



October 28, 2020

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

***Subject: In the Matter of a Petition by Dakota Electric Association
Limiting the Availability of Temporary Service
Docket No. E-111/M-20-744***

Dakota Electric Association Reply Comments

Dear Mr. Seuffert:

On September 22, 2020, Dakota Electric Association® (Dakota Electric® or Cooperative) submitted a petition requesting approval to limit the availability of temporary service extensions to commercial accounts only.

On October 20, 2020, the Minnesota Department of Commerce (Department or DOC) submitted Comments on this Cooperative petition. The Department requests that Dakota Electric provide the following information in Reply Comments:

- whether DEA will still be able to provide permanent electric service to residential customers within 90 days, and
- a brief discussion of any financial effects of the proposal tariff change on the Cooperative's future cash-flows

Dakota Electric Reply Comments

Dakota Electric appreciates the DOC review of our petition and concurs with statements in the DOC Comments including:

- “Operationally, providing temporary service doubles and could potentially triple the number of site visits that DEA staff would need to make to place permanent service.”
- Minnesota statute “does not address temporary service specifically, nor does it require it.”
- Minnesota rule “does not state that a utility is required to provide temporary service installations to any or all customer classes.”
- “The Department concludes that DEA’s request to limit temporary service to commercial customers does not violate Minnesota statute or rules if the Cooperative will be able to provide permanent electric service to residential customers within 90 days.”

Dakota Electric would like to provide one clarification. The Department summarized three reasons that Dakota Electric identified in support of this filing. One reason summarized by the DOC states, “The duration of use of temporary service to a residential site is usually short when compared to a commercial account, so little revenue is generated from the temporary service.” For the Cooperative, the amount of electric revenue collected while service is provided through temporary facilities is not an issue. Rather, it is inefficient use of resources to provide the temporary service for just a short time before we are asked to remove the temporary facilities and install permanent electric service. It is the typical short-term duration that the temporary facilities are being utilized that prompts this filing by Dakota Electric.

Following is our response to the questions posed in the DOC Comments.

Providing service within 90 days

Dakota Electric’s 2019 Safety Reliability and Service Quality (SRSQ) report, which is submitted to the MPUC as an informational filing, identifies the time to provide electric service to locations not previously served as follows:

“In 2019, the average response times for Dakota Electric to complete service installations to locations not previously served is as follows:

	<u>Extension Requests</u>	<u>Average Response Time</u>
Residential	589	4.36 Business Days (5.46 Calendar Days)
Commercial	126	4.75 Business Days (6.04 Calendar Days)
<i>TOTAL</i>	<i>715</i>	<i>4.43 Business Days (5.56 Calendar Days)</i>

These response times are well within the 90 days specified in statute.

Financial effects of tariff change

While this petition does not affect any existing rates, Dakota Electric will experience changes in future cash flow as noted by the Department. Dakota Electric installs about 150 residential temporary services each year. The charges we apply to these installations are for labor and vehicle costs to make the installation. When we eliminate the temporary installations for residential sites, we will no longer collect the revenue associated with the labor and vehicle costs, but we will still have the same number of employees and vehicles. Dakota Electric reviewed the costs for installations in 2019 and found that charges for residential temporary service installations was about \$44,000. Dakota Electric will no longer collect this revenue if the Commission approves our petition.

Conclusion

Dakota Electric appreciates the opportunity to provide these Reply Comments. For the reasons stated in our original petition and additional information provided in these Reply Comments, Dakota Electric respectfully requests that the Commission approve language that limits the availability of temporary service installations to identified commercial rate schedules.

Sincerely,

/s/ Douglas R. Larson

Douglas R. Larson
Vice President of Regulatory Services
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024

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-20-744

Dated this 28th day of October 2020

/s/ Melissa Cherney

Melissa Cherney

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ryan	Barlow	ryan.barlow@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101214	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Eric	Fehlhaber	efehlhaber@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	Yes	GEN_SL_Dakota Electric Association_General Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List