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**PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED**

June 18, 2015

VIA ELECTRONIC FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of 2014 Electric Company's and
Department of Commerce Annual Automatic Adjustment Reports
Docket No. E999/AA-14-579

Dear Mr. Wolf:

Minnesota Power hereby electronically submits its Reply Comments in the above-referenced Docket. An Affidavit of Service is included.

Please contact me at the number above should you have any questions related to this filing.

Yours truly,

Christopher D. Anderson

CDA:dml

c: Service List



STATE OF MINNESOTA
BEFORE THE
MINNSOTA PUBLIC UTILITIES COMMISSION

In the Matter of 2014 Electric Company's
Annual Automatic Adjustment Reports

Docket No. E999/AA-14-579
REPLY COMMENTS

Minnesota Power provides these Reply Comments in response to the Department of Commerce – Division of Energy Resources (“Department”) Review of the 2013-2014 Annual Adjustment Reports (“FYE14 AAA” dated May 19, 2015, in the above-referenced Docket.

This Reply follows the format of the Department’s FYE14 AAA by summarizing the issue and providing the Minnesota Power response.

VII. EFFECTS OF MISO DAY 2 ON MINNESOTA RATEPAYERS

C. OVERALL REVIEW OF MISO DAY 2 CHARGES

2. Review of MP's MISO Day 2 Charges

The Department reviewed Minnesota Power’s MISO Day 2 charges as reported in Attachment 9 to its FYE14 AAA Report and, with the exceptions described below, concludes that they are reasonable.

MP’s Day-Ahead Asset Energy Charges in September 2013 and May 2014 were \$8.7million and \$8.9 million, respectively; higher than in any other month since at least July 2010. The Department requests that MP explain in reply comments the reasons for the high charges observed in those months.

Response:

As identified in Minnesota Power's 2013 and 2014 annual fuel clause forecasts, and as subsequently reported with the Monthly DOC AA filings, there were several significant scheduled outages during September 2013. Boswell Unit 3 had a 5 day outage for boiler maintenance. Boswell Unit 4 had a 7 day outage for boiler maintenance. Square Butte Young #2 had a 24 day outage for turbine maintenance. **TRADE SECRET DATA HAS BEEN EXCISED.**

**PUBLIC DOCUMENT
TRADE SECRET DATA EXCISED**

As identified in Minnesota Power's 2013 annual fuel clause forecast, and as subsequently reported with the Monthly DOC AA filings, there was a significant scheduled outage and a forced outage during May 2014. Boswell Unit 3 had a 13 day scheduled outage for a major boiler overhaul. Boswell Unit 4 had a 5 day forced outage for a boiler tube leak. **TRADE SECRET DATA HAS BEEN EXCISED.**

Minnesota Power appreciates the opportunity to file these Reply Comments and looks forward to addressing these issues through the Commission-led processes.

Dated: June 18, 2015

Respectfully submitted,



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STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Dawn LaPointe of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 18th day of June, 2015, she served Minnesota Power's Reply Comments in Docket No. E999/AA-14-579 to the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via electronic filing.


Dawn LaPointe

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