

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

January 29, 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 Implementation of 2023 Legislative Changes to Xcel Energy's Community  
Solar Garden Program (E002/CI-23-335)*

Dear Mr. Seuffert,

The International Union of Operating Engineers Local 49 (IUOE Local 49) and the North Central States Regional Council of Carpenters (Carpenters) submit these comments replying to Nokomis Energy's request for reconsideration.

We agree with the points laid out by the Minnesota Rural Electric Association (MREA) and Xcel Energy (Xcel) in response to the petition. The legislature clearly grandfathered in all requirements on Community Solar Garden (CSG) projects from prior Public Utility Commission (Commission) orders unless "modified, replaced, or superseded." In this case, we have a prior Commission order outlining the requirements that a CSG project be sited in Xcel's service territory. Nothing in the recently passed law creating the new CSG program explicitly modified, replaced, or superseded that order.

The Commission's order is consistent with the recently passed law and we would respectfully encourage the Commission to uphold their initial order and deny Nokomis' petition.

Sincerely,

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

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