

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

LeRoy Koppendrayner
Marshall Johnson
Phyllis A. Reha
Gregory Scott

Chair
Commissioner
Commissioner
Commissioner

In the Matter of a Petition by Peoples Natural Gas Company and Northern Minnesota Utilities, Divisions of UtiliCorp United Inc., for Authority to Increase Natural Gas Rates in Minnesota and to Consolidate the Two Utilities

ISSUE DATE: July 29, 2003

DOCKET NO. G-007, 011/GR-00-951

ORDER ACCEPTING AND ADOPTING SETTLEMENT

PROCEDURAL HISTORY

I. Initial Filings

On May 12, 2000, Peoples Natural Gas Company (Peoples) and Northern Minnesota Utilities (NMU), then both operating divisions of Utilicorp United Inc. and now both operating divisions of Aquila, Inc., filed a combined rate case and a request to consolidate the operations and certain aspects of the rate schedules of the two utilities.¹

On July 18, 2000, the Commission issued its ORDER ACCEPTING RATE CASE FILING AS OF FUTURE COMPLETION DATE² which identified various deficiencies in the Companies' May 12, 2000 filing and allowed the Companies to refile their case whenever the filing could be made substantially complete.

On August 11, 2000, the Companies refiled their general rate case. The Companies requested a rate increase of \$9,846,647 per year or 6.24% over existing rates for the two companies combined. The proposed increase for Peoples was \$8,461,405, or approximately 7.20%. The proposed increase for NMU was \$1,385,242, or approximately 3.45%.

On September 29, 2000, the Commission issued three Orders in the case: an Order accepting the filing as substantially complete and suspending the proposed rates, an Order setting interim rates, and an Order referring the case to the Office of Administrative Hearings for contested case proceedings.

¹ *In the Matter of a Petition By Peoples Natural Gas Company and Northern Minnesota Utilities, Divisions of UtiliCorp United Inc., for Authority to Increase Natural Gas Rates in Minnesota and to Consolidate the Two Utilities*, Docket No. G-007,001/GR-00-517.

² Ibid.

II. The Parties and their Representatives

The Companies were represented by Michael J. Bradley and Richard J. Johnson, Moss and Barnett, 4800 Wells Fargo Center, 90 South Sixth Street, Minneapolis, Minnesota 55402.

The intervenors in the case and their representatives are as follows:

The Minnesota Department of Commerce, represented by Julia E. Anderson and Virginia Zeller, Assistant Attorneys General, 525 Park Street, Suite 200, St. Paul, Minnesota 55103;

The Residential and Small Business Utilities Division of the Office of the Attorney General, represented by Curt Nelson, Financial Analyst, 900 NCL Tower, 445 Minnesota Street, St. Paul, Minnesota 55101-2127;

Eveleth Mines, LLC, Hibbing Taconite Joint Venture, Ispat Inland Mining Company, LTV Steel Mining Company, National Steel Pellet Company, Northshore Mining Company, and the Minntac Mine of USX Corporation, filing jointly as “LPI [Large Power Intervenors] Group,” represented by Robert S. Lee, Mackall, Crouse & Moore, PLC, 1400 AT&T Tower, 901 Marquette Avenue, Minneapolis, Minnesota 55402-2859;

Northern Natural Gas Company, represented by Lon Stanton, Government Affairs Manager, 1650 West 82nd Street, Suite 1250, Minneapolis, Minnesota 55431;

Potlatch Corporation, represented by Laurance R. Waldoch, Lindquist & Vennum P.L.L.P., 4200 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402;

Minnesota Power, represented by Linda Hendrickson, Strategic Regulatory Planner, Minnesota Power, 30 West Superior Street, Duluth, Minnesota 55802.

LSP-Cottage Grove, L.P., represented by Byron E. Starns, Leonard, Street and Deinard, 150 South Fifth Street, Suite 2300, Minneapolis, Minnesota 55402;

Otter Tail Energy Services Company, represented by Edward O’Connell, President, Otter Tail Energy Services Company, 224 East Washington, Fergus Falls, Minnesota 56538.

III. Initial Proceedings and the First Settlement

In December 2000, the Administrative Law Judge held public hearings in the Companies’ assigned service areas to take testimony from members of the public on the proposed rate increases. These hearings were held live in four cities³ and by videoconference in six other cities.⁴ Public comments are summarized in a Commission Order in this docket dated May 11, 2001.

³ Rochester, Cloquet, Eagan, and St. Paul.

⁴ Bemidji, Detroit Lakes, Thief River Falls, Grand Rapids, Worthington, and International Falls.

The Administrative Law Judge also conducted several prehearing conferences and established a schedule for the filing of testimony and for evidentiary hearings. Only three parties filed testimony in the case: the Companies, the Department of Commerce, and the LPI Group. On February 8, 2001, these three parties filed a settlement resolving all issues.

On May 11, 2001, the Commission issued an Order in which it modified the settlement and accepted it as modified. The Commission found that most of the settlement's provisions were supported by substantial evidence and in the public interest. On two issues, however – rate base treatment of gas main and service extensions and rate recovery of manufactured gas plant clean-up costs – the Commission found that the settlement required modification. The Commission also required additional filings on two other issues – vehicle leasing costs and customer billing format and content.

Under the rate case statute, parties have ten days to accept or reject Commission modifications to settlements.⁵ If they reject those modifications, contested case proceedings resume.

On May 18, 2001, the Companies filed notice that they rejected the Commission's modification to the settlement's treatment of gas main and service extensions. In the same filing the Companies accepted the Commission's other modifications, requested a contested case hearing on the gas main/service extension issue, and waived their statutory right to put the proposed rates into effect if the Commission failed to issue a final Order in the case within the statutory time line.⁶ The Companies stated that the gas main and service extension issue was too complex to be tried, briefed, and decided within the remaining statutory time frame.

IV. The Current Settlement

When contested case proceedings resumed, there were again only three parties: the Companies, the Department, and the LPI Group. The parties focused on two main issues: (1) rate base treatment of new gas mains and service extensions, the issue on which the Commission had modified the first settlement; and (2) appropriate rates for the Companies' new aggregation services, an issue the Commission had referred to the rate case for purposes of administrative efficiency in May of 2002.⁷

The Companies and the Department filed testimony and conducted discovery on both issues. In early December the parties notified the Administrative Law Judge that they had significantly narrowed the issues in dispute and wished to use the scheduled evidentiary hearings mainly to provide record support for their settlement and to give the Administrative Law Judge, Commission staff, and other parties an opportunity to explore the settlement on the record. Those hearings took place on December 4 and 5, 2002 and were used as the parties requested.

⁵ Minn. Stat. § 216B.16, subd. 1 (b).

⁶ Minn. Stat. § 216B.16, subd. 2 (e).

⁷ *In the Matter of a Petition by Peoples Natural Gas Company, a Division of UtiliCorp United Inc., to Continue its Aggregation Service, and a Petition by Northern Minnesota Utilities, a Division of UtiliCorp United Inc to Initiate an Aggregation Service*, Docket No. G-007, 011/M-01-1970, ORDER APPROVING AGGREGATION SERVICE OFFERINGS AND REFERRING RATE ISSUE TO RATE CASE (May 7, 2002).

The parties ultimately resolved the few remaining contested issues, and on April 3, 2003, the Administrative Law Judge returned the record to the Commission, reporting that the parties had reached a settlement encompassing all issues.

On June 5, 2003, the settlement came before the Commission. The Companies and the parties appeared and urged the Commission to accept the settlement.

FINDINGS AND CONCLUSIONS

I. Summary of Commission Action

The new settlement includes four sets of terms: (1) terms included in the first settlement and approved by the Commission in its May 11, 2001 Order; (2) terms implementing Commission modifications to the first settlement that were accepted by the parties; (3) terms settling the issue on which the Companies had rejected the Commission's modifications to the first settlement, rate base treatment of new gas mains and new service extensions; and (4) terms settling the issue of appropriate rates for aggregation services, the issue referred to the rate case for purposes of administrative efficiency in May 2002.

Having reviewed the entire record herein and having heard the arguments of the parties, the Commission finds that the settlement is supported by substantial evidence, is in the public interest, and will result in just and reasonable rates. The settlement will be approved.

The Commission continues to approve the settlement terms it originally approved and the modifications to settlement terms it originally required, for the reasons set forth in the May 11, 2001 Order. The Commission also approves the new settlement's terms on the rate base treatment of new gas mains and new service extensions and on rates for aggregation services, for the reasons set forth below.

II. Rate Base Treatment of New Gas Mains and Service Extensions

A. The Original Settlement

When it acted on the first settlement in this rate case, the Commission rejected the provisions on the rate base treatment of new gas mains and new service extensions on grounds that those provisions were not supported by substantial evidence and were not in the public interest. The Commission found that the stipulated additions to rate base were too speculative to support a finding that adding them to rate base would be just and reasonable or a finding that the Companies had proved their accuracy by a preponderance of the evidence.

The Commission found four main barriers to accepting the stipulated adjustments and rejected them for the following reasons:

- (1) The adjustments appeared to accept and incorporate the practice of routinely ignoring the Companies' service extension tariffs.
- (2) The adjustments appeared to be based on the unlikely proposition that every new customer added since the last rate case required the maximum allowable investment.

- (3) The adjustments appeared to be based on the principle that uneconomic investments can be offset by over-performing investments.
- (4) The adjustments were based on a cost justification model that was not Minnesota-specific, had not been examined and approved in any Commission proceeding, and included at least one obvious and significant flaw in the form of inflated sales figures.

All four of these problems stemmed from the Companies' failure to retain in retrievable form the data on which it had based decisions to add new gas mains and make new service extensions. Without this data, the Commission was forced to make its own best judgment on how much of this investment had been economically justified and was therefore recoverable in rates, based on the record and the statutory requirement to resolve doubts in favor of the consumer.⁸

B. The Current Settlement

After the Companies rejected the Commission's modifications to the gas main/service extension component of their settlement, they undertook a lengthy and comprehensive search for documentary evidence on these investments. That search, which took over 1,100 personnel-hours, located original construction drawings, work orders, and feasibility studies for all new main extensions from 1992 through 2000 for Peoples and 1996 through 2000 for NMU. While the search did not locate comparable documentation for new service line extensions, it did yield documentation of how the Companies determined economic feasibility for these extensions and how they calculated customers' contributions in aid of construction.

Based on this information, the Department, the Companies, and the LPI Group agreed that it was just and reasonable to reduce Peoples' proposed rate base addition for new gas mains and service extensions by \$2,622,783 and to reduce NMU's proposed rate base addition by \$1,837,262.

The documentary evidence that the Companies have recently located provides a credible factual basis for the numbers to which they have stipulated. It effectively addresses the concerns that led the Commission to reject as speculative the gas main/service extension provisions of the first settlement. The Commission concurs with the parties that these adjustments are supported by substantial evidence, are in the public interest, and will result in just and reasonable rates.

III. Rates for Aggregation Services

On May 7, 2002 the Commission issued an Order approving the Companies' proposal to offer aggregation services as a permanent service offering, finding that these services can be an important tool for businesses seeking to control their energy costs. The Commission also referred the issue of appropriate rates for the service to the rate case instead of opening a new and potentially duplicative rate-setting proceeding.⁹

⁸ Minn. Stat. § 216B.03.

⁹ *In the Matter of a Petition by Peoples Natural Gas Company, a Division of UtiliCorp United Inc., to Continue its Aggregation Service, and a Petition by Northern Minnesota Utilities, a Division of UtiliCorp United Inc to Initiate an Aggregation Service*, Docket No. G-007, 011/M-01-1970, ORDER APPROVING AGGREGATION SERVICE OFFERINGS AND REFERRING RATE ISSUE TO RATE CASE (May 7, 2002).

In their settlement, the parties agreed that the appropriate rate for aggregation services was \$0.0425 per Mcf, that the new rate should take effect at the same time as the other rates set in this case, and that the Companies should recognize the revenue from the new rate by applying this revenue prospectively as a “surcredit” to reduce the residually-set general service rates, instead of adjusting the overall revenue requirement.

The Commission concurs with the parties that their resolution of this issue is supported by substantial evidence, is in the public interest, and will result in just and reasonable rates. The cost basis of the new rate is amply documented in the record. The Department’s adjustment to the Companies’ original overhead allocation formula appropriately resolves allocation ambiguities in favor of the consumer.

In short, the parties’ agreement on aggregation services falls within the boundaries of regulatory reasonableness and will be approved. This decision of course does not represent a policy change on how new rates are implemented, on how interim rate refunds are handled, or on any other issue. Rather, it represents the Commission’s considered judgment that in this unique factual context, both the settlement as a whole and this particular component are supported by substantial evidence, are in the public interest, and will result in just and reasonable rates.

IV. Financial Schedules

Overall Financial Summaries

Peoples Natural Gas

Rate Base Summary

Based on the foregoing findings, the Commission concludes that the appropriate rate base for the test year for Peoples Natural Gas is \$83,051,031 as shown below:

UTILITY PLANT IN SERVICE	
Intangible	\$ 1,372,703
Manufactured Gas Production	2,707,044
Transmission	3,067,176
Distribution	126,922,996
General	<u>23,465,383</u>
Total Plant in Service	<u>\$157,535,302</u>
 RESERVE FOR DEPRECIATION	
Intangible	\$ 854,136
Manufactured Gas Production	1,965,854
Transmission	702,473
Distribution	53,767,722
General	<u>6,159,386</u>
Total Reserve for Depreciation	<u>\$ 63,449,571</u>
 NET PLANT IN SERVICE	 \$ 94,085,731

OTHER RATE BASE ITEMS	
Construction Work in Progress	1,302,847
Accumulated Deferred Income Tax	(16,712,740)
Customer Advances	(67,884)
Cash Working Capital	(2,214,201)
Average Materials and Supplies	949,409
Gas Storage Inventory	2,453,812
Deferred Environmental Costs	3,230,942
Prepayments	<u>23,115</u>
TOTAL AVERAGE RATE BASE	<u>\$ 83,051,031</u>

Operating Income Summary

Based on the foregoing findings regarding the Stipulation, the Commission concludes that the appropriate Minnesota jurisdictional operating income for the test year under present rates for Peoples Natural Gas is \$5,292,232 as shown below:

UTILITY OPERATING REVENUES	
Retail Gas Sales	\$120,006,184
Other Operating Revenues	715,000
AFUDC	<u>92,939</u>
Total Operating Revenues	<u>\$120,814,123</u>
UTILITY OPERATING EXPENSES	
Purchased Cost of Gas	\$ 80,132,984
Manufactured Gas Production	1,317,387
Transmission	1,019
Distribution	6,766,198
Customer Accounts	4,266,002
Customer Service & Information	1,299,788
Sales	91,995
Administrative & General	9,257,629
Depreciation & Amortization	6,463,852
Taxes Other than Income	<u>4,581,729</u>
Total Operating Expenses	<u>\$114,178,583</u>
Net Operating Income Before Taxes	<u>\$ 6,635,540</u>
Income Taxes	
Federal	\$ 1,025,096
State	<u>318,212</u>
Total Income Taxes	<u>\$ 1,343,308</u>
NET OPERATING INCOME	<u>\$ 5,292,232</u>

Gross Revenue Deficiency

The above Commission findings and conclusions result in Minnesota jurisdictional gross revenue deficiency for the test year for Peoples Natural Gas of \$5,045,293 as shown below:

Average Rate Base	\$ 83,051,031
Rate of Return	<u>9.934%</u>
Required Operating Income	\$ 8,250,289
Test Year Operating Income	<u>\$ 5,292,232</u>
Income Deficiency	\$ 2,958,057
Gross Revenue Conversion Factor	<u>1.70561</u>
Gross Revenue Deficiency	<u>\$ 5,045,293</u>

Northern Minnesota Utilities

Rate Base Summary

Based on the foregoing findings, the Commission concludes that the appropriate rate base for the test year for Northern Minnesota Utilities is \$32,546,634 as shown below:

UTILITY PLANT IN SERVICE	
Intangible	\$ 526,698
Transmission	2,563,332
Distribution	42,962,811
General	<u>11,899,385</u>
Total Plant in Service	<u>\$ 57,952,226</u>
RESERVE FOR DEPRECIATION	
Intangible	\$ 418,659
Transmission	519,412
Distribution	15,538,593
General	<u>3,210,556</u>
Total Reserve for Depreciation	<u>\$ 19,687,220</u>
NET PLANT IN SERVICE	\$ 38,265,006
OTHER RATE BASE ITEMS	
Construction Work in Progress	1,523,679
Accumulated Deferred Income Tax	(6,302,655)
Customer Advances	(176,650)
Cash Working Capital	(1,352,158)
Average Materials and Supplies	27,546
Gas Storage Inventory	556,900
Prepayments	<u>4,966</u>
TOTAL AVERAGE RATE BASE	<u>\$ 32,546,634</u>

Operating Income Summary

Based on the foregoing findings regarding the Stipulation, the Commission concludes that the appropriate Minnesota jurisdictional operating income for the test year under present rates for Northern Minnesota Utilities is \$2,824,566 as shown below:

UTILITY OPERATING REVENUES	
Retail Gas Sales	\$ 39,250,857
Other Operating Revenues	300,000
AFUDC	<u>97,636</u>
Total Operating Revenues	<u>\$ 39,648,493</u>
UTILITY OPERATING EXPENSES	
Purchased Cost of Gas	\$ 23,856,516
Manufactured Gas Production	8,417
Distribution	2,198,602
Customer Accounts	1,510,307
Customer Service & Information	370,396
Sales	18,152
Administrative & General	3,089,397
Depreciation & Amortization	2,376,766
Taxes Other than Income	<u>2,339,312</u>
Total Operating Expenses	<u>\$ 35,767,865</u>
Net Operating Income Before Taxes	<u>\$ 3,880,628</u>
Income Taxes	
Federal	\$ 805,895
State	<u>250,167</u>
Total Income Taxes	<u>\$ 1,056,062</u>
NET OPERATING INCOME	<u><u>\$ 2,824,566</u></u>

Gross Revenue Deficiency

The above Commission findings and conclusions result in Minnesota jurisdictional gross revenue deficiency for the test year for Northern Minnesota Utilities of \$696,942 as shown below:

Average Rate Base	\$ 32,546,634
Rate of Return	<u>9.934%</u>
Required Operating Income	\$ 3,233,183
Test Year Operating Income	<u>\$ 2,824,566</u>
Income Deficiency	\$ 408,617
Gross Revenue Conversion Factor	<u>1.70561</u>
Gross Revenue Deficiency	<u><u>\$ 696,942</u></u>

V. Compliance Filing and Related Issues

A. Amendment to Settlement

At hearing the parties agreed to a housekeeping amendment to their settlement to conform it with compliance filing requirements recommended by Commission staff. They agreed to amend one sentence of subsection c, captioned “Regulatory Streamlining,” as follows:

Aquila Networks will operate for regulatory purposes under the name Aquila Networks – PNG and Aquila Networks – NMU. Its tariffs, ~~bills and customer information~~ and regulatory filings will reflect these designations, retaining the current operating division in the areas currently served by Peoples and NMU.

This is a helpful and clarifying amendment, and it will be approved.

B. Customer Bills

The Companies and the Department have been working together both to simplify customer bills and to increase the amount of useable information they contain. This is a challenging and increasingly important project. The May 11, 2001 Order modifying the first settlement directed the Companies to continue working with the Department to produce the most informative customer bills possible. The Commission will require the Companies to include in their compliance filing the revised billing format resulting from these working sessions.

C. Compliance Filing

The Commission will reinstate the compliance filing requirements of the May 11, 2001 Order, revised as necessary to reflect changes in the underlying decisions. Compliance filings are indispensable to preventing miscues and unintended consequences in implementing rate case Orders.

D. Filing Requirements for Next Rate Case

The Commission will reiterate existing company-specific filing requirements for the Companies’ next rate case, in addition to adding the cost-allocation filing requirements adopted in the parties’ settlement.

ORDER

1. The Commission accepts and adopts the settlement submitted by the parties.
2. Within 30 days of the date of this Order the Companies shall file revised schedules of rates and charges reflecting the revenue requirement and the rate design decisions herein, along with the proposed effective date, and including the following information:
 - a. A breakdown of Total Operating Revenues by type;

- b. Schedules showing all billing determinants for the retail sales (and sale for resale) of gas. These schedules shall include but not be limited to:
 - i. Total revenue by customer class;
 - ii. Total number of customers, the customer charge and total customer charge revenue by customer class; and
 - iii. For each customer class, the total number of commodity and demand related billing units, the per unit commodity and demand cost of gas, the non-gas unit margin, and the total commodity and demand related sales revenues.
 - c. Revised tariff sheets incorporating authorized rate design decisions;
 - d. Proposed customer notices explaining the final rates and a full explanation of the monthly customer charge.
3. Within 30 days of the date of this Order the Companies shall file a revised base cost of gas and supporting schedules incorporating any changes made as a result of this rate case, and automatic adjustments establishing the proper adjustments to be in effect at the time final rates become effective.
 4. Within 30 days of the date of this Order the Companies shall file a calculation of the CIP CCRCs based on the decisions made herein and schedules detailing the CIP tracker balance at the beginning of interim rates, the revenues (CCRC and CIP Adjustment Factor) and costs recorded during the period of interim rates, and the CIP tracker balance at the time final rates become effective.
 5. Within 30 days of the date of this Order the Companies shall file copies (revised as necessary) of all standard customer service agreements and contracts for inclusion in their tariff book.
 6. Within 30 days of the date of this Order the Companies shall file a proposal to make refunds of interim rates, including interest calculated at the average prime rate, to affected customers. The Companies shall clearly detail adjustments to the refund for the CIP tracker balance. The Companies shall include calculations supporting the CIP tracker balance as of the date final rates are effective.
 7. Within 30 days of the date of this Order the Companies shall file the revised customer bill format developed in conjunction with the Department; the Companies shall implement the new format at the same time as the final rates approved herein.
 8. Within 30 days of the date of this Order the Companies shall make a filing showing the rates that would have resulted had there been no manufactured gas plant clean-up costs added to rate base and included in test year costs in this case.
 9. Comments on all filings required above shall be filed within 15 days of the date of the filing.

10. The Commission approves and adopts the parties' amendment to their stipulation and agreement, subsection c, captioned "Regulatory Streamlining," as set forth below:

Aquila Networks will operate for regulatory purposes under the name Aquila Networks – PNG and Aquila Networks – NMU. Its tariffs, ~~bills and customer information~~ and regulatory filings will reflect these designations, retaining the current operating division in the areas currently served by Peoples and NMU.
11. The Companies shall reconcile their billing and communications practices with the March 31, 2003 Stipulation and Agreement, as amended above, and with state law regarding the use of trade names.
12. The Companies shall work with the staff of the Commission and the Department of Commerce to develop an appropriate exhibit in their tariff that will enable the main and service extension feasibility model to be replicated using the then-current inputs.
13. In its next rate case filing, the Companies shall include a schedule for all finalized leases for vehicles used in Minnesota, showing the forecasted residual value, the actual residual value, and the additional amount due or refund received at the end of each lease.
14. Unless the Companies make a cost allocation filing before their next rate case filing, they shall include in their next rate case filing the following information:
 - (a) the methods by which it identifies and assigns direct costs;
 - (b) the methods by which it identifies and allocates indirect costs;
 - (c) whether its general allocation method provides results consistent with the requirements and principles developed in the Commission's industry-wide cost allocation docket, *In the Matter of an Investigation into the Competitive Impact of Appliance Sales and Service Practices of Minnesota Gas and Electric Utilities*, Docket No. G,E-999/CI-90-1008, ORDER SETTING FILING REQUIREMENTS (September 28, 1994); and
 - (d) whether and how its allocation structure assures that shared costs are allocated to all applicable regulated and non-regulated activities.
15. In their next rate case filing, the Companies shall include the information set forth below, required in the Commission's February 14, 2003 Order Approving Joint Recommendation, *In the Matter of an Inquiry Into Possible Effects of the Financial Difficulties at Aquila, Inc. on Peoples Natural Gas Company and Northern Minnesota Utilities Company*, Docket No. G-007,011/CI-02-1369:
 - (a) identify all issuances of debt and associated costs from January 1, 2002, until the next rate case in a manner that will facilitate a potential adjustment to mitigate the impact of adverse market factors caused by Aquila's financial problems. Specifically, Aquila shall provide information sufficient to allow the Commission to evaluate what the debt and equity costs for Peoples and NMU would have been but for the effects of Aquila's other operations; and
 - (b) provide a discussion and analysis of the effects of Aquila's financial situation on Peoples' and NMU's cost of common equity.

16. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar
Executive Secretary

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