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April 19, 2017

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E143, E315/SA-17-222**

Dear Mr. Wolf:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (the Department or DOC) in the following matter:

The Joint Request of the City of Staples and Todd Wadena Electric Cooperative to
Modify Electric Service Territory Boundaries.

The petition was filed on March 21, 2017 by:

Kathleen M. Brennan
McGrann Shea Carnival Straughn & Lamb, Chtd.
800 Nicollet Mall, Suite 2600
Minneapolis, MN 55402

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve the requested service territory transfer from Todd Wadena Electric Cooperative to the City of Staples. The Commission's maps should be updated by MNGeo to reflect the service area designations as shown on the maps in the petition. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DALE V. LUSTI
Financial Analyst

DVL/lt
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE

DOCKET No. E143, E315/SA-17-222

I. SUMMARY OF PROPOSAL

On March 21, 2017, the City of Staples and Todd Wadena Electric Cooperative (TWEC), collectively the Parties, jointly filed a petition under Minn. Stat. 216B.39, subd.3, asking the Minnesota Public Utilities Commission (Commission) to modify the Parties' service territory boundaries. Approval of the Parties' request would permanently transfer the Affected Area from Todd Wadena Electric Cooperative to the City of Staples.

II. DEPARTMENT ANALYSIS

Exhibit A to the Petition is a boundary map that identifies the City of Staples Corporate Limits, the Transfer Area, an Exception Customer and Exception Meters. Exhibit B to the Petition is a legal description of the boundaries of the 17 parcels in the Transfer Areas. The Transfer Areas include approximately 352 acres.

According to the Petition, the Transfer Areas currently contain approximately 11 residential and commercial customers that are currently served by TWEC. The Parties have agreed that TWEC will continue to serve the Transfer Area on a service-by-exception basis until the Parties have arranged the transfer of electric service. Thus, no customers have changed service providers as of the date of the petition.

The Parties have agreed that the one Exception Customer as identified on Exhibit A of the petition will continue to be served by TWEC on a service-by-exception basis until December 1, 2026, unless the Parties mutually agree otherwise.

The Parties agree that the four Exception Meters as identified on Exhibit A of the petition may continue to be served by TWEC on a service-by-exception basis until the City of Staples provides ninety-days-notice of its intent to serve.

The Department notes that the Parties have agreed upon appropriate compensation.

Thus, the Department agrees that the Parties' request to establish the Affected Area as part of the City of Staples' service area is consistent with Minn. Stat. 216B.39.

III. RECOMMENDATION

The Department recommends that the Commission approve the requested service territory transfer from Todd Wadena Cooperative to the City of Staples. MNGeo should update the Commission's maps to reflect the service area designations as shown on the maps in the Petition.

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