



March 25, 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 Workpapers to the Midwest ISO

Dear Ms. Spence:

The accompanying Attachment O and Attachment GG, along with any other supporting workpapers requested by the Midwest ISO submitted for the City of Windom ("Windom") 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 Windom 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 Windom will continue to use so long as the Midwest ISO requires the EIA Form 412 template).

Allocations of expenses made in Windom'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. Windom 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 workpapers submittals to the Midwest ISO. Chelsie Carlson confirms that Windom's audited financial statements and workpapers submitted with the Attachment O and Attachment GG data will be publicly available for review and inspection.

Windom 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 Windom is a member has completed an EIA Form 412 consistent with historical allocations and record keeping. Windom 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,

Chelsie Carlson
Finance Director/Controller
City of Windom