade or occupation. These programs may include classroom instruction, hands-on training, and mentorship opportunities, and they can help individuals build relationships with potential employers and apprenticeship sponsors. Pre-apprenticeships are often targeted towards individuals who may face barriers to entry into apprenticeships and/or certain populations such as low-income workers, workers of color, women, and other disadvantaged communities. Additionally, the use of these programs can help to promote a more skilled and capable workforce, supporting the economic development and prosperity of communities across the country. It is critical, however, that *quality* pre-apprenticeship programs are used.

The U.S. Department of Labor published model funding opportunity language that includes guidance on how to define a quality pre-apprenticeship and lays out five standards. A quality pre-apprenticeship:

1. is designed in collaboration with registered apprenticeship program sponsors;
2. provides meaningful hands-on training that does not displace paid employees;
3. facilitates entry and/or articulates into a registered apprenticeship program;
4. creates sustainable partnerships that promote the use of registered apprenticeships as a preferred means for industry to develop a skilled workforce and to create career opportunities and pathways leading to registered apprenticeship enrollment and
5. provide access to appropriate supportive services (e.g., wrap-around services such as child-care and transportation).[x]

Project Labor Agreements

A Project Labor Agreement (PLA) is an instrument to predict and control project timelines and labor costs. A PLA establishes the terms and conditions of employment of workers on specific construction projects, including wages, hours, working conditions, and dispute resolution methods. These agreements can be utilized at the state and local level to ensure high-road labor standards and timely project completion. PLAs promote safe, quality, cost-effective project delivery by providing project owners with unique access to the safest, most productive, best-trained skilled craft labor available in any given market. Large construction projects, not subject to Executive Order 14063 requiring use of Project Labor Agreements (PLA) for Federal Construction Projects over $35 million, can still benefit from a PLA.[xi]

These agreements are sometimes referred to as Community Workforce Agreements (CWA) because of the benefits and opportunities these agreements provide to local communities.

Targeted Hire

DOE should require or incentivize targeted hire benchmarks to help support the hiring of workers on a project from certain communities, which could include women, people of color, veterans, the formerly incarcerated, dislocated workers, indigenous people, economically disadvantaged communities, historically marginalized populations, communities heavily impacted by climate change, pollution, energy transition, or deindustrialization, and many others. These communities may be prioritized for funding opportunities through contracting requirements, hiring requirements, or the use or establishment of pre-apprenticeship programs. Ideally, these provisions establish long-lasting pipelines for members of disadvantaged communities to access good jobs and careers in the clean economy.

Local Hire

DOE should require or incentivize local hire benchmarks to help support the hiring of workers from within the state or local community. Local hire provisions may mandate a certain percentage of local workers be used, they may offer incentives to hire local workers, or they may simply require that local employment impacts be considered alongside other benefits of projects being evaluated.

Protecting Workers' Right to Organize and Collectively Bargain

Applicants should be required to provide information on how the applicant will support and protect workers' right to form or join unions in both construction and ongoing operations. By supporting workers' rights to organize and bargain collectively, DOE can promote fair and safe working conditions, protect workers' interests, and foster a more inclusive and equitable society. This could be demonstrated by a signed Labor Peace Agreement or Memorandum of Understanding with a relevant union. [xii]

The right to organize is an important tool for promoting workers' rights, improving wages and working conditions, and ensuring greater economic and social justice. Through the collective bargaining process, workers represented by a union negotiate the terms of their employment with their employer. This includes wages, benefits, hours, health and safety requirements, dispute

resolution, advancement, and more. Research has shown that through the collective bargaining power of unions, workers are able to get consistent and better benefits across the covered workforce—such as health insurance and pensions—and are able to fight for greater enforcement of the labor protections they have a right to under the law, like safety and health regulations and overtime.[xiiixiv]

Collective Bargaining Agreements

A collective bargaining agreement is a written legal contract between an employer and a union representing the employees. The collective bargaining agreement is the result of a negotiation process between the parties regarding topics such as wages, hours, and terms and conditions of employment. Applicants should be required to describe if and whether the applicant or sub applicants have existing collective bargaining relationships. Collective bargaining is one of the most powerful tools for comprehensively and consistently raising standards for any industry, as each renegotiated collective bargaining agreement—which typically has a three to five year lifetime—usually includes gains for the workers.

Prohibition on Spending

DOE should require that award recipients or any subrecipient may not use grant funds, whether directly or indirectly, to support or oppose union organizing.

Preventing Worker Misclassification

The Fair Labor Standards Act (FLSA) provides minimum wage and overtime pay protections to nearly all workers in the U.S. Some employers incorrectly treat workers who are employees under this federal law as independent contractors. We call this "misclassification."[xv] Federal agencies can require that applicants explain how projects will properly classify employees and notify all workers of their rights, including workers treated as independent contractors. DOE should require that applicants prevent misclassification to ensure workers are guaranteed benefits and protections.

Health & Safety

Funding applicants should be requested or required to describe planned activities and policies that ensure worker engagement in the design and execution of workplace safety and health programs. These programs should include a comprehensive analysis and a management plan for all risks. They should also address how a strong safety culture will be built and maintained, how open communication about safety and lessons learned will be encouraged, how workers will be protected from harassment and discrimination, how retention rates will be measured, and how worker and workplace concerns will be addressed.

One way to help achieve this is by requiring applicants to express commitment to the Contract Work Hours and Safety Standards Act (CWHSSA) and the U.S. Occupational Safety and Health Administration (OSHA) at the time of the application, and during the use of program funds. Requiring compliance with CWHSSA ensures that workers are not exposed to unsanitary, hazardous, or dangerous working conditions on federal and federally financed construction

projects. Frequently, workers in the construction industry are subject to overtime hours and the CWHSSA offers an avenue for intervention by the workers if the contractor violates the overtime requirements.

Requiring compliance with applicable OSHA and other safety standards ensures that the safety and health of workers are prioritized. Federal and state OSHAs are responsible for setting and enforcing standards related to workplace safety and health, and for providing education, training, and assistance to employers and workers to help them comply with these standards. OSHA's standards cover a wide range of hazards and risks that can arise in the workplace. Where OSHA coverage is not applicable, the project should comply with other relevant worker safety regulations.

(D) Ensure use of domestic content in the construction of transmission projects:

Passed as part of the Infrastructure Investment and Jobs Act (IIJA) on November 15, 2021, the Build America Buy America Act (BABA) was enacted to improve and expand on the existing domestic content requirements of long-standing Buy America policies. Such laws establish preferences for American-made products and materials for infrastructure projects that receive federal aid – giving American manufacturers and workers the first opportunity to supply such projects. Successful implementation of BABA will strengthen domestic supply chains, increase domestic manufacturing, and generate good quality, family-supporting manufacturing jobs.

As required by law, the DOE should ensure use of domestic content and Buy America standards in projects designated under NIETC. Although BABA is new to many agencies, there are many successful Buy America programs in effect across the government that can serve as a model – including at the Department of Transportation, the Environmental Protection Agency, and the Department of Agriculture's Rural Utilities Service. Additionally, many contractors and private sector suppliers are familiar with these policies, can certify Buy America compliance, and have sufficient capacity to meet infrastructure demand. As such, as it relates to the waiver process, the DOE should avoid issuing waivers related to unavailability as the vast majority of component parts are able to be sourced domestically (e.g., steel and aluminum for the manufacturing of clean technologies). It is also in the public interest for the DOE to never issue general applicability waivers for BABA as general waivers send no actionable market signals and instead simply circumvent established policy and the intent behind them.

The DOE should encourage supply chain reporting and disclosure while incentivizing assembler/supplier commitments and accountability. According to a WIRES/Brattle Group report, nearly 65% of the steel associated with the towers, structures, and related components are currently sourced domestically, while 35% of the aluminum and other components for transmission wires are sourced domestically. 70% of substations, including circuit breakers and transformers are made domestically. Towers, wires, and transformers make up about 95% of the materials cost for any given project.[xvi] Buy America standards ensure that developers utilizing federal dollars are sourcing from domestic manufacturers, while reducing reliance on foreign suppliers.

As the BABA requirements associated with federal investments continue to be enacted though, not only will the positive effects to both markets and employment generated by NIETC designation be further magnified, but also the environmental benefits. BABA is an important tool

to align our procurement decisions with our environmental values and reduce the carbon footprint of our infrastructure investments because U.S. factories are among the cleanest in the world in critical manufacturing sectors, like steel. A recent Global Efficiency Intelligence report found that among the six largest steel producing nations — China, India, Japan, the United States, Russia, and South Korea — which account for 75 percent of global steel production, the United States has, by far, the lowest CO2 intensity.[xvii] Ensuring domestic manufacturing for steel and aluminum in transmission projects would support not only U.S. manufacturing job growth, but also a reduction in global industrial emissions.

Conclusion

National Interest Electric Transmission Corridors designation is an opportunity for DOE to jumpstart construction and deployment of high-capacity, interstate transmission projects. These transmission projects are desperately needed to deploy clean energy resources quickly, safely, and reliably across the country and in the process create high-quality, union jobs. Our ability to decarbonize our economy and create equitable employment opportunities across the country depends on the ability for transmission projects to be permitted and sited in a reasonably timed process. The NIETC designation provides that opportunity and we are encouraged to see what transmission capacity will be deployed as its result.

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[i] Berkeley Lab, "Queued Up: Characteristics of Power Plants Seeking Transmission Interconnection As of the End of 2021," 2022. Available online: https://emp.lbl.gov/sites/default/files/queued_up_2021_04-13-2022.pdf

[ii] Americans for a Clean Energy Grid, Why Transmission Matters, 2022. Available online: https://cleanenergygrid.org/why-transmission-matters/

[iii] Community Benefits Plans and Community Benefits Agreements should not be considered interchangeable. CBPs are typically created by developers as a way to demonstrate their commitment to community benefits, while CBAs are legally-binding agreements between developers and community groups that ensure that specific community benefits are provided. While both CBPs and CBAs can be effective ways to promote community benefits, CBAs offer several advantages over CBPs. CBAs provide a higher level of accountability and enforceability, as they are legally-binding and require developers to commit to specific benefits. CBAs also involve community groups in the negotiation process, ensuring that their voices and needs are heard and reflected in the final agreement.

[iv] Americans for a Clean Energy Grid, "Transmission Projects Ready To Go: Plugging Into America's Untapped Renewable Resources" 2021. Available online: https://cleanenergygrid.org/wpcontent/uploads/2021/09/Transmission-Projects-Ready-to-Go.pdf

[v] Grid Strategies LLC, "Transmission Makes The Power System Resilient to Extreme Weather," 2021. Available online: https://cleanenergygrid.org/wp-content/uploads/2021/09/Transmission-Projects-Ready-to-Go.pdf

[vi] https://www.nrel.gov/wind/atlantic-offshore-wind-transmission-study.html

[vii] Americans for a Clean Energy Grid, "Transmission Projects Ready To Go: Plugging Into America's Untapped Renewable Resources," 2021. Available online: https://cleanenergygrid.org/wpcontent/uploads/2021/09/Transmission-Projects-Ready-to-Go.pdf

[viii] U.S. Energy Information Administration, Today In Energy: New Electric Generating Capacity in 2020 Will Come Primarily From Wind and Solar, 2020. Available online: https://www.eia.gov/todayinenergy/detail.php?id=42495#:~:text=New%20electric%20generating%20capacity%20in%202020%20will%20come%20primarily%20from%20wind%20and%20solar&text=According%20to%20the%20U.S.%20Energy,start%20commercial%20operation%20in%202020.

[ix] Americans for a Clean Energy Grid, "Transmission Projects Ready To Go: Plugging Into America's Untapped Renewable Resources," 2021. Available online: https://cleanenergygrid.org/wpcontent/uploads/2021/09/Transmission-Projects-Ready-to-Go.pdf

[x] U.S. Department of Labor, Job Quality and Equity Notice of Funding Opportunity (NOFO) Draft Language for Federal Agencies, 2023. Available online: https://www.dol.gov/general/good-jobs/job-quality-and-equity-nofo-language

[xi] EO 14063 applies to U.S. federal construction projects with a total estimated cost of $35 million or more procured by the U.S. Army Corp of Engineers, General Services Administration, Naval Facilities Engineering Systems Command, and other federal agencies that directly procure federal construction contracts. "Agencies shall require every contractor or subcontractor engaged in construction on the project to agree, for that project, to negotiate or become a party to a project labor agreement with one or more appropriate labor organizations." (Section 3). This order ***does not*** apply to federally assisted construction contracts procured by state, local, and private stakeholders although other Biden administration policies promote the use of PLAs on certain federally assisted construction projects.

[xii] A labor peace agreement is a contract between an employer and a union in which the employer agrees to be neutral during a union organizing campaign. As part of this agreement, unions generally agree not to engage in picketing, work stoppages, or other similar activity for a period of time.

[xiii] The Economic Policy Institute has conducted extensive research on unions' impact on worker benefits. According to their research, unionized workers are more likely to have employer-provided health insurance, pensions, and other benefits than non-union workers. For example, they found that 94% of unionized workers have access to employer-provided health insurance, compared to 67% of non-union workers. They also found that unionized workers are more likely to have paid vacation and sick days, as well as better job security.

[xiv] Economic Policy Institute, "Union workers are more likely to have paid sick days and health insurance," March 12, 2020. Available online: https://www.epi.org/blog/union-workers-are-more-likely-to-have-paid-sick-days-and-health-insurance-covid-19-sheds-light-on-inequalities-among-the-poorest-and-least-empowered-workers/

[xv] U.S. Department of Labor, Get the Facts on Misclassification. Available online: https://www.dol.gov/sites/dolgov/files/WHD/legacy/files/misclassification-facts.pdf

[xvi] The Brattle Group, "The Benefits of Electric Transmission: Identifying and Analyzing the Value of Investments," 2013. Available online: https://www.brattle.com/wpcontent/uploads/2017/10/8223_the_benefits_of_electric_transmission_-_identifying_and_analyzing_the_value_of_investments_chang_pfeifenberger_hagerty_jul_2013.pdf

[xvii] BlueGreen Alliance, Four Questions: Cleaner Steel Here in the U.S., 2022. Available online: https://www.bluegreenalliance.org/resources/four-questions-cleaner-steel-here-in-the-us/ v