August 15, 2025

The Honorable Ann O'Reilly
Administrative Law Judge
Court of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

VIA ELECTRONIC FILING

Re: Summary of Public Comments

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

Dear Judge O'Reilly:

Enclosed, please find Appendix B to the Joint Proposed Findings of Fact, Conclusions of Law, and Recommendation, filed on August 13, 2025, which is a Summary of Public Comments, filed on behalf of Dakota Electric Association, the Department of Commerce, Division of Energy Resources, and the Office of the Attorney General – Residential Utilities Division.

A courtesy copy of the enclosed Summary of Public Comments has been sent via email in Microsoft Word format to the Administrative Law Judge and court reporter and by U.S. Mail to the Administrative Law Judge.

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CAH Docket No. 65-2500-40635
MPUC Docket No. E-111/GR-24-400

STATE OF MINNESOTA
BEFORE THE MINNESOTA COURT OF ADMINISTRATIVE HEARINGS
FOR THE MINNESOTA PUBLIC UTILITIES COMMISSION

In The Matter of the Application of Dakota Electric Association for Authority to Increase Rates for Electric Service in Minnesota	**APPENDIX B TO PROPOSED FINDINGS OF FACT, CONCLUSIONS OF LAW, AND RECOMMENDATION TO APPROVE SETTLEMENT**

SUMMARY OF PUBLIC COMMENTS

A. Comments Made at Public Hearings

1. The Administrative Law Judge convened three public hearings—two in person at the Rosemount Community Center, 13885 South Robert Trail, Rosemount, Minnesota and at the Apple Valley Senior & Event Center, 14601 Hayes Road, Apple Valley, MN, and one virtual public hearing.[1]

2. Thirteen members of the public provided oral comments including questions at the public hearings—two spoke at the virtual hearing, eight spoke at the Apple Valley hearing, and three spoke at the Rosemount hearing. Commenters also raised concerns regarding the communication of the public hearing process,[2] interim rate increases,[3] and overall notification of the Cooperative's rate request.[4] They also raised concerns regarding the proposed rate increase,[5] residential customers' ability to absorb the

[1] *See* FIRST PREHEARING ORDER (Feb. 27, 2025) (eDocket No. 20252-215848-01); Approval of Public Hearing Customer Notice (Mar. 14, 2025) (eDocket No. 20253-216388-01).
[2] Apple Valley Pub. Hrg. Tr. earing Transcript (May 7, 2025) at 54, 56-57, 60, 70, 80-81 (May 7, 2025), Rosemount Pub. Hrg. Tr. at 36, 37, 43, 44 (May 7, 2025).
[3] Apple Valley Pub. Hrg. Tr. at 43 (May 7, 2025), Virtual Pub. Hrg. Tr. at 37 (May 6, 2025), Rosemount Pub. Hrg. Tr. at 37 (May 7, 2025).
[4] Apple Valley Pub. Hrg. Tr. at 46, 70, 71 (May 7, 2025), Rosemount Pub. Hrg. Tr. at 39, 44, .
[5] Virtual Pub. Hrg. Tr. (May 6, 2025), Apple Valley Pub. Hrg. Tr. (May 7, 2025), Rosemount Pub. Hrg. Tr. (May 7, 2025).

Cooperative's proposal,[6] and asked questions about the factors driving the rate increase and the ratemaking process.[7]

3. The following comments were received at the May 6, 2025 virtual public hearing held via Webex:[8]

- Bill Watkins asked about how the proposed rate increase will be applied, especially for electric vehicles.[9] He also asked about the increase in on- and off-peak electricity rates and whether the interim rate increase would be applied as a flat kilowatt fee or proportionally, expressing concern that a flat interim rate charge would disproportionately impact users who rely on off-peak electricity.[10]

- Mary Nell Zellner also asked about the increase in on- and off- peak electricity rates.[11] She commented that not everyone was able to move their schedules or adjust schedules to complete tasks during off-peak hours and felt there was a question about fairness.[12]

4. The following comments were made at the May 7, 2025 hearing held in Apple Valley:[13]

- Larry Moehring asked about Dakota Electric's return on investment and commented on Dakota Electric's good service quality.[14]

- Bill Laramy asked questions about residential service increases versus general service increases and discussed why he believed general service consumers may have more flexibility to absorb a larger rate increase compared to residential consumers on fixed incomes.[15]

- Hiliary Swanson asked about interim rates. She also asked about long-term investments, specific increases for labor and vehicle costs, and about how the Cooperative's membership dues were factored into rates.[16]

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[6] Apple Valley Pub. Hrg. Tr. at 34 (May 7, 2025); Apple Valley Pub. Hrg. Tr. at 39, 58, 66 (May 7, 2025); Rosemount Pub. Hrg. Tr. at 50 (May 7, 2025).
[7] Virtual Pub. Hrg. Tr. at 36-37, 42-44 (May 6, 2025); Apple Valley Pub. Hrg. Tr. at 31, 46, 50, 54-55, 61, 67, 76, 77 (May 7, 2025); Rosemount Pub. Hrg. Tr. at 32, 34-35, 46-48, 54-55.
[8] Virtual Pub. Hrg. Tr. (May 6, 2025).
[9] Virtual Pub. Hrg. Tr. at 33-34 (May 6, 2025).
[10] Virtual Pub. Hrg. Tr at 36-37, 39 (May 6, 2025).
[11] Virtual Pub. Hrg. Tr at 52-55 (May 6, 2025).
[12] Virtual Publ. Hrg. Tr at 44 (May 6, 2025).
[13] Apple Valley Pub. Hrg. Tr (May 7, 2025).
[14] Apple Valley Pub. Hrg. Tr. at 32-33 (May 7, 2025).
[15] Apple Valley Pub. Hrg. Tr. at 34-36 (May 7, 2025).
[16] Apple Valley Pub. Hrg. Tr. at 42-51 (May 7, 2025).

- Jan Miller discussed and asked questions regarding the Office of the Attorney General's proposal.[17] She also asked whether the presentation slides could be sent to members and about the number of senior citizens served by the Cooperative.[18] She further asked for clarification around rate adjustments and the role of the public in a rate case.[19]

- Brian Rogers asked about capital expenses, special projects, and how Dakota Electric's rates compared to other utilities.[20] He also stated he understood expenses were increasing but noted that the increase was large and inquired whether more regular, gradual rate increases could be pursued to avoid a sudden increase.[21] Brian Rogers also commented on the Cooperative's good electric service quality.[22]

- Jodi Rogers recommended that the Cooperative be clearer about communicating the residential rate increase, rather than describing the averaged rate increase across all customer classes, which does not represent the full impact on residents.[23] She also questioned how taxes and downstream political organizations impact the requested rate increase.[24] She also asked about notices and requested they continue to be provided on paper.[25]

- Bobbie Halling asked about increases for overhead services and transformers and asked whether the Cooperative had plans to underground wire to reduce outages.[26]

- Elizabeth Nermoe shared her experiences trying to keep her electric bill lower through conservation and her concerns about the rate increase.[27] She also asked questions about the rate case process before discussing the notice of the hearing.[28]

5. Four commenters spoke at the Rosemount Public Hearing held on May 7, 2025:[29]

- Linda Johnson stated that solar farms had been represented to save money for members but that she doubted that had occurred and did not

[17] Apple Valley Pub. Hrg. Tr. at 52-53 (May 7, 2025).
[18] Apple Valley Pub. Hrg. Tr. at 54-56 (May 7, 2025).
[19] Apple Valley Pub. Hrg. Tr. at 59-61 (May 7, 2025).
[20] Apple Valley Pub. Hrg. Tr. at 61, 63-64 (May 7, 2025).
[21] Apple Valley Pub. Hrg. Tr. at 62-64 (May 7, 2025).
[22] Apple Valley Pub. Hrg. Tr. at 61-67 (May 7, 2025).
[23] Apple Valley Pub. Hrg. Tr. at 72 (May 7, 2025).
[24] Apple Valley Pub. Hrg. Tr. at 75-76 (May 7, 2025).
[25] Apple Valley Pub. Hrg. Tr. at 66-78 (May 7, 2025).
[26] Apple Valley Pub. Hrg. Tr. at 78-80 (May 7, 2025).
[27] Apple Valley Pub. Hrg. Tr. at 39-40, 58 (May 7, 2025).
[28] Apple Valley Pub. Hrg. Tr. at 39-41, 58, 81 (May 7, 2025).
[29] Rosemount Pub. Hrg. Tr. (May 7, 2025).

believe members were receiving savings from solar.[30] She also communicated her hope that Great River Energy would not invest in wind.[31] Later in the hearing, she asked if prices will ever go back down.[32]

- Andrew Wegener had comments about ways to keep the Cooperative's costs down, shared his concerns about increasing costs to charge his electric vehicle, and discussed the RTA changes.[33] He further shared his concerns about how Dakota Electric's rate increase information was presented in light of the Cooperative's Resource and Tax Adjustment.[34]

- Whitney Farra shared her concerns around data centers and the infrastructure increases that would be needed to serve them and how the cost of these increased energy needs would be distributed.[35] She stated that it is important to account for where the demand for energy is coming from and asked what studies were done to make sure community members are being accounted for as decisions are made.[36]

- Kim Bauer asked when a decision about the rate increase would be made.[37]

B. Written Public Comments Submitted to the Docket

6. Twenty-six individuals filed at least one comment in the docket. These public comments shared experiences, voiced concerns, asked questions, and requested the Commission focus on specific issues. Almost all comments opposed a rate increase or recommended a lower increase. Commenters shared concerns about Dakota Electric's Board of Director's expenses including the disclosure of those expenses.[38] Written comments called the rate increase "excessive,"[39] and shared concerns about how customers were benefiting from the additional revenue from the proposed increase.[40] A few commenters acknowledged the Cooperative facing rising costs and that rate increases are "occasionally necessary."[41]

[30] Rosemount Pub. Hrg. Tr. at 29-30 (May 7, 2025).
[31] Rosemount Pub. Hrg. Tr. at 30-31 (May 7, 2025).
[32] Rosemount Pub. Hrg. Tr. at 56 (May 7, 2025).
[33] Rosemount Pub. Hrg. Tr. at 34-41 (May 7, 2025).
[34] Rosemount Pub. Hrg. Tr. at 78-80 (May 7, 2025).
[35] Rosemount Pub. Hrg. Tr. at 46-48 (May 7, 2025).
[36] Rosemount Pub. Hrg. Tr. at 45-55 (May 7, 2025).
[37] Rosemount Pub. Hrg. Tr. at 53-54 (May 7, 2025).
[38] Comment of Gerald Brown (eDocket No. 20252-215452-01); Comment of Shannon Connor (eDocket No. 20254-218338-01).
[39] Comment of Robert Hansberry (eDocket No. 20253-216707-01).
[40] Comment of Madeline Baird (eDocket No. 20254-217367-01); Comment of Erik Peterman (eDocket No. 20254-217684-01); Comment of David Sutliff (eDocket No. 20254-218279-01).
[41] Comment of Dan Reitemeier (eDocket No. 20254-217769-01); Comment of Debra Benson (eDocket No. 20254-217684-01).

7. Customers' written comments also stated concerns around the Cooperative's transparency regarding the proposed rate increase.[42] Multiple commenters shared their concern about the burden placed on low-income customers and customers living on fixed incomes, including social security.[43] One commenter shared that he felt the Cooperative was asking middle-class users to accept a rate hike that exceeds both their annual wage increases and the general rise in living expenses.[44] Commenters also voiced concern about customers' lack of flexibility around energy use during peak periods.[45] Some commenters questioned the Cooperative's justification for the increase.[46] Some comments suggested ways to improve communications to members to improve transparency.[47] Further comments raised concerns about the mathematics, formulas, and the accuracy of what was shared with customers.[48] One commenter felt that investments in energy efficiency measures did not result in customer energy savings on bills.[49]

[42] Comment of Jon Derik Dautel (eDocket No. 20257-220861-01); Comment of Jon Derik Dautel (eDocket No. 20251-214674-01; Comment of Jon Derik Dautel (eDocket No. 20252-215152-01); Comment of Gerald Brown (eDocket No. 20252-215452-01); Comment of Robert Trier (eDocket No. 20253-216451-01); Comment of James Grams (eDocket No. 20256-219910-01).

[43] Comment of Jon Derik Dautel (eDocket No. 20251-214674-01); Comment of Jon Derik Dautel (eDocket No. 20257-220861-01); Comment of Kelly Sax (eDocket No. 20254-217578-01); Comment of Kelly Sax (eDocket No. 20254-217684-01); Comment of Dan Reitemeier (eDocket No. 20254-217684-01); Comment of Beverly Hueffmeier (eDocket No. 20254-218010-01).

[44] Comment of Jonathan Morrison (eDocket No. 20254-217921-01).

[45] Comment of Mary Nell Zellner (eDocket No. 20254-217579-01).

[46] Comment of Erik Peterman (eDocket No. 20254-217684-01); Comment of David Sutliff (eDocket No. 20254-218279-01); Comment of Shannon Connor (eDocket No. 20254-218338-01); Comment of Kelly Sax (eDocket No. 20254-217684-01).

[47] Comment of Dan Reitemeier (eDocket No. 20254-217769-01); Comment of David Sutliff (eDocket No. 20254-218279-01); Comment of Danielle Hirsch (eDocket No. 20255-218914-01); Comment of Danielle Hirsch (eDocket No. 20255-218914-01); Comment of James Grams (eDocket No. 20256-219910-01).

[48] Comment of Marten Kuebler (eDocket No. 20256-219967-01); Comment of Marten Kuebler (eDocket No. 20256-219987-01); Comment of Andrew Wegener (eDocket No. 20257-220591-01).

[49] Comment of David Sutliff (eDocket No. 20254-218279-01).

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CERTIFICATE OF SERVICE

I, Kristin M. Stastny, hereby certify that on the 15th day of August, 2025, on behalf of Dakota Electric Association, the Department of Commerce, Division of Energy Resources, and the Office of the Attorney General – Residential Utilities Division, I electronically filed a true and correct copy of the enclosed Summary of Public Comments on www.edockets.state.mn.us. Said document was also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 15th day of August 2025.

/s/ Kristin M. Stastny
Kristin M. Stastny

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Jorge	Alonso	jorge.alonso@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
2	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
3	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
4	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
5	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
6	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
7	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
8	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
9	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
10	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
11	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
12	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
13	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		Yes	24-400 Official CC Service List

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14	Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	24-400 Official CC Service List
15	Godwin	Ubani	godwin.ubani@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