



Your Touchstone Energy® Cooperative 

November 23, 2021

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

**Re: Dakota Electric Association
Request for Variance – Billing Error Rules
Docket No. E-111/M-21-___**

Dear Mr. Seuffert:

Dakota Electric Association® (Dakota Electric or Cooperative) submits the attached Petition requesting approval of a variance to the Minnesota Public Utilities Commission (Commission or MPUC) Billing Error Rules, Minnesota Rule 7820.3800.

If you or your staff have any questions regarding Dakota Electric's variance petition, please contact me any time at (651) 463-6258.

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
aheinen@dakotaelectric.com

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A
DAKOTA ELECTRIC ASSOCIATION
PETITION FOR VARIANCE – BILLING ERROR RULES

DOCKET NO. E-111/M-21- ____

SUMMARY

On November 23, 2021, Dakota Electric Association[®] (Dakota Electric or Cooperative) submitted a Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval of a variance to Minnesota Rule 7820.3800 regarding Billing Errors.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph P. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF A
DAKOTA ELECTRIC ASSOCIATION
PETITION FOR VARIANCE – BILLING ERROR RULES

DOCKET NO. E-111/M-21- ____

PETITION OF DAKOTA ELECTRIC ASSOCIATION

I. Introduction

Dakota Electric Association[®] (Dakota Electric or Cooperative) submits the following Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval of a variance to Minnesota Rule 7820.3800 regarding a billing error associated with one of its members. This variance request is submitted pursuant to Minnesota Rule 7829.3200.

II. Filing Requirements

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

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

A one paragraph summary accompanies this Petition.

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

Pursuant to Minn. Rules 7829.1300, subp. 2, Dakota Electric eFiles this Petition on the Minnesota Department of Commerce – Division of Energy Resources and the Office of

Attorney General – Antitrust and Utilities Division. A summary of the filing prepared in accordance with Minn. Rules 7829.1300, subp. 1 is being served on Dakota Electric’s general service list.

3. Name, Address and Telephone Number of Utility (Minn. Rule 7829.1300, subp. 4(A))

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

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

Eric F. Swanson
Winthrop & Weinstine
225 South Sixth Street, Suite 3500
Minneapolis, Minnesota 55402-4629

5. Date of Filing and Date Proposed Rate Takes Effect (Minn. Rule 7829.1300, subp. 4(C))

This Petition is being filed on November 23, 2021. Dakota Electric requests approval of a variance to Minnesota Rule 7820.3800 regarding Billing Errors to be effective immediately upon issuance of the Commission’s Order granting our Petition.

6. Statute Controlling Schedule for Processing the Filing (Minn. Rule 7829.1300, subp.4(D))

This Petition is made pursuant to Minn. Stat. § 216B.16. Minn. Rule 7825.3200 requires that utilities serve notice to the Commission at least 90 days prior to the proposed effective date of modified rates. Dakota Electric’s proposed variance falls within the definition of a “Miscellaneous Tariff Filing” under Minn. Rules 7829.0100, subp. 11. Minn. Rules 7829.1400, subp. 1 and 4 specify that comments in response to a miscellaneous filing be filed within 30 days, and reply comments be filed no later than 10 days from the expiration of the original comment period.

7. Utility Employee Responsible for Filing (Minn. Rule 7829.1300, subp. 4(E))

Adam J. Heinen
Vice President of Regulatory Services
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024
651-463-6258
aheinen@dakotaelectric.com

8. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 4(F))

The proposed variance does not affect rates or Cooperative services. The additional information required under Minn. Rule 7829.1300, subp. 4(F) is included throughout this Petition.

III. Petition

1. Background

Starting in 2019, Dakota Electric began the process of installing advanced meters and control units (AGI) for all its members. While reviewing billing data associated with one of our non-residential customers during the summer of 2021, in preparation for a transition to AGI metering, Dakota Electric observed an issue with historical billing determinants for this member. In particular, Dakota Electric discovered that the Cooperative had incorrectly applied standby charges. The member in question has an on-site solar distributed energy resource (DER) that has capacity greater than 60 kW, which means that this member is assessed standby charges as specified in Rate Schedule 60 of Dakota Electric's tariff. Dakota Electric also observed other minor coding errors that impact the member's bill that also required attention. Upon identification and confirmation of these errors, the rate application and calculation for this member was corrected and a check has been provided to the member for the most recent three years of over-billing, plus accrued interest, as allowed by Minnesota Rules and provided in Dakota Electric's Rate Book. This filing seeks to provide a refund for over-charges, including interest, back to the date of the error since Dakota Electric was able to identify when the error started.

Dakota Electric notes that the member in question is the only member we have that is currently charged standby service in the manner impacted by our calculation error. With the calculation corrected, there are no impacts to other members.

2. **Minnesota Rules and Dakota Electric Rate Book**

To resolve questions about billing errors, Dakota Electric relies on Minnesota Rules regarding billing errors and the Cooperative's Rate Book.

A. Minnesota Rules – Billing Errors

Minnesota Rule 7820.3800 governs errors related to electric bills, and provides in relevant part:

Subpart 1. Errors warranting remedy.

When a customer has been overcharged or undercharged as a result of incorrect reading of the meter, ***incorrect application of rate schedule***, incorrect connection of the meter, application of an incorrect multiplier or constant or other similar reasons, the amount of the overcharge shall be refunded to the customer or the amount of the undercharge may be billed to the customer as detailed in subparts 2 through 4. [***emphasis added***]

Subpart 2. Remedy for overcharge.

When a utility has overcharged a customer, the utility shall calculate the difference between the amount collected for service rendered and the amount the utility should have collected for service rendered plus interest, for the period beginning three years before the date of discovery. Interest must be calculated as prescribed by Minnesota Statutes, section 325E.02, paragraph (b) ...

Subpart 4. Exception if error date known.

If the date the error occurred can be fixed with reasonable certainty, the remedy shall be calculated on the basis of payments for service rendered after that date, but in no event for a period beginning more than three years before the discovery of an overcharge or one year before the discovery of an undercharge.

The billing error in question aligns with the examples listed as warranting remedy.

B. Dakota Electric Rate Book

Dakota Electric's Rate Book, Section VI, Sheet No. 12, 4th Revised covers billing corrections and states in relevant part:

Billing Corrections

When a consumer has been overcharged/undercharged as a result of an incorrect reading of the meter, ***incorrect application of the rate schedule***, incorrect connection of the meter, application of an incorrect multiplier or constant, or other similar reasons, the amount of the overcharge/undercharge shall be adjusted, refunded, or credited to the consumer. [***emphasis added***]

Remedy for Overcharge:

Dakota Electric shall calculate the difference between the amount collected for service and the amount the Cooperative should have collected for service, plus interest, for the period beginning three years before the date of discovery. Interest will be calculated as prescribed by Minnesota Statutes §325E.02(b). If the recalculated bills indicate that more than \$1 is due an existing consumer, or \$2 is due a person no longer a consumer of the Cooperative, the full amount of the calculated difference between the amount paid and the recalculated amount shall be refunded to the consumer. Refunds to an existing consumer may be in cash or credit on a bill. Credits shall be shown separately and identified.

Exception if error date is known:

If the date the error occurred can be fixed with reasonable certainty, the remedy shall be calculated on the basis of payments for service after that date, but in no event for a period beginning more than three years before the discovery of an overcharge or one year before the discovery of an undercharge.

3. Variance Request

Dakota Electric knows that the account affected by this calculation error has been incorrectly billed from the time its DER was activated in January 2017. To remedy this situation, we have already provided a refund for three years of over-charges including interest. Dakota Electric believes that the member who was over-charged is entitled to reimbursement of charges going back more than three years. This variance petition seeks to provide an additional reimbursement beyond the most recent three years.

We propose to provide an additional refund through this variance that includes over-charges back to the date when the member's DER was first initiated to its account. Detailed calculations of these amounts are included in DEA Attachment 1. We provide a

table below that outlines the overcharges and corresponding interest amounts applicable to this member.

<i>Time Period</i>	<i>Principal</i>	<i>Interest</i>	<i>Total</i>
<i>Within</i> Commission Rules: 09/18 through 08/21	\$6,418.23	\$275.98	\$6,694.21
<i>Exceeding</i> Commission Rules: 01/17 through 08/18	\$3,019.74	\$37.25	\$3,056.99
<i>Total</i>	<i>\$9,437.97</i>	<i>\$313.23</i>	<i>\$9,751.20</i>

Consistent with the Commission’s Orders in prior Dakota Electric billing error dockets, Dakota Electric will send the attached letter to the affected member informing them of the Commission’s proceeding involving this matter and how to contact the Commission to participate.¹ This letter follows the same format as letters used previously by other utilities regarding billing errors.

Determining the reasonable amount of additional reimbursement must satisfy the criteria for granting variances to the Commission’s Rules as prescribed in Minnesota Rule 7829.3200, subpart 1. These criteria are:

- A. enforcement of the rule would impose an excessive burden upon the applicant or others 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.

A. Enforcement of the Rule Would Impose an Excessive Burden.

Given the amount of time at issue, enforcement of Minnesota Rule 7820.3800 would impose a burden on the member by limiting the refund to which this member is entitled. Given the circumstances of this situation, we believe that it is fair and reasonable to

¹ DEA Attachment 2.

credit this member for the overcharged amount, including interest calculated at the rate identified in the Commission's Rule and required in our tariff.

B. Granting the Variance Does Not Adversely Affect the Public Interest.

In this case, the public interest is represented by the financial impact on the Cooperative from providing an additional refund. Dakota Electric believes it is reasonable to provide a refund corresponding to these known over-charges.

C. Variance Does Not Conflict with Standards Imposed by Law.

Dakota Electric is not aware of any conflict with any standards imposed by law. The Commission has in the past approved a utility's voluntary refund beyond the limits of its Rules when special circumstances exist affecting a member.

IV. Conclusion

For the reasons stated herein, Dakota Electric respectfully requests that the Commission approve a variance to Minnesota Rule 7820.3800 to allow for a refund for the charges billed to this member. As outlined above, we believe the criteria for variance established under Minnesota Rule 7829.3200 are met under the circumstances of this case.

Dated: November 23, 2021

Respectfully Submitted,

/s/ Adam J. Heinen

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

Certificate of Service

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

Docket No. E-111/M-21-__

Dated this 23rd day of November 2021

/s/ Melissa Cherney

Melissa Cherney

Standby Charges

	Monthly Usage												2020 Carryover	2021 Totals	
	Dec	Nov	Oct	Sept	Aug	July	June	May	April	March	Feb	Jan			
kW Demand (non-coincident from Meter)	0.00	0.00	0.00	0.00	0.00	190.08	247.68	233.28	192.96	187.20	192.96	241.92	216.00		
Original Demand															
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	7/27/2021 20:00	6/10/2021 18:00	5/24/2021 15:45	4/5/2021 18:00	3/18/2021 19:45	2/6/2021 11:00	1/19/2021 19:30			
Member peak(behind the meter)	0.00	0.00	0.00	0.00	0.00	227.47	255.54	246.85	217.12	188.93	191.64	115.80	215.65		
kW provided by DEA (at member peak)	0.00	0.00	0.00	0.00	0.00	166.92	248.66	204.77	167.10	179.02	191.64	76.95	215.65		
kW provided by Solar (at member peak)	0.00	0.00	0.00	0.00	0.00	60.55	6.88	42.08	50.02	9.91	0.00	38.85	0.00		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	7/5/2021 18:00	6/10/2021 19:00	5/25/2021 18:00	4/1/2021 8:00	3/1/2021 19:00	2/15/2021 19:00	1/19/2021 19:00			
Member peak (coincident with GRE)	0.00	0.00	0.00	0.00	0.00	0.00	234.18	236.36	193.93	118.83	174.36	19.28	204.25		
Main Meter use (coincident with GRE)	0.00	0.00	0.00	0.00	0.00	0.00	190.94	218.59	162.26	103.33	174.36	19.28	204.25		
Solar output (Coincident with GRE / 15 min)	0.00	0.00	0.00	0.00	0.00	39.89	43.24	17.77	31.67	15.50	0.00	0.00	0.00		
Solar output (Coincident with GRE / hour)	0.00	0.00	0.00	0.00	0.00	39.89	51.94	26.33	38.52	7.44	0.00	113.92	0.00		
Rate 46 demand \$	\$13.76	\$13.76	\$13.76	\$13.76	\$13.76	\$13.76	\$13.76	\$13.76	\$10.66	\$10.66	\$10.66	\$10.66	\$10.66		
Distribution Reservation \$	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89	\$3.89		
Wholesale Reservation \$ (as charged)	\$0.00	\$0.00	\$0.00	\$2.57	\$4.73	\$4.73	\$4.73	\$2.57	\$2.57	\$2.57	\$2.57	\$3.65	\$3.65		
Wholesale Reservation \$ (should be)	\$2.16	\$1.08	\$1.08	\$1.08	\$3.24	\$3.24	\$3.24	\$1.08	\$1.08	\$1.08	\$1.08	\$2.16	\$2.16		
Original Billing															
Demand for Rate 46	0.00	0.00	0.00	0.00	190.08	247.68	233.28	192.96	187.20	192.96	241.92	216.00			
Distribution Reservation kW	0.00	0.00	0.00	0.00	60.55	6.88	42.08	50.02	9.91	0.00	38.85	0.00			
Wholesale Reservation kW	0.00	0.00	0.00	0.00	39.89	51.94	26.33	38.52	7.44	0.00	113.92	0.00			
Demand \$	\$0.00	\$0.00	\$0.00	\$0.00	\$2,615.50	\$3,408.08	\$3,209.93	\$2,056.95	\$1,995.55	\$2,056.95	\$2,578.87	\$2,302.56			
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$235.54	\$26.76	\$163.69	\$194.58	\$38.55	\$0.00	\$151.13	\$0.00			
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$188.68	\$245.68	\$124.54	\$99.00	\$19.12	\$0.00	\$415.81	\$0.00			
Total Demand Charges	\$0.00	\$0.00	\$0.00	\$0.00	\$3,039.72	\$3,680.52	\$3,498.16	\$2,350.53	\$2,053.22	\$2,056.95	\$3,145.80	\$2,302.56			
Interim															
Total Demand Charges					\$3,039.72	\$3,680.52	\$3,498.16	\$2,350.53	\$2,053.22	\$2,056.95	\$3,145.80	\$2,302.56			
Revised Demand															
Member peak Demand Time	7/27/2021 20:00	7/27/2021 20:00	7/27/2021 20:00	7/27/2021 20:00	7/27/2021 20:00	7/27/2021 20:00	6/10/2021 18:00	5/24/2021 15:45	4/5/2021 18:00	3/18/2021 19:45	2/6/2021 11:00	1/19/2021 19:30			
Member peak(behind the meter)							227.47	255.52	246.84	217.10	188.95	191.64	240.52	215.64	
kW provided by DEA (at member peak)							166.92	248.64	204.76	167.08	179.04	191.64	240.52	215.64	
kW provided by Solar (at member peak)							60.55	6.88	42.08	50.02	9.91	0.00	0.00	0.00	
GRE Peak date / time	7/5/2021 18:00	7/5/2021 18:00	7/5/2021 18:00	7/5/2021 18:00	7/5/2021 18:00	7/5/2021 18:00	6/10/2021 19:00	5/25/2021 18:00	4/1/2021 8:00	3/1/2021 19:00	2/15/2021 19:00	1/19/2021 19:00			
Member peak (coincident with GRE)							210.05	235.84	237.33	194.30	128.19	169.57	206.15	208.57	
Main Meter use (coincident with GRE)							170.16	183.9	211.00	155.78	120.75	169.57	206.15	208.57	
Solar output (Coincident with GRE / hour)							39.89	51.94	26.33	38.52	7.44	0.00	0.00	0.00	
Corrected Billing															
Demand (kW)	0.00	0.00	0.00	0.00	166.92	248.64	204.76	167.08	179.04	191.64	240.52	215.64			
Distribution Reservation kW	0.00	0.00	0.00	0.00	60.55	6.88	42.08	50.02	9.91	0.00	0.00	0.00			
Wholesale Reservation kW	0.00	0.00	0.00	0.00	39.89	51.94	26.33	38.52	7.44	0.00	0.00	0.00			
Demand \$	\$0.00	\$0.00	\$0.00	\$0.00	\$2,296.82	\$3,421.29	\$2,817.50	\$1,781.07	\$1,908.57	\$2,042.88	\$2,563.94	\$2,298.72			
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$235.54	\$26.76	\$163.69	\$194.58	\$38.55	\$0.00	\$0.00	\$0.00			
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$129.24	\$168.29	\$85.31	\$41.60	\$8.04	\$0.00	\$0.00	\$0.00			
Total Demand Charges	\$0.00	\$0.00	\$0.00	\$0.00	\$2,661.60	\$3,616.34	\$3,066.50	\$2,017.25	\$1,955.15	\$2,042.88	\$2,563.94	\$2,298.72			
Interim															
Total Demand Charges					\$2,661.60	\$3,616.34	\$3,066.50	\$2,017.25	\$1,955.15	\$2,042.88	\$2,563.94	\$2,298.72			
Difference	\$0.00	\$0.00	\$0.00	\$0.00	-\$378.12	-\$64.18	-\$431.67	-\$333.28	-\$98.07	-\$14.07	-\$581.86	-\$3.84			
Interest Rate	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%	0.10%			
					-\$9,750.39	-\$9,371.49	-\$9,306.53	-\$8,874.12	-\$8,540.14	-\$8,441.36	-\$8,426.59	-\$7,844.08	-\$7,830.45	-\$9.79	-\$5.88
					-\$0.81	-\$0.78	-\$0.78	-\$0.74	-\$0.71	-\$0.70	-\$0.70	-\$0.65			

Standby Charges

	Monthly Usage												2019 Carryover	2020 Totals
	Dec	Nov	Oct	Sept	Aug	July	June	May	April	March	Feb	Jan		
kW Demand (non-coincident from Meter)	221.76	201.60	192.96	190.08	227.52	230.40	221.76	198.72	158.40	181.44	230.40	236.16		
Original Demand														
Member peak Demand Time	12/23/2020 18:15	11/15/2020 16:45	10/25/2020 18:15	9/2/2020 19:00	8/23/2020 18:00	7/24/2020 17:30	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	218.42	198.03	193.02	194.26	237.64	239.19	227.27	213.18	171.24	180.66	229.31	235.01		
kW provided by DEA (at member peak)	218.42	198.03	193.02	188.87	206.50	205.98	190.60	152.06	156.90	179.54	229.31	235.01		
kW provided by Solar (at member peak)	0.00	0.00	0.00	5.39	31.14	33.21	36.67	61.12	14.34	1.12	0.00	0.00		
GRE Peak date / time	12/14/2020 18:00	11/30/2020 18:00	10/26/2020 19:00	9/23/2020 20:00	8/25/2020 18:00	7/2/2020 19:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	186.11	156.73	163.47	139.62	220.75	217.49	217.73	143.62	121.31	152.58	215.65	208.40		
Main Meter use (coincident with GRE)	186.11	156.73	163.47	139.62	192.15	198.89	200.97	126.66	121.31	152.58	215.65	208.40		
Solar output (Coincident with GRE / 15 min)	0.00	0.00	0.00	0.00	28.60	18.60	16.76	15.65	0.00	0.00	0.00	0.00		
Solar output (Coincident with GRE / hour)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Rate 46 demand \$	\$10.66	\$10.66	\$10.66	\$10.66	\$12.26	\$12.26	\$12.26	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16
Distribution Reservation \$	\$3.89	\$3.89	\$3.89	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28
Wholesale Reservation \$ (as charged)	\$2.52	\$1.74	\$1.74	\$1.74	\$3.30	\$3.30	\$3.30	\$1.74	\$1.74	\$1.74	\$2.52	\$2.52	\$2.52	\$2.52
Wholesale Reservation \$ (should be)	\$2.52	\$1.74	\$1.74	\$1.74	\$3.30	\$3.30	\$3.30	\$1.74	\$1.74	\$1.74	\$2.52	\$2.52	\$2.52	\$2.52
Original Billing														
Demand for Rate 46	221.76	201.60	192.96	190.08	227.52	230.40	221.76	198.72	158.40	181.44	230.40	236.16		
Distribution Reservation kW	0.00	0.00	0.00	5.39	31.14	33.21	36.67	61.12	14.34	1.12	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	0.00	28.60	18.60	16.76	15.65	0.00	0.00	0.00	0.00		
Demand \$	\$2,363.96	\$2,149.06	\$2,056.95	\$2,026.25	\$2,789.40	\$2,824.70	\$2,718.78	\$1,820.28	\$1,450.94	\$1,661.99	\$2,110.46	\$2,163.23		
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$17.68	\$102.14	\$108.93	\$120.28	\$200.47	\$47.04	\$3.67	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$94.38	\$61.38	\$55.31	\$27.23	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges	\$2,363.96	\$2,149.06	\$2,056.95	\$2,043.93	\$2,985.91	\$2,995.01	\$2,894.36	\$2,047.98	\$1,497.98	\$1,665.66	\$2,110.46	\$2,163.23		
Interim			\$61.71	\$61.32	\$89.58	\$89.85	\$86.83	\$61.44	\$44.94	\$49.97	\$63.31	\$64.90		
Total Demand Charges	\$2,363.96	\$2,149.06	\$2,118.66	\$2,105.25	\$3,075.49	\$3,084.86	\$2,981.19	\$2,109.42	\$1,542.92	\$1,715.63	\$2,173.78	\$2,228.12		
Revised Demand														
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	218.4	198.04	193	194.27	237.62	239.17	227.27	213.2	171.26	180.64	229.32	235		
kW provided by DEA (at member peak)	218.4	198.04	193	188.88	206.48	205.96	190.6	152.08	156.92	179.52	229.32	235		
kW provided by Solar (at member peak)	0	0	0	5.39	31.14	33.21	36.67	61.12	14.34	1.12	0	0		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	183.34	161.78	160.28	143.6	227.63	214.93	215.37	143.09	128.87	153.23	204.72	208.05		
Main Meter use (coincident with GRE)	183.34	161.78	160.28	143.6	188.14	187.41	189.56	127.44	128.87	153.23	204.72	208.05		
Solar output (Coincident with GRE / hour)	0	0	0	0	39.49	27.79	25.81	15.65	0	0	0	0		
Corrected Billing														
Demand (kW)	218.40	198.04	193.00	188.88	206.48	205.96	190.60	152.08	156.92	179.52	229.32	235.00		
Distribution Reservation kW	0.00	0.00	0.00	5.39	31.14	33.21	36.67	61.12	14.34	1.12	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	0.00	39.49	27.79	25.81	15.65	0.00	0.00	0.00	0.00		
Demand \$	\$2,328.14	\$2,111.11	\$2,057.38	\$2,013.46	\$2,531.44	\$2,525.07	\$2,336.76	\$1,393.05	\$1,437.39	\$1,644.40	\$2,100.57	\$2,152.60		
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$17.68	\$102.14	\$108.93	\$120.28	\$200.47	\$47.04	\$3.67	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$0.00	\$130.32	\$91.71	\$85.17	\$27.23	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges	\$2,328.14	\$2,111.11	\$2,057.38	\$2,031.14	\$2,763.90	\$2,725.71	\$2,542.21	\$1,620.76	\$1,484.42	\$1,648.08	\$2,100.57	\$2,152.60		
Interim			\$61.72	\$60.93	\$82.92	\$81.77	\$76.27	\$48.62	\$44.53	\$49.44	\$63.02	\$64.58		
Total Demand Charges	\$2,328.14	\$2,111.11	\$2,119.10	\$2,092.07	\$2,846.82	\$2,807.48	\$2,618.47	\$1,669.38	\$1,528.96	\$1,697.52	\$2,163.59	\$2,217.18		
Difference	-\$35.82	-\$37.95	\$0.44	-\$13.18	-\$228.67	-\$277.39	-\$362.72	-\$440.04	-\$13.96	-\$18.11	-\$10.19	-\$10.94		
Interest Rate	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%	1.50%		
	-\$7,830.45	-\$7,784.90	-\$7,737.28	-\$7,728.06	-\$7,705.25	-\$7,467.25	-\$7,180.88	-\$6,809.65	-\$6,361.66	-\$6,339.77	-\$6,313.76	-\$6,295.70	-\$6,270.65	-\$6,270.65
	-\$9.79	-\$9.73	-\$9.67	-\$9.66	-\$9.63	-\$9.33	-\$8.98	-\$8.51	-\$7.95	-\$7.92	-\$7.89	-\$7.87	-\$14.11	-\$106.94

Standby Charges

	Monthly Usage												2018 Carryover	2019 Totals
	Dec	Nov	Oct	Sept	Aug	July	June	May	April	March	Feb	Jan		
kW Demand (non-coincident from Meter)	239.04	213.12	167.04	210.24	227.52	230.40	216.00	175.68	175.68	244.80	227.52	267.84		
Original Demand														
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	236.39	210.47	167.96	213.18	238.06	242.62	223.57	192.69	177.32	243.99	228.79	268.36		
kW provided by DEA (at member peak)	236.39	210.47	167.96	204.60	223.78	217.04	114.57	132.54	137.89	243.99	228.79	268.36		
kW provided by Solar (at member peak)	0.00	0.00	0.00	8.58	14.28	25.58	109.00	60.15	39.43	0.00	0.00	0.00		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	232.07	206.48	150.68	201.95	219.72	229.13	216.99	185.35	137.20	227.40	221.36	234.49		
Main Meter use (coincident with GRE)	232.07	206.48	150.68	184.03	177.47	195.44	176.77	145.15	137.20	227.40	221.36	234.49		
Solar output (Coincident with GRE / 15 min)	0.00	0.00	0.00	17.92	43.83	31.14	48.68	46.23	0.00	0.00	0.00	0.00		
Solar output (Coincident with GRE / hour)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Rate 46 demand \$	\$9.16	\$9.16	\$9.16	\$9.16	\$12.26	\$12.26	\$12.26	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16		
Distribution Reservation \$	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28		
Wholesale Reservation \$ (as charged)	\$2.45	\$1.68	\$1.68	\$1.68	\$3.21	\$3.21	\$3.21	\$1.68	\$1.68	\$1.68	\$1.68	\$2.45		
Wholesale Reservation \$ (should be)	\$2.45	\$1.68	\$1.68	\$1.68	\$3.21	\$3.21	\$3.21	\$1.68	\$1.68	\$1.68	\$1.68	\$2.45		
Original Billing														
Demand for Rate 46	239.04	213.12	167.04	210.24	227.52	230.40	216.00	175.68	175.68	244.80	227.52	267.84		
Distribution Reservation kW	0.00	0.00	0.00	8.58	14.28	25.58	109.00	60.15	39.43	0.00	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	17.92	43.83	31.14	48.68	46.23	0.00	0.00	0.00	0.00		
Demand \$	\$2,189.61	\$1,952.18	\$1,530.09	\$1,925.80	\$2,789.40	\$2,824.70	\$2,648.16	\$1,609.23	\$1,609.23	\$2,242.37	\$2,084.08	\$2,453.41		
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$28.14	\$46.84	\$83.90	\$357.52	\$197.29	\$129.33	\$0.00	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$30.11	\$140.69	\$99.96	\$156.26	\$77.67	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges	\$2,189.61	\$1,952.18	\$1,530.09	\$1,984.05	\$2,976.93	\$3,008.57	\$3,161.94	\$1,884.19	\$1,738.56	\$2,242.37	\$2,084.08	\$2,453.41		
Interim	\$65.69													
Total Demand Charges	\$2,255.29	\$1,952.18	\$1,530.09	\$1,984.05	\$2,976.93	\$3,008.57	\$3,161.94	\$1,884.19	\$1,738.56	\$2,242.37	\$2,084.08	\$2,453.41		
Revised Demand														
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	236.4	210.48	167.96	213.18	238.04	242.62	223.56	192.67	177.31	244	228.8	268.36		
kW provided by DEA (at member peak)	236.4	210.48	167.96	204.6	223.76	217.04	114.56	132.52	137.88	244	228.8	268.36		
kW provided by Solar (at member peak)	0	0	0	8.58	14.28	25.58	109	60.15	39.43	0	0	0		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	232.27	207.53	150.47	200.79	219.92	233.62	218.06	176.13	131.89	208.35	212.94	241.83		
Main Meter use (coincident with GRE)	232.27	207.53	150.47	173.28	176.09	202.48	169.38	129.9	131.89	208.35	212.94	241.83		
Solar output (Coincident with GRE / hour)	0	0	0	27.51	43.83	31.14	48.68	46.23	0	0	0	0		
Corrected Billing														
Demand (kW)	236.40	210.48	167.96	204.60	223.76	217.04	114.56	132.52	137.88	244.00	228.80	268.36		
Distribution Reservation kW	0.00	0.00	0.00	8.58	14.28	25.58	109.00	60.15	39.43	0.00	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	27.51	43.83	31.14	48.68	46.23	0.00	0.00	0.00	0.00		
Demand \$	\$2,165.42	\$1,928.00	\$1,538.51	\$1,874.14	\$2,743.30	\$2,660.91	\$1,404.51	\$1,213.88	\$1,262.98	\$2,235.04	\$2,095.81	\$2,458.18		
Distribution Reservation \$	\$0.00	\$0.00	\$0.00	\$28.14	\$46.84	\$83.90	\$357.52	\$197.29	\$129.33	\$0.00	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$46.22	\$140.69	\$99.96	\$156.26	\$77.67	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges	\$2,165.42	\$1,928.00	\$1,538.51	\$1,948.50	\$2,930.83	\$2,844.77	\$1,918.29	\$1,488.84	\$1,392.31	\$2,235.04	\$2,095.81	\$2,458.18		
Interim	\$64.96													
Total Demand Charges	\$2,230.39	\$1,928.00	\$1,538.51	\$1,948.50	\$2,930.83	\$2,844.77	\$1,918.29	\$1,488.84	\$1,392.31	\$2,235.04	\$2,095.81	\$2,458.18		
Difference	-\$24.91	-\$24.18	\$8.43	-\$35.55	-\$46.10	-\$163.79	-\$1,243.65	-\$395.35	-\$346.25	-\$7.33	\$11.72	\$4.76		
Interest Rate	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%	2.70%		
Cumulative Interest	-\$6,270.65	-\$6,231.72	-\$6,193.60	-\$6,188.11	-\$6,138.74	-\$6,078.97	-\$5,901.90	-\$4,647.78	-\$4,242.89	-\$3,887.90	-\$3,871.86	-\$3,874.86	-\$3,874.46	-\$5.17
	-\$14.11	-\$14.02	-\$13.94	-\$13.92	-\$13.81	-\$13.68	-\$13.28	-\$10.46	-\$9.55	-\$8.75	-\$8.71	-\$8.72	-\$5.17	-\$142.94

Standby Charges

	Monthly Usage												2017 Carryover	2018 Totals
	Dec	Nov	Oct	Sept	Aug	July	June	May	April	March	Feb	Jan		
kW Demand (non-coincident from Meter)	213.12	213.12	169.92	207.36	218.88	227.52	230.40	210.24	192.96	198.72	224.64	259.20		
Original Demand														
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	210.47	212.89	167.73	210.12	238.18	235.48	235.51	209.78	195.02	198.37	222.91	255.40		
kW provided by DEA (at member peak)	210.47	212.89	145.32	147.23	192.15	221.88	210.64	209.78	193.54	198.37	222.91	255.40		
kW provided by Solar (at member peak)	0.00	0.00	22.41	62.89	46.03	13.60	24.87	13.67	1.48	0.00	0.00	0.00		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	184.38	187.66	147.92	206.51	212.89	197.85	226.34	187.32	158.28	145.84	195.61	218.59		
Main Meter use (coincident with GRE)	184.38	187.66	147.92	186.80	175.22	166.92	185.93	187.32	158.28	145.84	195.61	218.59		
Solar output (Coincident with GRE / 15 min)	0.00	0.00	0.00	30.44	48.87	23.38	50.59	1.43	0.00	0.00	0.00	0.00		
Solar output (Coincident with GRE / hour)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		
Rate 46 demand \$	\$9.16	\$9.16	\$9.16	\$9.16	\$12.26	\$12.26	\$12.26	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16	\$9.16
Distribution Reservation \$	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28	\$3.28
Wholesale Reservation \$ (as charged)	\$2.47	\$1.74	\$1.74	\$1.74	\$3.21	\$3.21	\$3.21	\$1.74	\$1.74	\$1.74	\$2.52	\$2.52	\$2.52	\$2.52
Wholesale Reservation \$ (should be)	\$2.47	\$1.74	\$1.74	\$1.74	\$3.21	\$3.21	\$3.21	\$1.74	\$1.74	\$1.74	\$3.24	\$3.24	\$3.24	\$3.24
Original Billing														
Demand for Rate 46	213.12	213.12	169.92	207.36	218.88	227.52	230.40	210.24	192.96	198.72	224.64	259.20		
Distribution Reservation kW	0.00	0.00	22.41	62.89	46.03	13.60	24.87	13.67	1.48	0.00	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	30.44	48.87	23.38	50.59	1.43	0.00	0.00	0.00	0.00		
Demand \$	\$1,952.18	\$1,952.18	\$1,556.47	\$1,899.42	\$2,683.47	\$2,789.40	\$2,824.70	\$1,925.80	\$1,767.51	\$1,820.28	\$2,057.70	\$2,374.27		
Distribution Reservation \$	\$0.00	\$0.00	\$73.50	\$206.28	\$150.98	\$44.61	\$81.57	\$44.84	\$4.85	\$0.00	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$52.97	\$156.87	\$75.05	\$162.39	\$2.49	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges Interim	\$1,952.18	\$1,952.18	\$1,629.97	\$2,158.66	\$2,991.32	\$2,909.05	\$3,068.67	\$1,973.12	\$1,772.37	\$1,820.28	\$2,057.70	\$2,374.27		
Total Demand Charges	\$1,952.18	\$1,952.18	\$1,629.97	\$2,158.66	\$2,991.32	\$2,909.05	\$3,068.67	\$1,973.12	\$1,772.37	\$1,820.28	\$2,057.70	\$2,374.27		
Revised Demand														
Member peak Demand Time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak(behind the meter)	210.48	212.88	167.73	210.13	238.19	235.48	235.51	222.43	195	198.36	222.92	255.4		
kW provided by DEA (at member peak)	210.48	212.88	145.32	147.24	192.16	221.88	210.64	208.76	193.52	198.36	222.92	255.4		
kW provided by Solar (at member peak)	0	0	22.41	62.89	46.03	13.6	24.87	13.67	1.48	0	0	0		
GRE Peak date / time	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00	1/0/1900 0:00
Member peak (coincident with GRE)	189.12	183.05	151.98	201.26	210.61	208.06	220.49	192.25	158.5	143.81	189.69	217.47		
Main Meter use (coincident with GRE)	189.12	183.05	151.98	170.82	161.74	184.68	169.9	190.82	158.5	143.81	189.69	217.47		
Solar output (Coincident with GRE / hour)	0	0	0	30.44	48.87	23.38	50.59	1.43	0	0	0	0		
Corrected Billing														
Demand (kW)	210.48	212.88	145.32	147.24	192.16	221.88	210.64	208.76	193.52	198.36	222.92	255.40		
Distribution Reservation kW	0.00	0.00	22.41	62.89	46.03	13.60	24.87	13.67	1.48	0.00	0.00	0.00		
Wholesale Reservation kW	0.00	0.00	0.00	30.44	48.87	23.38	50.59	1.43	0.00	0.00	0.00	0.00		
Demand \$	\$1,928.00	\$1,949.98	\$1,331.13	\$1,348.72	\$2,355.88	\$2,720.25	\$2,582.45	\$1,912.24	\$1,772.64	\$1,816.98	\$2,041.95	\$2,339.46		
Distribution Reservation \$	\$0.00	\$0.00	\$73.50	\$206.28	\$150.98	\$44.61	\$81.57	\$44.84	\$4.85	\$0.00	\$0.00	\$0.00		
Wholesale Reservation \$	\$0.00	\$0.00	\$0.00	\$52.97	\$156.87	\$75.05	\$162.39	\$2.49	\$0.00	\$0.00	\$0.00	\$0.00		
Total Demand Charges Interim	\$1,928.00	\$1,949.98	\$1,404.64	\$1,607.96	\$2,663.73	\$2,839.91	\$2,826.41	\$1,959.57	\$1,777.50	\$1,816.98	\$2,041.95	\$2,339.46		
Total Demand Charges	\$1,928.00	\$1,949.98	\$1,404.64	\$1,607.96	\$2,663.73	\$2,839.91	\$2,826.41	\$1,959.57	\$1,777.50	\$1,816.98	\$2,041.95	\$2,339.46		
Difference	-\$24.18	-\$2.20	-\$225.34	-\$550.70	-\$327.59	-\$69.15	-\$242.26	-\$13.56	\$5.13	-\$3.30	-\$15.76	-\$34.81		
Interest Rate	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%	1.60%		
Cumulative Interest	-\$3,874.46	-\$3,845.15	-\$3,837.83	-\$3,607.69	-\$3,052.92	-\$2,721.70	-\$2,649.02	-\$2,403.56	-\$2,386.82	-\$2,388.77	-\$2,382.29	-\$2,363.39	-\$2,327.03	-\$1.55
	-\$5.17	-\$5.13	-\$5.12	-\$4.81	-\$4.07	-\$3.63	-\$3.53	-\$3.20	-\$3.18	-\$3.19	-\$3.18	-\$3.15	-\$3.15	-\$47.35



November #, 2021

Member Name
Member Address

RE: DAKOTA ELECTRIC BILLING ERROR VARIANCE REQUEST
MINNESOTA PUBLIC UTILITIES COMMISSION (PUC) DOCKET NO. E-111/M-21- ____

Dear Member:

On November #, 2021, we issued you a check for \$6,694.21 (\$6,418.23 previously billed, plus \$275.98 interest for September 2018 to August 2021). For certain types of billing errors, PUC Rules require a refund going back three years. In some cases, Dakota Electric Association may ask the PUC for permission to refund more than the three year period (called a *variance*).

We have asked the PUC for permission to refund your account an additional \$3,056.99 (\$3,019.74 previously billed plus \$37.25 interest for January 2017 to August 2018). A copy of our variance request for your account is enclosed.

If you have any concerns or would like to participate in the variance process, you may contact the PUC at:

Email: consumer.puc@state.mn.us

Phone: 651-296-0406 or toll-free, 1-800-657-3782

Citizens with hearing or speech disabilities may call the PUC through
Minnesota Relay by dialing 711 or 1-800-627-3529

Mail: 121 Seventh Place East, Suite 350
Saint Paul, Minnesota 55101.

If you have questions about the billing adjustment or general questions about the variance process, feel free to contact me at ndevine@dakotaelectric.com, or by phone at (651) 463-6352.

Sincerely,

Nick Devine
CIS/Billing Manager
Enclosure