



September 10, 2021

Will Seuffert, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

Subject: Dakota Electric Association Comments

***In the Matter of an Inquiry into Actions by Electric and Natural Gas
Utilities in Light of the COVID-19 Pandemic Emergency
Docket Nos. E,G-999/CI-20-375***

Dear Mr. Seuffert:

On May 26, 2021, the Minnesota Public Utilities Commission (Commission) issued an Order in this docket laying out the requirements for regulated utilities to transition back to more normal utility operations. As part of this order, the Commission included Ordering Point No. 5, which states:

The Commission prohibits disconnections of customers with past due balances who have a pending application or have been deemed eligible for LIHEAP [Low Income Home Energy Assistance Program]/EAP [Energy Assistance Program] assistance for the duration of the transition period (April 30, 2022).

On September 9, 2021, Minnesota Housing filed a Letter in the above referenced docket notifying the Commission that Minnesota Housing is currently implementing the COVID-19 Emergency Rental Assistance Program, commonly known as RentHelpMN. Minnesota Housing explained that this program has

been allocated significant funding and is a vehicle for eligible applicants to receive rental assistance and assistance with their utility bills as a result of financial hardship from the Covid-19 pandemic. In light of the ability of this program to help individuals with their utility bills, Minnesota Housing requested that the Commission modify its May 26, 2021 Order to include the COVID-19 Emergency Rental Assistance program as a listed program alongside LIHEAP/EAP prohibiting disconnections of customers with past due balances who have a pending application or have been deemed eligible for assistance for the duration of the transition period.

In response to Minnesota Housing's filing, the Commission issued a Notice of Comment Period (Notice) on September 9, 2021 requesting comment by September 15, 2021 on whether the Commission should approve the request of Minnesota Housing.

Dakota Electric Association® (Dakota Electric or Cooperative) provides these brief comments in response to the Commission's September 9, 2021 Notice. At a conceptual level, Dakota Electric does not oppose Minnesota Housing's request; however, there are practical issues that must be addressed. Dakota Electric notes that, from a utility perspective, the verification process for the RentHelpMN program is different from LIHEAP/EAP. When a member tells Dakota Electric that they have, or plan to, applied for LIHEAP/EAP assistance, the Cooperative is readily able to verify the existence of a pending application through the eHeat portal. When Dakota Electric sees a pending application, it stops the disconnection process. However, to Dakota Electric's knowledge, a similar verification process or portal does not exist (or the Cooperative does not have access to it) for the RentHelpMN program. As such, Dakota Electric does not have the ability to determine whether an application exists or whether a member is eligible for the RentHelpMN program. Absent a means of verifying an application for RentHelpMN, Dakota Electric is hesitant to support Minnesota Housing's request.

If you or your staff have any questions about these comments, please contact me at 651-463-6258 or aheinen@dakotaelectric.com.

Sincerely,

/s/ Adam J. Heinen

Adam J. Heinen
Vice President of Regulatory Services
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Certificate of Service

I, Melissa Cherney, 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 Nos. E,G-999/M-20-375

Dated this 10th day of September 2021

/s/ Melissa Cherney

Melissa Cherney