

**Comments from Operating Engineers Local 49 and North Central States Regional Council
of Carpenters**

January 8, 2024

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

*RE: In the Matter of Petition for Approval of Northern States Power Company, dba Xcel Energy,
for Approval of its Community Solar Garden Program (13-867)*

Dear Mr. Seuffert,

As labor unions representing workers in the construction industry and their families we respectfully submit these comments on the proposal by Xcel Energy to place all Applicable Retail Rate (ARR) Community Solar Gardens (CSGs) on the 2017 Value-of-Solar (VOS) vintage.

As the Commission is aware both unions have expressed concerns on a number of occasions about the ongoing and future costs of the community solar garden. Our members support needed utility investments and recognize that those investments have a cost that must be borne by ratepayers. However, the CSG program stands out as having a cost that continually exceeds the benefits—especially at the ARR rate. Additionally, because the benefits accrue to some Xcel ratepayers (oftentimes commercial customers) at the expense of others, the benefits and burdens are often inequitable.

At this point, we support Xcel Energy's proposed change which would amount to significant savings for Minnesota customers. We look forward to reviewing additional proposals that may come forward to help reduce the cost burden of the program.

Sincerely,

Nathan Runke, Regulatory and Political Affairs Coordinator, International Union of Operating Engineers Local 49

Richard Kolodziejski, Public Affairs Director, North Central States Regional Council of Carpenters