

January 21, 2026

Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 East Seventh Place, Suite 350  
St. Paul, MN 55101

RE: *In the Matter of a Possible Rulemaking to Amend Minnesota Rules, Chapter 7825*  
MPUC Docket No. E,G-999/R-26-81

Dear Ms. Bergman:

This letter is filed on behalf of the Joint Utilities,<sup>1</sup> in response to the Minnesota Public Utilities Commission's (Commission) January 9 Notice of Comment Period (Notice), in the above-referenced docket. The Notice requested comments on a Petition for Rulemaking (Petition) filed on January 7, 2026, by Utility Reform Now (URN), requesting the Commission initiate a rulemaking to either include in its rules certain policy statements issued by the Commission in 1982 or to adopt other rules governing rate cases for natural gas and electric utilities. Specifically, the Notice requested comments on whether the Commission should initiate such a rulemaking and whether there are other issues or concerns related to this matter the Commission should address.

The Joint Utilities do not recommend the Commission undertake a rulemaking proceeding to address the 1982 policy statements or to otherwise address natural gas or electric utility rate case filings at this time. Rulemaking proceedings can consume significant resources, adding to the regulatory burden of both the Commission and other stakeholders, including the Joint Utilities. In addition, given the volume and importance of the many regulatory matters currently before the Commission, the Joint Utilities are concerned that pursuing such a rulemaking would divert scarce resources from these existing matters. As the Joint Utilities are not aware of any current controversy regarding the substance of the 1982 policy statements, which have been generally followed for over 40 years, we do not currently see benefits to the regulatory process of a rulemaking that would justify this use of resources.

The Joint Utilities will review other parties' comments and provide our final recommendation on January 28, 2026, as provided for in the Notice.

This document has been filed with the eDocket system and served on the attached service list. Also enclosed is our Affidavit of Service.

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<sup>1</sup> The Joint Utilities consist of CenterPoint Energy, Dakota Electric Association, Minnesota Energy Resources Corporation, Minnesota Power, Otter Tail Power Company, and Xcel Energy

Thank you for the opportunity to provide these comments.

Very Truly Yours,

*/s/ Adam Heinen*  
Dakota Electric Association

*/s/ Amy Liberkowski*  
Xcel Energy

*/s/ Joylyn Hoffman Malueg*  
Minnesota Energy Resources Corporation

*/s/ Matthew Olsen*  
Otter Tail Power Company

*/s/ Jason Loos*  
CenterPoint Energy

*/s/ Jennifer Kuklenski*  
Minnesota Power

## AFFIDAVIT OF SERVICE

I, Christina Benning, certify that on Wednesday, January 21, 2026, I served the attached Filing of the Joint Utilities in Docket No. E,G-999/R-26-81 to all persons at the addresses indicated on the attached service list by having the document delivered via electronic filing or, if indicated on the attached service list, via U.S. Mail.

/s/ Christina Benning

Senior Regulatory Paralegal  
CenterPoint Energy

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jay	Anderson	jaya@cmpas.org	CMPAS		7550 Corporate Way Suite 100 Eden Prairie MN, 55344 United States	Electronic Service		No	R-26-81
2	Kevin	Berg	keberg@arvig.net	Hawley Public Utilities		PO Box 69 Hawley MN, 56549-0069 United States	Electronic Service		No	R-26-81
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	R-26-81
4	Jon	Brekke	jbrekke@greenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	R-26-81
5	B. Andrew	Brown	brown.andrew@dorsey.com	Dorsey & Whitney LLP		Suite 1500 50 South Sixth Street Minneapolis MN, 55402-1498 United States	Electronic Service		No	R-26-81
6	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	R-26-81
7	Daniel T	Carlisle	todd-wad@toddwadana.coop	Todd-Wadana Electric Cooperative		550 Ash Ave NE PO Box 431 Wadena MN, 56482 United States	Electronic Service		No	R-26-81
8	Jeremy	Carter	jcarter@ci.hutchinson.mn.us	Hutchinson Utilities Commission - Electric		225 Michigan St. SE Hutchinson MN, 55350-1940 United States	Electronic Service		No	R-26-81
9	Dennis	Chandler		City Of Two Harbors Municipal Gas		522 First Avenue Two Harbors MN, 55616 United States	Paper Service		No	R-26-81
10	Dave	Cluff	dcluff@aitkinutilities.com	Aitkin Public Utilities		120 First Street NW Aitkin MN, 56431 United States	Electronic Service		No	R-26-81
11	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department	445 Minnesota Street Suite 1400 St. Paul	Electronic Service		Yes	R-26-81

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					of Commerce	MN, 55101 United States				
12	Kristin	Dolan	kdolan@wildriceelectric.com	Wild Rice Electric Coop.		502 N Main PO Box 438 Mahnomen MN, 56557-0438 United States	Electronic Service		No	R-26-81
13	Randy	Eggert	utility@cityofkenyon.com	Kenyon Municipal Utilities		709 Second Street Kenyon MN, 55946 United States	Electronic Service		No	R-26-81
14	Mark	Erickson		City Of Lakefield		301 Main Street PO Box 1023 Lakefield MN, 56150-0900 United States	Paper Service		No	R-26-81
15	David	Evans	electricsupt@wadena.org	City of Wadena		1200 Sunnybrook Rd WADENA MN, 56482 United States	Electronic Service		No	R-26-81
16	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	R-26-81
17	Coleen	Gruis		Rushmore Electric Dept.		P.O. Box 227 136 N. Thopson Avenue Rushmore MN, 56168 United States	Paper Service		No	R-26-81
18	Amanda	Gucich	contact@nationwideregulatorycompliance.com	BCN Telecom, Inc.		1200 Mount Kemble Avenue 3rd Floor Morristown NJ, 07960 United States	Electronic Service		No	R-26-81
19	Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP		Suite 1750 220 South Sixth Street Minneapolis MN, 55402-1425 United States	Electronic Service		No	R-26-81
20	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	R-26-81
21	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583	Electronic Service		No	R-26-81

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
22	Kelly	Hovel	kh@gccea.com	Goodhue County Cooperative Electric		P.O. Box 99 Zumbrota MN, 55992-1091 United States	Electronic Service		No	R-26-81
23	Steven	Kahl	ndpsc@nd.gov	North Dakota Public Service Commission		600 E. Boulevard Avenue State Capital, 12th Floor, Dept 408 Bismarck ND, 58505-0480 United States	Electronic Service		No	R-26-81
24	Donna	Klay	adrian_admin@iw.net	City of Adrian/Adrian PUC		P.O. Box 190 209 Maine Avenue, Suite 106 Adrian MN, 56110 United States	Electronic Service		No	R-26-81
25	Don	Kleinschmidt	publicworks@mtniron.com	City Of Mountain Iron		8586 Enterprise Dr S Mountain Iron MN, 55768 United States	Electronic Service		No	R-26-81
26	Larry J.	Koshire	lkoshire@rpu.org	Rochester Public Utilities		4000 East River Road NE Rochester MN, 55906-2813 United States	Electronic Service		No	R-26-81
27	Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative		PO Box 626 31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	R-26-81
28	Bill aka WP	Lavin	bill.lavin@granitefalls.com	City of Granite Falls		641 Prentice Street Granite Falls MN, 56241-1598 United States	Electronic Service		No	R-26-81
29	Jon	Leerar	jleerar@heartlandpower.com	Heartland Power Cooperative		P.O. Box 70 Thompson IA, 50478 United States	Electronic Service		No	R-26-81
30	Eric L.	Lipman	eric@utilityreformnow.com	Utility Reform Now!		PO Box 25765 St. Paul MN, 55125 United States	Electronic Service		No	R-26-81
31	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA	Electronic Service		No	R-26-81

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						Minneapolis MN, 55401 United States				
32	Jerry	Mausbach	jerry@bppu.net	Blooming Prairie Public Utilities Commission		333 2nd Ave NE Blooming Prairie MN, 55917 United States	Electronic Service		No	R-26- 81
33	Dalene	Monsebroten	dalene.monsebroten@nmpagency.com	Northern Municipal Power Agency		123 2nd St W Thief River Falls MN, 56701 United States	Electronic Service		No	R-26- 81
34	Michael	Monsrud		Bagley Public Utilities		18 Main Ave. S. PO Box M Bagley MN, 56621 United States	Paper Service		No	R-26- 81
35	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	R-26- 81
36	Robert	Nelson	bademailnelson.calcity@acegroup.cc	City Of Caledonia Electric Utility		P.O. Box 232 231 East Main Street Caledonia MN, 55921 United States	Paper Service		No	R-26- 81
37	DeeAnne	Norris	dnorris@rscpa.coop	Renville- Sibley Cooperative Power Assn		103 Oak Street Box 68 Danube MN, 56230 United States	Electronic Service		No	R-26- 81
38	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	R-26- 81
39	Carol A.	Overland	overland@legalelectric.org	Legalelectric - Overland Law Office		1110 West Avenue Red Wing MN, 55066 United States	Electronic Service		No	R-26- 81
40	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101- 2131 United States	Electronic Service		Yes	R-26- 81
41	Rachel	Sorrentino	rachel@nwgas.com	Northwest Gas		801 Twelve Oaks Center Dr Ste 815B Wayzata MN, 55391	Electronic Service		No	R-26- 81

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
42	Tim	Stoner	timothy.stoner@belw.org	Blue Earth Light & Water Dept.		125 East Seventh Street Blue Earth MN, 56013 United States	Electronic Service		No	R-26-81
43	Adam	Swann	caledoniaclerk@acegroup.cc	City of Caledonia		231 E. Main St. P.O. Box 232 Caledonia MN, 55921 United States	Electronic Service		No	R-26-81
44	Tim	Thompson	tthompson@lrec.coop	Lake Region Electric Cooperative		PO Box 643 1401 South Broadway Pelican Rapids MN, 56572 United States	Electronic Service		No	R-26-81
45	Frank	Welter	fwelter@peoplesrec.com	People's Energy Cooperative		1775 Lake Shady Ave S Oronoco MN, 55960-2351 United States	Electronic Service		No	R-26-81
46	Ray H.	Wigern		Wells Public Utilities		101 First Street SE PO Box 96 Wells MN, 56097 United States	Paper Service		No	R-26-81