

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

ALJ Report Exceptions

International Brotherhood of Electrical Workers Local 343 (“IBEW Local 343”) and LIUNA Minnesota and North Dakota (“LIUNA”) appreciate the opportunity to provide exceptions to the report filed by Administrative Law Judge Suzanne Todnem concerning the application of Geronimo Power subsidiary Lake Charlotte Solar, LLC (“Geronimo”) for construction of the 150 megawatt (“MW”) solar and battery storage project in Martin County. LIUNA and IBEW appreciate Judge Todnem’s work in this matter, and largely supports the Findings of Fact, Conclusions of Law and Recommendations contained in her report.

While we generally agree with the report, IBEW and LIUNA write to propose modest changes that will better align the report with the evidentiary record, as well as an additional permit condition designed to ensure that Geronimo follows through on commitments to build the project under the requirements of the Minnesota State Electrical Code using licensed electricians for installation of racking on panels.

In comments filed on March 13, 2026, IBEW and LIUNA supported the potential for the project to provide energy and socioeconomic benefits, but raised concerns regarding apparent discrepancies between statements in the record – contained in both the Initial Application and Environmental Assessment – indicating that the project would be built under the Minnesota State Electrical Code, and statements made by a Geronimo affiliate outside the record that raised doubts about the company’s intentions.

In Geronimo’s reply comments, rather than attempt clarify the apparent discrepancy, the company either misunderstood or ignored the unions’ comment and responded as if the question posed was whether Geronimo would work with labor unions, rather than whether the company intended to build the project as proposed in its Initial Application using licensed electricians working under the Minnesota State Electric Code. Judge Todnem’s report did not pick up on this detail, which is important to ensure full transparency for the public and stakeholders regarding the project. While we requested a meeting with Geronimo to discuss the company’s workforce plans, that request was declined.

Based on the record in this case – the only record available to members of the public – Geronimo evidently intends to follow through with construction as proposed in its initial application. But given apparent discrepancies that the company has not yet resolved, we believe that the record should fully reflect the company’s commitments regarding construction plans, and for permit conditions to ensure that the project is built as proposed. In our view, to allow Geronimo to do otherwise would amount to a bait-and-switch for community members and organizations that participated in these proceedings or might have done so had Geronimo presented a different construction plan.

Amended Findings of Fact

85. On March 13, 2026, the International Brotherhood of Electrical Workers Local 343 (IBEW Local 343) and LIUNA Minnesota and North Dakota (LIUNA) submitted a written comment ~~in support of~~ stating that the Project has potential to deliver significant energy and socioeconomic benefits, but also noting an apparent inconsistency between information provided by Applicant in the record concerning installation workforce made by a different Geronimo affiliate in other cases.⁸⁹

85A. LIUNA and IBEW Local 343 noted in their comments that the Solar Facility would be installed by licensed electricians under the requirements of the Minnesota State Electrical Code according to the Initial Application and EA, but that Geronimo affiliate Elk Creek Solar had raised concerns in other proceedings regarding the feasibility of doing so on the Elk Creek Solar Project. LIUNA and IBEW Local 343 provided examples of past utility-scale projects built successfully in Minnesota by their members along with International Union of Operating Engineers Local 49, and indicated that they would be willing to meet with Applicants to address any concerns.¹

85B. On March 25, 2026, Applicants filed reply comments that referenced the comments filed by LIUNA and IBEW Local 343 but did not respond to the concerns raised regarding the apparent inconsistency between statements made by Applicants in this record and statements made by Elk Creek Solar outside the record.²

159A Much of the workforce needed to construct a Solar Facility and BESS will be comprised of Minnesota licensed electricians who will perform assembly and wiring work under the Minnesota State Electrical Code.³

Proposed permit condition

The workforce used to construct the Solar Facility shall meet the requirements of the Minnesota State Electrical Code for the assembly and wiring of solar installations.

¹ Ibid.

² Ibid

³ Ex. Application at §5.2.11.1; Ex. PUC-EIP-5 at § 4.3.8 (EA)

We thank the Commission for its consideration.

Respectfully submitted on March 13, 2026,

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