

In the Matter of Lake Charlotte Solar, LLC's joint application for the Lake Charlotte 150-MW Solar Facility and 150-MW Lake Charlotte Battery Energy Storage System (BESS) located in Rutland Township, Martin County, Minnesota

PUC Docket Numbers: IP-7159/GS-25-206; IP-7159/ESS-25-205

Comments

International Brotherhood of Electrical Workers Local 343 ("IBEW Local 343") and LIUNA Minnesota and North Dakota ("LIUNA") appreciate the opportunity to comment on the site permit applications filed by Lake Charlotte Solar, LLC ("Geronimo Power" or "Geronimo") for construction of the 150 megawatt ("MW") solar and battery storage project in Martin County.

IBEW Local 343 and LIUNA represents roughly 15,000 skilled electricians and construction laborers, including many that live in Southwest Minnesota. Our members and their families count on affordable and reliable electricity, not only to power their homes but also to serve construction contractors for whom they work, as well as energy-intensive industries that range from mining to manufacturing to agriculture.

Lake Charlotte Solar has potential to deliver significant energy and socioeconomic benefits, including ongoing employment and career opportunities for IBEW and LIUNA members that have helped to build recent wind projects in Southwest Minnesota. We look forward to working with Geronimo to build the project and realize those benefits. We appreciate the company's commitment to prioritizing use of local labor and leveraging union partnerships to accomplish that objective.

The application indicates that Geronimo intends to build Lake Charlotte Solar under the Minnesota State Electrical Code which requires use of Minnesota licensed electricians on most of the assembly and wiring work (Initial Application 5.2.11.1 P. 81). IBEW Local 343 and LIUNA support that plan and stand ready to assist as appropriate and as permitted under Minnesota's electrical code.

Local unions affiliated with the International Brotherhood of Electrical Workers ("IBEW"), LIUNA and International Union Operating Engineers Local 49 ("Local 49) have supplied skilled labor for utility- and community-scale solar projects in Minnesota, including Sherco Solar (Xcel Energy), MP Solar (Minnesota Power), Hoot Lake Solar (Otter Tail Power), as well as Geronimo's Louise Solar project which achieved 90% utilization of local labor as noted in the Lake Charlotte Solar application.

IBEW, LIUNA and Local 49 are also working closely together to staff ongoing and upcoming utility- and non-utility-owned solar projects, including Boswell and Regal Solar (Minnesota Power), Solway Solar (Otter Tail Power), and Benton Solar (NextEra) which will also involve Iron Workers Local 512, similar to Sherco Solar. We are confident of our ability to provide the skilled workforce needed to build the project, prioritizing use of local workers whose paychecks and benefits will maximize benefits to local economies as we have done on past projects.

We note, however, that on the Elk Creek Solar project developed and permitted by Geronimo under its former name National Grid Renewables Development, the company cited challenges obtaining construction bids in an August 20, 2025 petition to the Federal Energy Regulatory Commission, and suggested in an April 28, 2025 letter to the Public Utilities Commission that the company did not intend to build Elk Creek Solar under the Minnesota State Electrical Code, but planned instead claim to pursue an exemption in state law for projects built by public utilities (IP-7009/GS-19-495).

We are not aware that Geronimo has indicated in the current record that the company plans to build Lake Charlotte Solar outside the bounds of the state electrical code. To the degree that Geronimo has any concerns over the availability of skilled labor to build the project under the code, we encourage Geronimo to work with IBEW, LIUNA and Local 49 to identify potential solutions that will help to ensure successful completion of the project.

We thank the Commission for its consideration.

Respectfully Submitted on March 13, 2026,

IBEW Local 343

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