

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair
Commissioner
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In the Matter of the Complaint of Energy
CENTS Coalition Against Beltrami Electric
Cooperative

ISSUE DATE: March 4, 2004

DOCKET NO. E-103/M-02-105

ORDER REQUIRING COMPLIANCE
FILING

PROCEDURAL HISTORY

On January 23, 2002, the EnergyCENTS Coalition (EnergyCENTS or the Coalition) filed a complaint under Minn. Stat. § 216B.17, subd. 6a against Beltrami Electric Cooperative, Inc. (Beltrami or the Cooperative) on behalf of Coalition member Red Lake Community Action Program. Later, approximately 83 individual members of the Cooperative signed on to the Complaint.

The Complaint claimed that, at least as to residents of the Red Lake Reservation, Beltrami's customer service practices violated Minnesota law, citing the following practices as examples:

- charging excessive reconnection fees following disconnection of service;
- conditioning service to new customers upon their payment of reconnection fees for which they were not liable;
- charging additional fees for routine meter reading;
- charging excessive deposit requirements;
- failing to offer payment plans for undercharges resulting from faulty metering or estimated bills;
- delaying service deposit refunds and paying inadequate interest on service deposits;
- assessing past-due charges of former tenants to new tenants seeking service at the same location;
- failing to provide clear and accurate notice of intent to disconnect under the Cold Weather Rule;
- failing to comply with the notice periods of the Cold Weather Rule;
- failing to comply with Cold Weather Rule restrictions on deposit requirements and delinquency charges;

- violating customers' reasonable expectations of privacy;
- failing to comply with consumer protection statutes requiring utilities to offer payment plans to customers facing arrearages.

On April 25, 2002, the Commission issued an Order asserting jurisdiction over the complaint and asking the Department of Commerce (the Department) to conduct an investigation of its allegations.

On August 19, 2003, the Department filed its Investigation Report (the Report), recommending that the Commission require Beltrami to take specific steps to comply with regulatory requirements, to improve customer service, and to improve communications with members on the Red Lake Reservation.

EnergyCENTS, Beltrami, the Residential and Small Business Utilities Division of the Office of the Attorney General (RUD-OAG), and Otter Tail Power Company (Otter Tail) filed comments on the Report.

The RUD-OAG supported the Report's recommendations. Beltrami agreed to implement some of the Report's recommendations but opposed others. EnergyCENTS argued that the relief recommended in the Report was inadequate and urged further investigation. Otter Tail, which had come into the discussions at the request of the Department, indicated its willingness to continue discussions with the parties.

On February 12, 2004, the Report came before the Commission.

FINDINGS AND CONCLUSIONS

I. The Department's Report

The Department's Report contained three main findings: (1) Several of Beltrami's customer service practices violate the letter of the law, and others must be modified to meet its intent. (2) Communication between Beltrami and its Red Lake members is severely strained and marked by mutual distrust and animosity. (3) The evidence gathered during the investigation does not demonstrate that Beltrami treats its Red Lake members differently from its non-Red Lake members.

The Report also stated that the investigatory process had been extremely difficult due to Beltrami's failure/inability to provide relevant information and due to hostility between Complainants and the Cooperative.

The Department's findings are summarized below.

A. Customer Service Issues

The Department reported that Beltrami was violating the Public Utilities Act, Commission rules, and Minnesota's consumer protection statutes in the following ways:

- (1) Conditioning the provision of service on the payment of outstanding arrearages of landlords or previous tenants, violating Minn. Stat. § 325E.025.
- (2) Failing to offer payment plans to customers in arrears, violating Minn. Stat. § 216B.098, subd. 3 and Minn. Stat. § 216B.097, subd. 2 (5).
- (3) Failing to waive late fees and interest and failing to offer payment plans of appropriate length when billing customers for undercharges, violating Minn. Stat. § 216B.098, subd. 4.
- (4) Failing to provide 20 days' written notice or 15 days' hand-delivered notice before disconnecting service during the Cold Weather months, violating Minn. Stat. § 216B.097, subd. 3.
- (5) Assessing delinquency charges against persons eligible for Cold Weather Rule protection, violating Minn. Rules 7820.1750.

The Department also recommended that the Commission require Beltrami to make the following specific improvements to its customer service practices:

- (1) Develop a policy on the use of service limiters without discrimination; involve low-income members in developing the policy; communicate the policy clearly to all members; and strictly adhere to the policy.
- (2) Inform members of the new state law classifying the use of service limiters as a disconnection and of Beltrami's new service limiter policy, both through a special mailing and through publication in the same issue of the Cooperative's newsletter that contains the annual explanation of the Cold Weather Rule.
- (3) Develop a procedure to regularly remind and inform members of the Cooperative's membership fee refund policy.
- (4) Develop a procedure for informing customers of the importance of notifying the utility of changes in address.
- (5) Revise Cooperative Policy #206 to accurately reflect actual practice in regard to service deposits.

- (6) Improve notice of deposit refunds by highlighting the refund line item on the customer's bill or enclosing a bill stuffer explaining the refund.
- (7) Re-examine the practice of issuing disconnection notices when there is no real intent to follow through with disconnection.
- (8) Continue providing information on Past Due and Late Notices explicitly explaining the consequences of non-payment, including the collection, disconnection, and reconnection fees charged if a disconnection trip is made.
- (9) Revise membership agreement to permit members to authorize Beltrami to release account information to Energy Assistance Program agencies when members incur arrearages of 60 days or more.

B. Customer Relations Issues

The Department reported that many of the prerequisites for effective problem-solving appeared to be missing in this case. There appeared to be poor communication between the parties, little confidence in the goodwill of the other party, and a history of strained relations based on real or perceived grievances.

The Department stated that one way to resolve these problems would be to reassign the right and duty to serve the Red Lake Reservation to another utility. To explore this possibility, the Department initiated discussions with a neighboring utility, Otter Tail Power Company. Otter Tail has indicated its willingness to continue in dialogue with the parties on the potential for and the implications of such a transfer.

C. Disparate Treatment Issues

One of the issues the Department was asked to investigate was whether Beltrami treated its Red Lake members differently than it treated other members. The Department stated that the evidence gathered during the investigation did not demonstrate disparate treatment. The agency attributed perceived disparities to the higher incidence of poverty on the Red Lake Reservation, with correspondingly higher rates of overdue bills and collection actions.

II. Positions of the Parties

A. Beltrami

Beltrami acquiesced in many Department recommendations, stating that adopting them would just refine or institutionalize current practice. The Cooperative did, however, oppose the recommendation that it stop charging new tenants for the past-due bills of landlords who were

former occupants at the tenant's address, stating that it was inequitable for landlords to receive full rent when they had outstanding past-due utility bills. The Cooperative also opposed changing its disconnection notice procedures to limit those notices to cases in which disconnection is truly contemplated.

The Cooperative also challenged the Department's claim that the Cold Weather Rule prohibited the Cooperative from imposing deposit requirements and late fees on customers who qualified for Cold Weather Rule protection, stating that the Rule did not apply to cooperatives.

Finally, Beltrami suggested that many Department recommendations intended to improve communications were needlessly burdensome.

B. EnergyCENTS

Complainants argued that the investigation was incomplete. They pointed out that the Department had emphasized how difficult it had been to secure information from Beltrami and argued that such difficulties had compromised the thoroughness of the investigation.

They stated that Beltrami had failed to respond to 22 of their 136 Information Requests and argued that the Department should have compelled Beltrami's compliance, using Commission processes if necessary. They stated that a complete and thorough investigation would yield evidence demonstrating disparate treatment of Red Lake Reservation members.

At hearing they introduced two witnesses from the Red Lake community, who claimed first-hand knowledge of cases in which Red Lake members had been required to pay for service previously rendered to persons not living with them as condition of receiving service from Beltrami.

Complainants concurred in all the Department's recommendations but sought additional relief, including refunds for Red Lake members who had had to pay other members' bills.

C. RUD-OAG

The Residential and Small Business Utilities Division of the Office of the Attorney General concurred in the Department's recommendations.

III. Summary of Commission Action

The Commission is not convinced at this point that requiring Beltrami to take the steps recommended by the Department will satisfactorily resolve all the issues raised in this Complaint. Those steps are necessary and will be required, but it is not clear that those steps alone will ensure that Red Lake members receive the full measure of consumer protection to which they are entitled.

The Commission will therefore require the Cooperative to take the actions the Department recommends, to take additional actions the Commission finds necessary, and to answer questions from any party designed to permit direct comparisons between Red Lake customers and other Cooperative customers or between the Cooperative's treatment of Red Lake customers and its treatment of other customers.

The Commission will require the Cooperative to make a compliance filing in 60 days detailing its compliance with the requirements of this Order.

These actions are explained more fully below.

IV. Bringing Customer Service Practices into Compliance with the Law

The Commission will require Beltrami to cease or revise the customer service practices discussed below to comply with Minnesota statutes or rules.

A. Conditioning the Provision of Service on the Payment of Other Customers' Arrearages.

Complainants claimed that it is common practice for Beltrami to require Red Lake customers to pay the past-due bills of persons with whom they did not reside when the bills were incurred – typically landlords, relatives, or previous tenants. Beltrami denied that this was true across the board, but conceded billing customers for the arrearages of their landlords, explaining that the Cooperative believed that the most equitable approach to a landlord's arrearage was for the tenant to pay it and deduct it from the rent.

The Commission concurs with the Department that Minnesota's consumer protection statutes do not give the Cooperative this option. Minn. Stat. § 325E.025, subd. 2 states that

A utility shall not . . . condition service on payment of an outstanding bill or other charge for utility service due upon the outstanding account of a previous customer or customers when all of the previous customers have vacated the property . . .

This statute clearly prohibits withholding utility service for the purpose of forcing payment of an arrearage incurred by any previous "customer," a broad term that clearly includes a landlord. Further, the Cooperative's argument that a landlord, by virtue of his or her continuing property interest, cannot vacate a premises, is unpersuasive. Not only does it fly in the face of the common meaning of "vacate," but it is unsupported by the specific legal meaning of the term – "To move out; to make vacant or empty; to leave; especially, to surrender possession by removal; to cease from occupancy." BLACK'S LAW DICTIONARY 1548 (6th ed. 1990).

Finally, the Commission remains concerned about Complainants' claim that Beltrami frequently pressures Red Lake members into paying the past-due bills of relatives and previous tenants. At hearing two Red Lake members gave statements claiming first-hand knowledge of that practice. These statements – while not sworn, cross-examined, or dispositive – are credible threshold evidence and are deeply concerning.

The Commission will therefore require the utility to search its records and identify all cases in which a Red Lake customer, at the request or insistence of Cooperative personnel or as a condition of receiving service, has paid the past due bill of a landlord, a relative, or any other person with whom the customer did not reside at the time that the bill was incurred.

B. Failing to Affirmatively Offer Payment Plans to Customers in Arrears.

Minnesota law requires cooperatives to provide members at risk of disconnection with “a statement explaining available time payment plans and other opportunities to secure continued utility service.”¹ It also requires cooperatives to “offer a payment agreement for the payment of arrears,”² whether or not disconnection is at issue.

Beltrami stated that it complied with these statutes by accepting some customer-initiated payment plans and by including language on its disconnection notice stating that disconnection would result “if arrangements are not made on your electrical account.” Nevertheless, the Cooperative indicated a willingness to begin to affirmatively offer payment plans and to train their personnel in their use.

The Commission is gratified by this agreement and will require a compliance filing by Order, since the Commission interprets these statutes to require active offering of payment plans, not just their passive acceptance. The Commission will require a compliance filing demonstrating that new procedures are in place whereby members in arrears are offered payment plans and are informed that partial payments can prevent disconnection.

C. Failure to Affirmatively Offer Payment Plans of Appropriate Length to Undercharged Customers, Waiving Interest and Late Fees.

Minn. Stat. § 216B.098, subd. 4 requires utilities seeking to collect undercharges from customers to waive interest and late fees and offer installment payment plans of at least the same length as the time over which the undercharge was incurred. The Department states that Beltrami does not meet these requirements.

Beltrami states that it meets these requirements by “allowing the member to repay the undercharge over an equal number of months that the undercharge occurred.” The Cooperative does not state

¹ Minn. Stat. § 216B.097, subd. 2 (5).

² Minn. Stat. § 216B.098, subd. 3.

that it affirmatively offers payment plans or that it waives interest and late fees. It does, however, state a willingness to review and revise its policies and payment plans and train personnel in their use.

The Commission is gratified by this agreement and will require a compliance filing by Order, since the Commission interprets the statute to require active offering of payment plans, not just their passive acceptance, as well as the active waiver of late fees and interest.

D. Failure to Provide 20 Days' Written Notice or 15 Days' Hand-Delivered Notice Before Disconnecting Service.

Minn. Stat. § 216B.097, subd. 3 (a) requires cooperatives to give members 20 days' written notice or 15 days' hand-delivered notice before disconnecting service during the Cold Weather months. The Department reported that Beltrami has not consistently complied with this requirement. Beltrami conceded that it has been technically out of compliance on occasion and stated that it has revised its policies to ensure full compliance in the future.

The Commission is gratified by this agreement and will require a compliance filing by Order to ensure compliance with this fundamental requirement.

E. Failure to Waive Delinquency Charges for Customers Eligible for Cold Weather Rule Protection.

Minn. Rules 7820.1750 prohibits utilities from assessing delinquency charges against customers who are eligible for Cold Weather Rule protection. The Department urges the Commission to require the Cooperative to comply.

The Cooperative claims that the Commission cannot require it to comply because, as a non-rate-regulated utility, Beltrami is exempt from the requirements of the Cold Weather Rules. The Commission disagrees and will require compliance.

Under Minn. Stat. § 216B.17, subd. 6a, the Commission has complaint and "own motion" jurisdiction over the service standards and practices of cooperatives. Under Minn. Rules 7820.1600, subp. 6a, the Commission applies and enforces the provisions of the Cold Weather Rules when complaints on Cold Weather issues are filed under Minn. Stat. § 216B.17, subd. 6a. That is precisely the situation here, and the Commission will require compliance.

The Commission has long held that the Cold Weather Rules apply to cooperatives when members or other complainants file complaints under Minn. Stat. § 216B.17, subd. 6a. In its 1989 Statement of Need and Reasonableness on proposed Cold Weather Rule amendments, the Commission explained

Cooperative electric associations may also be treated as a public utility when a complaint is filed under Minn. Stat. § 216B.17, subd. 6a (1988). See Exhibit 6. The complaint statute is limited to service standards and practices. The cold weather rule is clearly a service standard and practice, rather than a rate rule. Therefore, the proposed definition includes the complaint statute for cooperative electric associations.

In the Matter of the Proposed Rule Amendments Governing Disconnection During Cold Weather, Minn. Rules, parts 7820.1500 to 7820.2300, Docket No. G,E-999/R-86-322, Statement of Need and Reasonableness at 9 (November 7, 1989).

The proposed rule defining cooperatives as public utilities, subject to the provisions of the Cold Weather Rules, in complaint situations passed muster under the rulemaking provisions of the Administrative Procedure Act and is now a duly promulgated and legally binding rule.

Similarly, in another case in which a cooperative challenged the Commission's authority to apply the Cold Weather Rules in complaint situations, the Commission explained

No one disputes that a complaint has been filed under § 216B.17 challenging the co-op's initial refusal to reinstate service to Mr. and Mrs. Michels. This complaint triggers Commission jurisdiction over the co-op's cold weather disconnection and reinstatement standards and practices, which in turn triggers the application of the Cold Weather Rules. The Commission rejects the contention that § 216B.097's failure to reference Commission authority overrides § 216B.17's clear grant of authority.

In the Matter of the Petition of Frost Benco Wells Electric Cooperative, Inc. Regarding the Application of the Cold Weather Rule, Docket No. E-104/CI-98-73, Order Finding Jurisdiction, Affirming Eligibility Determination, and Denying Petition (April 24, 1998).

The Commission continues to believe that applying the Cold Weather Rules to cooperatives in complaint situations is authorized by statute, required by rule, and vital to the public interest.

V. Other Customer Service Practices Requiring Remedial Action

The Commission will also require Beltrami to take the remedial measures set forth below to eliminate confusion and promote more effective communication with Red Lake members.

- A. Develop a policy on the use of service limiters without discrimination; involve low-income members in developing the policy; communicate the policy clearly to all members; and strictly adhere to the policy.**

Beltrami's use of service limiters appears to have been one of the central reasons for this Complaint, in large part because Complainants believe that these devices have at times been used in an arbitrary or discriminatory manner. Last session the Legislature directed its attention to the practice and enacted legislation requiring that the use of service limiters be treated as a disconnection for Cold Weather Rule purposes.³

The Commission concurs with the Department that service limiter policies should be carefully developed in an unbiased environment with input from low-income members, and then clearly communicated to all members and strictly followed. No procedure less exacting than this can allay suspicions of discriminatory treatment.

- B. Inform members of the new state law classifying the use of service limiters as a disconnection and of Beltrami's new service limiter policy, both through a special mailing and through publication in the same issue of the Cooperative's newsletter that contains the annual explanation of the Cold Weather Rule.**

The Commission concurs with the Department that these are reasonable measures to end confusion and ambiguity – and, it is hoped, suspicion – on this extremely important and sensitive issue.

- C. Develop a procedure to regularly remind and inform members of the Cooperative's membership fee refund policy.**

The Department reported significant confusion among members on the issue of membership fees and their refund. The Commission concurs with the Department that the Cooperative should develop a procedure for periodically informing members of its policies and practices regarding these fees.

- D. Develop a procedure for informing customers of the importance of notifying the utility of changes in address.**

One of the Department's central conclusions in this investigation was that inadequate communication was damaging Beltrami's relationship with its members. The recommendation on address changes grew out of findings that some members were insufficiently aware of why it was important to inform Beltrami of address changes and how and when to do so.

The Commission concurs with the Department that accurate information and effective communication are critical to good customer service, and the Commission will require Beltrami to

³ Minn. Stat. §§ 216B.095 (b); 216B.097, subd. 4.

develop the procedure the Department recommends. The Commission also notes that, to the extent that Red Lake members may have been under the impression that they were responsible for the bills of landlords, relatives, or former tenants, they would not have appreciated the importance of notifying Beltrami of address changes.

E. Revise Cooperative Policy #206 to accurately reflect actual practice in regard to service deposits.

The Department recommended that Beltrami revise its Policy 206, on service deposits, to accurately reflect actual practice. To avoid discriminatory or arbitrary behavior – and the appearance of discriminatory or arbitrary behavior – it is important that written policies and actual practice coincide. The Commission will require this revision.

F. Improve notice of deposit refunds by highlighting the refund line item on the customer's bill or enclosing a bill stuffer explaining the refund.

The Department reported finding significant confusion on deposit refund issues, including failure to recognize when a bill included a credit for refund of a deposit. The Commission concurs with the Department that the Cooperative should take steps to ensure that members know when their deposits are refunded by bill credit.

G. Re-examine the practice of issuing disconnection notices when there is no real intent to follow through with disconnection.

The Department reported that Beltrami issues disconnection notices as part of its collection process, far in advance of the point at which it would actually disconnect service, without disclosing that disconnection is not imminent. This practice has caused unnecessary worry for some members and potentially dangerous complacency for others.

The Commission concurs with the Department that Beltrami should reexamine its practice in this area. Disconnection notices are not a collection tool. They should not be sent so routinely that reasonable members with arrearage experience will disregard them. Neither should they be sent so early that reasonable members without arrearage experience will suffer unnecessary anxiety. Disconnection notices are meant to perform the important function of apprising the customer that disconnection is a realistic, near-term possibility that must be dealt with.

The Commission will require Beltrami to reexamine its policies on issuing disconnection notices and to report on its findings by compliance filing.

H. Continue providing information on Past Due and Late Notices explicitly explaining the consequences of non-payment, including the collection, disconnection, and reconnection fees charged if a disconnection trip is made.

The Department emphasized that, while sending premature disconnection notices caused confusion, providing succinct and accurate information on the consequences of non-payment was often helpful. The Department therefore recommended requiring Beltrami to continue providing this information on past due and late notices.

The Commission concurs with the Department that complete and accurate information benefits consumers and will require the Cooperative to report by compliance filing on its efforts to provide complete information.

I. Revise membership agreement to permit members to authorize Beltrami to release account information to Energy Assistance Program agencies when members incur arrearages of 60 days or more.

The Department recommended requiring Beltrami to revise its membership agreement to give members the option of pre-authorizing the release of account information to Energy Assistance agencies, should their accounts become 60 days or more past due. The Commission concurs that members should have this option and will so order.

VI. Further Fact-Finding

Finally, despite the commendable and exhaustive efforts of the Department, this case requires further fact-finding. Complainants have not received answers to all their discovery requests, especially requests for information that would permit them to compare the Cooperative's treatment of Red Lake customers with its treatment of other customers. The Department, too, has reported difficulties in getting information from Beltrami.

Further, Complainants have introduced documents suggesting that Beltrami has at times required security deposits in excess of the amount authorized in its written policies, which is \$100 or the amount of two months' average bills. It appears that Beltrami has at times required a second deposit after disconnection, without applying the first deposit to the arrearage.

More serious still, two members of the Red Lake community have stated at hearing that they have personal knowledge of cases in which Red Lake members were required to pay past-due bills of relatives or previous tenants as a condition of receiving service. This, too, bears further examination.

The Commission will therefore require Beltrami to respond to further discovery and to make a compliance filing detailing the actions it has taken and intends to take to comply with the requirements established in this Order. After that filing has been received and analyzed, the Commission will take up this matter again.

The Commission will so order.

ORDER

1. Beltrami Electric Cooperative shall develop a policy on the non-discriminatory use of service limiters, shall involve low-income members in developing the policy, shall communicate the policy clearly to all members, and shall strictly adhere to the policy once it has been developed.
2. Beltrami Electric Cooperative shall inform members of the new state law classifying the use of service limiters as a disconnection and of Beltrami's new service limiter policy, both through a special mailing and through publication in the same issue of the Cooperative's newsletter that contains the annual explanation of the Cold Weather Rule.
3. Beltrami Electric Cooperative shall develop a procedure to regularly remind and inform members of the Cooperative's membership fee refund policy.
4. Beltrami Electric Cooperative shall search its records and identify all cases in which a Red Lake customer, at the request or insistence of Cooperative personnel or as a condition of receiving service, paid the past due bill of a landlord, a relative, or any other person with whom the customer did not reside at the time that the bill was incurred.
5. Beltrami Electric Cooperative shall develop a procedure for informing customers of the importance of notifying the utility of changes in address.
6. Beltrami Electric Cooperative shall revise Policy #206 to accurately reflect actual practice in regard to service deposits.
7. Beltrami Electric Cooperative shall improve notice of deposit refunds by highlighting the refund line item on the customer's bill or enclosing a bill stuffer explaining the refund.
8. Beltrami Electric Cooperative shall revise its written and unwritten policies regarding payment plans to ensure compliance with Minn. Stat. §§ 216B.097 and 216B.098, to ensure that payment plans are affirmatively offered to customers in arrears, and to ensure that customers are informed that entering into a payment plan can prevent disconnection. The Company shall provide staff with effective training and instruction to implement the new policies.
9. Beltrami Electric Cooperative shall revise its collection procedures to ensure that customers receive 20 days' written notice or 15 days' hand-delivered notice before disconnection during the Cold Weather months.
10. Beltrami Electric Cooperative shall reexamine and revise its policy or practice of issuing disconnection notices when there is no intention of following through with the disconnection.

11. Beltrami Electric Cooperative shall continue providing information on Past Due and Late Notices explicitly explaining the consequences of non-payment, including the collection, disconnection, and reconnection fees charged if a disconnection trip is made.
12. Beltrami Electric Cooperative shall revise its membership agreement to permit members to authorize Beltrami to release account information to Energy Assistance Program agencies when members incur arrearages of 60 days or more.
13. Beltrami Electric Cooperative shall revise its policies regarding late fees and penalty fees to comply with Minn. Stat. § 216B.098, subd. 4 and Minn. Rules 7820.1750.
14. Beltrami Electric Cooperative shall search its records and identify and list all security deposits from Red Lake customers that exceed the amount of two months' average bills.
15. Beltrami Electric Cooperative shall answer discovery requests designed to permit direct comparisons between Red Lake customers and other Cooperative customers and between the Cooperative's treatment of Red Lake customers and its treatment of other customers, including, at a minimum, questions regarding energy and non-energy charges and questions regarding service deposits obtained and refunded.
16. Beltrami Electric Cooperative shall continue serving Red Lake customers, and shall do so in a non-discriminatory manner, throughout the course of this proceeding, all related proceedings, and all proceedings, investigations, negotiations, administrative actions, and community activities that relate to this complaint or to its underlying issues.
17. Within 60 days of the date of this Order, Beltrami Electric Cooperative shall make a compliance filing detailing and documenting the actions it has taken to comply with the above requirements, providing the information required above, and detailing any future actions it intends to take to ensure compliance with the above requirements.
18. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar
Executive Secretary

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