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December 22, 2016

VIA ELECTRONIC FILING

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

Re: Petition for Approval of Firm Transportation Agreement
Docket No. PL6580/M-16-936

Dear Mr. Wolf:

Greater Minnesota Transmission, LLC (“GMT”) filed its Petition for Approval of a Firm Gas Transportation Agreement on November 17, 2016. The Minnesota Department of Commerce, Division of Energy Resources (“the Department”) filed its Comments on December 19, 2016. This letter serves as GMT’s Reply, submitted in lieu of filing Reply Comments.

GMT appreciates the Department’s carefully considered analysis and its recommendation that the Commission approve the Agreement. GMT agrees to include the LRES project in its annual load utilization factor report, as recommended by the Department.

As the Department noted, Lake Region Energy Services (“LRES”) is a subsidiary of Lake Region Electric Cooperative (“LREC”). GMT’s references to their community presence and history were primarily related to LREC and, by extension, apply to LRES. The Department requested that LRES indicate in reply comments whether it intends to request an exemption under Minn. Stat. §216B.02, Subd. 4. GMT respectfully notes that, since LRES is not a party to the docket, it would not be submitting reply comments. GMT communicated with LRES and has been advised that LRES intends to file for exemption. GMT also respectfully submits that, given the Commission’s prior discussions, the Commission would not be inclined to consider the issue of whether LRES intends to seek (or would be granted) exemption in this docket;¹ and, that Commission consideration can proceed without regard to the status of any prospective filing by LRES.

¹ . A question related to the customer’s prospective exemption application was raised by Commission staff in preparation for the Commission’s consideration of a similar transportation agreement in Docket No. PL6580/M-15-1041. While GMT, the Department, and Commission Staff then provided information about the exemption-related question in that docket, the Commission ultimately indicated during its agenda meeting discussion that questions related to the customer’s prospective exemption application were not relevant to the transportation agreement docket at issue.



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GMT submits that no additional issues require discussion prior to the Commission's consideration. Furthermore, GMT respectfully requests that the matter be placed on the earliest available Commission agenda.

Thank you for your consideration. Please do not hesitate to contact me should there be any questions or concerns.

Sincerely,

GREATER MINNESOTA TRANSMISSION, LLC

/s/

Kristine A. Anderson
Corporate Attorney

cc: Service List