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June 17, 2019

VIA E-FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of Minnesota Power's Petition for Approval of its Electric Vehicle
Commercial Charging Rate Pilot
Docket Number: E015/M-19-337**

Dear Mr. Wolf:

The Large Power Intervenors ("LPI") submit this letter comment to request additional information from Minnesota Power regarding its Petition for Approval of an Electric Vehicle Commercial Charging Rate Pilot. It appears that Minnesota Power's request is limited to seeking approval from the Minnesota Public Utilities Commission for tariff changes on rate design. LPI respectfully requests that Minnesota Power confirm that the proposed pilot program and associated tariff is limited to rate design only and does not include any related capital investment, either to Minnesota Power's distribution system or the EV customers' premises. LPI submits this request because a portion of the petition appears to indicate that there are incremental costs associated with the pilot program. *See* Minnesota Power Petition at p. 20. LPI greatly appreciates any clarification Minnesota Power can provide in reply comments. Also attached is a Certificate of Service.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Enclosures

cc: Service List

102401867.2 0064591-00006

CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

LETTER COMMENT ON BEHALF OF LARGE POWER INTERVENORS

**Re: In the Matter of Minnesota Power's Petition for Approval of its Electric Vehicle
Commercial Charging Rate Pilot
Docket Number(s): E015/M-19-337**

Dated this 17th day of June, 2019

/s/ Carmel Laney
Carmel Laney

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