

In the Matter of the Joint Application of Summit Lake Solar, LLC and Summit Lake Storage, LLC for a Solar Energy Generating System Site Permit and a Battery Energy Storage System Site Permit for the up to 200 MW Summit Lake Solar Facility and the up to 200 MW Battery Summit Lake Energy Storage System in Nobles County, Minnesota.

PUC Docket Numbers: IP-7153/GS-25-89 and IP-7153/ESS-25-88

OAH Docket Number: 21-2500-41031

Comments

International Brotherhood of Electrical Workers (“IBEW”) Local 426 (“Local 426”) and LIUNA Minnesota and North Dakota (“LIUNA”) appreciate the opportunity to comment on the site permit applications filed by Summit Lake Solar, LLC and Summit Lake Storage, LLC (“Geronimo Power” or “Geronimo”) for construction of a 200 megawatt (“MW”) solar and battery storage project in Nobles County.

IBEW and LIUNA represent nearly 30,000 skilled electricians, utility workers 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 the construction contractors and end users that provide work opportunities to members.

Representatives of both IBEW and LIUNA attended the April 6 public hearing for the project and heard concern expressed by many local residents over potential impacts, including to the availability of prime farmland. In our view, however, Summit Lake 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 and Eastern South Dakota. We look forward to working with Geronimo to build the project and realize those benefits. We appreciate the company’s stated commitment to prioritizing use of local labor and leveraging union partnerships to accomplish that objective.

The application indicates that Geronimo intends to build Summit Lake Solar under the Minnesota State Electrical Code, and that Minnesota licensed electricians will perform most of the work to perform most of the assembly and wiring work (Initial Application 5.2.11.1 P. 81). IBEW and LIUNA support that plan and stand ready to help ensure that the project is built safely, well and on schedule.

Local unions affiliated with 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), and 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 site permit 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. 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 that, while Geronimo has not expressed any concerns about availability of skilled labor in this proceeding, the company has done so elsewhere in the past.¹ Geronimo has nonetheless declined joint requests by IBEW and LIUNA to discuss workforce plans for the Summit Lake and Lake Charlotte Solar projects, preferring instead to leave the matter to the company's construction contractors. While the Geronimo's lack of responsiveness has been disappointing, as long as the company follows through with commitments made in this proceeding, we believe that the project can be successful and community concerns over the project can be substantially allayed. We thank Commissioners for your consideration.

Respectfully submitted on April 20, 2026,

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¹ Geronimo cited challenges obtaining construction bids in an August 20, 2025 petition to the Federal Energy Regulatory Commission (https://elibrary.ferc.gov/eLibrary/docinfo?accession_number=20250820-5199&sid=962892c7-a9d2-4b6e-949f-8317f2f20481), 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; <https://efiling.web.commerce.state.mn.us/documents/%7B40BF8196-0000-C81D-9CA5-5D9B714A4BBE%7D/download?contentSequence=0&rowIndex=2>).