



December 31, 2025

Sasha Bergman, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101

**Re: In the Matter of the Petition of Dakota Electric Association to Modify its Member
Service Information Tariffs
Docket No. E-111/M-25-___**

Dear Ms. Bergman:

Dakota Electric Association (Dakota Electric or Cooperative) submits the attached Petition requesting approval from the Minnesota Public Utilities Commission to modify its member service information tariffs. As described in the attached Petition, the Cooperative proposes changes to its tariff to allow remote disconnection of service for nonpayment for all residential members. Dakota Electric also requests a variance to Minnesota Rules as part of this proposal. Dakota Electric also proposes changes to its tariff associated with its deposit and reconnection policies. These proposed changes address our obligation under the Settlement Agreement in our pending general rate case (Docket No. E111/GR-24-400) to work with parties on modifications to our policies regarding deposits and reconnections. Dakota Electric met with parties prior to making this filing and incorporated feedback into our proposal.

If you or your staff has any questions regarding Dakota Electric's Petition, please contact me at (651) 463-6258 or aheinen@dakotaelectric.com.

Sincerely,

/s/ Adam J. Heinen

Adam J. Heinen
Vice President of Regulatory
Services Dakota Electric Association
4300 220th Street West Farmington,
MN 55024
651-463-6258
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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Audrey Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF THE PETITION BY
DAKOTA ELECTRIC ASSOCIATION TO
MODIFY ITS SERVICE INFORMATION TARIFFS

DOCKET NO. E-111/M-25-____

SUMMARY OF PETITION TO MODIFY EXTENSION OF SERVICE TARIFF

On December 31, 2025, Dakota Electric Association (Dakota Electric or Cooperative) submitted a Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval to modify its Member Service Information Tariff. The proposed modifications are intended to allow Dakota Electric to fully utilize its advanced metering technology to remotely disconnect service for nonpayment for all residential members and to make modifications to the Cooperative's deposit and reconnection policies.

STATE OF MINNESOTA
BEFORE THE
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IN THE MATTER OF THE PETITION OF
DAKOTA ELECTRIC ASSOCIATION TO
MODIFY ITS MEMBER SERVICE INFORMATION TARIFFS

DOCKET NO. E-111/M-25-____

PETITION OF DAKOTA ELECTRIC ASSOCIATION

I. Introduction

Dakota Electric Association (Dakota Electric or Cooperative) submits this Petition to the Minnesota Public Utilities Commission (Commission) requesting approval to modify our Member Service Information Tariffs.

II. Filing Requirements

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. R. 7829.1300, Dakota Electric provides the following required general filing information.

1. Summary of Filing (Minn. R. 7829.1300, subp. 1)

A one-paragraph summary accompanies this Petition.

2. Service on Other Parties (Minn. R. 7829.1300, subp. 2)

Pursuant to Minn. Stat. § 216.17, subd. 3 and Minn. R. 7829.1300, subp. 2, Dakota Electric has electronically filed this Petition with the Commission and has served copies on the Minnesota Department of Commerce and the Office of Attorney General – Residential

Utilities Division. The attached summary of the filing prepared in accordance with Minn. R. 7829.1300, subp. 1 is being served on Dakota Electric's general service list.

3. Name, Address, and Telephone Number of Utility (Minn. R. 7829.1300, subp. 3(A))

Dakota Electric Association
4300 220th Street West
Farmington, MN 55024
(651) 463-6212

4. Name, Address, Electronic Address, and Telephone Number of Utility Attorney (Minn. R. 7829.1300, subp. 3(B))

Kristin Stastny
Taft Stettinius & Hollister LLP
2200 IDS Center
80 South 8th Street
Minneapolis, Minnesota 55402
kstastny@taftlaw.com
(612) 977-8656

5. Date of Filing and Date Proposed Rate Takes Effect (Minn. R. 7829.1300, subp. 3(C))

This Petition is being filed on December 31, 2025. Dakota Electric proposes that the revisions to the Member Service Information tariff will take effect upon Commission approval, but no sooner than March 31, 2026. The Cooperative does respectfully request that the Commission reach a decision on this request prior to May 1, 2026 so that Dakota Electric can have these processes in place prior to, or concurrent with, the end of the 2025-2026 Cold Weather Rule Period.

6. Statute Controlling Schedule for Processing the Filing (Minn. R. 7829.1300, subp.3(D))

No statute controls the schedule for processing this filing. Dakota Electric's filing falls within the definition of a "Miscellaneous Tariff Filing" under Minn. R. 7829.0100, subp. 11. Minn. R. 7829.1400, specifies that initial comments in response to a miscellaneous filing be filed within 30 days, with reply comments due within 10 days thereafter.

7. Utility Employee Responsible for Filing (Minn. R. 7829.1300, subp. 3(E))

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8. Reason for Filing and Impact on Rates and Services (Minn. R. 7829.1300, subp. 3(F))

The Petition modifies Dakota Electric's current member service information tariffs. These modifications involve two separate, yet related, parts of member service. The first modification involves how residential members are disconnected. Currently, except for a small number of known safety concerns, the Cooperative disconnects service for nonpayment after attempting a final site visit. The proposed modification will allow Dakota Electric to fully utilize its advanced metering technology and remotely disconnect service for nonpayment for all residential members. The second modification involves Dakota Electric's policies regarding deposits and reconnection of service. These modifications will lessen deposit requirements for nonpayment and create a protocol for temporary reconnection of service in the event of extreme heat and/or poor air quality. These proposed changes also address our obligation under the Settlement Agreement in our pending general rate case (Docket No. E111/GR-24-400) to work with parties on modifications to our policies regarding deposits and reconnections. Dakota Electric met with parties prior to making this filing and incorporated feedback into our proposal.

The additional information required under Minn. R. 7829.1300, subp. 3(F) is included throughout this Petition.

III. Petition

1. Background and Introduction

Dakota Electric provides electric service to approximately 117,000 accounts primarily in Dakota County but also in Goodhue, Rice, and Scott Counties. Of these accounts, approximately 92% are residential members. Beginning in 2020, Dakota Electric started the process of installing our Advanced Grid Infrastructure (AGi) meters, as approved by the Commission on May 8, 2018, in Docket No. E-111/M-17-821. AGi is the term Dakota Electric uses to refer to new technologies that enhance the communication and operation of our distribution system. These technologies are designed to help Dakota Electric monitor our distribution system for better efficiency and operational performance and allow us to have two-way communication to field equipment, providing numerous benefits to our members and Dakota Electric. One of these benefits includes the ability to remotely disconnect or reconnect service. In the short time since deploying our AGi meters, the Cooperative has realized efficiency improvements in the areas of operations and safety.

In 2022, Dakota Electric filed a petition with the Commission requesting a variance to Minnesota Rules, and a change to our tariff to allow the Cooperative to remotely disconnect members with a known safety concern.¹ On December 16, 2022, the Commission issued an Order approving the Cooperative's request and requiring annual reporting requirements. This remote disconnection process remains in place, and, to date, Dakota Electric has only remotely disconnected two members who have been classified as a known safety concern.

On December 30, 2024, Dakota Electric filed a general rate case.² On April 30, 2025, the Minnesota Department of Commerce (Department) and the Minnesota Office of the Attorney General, Residential Utilities Division (OAG) filed direct testimony. As part of its direct testimony, the OAG recommended that the Commission require Dakota

¹ Docket No. E111/M-22-494, Dakota Electric Initial Filing (September 6, 2022).

² Docket No. E111/GR-24-400.

Electric to change its policies regarding deposits for reconnection.³ On June 6, 2025, the parties in Dakota Electric's general rate case reached a settlement of all issues (Settlement Agreement).⁴ As part of the Settlement Agreement the parties reached the following agreement regarding deposits for reconnection:

For purposes of settlement, the Parties agree that Dakota Electric's proposed modification to its reconnection fee should be approved. The Parties further agree Dakota Electric will work with interested parties to develop modifications to its current policy requiring Residential members to pay a deposit in addition to the reconnection fee before reconnecting a member who has been disconnected for nonpayment. The Parties further agree that Dakota Electric will implement changes as soon as practicable including, if necessary, making a filing for approval with the Commission by February 26, 2026 to allow for Commission review and approval by May 1, 2026.

While the Commission orally approved the Settlement Agreement at its December 11, 2025 Agenda Meeting, a written order is still pending. In light of the parties' agreement to implement changes as soon as practicable, and the need for Commission review and approval to implement tariff modifications, Dakota Electric has engaged with interested parties regarding proposed modifications related to the Cooperative's collection of deposits for residential reconnections.

Although remote disconnection and deposits for reconnection are separate issues, the two topics are explicitly linked because they relate to the costs involved with disconnection and reconnection of service. Furthermore, these two issues overlap in Dakota Electric's Commission-approved service tariff. From an overall policy and administrative efficiency standpoint, the Cooperative believes addressing these issues in a coordinated manner is appropriate.

A. Deposit for Reconnection

As noted earlier in these comments, the parties in Dakota Electric's pending general rate case agreed that the Cooperative would work with interested parties on modifications to

³ Docket No. E111/GR-24-400, OAG April 30, 2025 Direct Testimony of Witness Chad Stevenson, Pages 97-101.

⁴ Docket No. E111/GR-24-400, June 6, 2025 Settlement Agreement.

our deposit policies. Dakota Electric's policies for service deposits and reconnection of service are detailed in Section VI, Sheets 12.1 through 15 of our tariff. The Cooperative conducted an historical review, and it appears that, apart from modifications to comply with Legislative changes, our Commission-approved service deposit tariff has been largely unchanged since Dakota Electric entered Commission rate regulation via a member referendum in the early 1980s. For reference, Dakota Electric's current policy, as outlined in our Commission-approved tariff, is that when a member is disconnected for non-payment, the Cooperative collects a deposit not to exceed an estimated two months' gross bill or existing two months' average bill where applicable.⁵ Our tariff also states that service will not be restored until all arrears are paid in full and the deposit is made or until other satisfactory credit arrangement is made.⁶

As noted above, in our pending general rate case, the OAG raised concerns regarding Dakota Electric's deposit requirements and policies for reconnection after disconnection for non-payment. In particular, the OAG expressed concern that this policy may be too onerous for some consumers and that other rate regulated utilities were not requiring service deposits for reconnection of service.⁷ As noted earlier in this Petition, as part of the Settlement Agreement, Dakota Electric agreed to work with interested parties to develop modifications to its current policy requiring Residential members to pay a deposit in addition to the reconnection fee before reconnecting a member who has been disconnected for nonpayment and that the Cooperative would implement these changes as soon as practicable. Dakota Electric met with the Department and OAG on November 7, 2025 to present our proposed tariff changes and to receive feedback from the parties. The Cooperative responded to requests for additional information and clarification and incorporated feedback from parties into our proposal. Dakota Electric appreciates the thorough review by parties, and we believe the recommended changes provide for a more complete tariff change proposal.

Dakota Electric acknowledges that this is a complex topic and as a not-for-profit distribution cooperative, we do not have shareholders and must balance the interests of

⁵ Dakota Electric Tariff, Section VI, Sheet 15.

⁶ Dakota Electric Tariff, Section VI, Sheet 13.1.

⁷ Docket No. E111/GR-24-400, OAG April 30, 2025 Direct Testimony of Witness Chad Stevenson, Pages 97-101.

our entire membership. Clearly, members who are having difficulty paying their bills, including those who are disconnected for non-payment, have interests that Dakota Electric must consider; however, unpaid balances also place pressure on bad debt and write-offs which increase rates for all members. Dakota Electric sees disconnection for non-payment as a last resort and deploys multiple strategies to minimize this outcome. We are optimistic that the changes discussed below will help lessen the financial burden for members who have been disconnected for nonpayment and offer options for members to remain current or find options to handle past due accounts.

Below, the Cooperative presents the proposed changes to its service disconnection, reconnection, and service deposit policies and tariffs, which are intended to balance the interests of all members. The formal language changes are discussed in Section B.2 of these comments and in Attachments A and B. The Cooperative's proposal below is based on disconnection events during a 12-month period.⁸ The proposed process is as follows:

1. First disconnection: The disconnected member will not be assessed a service deposit as a condition for reconnection. The member will be responsible for the Commission approved reconnection fee and any outstanding delinquent balance. To pay the outstanding balance, Dakota Electric will offer the member a payment plan that is agreeable to parties and takes into account the member's financial condition and any extenuating circumstances of the household, as noted in Minnesota Statute § 216B.098. For the avoidance of doubt, a member may agree to pay the full outstanding balance without a payment plan if the member chooses.
2. Second disconnection: The disconnected member will be assessed a service deposit up to two months' average bill, which can be rolled into the member's payment plan, if applicable. The member will be responsible for the Commission approved reconnection fee and any outstanding delinquent balance. To pay the outstanding balance and service deposit, Dakota Electric will offer a payment plan

⁸ At the time this Petition was filed, Dakota Electric anticipates the 12-month period running from May 1 to April 30. This period coincides with the annual end of the Cold Weather Rule period.

that is agreeable to parties and takes into account the member's financial conditions and any extenuating circumstances of the household, as noted in Minnesota Statute § 216B.098. For the avoidance of doubt, a member may agree to pay the full outstanding balance without a payment plan if the member chooses.

3. Subsequent disconnections: Any unpaid amount of the deposit in part 2 will be due upfront and not eligible for inclusion in the member's payment plan. The member will be responsible for the Commission approved reconnection fee and any outstanding delinquent balance. To pay the outstanding balance, Dakota Electric may offer a payment plan that is agreeable to parties and takes into account the member's financial conditions and any extenuating circumstances of the household, as noted in Minnesota Statute § 216B.098. For the avoidance of doubt, a member may agree to pay the full outstanding balance without a payment plan if the member chooses.

Dakota Electric believes these changes to our reconnection and service deposit policies and associated tariffs represent the appropriate balance between helping lessen the burden for members experiencing difficulty paying their electric bills and rate impacts to the greater membership. The Cooperative further clarifies that this process would apply to those disconnected from service for less than 90 days. In our experience, accounts that remain disconnected for non-payment more than 90 days are generally consumers who have moved off our lines. In this case, if the consumer returns to the Dakota Electric system, they may be required to make a deposit equal to two months' average estimated electric bills.⁹

B. Remote Disconnection of Service

Since the Commission first approved Dakota Electric's limited variance request in Docket No. E111/M-22-494 in 2022, allowing remote disconnections without an in-person

⁹ Dakota Electric Tariff, Section VI, Sheet 15.

contact from an employee when there is a known safety concern at the residence, safety-related issues have continued to exist, and in some respects, have been amplified.¹⁰ Beyond several well-known instances of violence in the last twelve months, Dakota Electric has experienced actual circumstances that have resulted in safety risks to our employees. Earlier in 2025, while disconnecting service one of our employees was bitten on the hand by a member's dog. Luckily, the member was able to gain control of the dog, the bite was minor, and our employee was not seriously injured; however, it was an OSHA reportable incident. In addition, the Cooperative also continues to deal with a small number of so-called sovereign citizens on our system. These members hold unorthodox political beliefs and tend to respond negatively or erratically to interactions with Dakota Electric and our staff. Although Dakota Electric has not experienced violent or unsafe interactions with these members to date, there have been recent violent interactions between sovereign citizens and authorities in other locations.¹¹

The Cooperative realizes this request represents a significant potential impact to our members, especially those who may be struggling financially. However, Dakota Electric management, and our Board of Directors, have determined that the physical risks to our employees and the general public have become too great to continue the personal contact requirement in Minnesota Rule 7820.0500 before disconnection can occur for non-payment. The Cooperative is acutely aware of the potential impact to members this may have, which is why, in conjunction with this request, we are also recommending adjustments to our disconnection and reconnection tariffs (discussed earlier in these comments).

Dakota Electric is not the only regulated utility in the state with some level of approved remote disconnection. Xcel Energy has had a variance in place to allow remote disconnection, without a site visit by an Xcel Energy employee, for the majority of its customers since 2023. Remote disconnection is allowed if Xcel Energy makes contact, which is defined as reaching a customer via a final phone call or leaving a voicemail, with the customer prior to a disconnection notice. This variance and the requirements

¹⁰ <https://bringmethenews.com/minnesota-news/police-ramsey-county-man-arrested-after-threatening-utility-worker-with-gun>.

¹¹ <https://www.bbc.com/news/articles/cr4e9ddwd5ro>.

associated with the disconnection of service were further modified and clarified in a recent Commission Order.¹² The Cooperative has reviewed the Xcel Energy variance and reviewed their Commission-approved requirements and analyzed whether they are applicable to Dakota Electric and our internal systems and business structure. Overall, based on this review, Dakota Electric is likely able to accommodate similar requirements but there are some modifications or adjustments that are necessary to better fit our operating realities.

As noted above, Xcel Energy is allowed to remotely disconnect service if it is able to make contact with a customer. In an instance where Xcel Energy does not make contact, they are still required to make a site visit. Xcel Energy estimated that it still makes site visits for approximately 7% of its customers that are disconnected for non-payment.¹³ Although, by the nature of volume, this reduces the safety risks for Xcel Energy, it does not eliminate these concerns for Xcel Energy, and this would also be true for Dakota Electric. If the Cooperative experienced a similar 7% rate, it would still represent approximately 200 final contact visits by Dakota Electric staff each year. The Cooperative does not believe that a similar requirement is appropriate because it does not eliminate the ongoing safety concerns for our employees and the general public.

As a condition of Xcel Energy's variance, they are also required to forego disconnections during periods of extreme heat and when the Air Quality Index (AQI) is greater than 150. If ordered by the Commission, Dakota Electric will be able to accommodate these restrictions on disconnections. Dakota Electric notes that we are fully compliant with Minnesota Statutes §§216B.0975 and 216B.096 and already forego disconnections during periods of extreme heat and do not disconnect members on Fridays. As discussed in the Xcel Energy proceeding, no specific definition or threshold exists for when a "high" AQI occurs. Through our analysis and review of internal systems, we agree with Xcel Energy that an AQI above 150 is a reasonable proxy for a "high" AQI. Currently, the Minnesota Pollution Control Agency (MPCA) provides Air Quality alerts when the AQI is above 100. In an effort to better understand these alerts and notifications, the Cooperative discussed this matter with the MPCA, and they explained

¹² July 25, 2025 Order in Docket No. E002/M-25-27.

¹³ May 14, 2025 Evaluation Metrics Discussion Summary, Docket Nos. E002/M-25-27 and E002/M-22-233.

that the MPCA provides more detailed notification at the county level for the AQI above 150 threshold. Dakota Electric believes it will be able to use this information and notifications to determine whether air quality has crossed a threshold where disconnections are suspended.

There was also significant discussion in Xcel Energy's 2025 service quality docket regarding reconnection of service during extreme heat and periods of poor air quality.¹⁴ The Commission addressed these issues in its July 25, 2025 Order in Xcel Energy's Service Quality Docket and, going forward, when these events happen, Xcel Energy will be required to reconnect customers who have been disconnected for non-payment for the duration of the extreme heat or poor air quality event. As part of the discussion on the issue, Xcel Energy noted potential safety considerations associated with remotely reconnecting customers and complications associated with when reconnection should occur, how long should they last, and then the process for disconnecting service again at the conclusion of the event. The Commission's Order for Xcel Energy required them to consult with the MPCA and the Minnesota Department of Health (MDH) about this topic and other issues.¹⁵ In light of this requirement, the Cooperative reached out to these agencies and met with the agencies on October 27, 2025 to discuss our proposal. During this meeting, Dakota Electric explained that our current expectation would be to suspend disconnections and temporarily reconnect members when poor air quality (AQI above 150) is expected to persist for 24 hours or longer or for the duration of an extreme heat event. The agencies were generally supportive of the Cooperative's proposal and noted that mechanisms (*e.g.*, air quality forecasts) are currently in place to help facilitate this approach.

The reconnection requirements applicable to Xcel Energy are important from a consumer protection standpoint but pose significant operational challenges. However, if ordered by the Commission, we need to ensure that our internal systems can facilitate the types of requirements discussed above so that remote reconnections can be achieved in a safe and efficient manner. The Cooperative reviewed systems and resources across the organization and determined that safe, and efficient, temporary reconnection is

¹⁴ Docket No. E002/M-25-27.

¹⁵ July 25, 2025 Order, Docket No. E002/M-25-27, Pages 1-2.

possible with current internal systems. In terms of temporary reconnections, Dakota Electric looked at historical information, and we typically have less than 150 members who are disconnected for non-payment at any given time. Through a combination of systems, it appears that the Cooperative can simultaneously reconnect a group of members. Reconnection of service, especially for a temporary amount of time, and to a location that may have been out of service for an extended period, has certain safety risks that can complicate the process and need to be mitigated. For example, if a member has been disconnected for an extended period, there may be a situation where the member has inadvertently created a fire hazard (*e.g.*, items placed on stove). If service is reconnected without notice, a fire may start or, if sensitive electronics are plugged in and service suddenly begins, there could be damage to the electronics. Currently, when Dakota Electric begins reconnection, we advise the member to make sure that all electronics are in the off position and then we ask for their permission to reconnect service. Dakota Electric expects a similar process before we can safely reconnect service remotely in response to high AQI or extreme heat.

Potential administrative costs and efficiencies is another area that we considered as part of our review of whether reconnection during weather or poor air quality events was practicable. Dakota Electric reviewed Xcel Energy's customer notification requirements,¹⁶ and we believe that similar notifications are achievable with our current, and planned, resources, and allow for efficient use of limited internal labor resources. The Cooperative is in the process of implementing an updated billing and customer information system (CIS) and this new system will be able to facilitate a preferred notification method. Dakota Electric also believes that the safety precaution requirements for Xcel Energy are generally appropriate.¹⁷ Based on our understanding of these requirements, reconnection does not occur unless the disconnected customer affirmatively acknowledges safety precautions. In light of the safety concerns associated with reconnection, the Cooperative believes acknowledgment and confirmation by the disconnected member is necessary, and we believe that reconnection (even in the case of extreme weather or poor air quality) without confirmation is inappropriate and

¹⁶ July 25, 2025 Order, Docket No. E002/M-25-27, Ordering Point No. 10.

¹⁷ July 25, 2025 Order, Docket No. E002/M-25-27, Ordering Point No. 8.

represents undue safety concerns for members and the general public and is an operational risk for Dakota Electric. If these changes are approved, the Cooperative will update all our disconnection-related materials, including our new member packet and internal staff training to reflect this new process.

As part of our currently approved limited variance, the Commission approved an additional layer of notice for members that are a known safety concern. This additional notice layer requires Dakota Electric to send the member a final communication via certified mail. This process works in a limited situation such as what we have currently but expanding remote disconnection to all members does not make continued, or expanded, use of certified mail practical from a staffing or cost perspective. Sending certified mail requires a Dakota Electric staff member to make an in-person visit to the local post office; we are unavailable to make this type of mailing from our offices. Year-to-date, the Cooperative has sent 45,448 disconnection notices.¹⁸ Even assuming that 10% of these notices translated into the need for a second, final notice, that represents an administratively burdensome number of certified mailings. The proposed tariff changes are discussed in greater detail below.

2. Tariff Provisions

Dakota Electric requests Commission approval to modify our Member Service Information Tariff (Sheets 13.1 and 15 of Section VI are included as Attachments A and B) to modify and revise our policies regarding disconnection for non-payment, reconnection of service, and procedures regarding service deposits associated with reconnection of service. Key modifications to these tariffs are as follows:

- A. Sheet 13.1: Notice of Disconnection: Tariff changes clarify and describe the Cooperative's process associated with notice of disconnection. Tariff change also removes known safety concern language because these provisions are unnecessary if all members are remotely disconnected for non-payment.

¹⁸ December 17, 2025, Dakota Electric November Cold Weather Rule Report, in Docket No. E,G999/PR-25-2.

- B. Sheet 13.1: Reconnection of Service: Tariff changes that reflect updated processes around reconnection of service. These changes include updates about how payment is accepted and when service deposits are applicable.
- C. Sheet 15: Member Service Information, Deposits: Tariff changes that reflect the updated deposit policy discussed in Section III.1.A of this Petition.

Dakota Electric notes that in our pending general rate case,¹⁹ we proposed modifications to some of the pages listed above. If the modifications proposed in this filing are approved prior to the implementation of final rates in the pending general rate case, Dakota Electric is prepared to make any necessary filings in the rate case as required by the Commission to memorialize these other changes. In addition, for the sake of clarity, the Cooperative also provides clean and redlined tariffs based on the current tariff (Attachment A) and proposed tariff language in the pending rate case (Attachment B).

4. Variance Request

Minnesota Rule 7820.2500 states the following:

Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer.

Currently, Dakota Electric complies with Minnesota Rule 7820.2500 and has been attempting to make personal contact with the member at the address where service is

¹⁹ *In the Matter of the Application of Dakota Electric Association for Authority to Increase Rate for Electric Service in Minnesota*, Docket No. E111/GR-24-400, Application for Authority to Increase Electric Rates at Exhibit __ (DEA-18), Exhibit __ (DEA-19) and Workpaper No. 27 (Dec. 30, 2024).

rendered, unless the member is considered a known safety concern. If we are unable to make contact, or the member does not render payment, Dakota Electric disconnects service remotely from the vehicle, on site, using our AGi software. This process makes reconnection of service easier, and it is also safer for our employees than physical meter disconnection, which was required prior to deployment of AGi meters. Despite these improvements, the requirement to attempt contact at the service address still creates significant risk for our field employees. As discussed above, Dakota Electric concludes that the safety of our employees is unnecessarily at risk by continued compliance with the requirement of Minn. Rule 7820.2500 for personal contact.

Since Minnesota Rule 7820.2500 requires personal contact with members at a service address, Dakota Electric's proposal requires a variance to Minnesota Rules. The Commission's requirements for granting a rule variance are specified in Minnesota Rule 7829.3200. Minnesota Rule 7829.3200 allows the Commission to grant a variance to its rules when it determines that the following requirements are met:

- A. enforcement of the rule would impose an excessive burden upon the applicant or other affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. granting the variance would not conflict with standards imposed by law.

The rule also notes that unless the Commission orders otherwise, variances automatically expire in one year.

- A. Enforcement of the rule would impose an excessive burden upon the applicant or other affected by the rule.*

Minnesota Rule 7820.2500 requires Dakota Electric to attempt personal contact, under any circumstance, even when there is a known risk to the safety of our employees, law enforcement, and the general public (except for the limited variance to this Rule as approved by the Commission in December 2022). As described above, Dakota Electric's AGi metering allows for remote disconnection, which provides a safe, effective, and efficient way to mitigate known and continuing safety risks. Furthermore, the proposed

changes to our service deposits and disconnection service tariffs, and communication of potential disconnection for non-payment to our members, as discussed earlier in these comments, seek to mitigate negative impacts to our membership. For these reasons, Dakota Electric concludes that continued enforcement of Minnesota Rule 7820.2500 represents an excessive burden.

B. Granting the variance would not adversely affect the public interest.

The public interest is not adversely affected by granting this variance because Dakota Electric proposes modifications to how it communicates disconnection for non-payment and requirements for reconnection of service when disconnection for non-payment occurs. Given these proposed modifications, and the reduced risk to our employees and the general public, Dakota Electric believes this request is in the public interest, especially when considering the consumer protections discussed earlier in these comments.

C. Granting the variance would not conflict with standards imposed by law.

Dakota Electric is unaware of any conflict with any standards imposed by law. The Commission's rules permit variances under circumstances such as those presented in this petition, and the Commission has already granted Xcel Energy a similar request. Given the ability of our AGi meters to allow remote disconnection, and the employee and public safety concerns associated with our request, the Commission approving our variance request from Minnesota Rule 7820.2500 is in the public interest.

As noted earlier in this section, the rule allows for the variance to expire automatically after one year unless ordered by the Commission. The Cooperative notes that if this variance is approved, it will result in significant changes to our internal operations, which may make a one-year variance, subject to future extension, administratively burdensome. That being said, Dakota Electric is also aware that the Commission has been reluctant to grant indefinite or longer variances in an initial variance request. As such, the Cooperative does not request a longer variance at this time and intends to file a compliance after the first disconnection season detailing the

outcomes of this variance. Absent negative findings in this compliance, Dakota Electric envisions requesting a longer or an indefinite variance at that time.

IV. Conclusion

Based on the information contained in this filing, Dakota Electric respectfully requests that the Commission approve the modifications to our member service information tariff. The proposed modifications will allow Dakota Electric to fully utilize our advanced metering technology to remotely disconnect service for nonpayment for all residential members and protect the safety of our employees and the general public. The proposed modifications will also make adjustments to the Cooperative's deposit and reconnection policies in a manner that lessens deposit requirements for nonpayment and creates a protocol for temporary reconnection of service in the event of extreme heat and/or poor air quality.

Dated: December 31, 2025

Respectfully Submitted,

/s/ Adam J. Heinen

Adam J. Heinen
Vice President of Regulatory Services
Dakota Electric Association

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. E-111/M-25-____

Dated this 31st day of December 2025

/s/ Nicole McEathron

Nicole McEathron

DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 13.1
REVISION: 910

MEMBER SERVICE INFORMATION DISCONNECTION OF SERVICE

Notice of Disconnection

Dakota Electric Association shall send notices to disconnect service by first class mail. A specific date will be given for the time when a payment must be received or service may be disconnected.

If Dakota Electric Association is not contacted by the consumer, at least one attempt will be made to contact the consumer by telephone and/or member's preferred contact method. If no contact is made, ~~an Association employee will make a final attempt to contact the consumer at the place of service, and if no contact is made,~~ or if contact is made but no payment agreement can be reached, service may be disconnected. Service will be disconnected remotely unless remote disconnection is not technically feasible, member has opted out of AGi metering, or represents a safety or operational concern. ~~In the event of a known safety concern, Dakota Electric Association will not make a final attempt to contact the consumer at the place of service. Dakota Electric Association will, in lieu of contact at the place of service, send an additional notice to disconnect service by certified mail if unable to make earlier contact. A specific date will be given for the time when a payment must be received or service may be remotely disconnected. For the purposes of this tariff section, known safety concern is defined as a place of service that requires a police escort, has a potential problem dog, or permission from member to enter the place of service is required.~~

Reconnection of Service

In the event that service has been disconnected because of nonpayment of the electric bill, service charges, based on the cost to restore service will be assessed before service is restored. This cost will necessarily be higher during an overtime period.

If service has been disconnected, payment must be in the office before the order will be given to restore service. Cash or money order may be required at any time. Dakota Electric will not restore service until all arrears are paid in full or a satisfactory payment arrangement is agreed to between member and Association for the repayment of outstanding arrears. Dakota Electric may also require a deposit as part of the requirements to reconnect service. ~~This and a~~ deposit is may be made by cash, credit card, or money order according to the Association's deposit requirements, or until other satisfactory credit arrangement is made.

~~In the event of forecasted extreme heat, as defined in Minnesota Statute 216B.0975, and/or Air Quality Index (AQI) above 150 for longer than 24 hours, the Association will temporarily reconnect members disconnected for nonpayment over the duration of the event if member affirmatively responds to contact from the Association. Temporary reconnection is not available to members who have opted out of AGi metering. During this period of reconnection, member will be responsible for electrical consumption and Dakota Electric will make all reasonable efforts to communicate consumer protections, assistance programs, and payment arrangements to member. Prior to conclusion of event, Association will notify member of the time when service will be remotely disconnected. In the event the order has been issued to disconnect service, and the collector arrives at the premises, he/she must accept cash, credit card, or money order payment of the delinquent bill. This payment will avoid the necessity of terminating service.~~

Notice to Government Bodies of Utility Disconnection

Upon written request from a statutory or home rule charter city, of the Department, and consistent with Minnesota Statute 216B.0976, the Cooperative will provide reports of currently disconnected properties or newly disconnected properties for consumers located within the city's boundaries, if requested by a statutory or home rule charter city, or Cooperative service territory, if requested by the Department.

DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 15
REVISION: 43

MEMBER SERVICE INFORMATION DEPOSITS

Dakota Electric Association may collect a deposit if service has been disconnected for nonpayment. Absent extenuating circumstances (e.g., meter tampering, theft, bankruptcy), the Association will not impose deposit requirements on the first instance of disconnection during a 12-month period. For subsequent disconnections for nonpayment, and extenuating circumstances, the Association may ~~It will be the policy of Dakota Electric Association to~~ collect a deposit not to exceed an estimated two months' gross bill or existing two months' average bill. In the case of deposits for nonpayment, the deposit may be rolled into the payment arrangement for the first instance a deposit is required during the 12-month period. For all subsequent disconnections for nonpayment during the 12-month period, the deposit must be made in full, where applicable if the service has been terminated because of nonpayment or when a bankruptcy is filed. Any existing deposit must be applied to the delinquent bill, and then the new deposit will be assessed and must be paid (or agreement made for payment through a payment arrangement) prior to the time the service is restored.

When a member returns to Dakota Electric Association after leaving, or being disconnected for longer than 90 days, with an unpaid balance, ~~or~~ other credit problems, or past extenuating circumstances, a deposit equal to two average months' electric bills of the most recent occupant at that address may be assessed. This deposit is in addition to payment in full for the previously unpaid balance or mutually agreed upon payment plan.

Dakota Electric shall not require a deposit for a new member with no prior service from the Association unless the credit history of the new member demonstrates that payment cannot be assured. The determination of the new member's credit history shall be made only by credit reports reflecting the purchase of utility service, unless permission in writing is received from the new member to use other credit reports, and such reports are mailed to the new member. Refusal of a new member to permit use of a credit rating or credit service, other than that of a utility, shall not affect the Association's determination of that new member's credit history. Satisfactory credit shall be 12 consecutive months of on-time payments with no remaining unpaid balance.

If a member has maintained a good payment record for one year, the deposit will be refunded. A good payment record is defined as payment of the electric bill within 25 days of the due date each of the preceding 12 months.

Deposits shall earn interest at an annual rate as specified by Minnesota Statute 325E.02. This interest will be credited to the electric bill printed in December or will be credited to the final bill, whichever occurs first.

Deposits, plus interest, will be applied to the final bill, and any credit balance remaining will be refunded within forty-five (45) days from the date service is terminated.

Dakota Electric shall not require a deposit of any member without explaining in writing why that deposit or guarantee is required.

DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 13.1
REVISION: 10

MEMBER SERVICE INFORMATION DISCONNECTION OF SERVICE

Notice of Disconnection

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Reconnection of Service

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DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 15
REVISION: 4

MEMBER SERVICE INFORMATION DEPOSITS

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DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 13.1
REVISION: ~~1011~~

MEMBER SERVICE INFORMATION DISCONNECTION OF SERVICE

Notice of Disconnection

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DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 15
REVISION: 45

MEMBER SERVICE INFORMATION DEPOSITS

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DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 13.1
REVISION: 11

MEMBER SERVICE INFORMATION DISCONNECTION OF SERVICE

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DAKOTA ELECTRIC ASSOCIATION
4300 220th Street West
Farmington, MN 55024

SECTION: VI
SHEET: 15
REVISION: 5

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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	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	Dakota Electric Association General Service List
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Dakota Electric Association General Service List
3	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	Dakota Electric Association General Service List
4	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Dakota Electric Association General Service List
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	Dakota Electric Association General Service List
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Dakota Electric Association General Service List
7	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	Dakota Electric Association General Service List
8	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	Dakota Electric Association General Service List
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		Yes	Dakota Electric Association General Service List