

December 17, 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. E270, E139/SA-21-805

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 Madelia Light and Power and South Central Electric Association 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 South Central Electric Association to Madelia Light and Power and is available to answer any questions the Commission may have.

Sincerely,

/s/ JOHN KUNDERT  
Financial Analyst

JPK/ja  
Attachment



## Before the Minnesota Public Utilities Commission

---

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

Docket No. E270, E139/SA-21-805

#### I. BACKGROUND

Madelia Light and Power (“Madelia” or “the Municipal”) is an electric municipal utility organized and existing under the laws of the State of Minnesota. South Central Electric Association (“SCEA” 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 SCEA 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 75.70 acres. Neither the Cooperative nor the Municipal currently serves existing customers in the Affected Area according to the Petition.

At the Department’s request, the Parties provided the following legal description of the Affected Area.

1. On the West by 830<sup>th</sup> Ave.
2. On the North by Minnesota State Highway 15.
3. On the East by the on-ramp to Minnesota State Highway 60 continuing along the west side of Minnesota State Highway 60.
4. On the South from the west side of State Highway 60 to the City boundary on the north side of Second Street NE.

Per the Petition, the proposed transfer would be a permanent transfer of service territory.

*B. INTERIM SERVICE*

The Parties have agreed that the Municipal has the right and obligation to serve all future customers in the Affected Area as of January 1, 2021.

*C. CUSTOMER NOTICE*

The Municipal did file a certificate of service that it mailed a customer notice to all existing customers in the Affected Area on November 30, 2021. That customer notice suggests that the Municipal is currently serving at least one customer in the Affected Area.

*D. COMPENSATION*

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

**IV. RECOMMENDATION**

The Department recommends that the Commission approve the permanent service territory transfer from South Central Electric Association to Madelia Light and Power. MnGeo should update the Commission's maps to reflect the service area designations as shown on the map in the Petition.

### **CERTIFICATE OF SERVICE**

I, Linda Chavez, hereby certify that I have this day served copies of the following document on the attached list of persons by electronic filing, 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 Nos.    **E270, E139/SA-21-805**

Dated this **17th** day of **December 2021**.

/s/Linda Chavez

---

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mark	Anderson	manderson@southcentralelectric.com	South Central Electric Association	PO Box 150 71176 Tiell Drive St. James, MN 56081	Electronic Service	No	OFF_SL_21-805_SA-21-805
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_21-805_SA-21-805
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_21-805_SA-21-805
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_21-805_SA-21-805
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_21-805_SA-21-805
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_21-805_SA-21-805
Christopher	Trembley	ctrembley@madelialightandpower.com	Madelia Municipal Light & Power	24 Abbot Ave SW  Madelia, MN 56062	Electronic Service	No	OFF_SL_21-805_SA-21-805