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April 28, 2015

VIA ELECTRONIC FILING

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

RE: In the Matter of a Petition for Approval of a Service Territory Agreement Between
East Central Energy and Minnesota Power
Docket No. E112, 015/SA-15-311

Dear Mr. Wolf:

Please find attached for filing Minnesota Power and East Central Energy's Reply
Comments in the above-referenced Docket.

Yours truly,

David R. Moeller

DRM:sr
Encl.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

Docket No. E112, 015/SA-15-311

In the Matter of a Petition for Approval of a
Service Territory Agreement Between East
Central Energy and Minnesota Power

REPLY COMMENTS

On April 27, 2015 the Minnesota Department of Commerce - Division of Energy Recourses (“Department”) recommended the approval of the Joint Request for Approval of a Service Territory Agreement between East Central Energy and Minnesota Power with the understanding that the Agreement is intended to result in permanent service area rights. East Central Energy and Minnesota Power confirm that the Agreement will, upon approval by the Minnesota Public Utilities Commission, result in permanent service area rights.

East Central Energy and Minnesota Power would like to thank the Department for its recommendation and appreciates the opportunity to provide these Reply Comments.

Dated: April 28, 2015

Respectfully submitted,



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**Attorney for Minnesota Power and on
behalf of East Central Energy**

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 **28th** day of **April, 2015**, she served Minnesota Power and East Central Energy's Reply Comments on the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via electronic filing. The persons on the attached service were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_15-311_SA-15-311
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-311_SA-15-311
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-311_SA-15-311
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-311_SA-15-311
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-311_SA-15-311
Vern	Johnson	vern.johnson@ecemn.com	East Central Energy	PO Box 39 Braham, MN 55006	Electronic Service	No	OFF_SL_15-311_SA-15-311
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-311_SA-15-311
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John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-311_SA-15-311
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-311_SA-15-311

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-311_SA-15-311
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-311_SA-15-311
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-311_SA-15-311