

June 15, 2016

**VIA EFILING**

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

RE: Reply Comments to Comments of the Minnesota Department of Commerce regarding Minnesota Power's 2015 Conservation Improvement Program ("CIP") Consolidated Filing, Docket No. E015/M-16-226

Dear Mr. Wolf:

Minnesota Power has reviewed the May 23, 2016, Comments made by the Minnesota Department of Commerce, Division of Energy Resources (Department) regarding its 2015 CIP Consolidated Filing. Minnesota Power (Company) provides these Reply Comments in response to the analysis, recommendations, and requests of the Department.

***Department Recommendations***

The Department recommends the following:

- approve Minnesota Power's 2015 CIP Tracker Account Activity;
- approve a 2016/2017 CPA of \$0.002494;
- approve an incentive of \$7,476,643 for Minnesota Power's 2015 CIP achievements;
- grant Minnesota Power a variance to Minn. Rules part 7820.3500 and 7825.2600 to permit Minnesota Power to continue combining the Conservation Program Adjustment (CPA) with the Fuel Clause Adjustment on customer bills; and
- require Minnesota Power to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

***Reply Comments***

Department Recommendations:

Minnesota Power agrees with the Department's analysis and recommendations for approval of the CIP Tracker balance, CPA factor, financial incentive, and variance to Minn. Rules part 7820.3500 and 7825.2600. The Company appreciates the Department's efforts to facilitate timely approval of the financial components of the filing relative to 2015 achievements and performance. As acknowledged by the Department, 2015 energy savings are the highest the Company has achieved since the energy-savings goal went into effect in 2010.

As of the date of these reply comments, a Department decision for the 2015 CIP Status Report was still pending. The Department did issue a Proposed Decision on May 31, 2016, recommending acceptance of Minnesota Power's Status Report.<sup>1</sup> As the Status Report serves as the basis for incentive calculations, Minnesota Power understands that any adjustments, if applicable, to savings achievements or budget amounts for 2015 would need to be addressed as part of Minnesota Power's April 1, 2017, filing reporting on 2016 activity.

As noted in its filing, Minnesota Power will include a message referencing the change in the CPA in customers' bills in the month in which the new factor goes into effect. The message will read as follows, with the effective date dependent on the timing of Commission approval for the CPA and the issuance of the Order:

*Effective <DATE>, the Resource Adjustment line item on your bill has <increased/decreased> due to a change in the Conservation Improvement Program (CIP) billing factor. The CIP portion of the Resource Adjustment is \$X.XXXX per kilowatt-hour (kWh).*

In advance of implementation, Minnesota Power will work with the Commission's Consumer Affairs Office staff to confirm this proposed customer notice. The timing of Commission approval may necessitate a slight shift of one month for the effective date of the CPA to allow for customer billing system changes to the factor and coordination of bill messaging with the Commission's Consumer Affairs Office.

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<sup>1</sup> Proposed Decision In the Matter of Minnesota Power's 2015 Conservation Improvement Program Status Report, Docket No. E015/CIP-13-409.02, May 31, 2016.

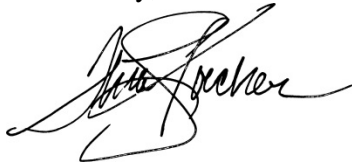
***In Conclusion***

Minnesota Power appreciates the Department's analysis and recommendations, including their efforts to facilitate review and approval of the financial components of this filing. In summary, the Department's recommendations are:

1. approve Minnesota Power's 2015 CIP Tracker Account Activity;
2. approve a 2016/2017 CPA of \$0.002494;
3. approve an incentive of \$7,476,643 for Minnesota Power's 2015 CIP achievements;
4. approve a variance of Minnesota Rules pts. 7820.3500 and 7825.2600 to permit the Company to combine the CPA with the FCA on customer bills; and
5. require Minnesota Power to submit a compliance filing within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Minnesota Power agrees with these recommendations and is available to answer any questions.

Yours Truly,



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

**AFFIDAVIT OF SERVICE VIA  
E-FILING AND U.S. MAIL**

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Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **15<sup>th</sup>** day of **June, 2016**, she served Minnesota Power's Reply Comments in Docket No. E015/M-16-226 on the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via e-Filing. The persons on the attached Minnesota Power's CIP Service List and CIP Special Service List were served the as requested.



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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_16-226_M-16-226
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_16-226_M-16-226
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_16-226_M-16-226
Mathias	Bell	mathias.bell@opower.com	Opower	1515 N Courthouse Rd  Arlington, VA 22201	Electronic Service	No	OFF_SL_16-226_M-16-226
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_16-226_M-16-226
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_16-226_M-16-226
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_16-226_M-16-226
Gary	Connett	gconnett@grenergy.com	Great River Energy	12300 Elm Creek Blvd N  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_16-226_M-16-226
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_16-226_M-16-226
Jill	Curran	jcurran@mchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-226_M-16-226

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Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
Jill	Curran	jcurran@mchamber.com	Minnesota Waste Wise	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST

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Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE Rochester, MN 55906	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Norm	Harold	N/A	NKS Consulting	5591 E 180th St Prior Lake, MN 55372	Paper Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
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Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency	702 3rd Ave S  Virginia, MN 55792	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy Company, Inc.	4628 Mike Colalillo Dr  Duluth, MN 55807	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Deborah	Knoll	dknoll@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Tina	Koecher	tkoecher@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST
Kelly	Lady	kellyl@austinutilities.com	Austin Utilities	400 4th St NE  Austin, MN 55912	Electronic Service	No	SPL_SL_CIP SPECIAL SERVICE LIST

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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	No	SPL_SL__CIP SPECIAL SERVICE LIST
Nick	Mark	nick.mark@centerpointenergy.com	CenterPoint Energy	800 LaSalle Ave  Minneapolis, MN 55402	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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