

October 3, 2025

*Via eDockets*

The Honorable Megan McKenzie  
Court of Administrative Hearings  
600 North Robert Street  
Saint Paul, MN 55164-0620

RE: EIP Reply Comments on Proposed Findings of Fact  
Benton Solar Project  
**PUC Docket Nos. IP7115/GS-23-423, IP7115/TL-23-425, and IP7115/ESS-24-283**  
**OAH Docket No. 25-2500-40339**

Dear Judge McKenzie,

Minnesota Public Utilities Commission (Commission), Energy Infrastructure Permitting (EIP) staff offers the following comments on the proposed Findings of Fact, Conclusions of Law, and Recommendations (Findings) provided by Benton Solar, LLC (Benton Solar) for the Benton Solar Project (project).<sup>1</sup>

EIP staff has reviewed Benton Solar's proposed Findings and believes that they accurately reflect the environmental review and permitting process for the project.

EIP staff has no comment on proposed Finding 225. Proposed Finding 225 states:

Based on the evidence in the record, Benton Solar will be constructed with a significant amount of local labor, which will have direct and indirect positive economic impacts in Benton County and the region around the Project. There is sufficient evidence in the record that Benton Solar has committed to having its EPC utilize union labor, that the use of union labor will result in the use of local labor, and that the EPC has agreements with unions to staff the construction jobs for the Project.

EIP staff believes this Finding is contingent on the outcome of the contested case between Benton Solar and Laborers' International Union of North America (LIUNA). As such, EIP staff has no comment on this Finding.

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<sup>1</sup> Benton Solar, *Proposed Findings of Fact, Conclusions of Law, and Recommendations*, September 26, 2025, eDocket No. [20259-223360-04](#).

EIP Reply to Proposed Findings of Fact  
PUC Docket No. IP7115/GS-23-423, IP7115/TL-23-425, and IP7115/ESS-24-283  
OAH Docket No. 25-2500-40339

EIP staff appreciates the opportunity to comment on the proposed project.

Sincerely,

A handwritten signature in black ink, appearing to read "Logan Hicks", written in a cursive style.

Logan Hicks  
Environmental Review Manager