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November 14, 2014

VIA E-FILING

Dr. Burl Haar, Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: RESPONSE COMMENTS

In the Matter of Minnesota Power's Petition for Approval of
Light Emitting Diode Rates for Street and Highway Lighting Service
Docket No. E015/M-14-675

Dear Dr. Haar:

Minnesota Power (the "Company") thanks the Department of Commerce ("Department") for its thoughtful analysis of the Company's Reply Comments in its Petition for Approval of Light Emitting Diode (LED) Rates for Street and Highway Lighting Service.

Minnesota Power agrees with the Department's recommendation in its November 7, 2014 Response Comments to approve the Company's Petition with modification to the proposed tariff language to charge sodium vapor fixture undepreciated costs to Option 1 customers who wish to replace sodium vapor lights that are less than ten years old with LED fixtures by reducing the undepreciated costs by the salvage value of the facilities.

If you have any questions regarding this filing, please do not hesitate to contact me at the number above.

Yours truly,

Marcia A. Podratz

MAP:sr
c: Service List

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

AFFIDAVIT OF SERVICE VIA
E-FILING AND
FIRST CLASS MAIL

Susan Romans, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 14th day of November, 2014, she e-filed Minnesota Power's Response Comments in Docket No. E015/M-14-675 on the Minnesota Public Utilities Commission and the Department of Commerce via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.

Susan Romans

Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-675_M-14-675
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_14-675_M-14-675
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Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	OFF_SL_14-675_M-14-675
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_14-675_M-14-675
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_14-675_M-14-675
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Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-675_M-14-675
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John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_14-675_M-14-675

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