

Sobalvarro & Hauptert
Attorneys
11 7th Ave. N., Suite 100
St. Cloud, MN 56303

July 21, 2017

-- VIA ELECTRONIC FILING --

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 East Seventh Place, Suite 350
St. Paul, Minnesota 55101

Re: Response of UNG to Questions attached to the Notice of Comment Period
Docket No. G6960/M-16-214

Dear Mr. Wolf:

Introduction

Please consider this United Natural Gas, LLC's ("UNG") responses to the questions attached to the Notice of Comment Period, issued June 21, 2017 by the Minnesota Public Utilities Commission ("Commission"), Docket No. G6960/M-16-214. The questions posed by the Commission are in relation to a request by UNG for exemption from regulation of the Minnesota Public Utilities Commission ("Commission") to provide incidental service to the public outside the borders of municipalities. UNG seeks to provide incidental service to the public along the natural gas lines that will be constructed for UNG to provide natural gas service to the Lower Sioux Indian Community, a federally recognized Indian tribe, in the State of Minnesota (the "Community").

- 1. Have the municipalities of Lafayette and Courtland been contacted about UNG's proposed expansion of its service area to include the Lower Sioux Indian Community (Lower Sioux)? If so, provide all communications between UNG, Lafayette, Courtland and the Lower Sioux.**

Representatives of the municipalities of Lafayette and Courtland have been contacted regarding the expansion of service to the Community. There has been no written communication with the municipalities of Lafayette and Courtland concerning the

expansion of service to the Community. All communication on the issue was verbal. Doug Lund with UNG met with representatives of the City of Lafayette to discuss the matter in early June 2017 and with the City Manager of the City of Courtland in late May 2017. Mr. Lund described the proposed project at these meetings. Representatives of Lafayette and Courtland did not express any concerns about the expansion of service to the Lower Sioux Indian Community.

- 2. Has UNG communicated to the municipalities of Lafayette and Courtland, and the Lower Sioux that the Commission has authority under Minn. Stat. § 216B.16, subd. 12 to ensure customers who receive incidental service outside the municipal boundaries of Lafayette and Courtland are being treated fairly? And that the Commission may investigate such service on its own motion or upon complaint, pursuant to Minn. Stat. § 216B.17? If so, provide an explanation of how this was communicated. If not, provide an explanation detailing why this has not been communicated to these customers.**

The municipalities of Lafayette and Courtland have been informed of the authority of the Commission through informational meetings that were conducted when UNG expanded services to these communities. The municipalities, customers, and potential customers were advised that of the Commission's authority under Minn. Stat. § 216B, including the Commission's authority to investigate complaints and ensure customers are treated fairly. The municipalities of Lafayette and Courtland have also been provided with the Rate Book that indicates UNG is requesting an exemption pursuant to Minn. Stat. § 216B.16, subd. 12. All customers of UNG receive the same rate regardless of whether they are a resident of Lafayette or Courtland or if they are receiving "incidental service" outside these municipalities. Furthermore, the rates charged by UNG are determined by the Local Rate Board. The municipalities of Lafayette and Courtland and the Township of Lafayette Township each have a representative on the Local Rate Board. The Community will also have a representative on the Local Rate Board. The Community has also been advised of the Commission's authority by UNG. UNG has participated in several in-person meetings with members of the Community's Tribal Council and attorney. The authority of the Commission has been discussed at length with the Community's Tribal Council and attorney.

- 3. Provide UNG's explanation for considering the proposed Lower Sioux load as "incidental" to its existing small gas utility exemption.**

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 does 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.

4. 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.16, subd. 12?

The Community is a federally recognized Indian tribe. As a federally recognized Indian tribe, the Community is exempt from regulation of the Commission. Since UNG is seeking to provide the Community with natural gas services, UNG's provision of natural gas to the Community is exemption from regulation by the Commission. Indian tribes are unique aggregations possessing attributes of sovereignty over both their members and their territory, See *Worcester v. Georgia*, 31 U. S. 557 (1832). Indian tribes are "a separate people" possessing "the power of regulating their internal and social relations . . ." *United States v. Kagama*, 118 U.S. 375, 382 (1886). As previously stated, it is a general rule that state law does not apply to the affairs of Indian tribes within their territory, absent the consent of Congress. "The policy of leaving Indians free from state jurisdiction and control is deeply rooted in the Nation's history." *Rice v. Olson*, 324 U.S. 786, 789 (1945). The United States Supreme Court has stated on the issue of whether a state has authority over a non-tribal member on tribal property that "absent governing Acts of Congress, the question has always been whether the state action infringed on the right of reservation Indians to make their own laws and be ruled by them." *Williams v. Lee*, 358 U.S. 217, 220 (1959). "[I]t is as uniformly held that, absent a treaty or federal statute conferring it, a state's jurisdiction does not extend over the individual members of an Indian tribe maintaining their tribal relations and organization upon a reservation within the geographical limits of the state." *State v. Jackson*, 16 N.W.2d 752 (1944). "Such tribes are domestic, dependent communities under the guardianship, protection, and exclusive jurisdiction of the federal government, with the power of regulating their own internal and social relations, except as otherwise directed by congress." *Id.*

A recent case decided by the North Dakota Supreme Court confirmed that the Community is exempt from regulation. In *North Central Electric Cooperative v. North Dakota Pub. Serv. Comm'n*, 837 N.W.2d 138 (2013), the issue of whether the North

Dakota Public Service Commission had regulatory authority over Otter Tail Power Company, an organization that provided electric service to the Turtle Mountain Band of Chippewa Indians on tribal land. Initially, the Public Service Commission determined that it lacked authority to regulate the tribe's discretion as to who was to provide electrical services to the tribe. The Public Service Commission's decision was appealed by a rival power company. Ultimately, the North Dakota Supreme Court affirmed the decision that the Public Service Commission did not have regulatory authority over the tribe's decision to authorize Otter Tail Power Company to provide electrical service. *Id.* at 146. The tribe's regulatory discretion with respect to electrical service is a power of the tribe's "inherent tribal sovereignty." *Id.*

Additionally, the Federal District Court for the District of North Dakota addressed a similar issue in *Devils Lake Sioux Indian Tribe v. North Dakota Pub. Serv. Comm'n*, 896 F. Supp. 955 (D.N.D 1995). This case concerned whether the North Dakota Public Service Commission could regulate the decision as to which electrical service supplier a tribe used. The court reasoned that "the Tribe has the inherent sovereignty to contract with whomever it will for the provision of service to its lands and businesses, [which] takes precedence over the actions of the [s]tate" *Id.* at 957. The court ruled that "the Tribe may by resolution or contract determine who is to supply electrical service to Tribal owned businesses located upon Indian owned or trust lands, without regard to the rate structure or other regulations of the North Dakota Public Service Commission." *Id.* at 961.

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.

- 5. Provide a full explanation of UNG's service proposal to the Lower Sioux, including the initial number of customers and, if known, the total number of potential customers within the Lower Sioux. Provide the projected volumes by customer that UNG is assuming in its financial studies.**

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. The estimated annual therm usage for these locations is 619,750. 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 customers is estimated to be 150,000. UNG contracted for the construction of a pipeline to supply gas to the Community. UNG shall provide natural gas through this pipeline to the Community at a rate flow up to 444 therms per hour and 10,656 therms per day. 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.

6. **Provide an explanation, including the underlying rate calculations and underlying cost assumptions, for the proposed rate structure that UNG proposes to charge the Lower Sioux and how these rates compare to the rates charged to the municipalities of Lafayette and Courtland, and the related “incidental” customers on that portion of its natural gas system.**

All UNG customers in Lafayette, Courtland, the Community (except for the casino), and any customers receiving “incidental” service pay the same rates in accordance with the Rate Book. Rates are calculated by adding the cost of the gas provided plus a delivery charge. The delivery charge takes into account UNG’s operating expenses in addition to return on investment. Currently, UNG’s Rate Book provides the following rates on a per therm basis:

<u>Cost of Gas</u>	<u>Delivery Charge</u>
Residential	\$0.65
Small Commercial	\$0.60
Large Commercial	\$0.45
Interruptible	\$0.30

These are the same rates that the Commission approved in 2016. As part of UNG’s agreement with the Community, fees for natural gas service provided to the casino consist of the cost of gas plus a fixed monthly fee and fixed delivery charge that is not subject to change pursuant to the Rate Book.

7. **Does the proposed Lower Sioux expansion provide positive benefits to UNG with respect to its overall financial stability, and relative to service UNG provides to the municipalities of Lafayette and Courtland? If so, provide an explanation of benefits to these customers.**

It is expected that expanding service to the Community will provide benefits to UNG and its financial stability along with added benefits to UNG’s customers. The expanded

service will allow UNG to better utilize the Town Border Station at Lafayette. The increased flow through the pipeline will allow UNG to maximize efficiency with respect to UNG's transportation agreement with Hutchinson Utilities. The increase in volume may allow UNG to obtain better natural gas rates. While the expansion of services to the Community will result in additional variable operating costs, UNG's fixed operating costs will remain the same and will essentially be spread out between more customers. This will result in a benefit to UNG and its customers.

- 8. 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. Provide all communications with possible "incidental" customers, where UNG is soliciting their business, along with an explanation of UNG's outreach program to these customers.**

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. Contact with these potential customers has been limited to verbal conversations in person and over the telephone. Potential customers have been informed about UNG's plan to expand service to the Community and UNG's desire to be able to provide service to potential customers along the pipeline. Potential customers have been provided with information relating to the costs and benefits associated with UNG providing natural gas service. Several individuals have contacted UNG and inquired about receiving natural gas service in the area. Information provided to potential customers has been limited since UNG does not know whether it will be allowed to provide service to these potential customers.

- 9. With respect to the proposed construction route for the pipeline from UNG to the Lower Sioux, has UNG contacted unserved municipalities located near the proposed route soliciting their business? If so, provide all correspondence between the parties. If not, provide an explanation as to why these municipalities have not been contracted. If the customers have indicated they would like service, but were denied service by UNG, provide an explanation for the denial.**

UNG has not contacted unserved municipalities located near the proposed pipeline route for the purpose of soliciting business. UNG has not been in the practice of soliciting municipalities for the purpose of providing natural gas service. UNG has only worked

with municipalities that have approached UNG about providing natural gas service. No municipalities have expressed an interest to UNG about receiving natural gas service. It is a business decision by UNG to not solicit additional business from municipalities at this time. UNG wishes to complete the project to the Community before other projects are considered. Also, geological studies have indicated that installation of pipelines to some municipalities, such as the City of Morton, may not be feasible or cost effective. No municipalities have sought natural gas service from UNG and been denied service.

- 10. Has UNG received any complaints about its service from its customers or the municipalities of Lafayette or Courtland? If so, provide those complaints and an explanation of how the complaints were resolved.**

UNG has received only one complaint from a customer. A small commercial customer within the City of Lafayette believed that gas usage was too high compared to the customer's prior use of propane. The customer was under the belief that there was either leak or the meter was incorrect. UNG investigated the issue by conducting a leak test and testing the meter to ensure it was operating properly. The investigation did not reveal any leaks and the meter was operating properly. The customer contacted the third party that converted the customer's property to natural service company and discovered issues with the property that caused the increased gas usage that was not related to UNG or the services provided by UNG.

- 11. Has UNG communicated with its "incidental" service customers regarding their service rights? If so, provide all communication with those customers. How often does UNG plan to communicate with or notify these "incidental" customers regarding their service rights?**

UNG regularly communicates with its "incidental" service customers through use of brochures and information packets that are included with account statements. Brochures and informational packets include safety information and required notices and information regarding the cold weather rule.

- 12. Provide UNG's rate committee minutes for every meeting that has been held and an explanation of any rate changes that have been discussed or that were the result of these meetings.**

The UNG Local Rate Board has not yet met since being organized in 2016. No rate changes have been discussed or implemented. The Rate Book that was approved by the Commission in 2016 is still in effect without any changes.

13. Any other issues relevant to the Commission's review of UNG's request to expand its services to include the Lower Sioux Indian community.

All relevant issues have been addressed by UNG in its responses to the previous questions.

Sincerely,

SOBALVARRO & HAUPERT

By 

Gregory J. Hauptert

ghauptert@parthenonagency.com

GJH/lkp

Enclosures

cc: Darv Turbes via email
Doug Lund via email



Cold Weather Rule - Third Party Designation Form

Customer Name: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Phone: _____

Account Number from Gas Billing: _____

I give my permission to United Natural Gas to provide information and accept information for the party named below:

Customer Signature: _____ Date: _____

Name of Third Party to be Notified: _____

Address: _____

City: _____ State: _____ Zip Code: _____

Phone: _____

Third Party Signature: _____ Date: _____

(This request cannot be accepted without the third party's signature.)

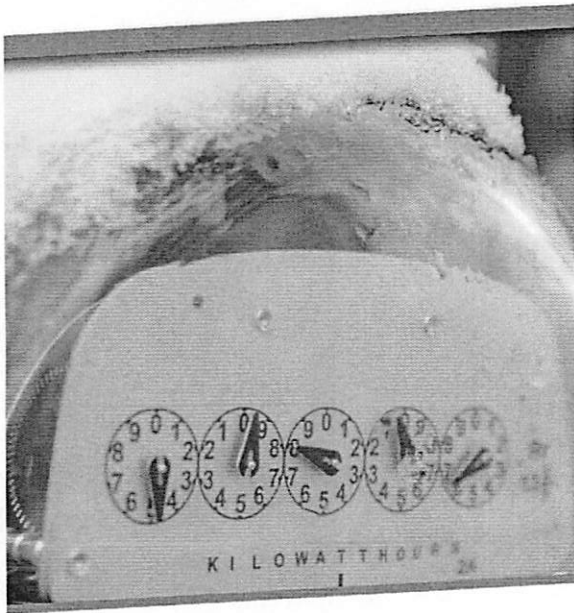
United Natural Gas will make every effort to send a copy of the Disconnection Notice to the party specified. The customer making the request understands that United Natural Gas is not liable should the third party fail to receive or act upon the notice.

For your convenience, complete this form and return it with your next gas bill or mail it to:

United Natural Gas
705 E. 4th Street
P.O. Box 461
Winthrop, MN 55396



Winter Safety Courtesy Reminder

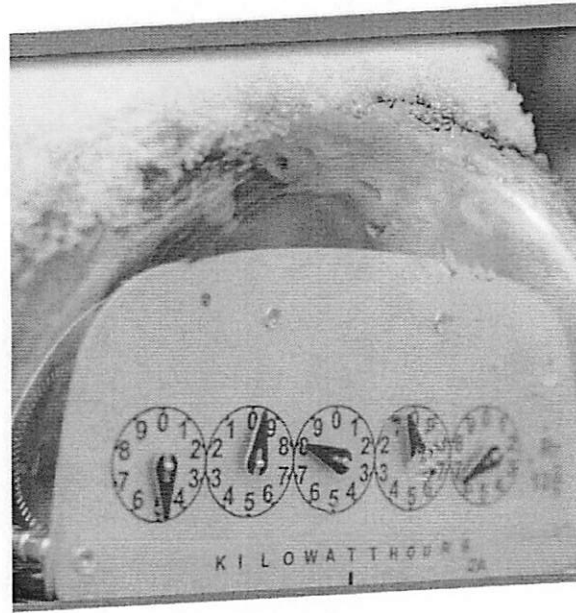


Snow or Ice Removal Required

As you are aware, a field technician reads and inspects your meter on a monthly basis to provide you with accurate billing of natural gas consumed. While your meters is designed to withstand winter weather, heavy or hard packed snow and ice on your meter can be a safety hazard.



Winter Safety Courtesy Reminder

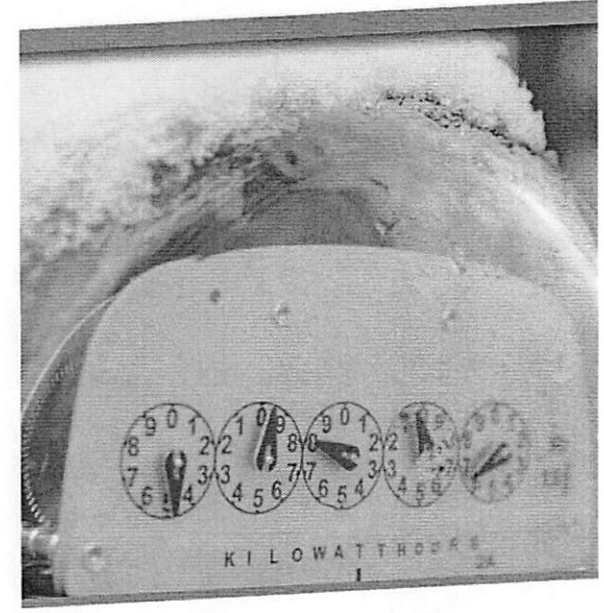


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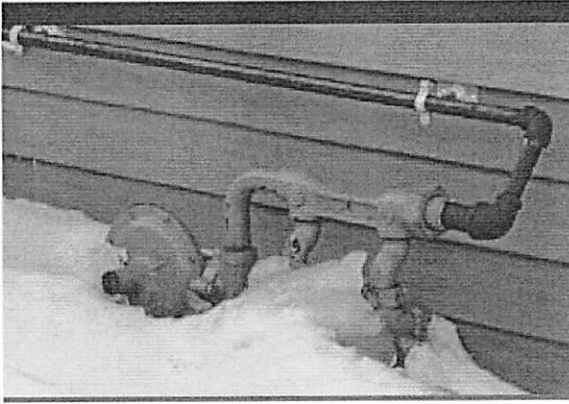


Winter Safety Courtesy Reminder



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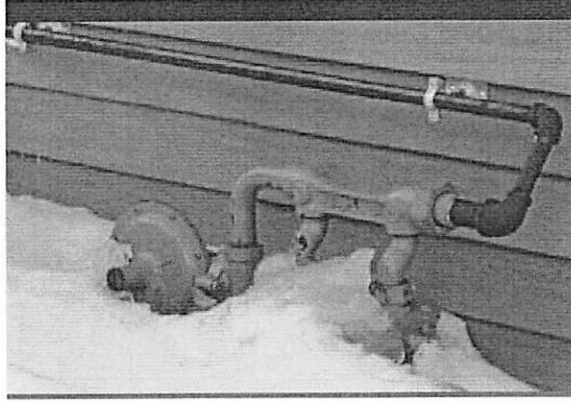
As you are aware, a field technician reads and inspects your meter on a monthly basis to provide you with accurate billing of natural gas consumed. While your meters is designed to withstand winter weather, heavy or hard packed snow and ice on your meter can be a safety hazard.



Customers should:

- Maintain a clear path to and from the meter to allow safe access in the event of an emergency and for the safety of your meter reader.
- Carefully shovel around the meter. Do not use your snow blower near the meter or piping.
- Gently remove snow or ice by hand from the gas meter and any associated piping. Avoid using any sharp tools or shovels on or near your meter.
- Check to ensure that melting snow or ice is not dripping on the meter from the roof, which can plug the gas meter regulator vent.

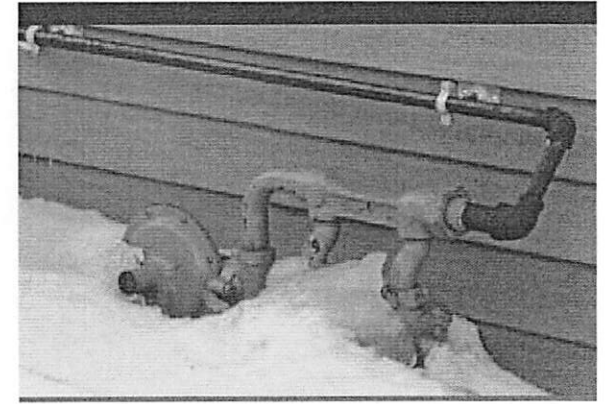
By following these safety steps you can avoid having a plugged meter regulator vent which can lead to a potentially hazardous natural gas pressure build up condition.



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By following these safety steps you can avoid having a plugged meter regulator vent which can lead to a potentially hazardous natural gas pressure build up condition.



If you suspect a problem with your gas meter call United Natural Gas immediately at 507-647-6602.

If you smell natural gas in your home, leave immediately without turning on lights or using any other electrical switches, including garage door openers.



Thank you for choosing United Natural Gas and for your cooperation with this safety message.



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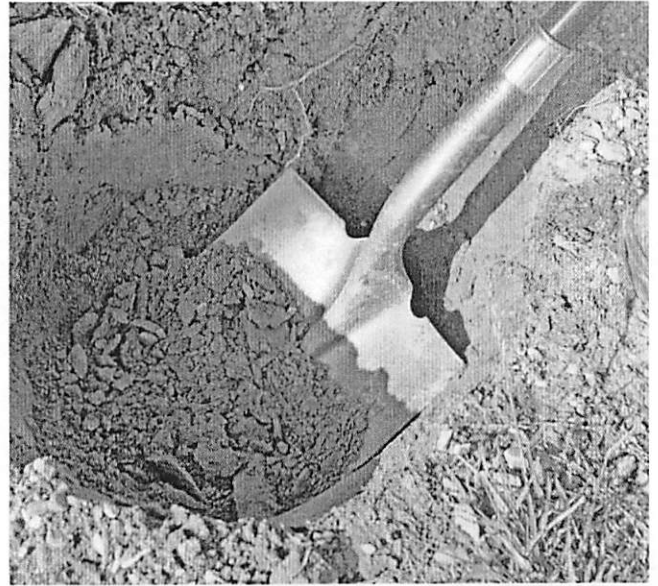


Digging? Call Before You Dig!

Know what's below.
Call before you dig.

You must contact Gopher State One Call at least two business days before you plan to dig. Your underground utilities lines will be marked free of charge to prevent damage or interruption of service.

Call 800-252-1166 or Dial 811.



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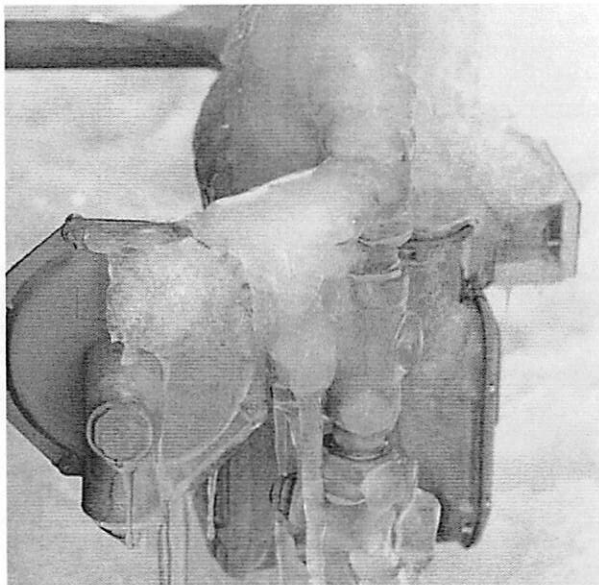
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Meter Safety

During winter, heavy snow and ice can build up on or near meters, causing potentially dangerous conditions. Although meter problems due to weather are uncommon, keeping the meter area and path to your meter clear of snow, leaves and debris will help to prevent these conditions.

- Snow or ice formations are visible on or above the meter
- Meter is located below a down spout.
- Overhang or eave does not fully extend over the meter.
- Meter is located below a roof valley without a gutter.
- Meter is located below an exterior water spigot.

If you observe one or more of the conditions above, report it to United Natural Gas by calling 507-647-6602



GOPHER STATE ONE CALL
This time and every time.

Call Before You Dig!

It's very simple... and it's the law.

Gopher State One Call helps serve and protect homeowners, excavators and facility operators across Minnesota.

Planning an excavation project? Let GSOC know at least two days before you plan on digging. You can call or submit an E-Ticket online, or even submit a ticket from your smartphone.

Gopher State One Call notifies the underground facility operators located in the area where your project will take place. Utility lines are marked so you can avoid them during your dig.

Contact GSOC before you dig!
www.gopherstateonecall.com
Call GSOC at 800-252-1166

Pipeline Markers

Pipelines are marked by aboveground markers (signs, placards or stakes) to provide an indication of their presence, approximate location, and product carried, and the name and contact information of the company that operates the pipeline.

The presence of these markers does not remove the need for a call to GSOC prior to excavation!

They give an approximate indication of where a pipeline might be and must be verified through placement of a call to GSOC.



Natural Gas Safety



What to do if a Leak Occurs

1. Turn off any equipment and eliminate any ignition sources without risking injury
2. Leave the area by foot immediately and try to directly any bystanders to leave the area.
3. From a safe location, immediately notify the pipeline operator and call 911 or the local emergency response number. The operator will need your name, your phone number, a brief description of the incident and the location so the proper response can be initiated.

What to NOT TO DO if a Leak Occurs

DO NOT provide any potential source of ignition, such as flipping an electrical switch, starting a motor vehicle or lighting a match.

DO NOT come into direct contact with any escaping liquids or gas.

DO NOT drive into a leak or vapor cloud while leaving the area.

DO NOT attempt to operate any pipeline valves yourself nor attempt to extinguish a petroleum product or natural gas fire. Wait for local firemen and other professionals trained to deal with such emergencies.

How to Recognize a Leak

Sight: Indicated by bubbles in wet or flooded areas, distinct patches of dead vegetation, dust blowing from a hole in the ground, or flames, if the leak is ignited.

Sound: Volume can range from quiet hissing to a loud roar, depending on the size of the leak and pipeline system.

Smell: Since natural gas is colorless and odorless our pipelines contain odorized gas which smells similar to rotting eggs.

When natural gas equipment is properly installed and maintained, the danger of injury or CO poisoning is practically non-existent. For your safety, have your gas burning appliances inspected **ONCE PER YEAR** by a qualified technician.

Carbon Monoxide Poisoning

Carbon monoxide (CO) is a poisonous gas that is colorless, odorless, and tasteless. CO can build up indoors and poison people and animals who breathe it.

The most common symptoms of CO poisoning are headache, dizziness, weakness, upset stomach, vomiting, chest pain, and confusion. CO symptoms are often described as “flu-like”.

If you suspect CO is present:

- Open windows to ventilate the area.
- Shut off your furnace and other fuel-burning appliances.
- If you are experiencing carbon monoxide poisoning symptoms get everyone, including pets, out of your home or building and **call 911**.



Energy Conservation Tips:

- Install a programmable thermostat.
- Lower thermostat during the night hours.
- Install a hot water heater blanket.
- Lower the temp of your hot water heater.
- Reduce hot water usage by shortening showers.
- Block drafts around doors and windows.
- Cover your windows with plastic during heating season.
- Wash clothes in cold water whenever possible.
- Hang your clothes to dry.
- Replace your furnace filters.
- Add caulk and weather strips to door and windows.
- Open your shades during sunlight hours.
- Promptly replace any broken windows.
- Remove window air conditioners during the winter months.
- Immediately fix any leaky faucets.
- Get your furnace checked once a year by a licensed professional.

Energy Assistance

If you are having trouble paying your energy bill please refer to the agency who may be able to help.

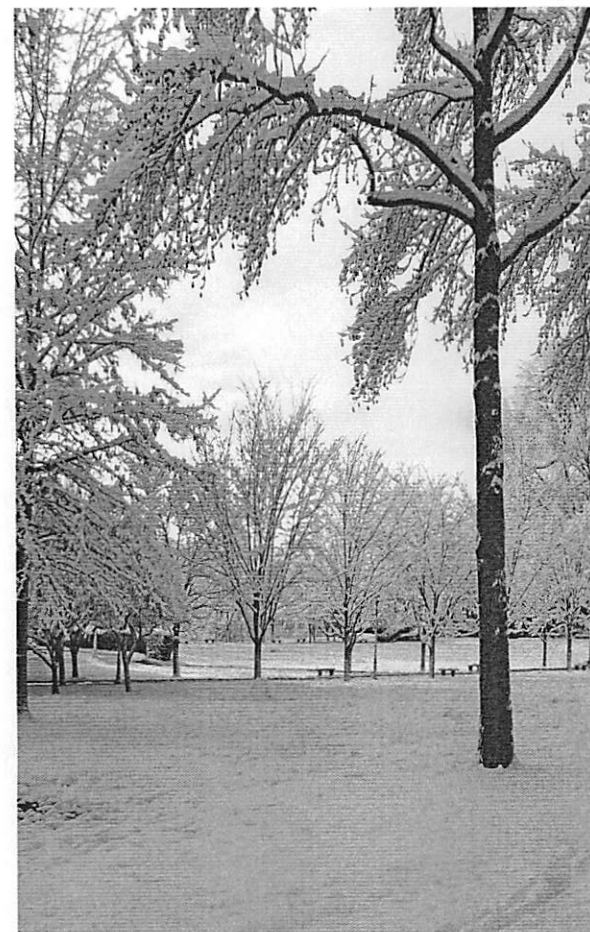
Nicollet County

Social Services:

507-934-8559

Minnesota Valley Action Council:

507-934-5224



Contact Us

United Natural Gas
705 East 4th Street
PO Box 461
Winthrop, MN 55396

507-647-6602
Toll Free 888-832-5734



Minnesota Cold Weather Rule



Minnesota Cold Weather Rule

The State of Minnesota established the Cold Weather Rule (CWR) to protect residential heat-affected customers from disconnection when they experience difficulty paying their bills during the winter months. Minnesota's CWR runs **October 15th - April 15th** of each year. This information is intended to provide you with helpful information regarding CWR. In this brochure you will learn:

- Steps to Prevent Disconnection
- Steps for Reconnection
- Your Right to Appeal
- Your Option for Third Party Notification

We are Here to Help!

To be protected you must contact United Natural Gas (UNG) to discuss your account, pay your bill in full, or set up a payment arrangement (no written application required).

**Call us toll-free at
888-832-5734**

Payment Arrangement Conditions

For customers over the 50% median income*:

- You may enter into a mutually agreed Payment Agreement that expires April 15th.
- You may choose to enroll in our Secure Pay Plan.

For customers at or below the 50% median income*:

- You may qualify to pay no more than 10% of your monthly household income.
- Plan expires April 15th.

Failure to Keep Your Arrangement

If you are unable to keep your Payment Agreement, call us right away toll-free at 888-832-5734. Failure to keep us your Payment Agreement may result in:

- Disconnection
- No further notice is required by UNG

Right to Appeal

If you and UNG cannot agree on the terms of Payment Agreement you have the right to appeal. You must appeal within 10 working days to the Minnesota Public Utilities Commission (MPUC) by calling 1-800-657-3782 or visit their website at mn.gov/puc/. During the appeal process UNG will not disconnect your service as defined under CWR.

*You must provide proof of income to a qualified agency.



Third Party Notification

You may delegate a third party to be notified if a disconnection notice is sent to you. This can be a friend, relative, church or community action agency. If you live alone, are a senior citizen, are disabled or cannot read English this program could be beneficial to you. Your third party can be provided and receive information on your behalf. They are not required or responsible for your bill.

Please contact UNG if you are interested in delegating a third party and a form will be mailed to you.



Notice of right to appeal payment arrangement schedule.
Appeal must be filed within 10 working days.
(form may be faxed)

Because we were unable to agree on a payment arrangement schedule, you have the right to appeal to the Minnesota Public Utilities Commission.

You must file an appeal by sending this form to the Commission within 10 working days of date of notice.

If the commission agrees to your payment arrangement or orders a different schedule, United Natural Gas (UNG) will honor it as long as the payment continue to be made on time. You must make your payments according to the schedule ordered by the Commission or your natural gas service will be disconnected. If your circumstance change and you are no longer able to make your payment, you may contact UNG to request a modification.

If you do not agree to a payment agreement and do not appeal, your natural gas service will be disconnected without further notice. If you appeal, your service will not be disconnected during the appeal process.

Section 1: TO BE COMPLETED BY UNG

Date Notice Sent: [] Natural gas service disconnected [] Natural gas service not disconnected

Customer Name(s):

Service Address:

City: State: Zip Code:

Account Number: Date of Last Bill:

Total natural gas bill in arrears: \$

Payment arrangements proposed by United Natural Gas:

(Estimated) Current charges \$ + (Installment Amount) for arrears \$

= Total Amount Due \$

Payment arrangement begins wit your current due date over the next months.
(*Please not that you must have payments within the office by the due date)

Name of UNG Represenative Date

If you have any additional questions, please call toll free number: 888-934-3411

Section 1: TO BE COMPLETED CUSTOMER

Payment arrangements proposed by customer:

(Amount) \$ would be due on (date) over the next months.

How many people live in your home, including yourself?

What is your monthly gross income of all persons in your home? \$

(Please include all montly gross income with this form. Attach additional information as needed.)

(Print Name)

(Phone)

(Customer Signature)

(Date)

Please send your appeal to the following address:
Minnesota Public Utilities Commission
Consumer Affairs Office (Cold Weather Rule)
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Telephone: 651-296-0406
Toll Free: 1-800-657-3782
Fax: 651-297-7073
Email: consumer.puc@state.mn.us
Web: mn.gov/puc

*Please attach additional information regarding your situation