

May 11, 2015

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101-2147

**RE: In the Matter of Minnesota Power's Request for Approval of its 2014 Renewable Resources Rider Factors**  
Docket No. E015/M-14-349

Dear Mr. Wolf:

The Department submits this letter in response to the Staff Briefing Papers filed May 5, 2015 in this Docket, and in particular, to Staff's discussion of the treatment of the North Dakota Investment Tax Credits (ND ITCs) generated by Minnesota Power's (MP) investments in the Bison wind projects.

The Department appreciates Staff's thorough and thoughtful discussion of this issue. At the time Staff Briefing Papers were filed, the Department was preparing to file response comments in Docket No. E015/M-14-962 with a more substantive discussion of the Minnesota Public Utilities Commission's (Commission) stand-alone tax policy, and the appropriate application of this policy to MP's ND ITCs.<sup>1</sup> The Staff Briefing Papers raised additional questions that the Department would like to have an opportunity to discuss before it files its response comments and before this issue is heard at a Commission Agenda Meeting. Thus the Department requests the opportunity to meet with Commission Staff and MP to discuss this issue further.

As noted on page eight of the Staff Briefing Papers, the Department proposed to address this issue in Docket No. E015/M-14-962, and MP agreed. If the Commission is willing to delay consideration of this particular issue until that Docket is heard, the instant Docket can proceed as currently scheduled. If the Commission would prefer to consider this issue in the instant Docket, a short delay may be necessary in order for the parties to schedule a

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<sup>1</sup> Docket No. E015/M-14-962 is MP's 2015 Renewable Resources Rider Docket.

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meeting. Alternatively, if the Commission would prefer to consider this issue in the instant Docket as currently scheduled, the Department will be prepared to discuss it at the Agenda Meeting on May 14, 2015, regardless of whether the parties are able to meet beforehand.

Sincerely,

/s/ CRAIG ADDONIZIO  
Financial Analyst

CA/ja

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. E015/M-14-349**

**Dated this 11<sup>th</sup> day of May 2015**

**/s/Sharon Ferguson**

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