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January 2011

Minnesota Local Government Pay Equity Compliance Report

Submitted to the Minnesota Legislature by Minnesota Management & Budget

400 Centennial Office Building 658 Cedar Street St. Paul, MN 55155

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Executive Summary

Minnesota Management & Budget (MMB) is responsible for the enforcement of the Local Government Pay Equity Act (Minnesota Statutes 471.991 - .999 and Minnesota Rules Chapter 3920).

This year MMB completed a major project to upgrade the software local governments use to submit reports. The software is now a web-based application and enables local governments to submit reports with the click of a button. The new software greatly simplifies the reporting process for the local governments and improves MMB's efficiency in managing the program.

The Local Government Pay Equity Act applies to about 1,500 local governments in Minnesota, and affects a total of about 220,000 local government employees. Jurisdictions are scheduled to report on a three-year cycle, meaning that MMB receives approximately 500 reports each year.

Overall, local governments have achieved a high level of compliance - both in meeting reporting requirements and implementing pay equity for their employees. The success of this program is largely attributable to the ongoing assistance and monitoring provided by the MMB Pay Equity Unit and to the commitment on the part of local governments.

When reports were submitted in 2010, the initial analysis showed that approximately 75% of the 495 jurisdictions reporting were in compliance and approximately 25% were either out of compliance or their reports needed further correction or clarification. This is typical of previous reporting results. Historically, approximately one-fourth to one-third of reporting jurisdictions have been initially found out of compliance. With MMB's assistance, most of the non-complying jurisdictions and those whose reports needed corrections have achieved compliance. At this time, 462 (94%) of the jurisdictions reporting in 2010 are in compliance, 23 (5%) remain out of compliance and 10 (1%) need further clarification or correction.

While a jurisdiction may have achieved equitable compensation and be in compliance for one reporting cycle, this does not guarantee that all future reports will be in compliance. Therefore, it is important for local governments to continually review their pay structure and submit reports every three years to the State for review and analysis. This on-going requirement to report prevents regression into inequitable compensation practices and reduces sex-based wage disparities in public employment throughout Minnesota.

About This Report

Minnesota Management & Budget (MMB) is responsible for enforcement of the Local Government Pay Equity Act, and is required to submit an annual report to the state legislature regarding local government pay equity compliance. Minnesota Statute (M.S.) 471.999 states:

The report must include a list of the political subdivisions in compliance with section 471.992, subdivision 1, and the estimated cost of compliance. The report must also include a list of political subdivisions found by the commissioner to be not in compliance, the basis for that finding, recommended changes to achieve compliance, estimated cost of compliance, and recommended penalties, if any. The commissioner's report must include a list of subdivisions that did not comply with the reporting requirements of this section. The commissioner may request, and a subdivision shall provide, any additional information needed for the preparation of a report under this subdivision.

The 2011 Minnesota Local Government Pay Equity Report was prepared entirely by MMB staff as part of routine work assignments. Twenty copies of the report were printed in-house. The cost of staff time to prepare the report was approximately \$490.

This document can be made available, upon request, in alternate formats such as large print, Braille or audiotape.

Questions regarding this report may be directed to the state pay equity coordinator at (651) 259-3761.

Section One Background Information

Requirements of the Law

The Local Government Pay Equity Act (LGPEA) of 1984 (M.S. 471.991 to 471.999) required local governments to "establish equitable compensation relationships" by December 31, 1991. Other common terms for "equitable compensation relationships" are "comparable worth" or "pay equity." Compliance must be maintained and jurisdictions are periodically evaluated. Jurisdictions are on a three-year reporting cycle with approximately 500 jurisdictions reporting each year.

The purpose of the law is "to eliminate sex-based wage disparities in public employment in this state." Equitable compensation relationships are achieved when "the compensation for female-dominated classes is not consistently below the compensation for male-dominated classes of comparable work value... within the political subdivision."

The law requires MMB to determine whether local governments have achieved pay equity, based on implementation reports submitted by local governments.

Responsibilities of Minnesota Management & Budget

A. Pay Equity Rule Adopted

In 1991, the Legislature authorized MMB to adopt rules under the Administrative Procedures Act to assure compliance with the Local Government Pay Equity Act (Laws 1991, chapter 128, section 2).

That same year, MMB asked employer organizations, unions, and women's groups to name representatives to serve on a rulemaking advisory committee. This 30-member group met to discuss and review compliance guidelines and advise the department on the pay equity rule. MMB adopted the rule MCAR 3920, October 1992.

B. Assistance to Local Governments

In 1989, MMB established a full-time pay equity coordinator position. The coordinator has assisted local governments through extensive training, consultation, and analysis of their pay equity reports.

MMB has communicated through various means with the approximately 1,500 local governments required to comply with the law. The department has produced numerous free technical assistance publications available at no cost to the jurisdiction.

MMB has periodically offered training sessions, and thousands of individuals from local governments throughout the state have attended. MMB has also developed videos and DVD's explaining reporting requirements, compliance requirements and job evaluation methodology.

In 2010, MMB developed and launched a new highly efficient web-based software program to help jurisdictions submit reports, determine the underpayment of female job classes and calculate the results for several of the compliance tests. The new software replaces an older downloadable version and local government staff has indicated it is much more user-friendly.

In addition to ongoing daily technical assistance, the state pay equity coordinator conducted the following major activities in 2010.

Pay Equity Implementation Reports

• Analysis of Pay Equity Reports

Completed an initial review of the 495 reports submitted in January of 2010. After the initial analysis of the reports, approximately 75% were in compliance and 25% were either out of compliance or needed further clarification or corrections. All non-complying jurisdictions were required to submit new reports with current data, resulting in the analysis of approximately 100 "second reports." Currently, approximately 94% are in compliance, 5% are out of compliance and 1% need further clarification or correction. All jurisdictions that are out of compliance and those whose reports need correction or clarification require considerable follow-up work. This may involve several preliminary reports and investigations to verify accuracy.

• Notification Packet

Prepared and emailed the reporting "notification packet" to approximately 500 jurisdictions required to report in 2011. Instead of mailing the notice and hard copies of the instruction booklet and guidebook, the notice directed users to MMB's Web site for these materials. The notice also included directions for using the new pay equity software.

• Cost Containment

Continued ongoing efforts to contain costs including extensive use of electronic communication between MMB and local governments instead of regular mail. This included the notice to report, notice of compliance, reporting and compliance requirements, and follow up communication regarding incomplete reports, inaccurate reports or reports not in compliance.

2010 Annual Report to Legislature

Prepared the report to the legislature on the status of compliance and noncompliance regarding each local government.

• Communication Regarding Non-Compliance

Continued ongoing communication to jurisdictions regarding the need to submit new reports to achieve compliance.

Prepared materials, evaluated evidence and continued coordination of an internal team of MMB staff to review and make decisions regarding reconsideration requests and requests for suspension of penalties.

• Provided consultation and technical assistance to jurisdictions that were found out of compliance and developed strategies to achieve compliance and avoid any potential penalties.

• State Job Match Job Evaluation System Training

Completed a new DVD on job evaluation and use of the free State Job Match job system for evaluating jobs. This manual has been regularly updated and distributed free of charge since 1984. This provides jurisdictions with an "in-house" option for evaluating jobs in terms of skill, effort, responsibility and working conditions. The booklet includes hundreds of job matches, describes how to access over 1,800 state job descriptions and outlines instructions for evaluating jobs. All information is available on MMB's Web site.

Ongoing Activities

• Instructional DVD & Technical Assistance

Continued distribution of the DVD's, "Pay Equity Reporting and Compliance Requirements" and "Job Evaluation Training" to interested parties at a nominal cost of \$15 each.

Provided technical assistance and guidance for achieving compliance on a daily basis to local governments, employees and the general public via phone calls, emails, letters and faxes.

Provided testimony and written materials to members of the legislature and legislative commissions and/or committees.

• MMB Web Site

Continued to maintain and update MMB's pay equity Web page and the State Job Match manual. The web page also includes pay equity reporting instructions, compliance requirements and pay equity analysis software. All are available on the web free of charge.

Section Two Tests for Compliance

A. Tests for Compliance

The tests for compliance are summarized below. Complete details for each of the tests can be found in Minnesota Rules Chapter 3920. The "recommended action" after each is a brief overview of the general advice MMB gives to jurisdictions that did not pass a particular test. Reports to each jurisdiction are individualized and identify specific problems and requirements to pass the compliance test(s).

1. **Completeness and accuracy test (CA)** - determines whether jurisdictions have filed reports on time, included correct data and supplied all required information.

Recommended action: Supply any required information not included in the report, make certain all data is correct and submit report by the required date.

2. **Statistical analysis test (ST)** - compares salary data to determine if female classes are paid consistently below male classes of comparable work value (job points). Software is used to calculate this test. For smaller jurisdictions, the alternative analysis is used instead of the statistical analysis.

Recommended action: Adjust salaries to reduce the number of female classes compensated below male classes of comparable value, or reduce the difference between the average compensation for male classes and female classes to the level where it is not statistically significant.

3. Alternative analysis test (ALT) - compares salary data to determine if female classes are paid below male classes even though the female classes have similar or greater work value (job points). Also evaluates the compensation for female classes rated lower than all other classes to see if it is as reasonably proportionate to points as other classes.

Recommended action: *Eliminate the amount of the inequity identified between the salaries for female classes and male classes.*

4. **Salary range test (SR)** - compares the average number of years it takes for individuals in male and female classes to reach the top of a salary range. This test only applies to jurisdictions that have classes where there are an established number of years to move through salary ranges.

Recommended action: Bring more consistency to the average number of years it takes to move through a salary range for male and female classes to meet the minimum standard for passing the test.

5. **Exceptional service pay test (ESP)** - compares the number of male classes in which individuals receive longevity or performance pay above the maximum of the salary range to the number of female classes where this occurs. This test applies only to jurisdictions that provide exceptional service pay.

Recommended action: Bring more consistency to the number of male and female classes receiving exceptional service pay to meet the minimum standard for passing the test.

B. Summary of Tests Failed After Initial Analysis

The following is a summary of 495 reports submitted in 2010. Of the 99 jurisdictions whose reports were initially found out of compliance, 64% failed the completeness and accuracy test. Approximately 30% failed either the statistical or alternative analysis test (the tests that compare salaries and indicate wage inequities). A specific breakdown regarding each test follows:

Test Failed	Number
Completeness and Accuracy Test	63
Statistical Analysis Test	5
Alternative Analysis Test	25
Salary Range Test	3
Exceptional Service Pay Test	3
Total	99

Section Three Summary of Compliance Status of Local Governments

Due to the three-year reporting cycle that began in 1994, the current compliance status of local governments includes a composite of results from the years 2008, 2009, and 2010. At this time, 97% of all jurisdictions are in compliance.

Jurisdiction	In	Out of	Decision	
Туре	Compliance	Compliance	Pending	Total
City	625	13	5	643
County	85	1	1	87
Schools	325	8	5	338
Soil & Water	81	0	1	82
Conservation				
Districts				
(SWCDs)				
Other Districts	131	0	0	131
Housing and	74	0	0	74
Redevelopment				
Authorities				
(HRAs)				
Townships	76	1	0	77
Utilities	45	0	0	45
Health Care Fac.	40	0	1	41
TOTAL	1482	23	13	1518

Summary of Compliance Status by Jurisdictional Type - Composite 2008, 2009 & 2010

Compliance Status of 2010 Reports

After the initial analysis of the 495 reports submitted in 2010, 370 (75%) were in compliance, 99 (20%) were found out of compliance, and 26 (5%) needed further clarification. Currently (94%) are in compliance, (5%) are out of compliance and the decision is pending for 1%. Over two-thirds of the jurisdictions initially found out of compliance have now achieved compliance.

Jurisdictions found out of compliance were given a grace period of at least 90 days to make adjustments and submit new second reports. Non-complying jurisdictions were also given 30 days to file reconsideration requests if they wanted the grace period extended or wanted to explain their particular circumstances and seek a reversal of MMB's decision. A few of the 99 jurisdictions initially found out of compliance exercised their option to request reconsideration.

Jurisdictions failing to achieve compliance within the grace period and found out of compliance a second time, may be subject to a penalty.



Compliance Status of 2010 Reports

Inequities Identified in Reports Submitted in 2010

For the past several reporting years, MMB has examined the inequities found in jurisdictions that were not in compliance to determine how the wage gap between comparable male and female job classes changed after pay equity wage increases were given. This report includes examples of inequities that were found and corrected in some of the jurisdictions that were found out of compliance.

Inequities were identified in instances where females were paid less than males even though their job evaluation ratings indicated that the females should be paid at least equal to the males. In addition, disparities could not be accounted for by length of service or performance differences. For example, a female in the position of city clerk, rating of 275 points, was paid less than a male in a maintenance position with a rating of 213 points. The dollar amounts of such inequities were calculated and appear below.

Typical inequities in cities were found primarily between city clerks and maintenance workers. In schools, female classes of secretaries, food service workers and teacher aides were paid less than male classes such as custodians.

The examples below show that wages for females were adjusted an average of \$1.59 per hour or 10%. Before the inequities were corrected, the average pay for females in the examples was \$16.27 per hour. After adjustments were made, the average pay for females was \$17.86 per hour. Prior to the adjustments, females were paid 83% of what males were paid, but after the adjustments, the wage gap narrowed and females were paid 91% of what males were paid.

Position	Hourly Wage "Before"	Hourly Wage "After"	Difference
Admin. Asst. Admin. Asst. Admin/ Clerk-Treas. City Clerk/Treas. City Clerk/Treas. Librarian Office Clerk Planner GIS Spec. Program Specialist Secretary Secretary	12.00 16.44 18.99 15.39 13.63 10.88 16.86 29.50 14.42 9.20 18.72	12.45 25.45 19.25 17.64 14.32 11.55 17.42 30.42 17.31 9.55 19.41	.45 9.02 .26 2.25 .69 .67 .56 .92 2.89 .35 .69
Utility Billing Clerk	19.28	19.64	.36
Averages	\$16.27	\$17.86	\$1.59

Examples of Inequities Identified in 2010 Reports

Section Four Jurisdictions Not in Compliance

A. Jurisdictions Not in Compliance - Penalty May Be Assessed

The jurisdictions listed below have all received a "first notice of non-compliance" but at this time no penalties have been assessed. Some of the jurisdictions on this list have recently submitted second reports yet to be reviewed or they submitted reconsideration requests. Any jurisdiction on this list could receive a penalty notice at a later time if they fail to submit a new report that passes all compliance tests. The specific actions MMB recommended to each jurisdiction to achieve compliance are described in section two.

The abbreviations for the tests for compliance used in this section are: CA – completeness and accuracy; ST – statistical salary comparison analysis; ALT – alternative salary comparison salary analysis; SR – salary range and ESP – exceptional service pay. A complete description of each of these tests can be found in section two of this report.

Jurisdiction	Test(s) Failed	Est. Monthly Cost to Achieve Compliance	Cost as % Payroll
Cities			
Beaver Bay	CA	*	0.1
Calumet	ALT	*	0.1
Ellendale	ALT	230	1.7
Grand Meadow	ALT	443	2.0
Heron Lake	CA	*	0.1
Maple Plain	ALT	*	0.1
Odessa	CA	*	0.1
Preston	ST.	*	0.1
Rainer	CA	*	0.1
Sleepy Eye	CA	*	0.1
St. Bonifacius	ALT	250	1.4
St. Clair	ALT	450	3.9
St. Paul Park	ST	300	0.2
Counties			
Waseca	ESP	*	0.1
School Districts			
ISD No. 84 Sleepy Eye	CA	*	0.1
ISD No. 93 Carlton	SR	*	0.1
ISD No. 186 Pequot Lakes	ST	*	0.1
ISD No. 473 Isle	ALT	350	0.1
ISD No. 533 Dover-Eyota	CA	*	0.1
ISD No. 696 Ely	SR	*	0.1
ISD No. 832 Mahtomedi	ST	480	0.1
ISD No. 2859 Glencoe/Sil. Lake	ALT	*	0.1

Townships Pike BayTownship

*

CA

0.1

*Data to calculate a specific amount was not available to MMB at the time of this report, but based on MMB analysis of average costs, MMB estimates that the cost would not exceed 0.1% of payroll and would probably be less.

B. Jurisdictions Not in Compliance - Penalties Assessed

At this time there are no jurisdictions that have received a second notice of non-compliance with the Local Government Pay Equity Act and a notice that they are subject to a penalty. If there were any jurisdictions in this category, MMB would have specified the reason for non-compliance, recommended actions to achieve compliance and estimated the cost of achieving for compliance for each of these jurisdictions.

Prior to any penalties being assessed, a jurisdiction subject to a penalty would have had several opportunities to avoid such a notice including a first notice of non-compliance and a grace period to make corrections and achieve compliance. In addition, non-compliant jurisdictions would have been:

- Warned that failure to achieve compliance by the end of the grace period would result in a second notice of non-compliance and a penalty notice. Also, that the penalty would be the greater of a 5% reduction in state aid or \$100 per day assessed from the original deadline for compliance and would continue until compliance was achieved.
- Advised of the reason they were found out of compliance, the results of the tests for compliance and an explanation of the results.
- Encouraged to contact MMB for technical assistance and review of potential salary and other adjustments to see if they would meet compliance requirements.
- Advised to request reconsideration if they wished to explain circumstances and ask for a reversal of MMB's decision, or request an extension of the grace period to achieve compliance.
- Sent a courtesy reminder letter from MMB 30 days prior to the end of their grace period reminding them of the deadline for achieving compliance and submitting a new report.

Any penalized jurisdiction would have had the option to request a suspension of the penalty and/or file a contested case appeal. Penalties may not be imposed while an appeal is pending.

The law allows MMB to consider the following factors when deciding whether to suspend any portion of a penalty: circumstances beyond a jurisdiction's control, severe hardship, non-compliance due to factors unrelated to gender, and steps the jurisdiction has taken to achieve compliance. Jurisdictions also have the option to submit a contested case appeal on the new penalty amounts.

Because penalties continue until compliance is achieved, jurisdictions that do not achieve compliance are subject to additional penalties. No penalties may be imposed until the end of the legislative session in which MMB submits a report listing a jurisdiction as not in compliance. MMB makes compliance decisions on an ongoing basis and updates the legislature annually.

C. Jurisdictions Not in Compliance – Penalties Resolved

A total of 96 penalty cases have been resolved over the past 14 years resulting in \$1,267,851.00 in total restitution paid to approximately 1300 employees for past inequities. A total of \$210,233 has been collected in penalties. The penalties go to the general fund and not to MMB.

Section Five Jurisdictions in Compliance

Cities Ada Adams Adrian Afton Aitkin Akeley Albany Albert Lea Albertville Alden Alexandria Alpha Altura Alvarado Amboy Andover Annandale Anoka Apple Valley Appleton Arden Hills Arlington Arco Argyle Ashby Askov Atwater Audubon Aurora Austin Avoca Avon Babbitt Backus Badger Bagley Balaton Barnesville Barnum Barrett Battle Lake Baudette Bayport Beardsley Becker Belgrade **Belle** Plaine Bellingham Belview Bemidji Benson Bertha Bethel **Big Falls Big** Lake **Bigfork**

Birchwood

Birchwood Village Bird Island Biwabik Blackduck Blaine **Blooming Prairie** Bloomington Blue Earth Bovey Boyd Braham Brainerd Brandon Breckenridge Breezy Point Brewster Bricelyn Brooklyn Center Brooklyn Park Brooten Browerville Brownsville Brownton Brownsvalley Buffalo Buffalo Lake Buhl Burnsville Butterfield Byron Caledonia Callaway Cambridge Canby Cannon Falls Canton Carlos Carlton Carver Cass Lake Center City Centerville Ceylon Champlin Chandler Chanhassen Chaska Chatfield Chisago City Chisholm Chokio **Circle Pines** Clara City Claremont Clarissa Clarkfield Clarks Grove Clear Lake

Clearbrook Clearwater Clements Cleveland Climax Clinton Clontarf Cloquet Cohasset Cokato Cold Spring Coleraine Cologne Columbia Heights Columbus Comfrey Cook Coon Rapids Corcoran Cosmos Cottage Grove Cottonwood Cromwell Crookston Crosby Crosslake Crystal Currie Danvers Danube Darwin Dassel Dawson Dayton De Graff Deephaven Deer River Deerwood Delano Dellwood Detroit Lakes Dilworth Dodge Center Donnelly Duluth Dundas Dundee Dunnell Eagan Eagle Bend Eagle Lake East Bethel East Grand Forks East Gull Lake Echo Eden Prairie Eden Valley Edgerton

Edina Elbow Lake Elgin Elizabeth Elk River Elko New Market Ellsworth Elmore Ely Elysian Emily Emmons Erhard Erskine Evansville Eveleth Excelsior Eyota Fairfax Fairmont Falcon Heights Faribault Farmington Fergus Falls Fertile Fifty Lakes Finlayson Flensburg Floodwood Foley Forest Lake Foreston Fosston Fountain Franklin Frazee Freeborn Freeport Fridley Frost Fulda Gary Gaylord Geneva Gibbon Gilbert Glencoe Glenville Glenwood Glyndon Golden Valley Gonvick Good Thunder Goodview Grand Marais Grand Rapids Grant Granite Falls Green Isle Greenbush Greenfield Grey Eagle Grove City Grygla Hackensack

Hallock Halstad Ham Lake Hamberg Hampton Hancock Hanley Falls Hanover Hanska Harmony Harris Hartland Hastings Hawley Hayfield Hayward Hector Henderson Hendricks Hendrum Henning Herman Hermantown Hewitt Hibbing Hill City Hills Hilltop Hinckley Hitterdal Hoffman Hokah Hollandale Hopkins Houston Howard Lake Hoyt Lakes Hugo Hutchinson Independence International Falls Inver Grove Heights Ironton Isanti Isle Ivanhoe Jackson Janesville Jasper Jeffers Jordan Kandiyohi Karlstad Kasota Kasson Keewatin Kelliher Kellogg Kennedy Kerkhoven Kettle River Kiester Kimball Kinney La Crescent

La Prairie Lafayette Lake Benton Lake Bronson Lake City Lake Crystal Lake Elmo Lake Lillian Lake Park Lake Shore Lake St. Croix Beach Lake Wilson Lakefield Lakeland Lakeville Lamberton Lancaster Lanesboro Lauderdale Le Center Le Sueur LeRoy Lester Prairie Lewiston Lexington Lewisville Lindstrom Lino Lakes Lismore Litchfield Little Canada Little Falls Littlefork Long Lake Long Prairie Longville Lonsdale Loretto Lucan Luverne Lyle Lynd Mabel Madelia Madison Madison Lake Mahnomen Mahtomedi Mankato Mantorville Maple Grove Maple Lake Mapleton Mapleview Maplewood Marble Marietta Marine on St. Croix Marshall Mayer Maynard Mazeppa McGregor McIntosh Medford

Medina Melrose Menahga Mendota Heights Mentor Milaca Milan Millerville Milroy Miltona Minneapolis Minneota Minnesota Lake Minnetonka Minnetonka Beach Minnetrista Montevideo Monticello Montrose Moorhead Moose Lake Mora Morgan Morris Morristown Morton Motley Mound Moundsview Mountain Iron Mountain Lake Murdock Nashwauk Nerstrand Nevis New Auburn New Brighton New Hope New London New Prague New Richland New Ulm New York Mills Newfolden Newport Nicollet Nisswa North Branch North Mankato North Oaks North St. Paul Northfield Northome Norwood Young America Nowthen Oak Grove Oak Park Heights Oakdale Ogema Ogilvie Okabena Oklee Olivia Onamia Orono

Oronoco Orr Ortonville Osakis Oslo Ostrander Otsego Owatonna Palisade Park Rapids Parkers Prairie Paynesville Pelican Rapids Pemberton Pennock Pequot Lakes Perham Peterson Pierz Pillager Pine City Pine Island Pine River Pipestone Plainview Plato Plymouth Princeton Prinsburg Prior Lake Proctor Ramsey Randall Raymond Red Lake Falls Red Wing Redwood Falls Remer Renville Rice Richfield Richmond Robbinsdale Rochester Rock Creek Rockford Rockville Rogers Rollingstone Roseau Rose Creek Rosemount Roseville Rothsav Round Lake Royalton Rush City Rushford Rushford Village Rushmore Russell Ruthton Sacred Heart Sanborn Sandstone

Sartell Sauk Rapids Savage Scandia Scanlon Shafer Shakopee Shelly Sherburn Shoreview Shorewood Silver Bay Slayton South Haven South St. Paul Spicer Spring Grove Spring Lake Park Spring Park Spring Valley Springfield St. Anthony St. Augusta St. Charles St. Cloud St. Francis St. Hilaire St. James St. Joseph St. Leo St. Louis Park St. Michael St. Paul St. Peter Stacy Staples Starbuck Stephen Stewart Stewartville Stillwater Stockton Storden Swanville Taconite Thief River Falls Thomson Tonka Bay Tower Trimont Truman Twin Valley Tyler Ulen Underwood Vadnais Heights Vergas Verndale Vernon Center Vesta Victoria Virginia Wabasha Wabasso Waconia

Wadena Wahkon Waldorf Walker Walnut Grove Walters Wanamingo Warren Warroad Waseca Watertown Waterville Watkins Watson

Counties

Aitkin County Anoka County Becker County Beltrami County Benton County **Big Stone County** Blue Eartch County Brown County Carlton County Carver County Cass County Chippewa County Chisago County Clay County Clearwater County Cook County Cottonwood County Crow Wing County Dakota County Dodge County **Douglas County** Faribault County Fillmore County Freeborn County Goodhue County Grant County Hennepin County Houston County Hubbard County Isanti County Itasca County Jackson County Kanabec County Kandiyohi County Kittson County Koochiching County Lake County Lake of the Woods County LeSueur County Lincoln County Lvon County Mahnomen County Marshall County

Waubun Waverly Welcome Wells West Concord West Concord West St. Paul Westbrook Wheaton White Bear Lake Willernie Williams Williams Williams Williams Williams Williams Williams Williams

Martin County McLeod County Meeker County Mille Lacs County Morrison County Mower County Murray County Nicollet County Nobles County Norman County Olmstead County Otter Tail County Pennington County Pine County Pipestone County Polk County Pope County Ramsey County Red Lake County Redwood County Renville County Rice County Rock County Roseau County Scott County Sherburne County Sibley County St. Louis County Stearns County Steele County Stevens County Swift County Todd County Traverse County Wabasha County Wadena County Washington County Watonwan County Wilkin County Winona County Wright County Yellow Medicine County

Winona

Winsted

Winton

Winthrop

Wolf Lake

Wolverton

Wood Lake

Woodbury Worthington

Wrenshall

Wyoming

Zumbrota

Zimmerman

Wykoff

Health Care Facilities

Appleton Municipal Hospital Avera Marshall Regional Medical Center Cedarview Nursing Home Chippewa County Montevideo Hospital Cook County North Shore Hospital Cook-Orr Health Care District Cottonwood/Jackson Community Health Service Countryside Public Health Cuyuna Range Hospital District Douglas County Hospital Glacial Ridge Hospital Goodhue County Public Health Granite Falls Municipal Hospital Hennepin County Medical Center Heritage Living Center Inter County Nursing Service Itasca Nursing Home Johnson Memorial Health Services

Housing and Redevelopment Authorities

Aitkin County HRA **Bagley Housing Authority** Barnesville HRA Benson HRA Big Stone County HRA Blue Earth HRA Brainerd HRA Breckenridge HRA Carver County HRA Cass County HRA Cass Lake HRA Chippewa County HRA Chisholm HRA Clay County Housing and Redevelopment Authority Clearwater County HRA Cloquet HRA Cook HRA Cottonwood HRA Crookston HRA Crosby HRA Dakota County CDA Detroit Lakes HRA Duluth HRA East Grand Forks HRA Economic Dev. Auth. E. Grand Forks Ely HRA Eveleth HRA Fairmont HRA Fergus Falls HRA Grand Rapids HRA Hibbing HRA International Falls HRA Litchfield HRA Little Falls HRA Luverne HRA Madison HRA

L.L.M.P Public Health Service Lakewood Health System New River Medical Center Mercy Hospital and Health Care Center Nobles Rock Public Health Care Service Norman-Mahnomen Public Health Northfield City Hospital Ortonville Area Health Service Parkview Manor Nursing Home Paynesville Community Hospital Pelican Valley Health Center Perham Hospital District Quin County Community Health Service Redwood Area Hospital Rivers Edge Hospital & Clinic Sleepy Eye Municipal Hospital South Country Health Alliance Stevens-Traverse-Grant Public Health Joint Powers Sunrise Nursing Home United Hospital District Worthington Regional Hospital

Marshall Public Housing Commission Montevideo HRA Moorhead HRA Morrison County HRA Mountain Lake HRA Mower County HRA New Richland HRA North Mankato HRA Northwest Multi-County HRA Pequot Lakes HRA Pine City HRA Pine River HRA Pipestone HRA Princeton HRA Red Lake Falls HRA Red Wing HRA Redwood Falls HRA SE Minnesota Multi-County HRA Sleepy Eye HRA South St. Paul HRA St. Cloud HRA St. James HRA St. Peter HRA Swift County HRA Thief River Falls HRA Todd County HRA Tracy HRA Virginia HRA Wadena HRA Walker HRA Warren HRA Waseca HRA Washington County HRA Willmar HRA Windom HRA Winona HRA Worthington HRA

Independent School Districts

ISD No. 1 Aitkin ISD No. 1A Minneapolis ISD No. 2 Hill City ISD No. 4 McGregor ISD No. 6 South St. Paul ISD No. 11 Anoka-Hennepin ISD No. 13 Columbia Heights ISD No. 14 Fridley ISD No. 15 St. Francis ISD No. 16 Spring Lake Park ISD No. 22 Detroit Lakes ISD No. 23 Frazee ISD No. 25 Pine Point ISD No. 31 Bemidji ISD No. 32 Blackduck ISD No. 36 Kelliher ISD No. 38 Red Lake ISD No. 47 Sauk Rapids ISD No. 51 Foley ISD No. 62 Ortonville ISD No. 75 St. Clair ISD No. 77 Mankato ISD No. 81 Comfrey ISD No. 85 Springfield ISD No. 88 New Ulm ISD No. 91 Barnum ISD No. 94 Cloquet ISD No. 95 Cromwell-Wright ISD No. 97 Moose Lake ISD No. 99 Esko ISD No. 108 Norwood Young America ISD No. 110 Waconia ISD No. 111 Watertown ISD No. 113 Walker-Akeley ISD No. 115 Cass Lake-Bena ISD No. 116 Pillager ISD No. 118 Northland Community ISD No. 129 Montevideo ISD No. 138 North Branch Area Schools ISD No. 139 Rush City ISD No. 146 Barnesville ISD No. 150 Hawley ISD No. 152 Moorhead ISD No. 162 Bagley ISD No. 166 Cook County ISD No. 173 Mountain Lake ISD No. 177 Windom ISD No. 181 Brainerd ISD No. 182 Crosby-Ironton ISD No. 191 Burnsville-Eagan-Savage ISD No. 192 Farmington ISD No. 194 Lakeville ISD No. 195 Randolph ISD No. 196 Rosemount Apple Valley Eagan ISD No. 197 West St. Paul ISD No. 199 Inver Grove Hgts. ISD No. 200 Hastings ISD No. 203 Hayfield ISD No. 206 Alexandria ISD No. 207 Brandon ISD No. 208 Evansville ISD No. 213 Osakis

ISD No. 227 Chatfield ISD No. 229 Lanesboro ISD No. 238 Mabel-Canton ISD No. 239 Rushford-Peterson ISD No. 241 Albert Lea ISD No. 242 Alden ISD No. 252 Cannon Falls ISD No. 253 Goodhue ISD No. 255 Pine Island ISD No. 256 Red Wing ISD No. 261 Ashby ISD No. 264, Herman-Norcross ISD No. 270 Hopkins ISD No. 271 Bloomington ISD No. 272 Eden Prairie ISD No. 273 Edina ISD No. 276 Minnetonka ISD No. 277 Westonka ISD No. 278 Orono ISD No. 279 Osseo ISD No. 280 Richfield ISD No. 281 Robbinsdale ISD No. 282 St. Anthony-New Brighton ISD No. 283 St. Louis Park ISD No. 284 Wayzata ISD No. 286 Brooklyn Center ISD No. 288 Clinton Graceville Beardsley ISD No. 294 Houston ISD No. 297 Spring Grove ISD No. 299 Caledonia ISD No. 300 LaCrescent-Hokah ISD No. 306 LaPorte ISD No. 308 Nevis ISD No. 309 Park Rapids ISD No. 314 Braham ISD No. 316 Greenway ISD No. 317 Deer River ISD No. 318 Grand Rapids ISD No. 319 Nashwauk-Keewatin ISD NO. 330 Heron Lake Okabena ISD No. 332 Mora ISD No. 333 Ogilvie ISD No. 342 New London - Spicer ISD No. 347 Willmar ISD No. 356 Lancaster ISD No. 361 International Falls ISD No. 362 Littlefork-Big Falls ISD No. 363 South Koochiching ISD No. 371 Bellingham ISD No. 378 Dawson ISD No. 381 Lake Superior ISD No. 390 Lake of the Woods ISD No. 391 Cleveland ISD No. 392 LeCenter ISD No. 394 Montgomery ISD No. 404 Lake Benton ISD No. 413 Marshall ISD No. 414 Minneota ISD No. 415 Lynd ISD No. 423 Hutchinson ISD No. 424 Lester Prairie ISD No. 432 Mahnomen

ISD No. 435 Waubun-Ogema-White Earth Community Schools

ISD No. 441 Marshall County ISD No. 447 Grygla ISD No. 458 Truman ISD No. 463 Eden Valley ISD No. 465 Litchfield ISD No. 466 Dassel-Cokato ISD No. 477 Princeton ISD No. 480 Onamia ISD No. 482 Little Falls ISD No. 484 Pierz ISD No. 485 Royalton ISD No. 486 Swanville ISD No. 487 Upsala Area Schools ISD No. 492 Austin ISD No. 495 Grand Meadow ISD No. 497 Lyle ISD No. 499 LeRoy-Ostrander ISD No. 500 Southland ISD No. 505 Fulda ISD No. 507 Nicollet ISD No. 508 St. Peter ISD No. 511 Adrian ISD No. 513 Brewster ISD No. 514 Ellsworth ISD No. 516 Round Lake ISD No. 518 Worthington ISD No. 531 Byron ISD No. 534 Stewartville ISD No. 535 Rochester ISD No. 542 Battle Lake ISD No. 544 Fergus Falls ISD No. 545 Henning ISD No. 547 Parkers Prairie ISD No. 548 Pelican Rapids ISD No. 549 Perham ISD No. 550 Underwood ISD No. 553 New York Mills ISD No. 561 Goodridge ISD No. 564Thief River Falls ISD No. 577 Willow River ISD No. 578 Pine City ISD No. 592 Climax-Shelly ISD No. 595 East Grand Forks ISD No. 599 Fertile - Beltrami ISD No. 600 Fisher ISD No. 601Fosston ISD No. 611 Cyrus ISD No. 621 Mounds View ISD No, 622 North St. Paul ISD No. 623 Roseville ISD No. 624 White Bear Lake ISD No. 625 St. Paul ISD No. 627 Oklee ISD No. 628 Plummer ISD No. 630 Red Lake Falls ISD No. 635 Milroy ISD No. 656 Faribault ISD No. 659 Northfield ISD No. 671 Hills ISD No. 676 Badger ISD No. 682 Roseau ISD No. 690 Warroad ISD No. 695 Chisholm ISD No. 698 Floodwood ISD No. 700 Hermantown

ISD No. 701 Hibbing ISD No. 704 Proctor ISD No. 706 Viginia ISD No. 709 Duluth ISD No. 712 Mountain Iron-Buhl ISD No. 716 Belle Plaine ISD No. 717 Jordan ISD No. 719 Prior Lake Savage ISD No. 720 Shakopee ISD No. 721 New Prague ISD No. 726 Becker ISD No. 727 Big Lake ISD No. 728 Elk River ISD No. 738 Holdingford ISD No. 739 Kimball ISD No. 740 Melrose ISD No. 741 Paynesville ISD No. 742 St. Cloud ISD No. 743 Sauk Centre ISD No. 745 Albany ISD No. 748 Sartell St. Stephen ISD No. 750 Rocori Area Schools ISD No. 756 Blooming Prairie ISD No. 761 Owatonna ISD No. 768 Hancock ISD No. 769 Morris ISD No. 771 Chokio-Alberta ISD No. 775 Kerkhoven-Murdock-Sunburg ISD No. 777 Benson ISD No. 786 Bertha-Hewitt ISD No. 787 Browerville ISD No. 801 Browns Valley ISD No. 803 Wheaton ISD No. 811 Wabasha-Kellogg ISD No. 815 Prinsburg ISD No. 818 Verndale ISD No. 820 Sebeka ISD No. 821 Menahga ISD No. 829 Waseca ISD No. 831 Forest Lake ISD No. 833 South Washington County ISD No. 834 Stillwater ISD No. 836 Butterfield-Odin ISD No. 837 Madelia ISD No. 840 St. James ISD No. 846 Breckenridge ISD No. 850 Rothsay ISD No. 852 Campbell-Tintah ISD No. 857 Lewiston-Altura ISD No. 858 St. Charles ISD No. 861 Winona ISD No. 876 Annandale ISD No. 877 Buffalo ISD No. 879 Delano ISD No. 881 Maple Lake ISD No. 882 Monticello ISD No. 883 Rockford ISD No. 885 St. Michael-Albertville ISD No. 891 Canby ISD No. 911 Cambridge - Isanti ISD No. 912 Milaca ISD No. 914 Ulen-Hitterdal ISD No. 917 Rosemount ISD No. 2071 Lake CrystalGarden City - Vernon Center ISD No. 2125 Triton

ISD No. 2134 United South Central Public Schools ISD No. 2135 Maple River ISD No. 2137 Kingsland Public School ISD No. 2142 St. Louis County Schools ISD No. 2143 Waterville-Elysian-Morristown ISD No. 2144 Chisago Lakes School District ISD No. 2149 Minnewaska ISD No. 2154 Eveleth Gilbert ISD No. 2155 Wadena/Deer Creek ISD No. 2159 Buffalo Lake-Hector ISD No. 2165 Hinckley-Finlayson Pub. School ISD No. 2167 Cottonwood-Wood Lake ISD No. 2169 Murray County Central ISD No. 2170 Staples/Motley ISD No. 2171 Kittson Central School ISD No. 2172 Kenyon/Wanamingo ISD No. 2174 Pine River-Backus Public Schools ISD No. 2176 Warren/Alvarado/Oslo ISD No. 2180 MacCray ISD No. 2184 Luverne ISD No. 2190 Yellow Medicine East ISD No. 2198 Fillmore Central ISD No. 2215 Norman County East ISD No. 2310 Sibley E. Schools ISD No. 2311 Clearbrook-Gonvick ISD No. 2358 Tri County Schools ISD No. 2364 Belgrade-Brooten-Elrosa ISD No. 2365 GFW Gibbon-Fairfax-Winthrop ISD No. 2396 Atwater-Cosmos-Grove City ISD No. 2397 LeSueurHenderson ISD No. 2448 Martin County West Schools

Others

A.L.F. Joint Powers Ambulance Service Anoka Champlin Fire Department Area Special Education Cooperative Arrowhead Library System Arrowhead Region Computing Consortium Arrowhead Regional Development Commission Arrowhead Regional Corrections Bemidji Regional Interdistrict Council Benton/Stearns Education District #6383 BrainerdLakes Regional Airport Commission Brown Nicollet Community Health Board Brown-Nicollet-Cottonwood Clean Water Partnership Carnelian Marine St. Croix Watershed District Carver - Scott Educational Coop. Centennial Lakes Police Dept. Central Minnesota Community Corrections-Corrections Center Central MN Education Resource and Development Council Clear Lake/Clearwater Sewer Authority Cloquet Area Fire Dept. Comfort Lake - Forest Lake Watershed District Dakota Communications Center Duluth Airport Authority Duluth State Convention Center Administrative Board East Central Regional Development Commission East Central Regional Library East Central Solid Waste Commission Fergus Falls Area Special Education Coop 935 Freshwater Education District #6004 Great River Regional Library

ISD No. 2527 Norman County West ISD No. 2534 BOLD, Bird Island-Olivia-Lk. Lillian ISD No. 2536 Granada Huntley East Chain ISD No. 2609 WIN-E-MAC ISD No. 2683 Greenbush/Middle River ISD No. 2687 Howard Lake, Waverly, Winsted ISD No. 2711 Mesabi East ISD No. 2752 Fairmont Area Schools ISD No. 2753 Long Prairie/Grey Eagle ISD No. 2754 Morgan/Franklin ISD No. 2759 Eagle Valley ISD No. 2805 Zumbrota-Mazeppa ISD No. 2835 Janesville-Waldorf-Pemberton ISD No. 2853 Lac Qui Parle Valley ISD No. 2856 Stephen-Argyle Central ISD No. 2860 Blue Earth Area Schools ISD No. 2884 Red Rock Central ISD No. 2886 Glenville-Emmons ISD No. 2889 Lake Park/Audubon ISD No. 2890 Renville County West ISD No. 2895 Jackson County Central ISD No. 2897 Redwood Falls ISD No. 2898 Westbrook Walnut Grove ISD No. 2899 Plainview ISD No. 2902 Russell-Tyler-Ruthton ISD No. 2904 Tracy Area Public Schools NE Metro Intermediate School District 916 ISD No. 6076 Northland Learning Center

Headwaters Regional Development Commission Hennepin South Services Hennepin Technical College Intermediate District 287 Human Services of Faribault and Martin Counties Heron Lake Watershed District International Falls Recreation Commission 61-6026 West Central Education Dist. Kitchigami Regional Library L.O.G.I.S. Lac Qui Parle County Economic Dev. Lac Qui Parle-Yellow BankWatershed District Lake Agassiz Regional Library Lake Agassiz Special Education Cooperative Lakes Country Service Cooperative Lincoln, Lyon and Murray Human Services MAWSECO District No. 938 Metro ECSU Metro Library Service Agency Metro Mosquito Control Metronet Metropolitan Airports Commission Metropolitan Council Metropolitan Library Service Agency (MELSA) Metropolitan Sports Facilities Commission Mid-Minnesota Development Commission Middle River-Snake River Watershed District Midwest Special Education Interdistrict Cooperative Minneapolis Municipal Building Commission Minneapolis Parks and Recreation Board Minneapolis Public Housing Authority Minneapolis Public Library Board Minnehaha Creek Watershed Dist.

Minnesota Counties Information Systems Minnesota River Valley Special Education Cooperative Minnesota Valley Cooperative Center Minnesota Valley Transit Authority Minnesota State High School League Mississippi Headwaters Board Mississippi Watershed Management Organization MN Valley Education District #6027 Nine Mile Creek Watershed District North Central Service Coop 5 North Country Library Cooperative Northeast Service Cooperative Northern Lights Library Network Northwest Hennepin Human Services Council Northwest Regional Development Commission Northwest Regional Library Northwest Service Cooperative Northwest Suburbs Cable Communications Commission NW Regional Inter-District Council No. 382-52 Okabena-Ocheda Watershed District Pelican River Watershed District Pine-Prairie Cooperative Center Pipestone Co. Economic Dev. Pioneerland Library System Plum Creek Library System Prairieland Joint County Compost Facility Prior Lake-Spring Lake Watershed District Public Safety Dept. - Amboy **Ouad Cities Cable** Ramsey County District Court Ramsey/Washington Co. Suburban Cable Communications Comm. II Red Lake Watershed District Redwood-Cottonwood Rivers Control Area Region 5 Development Commission Region I ESV Information Services Region Nine Development Commission Region V Computer Service

Soil and Water Conservation Districts

Aitkin County SWCD Anoka Conservation District Becker SWCD Beltrami SWCD Benton County SWCD Big Stone SWCD Blue Earth County SWCD Brown SWCD Carlton SWCD Carver County SWCD Chippewa County SWCD Clay County SWCD Clearwater SWCD Cottonwood SWCD Crow Wing SWCD Dakota County SWCD Dodge County SWCD Douglas SWCD East Polk SWCD Faribault County SWCD Freeborn SWCD Goodhue SWCD Grant County SWCD

Rice Creek Watershed District River Bend Education District #6049 Rock County Rural Water Rock Nobles Community Corrections S.A.M.M.I.E. Sauk River Watershed District Scott County Community Development Agency (CDA) Seaway Port Authority/Duluth South Central Minnesota Inter-Library Exchange (SMILE) South Lake Minnetonka Public Safety Department South Washington Watershed District Southeast Minnesota Education Service Unit Southeast Service Cooperative Southern Plains Cooperative Southwest & West Central Service Coop Southwest Metro Transit Commission Southwest Regional Development Commission Spirit Mountain Authority St. Cloud Area Planning Organization St. Cloud Metro Transit Commission St. Paul Port Authority St. Paul Public Housing Stearns-Benton Employment and Training Council T.B. Sheldon Performing Arts Theatre Technology Information Educational Services (TIES) Three Rivers Park District Todd Wadena Community Corrections Traverse Des Sioux Library System **Tri-County Community Corrections** Two Rivers Watershed District Upper Minnesota River Watershed District Upper Minnesota Valley Regional Development Comm. Viking Library System Waseca-Le Sueur Regional Library West Central Area Agency on Aging West Hennepin Public Safety Wright Technical Center Yellow Medicine River Watershed District

Hubbard County SWCD Isanti SWCD Itasca County SWCD Kanabec SWCD Kandiyohi SWCD Kittson SWCD Koochiching SWCD Lac Qui Parle SWCD Lake County SWCD Lake Minnetonka SWCD Lake of the Woods SWCD Le Sueur County SWCD Lincoln County SWCD Lyon County SWCD Mahnomen County SWCD Marshall SWCD Marshall-Beltrami SWCD Martin SWCD McLeod SWCD Meeker SWCD Mille Lacs SWCD Morrison SWCD Mower County SWCD

Nicollet SWCD Nobles SWCD Norman County SWCD North St. Louis SWCD Pennington SWCD Pine County SWCD Pipestone County SWCD Pope SWCD Ramsey County SWCD Red Lake County SWCD Redwood County SWCD Renville County SWCD Rice SWCD Root River SWCD Roseau County SWCD Scott County SWCD Sherburne SWCD Sibley County SWCD

Towns

Albion Township Alexandria Township Arbo Township Baldwin Township Balkan Township Beaver Creek Township Belgrade Township Big Lake, Township Biwabik Township Blackberry Township Breitung Township Camden Township Cannon Falls, Township Chisago Lake Township Clearwater Township Cokato Township Corinna Township Embarrass Township Fair Haven Township Fayal Township Fish Lake Township Franconia Township Franklin Township Great Scott Township Greenway Township Harris Township Hassan Township Hollywood Township Ideal Township Iron Range Township Irondale Township Isanti Township Joint Powers Board Cascade/Rochester Township Krain Township Lafayette Township LaGrande Township Laketown Township Lakeview Township Linwood Township

So. St. Louis SWCD Stearns County SWCD Steele County SWCD Stevens SWCD Swift County SWCD Todd SWCD Traverse SWCD Wabasha County SWCD Wadena SWCD Waseca SWCD Watonwan County SWCD Washington Conservation Dist. West Ottertail SWCD West Polk SWCD Wilkin SWCD Winona County SWCD Wright SWCD Yellow Medicine SWCD

Livonia Township Mankato Township Maple Lake Townhsip Marysville Township May Township Middleville Township Millwood Township Monticello Township Mountain Lake Township Nashwauk Township Nessel Township New Haven Township Northern Township Oak Lawn Township Paynesville Township Perch Lake Township Pine City Township Pokegama Township Princeton Township Rice Lake Township Rochester Township Rockford Township Scandia Valley Township Shingobee Township Silver Creek Township - Monticello Silver Creek Township - Two Harbors Stanford Township - Isanti Co. Stillwater Township Sverdrup Township Thomson Township Township Maintenance Association Vasa Township Victor Township Waconia Township Watertown Township White Bear Township White Township York Township

Utilities

Aitkin Public Utilities Commission Alexandria Bd. Of Public Works Alexandria Lake Area Sanitary District Alexandria Light and Water Austin Utilities **Babbitt Public Utilities** Blue Earth Light & Water Board of Water Commissioners- Stillwater Bovey-Coleraine Water & Waste Water Commission Chisago Lakes Joint Sewage Treatment Commission Delano Municipal Utilities Dover-Eyota-St. Charles Area Sanitary District Elk River Municipal Utilities Farwell Kensington Sanitary District Glencoe Power & Light Commission Grand Rapids Public Utilities Hibbing Public Utilities Hutchinson Utility Commission Kenyon Municipal Utilities Kittson-Marshall Rural Water Users Lakefield Public Utilities Madelia Municipal Power/Light

Marshall & Polk Rural Water System Marshall Water, Light and Power Commission Moorhead Public Service Moose Lake Water and Light Commission North Branch Water & Light North Kittson Rural Water System Otter Tail Water Management District Owatonna Public Utilities Pope/Douglas Solid Waste Management Princeton Public Utilities Proctor Public Utilities Commission Public Utilities Commission - New Ulm Sauk Centre Water, Light & Power Commission Shakopee Public Utilities Sleepy Eye Public Utility Southern Minn. Municipal Power Agency Spring Valley Public Utilities Commission Springfield Public Utilities Commission Truman Municipal Light Plant Wells Public Utilities Department Western Lake Superior Sanitary Dist. Westbrook Power & Water Department