



Your Touchstone Energy® Cooperative 

September 22, 2020

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

**Re: Dakota Electric Association
Petition Defining Availability of Temporary Service
Docket No. E-111/M-20-____**

Dear Mr. Seuffert:

Dakota Electric Association® (Dakota Electric® or Cooperative) submits the attached Petition requesting approval to limit the availability of temporary service extensions to commercial accounts only.

If you or your staff has any questions regarding Dakota Electric's petition, please contact me any time at (651) 463-6258 or 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
651-463-6258
dlarson@dakotaelectric.com

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

IN THE MATTER OF A
DAKOTA ELECTRIC ASSOCIATION PETITION
DEFINING AVAILABILITY OF TEMPORARY SERVICE

DOCKET No. E-111/M-20-____

SUMMARY

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

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Valerie Means
Matthew Schuerger
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

IN THE MATTER OF A
DAKOTA ELECTRIC ASSOCIATION PETITION
DEFINING AVAILABILITY OF TEMPORARY SERVICE

DOCKET No. E-111/M-20-____

PETITION OF DAKOTA ELECTRIC ASSOCIATION

I. Introduction

Dakota Electric Association® (Dakota Electric® or Cooperative) submits the following Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval to limit the availability of temporary service extensions to commercial accounts only.

II. Filing Requirements

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. Rule 7829.1300, Dakota Electric provides the following required general filing information.

1. Summary of Filing (Minn. Rule 7829.1300, subp.1)

A one paragraph summary accompanies this Petition.

2. Service on Other Parties (Minn. Rule 7829.1300, subp. 2)

Pursuant to Minn. Rules 7829.1300, subp. 2, Dakota Electric eFiles this Petition on the Minnesota Department of Commerce – Division of Energy Resources and the Office of Attorney General – Antitrust and Utilities Division. A summary of the filing prepared in

accordance with Minn. Rules 7829.1300, subp. 1 is being served on Dakota Electric's general service list.

3. Name, Address and Telephone Number of Utility (Minn. Rule 7829.1300, subp. 4(A))

Dakota Electric Association
4300 220th Street West
Farmington, MN 55024
(651) 463-6212

4. Name, Address and Telephone Number of Utility Attorney (Minn. Rule 7829.1300, subp. 4(B))

Eric F. Swanson
Winthrop & Weinstine
225 South Sixth Street, Suite 3500
Minneapolis, Minnesota 55402-4629

5. Date of Filing and Date Proposed Rate Takes Effect (Minn. Rule 7829.1300, subp. 4(C))

This Petition is being filed on September 22, 2020. Minn. Rule 7825.3200 requires that utilities serve notice to the Commission at least 90 days prior to the proposed effective date of modified rates. The proposed availability of temporary service will take effect upon Commission approval, but no sooner than December 21, 2020.

6. Statute Controlling Schedule for Processing the Filing (Minn. Rule 7829.1300, subp. 4(D))

This Petition is made pursuant to Minn. Stat. § 216B.16. Dakota Electric's filing falls within the definition of a "Miscellaneous Tariff Filing" under Minn. Rules 7829.0100, subp. 11. Minn. Rules 7829.1400, subp. 1 and 4 specify that comments in response to a miscellaneous filing be filed within 30 days, and reply comments be filed no later than 10 days from the expiration of the original comment period.

7. Utility Employee Responsible for Filing (Minn. Rule 7829.1300, subp. 4(E))

Douglas R. Larson
Vice President of Regulatory Services
Dakota Electric Association
4300 220th Street West
Farmington, MN 55024
651-463-6258
dlarson@dakotaelectric.com

8. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 4(F))

The proposed change to temporary service availability does not affect rates of the Cooperative. Dakota Electric proposes to make such temporary service extensions available only to commercial accounts receiving service under identified rate schedules.

The additional information required under Minn. Rule 7829.1300, subp. 4(F) is included throughout this Petition.

III. Petition

1. Temporary Service Installations

Temporary electric service installations are provided during periods of construction, remodeling, maintenance, repair, or demolition of buildings, structures, equipment, or similar activities when permanent electric service is not practical or feasible.

Dakota Electric's present description and charges for temporary service installations is contained in our Rate Book on Sheet 8 of Section VI (Revision 4 attached).

2. Dakota Electric Petition

Dakota Electric requests Commission approval of language that limits the availability of temporary service installations to identified commercial rate schedules. The proposed language in Revision 5 (redline and clean versions attached) states "Temporary service installation *for Schedules 41, 46, 54, 70, and 71* will be permitted ..." (proposed new language is shown in *italics*).

The primary impact of this change will be to exclude the provision of temporary service for residential installations. Dakota Electric is proposing this change for several reasons including:

- Residential installations are able to make a site ready for permanent electric service very early in the construction process.

- This is not the typical case for commercial installations, where the time to make a site ready for permanent service can take longer and the electric needs for temporary service are not the same as the final permanent electric service (e.g. single phase versus three phase service).
- When the Cooperative provides temporary electric service to a residential site it is typically used for a short time before we are asked to remove the temporary facilities and install permanent electric service.
 - Without temporary service installations available at residential construction sites, such locations are able to use portable generators to meet electric needs until the site is ready for permanent electric service to be installed.
- While the present temporary service conditions allow Dakota Electric to charge for all net costs associated with the temporary service, we find that this is an inefficient use of our labor resources when the temporary service to residential sites is used for short durations.
 - In recent years, Dakota Electric has provided temporary service installations to about 150 residential sites annually.

Conclusion

For the reasons stated herein, Dakota Electric respectfully requests that the Commission approve language that limits the availability of temporary service installations to identified commercial rate schedules.

Dated: September 22, 2020

Respectfully Submitted,

/s/ Douglas R. Larson

Douglas R. Larson
Vice President of Regulatory Services
Dakota Electric Association

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-20-____

Dated this 22nd day of September 2020

/s/ Cherry Jordan

Cherry Jordan

MEMBER SERVICE INFORMATION
TEMPORARY SERVICE

Temporary service installation will be permitted during the period of construction, remodeling, maintenance, repair, or demolition of buildings, structures, equipment, or similar activities. When installing temporary service to a member, Dakota Electric Association will require that the member bear the cost of the installation and removal of service in excess of any salvage realized.

The member receiving temporary service will be charged the regular rates applicable to the service rendered.

Dakota Electric Association may require that advance payment be made to cover the estimated cost of the temporary service.

MEMBER SERVICE INFORMATION
TEMPORARY SERVICE

Temporary service installation for Schedules 41, 46, 54, 70, and 71 will be permitted during the period of construction, remodeling, maintenance, repair, or demolition of buildings, structures, equipment, or similar activities. When installing temporary service to a member, Dakota Electric Association will require that the member bear the cost of the installation and removal of service in excess of any salvage realized.

The member receiving temporary service will be charged the regular rates applicable to the service rendered.

Dakota Electric Association may require that advance payment be made to cover the estimated cost of the temporary service.

MEMBER SERVICE INFORMATION
TEMPORARY SERVICE

Temporary service installation for Schedules 41, 46, 54, 70, and 71 will be permitted during the period of construction, remodeling, maintenance, repair, or demolition of buildings, structures, equipment, or similar activities. When installing temporary service to a member, Dakota Electric Association will require that the member bear the cost of the installation and removal of service in excess of any salvage realized.

The member receiving temporary service will be charged the regular rates applicable to the service rendered.

Dakota Electric Association may require that advance payment be made to cover the estimated cost of the temporary service.

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