

March 9, 2020

PUBLIC DOCUMENT

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E111/M-20-79

Dear Mr. Seuffert:

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

Dakota Electric Association's 2020 Annual Resource and Tax Adjustment.

The petition was filed on January 15, 2020 by:

Eric Fehlhaber
Director Financial Planning, Analysis and Regulatory
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024

The Department recommends **approval** and is available to respond to any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ MARK JOHNSON
Public Utilities Analyst Coordinator

MAJ/ja
Attachment



Before the Minnesota Public Utilities Commission

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

Docket No. E111/M-20-79

I. BACKGROUND

On August 28, 2019, Dakota Electric Association (Dakota or DEA) made a filing in Docket No. E999/AA-19-402 (2019 AAA) in accordance with Minnesota Rules 7825.2800-7825.2840, which requires that all public utilities make a filing by September 1 of each year to reflect changes in their annual automatic adjustment of charges (AAA) or fuel clause adjustment (FCA) riders.

On January 14, 2020, The Minnesota Department of Commerce (Department) filed a letter in Docket No. E999/AA-19-402 stating that Dakota was the only electric utility to make a filing by September 1, 2019 in Docket No. E999/AA-19-402 (Letter). The Department's Letter also stated that, given the January 1, 2020 implementation date of the new FCA reform process established in Docket No. E999/CI-03-802, the Minnesota Public Utilities Commission's (Commission) December 12, 2018 Order permitted Minnesota's other regulated electric utilities, which include Xcel Electric, Minnesota Power, and Otter Tail Power Company, to submit the previous fuel clause adjustment information (FYE19 AAA reports) by March 1, 2020, while extending the covered period to December 31, 2019. The Department stated that Dakota was not included in the FCA reform, and was thus required to make the September 1, 2019 filing for the July 2018 – June 2019 (FYE19) reporting period. In addition, the Department stated:

Since Dakota is an electric distribution-only cooperative, it was exempt from many of the compliance filings required under the old FCA process. For example, since Dakota is neither a transmission nor a generation owner, it was not required to submit any information regarding Midcontinent Independent System Operator (MISO) activities. In addition, Dakota has few choices regarding its fuel and purchased power and associated costs.

The Department notes that Dakota is already required to make a filing in January of each year detailing its purchased energy costs, which Dakota generally refers to as its Annual Resource and Tax Adjustment (RTA) filing. Moreover, Dakota's RTA filings and resulting RTA factors are reviewed by the Department each year and approved by the Commission.

As a result, the Department generally conducted a limited review of Dakota's AAA filings in past proceedings, other than including Dakota's information in the larger report that focused primarily on Minnesota's vertically integrated, investor-owned utilities.

The Department concludes that there is little to be gained from having Dakota continue to submit annual FCA costs in September AAA filings and in the annual RTA filings. Given that the RTA filings are where Dakota's fuel clause rates are set for the year, the Department recommends that the Commission require Dakota to provide its AAA filing information in its annual RTA filings.

The Department will conduct the necessary reviews of such information in conjunction with its review of Dakota's annual RTA filings. The Department notes that this approach would provide a more streamlined and efficient process for reviewing Dakota's annual purchased energy costs.

Since Dakota already provided information in Docket No. E999/AA-19-402, that information can be considered in the RTA docket once Dakota files its 2020 RTA petition.

On January 15, 2020, Dakota filed a petition in Docket No. E111/M-20-79 requesting approval of its proposed Resource and Tax Adjustment (RTA) for the year 2020 (2020 RTA).

On January 23, 2020, Dakota filed comments in Docket No. E999/AA-19-402 agreeing with the Department's recommendation to address Dakota's 2019 AAA filing in conjunction with its 2020 RTA filing.

The Department's analysis of Dakota's 2019 AAA and 2020 RTA filings is provided below.

II. DEPARTMENT ANALYSIS – DAKOTA'S 2019 AAA

A. OVERVIEW

Minnesota Rules 7825.2800 through 7825.2830 require natural gas and electric utilities implementing automatic adjustments in the recovery of fuel purchases to file annual automatic adjustment reports. To provide further context to these reports, the Department provides excerpts from the Statement of Need and Reasonableness (SONAR) that the Minnesota Public Utilities Commission (Commission) issued when it adopted these rules.

These rules were put in place in 1984 in Docket No. G,E-999/R-83-467. In its April 18, 1984 SONAR (1984 SONAR) at pages 10-11, the Commission stated the following regarding the purpose of the annual filings by the utilities:

There currently is no provision in the rules to require the [C]ommission to annually review the entire effect of automatic adjustments upon customer rates, consumption patterns, utility revenues and distribution of supplier refunds; nor is there any provision to review projected fuel and gas costs. Therefore, the intent of the proposed additions is to make information about automatic adjustment of charges available for annual review by the [C]ommission, intervenors and the public, to provide a means by which the [C]ommission may determine the appropriateness and reasonableness of the separate charge and refund transactions during a prior year.

Currently utilities submit periodic automatic adjustment reports to the Minnesota Department of Public Service (DPS) [a predecessor to the Department of Commerce]. These reports are reviewed by the DPS to determine that the rates are in compliance with [C]ommission rules and approved rates. An annual report filed directly with the Commission will enable the Commission to more effectively discharge its duties to review and monitor rates pursuant to Minn. Stat. § Ch. 216B (1982).

The materials required to be submitted will allow the Commission to make an independent, accurate evaluation of the automatic adjustment charges for each utility.

The information required by the Commission for the annual report of automatic adjustment of charges is needed to fully evaluate the impact these charges have had upon the ratepayers of each utility during the reporting period.

The Commission stated the following on page 13 regarding how the information in the reports is to be used at the Commission's annual meeting ("The commission shall annually conduct a separate meeting to review the automatic adjustment of charges reported herein"):

This addition to the rule will allow the Commission an opportunity to review and evaluate all utilities' automatic adjustments at one time, giving the Commission a broad perspective for its analysis of the application and impact of automatic adjustments. This meeting will also give the Commission an opportunity to review any cost changes in gas or electric utility fuel purchases and will allow the public and utilities to address to [sic] the appropriateness of changes in automatic adjustments during the reporting period.

As stated above, Dakota was the only Minnesota rate-regulated electric utility required to make the September 1, 2019 filing for the July 2018 – June 2019 (FYE19) reporting period in Docket No. E999/AA-19-402.

B. MINNESOTA RULES

Pursuant to Minnesota Rule 7825.2810, subpart 1, the filing requirements for electric utilities include the following:

- Paragraph A – the base cost of fuel approved by the Commission in the utility’s most recent rate case;
- Paragraph B – billing adjustment amounts charged to customers for each type of energy cost, such as nuclear, coal, or purchased power;
- Paragraph D – total cost of fuel delivered to customers;
- Paragraph E – revenues collected from customers for energy delivered; and
- Paragraph G – amount of refunds credited to customers.¹

The Department reviewed Dakota’s 2019 AAA filing, specifically Exhibits C-I and C –II, and concludes that Dakota complied with the Commission’s filing requirements as described in Minnesota Rule 7825.2810, subpart 1.

Minnesota Rule 7825.2820 requires the following:

By September 1 of each year, all gas and electric utilities shall submit to the commission an independent auditor's report evaluating accounting for automatic adjustments for the prior year commencing July 1 and ending June 30 or any other year if requested by the utility and approved by the commission.

In its 1984 SONAR, the Commission stated the following at page 12 regarding the purpose of this requirement:

This addition to existing rules is necessary and reasonable because the existing rules provide that certain accounts included in the uniform system of accounts will be used in the calculation of automatic adjustments. An independent auditor’s report will provide, in addition to the checks on the computation of automatic adjustment charges done by the DPS [a predecessor to the Department of Commerce] and the Commission, a further check that the charges and credits used in the computation are in compliance with the uniform system of accounts as required by these rules.

¹ Paragraphs C and F pertain to natural gas utilities.

The Department notes that Dakota provided a copy of its independent auditors report in Exhibit C of its 2019 AAA filing. As a result, the Department concludes that Dakota complied with Minnesota Rule 7825.2820.

Minnesota Rule 7825.2830 requires all electric utilities to “submit to the commission a five-year projection of fuel costs by energy source by month for the first two years and on an annual basis thereafter.” Dakota’s five-year projects of fuel costs by energy source by month is provided in Exhibit D of its 2019 AAA filing. As a result, the Department concludes that Dakota complied with Minnesota Rule 7825.2830.

Minnesota Rule 7825.2840 requires all electric utilities to “provide notice of the availability of the reports defined in parts [7825.2800](#) to [7825.2830](#) to all interveners in the previous two general rate cases.” Dakota complied with this requirement in Exhibit E of its 2019 AAA filing.

The Department discusses Dakota’s FYE19 fuel costs and five-year fuel cost projections in the following two sections.

C. FYE19 TOTAL POWER COST REVIEW

Dakota serves about 105,000 Minnesota electric customers in the southern metropolitan area, in Dakota, Goodhue, Scott and Rice counties.

Dakota does not own generation and transmission resources, and instead purchases its power from Great River Energy, its wholesale generation and transmission provider.

Dakota’s 2019 AAA filing includes \$146,451,169² or \$80.26/MWh³ on average in power costs for FYE19, which includes generation capacity and transmission costs from its supplier during the reporting period.⁴ This amount is approximately 2.26 percent⁵ lower than the \$82.12/MWh⁶ cost in FYE18.

DEA recovered \$146,958,418 in fuel costs and thus over-recovered fuel costs in FYE19 by \$507,249 or 0.35 percent.⁷

Regulated utilities normally recover through their automatic adjustments only changes from the amounts set in a rate case for costs of fuel and cost of energy obtained through purchased power agreements (PPAs); changes in capacity costs are typically not reflected in fuel adjustment clauses. As

² Dakota’s 2019 AAA filing, Exhibit C-II, Page 1 of 19.

³ Id.; \$146,451,169/1,824,628,676 kWh x 1,000 = \$80.26/MWh.

⁴ Subject to Commission approval, Minnesota Rule 7825.2600 allows a utility that purchases at least 75 percent of its annual energy requirements to include capacity costs in its energy adjustment. Dakota does not have its own generation. Dakota purchased all its FYE19 energy needs from power supplier Great River Energy (GRE).

⁵ Calculated; $(\$82.12 - \$80.26) / \$82.12 = 2.26\%$

⁶ Department’s April 26, 2019 Comments in Docket No. E999/AA-18-373, Attachment D4.

⁷ Dakota’s 2019 AAA filing, Exhibit C-II, Page 1 of 19.

an electric cooperative providing only distribution service, however, Dakota requires special consideration because it recovers variations in purchased capacity costs as well as energy costs through the fuel adjustment clause. Ordinarily, the inclusion of these costs makes Dakota’s monthly over- and under-recoveries potentially greater than those experienced by utilities that only include fuel and PPA costs in their fuel clause. Changes in sales can result in a significant gap between the utility’s actual purchased capacity costs per kWh and the purchased capacity costs per kWh built into its base rates. To account for potential discrepancies between its actual and recovered costs through its automatic adjustment, Dakota calculates and applies an annual fuel-cost true-up factor based on these discrepancies.

The Department reviewed Dakota’s FYE19 power costs and concludes that they appear reasonable.

D. SUMMARY OF FUEL COST PROJECTIONS

Minnesota Rule 7825.2830 requires all electric utilities to “submit to the commission a five-year projection of fuel costs by energy source by month for the first two years and on an annual basis thereafter.” In its 1984 SONAR, the Commission stated the following at page 12 regarding the purpose of this requirement:

The overall purpose of a five-year projection of fuel and gas costs is to aid the Commission in anticipating potential rate impacts upon Minnesota ratepayers. These projections will provide the Commission with a state-wide perspective on future energy requirements and costs which may affect customer consumption, the level of rates, facility expansion requirements, and rate design proposals.

Dakota’s energy cost projections are summarized in Tables 1 and 2 below:

Table 1: Dakota’s Forecast of Annual Energy Costs⁸

(\$/MWh)	2020	2021	2022	2023	2024
Dakota (FYE)	[TRADE SECRET DATA HAS BEEN EXCISED]				

Table 2: Dakota’s Annual Percentage Change in Forecasted Energy Costs⁹

	2020	2021	2022	2023	2024
	\$/MWh				
Dakota (FYE)	[TRADE SECRET DATA HAS BEEN EXCISED]				

⁸ Per Dakota’s 2019 AAA filing, Exhibit D, Page 2 of 2.

⁹ Annual percentage changes calculated by the Department.

The Department reviewed Dakota's projected five-year energy costs and concludes that they appear reasonable and consistent with projections provided in previous AAA filings.

E. DEPARTMENT'S OVERALL RECOMMENDATION

Based on the above, the Department recommends that the Commission accept Dakota's FYE19 AAA filing.

III. DEPARTMENT ANALYSIS – DAKOTA'S 2020 RTA

A. OVERVIEW

The RTA is a long-standing per-kilowatt-hour (per-kWh) surcharge (or credit) that recovers or refunds incremental changes in three types of costs: purchased power costs, conservation costs, and property taxes. The tariff language applying the RTA is as follows:

The Energy Charge shall be adjusted for incremental changes in purchased power costs, incremental changes in Dakota Electric's conservation tracker account balance, and incremental changes in real and personal property taxes above or below the appropriate base costs. The conservation tracker account factor shall be calculated as described in the Resource Adjustment Rider (Sheet 51). The real and personal property tax factor shall be calculated as described in the Property Tax Adjustment Rider (Sheet 53). The purchased power cost factor shall be adjusted by \$0.0001 per kilowatt-hour or major fraction thereof, of which the Association's total projected power cost per kilowatt-hour annually exceeds, or is less than \$[0.XXXXX¹⁰] per kilowatt-hour sold. The year used for the annualized RTA will be January 1 through December 31. The projection shall be reviewed after six months (July) and adjusted if necessary. The RTA shall be filed with the Public Utilities Commission each year before implementation.

Pursuant to the requirements in Dakota's tariff, Dakota has filed an RTA petition each year starting in 1997.¹¹ Dakota's proposed adjustments for the current year are as shown in Table 3 below.

¹⁰ This value may be \$0.0200, \$0.0305, \$0.0497, \$0.0775, or \$0.0903 dependent upon rate code.

¹¹ See docket numbers E111/M-97-722, 98-644, 99-695, 00-35, 01-72, 02-47, 03-47, 04-101, 05-110, 06-59, 07-44, 08-41, 09-32, 10-36, 11-48, 12-610, 13-37, 14-46, 15-40, 16-42, 17-33, 18-44, and 19-36. Each year, the Department has reviewed Dakota's filing and the Commission has approved the RTA as filed.

Table 3: Dakota’s Proposed 2020 RTA Adjustments (\$/kWh)¹²

	Schedule¹³	Purchased Power	DSM & Conservation	Property Tax Total	
31	Residential	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
32	Res’l Dem. Control	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
36	Irrigation—Frim	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
37	Irrigation--Interruptible	(\$0.0015)	\$0.0002	(\$0.0001)	(\$0.0014)
41	Sm Gen’l Serv.	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
44	Street Lights	\$0.0035	\$0.0002	(\$0.0002)	\$0.0035
46	General Service	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
49	Geothermal Heat Pump	\$0.0008	\$0.0002	(\$0.0001)	\$0.0009
51	Controlled Energy Storage	\$0.0030	\$0.0002	(\$0.0001)	\$0.0031
52	Controlled Interruptible	\$0.0062	\$0.0002	(\$0.0001)	\$0.0063
53	Time of Day - Res'l	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
54	Time of Day – Gen’l Service	\$0.0035	\$0.0002	(\$0.0001)	\$0.0036
70	Interruptible Option - Full	(\$0.0015)	\$0.0002	(\$0.0001)	(\$0.0014)
71	Interruptible Option - Partial	(\$0.0015)	\$0.0002	(\$0.0001)	(\$0.0014)

As noted above, there are three factors that comprise Dakota’s RTA: variations in the purchased power cost adjustment, the conservation cost adjustment, and the personal property tax adjustment. The purpose of the RTA is to allow DEA to adjust rates for variations from the predicted costs of each of these adjustments as compared to the rates determined in DEA’s most recent rate case. By design, the RTA is forward-looking, based on estimated costs for the upcoming year, and designed to ensure that there is no double recovery of costs in the RTA and in the base rates. In addition, the mid-year adjustment affords timelier matching of costs DEA incurs to serve customers with revenues from customers in these areas. The Department separately reviews the three components of Dakota’s proposed 2020 RTA below.

B. PURCHASED POWER COSTS

Dakota’s power cost adjustment is allowed under Minnesota Statutes section 216B.16, subdivision 7, the relevant part of which states:

¹² Petition, Schedule A1.

¹³ The RTA does not apply to service taken under Schedule 45 (Low Wattage Unmetered Service), Schedule 47 (Municipal Civil Defense Sirens), Schedule 81 (Cycled Air Metered), Schedule 82 (Cycled Air Residential), and Schedule 84 (Cycled Air Commercial).

... the Commission may permit a public utility to file rate schedules containing provisions for the automatic adjustment of charges for public utility service in direct relation to changes in ... federally regulated wholesale rates for energy delivered through interstate facilities ...[or] costs for fuel used in generation of electricity.

The rules governing power cost adjustments are specified in Minnesota Rules parts 7825.2390 to 7825.2920. Per Minnesota Rules part 7825.2600, subpart 2, Dakota is allowed to recover both demand costs and energy costs in its power cost adjustment, because Dakota purchases over 75 percent of its annual total kWh sales.

The purchased power cost adjustment is defined as the difference between the projected cost of power and DEA's base cost of power rate approved in its most recent rate case. Six months after each January 1, DEA compares the projected power cost against actual costs to determine whether a change in the power cost adjustment is necessary to zero out any over- or under-recovery accumulated since January 1. If an adjustment is necessary, the factor is changed beginning with power consumed in July. Since the aggregate power cost adjustment credit or charge is based on the projected level of sales, the actual credits or charges received will generally not equal the actual amounts incurred. To account for this difference, DEA performs a true-up calculation at the end of each fiscal year, and includes any net over- or under-recovery in the subsequent year's power cost recovery calculation.

The power cost adjustment is recovered from members on a kWh basis; however, the adjustment is not the same for all members and rate classes. The power cost adjustment for non-interruptible members includes both energy and demand costs, while the adjustment for members taking interruptible service¹⁴ includes only energy costs. The Department also notes that the base cost of energy varies according to the type of interruptible service. In particular, customers taking service under the Geothermal Heat Pump Rider rate schedule have a different power cost adjustment because the base cost of power used is \$0.0775 per kWh instead of the \$0.0903 per kWh used for other non-interruptible members.¹⁵

The Department reviewed DEA's calculation of the true-up and concludes that the calculation is accurate.¹⁶ The Department concludes that DEA's proposal to recover the difference between its base cost of energy and wholesale power costs through the power cost adjustment is appropriate.

C. DEMAND-SIDE MANAGEMENT AND CONSERVATION ADJUSTMENT

DEA's approved Demand-Side Management (DSM) and conservation spending additions from the previous calendar year are recovered from January 1 through December 31 of the next year. Dakota calculates the conservation adjustment by dividing the recoverable conservation tracker balance by the

¹⁴ Rate Schedules 51, 52, 70, and 71.

¹⁵ Petition, Schedule A1.

¹⁶ Petition, Schedule A2-1.

kWh sales projections. The recoverable conservation tracker balance is the balance leftover from the previous year (with a carrying charge adjustment) plus approved conservation expenses for the year in question, minus the conservation expenses recovered in base rates.

Dakota's DSM and conservation adjustment is allowed under Minnesota Statutes section 216B.16, subdivision 6b, paragraph (c) and section 216B.241, subdivision 2b, which state in relevant part:

[216B.16, subd. 6b(c)]: The Commission may permit a public utility to file rate schedules providing for annual recovery of the costs of energy conservation improvements.

[216B.241, subd. 2b:] The Commission shall allow a cooperative electric association subject to rate regulation under section 216B.026 [such as Dakota], to recover expenses resulting from energy conservation improvement programs, load management programs, and assessments and contributions to the energy and conservation account unless the recovery would be inconsistent with a financial incentive proposal approved by the Commission.

On May 8, 2018 in Docket No. E111/M-17-821, the Commission authorized DEA to recover the capital costs associated with its new load control receivers through the conservation component of DEA's RTA, with the conditions that the costs must satisfy the requirements of Minn. Stat. §216B.16, subd. 6b (c) and (d), and be approved by the Deputy Commissioner of the Department. In accordance with the Commission's Order, DEA included its forecasted 2020 capital costs for new load control receivers for the first time in the instant petition and recently made a request to the Department for approval by the Deputy Commissioner.¹⁷ The Deputy Commissioner approved Dakota's request in a letter dated March 6, 2020. As a result, the Department concludes that Dakota complied with the Commission's May 8, 2018 Order in Docket No. E111/M-17-821.

DEA proposed a 2020 DSM and conservation adjustment of \$389,404, including a \$69,082 under-recovery for 2019, as shown on Schedules A3 and B2 of the Petition. The Cooperative expects to have an under-recovered balance of \$25,776 at the end of 2020.¹⁸ The Department reviewed DEA's calculation of the DSM and conservation adjustment and concludes that the calculation is accurate. The Department concludes that DEA's proposed DSM and conservation adjustment is appropriate.

¹⁷ Dakota's 2020 RTA, Schedule E-3 and Schedule E, page 2 of 2.

¹⁸ Dakota's 2020 RTA, Schedule A3.

D. PERSONAL PROPERTY TAX ADJUSTMENT

DEA stated on page 2 of its 2020 RTA that, prior to its 2017 RTA, it was not permitted to include a property tax adjustment within its RTA if the Cooperative's conservation improvement program (CIP) spending fell below 1.75 percent of gross operating revenue. DEA stated that the passage of Minnesota Statute 216B.1647 in the 2016 Minnesota Legislative Session removed this requirement. As a result, DEA is eligible to file with the Commission for approval an adjustment for real and personal property taxes, fees, and permits in its annual RTA.

Dakota calculates its property tax adjustment by allocating the incremental annual property tax expense to each rate class according to the property tax allocation factors from the most recent approved class cost of service study. DEA then divides these allocated amounts by projected rate class retail energy sales to arrive at the adjustment for each class. The incremental annual property tax expense is the forecasted annual property tax expense not recovered in base rates, adjusted for any over- or under-recovered balance from the prior year.

The Department reviewed DEA's calculation of the true-up and concludes that the calculation is accurate.¹⁹ The Department concludes that DEA's proposal to recover the difference between its base level of personal property taxes and projected personal property taxes through the personal property tax adjustment is appropriate.

E. COMPLIANCE WITH COMMISSION ORDERS

In its April 22, 1996 *Order* in Docket No. E111/M-95-1395 approving the RTA, the Commission ordered DEA to provide the following information as part of its future filings:

- The finalized current year's total real and personal property tax bill and its proposed filing to true-up its annual tax adjustment rider.
- Information to verify that the incremental real and personal property tax recovery is limited to known and actual gross revenues and conservation expenditures.

The Department notes that DEA submitted the relevant information set forth in the Commission's April 22, 1996 *Order*.

The Department also reviewed DEA's 2020 RTA to ensure that it preserved the existing rate design. In Docket No. E111/M-95-1395 concerning the RTA, DEA and the Department agreed that the increased tax expense should be allocated to the customer classes based on the class-cost-of-service method in

¹⁹ Dakota's 2020 RTA, Schedules A4-1 to A4-3.

DEA's most recent rate case. DEA's most recent rate case was approved by the Commission in its June 8, 2015 *Order* in Docket No. E111/GR-14-482. As part of this filing, DEA submitted a schedule detailing the allocation of taxes to the various classes, along with the net recoverable balance after any over- or under-recovery. A review of the schedule indicates that DEA allocated its taxes among the rate classes in compliance with the Commission's April 22, 1996 *Order*.

The Department concludes that DEA complied with the Commission's *Order* in Docket No. E111/M-95-1395.

IV. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission accept Dakota's FYE19 AAA filing.

The Department recommends that the Commission approve Dakota's proposed 2020 RTA factors.

/ja

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
Public Comments**

Docket No. E111/M-20-79

Dated this **9th** day of **March 2020**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-79_M-20-79
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-79_M-20-79
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_20-79_M-20-79
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-79_M-20-79
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-79_M-20-79
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-79_M-20-79
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_20-79_M-20-79
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-79_M-20-79
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-79_M-20-79
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-79_M-20-79