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September 6, 2013

VIA ELECTRONIC FILING

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

Re: In the Matter of Possible Amendments to Rules Governing
Utility Proceedings, Practice, and Procedure, Minnesota Rules
Chapter 7829, Excluding Part 7829.2550, Which is Subject
to a Separate Pending Rulemaking
Docket No. U999/R-13-24

Dear Dr. Haar:

Minnesota Power hereby electronically submits Comments in response to the Commission's Notice of Comment Period dated August 7, 2013 in the above-referenced docket. An Affidavit of Service is included.

Yours truly,

David R. Moeller

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Attachment
c: Service list

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Possible Amendments to Rules
Governing Utility Proceeding, Practice, and
Procedure, Minnesota Rules Chapter 7829,
Excluding Part 7829.2550, Which is Subject to a
Separate Pending Rulemaking

Docket No. U999/R-13-24

MINNESOTA POWER COMMENTS

On August 7, 2012, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period on Possible Amendments to Rule Chapter 7829, Excluding Part 7829.2550 (“Notice”). The Notice included a variety of topics open for comment. Minnesota Power provides these brief comments on a few of the topics. Overall, Minnesota Power supports the Commission’s efforts to streamline and update its procedural rules. As discussed during the August 1, 2013 hearing on this Docket, there are many areas of agreement on these rule updates that reflect a general consensus.

One of the more important topics discussed during the August 1, 2013 hearing and stated in the Notice is whether the Commission should include rule language that discusses sanctions for violations of the proposed Commission rule governing representations of fact or law to the Commission. Minnesota Power believes that such additional language as set forth in the Notice is unnecessary and goes beyond the scope of this Docket. The Commission already has statutory authority to impose sanctions and to enact a standard through rulemaking that goes beyond that statutory authority may create unwarranted consequences. In addition, the proposed language or other rule

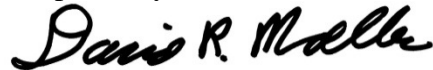
language on sanctions could create situations where representations before the Commission have different standards for attorneys and non-attorneys as well as between represented and non-represented parties.

After further review of the proposed rules, Minnesota Power believes no changes are necessary to Minn. Rules 7829.2600 related to Commission Staff Comments since the current process provides parties procedural protections. Likewise, the proposed change to Minn. Rules 7829.2400, subp. 5 is not necessary given the statutory authority already provided the Commission and the standard for how a rate case filing “will impair the commission’s ability” is vague. Furthermore, the proposed change to Minn. Rules 7829.0700 related to the Official Service List warrants further modification to reflect electronic service and that at least for utilities it would be better to allow multiple persons to be on the official service list to ensure service is fully effected.

Minnesota Power appreciates the opportunity to provide these comments.

Dated: September 6, 2013

Respectfully submitted,



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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Kristie Lindstrom of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 6th day of September, 2013, she served Minnesota Power's Comments in Response to Commission Notice in Docket No. U999/R-13-24 to the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The remaining parties on the attached service list were served as so indicated on the list.

/s/ Kristie Lindstrom

Subscribed and sworn to before
me this 6th day of September, 2013.

/s/ Sheryl A Miskowski

Notary Public - Minnesota
My Commission Expires January 31, 2015

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_13-24_Official
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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_13-24_Official
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