



AN ALLETE COMPANY

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June 2, 2017

VIA E-FILING

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

Re: Commission Inquiry into the Creation of a Commission Subcommittee
under Minn. Stat. §216A.03, Subd. 8
Docket No. E-999/CI-17-284

Dear Mr. Wolf:

Minnesota Power hereby submits, via electronic filing, its Comments in response to the Minnesota Public Utilities Commission's Notice for Comments in Docket No. E-999/CI-17-284.

The Company looks forward to the opportunity to work with the Commission and other stakeholders on this important matter. Please contact me at the number above with any questions.

Please call me at 218-723-3963 if you have any questions.

Yours truly,

David R. Moeller

DRM:sr
Attach.

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

Commission Inquiry into the Creation of a
Commission Subcommittee under
Minn. Stat. §216A.03, Subd. 8

Docket No. E-999/CI-17-284

REPLY COMMENTS

I. INTRODUCTION

On April 17, 2017, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period (“Notice”) with three topics available for comment in the above-referenced docket. The following parties filed initial comments: the Department of Commerce - Division of Energy Resources (“Department”), Institute for Local Self-Reliance, Xcel Energy, Missouri River Energy Services, Minnesota Rural Electric Association, Minnesota Municipal Utilities Association, Dakota Electric Association, Minnesota Solar Energy Industries Association, Minnesota Solar Energy Industries Project, Fresh Energy, and Scott Randall.

In these Reply Comments, the Company provides response to the comments submitted in this docket by the above-referenced organizations.

II. COMMENTS

Minnesota Power appreciates the Commission’s proposal to utilize a distributed generation (“DG”) subcommittee to address delays and allow the Commission to function more efficiently in regards to DG and solar-related issues. The Company acknowledges that there may be an opportunity to further streamline the decision making process for issues that do not involve policy considerations or significant interpretation of statute, rule, order or tariff. However, the Company agrees with other parties in this docket that further clarification is needed prior to establishment of a subcommittee.

According to the Staff Proposal, included as Attachment A of the Notice, the Commission would appoint members to the subcommittee, including at least one Commissioner, and delegate some administrative and quasi-judicial functions to the subcommittee. Minnesota Power agrees with the Department’s recommendation that Commission Staff should make further clarifications prior to establishing a DG subcommittee including the subcommittee composition, the Department and Commission’s role and a clear process to determine which topics will be addressed by the subcommittee.

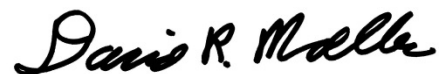
Additionally, Minnesota Power supports Xcel's recommendation to include a planned evaluation and review period to examine lessons learned from the first 12 months of the DG subcommittee's operation. This review should include whether the subcommittee created meaningful efficiencies and reduced workload, monitor which types of disputes are handled by the subcommittee, and which decisions are appealed. This will provide an opportunity to track any improvements or adjustments to further enhance the subcommittee process.

III. CONCLUSION

Minnesota Power appreciates the thoughtful comments by the Department and other stakeholders in this docket. In general, the Company believes there could be opportunity for a subcommittee to add much needed efficiencies to the process but also that additional information is needed in order to establish a subcommittee that will meet the needs of all parties involved. Specifically, further defining the subcommittee composition and authority, as well as the topics to be addressed by the subcommittee, are essential steps that should be clarified.

Dated: June 2, 2017

Respectfully submitted,



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AFFIDAVIT OF SERVICE VIA
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SUSAN ROMANS of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **2nd** day of **June, 2017**, she served Minnesota Power's Reply Comments in **Docket No. E-999/CI-17-284** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. Parties requested paper copies were served as requested.



Susan Romans

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