

August 21, 2017

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-16-204

Dear Mr. Wolf:

On July 21, 2017, Minnesota Power (the Company) submitted a Compliance Filing for its Cogeneration and Small Power Production tariffs in the above-referenced docket. The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Minnesota Power's Compliance Filing and notes the following two items yet to be resolved:

1. The Compliance Filing contains monthly service charges for each rate. Minnesota Power has proposed to eliminate the monthly service charge and submit a second compliance filing without those charges.
2. The Simultaneous Purchase and Sale Billing Rates and the Kilowatt-Hour Energy Credit Rates each include an Energy and Firm Power Capacity Credit of 2.96¢/kWh delivered to Company. The Department notes that to be consistent with Schedules A and B of the Company's most recent annual Cogeneration and Small Power Production Tariff filing in Docket No. E999/PR-17-09, this credit should be 2.99¢/kWh delivered to Company for each applicable rate.

The Department concludes that the Company has incorporated the remainder of the Minnesota Public Utilities Commission's Order¹ into its tariff.

¹ *In the Matter of Minnesota Power's Petition for Approval of Revisions to Rider for Parallel Generation*, May 22, 2017.

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The Department supports Minnesota Power's proposal to submit a revised compliance filing eliminating the monthly service charges, and recommends adjusting the above-referenced Energy and Firm Power Capacity Credits.

The Department is available to answer any questions.

Sincerely,

/s/ SUE PEIRCE
Rates Analyst

/s/ DANIELLE WINNER
Rates Analyst

SP/DW/ja

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Letter**

Docket No. E015/M-16-204

Dated this 21st day of August 2017

/s/Sharon Ferguson

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Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Craig	Rustad	crustad@minnkota.com	Minnkota Power	1822 Mill Road PO Box 13200 Grand Forks, ND 582083200	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Thomas	Scharff	thomas.scharff@versoco.c om	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_16-204_Official List 16-204

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Christopher	Schoenherr	cp.schoenherr@smmpa.org	SMMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Dean	Sedgwick	N/A	Itasca Power Company	PO Box 457 Bigfork, MN 56628-0457	Paper Service	No	OFF_SL_16-204_Official List 16-204
Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology	120 Tredegar Street Richmond, Virginia 23219	Electronic Service	No	OFF_SL_16-204_Official List 16-204
William	Seuffert	Will.Seuffert@state.mn.us		75 Rev Martin Luther King Jr Blvd 130 State Capitol St. Paul, MN 55155	Electronic Service	No	OFF_SL_16-204_Official List 16-204
David	Shaffer	DShaffer@MnSEIA.org	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Patricia	Sharkey	psharkey@environmentalawcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Patricia F.	Sharkey	N/A	Midwest Cogeneration Association	P.O. Box 87374 Carol Stream, IL 60188	Paper Service	No	OFF_SL_16-204_Official List 16-204
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	1350 Landmark Towers 345 St. Peter St St. Paul, MN 55102	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Beth H.	Soholt	bsoholt@windonthewires.org	Wind on the Wires	570 Asbury Street Suite 201 St. Paul, MN 55104	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Tom	Stanton	tstanton@nrri.org	NRRI	1080 Carmack Road Columbus, OH 43210	Electronic Service	No	OFF_SL_16-204_Official List 16-204
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Steve	Thompson	stevet@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_16-204_Official List 16-204
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Jason	Willett	jason.willett@metc.state.mn.us	Metropolitan Council	390 Robert St N Saint Paul, MN 55101-1805	Electronic Service	No	OFF_SL_16-204_Official List 16-204
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_16-204_Official List 16-204
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_16-204_Official List 16-204
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Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkwyt Court Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_16-204_Official List 16-204