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July 18, 2014

Dr. Burl Haar, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

***Subject: Reply Comments of Dakota Electric Association to  
Notice of Comment Period on Completeness and Procedures  
Docket No. E-111/GR-14-482***

Dear Dr. Haar:

On July 7, 2014, the Minnesota Public Utilities Commission (MPUC or Commission) issued a Notice of Comment Period on Completeness and Procedures (Notice) for Dakota Electric Association's (Dakota Electric or Cooperative) general rate case application in the above-referenced docket. The Notice indicates that the following topics are open for comment:

- Whether Dakota Electric Association's application complies with the filing requirements of Minn. Stat. § 216B.16, Minn. Rules, Parts 7825.3100 to 7825.4400, and relevant Commission Orders, and
- Whether this matter should be sent to the Office of Administrative Hearings for a contested case hearing and if so, what the scope of the hearing should be.

Comments in this matter were submitted by the Minnesota Department of Commerce – Division of Energy Resources (DOC or Department). Following is a summary of the comments submitted by the Department and Dakota Electric's reply comments.

### **Department of Commerce Comments**

The Department of Commerce comments indicate that, based on their review, Dakota Electric's filing complies with the filing requirements contained in Minnesota Statutes, Minnesota Rules, Commission Policy, and prior orders.

Regarding scope, the Department recommends that the Commission request that the following issues be addressed, along with any particular issues the Commission would like to see developed in this proceeding:

- (1) Is the test year revenue increase sought by the Association reasonable or will it result in unreasonable and excessive earnings?
- (2) Is the rate design proposed by the Association reasonable?
- (3) Are the Association's proposed capital structure, cost of capital, and return on equity reasonable?

Based on its review, the Department recommends that the Commission:

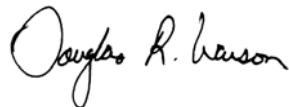
1. accept DEA's rate case filing in the present docket as complete; and
2. refer this matter to the Office of Administrative Hearings.

### **Dakota Electric Reply Comments**

Dakota Electric concurs with the Department's conclusions and recommendations that our general rate case filing is complete and that this matter should be referred to the Office of Administrative hearings.

If you or your staff has any questions regarding these reply comments, please call me at (651) 463-6258.

Sincerely,



Douglas R. Larson  
Vice President of Regulatory Services  
Dakota Electric Association  
4300 220<sup>th</sup> Street West  
Farmington, MN 55024

## **Certificate of Service**

I, Cherry Jordan, hereby certify that I have this day served copies of the attached document to those on the following service list by e-filing, personal service, or by causing to be placed in the U.S. mail at Farmington, Minnesota.

**Docket No. E-111/GR-14-482**

Dated this 18th day of July, 2014

/s/

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Cherry Jordan

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