

June 30, 2021

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building 1  
21 Seventh Place East  
St. Paul, MN 55101

**VIA ELECTRONIC FILING**

**RE: In the Matter of Anoka Municipal Utility and Connexus Energy to Update  
Electric Service Territory Records  
MPUC Docket: \_\_\_\_\_  
Our File No. 15419**

Dear Mr. Wolf:

I represent Connexus Energy (the “Cooperative”), which is authorized, on behalf of the Anoka Municipal Utility (the “Municipal”) and the Cooperative (collectively, the “Parties”) to make this filing.

Summary of the Joint Request

This filing constitutes the Parties’ joint request under Minn. Stat. § 216B.39, subd. 3, that the MPUC modify the Parties’ service territory boundaries. This joint request concerns the transfer of an area located within the city limits of Andover and within the electric service territory assigned to the Municipal (the “Affected Area”), as further described below. This designation is in error and the Parties agree the area should be properly served by the Cooperative.

Legal Authorities

By statute, “the commission may on its own or at the request of an electric utility make changes in the boundaries of the assigned service areas, but only after notice and hearing . . .” Minn. Stat. § 216B.39, subd. 3. In addition, “no electric utility shall render or extend electric service at retail within the assigned service area of another electric utility unless the electric utility consents thereto in writing . . .” Minn. Stat. § 216B.40 (2014). In the present case, the Parties seek to adjust the service territory boundaries to transfer the Affected Area to the Cooperative’s assigned service territory. The Parties request that the Commission update its official records as to electric service territory boundaries.

220 South 6th Street  
Suite 2200  
Minneapolis, MN 55402-4504

Phone: 612.339.6321  
Fax: 612.338.0535

felhaber.com

### Underlying Information

1. Exhibit A: Affected Area.

Attached as Exhibit A is a map that depicts the boundaries of the Affected Area. The Affected Area involves approximately 59 acres, in a new subdivision to be constructed, and two existing customers which are served by the Cooperative. The Parties do not have a separate legal description prepared of the Affected Area, but are willing to provide whatever information is helpful and reasonably requested by MnGeo to facilitate the adjustment in the official maps. Specifically, the Parties have a Shape or CAD file of the map attached as Exhibit A. Additionally, we are attaching as Exhibit B the 1979 boundary map depicting where the line should have been and where the parties are asking it to be adjusted to today. Attached as Exhibit C is another map from the 1970s with slightly better detail than Exhibit B. Please note Exhibit C is not signed or official, but we are providing it for the clarity of the information on the map.

### Customer Notice

The Parties engaged in technical discussions, and because there is no need to construct any electric facilities to complete this change, there will be no disruption to the two existing customers in this area which are presently served by the Cooperative. The transfer of this service territory will avoid unnecessary duplication of facilities.

### Contact Information

If there are any questions concerning this filing, you may contact the following representatives:

Anoka Municipal Utility:

Greg Geiger  
Electric Utility Director  
2015 1st Avenue  
Anoka, MN 55303  
763-576-2750  
GGeiger@ci.anoka.mn.us

Connexus Energy:

Nick Loehlein  
Vice President – Electric Operations  
14601 Ramsey Boulevard  
Ramsey, MN 55303  
763-323-2600  
nick.loehlein@connexusenergy.com

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Request

The Parties therefore petition the Commission to accept and file these documents and provide due acknowledgment thereof. The Parties further request that the Commission provide evidence of its acknowledgment of these changes of service territory boundaries, and the updating of the official service territory records.

Proposed Service List

A copy of this letter and the accompanying documents has been mailed or emailed to the persons on the enclosed proposed service list. Please contact the representatives above if you have any questions.

Very truly yours,

*/s/ Sara Gullickson McGrane*

Sara Gullickson McGrane

Enclosures  
cc (w/encl.): Proposed Service List

# EXHIBIT A

**Proposed Service Boundary Change**

**Current Service Area Boundary**

**City**

- City of Andover
- City of Anoka



**City of Anoka**

**City of Andover**

**EXHIBIT**  
**A**

# **EXHIBIT B**



# MINNESOTA public utilities commission

MINNESOTA  
DEPT. OF PUBLIC SERVICE  
ELECTRIC SERVICE AREAS

GENERAL HIGHWAY MAP

## ANOKA COUNTY MINNESOTA

PREPARED BY THE  
MINNESOTA DEPARTMENT OF TRANSPORTATION  
BUREAU OF POLICY AND PLANNING

IN COOPERATION WITH THE  
U.S. DEPARTMENT OF TRANSPORTATION  
FEDERAL HIGHWAY ADMINISTRATION

SCALE OF STATUTE MILES

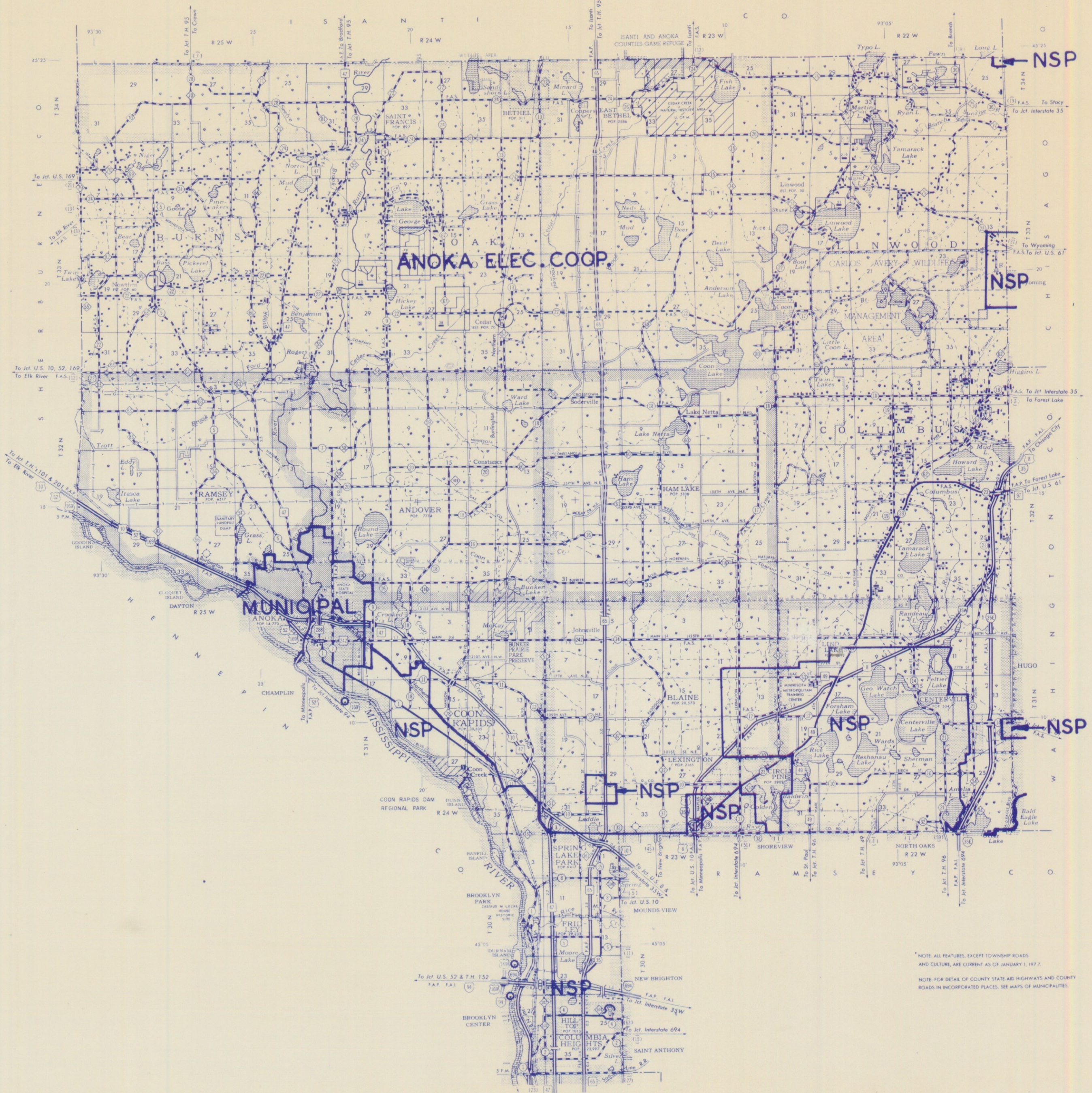
1977  
BASIC DATA 1972

Projection: Projection  
North American Datum  
of 1927

### LEGEND

- ROAD AND ROADWAY FEATURES**
  - TRAIL BRIDGE
  - BRIDGE
  - BRIDGE ON INLAND LAKES
  - BRIDGE ON LAKE LAKES
  - BRIDGE ON RIVERS
  - BRIDGE ON STRAITS
  - BRIDGE ON TOWNSHIP ROADS
  - BRIDGE ON STATE HIGHWAYS
  - BRIDGE ON FEDERAL HIGHWAYS
  - BRIDGE ON NATIONAL HIGHWAYS
  - BRIDGE ON INTERSTATE HIGHWAYS
  - BRIDGE ON AIRWAY HIGHWAYS
  - BRIDGE ON RAILROAD HIGHWAYS
  - BRIDGE ON CANAL HIGHWAYS
  - BRIDGE ON DRAINAGE HIGHWAYS
  - BRIDGE ON IRRIGATION HIGHWAYS
  - BRIDGE ON FLOOD CONTROL HIGHWAYS
  - BRIDGE ON RECREATION HIGHWAYS
  - BRIDGE ON FARM AND DWELLING UNIT HIGHWAYS
  - BRIDGE ON INDUSTRIAL HIGHWAYS
  - BRIDGE ON COMMERCIAL HIGHWAYS
  - BRIDGE ON PUBLIC SERVICE FACILITIES HIGHWAYS
  - BRIDGE ON MISCELLANEOUS MAP FEATURES HIGHWAYS
- NAVIGATION**
  - SHOALS
  - SHOALS ON INLAND LAKES
  - SHOALS ON LAKE LAKES
  - SHOALS ON RIVERS
  - SHOALS ON STRAITS
  - SHOALS ON TOWNSHIP ROADS
  - SHOALS ON STATE HIGHWAYS
  - SHOALS ON FEDERAL HIGHWAYS
  - SHOALS ON NATIONAL HIGHWAYS
  - SHOALS ON INTERSTATE HIGHWAYS
  - SHOALS ON AIRWAY HIGHWAYS
  - SHOALS ON RAILROAD HIGHWAYS
  - SHOALS ON CANAL HIGHWAYS
  - SHOALS ON DRAINAGE HIGHWAYS
  - SHOALS ON IRRIGATION HIGHWAYS
  - SHOALS ON FLOOD CONTROL HIGHWAYS
  - SHOALS ON RECREATION HIGHWAYS
  - SHOALS ON FARM AND DWELLING UNIT HIGHWAYS
  - SHOALS ON INDUSTRIAL HIGHWAYS
  - SHOALS ON COMMERCIAL HIGHWAYS
  - SHOALS ON PUBLIC SERVICE FACILITIES HIGHWAYS
  - SHOALS ON MISCELLANEOUS MAP FEATURES HIGHWAYS
- CONSERVATION**
  - FOREST RESERVE SECTION
  - FOREST RESERVE OCCUPANCY
  - FOREST RESERVE
  - FOREST RESERVE OCCUPANCY
  - FOREST RESERVE
  - FOREST RESERVE OCCUPANCY
  - FOREST RESERVE
  - FOREST RESERVE OCCUPANCY
  - FOREST RESERVE
  - FOREST RESERVE OCCUPANCY
- RECREATION**
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
  - GOVERNMENT OR COUNTY CLUB
- FARM AND DWELLING UNITS**
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
  - FARM UNIT
- INDUSTRIAL**
  - FACTORY OR INDUSTRIAL PLANT
  - FACTORY OR INDUSTRIAL PLANT
  - FACTORY OR INDUSTRIAL PLANT
  - FACTORY OR INDUSTRIAL PLANT
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  - FACTORY OR INDUSTRIAL PLANT
  - FACTORY OR INDUSTRIAL PLANT
  - FACTORY OR INDUSTRIAL PLANT
- COMMERCIAL**
  - STORE OR SMALL BUSINESS ESTABLISHMENT
  - STORE OR SMALL BUSINESS ESTABLISHMENT
  - STORE OR SMALL BUSINESS ESTABLISHMENT
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  - STORE OR SMALL BUSINESS ESTABLISHMENT
  - STORE OR SMALL BUSINESS ESTABLISHMENT
- PUBLIC SERVICE FACILITIES**
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
  - POST OFFICE
- STRUCTURES**
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
  - General Symbols (over 25' high)
- BOUNDARIES**
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
  - NATIONAL OR STATE BOUNDARY
- MISCELLANEOUS MAP FEATURES**
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH
  - CHURCH

REVISIONS	
DOCKET	DATE
USA-13, E002, E101/SA-78-703	31 AUG 78
USA-13, E101, E002/SA-78-701	31 AUG 78
USA-13 (NEW ART WORK)	5 OCT 78
USA-13, E002, E001/SA-78-867	27 OCT 78
E002, E101/SA-82-394	NA
E002, E101/SA-82-395	9 SEPT 82
E002, E101/SA-85-661	EXCEPTION
E002, E101/SA-86-649	EXCEPTION

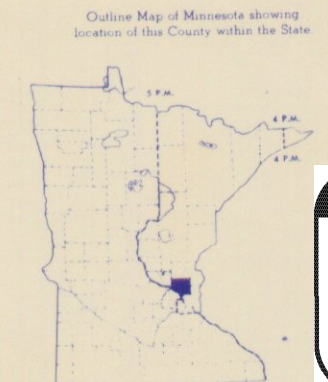


NOTE ALL FEATURES, EXCEPT TOWNSHIP ROADS,  
AND CULTURE, ARE CURRENT AS OF JANUARY 1, 1977.  
NOTE FOR DETAIL OF COUNTY STATE AND HIGHWAYS AND COUNTY  
ROADS IN INCORPORATED PLACES, SEE MAPS OF MUNICIPALITIES.

MINNEAPOLIS  
HENNEPIN CO.

I hereby certify that this utility service area map was prepared by me or under my direct supervision and that I am a duly Registered Professional Engineer under the laws of the State of Minnesota.

*John A. Anderson*  
Date: 1-2-79 Reg. No. 9602



**EXHIBIT B**

# EXHIBIT C



AEC / CITY OF ANOKA BOUNDARY LINE  
Field Checked on 9/12/74 by  
J Paulson + M Olberg (AEC) and  
Max Norris (City of Anoka Munic.)

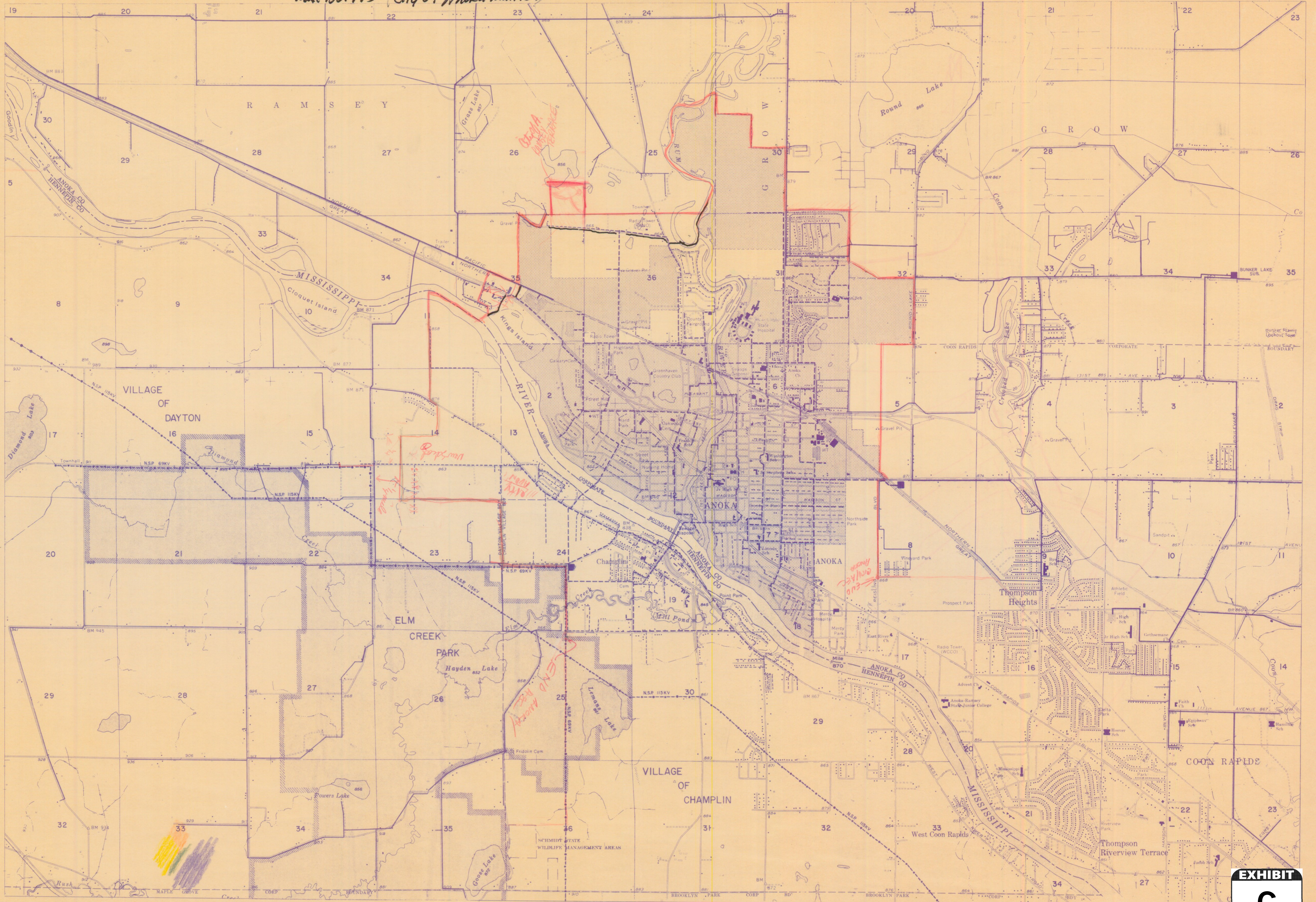


EXHIBIT  
C

**PROPOSED SERVICE LIST**

**RE: In the Matter of Anoka Municipal Utility and Connexus Energy to Update Electric Service Territory Records**

MPUC Docket: \_\_\_\_\_

Via Electronic Filing

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

Via Electronic Mail

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Vice President – Electric Operations  
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14601 Ramsey Boulevard  
Ramsey, MN 55303  
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Via Electronic Filing

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Via Electronic Mail

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Via Electronic Filing

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St. Paul, MN 55101-2134

Courtesy Copies

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smcgrane@felhaber.com  
(Connexus Energy)

Via Electronic Filing

Residential Utilities Division  
Office of the Attorney General-RUD  
1400 BRM Tower  
445 Minnesota Street  
St. Paul, MN 55101-2130