



Your Touchstone Energy® Cooperative 

January 9, 2019

Daniel P. Wolf, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101-2147

***Subject: Dakota Electric Association Reply Comments
In the Matter of a Petition to Implement
Service Features Related to AGi Technology
Docket No. E-111/M-18-640***

Dear Mr. Wolf:

On October 11, 2018, Dakota Electric Association® (Dakota Electric® or Cooperative) submitted a petition requesting Minnesota Public Utilities Commission (Commission or MPUC) approval to implement certain service features related to Advanced Grid Infrastructure (AGi) technology including an advanced meter opt-out fee and modifying language related to load control receiver bypass.

On December 13, 2018, the Minnesota Department of Commerce (Department or DOC) submitted Comments in this matter.

Following is a summary of the DOC comments and recommendations and Dakota Electric's Reply Comments.

Department of Commerce Comments

The Department of Commerce conclusions and recommendations states:

The Department requests that Dakota provide a narrative clearly explaining and justifying each step and assumption in the opt-out calculation, address any other potential solutions for reading opt-out meters, and re-calculate the opt-out fee by backing out the provisional savings cost value approved in the AGi Rider.

At this time, the Department recommends that the Commission approve Dakota's proposal to amend the Section VI, Sheet 16 tariff language, and will provide supplemental comments regarding the opt-out proposal after reviewing Dakota Electric's reply comments.

Dakota Electric Reply Comments

Dakota Electric offers the following Reply Comments on the recommendation, observations, and requested information in the Minnesota Department of Commerce December 13 Comments.

Dakota Electric concurs with the DOC recommendation to approve Dakota Electric's proposal to amend general rules and policies tariff language for demand-side management programs on Section VI, Sheet 16 of the Cooperative's rate book.

Dakota Electric would like to provide clarification on some observations included in the Department's December 13 Comments:

- On Pages 2 and 3 the DOC states, "The Department notes that the current approved AGi Rider tariff reflects \$0.00 per-meter monthly charge, since Dakota has not yet submitted a petition to establish the monthly fee. As Dakota indicated in its initial filing in that docket, 'the proposed tracker recovery will take effect when investments are made in the proposed Advanced Grid Infrastructure'."
- The Department's observation is correct. The AGi Rider tariff presently reflects a \$0.00 per-meter monthly charge. The first installation of a test phase of automated meters will take place in 2019. Dakota Electric anticipates a filing to the Commission in early 2020 that will calculate and implement an AGi Rider fee related to these 2019 installations.
- On Page 3 the DOC states, "The Cooperative clarified that the AGi Rider would not be applicable to opt-out customers."
- Dakota Electric supports addition of the following wording to the Rate Clause in the proposed AMO Rider as included in our response to Department IR 1-1:
 - "Opt-Out Members will not be subject to charges under the Advanced Grid Infrastructure (AGi) Rider."

- On Page 3 the DOC states, “It appears to the Department, therefore, that the Cooperative is using the phrase “manual meter reading” to mean reading any non-AMI meter.”
 - This is correct.
- On Pages 3 and 4 the DOC states, “It is unfortunate that Dakota did not propose an opt-out choice when requesting approval of the AGi Rider and prior to AMI rollout so that customers could have been informed. If customers are aware of the option to opt out prior to AMI being installed, Dakota would not have to replace an opt-out customer’s meter twice – once to install AMI and again to replace it with a non-communicating meter.”
 - The AMI rollout has not taken place. As mentioned above, a test phase of meters will be installed in 2019. The full AMI rollout will then begin in 2020. Dakota Electric has submitted the present filing to receive Commission approval for an opt-out fee well in advance of the AMI rollout. Members will be fully informed about the opt-out fee in advance of their decision and Dakota Electric will not be in a position of installing a meter twice.
- On Page 4 the DOC states, “Opt-out provisions are more appropriately included within the AGi Rider, along with appropriate corresponding language adjustments to the applicability section, to ensure clarity. Should the Commission conclude that it is important to preserve a customer’s preference to not have AMI installed, the Department suggests that the AGi Rider be amended to add the opt-out provisions rather than creating a separate Advanced Meter Opt-Out Rider.”
 - Dakota Electric believes that two separate riders – AGi Rider and AMO Rider – provide better clarity to members, appropriately describe the basis and conditions for these two distinct charges, and accommodate different expected durations of the charges. As approved and proposed, the AGi Rider and the AMO Rider respectively identify distinct charges that will appear on member bills. The suggested combination does not add clarity. Each rider also clearly describes the conditions and basis for each charge. Finally, and most importantly, the expected duration of these two riders is not the same. The AGi Rider is intended to allow the Cooperative to recover net costs of installing AGi facilities between general

rate cases. At the present time, Dakota Electric anticipates filing a general rate case in 2019 and has a recent history of filing general rate cases about every five years. The AGi investment is planned to happen in the time frame between a 2019 rate case and a possible future filing five years later. After that subsequent rate case, it is expected that the AGi Rider and associated fees would not be needed. By comparison, the AMO Rider and proposed opt-out fee would apply well into the future for any members that choose to not have an AMI meter installed at their premise. So, even if the riders were combined today, they would then need to be reformatted in the future as we transition out of the fees associated with the AGi Rider.

- On Page 4 the DOC states, “Dakota’s proposed calculation of the opt-out fee attempted to capture the incremental costs of serving opt-out customers by backing out meter reading costs captured in base rates.”
 - This is correct.
- On Page 4 the DOC states, “However, the Cooperative backed out 2017 actual meter reading costs. Using 2017 actual costs rather than the relevant costs included in base rates to calculate an opt-out fee does not accurately capture incremental (to base rates) costs.”
 - The Department is correct. Our use of 2017 actual costs reflected our general understanding that present meter reading costs were very similar to costs included in the test year of our most recent general rate case. In response to Department IR 1-2 (attached), Dakota Electric provided an alternate analysis that removed meter reading costs included in the 2013 test year from our last general rate case. Our original filing based on 2017 meter reading costs calculated an overall opt-out cost of \$12.05 that we rounded down to a proposed opt-out fee of \$12.00 per month. In the alternate analysis using 2013 test year data, the overall opt-out cost is calculated at \$12.07, which we would still round down to a proposed opt-out fee of \$12.00 per month.
- On Page 4 the DOC states, “DEA should back out the equivalent of the total operations cost savings value captured in the AGi Rider.”

- The identification and calculation of incremental costs and savings for the proposed opt-out fee already include applicable net savings associated with installing an AMI system. The incremental cost analysis for the opt-out fee estimates the labor and vehicle costs to manually read meters where a member refuses the installation of an AMI meter along with the hardware and software costs required for manually reading meters. To these costs, credits are applied for the lower cost of a conventional meter compared to an advanced AMI meter and for the subtraction of current meter reading costs being recovered in base rates. The result is the additional costs the Cooperative will incur to read meters for members who refuse to have an AMI meter installed at their premise. The subtraction of current meter reading costs is the only operational cost savings that should apply to the opt-out fee calculation. Any other operational savings from AGi is only achieved because of members that participate in AGi and pay for AGi. As mentioned above, opt-out members will not be paying the AGi recovery fee.
- On Page 4 the DOC states, “Adjustments to the AGi and AMO monthly fees would occur simultaneously. Further, since operations expenses caused by opt-out customers may change each year (depending on the number of opt-out customers, particularly in the beginning years of the AGi Rider), customers could more easily compare changes in the AMO and AGi charges.”
 - Dakota Electric notes that the AGi recovery fee provides a bridge to recover net recoverable costs for AGi that occur between rate cases. At the present time it is expected that the AGi recovery would phase-out in a subsequent general rate case – which could possibly occur in 2024 if the Cooperative continues a five-year cycle with rate cases. Further, Dakota Electric anticipates that opt-out fees will be recalculated in general rate cases and not be subject to annual adjustment. Such a process provides certainty and stability for members. A concern would be a circumstance where the number of opt-out consumers declines each year, which would spread fixed costs for such service over fewer billing units. This could lead to dramatic fee increases. In any event, once the AGi recovery fee phases out there is nothing to compare with the opt-out fee.

- On Page 5 the DOC states, “Further, there may be other solutions to recovering meter reading costs depending on how many customers opt out. For instance, if only a handful of customers opt out, potentially those customers could self-read their meters with Dakota providing a meter read once per year (per Minnesota Rule 7820.3300).”
 - Dakota Electric appreciates the Department’s suggestion to explore other solutions for obtaining meter readings from opt out customers, depending on how many customers actually opt out. While the option of self-reading meters is appealing, it would also require internal processes and associated labor to coordinate activities such as the mailing of self-read cards to customers, gathering the cards each month for the various meter reading cycles, entering the data, establishing a process for estimated readings when cards are received late or not at all, and likely increases in member service calls. All of this must integrate smoothly with our billing process. These costs, for either a small handful of consumers or a larger group of opt out customers, could easily approach the amount of labor and support expenses we have included in our estimate of costs for the opt out fee. Dakota Electric believes that the best administrative and customer service approach is to pursue the AMO Rider and fee as we have proposed. We, of course, are always open to future process improvements if we identify changes that would benefit the Cooperative and our members based on actual experience.
- Finally, the Department makes the following recommendation at Page 6:

“The Department requests that Dakota provide a narrative clearly explaining and justifying each step and assumption in the opt-out calculation, address any other potential solutions for reading opt-out meters, and re-calculate the opt-out fee by backing out the provisional savings cost value approved in the AGi Rider.”

 - Dakota Electric provided a description of the opt-out fee analysis assumptions and related matters in response to Office of the Attorney General (OAG) information requests 002, 003, and 004 (attached). The incremental cost analysis for the opt-out fee estimates the labor and vehicle costs to manually read meters where a member refuses the installation of an AMI meter along with the hardware and software costs required for manually reading meters. To these costs, credits are applied for the lower cost of a conventional meter compared to an advanced AMI meter and for the subtraction of current meter reading costs being recovered in

base rates. The result is the additional costs the Cooperative will incur to read meters for members who refuse to have an AMI meter installed at their premise. The subtraction of current meter reading costs is the only operational cost savings that should apply to the opt-out fee calculation. Any other operational savings from AGi is only achieved because of members that participate in AGi and pay for AGi. As mentioned above, opt-out members will not be paying the AGi recovery fee.

- Based on the information provided in these Reply Comments, Dakota Electric asserts that the alternative opt-out fee calculation provided in response to Department IR 1-2 properly calculates the incremental cost associated with such opt-out service. It is not appropriate to include any other general AGi operational savings in the determination of the opt-out fee. As a matter of general business, those savings will accrue to the benefit of all members through rates once the AGi systems are fully deployed.

Dakota Electric believes that a self-read system is unsatisfactory for the reasons discussed above.

Conclusion

Dakota Electric appreciates the opportunity to provide Reply Comments in this matter. Based on the information in these Reply Comments, Dakota Electric continues to request Commission approval of the AMO Rider and fee as proposed in our October 11, 2018 filing. If you have any questions about these Reply Comments and recommendations, please contact me at 651-463-6258 or at dlarson@dakotaelectric.com.

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, Cherry Jordan, 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-18-640*

Dated this 9th day of January 2019

/s/ Cherry Jordan

Cherry Jordan

Dakota Electric Association

Response to

State of Minnesota
Department of Commerce
Division of Energy Resources

Utility Information Request

Docket Number: ***E-111/M-18-640***
Request Number: ***1-2***
Requested By: ***Danielle D. Winner***
Date of Request: ***November 6, 2018***
Response Prepared By: ***Doug Larson***
 Dakota Electric Association
 651-463-6258
Date of Response: ***November 16, 2018***

DOC No. 1-2

Please provide an Excel spreadsheet, formulae intact, of Dakota Electric Association's "Cost Analysis for Proposed Advanced Meter Opt Out Fee" (Cost Analysis) provided in the Cooperative's filing.

Answer

The requested electronic Excel spreadsheet from the filing is being provided via email transmission of this response.

We have also included an alternate spreadsheet (shown in a separate tab) that reflects 2013 test year meter reading costs.

Dakota Electric Association
Cost Analysis for Proposed Advanced Meter Opt Out Fee

Proposed Opt Out Fee

Self Contained Meter - One Person, one vehicle

Task	Item	Job Title	Hourly Rate	Hours	Overhead	Total
<u>Working hours</u>	Labor	Meter Reader	\$ 32.10	0.15	61.30%	\$ 7.77
	Mileage	7.50	miles	\$ 0.545	Rate	\$ 4.09
Subtotal						\$ 11.86

Reduction in Meter Cost

Cost of New Advanced Meter	\$ 110.00	
Cost of Current Meter	43.00	
Reduction in Cost	\$ (67.00)	
Life of Meter in Years	15	
Savings in Depreciation per Year	\$ (4.47)	
Months per year	12	
Savings per Month	\$ (0.37)	Subtotal \$ (0.37)

Hardware & Software Costs for Manual Reads

Itron - Quarterly Hardware Mtnce (3 devices)	# of Units	Quarterly Cost	Annual Cost
Handhelds	\$ 129.92		
Docks	\$ 53.99		
Hardware Maintenance	\$ 183.91	3 \$ 551.73	\$ 2,206.92
Itron - Software Mtnce		\$ 1,283.77	\$ 5,135.08

Total Annual Hardware & Software Costs \$ 7,342.00

Assumed Opt Out Count 500 \$ 14.68

Monthly Cost per Opt Out Subtotal \$ 1.22

Reduction of Current Meter Reading Costs

Total METRD Project 2017	\$ (833,600)	Meter Count 105,000	\$ (7.94)
Monthly Savings			Subtotal \$ (0.66)

Total \$ 12.05

Use \$ 12.00

ASSUMPTIONS

Meter Reader rate	\$ 32.10
IRS mileage rate	\$ 0.545
Overhead rate per 2014 rate case	61.3%
Miles traveled one way	7.5
Average speed in mph	30
Average speed in mpm	0.50
Minutes to destination	3.75
Minutes to read	5
Total minutes	8.75

Dakota Electric Association
Cost Analysis for Proposed Advanced Meter Opt Out Fee

Proposed Opt Out Fee

Self Contained Meter - One Person, one vehicle

Task	Item	Job Title	Hourly Rate	Hours	Overhead	Total
<u>Working hours</u>	Labor	Meter Reader	\$ 32.10	0.15	61.30%	\$ 7.77
	Mileage	7.50	miles	\$ 0.545	Rate	\$ 4.09
Subtotal						\$ 11.86

Reduction in Meter Cost

Cost of New Advanced Meter	\$ 110.00	
Cost of Current Meter	43.00	
Reduction in Cost	\$ (67.00)	
Life of Meter in Years	15	
Savings in Depreciation per Year	\$ (4.47)	
Months per year	12	
Savings per Month	\$ (0.37)	Subtotal \$ (0.37)

Hardware & Software Costs for Manual Reads

Itron - Quarterly Hardware Mtnce (3 devices)	# of Units	Quarterly Cost	Annual Cost
Handhelds	\$ 129.92		
Docks	\$ 53.99		
Hardware Maintenance	\$ 183.91	3 \$ 551.73	\$ 2,206.92
Itron - Software Mtnce		\$ 1,283.77	\$ 5,135.08

Total Annual Hardware & Software Costs \$ 7,342.00

Assumed Opt Out Count 500 \$ 14.68

Monthly Cost per Opt Out Subtotal \$ 1.22

Reduction of Rate Case Meter Reading Costs

2013 Test Year	\$ (792,264)	Meter Count 102,728	\$ (7.71)
Monthly Savings			Subtotal \$ (0.64)

Total \$ 12.07

Use \$ 12.00

ASSUMPTIONS

Meter Reader rate	\$ 32.10
IRS mileage rate	\$ 0.545
Overhead rate per 2014 rate case	61.3%
Miles traveled one way	7.5
Average speed in mph	30
Average speed in mpm	0.50
Minutes to destination	3.75
Minutes to read	5
Total minutes	8.75

NOTES:

2013 Test Year meter reading costs from Exhibit 3 Page 10 of 42 at Line 50.

Meter count is the 2013 Form 7 average number of consumers. (Workpaper 1 at Page 7)

Dakota Electric Association
Project Activity by Account

DOC Request: 1-2

Activity: METRD

YTD Through: 12 / 2013

<u>Account</u>	<u>Description</u>	<u>Actual \$</u>
81110	Salaries	5,896.86
81120	Wages	366,187.63
81125	Overtime	1,017.98
81199	Payroll Overheads	186,126.67
81230	Contract Help	165,388.45
81610	Education & Training Fees	0.00
82130	Engineer Fees	0.00
84110	Supplies-Office	29.03
84160	Office Equip & Software Maint	10,905.20
84310	UPS/Fed Express/Courier	22.16
84545	Meals	800.46
85130	Telephone & Cell Phone	12,340.25
85310	Building Maintenance	0.00
85440	Other Vehicle Expenses	319.95
85520	Small Truck & Auto Exp Cleared	20,739.00
86110	Distribution Mntnce Materials	3,138.55
86120	Distribution Supplies-Tool Room	0.00
86130	Distribution Supplies-Other	744.52
86145	Burden - Accounting Use Only	0.00
Totals		773,656.71

Prorated Rate Case Adj	18,607
FERC Account 902	792,264
	divided by
Average Meters 2013	102,728
Months	x12
Total Meter Readings	1,232,736
	=
Cost per meter read	\$.64

Dakota Electric Association

Response to

State of Minnesota
Office of the Attorney General

Utility Information Request

Docket Number: *E-111/M-18-640*
Request Number: *002*
Requested By: *Ian Dobson*
Date of Request: *November 8, 2018*
Response Prepared By: *Doug Larson*
Dakota Electric Association
651-463-6258
Date of Response: *November 21, 2018*

OAG No. 002

Reference: Cost Analysis provided by DEA in its initial filing.

Provide a detailed explanation of how the Company determined the following assumptions; show calculations as appropriate:

- 1) Opt-out count of 500.**
- 2) Meter count of 105,000.**
- 3) Mileage of 7.50.**
- 4) Overhead percentage of 61.30%.**

Answer

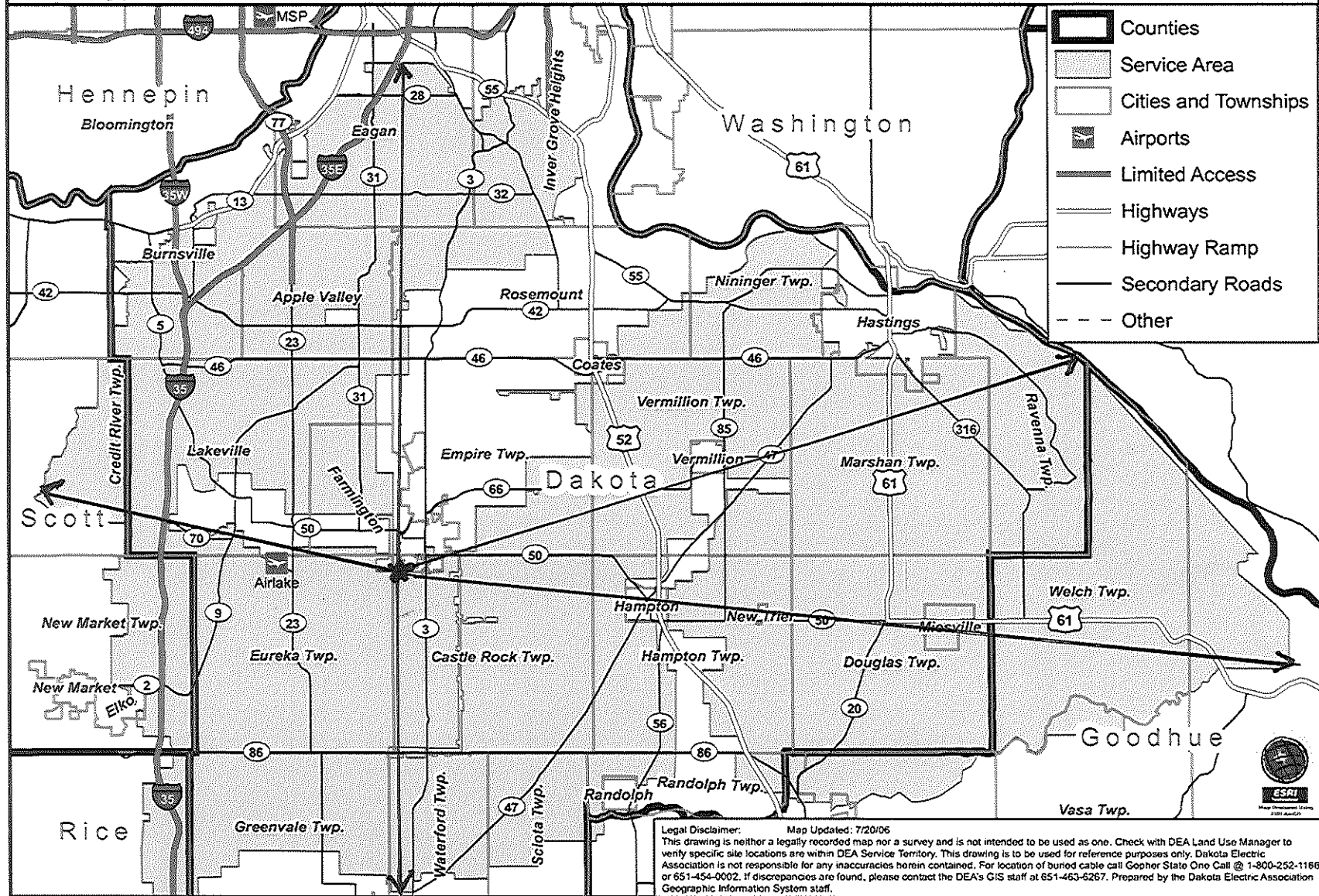
- 1) The assumption of 500 Opt Out Members is based on a consideration of opt out experience at other utilities. For purposes of this analysis, we have tended to estimate this number higher since the effect is to lower the calculated monthly costs for hardware and software for manual reads.
- 2) The meter count is based on Dakota Electric's consumer count of 105,329 at year-end 2017, which relates to the 2017 meter reading cost timeframe included in the analysis.
- 3) The mileage per meter read is an estimate. Dakota Electric's estimate was based on a consideration of the miles used to establish special fees and charges for meter tests at a customer's request and reconnect charges – both of which use 15 miles. Dakota Electric used half of this mileage (7.5 miles) for calculating the Opt-Out Fee. Beyond this initial information, Dakota Electric also evaluated distances from our headquarters. That is, we measured the distance to the edges of our service territory

and the average is 15.2 miles as the crow flies (see attached map), which is very close to the number used in the special fees and charges.

- 4) The overhead percentage reflects the percent of payroll from our last general rate case (Docket No. E-111/GR-14-482, Exhibit 10, Page 6 of 6) attributed to the following costs:

19.56%	Pension
5.51%	Savings 401k
7.65%	FICA Tax
0.76%	Life Insurance
1.68%	Worker's Compensation
12.90%	Medical Insurance
0.28%	State and Federal Unemployment
<u>12.93%</u>	<u>Vacation/Sick/Holiday</u>
61.27%	Payroll Overhead

We note that these same costs were used in the development of the special fees and charges approved in the rate case.



North - 14
East - 24
NEast - 19
West - 10
South - 9

Arg = 15.2

$$\star = \mathbb{H}Q$$
$$|m_i| = 1 \iff$$

Dakota Electric Association

Response to

State of Minnesota
Office of the Attorney General

Utility Information Request

Docket Number: *E-111/M-18-640*
Request Number: *003*
Requested By: *Ian Dobson*
Date of Request: *November 8, 2018*
Response Prepared By: *Doug Larson*
Dakota Electric Association
651-463-6258
Date of Response: *November 21, 2018*

OAG No. 003

Reference: Cost Analysis provided by DEA in its initial filing.

- 1) Explain whether the \$43 for “cost of current meter” is the current net plant value of meters, and provide how this amount is calculated and indicate where in the 2014 rate case the meter cost is reflected (specify the FERC accounts and schedules from the rate case).**
- 2) Explain whether or not the Company intends to replace these current meters with new meters (not under the AGi implementation) in the future and provide the timing of when this would likely occur.**
- 3) Explain whether or not the Company intends to retain current meters that are replaced under the AGi implementation, in order to be used as replacements in the future.**
- 4) Show the accounting transaction the Company will make when it removes current meters, replaced under the AGi implementation, from the books.**
- 5) Provide the In-service cost, accumulated reserve, and net book value as of 12/31/17.**
- 6) Explain if any current meters are fully depreciated.**

Answer

- 1) The “Cost of Current Meter” is the present cost of a residential meter.
In DEA’s last general rate case (Docket No. E-111/GR-14-482), the depreciated**

meters (FERC acct 370) for residential consumers was \$3,090,048 as shown on Exhibit 3, Page 19 of 42, Line 24. On a per residential member basis this translates to \$32.31 ($\$3,090,048 \div 95,623 = \32.31).

- 2) Dakota Electric intends to replace all meters under AGi implementation. This will provide consistency for our meters in service. For members selecting to Opt Out, we will either disable the communicating feature of the meter or install a meter without communicating features. The meter exchanges for the AGi project will begin to occur in late 2019 and continue through 2020 and into 2021. The replacement will be by area and we expect to have members request to opt-out during that meter exchange process.
- 3) No. See answer above.
- 4) We recently received Commission approval for new meter depreciation rates for existing meters. These rates accelerate the depreciation of meters in anticipation of the AGi project implementation. In conversations with the DOC during the AGi tracker recovery docket, we reached an understanding that this depreciation would remain in effect until all such meters are fully depreciated which is expected to be around the time of a future rate case for the Cooperative (2024?).
- 5) The requested numbers for residential meters in FERC account 370 as of 12/31/17 are as follows:

\$6,175,431	In-Service Cost
\$3,676,881	Accumulated Reserve
\$2,498,550	Net Book Value

- 6) Some meters are likely fully depreciated. However, the Cooperative uses mass asset accounting so individual meters are not tracked separately. In DEA's 2017 Depreciation Rate Study, we received approval to accelerate our depreciation rate for meters from 4% to 6.67% annually in anticipation of their replacement. Existing meters are currently scheduled to be fully depreciated in approximately six years.

Dakota Electric Association

Response to

State of Minnesota
Office of the Attorney General

Utility Information Request

Docket Number: *E-111/M-18-640*
Request Number: *004*
Requested By: *Ian Dobson*
Date of Request: *November 8, 2018*
Response Prepared By: *Doug Larson*
Dakota Electric Association
651-463-6258
Date of Response: *November 21, 2018*

OAG No. 004

Reference: Cost Analysis provided by DEA in its initial filing.

Clarify whether the Itron hardware is leased or owned. Indicate where in the 2014 rate case the meter cost is reflected (specify the FERC accounts and schedules from the rate case). If leased, explain why it wouldn't be owned.

Clarify whether the Itron software is leased or owned. Indicate where in the 2014 rate case the meter cost is reflected (specify the FERC accounts and schedules from the rate case). If leased, explain why it wouldn't be owned.

Answer

The Itron hardware is owned. These hardware costs were included in FERC account 902.

The Itron software is also owned. These software costs were included in FERC account 902.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 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	No	GEN_SL_Dakota Electric Association_General Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	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
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	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
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Dakota Electric Association_General Service List