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October 30, 2025

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

Re: *In the Matter of the Application of Dakota Electric Association for Authority to Increase Rates for Electric Service in Minnesota*
MPUC Docket No. E-111/GR-24-400
CAH Docket No. 65-2500-40635

Dear Ms. Bergman,

The Office of the Attorney General—Residential Utilities Division (OAG) respectfully submits this letter in response to the Stipulated Findings of Fact, Conclusions of Law, and Recommendation to Approve Settlement issued by Administrative Law Judge Ann C. O'Reilly on October 16, 2025 (ALJ Report). The OAG is a party to the Settlement Agreement filed on June 6, 2025. The OAG takes no exceptions to the ALJ Report and recommends that the Commission adopt it.

The OAG appreciates Judge O'Reilly's work through this proceeding and agrees with her conclusion that the record supports the settlement's resolution of disputed issues.

Importantly, the settlement provides financial benefits to Minnesota's residential and small-business ratepayers. The settlement provides for a smaller increase than requested by Dakota Electric Association, reducing the Association's revenue deficiency by approximately \$2.93 million from its initial request.¹ The settlement allocates a smaller share of the overall increase to the Residential class than originally proposed and a reduced fixed charge,² which is important given concerns from public commentators about the size of the proposed Residential increase noted in the ALJ Report.³ For these reasons and others detailed in full in the settlement, the settlement is reasonable, supported by substantial evidence, and consistent with the public interest. The Commission should accept the settlement.

Sincerely,

/s/ **Wendy Raymond**

WENDY RAYMOND
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¹ Settlement Agreement, Attach. 1 (June 6, 2025) (eDocket No. 20256-219692-01).

² *Id.* ¶ 38, Attachment 2.

³ ALJ Report ¶ 38.

CERTIFICATE OF SERVICE

**Re: *In the Matter of the Application of Dakota Electric Association for Authority to
Increase Rates for Electric Service in Minnesota
MPUC Docket No. E-111/GR-24-400
CAH Docket No. 65-2500-40635***

I, CHRIS OSBORNE, hereby certify that on the 30th day of October 2025, I e-filed with eDockets *Office of the Attorney General—Residential Utilities Division Letter in Support of ALJ Report and Settlement Approval* and served a true and correct copy of the same upon all parties listed on the attached service list by electronic submission through the Minnesota Public Utilities Commission eDockets website.

/s/ Chris Osborne
CHRIS OSBORNE

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Katherine	Arnold	katherine.arnold@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	24-400 Official CC Service List
2	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	24-400 Official CC 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		No	24-400 Official CC Service List
4	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	24-400 Official CC Service List
5	Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-400 Official CC Service List
6	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	24-400 Official CC Service List
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-400 Official CC Service List
8	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	24-400 Official CC Service List
9	Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association		4300 220th Street Farmington MN, 55024-9583 United States	Electronic Service		No	24-400 Official CC Service List
10	Amrit	Hundal	amrit.hundal@ag.state.mn.us		Office of the Attorney General - Department of Commerce		Electronic Service		No	24-400 Official CC Service List
11	Ann	O'Reilly	ann.oreilly@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55101 United States	Electronic Service		Yes	24-400 Official CC Service List
12	Wendy	Raymond	wendy.raymond@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota Street Suite 600 St. Paul MN, 55101 United States	Electronic Service		No	24-400 Official CC Service List
13	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	24-400 Official CC Service List
14	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN,	Electronic Service		Yes	24-400 Official CC Service List

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