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October 6, 2016

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 Amended and Restated Electric Service Agreement Between United Taconite LLC, Northshore Mining Company and Minnesota Power **Docket No. E015/M-16-534**

Dear Mr. Wolf:

Enclosed for filing with the Commission please find Minnesota Power's Reply Comments in the above-referenced Docket.

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

Yours truly,

David R. Moeller

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DRM:sr Attach.

STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Docket No. E015/M-16-534

In the Matter of a Petition for Approval of an Amended and Restated Electric Service Agreement Between United Taconite LLC, Northshore Mining Company, and Minnesota Power

REPLY COMMENTS MINNESOTA POWER

Minnesota Power has reviewed the Initial Comments filed by the Department of Commerce ("Department") on September 27, 2016 and Fresh Energy on September 21, 2016 regarding a Petition for Approval of the Electric Service Agreement ("Agreement") with United Taconite LLC, Northshore Mining Company ("Utac"). Minnesota Power agrees with the Department Comments that recommends that the Minnesota Public Utilities Commission ("Commission") approve the Petition and appreciates the Department's and Fresh Energy's timely reviews of the Petition. The Department's recommendation regarding addressing service to Utac in Minnesota Power's next Integrated Resource Plan filing and capacity resources is standard information that Minnesota Power has included and will continue to include.

One clarification from the Department's comments is that the Agreement only extends until December 31, 2026 and not December 2030. Under the Agreement, notice to cancel could be served by Utac in 2022 but would not be effective until December 31, 2026. The Agreement continues after December 31, 2026 on a rolling four-year basis until a cancellation notice is issued by either party.

Dated: October 6, 2016 Respectfully submitted,

David R. Moeller Senior Attorney Minnesota Power

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