



September 29, 2025

Sasha Bergman, Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, MN 55101-2147

**Subject: *Dakota Electric Association Compliance Filing in Response to August 26, 2025 Order***

***In the Matter of Cold Weather Reports (CWR)—Regulated Gas and Electric Companies  
Docket No. E,G999/PR-25-2***

Dear Ms. Bergman:

Dakota Electric Association (Dakota Electric or Cooperative) respectfully this compliance filing in response to the Minnesota Public Utilities Commission's (Commission) August 28, 2025 Order Requiring Additional Filings and Other Actions (Order) in the above referenced docket. Dakota Electric notes that the Commission's ordering points reference "rate-regulated public utilities." The Cooperative is not a public utility as defined in Minnesota Statute 216B.02, subd. 4, but we are rate-regulated through a member vote as defined in Minnesota 216B.026. We believe the Commission is interested in the Cooperative's policies on these matters and provides our response to each relevant ordering point below.

1. *Rate-regulated public utilities that have not already done so must submit a compliance filing within 30 days in this docket detailing their current policies and practices on disconnections, service deposits, and payment agreements.*

The Cooperative's policies and practices regarding disconnections, service deposits, and payment arrangements were discussed in our June 27, 2025 Comments in the above

referenced docket. As noted in those comments, Dakota Electric's disconnection, service deposits, and payment arrangement policies are detailed in our Commission approved tariff at Section VI, Sheets 12.1, 13, 13.1, 14.0-14.5, and 15.<sup>1</sup>

3. *Rate-regulated public utilities must file in Docket No. E,G-999/PR-YR-2 updated disconnection, service deposit, and payment agreement policies and practices whenever those policies or practices change.*

Dakota Electric will make any required filings in this docket whenever changes occur. As noted in our June 27, 2025 Comments, Dakota Electric agreed in our pending rate case settlement to work with interested parties on modifications to parts of our disconnection and reconnection policy.

4. *Each rate-regulated public utility that requires down payments or service deposits must include an explanation of how those amounts are determined with its required monthly Residential Customer Status Report filings in Docket No. E,G-999/PR-YR-2.*

Dakota Electric will provide this information in the monthly Residential Customer Status Report filing.

5. *Rate-regulated public utilities must submit customer-facing language on disconnection, deposit, down payment, and payment arrangement to the CAO for review and approval.*

Dakota Electric is preparing information and will provide it to the CAO for their review.

6. *Rate-regulated public utilities must display on their respective websites and in printed disconnection communication materials CAO-approved language describing their disconnection, service deposit, and payment agreement policies and practices. Printed disconnection communication materials must describe disconnection, service deposit, and payment agreement policies and practices.*

As noted in our June 27, 2025 Comments, Dakota Electric is in the process of making adjustments to our website and the presentation of our tariff that we believe will

---

<sup>1</sup> Dakota Electric June 27, 2025 Comments in Docket No. E,G999/PR-25-2.

improve member access to this information. We will incorporate these requirements into our website changes and to any printed materials.

7. *Rate-regulated public utilities must detail in their next Residential Customer Status Report the average down-payment amount received from customers—both as a percentage of arrears and as a total dollar value—during CWR and non-CWR months.*

Dakota Electric will provide this information in its next Residential Customer Status Report filing.

Dakota Electric respectfully requests that the Commission accept this compliance filing, and its representatives are available to answer any questions that the Commission may have.

Sincerely,

*/s/ Adam Heinen*

Adam Heinen

Vice President of Regulatory Services

651-463-6258

aheinen@dakotaelectric.com

Dakota Electric Association

4300 220<sup>th</sup> Street West

Farmington, MN 55024

**Certificate of Service**

I, Nicole McEathron, 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,G-999/PR-25-2***

Dated this 29th day of September 2025

*/s/ Nicole McEathron*

---

Nicole McEathron

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	PR-25-2
4	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
5	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
6	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
7	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Beverly	Dahlberg	bev Dahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
9	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
10	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
11	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	PR-25-2
12	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
13	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
14	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
15	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
16	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	PR-25-2
17	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
18	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
19	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	PR-25-2
20	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
21	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
22	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
23	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	PR-25-2
24	Jodi	Schinzing	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
25	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
26	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2