

McGRANN SHEA CARNIVAL STRAUGHN & LAMB, CHARTERED

ATTORNEYS AT LAW

WILLIAM R. MCGRANN
DOUGLAS M. CARNIVAL
ROBERT O. STRAUGHN
PETER L. COOPER
KATHLEEN M. LAMB
JOHN R. SCHULZ
COREY J. AYLING
BRIAN L. SOBOL
SCOTT B. CROSSMAN

CARLA J. PEDERSEN
JOSEPH T. BAGNOLI
ROGER J. STELLJES
JEFFREY C. URBAN
KATHLEEN MICHAELA BRENNAN
JENNIFER A. JAMESON
CARL S. WOSMEK
JASON H. THOMAS
AMY L. COURT

MICHAEL T. HATTING
CHRISTY E. LAWRIE

OF COUNSEL
ANDREW J. SHEA

~~~~~  
December 22, 2014

Dr. Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

VIA E-FILING

Re: In the Matter of the Joint Request of the Delano Water, Light, and Power Commission and Wright-Hennepin Cooperative Electric Association to Modify Electric Service Territory Boundaries  
MPUC Docket No.: E148, E228/SA-14-824  
Our File No.: 61588-0002

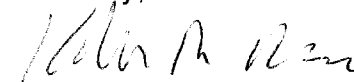
Dear Dr. Haar:

This letter constitutes the Reply Comments of the Delano Water, Light, and Power Commission ("Delano") in this matter. Delano has reviewed and appreciates the Department of Commerce ("Department") comments and recommendation of approval in this matter.

As noted by the Department, the parties' records differ in the number of similarly affected customers by two (Delano identified 13 and Wright-Hennepin identified 15). Delano has not received any updated information from Wright-Hennepin in this regard. Nonetheless, Delano notes that this difference should not affect the Commission's decision-making. Delano's recent policy will apply to all eligible customers under the criteria, regardless of the anticipated number of customers. Therefore, as properly concluded by the Department, the Commission should consider the merits of the joint petition and the Department's recommendation of approval.

By copy of the same, these Reply Comments are being served on all parties identified in the service list. If you have any questions, please contact me.

Sincerely,



Kathleen M. Brennan

cc: Service List