

December 15, 2014

Burl W. Haar  
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. E148,E228/SA-14-824

Dear Dr. Haar:

On September 26, 2014, the Delano Water, Light, and Power Commission (the Municipal) and Wright Hennepin Cooperative Electric Association (the Cooperative), collectively the Parties, jointly filed a request that the Minnesota Public Utilities Commission (Commission) modify the Parties' existing electric service territory boundaries.

On November 12, 2014, the Minnesota Department of Commerce, Division of Energy Resources (Department or DOC) filed comments recommending that the Commission approve the requested service territory boundary transfer from the Cooperative to the Municipal; allow the Municipal to serve-by-exception three meters in the Cooperative's service territory; and allow the Cooperative to serve-by-exception one customer in the area to be served by the Municipal.

On December 5, 2014, a customer affected by the boundary change submitted comments to the Commission indicating that she recently invested \$4,000 to install an off-peak water heater and air conditioner, and would be adversely affected if the requested transfer as proposed, is approved by the Commission.

On December 10, 2014, the Commission issued a request for comments on four specific topics regarding the December 5, 2014 comments of the affected customer. The Commission stated the initial comment period closes December 17, 2014 at 4:30 pm, and the reply comment period closes December 22, 2014 at 4:30 pm.

On December 11, 2014, the Department submitted DOC Information Request Nos. 1 – 3 to the Municipal, and DOC Information Request Nos. 4 – 6 to the Cooperative. The information requests all relate to concerns initially raised by the affected customer. The standard eight business day response period results in the responses not being due until December 23, 2014, which is after the due date the Commission set for both the initial comment period (December 17, 2014 at 4:30 pm) and the reply comment period (December 22, 2014).

The Department requests that it be allowed to file comments after it receives responses from the Parties regarding DOC Information Request Nos. 1 – 6; even if it may be after the close of the comment period.

Sincerely,

/s/ DALE V. LUSTI  
Financial Analyst

DVL/lt

## **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. E148,228/SA-14-824**

Dated this 15<sup>th</sup> day of December 2014

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Hal	Becker	hbecker@delanomn.us	Delano Municipal Utilities	P.O. Box 65 11 Bridge Ave W Delano, MN 55328	Electronic Service	No	OFF_SL_14-824_SA-14-824
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