



**305 11th Street East
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March 22, 2018

Ms. Lori Spence
Deputy General Counsel
Midwest ISO
P.O. Box 4202
Carmel, IN 46082-4202

RE: Submittal of Attachments O and GG and Supporting Work Papers to the Midwest ISO

Dear Ms. Spence:

The accompanying Attachment O and Attachment GG (if applicable), along with any other supporting work papers requested by the Midwest ISO submitted for the Glencoe Light and Power Commission ("GLP") are based on the audited financial statements and underlying financial records for the electric utility for the year ended December 31, 2018. The expenses, assets, liabilities and proprietary capital data provided by GLP in the EIA Form 412, Attachment O, Attachment GG and supporting work papers are consistent with the Uniform System of Accounts cited in the EIA 412 template (which GLP will continue to use so long as the Midwest ISO requires the EIA Form 412 Template).

Allocations of expenses made in the GLP's financial statements are based on historical cost allocation reviews conducted by the electric utility staff. These cost allocations have been audited by certified professional accountants and are an accurate representation of the financial condition of the electric utility. GLP will notify the Midwest ISO in writing, explaining the new allocation methodology, before changing the methodology used to allocate these expenses in future financial statements and in its Attachment O, Attachment GG and supporting work paper submittals to the Midwest ISO. David Meyer confirms that GLP's audited financial statements and work papers submitted with the Attachment O and Attachment GG data will be publicly available for review and inspection.

GLP is not a jurisdictional utility under the Federal Power Act and federal Energy Regulatory Commission regulations. Therefore, it does not file a Form 1 nor keep its books and records in accordance with the Uniform System of Accounts. However, the Central Minnesota Municipal Power Agency of which GLP is a member has completed an EIA Form 412 consistent with historical allocation and record keeping. GLP confirms that these allocations and categorizations of rate base balances and expense detail are reasonable and consistent with the intent of the Midwest ISO's Attachment O, EIA Form 412 templates and the Uniform System of Accounts.

Sincerely,

David C. Meyer
General Manager
Glencoe Light and Power Commission
Glencoe, Minnesota