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"Raising standards in the construction industry."

January 3, 2024

Sent Via email: jim.zolnierek@illinois.gov
c/o Jim Zolnierek, Bureau Chief, Public Utilities
Illinois Commerce Commission

RE: Thermal Energy Network Round 3 Comments

Dear Illinois Commerce Commission,

The Indiana, Illinois, Iowa Foundation for Fair Contracting (III FFC) appreciates the opportunity to provide comments on the Illinois Commerce Commission (ICC) Staff's inquiry on approaches to promote the training and transition of utility workers to work on thermal energy networks. The III FFC is a 501(c)5 nonprofit construction industry advocacy organization guided by a joint board of trustees representing the International Union of Operating Engineers, Local 150 and its signatory contractors.

The construction of thermal energy networks aligns with the skill sets of the existing utility and building trades workforces. This alignment not only mitigates potential challenges posed by skill shortages but also holds the potential for substantial job creation and retention within thermal energy networks and across a diverse spectrum of other construction projects. Therefore, the integration of thermal energy networks into construction projects that are supported by labor qualifications and training standards, addresses immediate skill-related challenges and contributes significantly to the overall sustainability and growth of the construction industry.

Utilizing the expertise of the utility union workforce facilitates a smoother transition of workers to thermal energy networks, effectively addressing training concerns through an already-established skill set. This approach not only streamlines the transition but also enhances affordability by retaining the knowledge, experience, and expertise inherent in the existing utility union workforce.

To facilitate this transition, we advocate for prioritizing the hiring of transitioning utility workers who may face job loss due to downsizing in gas transmission and distribution systems. This approach ensures a skilled workforce ready to contribute to the development and maintenance of thermal energy networks.

Furthermore, protecting the State's proprietary interest in the efficient and reliable delivery of energy, as outlined in the Public Utilities Act, is paramount. This interest is shared by utility corporations and power suppliers, who also have a vested interest in safeguarding proprietary



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concerns in publicly funded projects. III FFC strongly advocates for the implementation of project labor agreements in publicly funded projects, providing an added layer of support to facilitate the transition of workers and uphold the State's proprietary interest in the seamless and uninterrupted delivery of energy through thermal energy networks.

These agreements encompass various essential elements, including requirements for prevailing wage rates, bona fide apprenticeship criteria, promotion of pre-apprenticeship programs, and systematic outreach efforts targeting the recruitment and assistance of individuals from underrepresented and low-income communities. The utilization of project labor agreements in construction contributes significantly to fostering a stable working environment, thereby ensuring the continual success of these pivotal projects.

Thank you for considering the III FFC's input. We look forward to the continued dialogue on this important matter.

FFC