



Your Touchstone Energy® Cooperative 

March 29, 2021

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

**Re: Dakota Electric Association Petition to Clarify
Special Fee and Charges Language Applicable to Situations where
Meters are Removed without Authorization
Docket No. E-111/M-21-___**

Dear Mr. Seuffert:

Dakota Electric Association® (Dakota Electric® or Cooperative) submits the attached petition requesting approval to clarify language on the Special Fees and Charges tariff to recover costs for the Cooperative to respond to situations where meters are removed without authorization.

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
PETITION TO CLARIFY SPECIAL FEES & CHARGES
FOR METERS REMOVED WITHOUT AUTHORIZATION

DOCKET No. E-111/M-21-____

SUMMARY

On March 29, 2021, Dakota Electric Association® (Dakota Electric® or Cooperative) submitted a Petition to the Minnesota Public Utilities Commission (Commission or MPUC) requesting approval to clarify language on the Special Fees and Charges tariff to recover costs for the Cooperative to respond to situations where meters are removed without authorization.

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
PETITION TO CLARIFY SPECIAL FEES & CHARGES
FOR METERS REMOVED WITHOUT AUTHORIZATION

DOCKET No. E-111/M-21-____

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 clarify language on the Special Fees and Charges tariff to recover costs for the Cooperative to respond to situations where meters are removed without authorization.

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 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 March 29, 2021. 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 modification to the Special Fees and Charges will take effect upon Commission approval, but no sooner than June 28, 2021.

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))

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Vice President of Regulatory Services
Dakota Electric Association
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8. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 4(F))

The petition will allow the Cooperative to recover costs for responding to a situation where a meter is removed without authorization. The Cooperative has already communicated to electricians and contractors that meters must not be removed. This is a safety concern. The Cooperative is available to remove meters when required for work to be performed

safely at a location. Our intent is that, through communication with electricians and contractors, we never have to impose this charge. The proposed language will allow recovery of Cooperative costs in those situations where meters are removed, and the Cooperative is made aware of the removal through automated metering equipment, and the Cooperative responds to ensure equipment is safe and functioning properly.

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

III. Petition

The Advanced Grid Infrastructure Rider, approved by the Minnesota Public Utilities Commission on May 8, 2018, in Docket No. E-111/M-17-821, allows Dakota Electric to recover certain net distribution grid modernization and load management investments that occur between Cooperative general rate cases. Advanced Grid Infrastructure (AGi) is the term Dakota Electric uses to refer to new technologies that would enhance the communication and operation of our distribution system that delivers electricity to our members. These technologies will help Dakota Electric monitor our distribution system for better efficiency and operation and allow us to have two-way communication to field equipment, providing numerous benefits to our members and Dakota Electric. The main AGi components include Advanced Metering Infrastructure (AMI), Meter Data Management (MDM), and the Load Management (LM) system. Advanced Metering Infrastructure is the foundational component of the Advanced Grid functions. AMI is a system wide communication network for meters and other devices. AMI provides a communication path which can be used to read meters, control loads within the Load Management system, and interface with the SCADA (Supervisory Control And Data Acquisition) system for distribution operations and monitoring.

In 2019, Dakota Electric and our contracted vendors initiated several steps in the process of implementing AGi. In 2020, Dakota Electric completed the performance acceptance program and began widespread meter and load control receiver installations. Installations will continue throughout 2021.

With this broader implementation of automated metering and communication equipment, Dakota Electric is now instantaneously made aware of situations where electricians or contractors temporarily remove a meter to perform certain work at the site, without notifying the Cooperative. Prior to having this technology, Dakota Electric was only aware that a meter had potentially been removed when a physical inspection at the site revealed that a meter seal had been cut or removed.

Removing meters from meter sockets poses potentially significant public safety concerns. Dakota Electric has established operating guidelines to prevent members, contractors, or other personnel from engaging in tampering and or power diversion activities. Engaging in these activities is illegal and will negatively impact safety and service reliability. Some of the highest calculated levels of ARC Flash energy on the Dakota Electric electrical system can be found within a member owned meter socket. Therefore, removing a Dakota Electric owned meter from an energized member owned socket can be an extremely dangerous and unsafe activity. To minimize this risk, only qualified and properly trained Dakota Electric employees and Dakota Electric Contractors with proper personal protective equipment (PPE) may disconnect a service by removing a meter. In addition, the unexpected removal of a meter will create an outage in the outage management system, loss of communication to the meter, and the possibility of a distribution system operator falsely dispatching a crew to the outage location.

Dakota Electric's meters are available with different features and operated at multiple voltage levels and/or amperage ratings with or without the use of instrument transformation. Each of these site-specific characteristics present different challenges when removing or installing a meter to initiate a service disconnect or reconnect. For this reason, it is important to schedule the removal of any Dakota Electric owned meter with the Cooperative's Control Center. A properly coordinated disconnection of service ensures both a safe disconnection/reconnection process and maintains highly reliable service for the member. With a minimum of 48 hours (2 business days) notice and pending crew availability, Dakota Electric will provide a disconnect and/or reconnect service upon request. If this service is performed during normal business hours, Monday through Friday 7:00 AM to 3:30 PM, no charge is administered to the member or requesting party. If the

disconnect and/or reconnect service is requested or scheduled outside of normal business hours, a charge for the service will apply.

Dakota Electric proposes to clarify the wording in the Cooperative's Special Fees and Charges to cover situations where the system operator dispatches a crew to an outage location, only to discover that the source of an outage was an unauthorized removal of the meter. Dakota Electric proposes to modify wording on the Special Fees and Charges tariff sheet Section V, Sheet 45, Revision 9 (redline and clean versions attached) to read:

8. Member Contracted or Service Integrity Hourly Work

Dakota Electric is periodically asked to perform on-site service work. Such services will be provided at a pre-arranged hourly rate. Service Integrity includes repairs such as resealing a meter socket after an unauthorized removal of a meter, which will be billed at actual cost incurred.

Dakota Electric has, and will continue to, communicate and educate electricians and contractors about the dangers of removing meters and the proper process to arrange for the Cooperative to remove a meter. This proposed language will allow Dakota Electric to recover the costs of responding to these situations, based on our actual costs incurred.

Conclusion

Based on the information contained in this filing, Dakota Electric respectfully requests that the Commission approve clarifying language to the Special Fees and Charges tariff to recover costs for the Cooperative to respond to situations where meters are removed without authorization.

Dated: March 29, 2021

Respectfully Submitted,

/s/ Douglas R. Larson

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

Certificate of Service

I, Melissa Cherney, 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-21-__

Dated this 29th day of March 2021

/s/ Melissa Cherney

Melissa Cherney

SPECIAL FEES OR CHARGES

1. Meter Test at Member's Request
 - Single Phase\$95.00
 - Three Phase\$110.00
2. Bad Check\$11.50
3. Reconnection Charge (after disconnect, same consumer)
 - a. Self-contained Metering (one person, one vehicle)
 - 1) Working hours\$55.00
 - 2) Outside normal working hours.....\$145.00
 - b. Current Transformer-rated Metering (two-person crew, one truck)
 - 1) Working hours\$185.00
 - 2) Outside normal working hours.....\$340.00
4. Service Charge
(outside normal working hours when problem is not with Association's equipment)
Two-person crew, one truck\$340.00
5. Load Management Service Charge
(when problem is not with Association's equipment)
 - 1) Working hours.....\$80.00
 - 2) Outside normal working hours.....\$160.00
6. Pulse Meter (materials and installation)\$850.00
7. Transfer/Connection Charge.....\$17.50
8. Member Contracted or Service Integrity Hourly Work
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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