

December 14, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E278, E106/SA-21-804

Dear Mr. Seuffert:

Attached are the *Comments* of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

The Joint Request of the City of Mountain Iron and Lake Country Power for Approval to Update Electric Service Territory Records.

The petition was filed November 17, 2021 by:

Kathleen M. Brennan  
McGrann Shea Carnival  
Straughn & Lamb, Chtd.  
800 Nicollet Mall, Suite 2600  
Minneapolis, MN 55402

The Department recommends that the Minnesota Public Utilities Commission (Commission) approve the requested permanent service territory transfer from Lake Country Power to the City of Mountain Iron and is available to answer any questions the Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JPK/ar  
Attachment



## Before the Minnesota Public Utilities Commission

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### Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E278, E106/SA-21-804

#### I. BACKGROUND

The City of Mountain Iron (“Mountain Iron” or “the Municipal”) is an electric municipal utility organized and existing under the laws of the State of Minnesota. Lake Country Power (“Lake Country” or “the Cooperative”) is an electric distribution cooperative organized and existing under the laws of the State of Minnesota.

#### II. SUMMARY OF PROPOSAL

On November 17, 2021, the Municipal and Cooperative, collectively the Parties, jointly filed a petition (Petition) under Minn. Stat. § 216B.44, asking the Minnesota Public Utilities Commission (Commission) to modify the Parties’ service territory boundaries. Approval of the Parties’ request would permanently transfer the Affected Area located within the electric service territory assigned to Lake Country that is also within the City limits of Mountain Iron from the Cooperative to the Municipal.

#### III. DEPARTMENT ANALYSIS

##### A. *TRANSFER OF THE AFFECTED AREA FROM THE MUNICIPAL TO THE COOPERATIVE*

Exhibit A is a map of the Affected Area, which involves one area of approximately 30 acres. The Municipal currently serves two existing residential customers and a city-owned lift station in the Affected Area. The City of Mountain Iron is also providing construction service to a future residence. The Cooperative does not currently serve any customers in the Affected Area.

Exhibit B includes a legal description of the Affected Area.

The South Half of the South Half of the Northeast Quarter of the Southwest Quarter of Section 13, Township 58 North, Range 18 West of the Fourth Principle Meridian, City of Mountain Iron, St. Louis County, Minnesota. Except Minerals.

And

The North Half of the Southeast Quarter of the Southwest Quarter of Section 13, Township 58 North, Range 18 West of the Fourth Principle Meridian, City of Mountain Iron, St. Louis County, Minnesota. Except Minerals.

Exhibit C to the Petition includes a draft customer notice that the City of Mountain Iron proposed to send to all customers in the Affected Area.

Per the Petition, the proposed transfer would be a permanent transfer of service territory. Further, the transfer of service territory would not impact any customers. The municipal is currently serving all customers in the Affected Area. The City of Mountain Iron will continue to serve those customers.

*B. INTERIM SERVICE*

This is not an issue in this docket as the City is currently serving all customers in the Affected Area.

*C. CUSTOMER NOTICE*

The Municipal filed a certificate of service indicating it mailed a customer notice to all existing customers in the Affected Area on November 22, 2021.

*D. COMPENSATION*

The filing mentioned that the Parties have agreed to appropriate compensation.

**IV. RECOMMENDATION**

The Department recommends the Commission approve the permanent service territory transfer from Lake Country Power to the City of Mountain Iron. MnGeo should update the Commission's maps to reflect the service area designations as shown on the map in the Petition.

/ar

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Comments**

**Docket No. E278, E106/SA-21-804**

**Dated this 14<sup>th</sup> day of December 2021**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Bakk	mbakk@lcp.coop	Lake Country Power	26039 Bear Ridge Drive  Cohasset, MN 55721	Electronic Service	No	OFF_SL_21-804_SA-21-804
Kathleen M.	Brennan	kmb@mcgrannshea.com	McGrann Shea Carnival, Straughn & Lamb, Chartered	800 Nicollet Mall Ste 2600  Minneapolis, MN 554027035	Electronic Service	No	OFF_SL_21-804_SA-21-804
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-804_SA-21-804
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-804_SA-21-804
Sara G	McGrane	smcgrane@felhaber.com	Felhaber Larson	220 S 6th St Ste 2200  Minneapolis, MN 55420	Electronic Service	No	OFF_SL_21-804_SA-21-804
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	Yes	OFF_SL_21-804_SA-21-804
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-804_SA-21-804
Craig	Wainio	cwainio@ci.mountain-iron.mn.us	City of Mountain Iron	8586 Enterprise Dr S  Mountain Iron, MN 55768	Electronic Service	No	OFF_SL_21-804_SA-21-804