



**Chairman**  
Jonathan Ness  
**Secretary**  
Randy Keranen

**Commissioners**  
Adam Steffl  
Betsy Stolfa  
Derek Schansberg

Tuesday, April 09, 2019

Ms. Lori Spence  
Deputy General Counsel  
Midwest ISO  
P.O. Box 4202  
Carmel, IN 46082-4202

Re: Submittal of Attachments O and GG and Supporting Work Papers to the Midwest ISO

Dear Ms. Spence:

The accompanying Attachment O and Attachment GG (if applicable), along with any other supporting workpapers requested by the Midwest ISO submitted for the Delano Water, Light, and Power Commission (“Delano”) are based on the audited financial statements and underlying financial records for the electric utility for the year ended December 31, 2017. The expenses, assets, liabilities and proprietary capital data provided by Delano in the EIA Form 412, Attachment O, Attachment GG and supporting workpapers are consistent with the Uniform System of Accounts cited in the EIA Form 412 template (which Delano will continue to use so long as the Midwest ISO requires the EIA Form 412 template).

Allocations of expenses made in the Delano’s financial statements are based on historical cost allocation reviews conducted by the electric utility staff. These cost allocations have been audited by certified professional accountants and are an accurate representation of the financial condition of the electric utility. Delano will notify the Midwest ISO in writing, explaining the new allocation methodology, before changing the methodology used to allocate these expenses in future financial statements and in its Attachment O, Attachment GG and supporting workpaper submittals to the Midwest ISO. Christopher Hart confirms that Delano’s audited financial statements and workpapers submitted with the Attachment O and Attachment GG data will be publicly available for review and inspection.

Delano is not a jurisdictional utility under the Federal Power Act and Federal Energy Regulatory Commission regulations. Therefore, it does not file a Form 1 nor keep its books and records in accordance with the Uniform System of Accounts. However, the Central Minnesota Municipal Power Agency of which Delano is a member has completed an EIA Form 412 consistent with historical allocations and record keeping. Delano confirms that these allocations and categorizations of rate base balances and expense detail are reasonable and consistent with the intent of the Midwest ISO’s Attachment O, EIA Form 412 templates and the Uniform System of Accounts.

Very truly yours,

Christopher Hart  
Finance Director  
Delano Water, Light, and Power Commission  
Delano, Minnesota