Mary T. Buley 612.621.8302 - Direct mtbuley@otcpas.com

Certified Public Accountants & Consultants

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January 15th, 2021

Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place E, Suite 350 St. Paul, MN 55101-2147

Re: In the Matter of the Petition of Arrowhead Electric Cooperative for Designation as a Eligible Telecommunications Carrier Docket No:_____

Dear Mr. Seuffert:

Enclosed via efiling please find the Original Filing, Summary of Filing, and Petition for Designation as a Eligible Telecommunications Carrier, and Affidavit of Service in the above entitled Docket on behalf of Arrowhead Electric Cooperative.

Sincerely,

/s/ Mary T. Buley

Mary T. Buley Consultant on behalf of Arrowhead Electric Cooperative

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben Valerie Means Matthew Schuerger Joseph K. Sullivan John Tuma Chair Commissioner Commissioner Commissioner

In the Matter of the Petition of Arrowhead Electric MPUC Docket No.: Cooperative, Inc for Designation as a Eligible Telecommunications Carrier

ORIGINAL FILING

Arrowhead Electric Cooperative, Inc ("Arrowhead") requests the Minnesota Public Utilities Commission (the "Commission") for designation as a Eligible Telecommunications Carrier (ETC") for the Rural Digital Opportunity Fund ("RDOF") census blocks awarded to Arrowhead. All of the awarded RDOF census blocks are located in Arrowhead's service area. Arrowhead request ETC authority for remaining portions of its service area.

The filing includes the following attachments:

- Attachment 1One paragraph summary of the filing in accordance with Minn.Rules pt. 7829.1300.
- Attachment 2 Petition for Designation as a Eligible Telecommunications Carrier, which contains a description of the filing, the impact on Petitioner and affected ratepayers, and the reasons for the filings, provided in accordance with Minn. Rules pt. 7829.1300, subp. 4(F).

Attachment 3 Affidavit of Service.

In addition, the following information is provided, in accordance with Minn. Rules pt. 7829.1300, subp. 4:

Utility:	Arrowhead Electric Cooperative, Inc 5401 West Highway 61 PO Box 39 Lutsen, MN 55612
Date of Filing	January 15 th , 2021
Controlling Statute for Time in Processing the Filing	Minn. Rules pt. <u>7811.1400</u> , subp. 12

If additional information is required, please contact me at 651.621.8302.

/s/ Mary T. Buley

Mary T. Buley Consultant on behalf of Arrowhead Electric Cooperative, Inc.

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben Valerie Means Matthew Schuerger Joseph K. Sullivan John Tuma Chair Commissioner Commissioner Commissioner

In the Matter of the Petition of Arrowhead Electric Cooperative, Inc. for Designation as a Eligible Telecommunications Carrier

MPUC Docket No.:

SUMMARY OF FILING

Arrowhead Electric Cooperative, Inc. ("Arrowhead") requests the Minnesota Public Utilities Commission issue an order for designation as a Eligible Telecommunications Carrier (" ETC") for the Rural Digital Opportunity Fund Census Blocks awarded to Arrowhead and for the remaining portions of its service area.

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie Sieben Valerie Means Matthew Schuerger Joseph K. Sullivan John Tuma Chair Commissioner Commissioner Commissioner

In the Matter of the Petition of Arrowhead Electric Cooperative, Inc. for Designation as a Eligible Telecommunications Carrier MPUC Docket No.:_____

PETITION FOR DESIGNATION AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER

Arrowhead Electric Cooperative, Inc ("Arrowhead") participated in the Federal Communications Commission Rural Digital Opportunity Fund (RDOF) Phase 1 auction (Auction 904) and has been awarded census blocks in Minnesota. As a part of receiving the announced funding Arrowhead is required to be certified as a Eligible Telecommunications Carrier (ETC) in the census block awarded in the auction.¹ In addition, Arrowhead requests ETC authority in the remaining portions of its CLEC service area.

In support of its Petition, Arrowhead states as follows:

A. The legal name, address and telephone number of the Petitioner and its designated contact person are as follows:

Arrowhead Electric Cooperative 5401 West Highway 61 PO Box 39 Lutsen, MN 55612

Arrowhead is represented in connection with this petition by its consultant:

Mary T. Buley Olsen Thielen & Co., Ltd. 2675 Long Lake Road St. Paul, MN 55113 651.621.8302

B. The name and title of the officer or representative of Arrowhead authorizing this petition is John Twiest, Chief Executive Officer, whose signature appears at the end of this petition.

¹ See Exhibit 3 – List of RDOF Census Blocks

- C. The proposed effective date of designation of eligibility to receive Universal Service Support is immediately upon the Commission's issuance of an Order approving this Petition.
- D. The service area ("Proposed Service Area") includes the RDOF Census Blocks² and all of its CLEC exchanges for which ETC designation is sought, is set forth as following:

ILEC	Exchanges
CenturyLink (Formerly	Grand Marais, Silver Bay, Tofte
Qwest).	
CenturyTel d/b/a CenturyLink	Grand Marais (Formerly the Gunflint Trail rate center),
	Hovland

A map of the Proposed Service Area is attached as Exhibit 1.

E. Arrowhead's Petition for designation as a ETC for the Proposed Service Area is consistent with the public interest, convenience and necessity, and satisfies the requirements for receiving universal service support under state and federal law, for the following reasons:

ARROWHEAD POSSESSES THE INTENT AND CAPABILITY OF PROVIDING SERVICE UPON REASONABLE CUSTOMER REQUEST THROUGHOUT THE SERVICE AREA

<u>Arrowhead Regulatory Authority</u> – The certificate of authority currently held by Arrowhead Cooperative is as a CLEC in Minnesota. The Minnesota Public Utilities Commission in Docket No. 12-231 granted Arrowhead CLEC authority on April 20, 2012. Arrowhead's initial CLEC 911 Plan was approved by the Minnesota Public Utilities Commission on May 9, 2012 in Docket No. 12-307.

- 1. <u>Arrowhead's Facilities and Commitment to Serve</u> Arrowhead will provide broadband and voice telephone over fiber to the premises (FTTP). Arrowhead is committed to provide service to all customers making a reasonable request for service. Arrowhead certifies that it will: (a) provide service on a timely basis to requesting customers within the Service Area where Arrowhead's network already passes the potential customer's premises; and (b) provide service within a reasonable period of time, if the potential customer is within the Service Area but not passed by Arrowhead's current network facilities if service can be provided at reasonable cost by constructing network facilities.
- <u>Arrowhead's Basic Universal Service Offering</u> Arrowhead will provide voice telephony in the Service Area. The services arrowhead offers meet the Basic Local Service requirements under <u>Minn. Rule 7812.0600</u>. Arrowhead has the ability and

² See Exhibit 3

the intention to provide the voice telephony services required by 47 CFR § $54.101(a)^3$:

- Voice grade access to the public switched network or its functional equivalent;
- Minutes of use for local service provided at no additional charge to end users;
- Access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911
- Toll limitation for qualifying low-income consumers

The universal service offering will be made available throughout the Proposed Service Area upon its designation as an ETC. Arrowhead's tariffs address customer eligibility provisions and the availability of subsidies under the Lifeline program⁴ and the Minnesota Telephone Assistance Plan⁵. The applicable sections of Arrowhead's tariff are attached as <u>Exhibit 2</u>. Arrowhead is committed to providing the supported services throughout the Service Area to all customers who make a request for such services if service can be provided at reasonable cost by constructing network facilities. The local usage plans offered are comparable to those offered by the incumbent local exchange carriers. Arrowhead's local calling scope will mirror those of the ILECs and any mandatory Extended Area Service calling as part of the basic local service offering.

- 3. <u>Arrowhead's Advertising Plan</u> Arrowhead currently advertises its services through several different channels of general distribution, including newspaper, direct mail, and by the member newsletter entitled " The Highline By Line". Arrowhead will advertise the availability of its universal service offering throughout the Service Area through these same advertising channels it currently employs. In addition, the availability of the offering throughout the Proposed Service Area will be listed continuously on Arrowhead's web site: <u>https://www.aecimn.com/</u> .The service offering will also be published at least annually in the local newspaper, and will be posted at the Arrowhead's office in Lutsen.
- 4. <u>Arrowhead 10-Year Plan for Use of Universal Service Support</u> Arrowhead will receive Universal High Cost Support and Lifeline support to the extent it serves customers eligible for that program.
- 5. <u>Arrowhead's Ability to Remain Functional in Emergency Situations</u>. Arrowhead's network will remain functional in emergency situations:

Commercial power outage: The central office serving Arrowhead's customers is equipped with electrical generators and battery power supply to provide service in the event of a commercial power outage.

³ FCC Connect America Order 11-161 rel. November 18, 2011 at ¶ 76-81 discusses the changes to 47 CFR §

^{51.101} and the required voice service offerings

⁴ Arrowhead's Minnesota Intrastate Exchange Tariff Section 5, page 34

⁵ Arrowhead's MN Intrastate Exchange Tariff Section 5, page 34 and page 35

Network failure: The interoffice facilities serving the Service Area are on a diverse routed fiber optic ring, which if cut will be automatically rerouted.

Arrowhead complies with the Commission's Rules in Chapter <u>7810</u> establishing minimum standards on various operational matters, such as 7810.3900 (Emergency Operations); 7810.4900 (Adequacy of Service); and 7810.5300 (Dial Service Requirements).

- <u>Arrowhead's Satisfaction of Consumer Protection and Service Quality Standards</u> Arrowhead, is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection. Arrowhead's tariff has specific provisions outlining the following terms addressing consumer protection issues:
 - Deposit and guarantee requirements⁶
 - Customer Billing⁷
 - Appropriate handling of customer complaints and billing disputes⁸
 - Disconnection and notice requirements⁹

The specific provisions in Arrowhead's tariff, as well as the Commission's service quality rules by which Arrowhead is bound, will apply throughout the Proposed Service Area and assure a high level of service quality and consumer protection.

DESIGNATING ARROWHEAD AS A ETC IN THE PROPOSED SERVICE AREA WILL SERVE THE PUBLIC INTEREST

- 7. <u>Public Interest</u> Designation of Arrowhead as a ETC in the Proposed Service Area is in the public interest, as it provides qualifying customers a choice of service providers while retaining the Lifeline benefit.
- 8. <u>Superior Service Offering</u> Arrowhead believes its service offerings are superior to that received by the ILECs' customers in the Service Area.

Arrowhead believes customers will additionally benefit from choosing a locally owned and based cooperative which has demonstrated its commitment to, and success in, responding to the service needs of its residents.

9. <u>Affordability</u> – The local exchange services and broadband services offered to Arrowhead's customers are within the range of the announced FCC 2021 Annual Urban Rate Survey rates.¹⁰ Arrowhead's basic voice service offerings rates are identified in its Local Exchange Services¹¹ tariff. Arrowhead will provide the benefit of Lifeline discounts to qualifying subscribers.

⁶ Arrowhead Local Exchange Tariff, Section 2, page 10 and page 11

⁷ Arrowhead Local Exchange Tariff, Section 2, page 11

⁸ Arrowhead Local Exchange Tariff, Section 2, page 12

⁹ Arrowhead Local Exchange Tariff, Section 2, page 15 and 16

 $^{^{10}}$ WC Docket 10-9 , Wireline Competition Bureau and Office of Economics and Analytics Announcement, 11-30-20

¹¹ Arrowhead Local Exchange Tariff, Section 4, page 2

10. <u>Commitment to Service Quality</u> - As noted in Paragraph E.7 above, Arrowhead is a certified CLEC in Minnesota is subject to, and complies with, the Commission's Rules pertaining to service quality and consumer protection.

ETC CERTIFICATION

11. <u>Request for Certification</u> - Arrowhead requests that the Commission certify its use of support effective as of the date of Arrowhead's ETC designation for the Proposed Service Area.

CONCLUSION

12. Arrowhead meets the requirements of both state and federal laws and regulations for designation as an Eligible Telecommunications Carrier in the requested Proposed Service Area. Pursuant to <u>47 USC § 214(e)</u>, the Commission should designate Arrowhead as an Eligible Telecommunications Carrier for the Service Area. In so doing, the Commission will ensure that consumers in the Service Area have an opportunity to secure better and more reliable service at a rate equal to or less than that which they are currently paying. The consumers in the Service Area will benefit and the public interest will be served if Arrowhead's Petition is approved and it is designated as an ETC.

Therefore, Arrowhead respectfully requests that the Commission:

- A. Designate Arrowhead Electric Cooperative as a ETC for receipt of federal Universal High Cost Support and lifeline support with respect to the Service Areas specified in this Petition;
- B. For such other and further relief as the Commission may deem just and reasonable.

Dated: January 15th, 2021

By: /s/Mary T. Buley Mary T. Buley

CONSULTANT FOR ARROWHEAD ELECTRIC COOPERATIVE

VERIFICATION

The undersigned, John Twiest, Chief Executive Officer of Arrowhead Electric Cooperative, certifies that he has reviewed this Petition and the facts stated therein, of which he has personal knowledge, and that the same are true and correct to the best of his present knowledge and belief.

Respectfully submitted,

Arrowhead Cooperative

By: /s/ John Twiest

John Twiest Chief Executive Officer

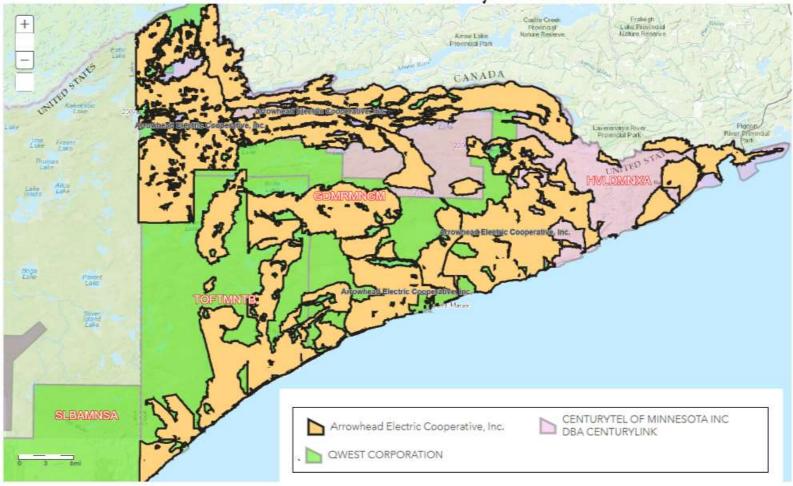
AFFIDAVIT OF SERVICE

In the Matter of the Petition of Arrowhead Electric Cooperative MPUC Docket No.:______ for Designation as an Eligible Telecommunications Carrier

I, <u>Mary T. Buley</u> state that on <u>January 15th</u>, 2021 I caused copies of the attached Notice regarding the filing of Arrowhead Electric Cooperative's application for designation as a Eligible Telecommunications Carrier to be filed using efile or email to the following persons:

Will Seuffert (efile)	Linda Chavez (efile)
Executive Secretary	Minnesota Department of Commerce
Jason Topp (email)	John Twiest (email)
CenturyLink and CenturyTel	Arrowhead Electric Cooperative

Arrowhead Electric Rural Digital Opportunity Fund Awarded Census Blocks Awarded by Wire Center



The tariff pages following address:

- Deposit and guarantee requirements
- Customer Billing
- Customer Complaints and Billing Disputes
- Disconnection and notice requirements
- Lifeline and MN TAP
- Link-Up
- Basic Local Service Rates

Deposit and Guarantee Requirements (cont.)

ARROWHEAD ELECTRIC COOPERATIVE, INC. LUTSEN, MINNESOTA Section 2 Page 10

GENERAL REGULATIONS

9. CREDIT POLICY

A. Deposit and Guarantee Requirements

The Company may require a deposit or guarantee of payment from any customer or applicant who has not established good credit with the Company. Deposit or guarantee of payment requirements as prescribed by the Company must be based upon standards which bear a reasonable relationship to the assurance of payment. The Company may determine whether a customer has established good credit with the Company, except as herein restricted:

- A customer, who within the last 12 months has not had his service disconnected for nonpayment of a bill and has not been liable for disconnection of service for nonpayment of a bill, and the bill is not in dispute, shall be deemed to have established good credit.
- 2) A Company shall not require a deposit or a guarantee of payment based upon income, home ownership, residential location, employment tenure, nature of occupation, race, color, creed, sex, marital status, age, national origin, or any other criteria which does not bear a reasonable relationship to the assurance of payment or which is not authorized by this chapter.
- 3) The Company shall not use any credit reports other than those reflecting the purchase of utility services to determine the adequacy of a customer's credit history without the permission in writing of the customer. Any credit history so used shall be mailed to the customer in order to provide the customer an opportunity to review the data. Refusal of a customer to permit use of a credit rating or credit service other than that of a Company shall not affect the determination by the Company as to that customer's credit history.
- Qualifying applicants for Lifeline Service may initiate service without paying a deposit if they voluntarily elect to have Toll Blocking on their line. Toll Blocking will be provided at no charge to Lifeline customers.
- B. Deposit

When required, a customer may assure payment by submitting a deposit. A deposit shall not exceed an estimated two months' gross bill or existing two months' bill where applicable. All deposits shall be in addition to payment of an outstanding bill or a part of such bill as has been resolved to the satisfaction of the Company, except where such bill has been discharged in bankruptcy. A Company shall not require a deposit or a guarantee of payment without explaining in writing why that deposit or guarantee is being required and under what conditions, if any, the deposit will be diminished upon return. The deposit shall be refunded to the customer after 12 consecutive months of prompt payment of all bills to that Company. The Company may, at its option, refund the deposit by direct payment or as a credit on the bill. With notice any deposit of a customer shall be applied by the Company to a bill when the bill has been determined by the Company to be delinquent. Each Company shall issue a written receipt of deposit to each customer from whom a deposit is received and shall provide a means whereby a depositor may establish a claim if the receipt is unavailable.

Customer Billing

ARROWHEAD ELECTRIC COOPERATIVE, INC. LUTSEN, MINNESOTA

Section 2 Page 11

GENERAL REGULATIONS

9. CREDIT POLICY (Continued)

B. Deposit (Continued)

Interest shall be paid on deposits in excess of \$20 at the rate set by the Commissioner of the Department of Commerce as required by Minnesota Statute 325E.02. The interest rate may be found on the Department of Commerce website at www.commerce.state.mn.us. Interest on deposits shall be payable from the date of deposit to the date of refund or disconnection. The Company may, at its option, pay the interest at intervals it chooses but at least annually, by direct payment, or as a credit on bills.

Upon termination of service, the deposit with accrued interest shall be credited to the final bill and the balance shall be returned within 45 days to the customer.

C. Guarantee of Payment

The Company may accept, in lieu of deposit, a contract signed by a guarantor satisfactory to the Company whereby payment of a specified sum, not exceeding the deposit requirement is guaranteed. The term of such contract shall be for no longer than 12 months, but shall automatically terminate after the customer has closed and paid the account with the Company, or at the guarantor's request upon 60 days' written notice to the Company. Upon termination of a guarantee contract or whenever the Company deems same insufficient as to amount or surety, a cash deposit or a new or additional guarantee may be required for good cause upon reasonable written notice to the customer.

The service of any customer who fails to comply with these requirements may be disconnected upon notice as prescribed in Minnesota Rules. The Company shall mail the guarantor copies of all disconnect notices sent to the customer whose account he has guaranteed unless the guarantor waives such notice in writing.

10. CUSTOMER BILLING

- A. Regular bills will be issued periodically (monthly, quarterly). For billing purposes each month is presumed to have thirty days.
- B. Special bills for long distance telecommunications service may be issued at any time when charges are unusually high and the Company is uncertain as to the customer's ability to pay such charges.
- C. Services which are charged for at monthly rates are billed in advance for one month's service.
- D. Services which are charged for at other than monthly rates are billed in arrears, except when payment for messages is made by cash deposit in the coin telephone.
- E. Detail call information, such as the time at which made, duration and destination may be provided for long distance telecommunications message service.
- F. Retroactive billing adjustments will not be made for a period exceeding three years.

11. PAYMENT FOR SERVICE

A. The customer is responsible for the payment of rates and charges for all services furnished including, but not limited to, calls originated or accepted at a customer's service location.

Customer Complaint and Disputes

ARROWHEAD ELECTRIC COOPERATIVE, INC. LUTSEN, MINNESOTA Section 2 Page 12

GENERAL REGULATIONS

11. PAYMENT FOR SERVICE (Continued)

- B. Bills are due when rendered and may be paid at any of the Company's public business offices or other authorized payment locations.
- C. Charges for a message originated or accepted at a coin telephone shall be paid by cash deposit in the coin telephone unless arrangements for billing have been made.
- D. Non-sufficient Fund or No Account Checks

When a customer pays the monthly bill with a non-sufficient fund or no account check, a charge (see Section 6, page 2) will be made to that customer to cover the administrative costs incurred in handling the transaction.

E. Customer Complaints and/or Billing Disputes

Customer inquiries or complaints regarding service or accounting may be made in writing or by telephone to the Company at:

5401 West Highway 61 PO Box 39 LUTSEN, MINNESOTA, 55612 (218) 663-7239 or (800) 864-3744

Any objection to billed charges should be reported promptly to the Company. Adjustments to Customers' bills shall be made to the extent that records are available and/or circumstances exist which reasonably indicate that such charges are not in accordance with approved rates or that an adjustment may otherwise be appropriate. Where overbilling of a subscriber occurs, due either to Company or subscriber error, no liability exists which will require the Company to pay any interest, dividend or other compensation on the amount overbilled.

If after an investigation and review by the Company a disagreement remains as to the disputed charges, the customer may file a complaint, in writing or by telephone, to the Minnesota Public Utilities Commission at:

121 Seventh Place East Suite 350 Saint Paul, Minnesota 55101–2147 (800) 657-3782

12. FAILURE TO PAY FOR SERVICE

- A. Regular Monthly Bills
 - A customer is considered to be delinquent in the payment of a regular monthly bill when the sum due is not received on or before the tenth calendar day following the day the bill is either mailed or delivered by other means.
 - When a customer is delinquent in the payment of a regular monthly bill, the Company
 may disconnect the service not sooner than five days after mailing or delivery of written
 notice of intention to disconnect.
- B. Special Bills
 - A customer is delinquent in the payment of a special bill when the sum due is not paid upon presentation.

Disconnection and notice requirements

24. TERMINATION OF SERVICE

- A. Service may be terminated prior to the expiration of the minimum contract period upon notice being given to the Company in advance and upon payment of the termination charges given below in addition to all charges due for service which has been furnished.
 - In the case of service for which the minimum contract period is one month, the termination charges are the charges due for the balance of the initial month.
 - 2) In case of additional directory listings and Joint User Service, where the listing has appeared in the directory, the termination charges are the charges due to the end of the directory period. In the following cases, however, charges will continue only to the date of termination of the extra listing or Joint User Service, subject to a minimum charge for one month:
 - a. The contract for the main service is terminated.
 - b. The listed party or joint user becomes a customer to telephone exchange service.
 - c. The listed party moves to a new location.
 - d. The listed party or joint user dies.

Section 2 Page 16

GENERAL REGULATIONS

24. TERMINATION OF SERVICE (Continued)

- 3) In the case of special equipment for which the minimum contract period is in excess of one month at the same location, such proportion of the sum of the cost of the equipment and of its installation, plus the cost of removal, less the salvage value of the equipment removed, as the unexpired portion of the minimum contract period bears to the full minimum contract period.
- B. Service may be terminated after the expiration of the minimum contract period, upon the Company being notified in advance and upon payment of all charges due to the date of termination of the service.
- C. Telecommunications service will not be disconnected on any Friday, Saturday, Sunday, or legal holiday, or at any time when the company's business offices are not open to the public, except where an emergency exists.

25. DISCONNECTION OF SERVICE

- A. The company may discontinue service to a customer without notice under the following conditions:
 - 1) In the event of tampering with the company's equipment;
 - In the event of a condition determined to be hazardous to the customer, to other customers of the company, to the company's equipment, the public, or to employees of the company; or
 - In the event of a customer's use of equipment in such a manner as to adversely affect the company's equipment or the company's service to others.
- B. The company may discontinue telecommunications service to a customer under the following conditions after giving customer five (5) days' (excluding Sundays and legal holidays) notice:
 - 1) For failure of the customer to pay a bill for service when due;
 - 2) For failure of the customer to meet the company's deposit and credit requirements;
 - 3) For failure of the customer to make proper application for service;
 - 4) For customer's violation of any of the company's rules on file with the Commission;
 - For failure of the customer to provide the company reasonable access to its equipment and property;
 - For customer's breach of the contract for service between the company and the customer;
 - For a failure of the customer to furnish such service, equipment, and/or rights-of-way necessary to serve said customer as shall have been specified by the utility as a condition of obtaining service; or
 - When necessary for the utility to comply with any order or request of any governmental authority having jurisdiction.

ARROWHEAD ELECTRIC COOPERATIVE, INC. LUTSEN, MINNESOTA	Section 5 Page 34 Revision 1
GENERAL SERVICES	
LIFELINE AND MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP)	
Lifeline, also known as Federal Lifeline Credit, is a federally sponsored assist described in 47 CFR §54.401 et al and is designed to make telephone service accel low income residential households.	tance program as (T) essible to qualifying (T)
TAP is a state sponsored assistance program under Minnesota Statutes Chapter 237 and telephone service accessible to qualifying low-income residential households. Through the households will receive a monthly discount on their telephone service.	is designed to make
1. Eligibility Requirements for Lifeline and TAP	
 a. A Lifeline customer may only receive assistance for one wireline or one w residential household. b. Applicant completes document and provides evidence that (1) the applicant n criteria at or below a135 percent of the Federal Poverty Guidelines or (2) partici of the following programs as defined by 47 CFR 54.409: 	meets income based
 Medicaid Supplemental Nutrition Assistance Program (SNAP) Supplemental Security Income (SSI) Federal Public Housing Assistance (FPHA) Individuals who do not qualify under any of the above but live on or near a freservation may qualify if the applicant receives benefits from at least one of the Bureau of Indian Affairs (BIA) General Assistance Tribally Administered Temporary Assistance for Needy Families (Tribal TAN Tribal Head Start (only households that meet the income qualifying standard Food Distribution Program on Indian Reservations (FDPIR) 	e following programs:
C. The applicant must sign a document certifying under penalty or perjury that income requirements or receives benefits from one of the above programs liste program or programs from which the consumer receives benefits. In addition to applicant must provide proof of income eligibility or proof of receipt of benefits programs. Acceptable documentation is outlined in Code of Federal Regulati Telecommunications Part 54.410	ed and identifying the o the certification the from the program or

Lifeline and MN TAP

d. The applicant signs a document agreeing to notify the carrier if that consumer ceases to participate in the program or programs. When the company is notified by the customer that the customer no longer participates in one of the above programs, the federal credits to that customer's monthly charges shall cease beginning with the start of the billing cycle beginning in the month after the month in which notification is received.

Exhibit 2 Selected Arrowhead Tariff Sections

		I, MINNESOTA GENERAL SERVICES	Page 35 Revision 1	
LIF	ELIN	E AND MINNESOTA TELEPHONE ASSISTANCE PLAN (TAP) (Conti	nued)	
2.	Elig	gibility Revocation		
	As: cus ass	he telephone company discovers that conditions exist that disqualify the sistance, the consumer will be de-enrolled from the Lifeline Assist stomer will be billed retroactively to whichever is the most recent sistance commenced or the recipient no longer qualified for the servenths.	ance program. The of the dates Lifeline	(
3.	Elig	gibility for the State TAP Credit/Federal Lifeline Credit:		
	a.	The state TAP credit and the Lifeline Credit is only available to reside meet the eligibility requirements listed above. For the TAP credit the in Minnesota.		(T)
				(D
4.	Ap	plication of the State TAP and Lifeline Credits		
	a. b.	TAP Customers are eligible for TAP a credit Lifeline Credit	See Note 1. See Note 2.	(T (T
5.	Re	gulations		
	a.	The state TAP credit will begin at the customer's earliest possible bil than the second billing cycle after the date the application for the Fed TAP credit is received by the telephone company.		
	b.	The service charge shall not be billed to establish qualification for sta	ate TAP credit.	
	C.	When a customer enrolls for state TAP credit, the Company is reim the service order activity.	bursed for the cost of	
6.	Fu	nding		
		e state TAP credit shall be funded through the state Telephone Assist residence and business access lines which pay the 911 surcharge.	ance Plan Surcharge	
7.	Ra	tes		
	Info	te 1: The State TAP Credit is the effective rate ordered by the Minnesota Publi ormation regarding the Credit rate can be assessed at the Minnesota Dep bsite at <u>http://mn.qov/commerce/</u>		(T)
	Cor	te 2: The Federal Lifeline Credit is the effective rate ordered by the Ferminission (FCC). Information regarding the credit rate can be assessed a c://www.fcc.gov/		(T)
			Effective: 2-11-2020	

Lifeline and MN TAP (cont.)

Basic Local Service Rates

ARROWHEAD ELECTRIC COOPERATIVE, INC. LUTSEN, MINNESOTA	Section 4 Page 2	
LOCAL EXCHANGE SERVICE	Revision 1	
Rates		
Exchanges – Grand Marais, Hovland, Tofte, and Silver Bay##		
Class of Service	Monthly Rates#	
BUSINESS: One Party PBX Trunk Basic Coin Telephone Service	\$29.99 29.99 N/A	(R)
RESIDENCE: One Party	15.99	
SCHOOL CLASSROOM SERVICE (see Sec. 5)	15.99	 (R)

All rates are billed in advance. Payment for service is due when the statement is rendered. ## Limited to customers located in Company's authorized service area.

Auction_id	bidder	block_id	state	county
904	Arrowhead Electric Cooperative, Inc.	270314801001007	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001175	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001378	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001383	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001403	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001406	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001416	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001417	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001419	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001420	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001421	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001423	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001425	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001426	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001428	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001431	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001433	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001444	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001445	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001447	MN	Cook
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904	Arrowhead Electric Cooperative, Inc.	270314801001467	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001476	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001483	MN	Cook
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904	Arrowhead Electric Cooperative, Inc.	270314801001504	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001507	MN	Cook
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904	Arrowhead Electric Cooperative, Inc.	270314801001514	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001523	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001570	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001572	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801001583	MN	Cook

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904	Arrowhead Electric Cooperative, Inc.	270314801001584	MN	Cook	
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904	Arrowhead Electric Cooperative, Inc.	270314801001688	MN	Cook	
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904	Arrowhead Electric Cooperative, Inc.	270314801002270	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002272	MN	Cook	
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		Arrowhead El	ectric R	DOF Cens	us Blo
904	Arrowhead Electric Cooperative, Inc.	270314801002273	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002274	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002275	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002276	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002277	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002279	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002280	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002284	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002285	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002286	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002287	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002288	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002289	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002290	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002294	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002295	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002297	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002300	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002302	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002307	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002308	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002309	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002311	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002312	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002315	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002320	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002321	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002322	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002323	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002326	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002328	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002329	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002336	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002337	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002338	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002350	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002355	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002365	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002366	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002368	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002369	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002372	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002380	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002384	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002388	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002389	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002390	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002391	MN	Cook	

		Arrowhead El	ectric R	DOF Cens	sus Blo
904	Arrowhead Electric Cooperative, Inc.	270314801002396	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002397	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002399	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002405	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002406	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002407	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002408	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002414	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002416	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002419	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002420	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002421	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801002423	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003000	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003002	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003005	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003007	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003012	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003014	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003015	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003038	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003039	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003040	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003063	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003075	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003091	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003104	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003105	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003107	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003109	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003110	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003123	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003129	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003168	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003175	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003176	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003179	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003183	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003191	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003195	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003200	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003203	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003204	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314801003210	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314801003215	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003216	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314801003290	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314801003327	MN	Cook	
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		Arrowhead Ele	ctric RD	OF Census Blo
904	Arrowhead Electric Cooperative, Inc.	270314801003332	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003340	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003351	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003356	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003362	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003375	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003376	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003389	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003390	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003409	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003412	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003417	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003421	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003432	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003434	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003435	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003437	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003439	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003441	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003442	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003443	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003444	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003445	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003446	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003449	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003450	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003451	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003453	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003462	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003464	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003467	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003470	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003472	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003478	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003481	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003486	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003487	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003491	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003502	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003515	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003527	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003528	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003529	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314801003558	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314802001000	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314802001001	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314802001002	MN	Cook
904	Arrowhead Electric Cooperative, Inc.	270314802001005	MN	Cook
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		Arrowhead El	ectric R	DOF Cens	us Blo
904	Arrowhead Electric Cooperative, Inc.	270314802001006	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001007	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001014	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001015	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001017	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001019	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001020	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001022	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001023	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001024	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001025	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001026	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001027	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001029	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001030	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001033	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001035	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001038	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001042	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001048	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001052	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001055	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001056	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001057	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001058	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001059	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001061	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001063	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001067	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001068	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001069	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001070	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001071	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001072	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001073	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001075	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001076	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001077	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001078	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001079	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001080	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001081	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001082	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001082	MN	Cook	
904	Arrowhead Electric Cooperative, Inc.	270314802001083	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001084	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001080	MN	Cook	
904 904	Arrowhead Electric Cooperative, Inc.	270314802001090	MN	Cook	
504		270314002001032		COOK	

904	Arrowhead Electric Cooperative, Inc.
904	Arrowhead Electric Cooperative, Inc.

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270314	802001093	MN	Cook
270314	802001094	MN	Cook
270314	802001095	MN	Cook
270314	802001098	MN	Cook
270314	802001099	MN	Cook
270314	802001100	MN	Cook
270314	802001101	MN	Cook
270314	802002003	MN	Cook
270314	802002004	MN	Cook
270314	802002005	MN	Cook
270314	802002046	MN	Cook
270314	802002056	MN	Cook