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September 19, 2013

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-2147

RE: **Reply Comments**  
In the Matter of Minnesota Power's  
Request to Amend its Rider for Standby Service  
Docket No. E015/M-13-770

Dear Dr. Haar:

Minnesota Power hereby electronically submits Reply Comments in the above-referenced Docket.

Please contact me at the number above if you have any questions regarding this filing.

Yours truly,

David R. Moeller

DRM:sr  
Attachment  
c: Official Service Lists



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

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In the Matter of Minnesota Power’s  
Request to Amend its Rider for Standby Service

Docket No. E015/M-13-770  
**MINNESOTA POWER  
REPLY COMMENTS**

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**I. INTRODUCTION AND BACKGROUND**

On August 30, 2013, Minnesota Power filed a petition with the Minnesota Public Utilities Commission (“Commission”) to request approval of a change to its Rider for Standby Service tariff to revise the minimum size of distributed generation system for which it requires customers to take standby service to 100 kW to comply with a 2013 amendment to Minn. Stat. §216B.164, subd. 3a(b).

On September 9, 2013 the Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed its comments recommending the approval of Minnesota Power’s proposed changes to its Standby Service tariff and recommending the opening of a generic proceeding to evaluate the appropriateness and application of standby charges.

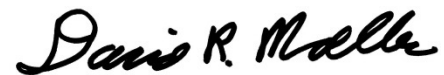
**II. MINNESOTA POWER’S REPLY COMMENTS**

Minnesota Power appreciates the Department’s recommendation to approve the proposed change to its Rider for Standby Service in order to comply with the revised Minnesota statute. Minnesota Power agrees with the Department’s recommendation that the Commission open a generic proceeding to review the methodology for determining standby rates and the appropriateness and application of utility standby charges. Such a proceeding should be

conducted in the context of other applicable Commission notices and updates related to the 2013 energy legislation.

Dated: September 19, 2013

Respectfully submitted,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

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

AFFIDAVIT OF SERVICE VIA  
E-FILING AND  
FIRST CLASS MAIL

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Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 19<sup>th</sup> day of September, 2013 she e-Filed Minnesota Power's Reply Comments in Docket No. E015/M-13-770. The persons on the attached Official Service List were served as requested.

/s/ Susan Romans  
Susan Romans

Subscribed and sworn to before  
me this 19<sup>th</sup> day of September, 2013.

/s/ Jodi Nash  
Jodi Nash, Notary Public  
Commission Expires on Jan 31, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_13-770_M-13-770
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_13-770_M-13-770
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_13-770_M-13-770
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	OFF_SL_13-770_M-13-770
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Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_13-770_M-13-770

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