

August 22, 2017

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources to United Natural Gas, LLC's Response to Questions Attached to the Notice of Comment Period Issued June 21, 2017**  
Docket No. G6960/M-16-214

Dear Mr. Wolf:

The Minnesota Department of Commerce, Division of Energy Resources (Department or the DOC) provides these comments in response to United Natural Gas, LLC's, (UNG or the Company) submission of July 21, 2017 regarding the Company's provision of natural gas service to the Lower Sioux Community (Lower Sioux, Community).

As discussed in the attached Comments, the Department recommends approval of UNG's request to provide service to the Lower Sioux Community government and commercial buildings with modifications. The Department is available to answer any questions that the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JK/lt  
Attachment

*These comments are being late-filed by one business day due to an inadvertent administrative omission. The Department apologizes and requests that the Commission accept these late-filed comments.*

## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. G6960/M-16-214

#### I. INTRODUCTION

On February 7, 2017, United Natural Gas (UNG, Company), which is registered in Minnesota as a limited liability company, filed a “Supplemental Document” in this docket that requested approval of a Small Gas Utility Franchise Exemption and its Final Rates/Services & Regulation Book. The filing appeared to seek to extend its regulatory exemption to allow UNG to provide natural gas local distribution service to the Lower Sioux Indian Community (Lower Sioux, Tribe or Community). On April 7, 2017, the Department of Commerce requested that the Minnesota Public Utilities Commission (Commission) require UNG to provide additional justification for this exemption request.

UNG filed its Response to the Department’s request for comments on April 17, 2017. The Company also provided correspondence from Mr. Brian Pendleton, Vice President of the Lower Sioux Community Council (Council), dated March 24, 2017. That correspondence explained the Firm Service Agreement that the Council signed with UNG on January 18, 2017. The document delineated the benefits that the provision of natural gas to the Lower Sioux Community’s government and commercial buildings is expected to provide if the Commission approves UNG’s request. It also explained that the Council plans eventually to allow UNG to provide natural gas service to members of the Tribe and to new businesses. Mr. Pendleton’s correspondence made no mention of the Tribe’s position on the extent of the Commission’s regulatory authority over such service.

On May 23, 2017, the Commission issued its Order Soliciting Comment in which it “established a comment period for interested parties on the applicability of UNG’s exemption to the service area indicated in the agreement, and related matters”.<sup>1</sup> Commission Staff issued its Notice of Comment Period on June 21, 2017 and included a number of questions in Attachment A to that document.

UNG provided its response to the Commission’s Notice of Comment on July 21, 2017, including its response to Staff’s questions.

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<sup>1</sup> Order at page 2.

## II. ANALYSIS

In its request for comments dated April 7, 2017, the Department noted the lack of legal, financial or operational information provided with UNG's request. The Department acknowledged that in the case of a municipality's request for exemption of a small gas public utility, the municipality in essence undertakes regulation of the utility's provision of natural gas service within the municipality. The Department, however, sought further explanation from UNG regarding UNG's view that the Commission has no regulatory authority over UNG regarding UNG's natural gas service to the Lower Sioux Community. The Department noted its recognition that forms of local government other than municipalities, such as tribal entities may operate under state, federal and tribal law, which may be applicable to this situation.

The Department would like to thank Commission Staff for the thoughtful questions that were included in Attachment A to the Notice for Comments. UNG's responses to those questions provide the basis for the Department's analysis.

### A. COMMISSION AUTHORITY

In its July 21, 2017, Comments, the Company largely maintained its position that the Commission does not have regulatory authority over provision of natural gas service by a public utility to the Lower Sioux, as UNG identified in its earlier Comments dated April 17, 2017 in reply to the Commission's questions. One modification to its previous position is that UNG agreed that the Commission has authority over some of the Company's potential customers.

Regarding potential customers, Question #3 asked the Company to "Provide UNG's explanation for considering the Lower Sioux load as 'incidental' to its existing small gas utility exemption." UNG responded:

UNG does not consider the expansion of service to the Community as "incidental" to its existing small gas utility exemption. The Commission has no authority to regulate UNG's provision of natural gas to the Community as the Community is a sovereign nation and Minnesota Laws concerning the regulation of public utilities do not apply to UNG's agreement to provide the Community with natural gas service. Consequently, an exemption from the requirements of Minn. Stat. § 216B with respect to the provision of natural gas service to the Community is unnecessary. UNG has requested an exemption pursuant to Minn. Stat. § 216B.16, subd. 12 to provide incidental service to the public along the route of UNG's natural gas distribution system to the Community. (Emphasis added.)

As to this “incidental” category of customers, such as those customers who would receive natural gas service from the facility built to serve the Lower Sioux, but who are located along “the route of UNG’s natural gas distribution system to the Community”<sup>2</sup>, the Company asks that the Commission exempt UNG from utility regulation regarding its provision of natural gas service to those customers. From its response, it was unclear whether the Company is asking that its service to such customers be classified as service that is incidental to its service to the municipalities of Lafayette and Courtland, for which the Commission has granted an exemption.

In its previous Comments dated April 17, 2017, while the Company recognized the existence of potential customers located outside the Lower Sioux Community, the Company asked that it “not be prohibited from providing incidental service to customers located along the route.”<sup>3</sup> UNG did not ask for Commission approval for its proposal at that time. In its most recent filing, however, UNG now makes that request.

As noted above, UNG’s position regarding its claim that the Commission lacks authority to regulate natural gas service provided to the Lower Sioux Community did not change, however. Question #4 in the Notice of Comment asked: “What State, Federal or Tribal Law is UNG relying on to conclude that service from UNG to the Lower Sioux would be exempt from Commission regulation? How does UNG’s proposal meet the relevant legal requirements of Minn. Stat. § 216B, subd. 12?” The Company provided the following:

The Community is a federally recognized Indian tribe. As a federally recognized Indian tribe, the Community is exempt from the regulation of the Commission. . . . Since the Community is a federally recognized Indian Tribe with sovereignty, it is not subject to the regulations of the Commission, specifically the regulations contained in Minnesota Statutes Chapter 216B. Because the Community is exempt from regulation, UNG, as a nonmember of the Community that provides natural gas service to the Community is not subject to regulation by the Commission with respect to providing natural gas service to the Community. UNG is seeking to provide the Community with natural gas services.

The Department appreciates UNG’s explanation of its view of Commission jurisdiction as to provision of utility service to the Lower Sioux. That said, and despite UNG’s sweeping claims, the Department does not agree that the Commission seeks to regulate the Lower Sioux. Moreover, the Department does not agree that the Commission must articulate the extent of

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<sup>2</sup> UNG Reply Comments at 3.

<sup>3</sup> UNG Reply Comments at page 2-3.

Commission authority over UNG in this matter. The record now includes the request of the Council's correspondence (a copy that correspondence is attached to these comments as Attachment A). The Department does not challenge the legitimacy of the request. Rather, as to UNG's provision of service to commercial and governmental facilities discussed in that correspondence, the Department seeks to ensure that UNG is not relieved of its obligation to provide retail customers with certain Commission-required safeguards, absent an express statement of the Lower Sioux to the contrary.

It is the Department's understanding that the Council may determine the extent and form of economic regulation of natural gas service the Council may want to require of service providers within its jurisdiction. While the Department recognizes that the Council may well be in agreement with UNG's statements, until such time that the Council itself affirms its view, including an expression of the extent to which the Council wishes to ensure that UNG provides the same protections to the Community as UNG provides to municipalities that have requested exemption for UNG from certain regulatory requirements, the Department recommends that the Commission defer addressing UNG's broader request for exemption until the Commission receives the Council's communication in this regard.

The Department believes that the Commission may wish to proceed by granting UNG's request for exemption on a limited basis while it awaits communication from the Council, under the circumstances specific to this docket.

First among those circumstances is that at present and for the foreseeable future, only the following Lower Sioux Community's facilities will receive natural gas distribution service from UNG: the Jackpot Junction Casino, Government Center, Clinic, Warehouse and Recreation Center. Commission Staff's Question #5 asked for additional information on UNG's service proposal to the Lower Sioux Community. UNG stated:

Initially, UNG has agreed to supply portions of the Community with natural gas service. These initial areas consist of Jackpot Junction Casino, the Government Center, Clinic, Warehouse and Recreation Center. . . . In the event service is expanded to include residents and small commercial customers located in the Community, it is estimated that an additional 150 to 180 customers may be provided service.

The Council appears to be functioning simply as a customer for natural gas distribution service under its current agreement with UNG. It does not appear to be exercising broader regulatory functions associated with a franchise-type agreement for natural gas local distribution service, as are for example, the municipalities of Courtland and Lafayette. This distinction is relevant

because the Department expects the Commission to be concerned that UNG continues to be subject to regulatory provisions (such as the cold weather rule and disconnection restrictions) that would protect Community members absent the Council's express intentions to the contrary if UNG initiates residential service in the Community.

Commission precedent also supports this interpretation. Commission requirements regarding the extension of consumer protections to service by UNG can be found in the Commission's May 24, 2016 Order in Docket No. G6960/M-16-214. In its that Order, the Commission clarified that while UNG had been exempted from rate regulation, it remained subject to various other statutory provisions under Commission jurisdiction:

- Annual Cold Weather Rule, Minn. Stat § 216B.096 subd. 11 and Minn. Stat. § 216B.16, subd. 12(c);
- Notice to cities of utility disconnection, in Minn. Stat § 216B.0976
- Residential customer protections, in Minn. Stat § 216B.098
- Annual tariff updates with municipally-approved rates, in Minn. Stat. § 216B.16, subd. 12(c);
- Any subsequent changes in rates, tariffs, and contracts for service outside the municipalities at least 30 days in advance of implementation; and
- Notification to the Commission should its customer base expand beyond the 2,000 customer threshold.

The consumer protections contained in the first three bullets pertain to service to residential customers under Minnesota Statutes. Given that UNG's agreement with the Council proposes at present to provide service only to commercial and governmental facilities it would appear those statutory protections are not yet applicable to this particular situation.

The Council addressed its relationship with UNG in Resolution No. 17-08 (Resolution). That Resolution notes "it is planned in the future to provide Community Members the opportunity to hook up to the natural gas pipeline for residential use."<sup>4</sup> Thus, it is the Department's understanding that no residential customers located within the Lower Sioux Community will be served by UNG as a result of this request and, thus, the question of UNG's comprehensive exemption from state regulatory requirements is not yet ripe.

This situation may change if the Council decides that it wishes its Community members (i.e., residential customers located within the Lower Sioux Community) to be served by UNG. In that instance, the Department recommends that UNG be required to seek further exemption from Commission regulation, based on the express intentions of the Community. The Commission

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<sup>4</sup> Resolution at page 2.

also may wish to request at that future time an affirmative statement from the Council as to its perspective on the demarcation of oversight responsibilities for UNG's provision of natural gas service to residential customers located within the Lower Sioux Community. It might also be beneficial to the Council to have a written understanding or agreement similar to a franchise agreement that would govern its relationship as a regulatory entity with respect to UNG on a going-forward basis.

Given the current situation, the Department concludes that it would be appropriate to allow UNG to serve the commercial and governmental facilities identified in the Resolution.

*B. INCIDENTAL SERVICE*

If the Commission grants UNG's request for exemption for the purpose of serving the facilities listed in the Resolution, several questions become relevant. One question is whether UNG's request for exemption from regulation for service to customers located along the transmission line who are located outside the Lower Sioux Community may be classified as incidental for the purposes of the Commission's review.

Similarly, Commission Staff's Question #5 asked for additional information on UNG's service proposal to the Lower Sioux Community. UNG stated:

These initial areas consist of Jackpot Junction Casino, the Government Center, Clinic, Warehouse and Recreation Center. The estimated annual therm usage for these locations is 619,750 [therms/yr]. In the future, service may be expanded to include residential and small commercial customers located in the Community. Annual therm usage for residential and small commercial is estimated to be 150,000 [therms/yr].

And, in Question #8, Commission Staff asked: "Does UNG plan to provide natural gas service to other 'incidental' load customers outside the Lower Sioux? If so, provide the customer count by customer class with associated volumes for each customer. . . ." The Company responded:

UNG does seek to provide service to approximately 15 customers that are "incidental" to the service provided to the Community. These proposed customers are located along the pipeline route to the Community. There are nine potential residential customers with an estimated annual load of 7,200 therms, four potential large commercial customers with an estimated annual load of 57,000

therms and two potential interruptible customers with an estimated annual load of 18,000 therms.

The Department created Table 1 to summarize the information included in the Company's responses.

**Table 1 – Estimated Annual Usage by Class/Contract**

Description	Annual Usage [therms/yr]	Percentage of Throughput on Transmission Line [%]
Residential	7,200	1.0
Large Commercial	57,000	8.1
Interruptible	18,000	2.6
Lower Sioux Contract	619,750	88.3
Total	701,950	100.0

As shown by Table 1, providing natural gas service to the Council's facilities is clearly the driver for the construction of this gas transmission line.

The Department calculates that the Lower Sioux load (619,750 therms/yr) would represent 30.2% of the annual throughput on the UNG's system as currently proposed. The Department also estimates that the overall percentage of load that would be classified as incidental would increase from 38.1% to 59.3%. The increase in the percentage of the number of customers provided incidental service would increase more modestly from 4.3% to 7.4%. Table 2 summarizes this information.

**Table 2 – Updated Annual Measures for Municipal and Incidental Classifications on UNG's System when the Lower Sioux Load is classified as Incidental**

Classification	Customers (%)	Peak Day Demand (%)	Annual Throughput (%)
Within Municipal Boundaries and to Council	92.6	55.7	40.7
Outside of Municipal Boundaries or along route to Lower Sioux (Incidental )	7.4	44.3	59.3
Total	100.0	100.0	100.0

Given that the Department has traditionally supported the use of the number of customers as the determining factor as to whether to approve a utility's request for exemption from Commission regulation, the information in Table 2 is not particularly concerning, as long as UNG is required to provide the same consumer protections that the Commission required in its exemption approvals for UNG service to municipalities. The Department observes that if the Council were to conclude a franchise-like agreement with UNG with the corresponding change in classification of the Lower Sioux's load from incidental to governmental/municipal (or whatever other classification would be identified), that change would lower the percentage of peak day demand and annual throughput substantially.

The Department concludes that the classification of the forecasted load associated with UNG's service to the Lower Sioux Community Council's facilities and the associated incidental load for service to customers along the route to but not located within the Lower Sioux Community is appropriate.

*C. UNG'S PROPOSED TARIFF CHANGES*

In a filing dated February 7, 2017, UNG provided proposed tariff changes to recognize the addition of the Lower Sioux Indian Community in the State of Minnesota. The Company's proposed tariff changes were confined to Section 2 of its Rate Book. The first proposed tariff change was the addition of a member of the Lower Sioux Indian Community as a board member on the Local Utilities Rate Board. The addition of the Lower Sioux Indian Community representative would increase the number of board members from five to six. The second proposed tariff change to Section 2 was the inclusion of the Lower Sioux Indian Community on the list of "Cities or Communities Involved" as defined in the Rate Book.

The Department concludes that both the proposed tariff changes are appropriate.

*D. MISCELLANEOUS*

The Department recognizes the economic benefits that the provision of natural gas may bring to the Lower Sioux Community Council facilities and, likely in the future, to the entire Lower Sioux Community. These comments are intended to acknowledge the Council's express support for UNG's exemption from Commission regulation for service to the commercial and governmental facilities identified in the Resolution while deferring consideration of comprehensive exemption of UNG from regulation by the Commission until the Lower Sioux Community Council notifies the Commission of the extent to which it supports such an exemption as previously discussed in these Response Comments.

*E. PROCEDURAL ISSUES*

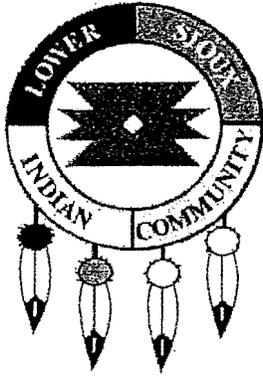
The Department recommends that the Commission include language in its Order that requires UNG to notify the Commission when:

- UNG or a related entity intends to begin to provide natural gas service to customers or facilities other than those listed in Resolution 17-08;
- UNG or a related entity executes a franchise agreement, or similar legal agreement, with the Lower Sioux Community Council or with a similar entity representing the Lower Sioux Indian Community or Council; or
- The Council notifies UNG that it intends to terminate its firm service agreement with UNG.

**III. RECOMMENDATIONS**

The Department recommends the Commission:

- Approve UNG's request to provide incidental service to the Lower Sioux Community Council and other customers located outside the boundaries of the Lower Sioux Indian Community, under the Company's exemption from the requirements of Minn. Stat. § 216B.16, subd. 12 for service provided within the borders of the municipalities of Lafayette and Courtland and for incidental service outside the borders of those municipalities as discussed in its Order dated May 24, 2016 in Docket No. G-6960/M-16-214.
- Approve UNG's proposals to increase the number of members of the Local Utilities Rate Board included in Section 2 of its tariff from 5 to 6 and to include the "Lower Sioux Indian Community" on the list of Cities or Communities in Section 2 of its Rate Book.
- Require UNG to notify the Commission if UNG or a related entity begins to provide natural gas service to customers or facilities other than those listed in the Lower Sioux Community Council's Resolution 17-08 as part of its efforts to provide natural gas service to the Lower Sioux Indian Community.
- Require UNG to notify the Commission if UNG or a related entity conclude a franchise-type agreement or other legal agreement similar in function with the Lower Sioux Community Council or a similar entity representing the Lower Sioux Indian Community.
- Require UNG to notify the Commission if the Lower Sioux Community Council initiates action to terminate its firm service agreement with UNG.



# Lower Sioux Indian Community in the State of Minnesota

P.O. Box 308 • 39527 Reservation Highway 1  
Morton, MN 56270  
*Cansayipi Onnawe*

March 24<sup>th</sup>, 2017

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

RE: Greater Minnesota Gas, Inc.'s Petition for Approval of Firm Transportation Agreement with United Natural Gas, LLC, a subsidiary of United Farmers Cooperative  
Docket No. PL6580/M-16-1026

Dear Mr. Wolf,

The Lower Sioux Indian Community in the State of Minnesota ("Community") respectfully requests that the Minnesota PUC expedite the review and approval of the Greater Minnesota Gas Inc. ("GMG") petition described above. We appreciate that the Minnesota Department Staff have reviewed the petition and recommend that the Commission approve the agreement as filed.

On January 18, 2017, we entered into a Firm Service Agreement with United Natural Gas ("UNG") to bring natural gas to the Community government and commercial buildings initially. Eventually, we plan for our Community members and new businesses to use natural gas.

Our Community businesses and government buildings have used propane for years. We have also looked at other energy options over the years. Our challenges to other energy options include our limited land base, economic resources, and that local natural gas sources are no longer available. We finally found an access opportunity working with GMG.

The Community has known for some time that it needs to diversify economically and have made attempts to do so. However, the Community is challenged to attract businesses because of the lack of natural gas as an energy option. The Community just completed a strategic plan for the Community and is beginning the process to develop an economic development strategic plan. The process and research confirm that new businesses want natural gas as their energy source. The Community Council finds this to be a great opportunity which will provide short term and long term benefits for the Community.

On behalf of our Community members, thank you for your consideration of our request to expedite the approval of the above referenced petition. It is critical to the future of our Community to have natural gas available on our lands. Please contact our President Robert Larsen, Vice President Brian Pendleton or Legal Counsel Lenor Scheffler Blaeser if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "B. Pendleton". The signature is written in a cursive style with a large initial "B" and a long, sweeping underline.

Lower Sioux Indian Community Council



# Lower Sioux Indian Community in the State of Minnesota

P.O. Box 308 • 39527 Reservation Highway 1  
Morton, MN 56270  
*Cansayapi Ojibwe*

March 24<sup>th</sup>, 2017

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

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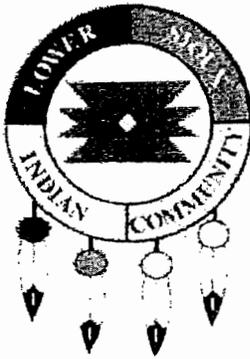
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# Lower Sioux Indian Community in the State of Minnesota

P.O. Box 308 • 39527 Reservation Highway 1  
Morton, MN 56270  
*Chaska, Dakota*

## RESOLUTION NO. 17-~~17~~

**APPROVING AGREEMENTS, GRANTING SIGNING AUTHORITY, AND  
GRANTING A LIMITED WAIVER OF SOVEREIGN IMMUNITY FOR  
THE FIRM SERVICES AGREEMENT AND MINIMUM USE AGREEMENT  
BETWEEN UNITED NATURAL GAS, A MINNESOTA CORPORATION &  
LOWER SIOUX INDIAN COMMUNITY IN THE STATE OF MINNESOTA**

- WHEREAS, the Lower Sioux Indian Community in the State of Minnesota ("Community") is a duly organized and federally-recognized Indian Tribe under 25 U.S.C. § 476, and is governed by the terms of a Constitution and By-Laws ("Constitution") originally adopted by the Tribal Members on May 16, 1936, and approved by the Secretary of the Interior on April 23, 1936; and
- WHEREAS, pursuant to said Constitution and Bylaws, the Community Council of the Lower Sioux Indian Reservation ("Community Council") is the governing body of the Community; and
- WHEREAS, the Community Council has the authority, as enumerated in the Community's Constitution at ARTICLE V - POWERS (a) to negotiate with the Federal, State, and local Governments on behalf of the Community...; (c) to approve or veto any sale, disposition, lease, or encumbrance of Community lands, interests in lands, or other Community assets...; (e) to make assignments of community land to members of the Community...; (f) to manage all economic affairs and enterprises of the Community...; (g) to appropriate for public purposes of the Lower Sioux Indian Community available funds within the exclusive control of the Community...; (i) to safeguard and promote the peace, safety, morals, and general welfare of the Community by regulating the conduct of trade and the use and disposition of property upon the reservation...; (j) to establish ordinances...providing for the maintenance of law and order upon the

BE IT FURTHER RESOLVED, the Agreements with United Natural Gas, LLC are subject to all valid laws, orders, rules and regulations of any and all duly constituted authorities having jurisdiction over the subject matter herein and is subject to the receipt of any necessary authorization for the service contemplated herein. The Agreements shall be governed by and constructed in accordance with the laws of any Court of the United States of America, with a venue in the State of Minnesota, and suit or proceeding relating to the Agreements, and to the respective courts to which an appeal of the decisions of any such court may be taken, and each party agrees not to commence, or cooperate in or encourage the commencement of, any such action, suit, or proceeding, except in a Court of the United States of America. Each party hereby irrevocably waives, to the fullest extent it may do so, the defense of an inconvenient forum for such an action, suit or proceeding. Each party waives to the extent permitted by law, their respective rights to trial by jury for any claim whatsoever in any way connected with these Agreements. The Community hereby provides a limited waiver of its sovereign immunity from an action brought by the United Natural Gas, LLC relative to disputes between the parties arising under these Agreements that the parties are unable to informally resolve. The Community's waiver of its sovereign immunity is further limited to the amounts due to United Natural Gas, LLC under these Agreements. Except as specifically provided in the Agreements, nothing in the Agreements shall be construed or interpreted to affect a waiver of Customer's sovereign immunity. Except as specifically provided in the Agreements, no waiver of Customer's sovereign immunity of from suit may be implied from any action or document.

#### CERTIFICATION

We certify that Resolution No. 17- 08 was duly adopted by the Community Council of the Lower Sioux Indian Community in the State of Minnesota at a meeting held on the 11 day of September, 2017, a quorum being present by a vote of 3 in favor, 0 opposed, and 0 abstaining.

[Signature]  
Robert L. Larsen, President

[Signature]  
Brian Pendleton, Vice President

[Signature]  
Earl Pendleton, Treasurer

[Signature]  
Gary Prescott, Secretary

[Signature]  
Justice Wabasha, Assistant Secretary Treasurer

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. G6960/M-16-214**

**Dated this 22<sup>nd</sup> day of August 2017**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_16-214_Official
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_16-214_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_16-214_Official
Gregory	Hauptert	ghauptert@parthenonagency.com	Sobalvarro & Hauptert	11 7th Ave. N., Suite 100  St. Cloud, Minnesota 56303	Electronic Service	No	OFF_SL_16-214_Official
Robert	Larsen	robert.larsen@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_16-214_Official
Douglas	Lund	doug.lund@ufcmn.com	United Natural Gas, LLC	705 E. 4th Street PO Box 461 Winthrop, MN 55396	Electronic Service	No	OFF_SL_16-214_Official
Brian	Pendleton	N/A		PO Box 308 39527 Reservatio Hwy 1 Morton, MN 56270	Paper Service	No	OFF_SL_16-214_Official
Al	Poehler	ctlclerk@comcast.net	City of Courtland	300 Railroad St  Courtland, MN 56021	Electronic Service	No	OFF_SL_16-214_Official
Darren	Saffert	lafcityclerk@gmail.com	City of Lafayette	700 Ninth St PO BOX 375 Lafayette, MN 56054	Electronic Service	No	OFF_SL_16-214_Official
Lenor	Scheffler Blaeser	Lenor.scheffler@lowersioux.com	Lower Sioux Indian Community	PO Box 308 39527 Reservation Highway 1 Morton, MN 56270	Electronic Service	No	OFF_SL_16-214_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James	Stenson		Nicollet County	501 South Minnesota Avenue  St. Peter, MN 56082	Paper Service	No	OFF_SL_16-214_Official
Teresa	Wenninger	teresa.wenninger@ufcmn.com	United Farmers Cooperative	PO Box 461  Winthrop, MN 55396	Electronic Service	No	OFF_SL_16-214_Official
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55102147	Electronic Service	Yes	OFF_SL_16-214_Official