September 2, 2025

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

Subject: ***Dakota Electric Association Response to Supplemental Comments***

In the Matter of the Petition of Dakota Electric Association to Modify it Extension of Service Tariff
Docket No. E-111/M-25-178

Dear Mr. Bull:

Dakota Electric Association (Dakota Electric or Cooperative) submits these supplemental comments in an effort to clarify the record prior to the Minnesota Public Utilities Commission's (Commission) final decision on this matter by providing a response to the new recommendations made by the Office of the Attorney General-Residential Utilities Division (OAG); Citizens Utility Board of Minnesota (CUB); and CURE in their August 21, 2025 Supplemental Comments.[1] Dakota Electric would like to thank the parties for their analysis and recommendations; this review has provided additional

[1] The Department of Commerce, Division of Energy Resources (the Department) also filed Supplemental Comments on August 21, 2025, recommending approval of Dakota Electric's modifications to its original tariff proposal as submitted in Reply Comments. The Commission's August 8, 2025 Notice of Supplemental Comment Period only provided for one round of supplemental comments to be filed by August 21, 2025. Dakota Electric respectfully requests that the Commission accept these additional comments.

clarity to the proposal and raised important considerations for the Cooperative's other members.

This docket originated with Dakota Electric's March 31, 2025 Petition for approval of modifications to our extension of service tariff to establish a process to extend service to Extraordinarily Large Commercial and Industrial and System Intensive members. Importantly, the tariff modifications and process proposed in this proceeding do not address the rates that will be charged or the service characteristics of these loads—those specifics will be addressed through a separate filing if, and when, an Electric Service Agreement (ESA) is executed between Dakota Electric and a prospective load.

On July 29, 2025, the Cooperative filed Reply Comments which included additional information about the contribution in aid of construction (CIAC) payments in the tariff and recommended modified tariff language designed to address the concerns voiced by parties.

On August 21, 2025, the four parties provided discussion and recommendations on the Cooperative's overall proposal and revised tariff changes. The parties generally agreed that Dakota Electric's proposed tariff modifications in Reply Comments provide further explanation and clarification about how the tariff proposal will work and protect members but there remained some minor concerns. In the interest of a full record, and to aid in the Commission's final determination in this matter, the Cooperative briefly responds below to the new recommendations raised in supplemental comments.

First, both the OAG and CUB raised minor clarifying changes regarding member eligibility.[2] Dakota Electric reviewed the changes presented by both parties and these changes are similar and attempt to provide the same clarity to the proposed tariff language. After reviewing the proposed modifications, Dakota Electric agrees with the two parties that these minor modifications are appropriate and better clarify application of the tariff. The Cooperative recommends that the Commission accept the OAG's

[2] OAG Comments at Page 3 and CUB Comments at Pages 3-4.

proposed modifications because there are additional minor presentation changes (*i.e.,* paragraph breaks) that Dakota Electric also believes are appropriate. Dakota Electric incorporates this change, and other tariff changes discussed below, in a final proposed tariff attached to these comments.[3]

Second, in their comments, both the OAG and CUB expressed concern with the Cooperative's proposed treatment of the Letter of Authorization (LOA) and Engineering and Construction (E&C) Agreement. In our Reply Comments, Dakota Electric explained our initial rationale for treatment of these agreements. We also acknowledged the concerns of the parties and noted that we did not oppose formal approval of the agreements by the Commission and offered to provide notice of any substantive changes 30 days prior to enactment, which is analogous to the Commission's current handling of our Technical Specifications Manual (TSM). In supplemental comments, both parties agreed that providing substantive changes 30 days prior to implementation was appropriate, and CUB noted that formal approval in this docket and annual contract filings would mitigate their concerns regarding Commission oversight. The Cooperative appreciates the parties' further comments on this issue, and we do not oppose formal Commission approval of these contracts, the use of a 30-day negative checkoff process for any substantive changes, or an annual compliance filing with the current contract language.

Third, the OAG reiterated its concerns regarding costs associated with the acquisition of land, easements, or rights-of-way for facilities, equipment, or infrastructure to serve prospective load and recommended tariff language to address these concerns. The OAG also noted that the Cooperative failed to discuss this concern in its reply comments. Dakota Electric appreciates the additional discussion by the OAG and notes that we inadvertently did not address this topic in our reply comments. The Cooperative agrees that land and land acquisition costs have been significant issues in other dockets, and it is important that these are properly accounted for so that other members are not financially disadvantaged. The additional discussion by the OAG is

[3] DEA Attachment S-1.

illustrative, and Dakota Electric will include any land or land acquisition costs associated with distribution plant in its CIAC charged to a load subject to this tariff provision. Dakota Electric did not explicitly list land rights in its tariff language because these costs are a natural part of "electric facilities or infrastructure" because these facilities and infrastructure cannot be built without land rights. Although Dakota Electric does not believe additional changes to the tariff are necessary, we do not oppose the OAG's minor change and incorporate them into the final proposed tariff language that is attached to these comments.

Fourth, CUB continues to voice concerns with the Cooperative's position that we will exercise reasonable discretion to determine whether the "system intensive" classification applies to a load. CUB is concerned that this discretion may shift risk to other members and could be used by a load to argue against inclusion in a large load rate class. The cost shift concern raised by CUB appears centered around whether a load could become "system intensive" over time or after when an original determination occurs. As discussed further below, Dakota Electric proposes a minor tariff adjustment to address this concern. In addition, the types of consumers that may be subject to this provision are generally well known and Dakota Electric has existing CIAC and service extension protections built into our existing tariff. The Cooperative does not believe that the concerns voiced by CUB warrant additional tariff changes; however, we are firmly committed to ensuring that loads pay an appropriate amount for extension of service and that other members be protected from responsibility for such costs.

In terms of rate class assignment, the Cooperative believes it is our responsibility and expectation to place a consumer in the appropriate tariffed rate class. Dakota Electric has several Commission approved rates (*e.g.,* General Service, Commercial/Industrial Interruptible, Contracted Rate Service) that are applicable to these types of loads if they meet various required service attributes. The "system intensive" designation is *not* a screening tool for determining the appropriate rate class. That being said, the Cooperative agrees with CUB that memorializing this fact may be appropriate, and we do not oppose CUB's proposed language. Dakota Electric includes this language in the proposed tariff attached to these comments.

Extraordinary Large Commercial and Industrial and System Intensive Members

> Whether or not a member is extended service under this section will not predetermine which rate or rate class that member is assigned.

Fifth, CUB and CURE voiced concern about a circumstance where an existing member were to add significant load in the future or a "system intensive" load adds additional load. In particular, these two parties opined that the tariff provision would not apply to these future load modifications and that upgrade costs would be shifted to other members. Dakota Electric appreciates the parties raising this issue and notes that if significant future load were added, whether or not a load is associated with an existing member, that incremental load would be screened to determine if the additional load is considered "system intensive." From a planning perspective, Dakota Electric treats any load additions, regardless of a load's membership status, as a new load. After reviewing these concerns, the Cooperative believes a further minor modification to the proposed tariff is appropriate to ensure that it is clear that screening a load for whether they are "system intensive" is not dependent on their membership status. Dakota Electric proposes the following additional modification:

> Dakota Electric Association will provide electric service, to the extent capacity is available, to large commercial and industrial members requiring: 1) service delivery at a voltage other than the Association's regular and customary service of 12.5 kV and 2) system intensive members, in accordance with established applicable rates and charges or a Commission-approved Electric Service Agreement, when the anticipated revenue from the load ~~prospective member~~ justifies the expenditure.

Although minor, the Cooperative believes this modification addresses the concerns of CUB and CURE by removing the reference to prospective member.

Finally, the Cooperative wishes to address CUB's continued recommendation that Dakota Electric submit a large load tariff or electric service agreement that complies with Minn. Stat. § 216B.1622. As noted in our Reply Comments, Minn. Stat. § 216B.1622 only applies to public utilities; Dakota Electric is a rate-regulated electric distribution cooperative. Although the Cooperative understands, and shares, CUB's concerns, namely that all members are protected, their recommendation is not without costs, is premature, and does not acknowledge the fact that Dakota Electric has existing tariff provisions in place that can help mitigate these concerns. A separate large load tariff may be necessary if the number of loads reaches a certain threshold, but the Cooperative's existing Contract Rate Service, approved by the Commission in 2017, provides the Commission, and other members, with sufficient protections, including those noted by CUB, at this time.[4]

Conclusion

The Cooperative appreciates the parties' review of our petition in this matter, and we respectfully request that the Commission approve the modification to our Extension of Service tariff including the revisions and modification provided in our Reply Comments and in these supplemental comments. The Cooperative continues to believe the proposed tariff changes are necessary and prudent to protect existing members and create a fair and transparent review process for prospective large loads. Dakota Electric will continue to monitor developments associated with these types of loads and acknowledges that further tariff changes or process improvements may be necessary in the future.

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

[4] Docket No. E111/M-17-180.

Sincerely,

/s/ Adam J. Heinen

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Adam J. Heinen
Vice President of Regulatory Services
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024

Certificate of Service

I, Nicole McEathron, 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. E111/M-25-178

Dated this 2nd day of September 2025

/s/ Nicole McEathron

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Nicole McEathron

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MEMBER SERVICE INFORMATION
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Commercial and Industrial Members, Multi-Tenant Residential Facilities, and Seasonal Accounts

1. Dakota Electric Association will provide single-phase or three-phase electric service to commercial (including commercial developments) and industrial members and multi-tenant residential facilities in accordance with established applicable rates and charges when the anticipated revenue justifies the expenditure. Dakota Electric Association will install, own, and maintain the primary service to a point of connection designated as either a single-phase or three- phase transformer. An economic analysis will be made for any service that involves abnormally high investments, and/or those with low anticipated revenue. A contribution in the aid of construction will be required if the estimated investment is not justified by the anticipated revenue, calculated as follows for service provided under the applicable rate schedule:

		Sched. 31 Factor	Sched. 41 Factor	Sched. 46 Factors	Sched. 70/71 Factors
	Estimated Extension Costs				
-	Annual Sum of Monthly Non-Coincident Billing Demand (kW) times applicable rate schedule factor	NA	NA	$10.09	$10.61
-	Annual Sum of Monthly billed energy (kWh) times applicable rate schedule factor	NA	$0.15958	$0.03157	$.02529
-	Credit per Residential Unit times number of residential units in the complex	$1,282	NA	NA	NA
=	Required Contribution in Aid of Construction				

When underground service is requested, the member shall provide a right-of-way strip that is within four (4) inches, plus or minus, of the finished grade. The right-of-way must be free from obstructions and completely accessible to the Association's equipment.

The member shall furnish the pad for the padmounted transformer on underground systems in accordance with specifications provided by Dakota Electric Association.

The member will pay any additional installation costs incurred by the Association because of:

1. delays caused by member;
2. installation of underground facilities after ground is frozen;
3. soil conditions that impair the installation of underground facilities, such as rock formations;
4. paving of streets, alleys or other areas prior to the installation of the underground facility;
5. above-average permit costs; or
6. DNR crossing fees.

There may be situations where the member shall be required to install sections of conduit, such as underground entrance to a pad, which shall be at no cost to the Association.

The 2000 KVA distribution transformer is the largest size that Dakota Electric Association will install. Multiple transformers and service entrances will be required when service capacity requirements exceed 2000 KVA. The member cannot parallel multiple transformer services without written Dakota Electric approval of the design.

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE CONTINUED

~~The 2000 KVA distribution transformer is the largest size that Dakota Electric Association will install. Multiple transformers and service entrances will be required when service capacity requirements exceed 2000 KVA. The member cannot parallel multiple transformer services without written Dakota Electric approval of the design.~~

2. Irrigation Members
Dakota Electric Association will provide service to irrigation members in accordance with established applicable irrigation rates and in the "Agreement for Electric Service (Irrigation and Other Seasonal Loads). An economic analysis will be made for extensions to irrigation service. A contribution in aid of construction will be required if the estimated investment is not justified by the anticipated revenue.

The member shall furnish the pad for the padmounted transformer on underground systems in accordance with specifications provided by Dakota Electric Association.

3. Primary Metered Installations
Depending on the configuration of the Dakota Electric primary system, the member may have the option of installing primary metering on the 12.5kV system. Credits for primary service may be available as specified in applicable rate schedules. Many times this option is not available without the installation of additional 12.5kV facilities so as to allow for proper metering and so as not to negatively impact the reliability of other Dakota Electric member loads interconnected with the Dakota Electric distribution system.
    A. The member is responsible for all integration and installation costs for the primary metering system.
    B. The member is responsible for purchasing, owning and operating, all 12.5kV electrical facilities on the member's side of the primary metering installation(s). This includes responsibility for routine and emergency maintenance of those purchased primary facilities, which includes emergency transformer replacement and emergency primary facility repairs.
    C. Primary Metering is required for all primary wires feeding the facilities/complex.
    D. Dakota Electric, the National Electric Code, or both may require special protection for the member's primary system. The member is required to provide any necessary protection. This protection is required to be coordinated with the DEA distribution system's protection.

Extraordinary Large Commercial and Industrial and System Intensive Members

Whether or not a member is extended service under this section will not predetermine which rate or rate class that member is assigned.

Dakota Electric Association will provide electric service, to the extent capacity is available, to large commercial and industrial members requiring: 1) service delivery at a voltage other than the Association's regular and customary service of 12.5 kV and 2) system intensive members, in accordance with established applicable rates and charges or a Commission-approved Electric Service Agreement, when the anticipated revenue from the ~~prospective member~~load justifies the expenditure.

System intensive members are considered members served from Dakota Electric's 12.5 kV distribution system with service requirements that involve significant system modifications, design, and/or engineering to extend service to these members. The Association will exercise reasonable discretion, based on internal workflows and load characteristics, to determine what member is considered system intensive.

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Members requesting, or requiring, ~~this type of~~ service pursuant to 1) or 2) above will be screened through Dakota Electric's large load engineering project queue and will be required to execute the Association's Letter of Authorization and Engineering and Construction agreements to protect the financial interests of the Association and its other members. An economic analysis and an engineering analysis will be made for any member requesting ~~this type of~~ service pursuant to 1) or 2) above, and a contribution in aid of construction (CIAC) will be required for necessary distribution equipment and upgrades. The contribution in aid of construction and construction and energization requirements are detailed in the Association's Letter of Authorization and Engineering and ~~Construction Agreements~~Construction Agreements and within this section.

For members deemed subject to this section, the CIAC will represent the estimated total costs that the Association will incur to plan, design, procure, construct, and purchase electric facilities, infrastructure, ~~or~~ related equipment, or land rights associated with, and necessary, to serve this member. Association will track actual project costs as they are incurred and CIAC will be trued-up upon completion of the project.

For members deemed subject to this section, the CIAC shall be paid to the Association under the following schedule:

Payment No. 1 - 40% of estimated CIAC amount is due within thirty (30) business days of member's receipt of an invoice from Association, which will be issued promptly following full execution of the Engineering and Construction agreement.
Payment No. 2 - 30% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Association which will be issued when Dakota Electric Association completes utility substation design or system design and member completes circuit engineering design.
Payment No. 3 - 20% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Dakota Electric which will be issued approximately two (2) months prior to commencement of construction of the Association's distribution substation or system upgrades.
Payment No. 4 - 5% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Association which will be issued approximately two (2) months prior to delivery of power transformers to the project.
Payment No. 5 - 5% of estimated CIAC amount is due within twenty (20) business days of Customer's receipt of an invoice from Dakota Electric which will be issued when Association declares that the project's electrical infrastructure is ready for commissioning.

In the event that a member subject to this section delays for an extended period the design or construction of the project, Association may stop work and member shall reimburse Dakota Electric for all outstanding costs. In the event that a member subject to this section terminates the project prior to payment of all estimated CIAC, the member shall provide Dakota Electric reasonable notice of termination and compensate Association for all commercially reasonable and documented expenses, including outstanding CIAC payments for purchased equipment or infrastructure, incurred by or billed to Dakota Electric for work through the effective date of termination.

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE
SPECIAL FACILITIES

A. Definitions

1. Municipality is defined as any one of the following entities: a county, a city, a township or any other unit of local government.

2. City is defined as either a statutory city or home rule charter city consistent with Minn. Stat. sections 410.015 and 216B.02, subd. 9.

3. Special facilities are defined as non-standard facilities, non-standard design or non-standard location of facilities.

4. Special facilities are the type of services that results in costs in excess of the Association designated service installation. Common examples are duplicate service facilities, special switching equipment, special service voltage, three phase service where single phase service is adequate, excess capacity, underground installations to wood poles, conversion from overhead to underground service, specific area undergrounding, other special undergrounding, and relocation or replacement of existing Association facilities.

B. General Rule

When requested by the member, group of members, developer, or municipality to provide types of service that result in an expenditure in excess of the Association designated service installation the requesting member, group of members, developer, or municipality will be responsible for such excess expenditure. Common examples of these requests are duplicate service facilities, special switching equipment, special service voltage, three phase service where single phase service is adequate, excess capacity, capacity for intermittent equipment, trailer park distribution systems, underground installations to wood poles, conversion from overhead to underground, urban renewal undergrounding, other special undergrounding, and relocation or replacement of existing Association facilities.

C. Public Right-of-Way

1. Replacement, Modification or Relocation Due to Construction.

Whenever a governing body that manages a public right-of-way orders the Association to replace, modify or relocate its existing distribution facilities due to construction on said public right-of-way, such facilities will be relocated at Association expense, provided the construction is the most economical, industry accepted installation designated by the Association. If the governing body or municipality requests a type of construction with

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE
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(Continued)

costs in excess of the Association designated construction, such excess expenditures will be the responsibility of the municipality or the Association's members residing within the municipality. However, if the governing body issuing the order requiring construction on the public right-of-way does not pay the excess cost, the Association may seek Commission approval to recover such excess expenditures from the ratepayers residing in the governing body's territory.

2. Replacement, Modification or Relocation Due to Vacation of Public Right-of-Way.

Whenever a governing body of public right-of-way orders the Association to replace, modify or relocate its existing distribution facilities due to a vacation of a public right-of-way, the Association will be responsible for such expenditure. The Association may request that the governing body pay for the aforementioned expenditure. However, if the governing body chooses not to pay, the Association may seek approval from the Commission to recover this expenditure from the ratepayers residing in the governing body's territory.

D. Construction Requirements for Special Facilities

The Association will initially install special distribution facilities (which may include installation of standard facilities at a location/route deemed non-standard by the company) or the Association will replace, modify or relocate to an Association-approved location/route its existing distribution facilities upon a request of a member, group of members, developer, or upon order or request of a municipality. The benefited member, group of members, developer or municipality will be responsible for all costs in excess of standard installation for new facilities plus the value of the undepreciated life of existing facilities being removed minus the salvage value. However, if the municipality does not pay for the excess expenditure, the Association may seek Commission approval to recover such expenditure from the requesting municipality.

E. Underground Facilities Requirements

The following provisions apply when replacing overhead facilities with underground facilities:

1. The member, at their expense, must engage an electrician to adapt their electrical facilities to accept service from Association underground facilities.

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE
SPECIAL FACILITIES
(Continued)

2. The Association will allow reasonable time for the member to make the necessary alterations to their facilities, before removal of the existing overhead facilities.

3. Perpetual easements will be granted to Association at no cost to the Association whenever any portion of the underground distribution system is located on private land. Said private easements also will allow the Association access for inspection, maintenance, and repair of Association facilities.

4. The Association will have full access to its facilities installed underground for the purpose of inspection, maintenance, and repair of such facilities, such right of access to include the right to open streets and alleys.

5. When undergrounding is the result of a municipal project, the municipality will designate and reserve a definite area within the public ways for the installation and location of Association underground facilities. Once the Association facilities have been installed in such designated and reserved areas, if the municipality requires removal or relocation of such facilities for any reason, the municipality will reimburse the Association for the cost of such removal or relocation. However, if the municipality does not pay for the aforementioned expenditure, the Association may seek approval from the Commission to recover this expenditure from the ratepayers residing in the municipality's territory.

6. The municipality will give sufficient notice and will allow the Association sufficient time to place its facilities beneath public ways while the same are torn up for resurfacing. The municipality shall provide Association with access to the torn up public ways during such period so that Association will have unobstructed use of sufficiently large sections of the public ways to allow installation of the underground facilities in an economic manner.

7. Secondary voltage service supplied from an underground distribution lateral installation will require that the member install, own, and maintain necessary conduits and secondary service conductors or bus duct to a point designated by Association within or adjacent to the secondary compartment of the transformer or vault. Association will make final connection of member's secondary service conductors or bus duct to Association's facilities.

8. Secondary voltage service supplied from underground secondary service conductors may require that the member install, own, or maintain necessary conduits on private property to a point designated by the Association at or near the property line. The secondary service conductors usually will be installed by the member in his conduit,

MEMBER SERVICE INFORMATION
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(Continued)

However, in some installations it may be preferred to have Association provide a continuous installation from the Association facilities through the member conduit to his service equipment. In these installations the member must pay the total installed cost of the Association's cable installed on private property. The Association will make the final connection of member's secondary service connectors to Association's facilities.

F. Special Facilities Payments

The requesting party shall execute an agreement or service form pertaining to the installation, operation and maintenance, and payment of the facilities. Payments required will be made on a non-refundable basis and may be required in advance of construction unless other arrangements are agreed to in writing by the Association. The facilities installed by the Association shall be the property of the Association. Any payment by a member, group of members, developer or municipality shall not entitle him to any ownership interest or rights therein.

Payment for special facilities may be required by either, or a combination, of the following methods as prescribed by the Association: a single charge for the costs incurred or to be incurred by the Association due to such a special installation or a monthly charge being one-twelfth of Association's annual fixed costs necessary to provide such a special installation. The monthly charge will be discontinued if the special facilities are removed. When special distribution facilities are requested by a municipality and payment is not made by the municipality, the Association may seek approval from the Commission to recover its excess expenditure from the municipality's ratepayers.

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		Sched. 31 Factor	Sched. 41 Factor	Sched. 46 Factors	Sched. 70/71 Factors
	Estimated Extension Costs				
-	Annual Sum of Monthly Non-Coincident Billing Demand (kW) times applicable rate schedule factor	NA	NA	$10.09	$10.61
-	Annual Sum of Monthly billed energy (kWh) times applicable rate schedule factor	NA	$0.15958	$0.03157	$.02529
-	Credit per Residential Unit times number of residential units in the complex	$1,282	NA	NA	NA
=	Required Contribution in Aid of Construction				

When underground service is requested, the member shall provide a right-of-way strip that is within four (4) inches, plus or minus, of the finished grade. The right-of-way must be free from obstructions and completely accessible to the Association's equipment.

The member shall furnish the pad for the padmounted transformer on underground systems in accordance with specifications provided by Dakota Electric Association.

The member will pay any additional installation costs incurred by the Association because of:

1. delays caused by member;
2. installation of underground facilities after ground is frozen;
3. soil conditions that impair the installation of underground facilities, such as rock formations;
4. paving of streets, alleys or other areas prior to the installation of the underground facility;
5. above-average permit costs; or
6. DNR crossing fees.

There may be situations where the member shall be required to install sections of conduit, such as underground entrance to a pad, which shall be at no cost to the Association.

The 2000 KVA distribution transformer is the largest size that Dakota Electric Association will install. Multiple transformers and service entrances will be required when service capacity requirements exceed 2000 KVA. The member cannot parallel multiple transformer services without written Dakota Electric approval of the design.

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE CONTINUED

2. Irrigation Members
   Dakota Electric Association will provide service to irrigation members in accordance with established applicable irrigation rates and in the "Agreement for Electric Service (Irrigation and Other Seasonal Loads). An economic analysis will be made for extensions to irrigation service. A contribution in aid of construction will be required if the estimated investment is not justified by the anticipated revenue.

   The member shall furnish the pad for the padmounted transformer on underground systems in accordance with specifications provided by Dakota Electric Association.

3. Primary Metered Installations
   Depending on the configuration of the Dakota Electric primary system, the member may have the option of installing primary metering on the 12.5kV system. Credits for primary service may be available as specified in applicable rate schedules. Many times this option is not available without the installation of additional 12.5kV facilities so as to allow for proper metering and so as not to negatively impact the reliability of other Dakota Electric member loads interconnected with the Dakota Electric distribution system.
   A. The member is responsible for all integration and installation costs for the primary metering system.
   B. The member is responsible for purchasing, owning and operating, all 12.5kV electrical facilities on the member's side of the primary metering installation(s). This includes responsibility for routine and emergency maintenance of those purchased primary facilities, which includes emergency transformer replacement and emergency primary facility repairs.
   C. Primary Metering is required for all primary wires feeding the facilities/complex.
   D. Dakota Electric, the National Electric Code, or both may require special protection for the member's primary system. The member is required to provide any necessary protection. This protection is required to be coordinated with the DEA distribution system's protection.

<u>Extraordinary Large Commercial and Industrial and System Intensive Members</u>

Whether or not a member is extended service under this section will not predetermine which rate or rate class that member is assigned.

Dakota Electric Association will provide electric service, to the extent capacity is available, to large commercial and industrial members requiring: 1) service delivery at a voltage other than the Association's regular and customary service of 12.5 kV and 2) system intensive members, in accordance with established applicable rates and charges or a Commission-approved Electric Service Agreement, when the anticipated revenue from the load justifies the expenditure.

System intensive members are considered members served from Dakota Electric's 12.5 kV distribution system with service requirements that involve significant system modifications, design, and/or engineering to extend service to these members. The Association will exercise reasonable discretion, based on internal workflows and load characteristics, to determine what member is considered system intensive.

MEMBER SERVICE INFORMATION
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Members requesting, or requiring, service pursuant to 1) or 2) above will be screened through Dakota Electric's large load engineering project queue and will be required to execute the Association's Letter of Authorization and Engineering and Construction agreements to protect the financial interests of the Association and its other members. An economic analysis and an engineering analysis will be made for any member requesting service pursuant to 1) or 2) above, and a contribution in aid of construction (CIAC) will be required for necessary distribution equipment and upgrades. The contribution in aid of construction and construction and energization requirements are detailed in the Association's Letter of Authorization and Engineering and Construction Agreements and within this section.

For members deemed subject to this section, the CIAC will represent the estimated total costs that the Association will incur to plan, design, procure, construct, and purchase electric facilities, infrastructure, related equipment, or land rights associated with, and necessary, to serve this member. Association will track actual project costs as they are incurred and CIAC will be trued-up upon completion of the project.

For members deemed subject to this section, the CIAC shall be paid to the Association under the following schedule:

Payment No. 1 - 40% of estimated CIAC amount is due within thirty (30) business days of member's receipt of an invoice from Association, which will be issued promptly following full execution of the Engineering and Construction agreement.

Payment No. 2 - 30% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Association which will be issued when Dakota Electric Association completes utility substation design or system design and member completes circuit engineering design.

Payment No. 3 - 20% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Dakota Electric which will be issued approximately two (2) months prior to commencement of construction of the Association's distribution substation or system upgrades.

Payment No. 4 - 5% of estimated CIAC amount is due within twenty (20) business days of member's receipt of an invoice from Association which will be issued approximately two (2) months prior to delivery of power transformers to the project.

Payment No. 5 - 5% of estimated CIAC amount is due within twenty (20) business days of Customer's receipt of an invoice from Dakota Electric which will be issued when Association declares that the project's electrical infrastructure is ready for commissioning.

In the event that a member subject to this section delays for an extended period the design or construction of the project, Association may stop work and member shall reimburse Dakota Electric for all outstanding costs. In the event that a member subject to this section terminates the project prior to payment of all estimated CIAC, the member shall provide Dakota Electric reasonable notice of termination and compensate Association for all commercially reasonable and documented expenses, including outstanding CIAC payments for purchased equipment or infrastructure, incurred by or billed to Dakota Electric for work through the effective date of termination.

MEMBER SERVICE INFORMATION
EXTENSION OF SERVICE
SPECIAL FACILITIES

A. Definitions

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2. City is defined as either a statutory city or home rule charter city consistent with Minn. Stat. sections 410.015 and 216B.02, subd. 9.

3. Special facilities are defined as non-standard facilities, non-standard design or non-standard location of facilities.

4. Special facilities are the type of services that results in costs in excess of the Association designated service installation. Common examples are duplicate service facilities, special switching equipment, special service voltage, three phase service where single phase service is adequate, excess capacity, underground installations to wood poles, conversion from overhead to underground service, specific area undergrounding, other special undergrounding, and relocation or replacement of existing Association facilities.

B. General Rule

When requested by the member, group of members, developer, or municipality to provide types of service that result in an expenditure in excess of the Association designated service installation the requesting member, group of members, developer, or municipality will be responsible for such excess expenditure. Common examples of these requests are duplicate service facilities, special switching equipment, special service voltage, three phase service where single phase service is adequate, excess capacity, capacity for intermittent equipment, trailer park distribution systems, underground installations to wood poles, conversion from overhead to underground, urban renewal undergrounding, other special undergrounding, and relocation or replacement of existing Association facilities.

C. Public Right-of-Way

1. Replacement, Modification or Relocation Due to Construction.

Whenever a governing body that manages a public right-of-way orders the Association to replace, modify or relocate its existing distribution facilities due to construction on said public right-of-way, such facilities will be relocated at Association expense, provided the construction is the most economical, industry accepted installation designated by the Association. If the governing body or municipality requests a type of construction with

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costs in excess of the Association designated construction, such excess expenditures will be the responsibility of the municipality or the Association's members residing within the municipality. However, if the governing body issuing the order requiring construction on the public right-of-way does not pay the excess cost, the Association may seek Commission approval to recover such excess expenditures from the ratepayers residing in the governing body's territory.

2. Replacement, Modification or Relocation Due to Vacation of Public Right-of-Way.

Whenever a governing body of public right-of-way orders the Association to replace, modify or relocate its existing distribution facilities due to a vacation of a public right-of-way, the Association will be responsible for such expenditure. The Association may request that the governing body pay for the aforementioned expenditure. However, if the governing body chooses not to pay, the Association may seek approval from the Commission to recover this expenditure from the ratepayers residing in the governing body's territory.

D. Construction Requirements for Special Facilities

The Association will initially install special distribution facilities (which may include installation of standard facilities at a location/route deemed non-standard by the company) or the Association will replace, modify or relocate to an Association-approved location/route its existing distribution facilities upon a request of a member, group of members, developer, or upon order or request of a municipality. The benefited member, group of members, developer or municipality will be responsible for all costs in excess of standard installation for new facilities plus the value of the undepreciated life of existing facilities being removed minus the salvage value. However, if the municipality does not pay for the excess expenditure, the Association may seek Commission approval to recover such expenditure from the requesting municipality.

E. Underground Facilities Requirements

The following provisions apply when replacing overhead facilities with underground facilities:

1. The member, at their expense, must engage an electrician to adapt their electrical facilities to accept service from Association underground facilities.

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2. The Association will allow reasonable time for the member to make the necessary alterations to their facilities, before removal of the existing overhead facilities.

3. Perpetual easements will be granted to Association at no cost to the Association whenever any portion of the underground distribution system is located on private land. Said private easements also will allow the Association access for inspection, maintenance, and repair of Association facilities.

4. The Association will have full access to its facilities installed underground for the purpose of inspection, maintenance, and repair of such facilities, such right of access to include the right to open streets and alleys.

5. When undergrounding is the result of a municipal project, the municipality will designate and reserve a definite area within the public ways for the installation and location of Association underground facilities. Once the Association facilities have been installed in such designated and reserved areas, if the municipality requires removal or relocation of such facilities for any reason, the municipality will reimburse the Association for the cost of such removal or relocation. However, if the municipality does not pay for the aforementioned expenditure, the Association may seek approval from the Commission to recover this expenditure from the ratepayers residing in the municipality's territory.

6. The municipality will give sufficient notice and will allow the Association sufficient time to place its facilities beneath public ways while the same are torn up for resurfacing. The municipality shall provide Association with access to the torn up public ways during such period so that Association will have unobstructed use of sufficiently large sections of the public ways to allow installation of the underground facilities in an economic manner.

7. Secondary voltage service supplied from an underground distribution lateral installation will require that the member install, own, and maintain necessary conduits and secondary service conductors or bus duct to a point designated by Association within or adjacent to the secondary compartment of the transformer or vault. Association will make final connection of member's secondary service conductors or bus duct to Association's facilities.

8. Secondary voltage service supplied from underground secondary service conductors may require that the member install, own, or maintain necessary conduits on private property to a point designated by the Association at or near the property line. The secondary service conductors usually will be installed by the member in his conduit,

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However, in some installations it may be preferred to have Association provide a continuous installation from the Association facilities through the member conduit to his service equipment. In these installations the member must pay the total installed cost of the Association's cable installed on private property. The Association will make the final connection of member's secondary service connectors to Association's facilities.

F. Special Facilities Payments

The requesting party shall execute an agreement or service form pertaining to the installation, operation and maintenance, and payment of the facilities. Payments required will be made on a non-refundable basis and may be required in advance of construction unless other arrangements are agreed to in writing by the Association. The facilities installed by the Association shall be the property of the Association. Any payment by a member, group of members, developer or municipality shall not entitle him to any ownership interest or rights therein.

Payment for special facilities may be required by either, or a combination, of the following methods as prescribed by the Association: a single charge for the costs incurred or to be incurred by the Association due to such a special installation or a monthly charge being one-twelfth of Association's annual fixed costs necessary to provide such a special installation. The monthly charge will be discontinued if the special facilities are removed. When special distribution facilities are requested by a municipality and payment is not made by the municipality, the Association may seek approval from the Commission to recover its excess expenditure from the municipality's ratepayers.

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-178
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-178
3	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 25-178
4	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-178
5	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	Official 25-178
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-178
7	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	Official 25-178
8	Sarah	Mooradian	sarah@curemn.org	CURE		117 South 1st Street Montevideo MN, 56265 United States	Electronic Service		No	Official 25-178
9	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		No	Official 25-178
10	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-178