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October 19, 2021

**VIA ELECTRONIC FILING**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

Re: In the Matter of the Joint Request of Princeton Public Utilities and East  
Central Energy to Update Electric Service Territory Records  
MPUC Docket: E295,E112/SA-21-697  
PPU Reply Comments  
Our File No.: 63052-0001

Dear Mr. Seuffert:

As you know, I represent Princeton Public Utilities (“PPU”) in this matter. PPU has reviewed the comments filed by the Department of Commerce on October 5, 2021 in this matter. To avoid potential uncertainty in the record, PPU wishes to note two clarifications. After consulting with Mr. Kundert at the Department of Commerce, it was suggested that PPU provide reply comments. This letter serves as brief reply comments by PPU.

First, there seems to be a question as to whether interim service was authorized. The Department’s comments state that “the Parties appear to have agreed informally” to interim service. Comments, III(B). The joint initial filing states that “the Parties have agreed to the Municipal providing service to the Affected Area effective July 27, 2021.” Initial Filing at 2. Comments For the avoidance of doubt, the parties authorized PPU to provide interim service.

Second, the Department’s comments note that because the “filing made no mention of compensation” the “Department assumes no compensation occurred.” Comments, III(D). Unfortunately, this statement is not correct. The joint filing specifically notes that the parties agreed to compensation: “In the present case, the

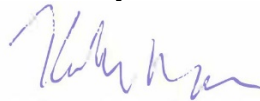
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transfer occurred pursuant to Section 216B.44: the Affected Area lies within the city limits; the Parties have agreed upon appropriate compensation; and the Parties have agreed to the Municipal providing service.” Initial Filing at 2 (emphasis added). The parties have agreed as to compensation.

Because the Commission’s practice is to attach the Department of Commerce comments to its final order, PPU respectfully requests that these revisions be made in the final order.

Please feel free to contact me (612-752-1916 or [kmb@mcgrannshea.com](mailto:kmb@mcgrannshea.com)) if you have any questions.

Sincerely,



Kathleen M. Brennan

cc: Service List