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POLITICAL SUBDIVISIONS - MINNESOTA

Johnson v. Princeton Public Utilities Commission

Court of Appeals of Minnesota - July 10, 2017 - N.W.2d - 2017 WL 2919109

Employee of sewer-and-water contractor brought negligence action against public utilities commission, seeking to recover for work-related injuries employee sustained when a utility pole fell on his compacting machine.

Following jury trial, the District Court entered judgment in favor of employee, but reduced the jury's award by the amount that employee received in settlement of his workers' compensation claim against sewer-and-water contractor, and further reduced the award by 30 percent, to account for the jury's apportionment of comparative fault, and denied both parties' motions for judgment as a matter of law. On appeal, the Court of Appeals affirmed the District Court's orders denying judgment as a matter of law, but reversed the collateral-source reduction and the reduction based on comparative fault. On remand, the District Court concluded that it lacked the authority to grant public utilities commission's motion seeking a reduction of the judgment under the workers' compensation and collateral-source statutes, and entered judgment for damages, plus preverdict interest at the rate of ten percent per year, and costs. Public utilities commission appealed.

The Court of Appeals held that:

- Public utilities commission was a political subdivision of the state, for purposes of preverdict-interest statute, and
- District court did not have the authority to apply a collateral-source offset on remand of employee's negligence action against public utilities commission to recover for injuries sustained in a work-related accident.

Public utilities commission was a political subdivision of the state, for purposes of preverdict-interest statute. Legislature intended to authorize cities to provide electric service to customers in specified geographic areas and to allow cities to delegate to a public utilities commission the responsibility for performing such authorized government function.

District court did not have the authority to apply a collateral-source offset on remand of employee's negligence action against public utilities commission to recover for injuries sustained in a work-related accident, where that issue was already decided by the Court of Appeals on an earlier appeal, without any indication that the Court of Appeals contemplated any further proceedings on the issue beyond entry of judgment.