



AN ALLETE COMPANY

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October 22, 2018

VIA E-FILING

Mr. Daniel P. Wolf, Executive Secretary
MN Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: Minnesota Power's Petition for Approval of an Amendment to Electric Service Agreement Between Verso Minnesota Wisconsin LLC and Minnesota Power
Docket No. E015/M-18-603

Dear Mr. Wolf:

Minnesota Power provides these brief reply comments to the Minnesota Department of Commerce, Division of Energy Resources' October 17, 2018 comments (Docket No. E015/M-18-603) regarding Minnesota Power's Request for Approval of an Amendment to an Electric Service Agreement between Verso Minnesota Wisconsin LLC and Minnesota Power, specifically relating to any conflicts between the proposed Amendment to the Service Agreement and MP's tariffs.

Section III of Minnesota Power's September 21 petition filing describes how the principal terms of the Amendment integrate with Minnesota Power's Large Power ("LP") Service Schedule, and each of the subsections thereafter describe components in the Amendment and how the language in the Amendments complement that in the LP Service Schedule. Minnesota Power believes that the Amendment does not conflict with the applicable tariff or provide any conflicts between the Electric Service Agreement ("ESA") and tariffs, and has historically used that section of petitions to call out any differences that were not previously approved or any specific changes that would require specific Commission approval.

By way of example Minnesota Power does note that, while Item 3 of Section III does call out the fact that weekly expedited billing is not consistent with the existing Rider for Expedited Billing Procedures ("Rider"), weekly expedited billing was previously approved by the Commission in Docket No. E015/M-12-1025 and would presumably not require specific Commission approval again in the docket, given that the only change to the program being the removal of the financial performance criteria so that Verso will remain on weekly expedited billing for the term of the Agreement.

If you have any questions regarding this letter, please do not hesitate to contact me at the number above.

Yours truly,

A handwritten signature in black ink that reads 'David R. Moeller'.

David R. Moeller

DRM:sr

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

SUSAN ROMANS, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **22nd** day of **October, 2018**, she served Minnesota Power’s Reply Comments in **Docket No. E015/M-18-603** on the Minnesota Public Utilities Commission and the Office of Energy Security. The persons on E-Docket’s Official Service List for this Docket were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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