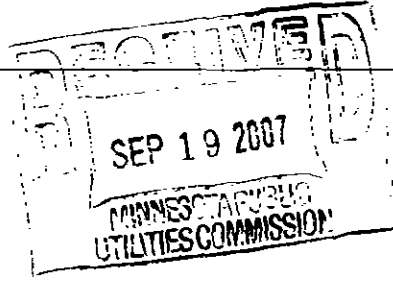




Power System
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12301 Central Avenue, N.E., Suite 250
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September 18, 2007

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

***Subject: Dakota Electric Association Comments in the Matter of the Commission's
Investigation into the Appropriateness of Continuing to Permit Electric
Energy Cost Adjustments
Docket No. E-999/CI-03-802***

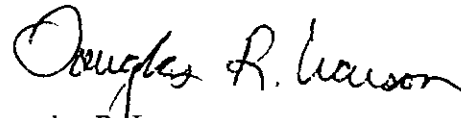
Dear Dr. Haar:

On June 4, 2003, the Minnesota Public Utilities Commission (MPUC or Commission) opened an investigation into whether the fuel clause adjustment (FCA) continues to be a useful regulatory tool. On February 19, 2004, Dakota Electric Association (Dakota Electric) submitted comments in this matter, with additional comments provided on April 27, 2007. On August 16, 2007, the Commission solicited additional comments in this matter.

Dakota Electric submits this filing to confirm that we continue to stand by previous comments as submitted on February 19, 2004 and April 27, 2007. Specifically, through these prior comments, Dakota Electric has shown that wholesale power costs represent an important cost of providing service to our members, and the original reasons for implementing automatic energy adjustments are just as valid today as they were when the electric energy adjustment rules were originally established. Based on the details provided in these earlier comments, Dakota Electric continues to request a Commission finding that our continued application of the Resource and Tax Adjustment is appropriate and in the best interest of our member-owners. We further request that Dakota Electric be removed from any further investigation that the Commission may decide to undertake in this docket.

If the Commission staff has any questions regarding Dakota Electric's prior comments and reaffirmation of those comments through this letter, they may contact me at (763) 755-5122.

Sincerely,

A handwritten signature in black ink that reads "Douglas R. Larson". The signature is written in a cursive style with a large, looped initial "D".

Douglas R. Larson
Vice President
Power System Engineering, Inc.
on behalf of
Dakota Electric Association
4300-220th Street West
Farmington, MN 55024

MN0650701/mmc

Enclosure

STATE OF MINNESOTA

SS

COUNTY OF ANOKA

AFFIDAVIT OF SERVICE

I, Jennifer Maciej, being first duly sworn, deposes and says:

That on the 18th day of September 2007 I served the attached Comments on behalf of Dakota Electric Association:

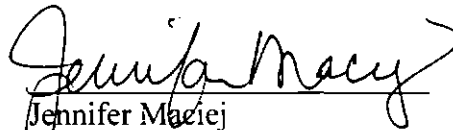
X by depositing in the United States Mail at the City of Blaine, a true and correct copy thereof, properly enveloped with postage prepaid

by personal service

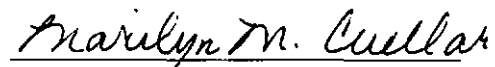
by delivery service

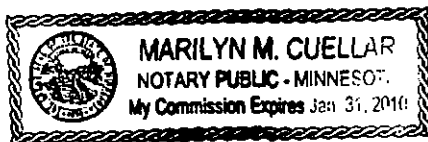
by express mail

to all persons indicated on the attached service list:


Jennifer Maciej

Subscribed and sworn to before me
this 18th of September 2007.


Marilyn M. Cuellar



E999/CI-03-802

In the Matter of an Investigation into
the Appropriateness of Continuing to
Permit Electric Energy Cost Adjustments

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E999/CI-03-802

In the Matter of an Investigation into
the Appropriateness of Continuing to
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