



AN ALLETE COMPANY

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November 24, 2015

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

RE: Minnesota Power's Response on the November 19, 2015 Notice of Comment Period on  
Energy-Intensive Trade-Exposed ("EITE") Rate Schedule  
Docket No. E015/M-15-984

Dear Mr. Wolf:

Minnesota Power has reviewed the Notice of Comment Period on EITE Rate Schedule ("Notice") issued by the Minnesota Public Utilities Commission ("Commission") on November 19, 2015 and believes that the Notice does not comply with Minn. Stat. § 216B.1696 ("EITE Statute").

Minnesota Power filed its Petition on November 13, 2015 under the EITE Statute, and included in the miscellaneous rate filing both a rate schedule and a cost recovery rider. The Notice specifically excludes stakeholder commentary on the current cost recovery aspect of the Petition until a later, unspecified date. Not only does this violate the 90 day determination requirement imposed by the Legislature, it needlessly exposes any Commission decision to a range of questions, from why the 90 day requirement is being violated to whether the merits of the Petition have been prejudged. The Petition should be addressed by the Commission in its entirety, but if the Commission believes it has authority to modify the time period established by the Legislature, then an amended notice should communicate the Commission's overall procedural plan upfront.

The EITE Statute requires that the "Commission shall make a final determination in a proceeding begun under **this section** within 90 days of a miscellaneous rate filing by the electric utility."<sup>1</sup> (emphasis added). The phrase "this section" refers to the entire EITE Statute and not just the EITE rate schedule paragraph under Minn. Stat. § 216B.1696, subd. 2(b). Minnesota Power's

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<sup>1</sup> Minnesota Revisor's Manual (2013 Edition), Chapter 2.10(b)(2) (providing the example, "If section 256B.059 is being amended, refer to it as 'this section.'" ) and Chapter 10.9(a) (References to Minnesota Statutes: "To a section, when the reference is within the same section: this section") available at: <https://www.revisor.mn.gov/office/2013-Revisor-Manual.pdf>.

miscellaneous rate filing was the entire Petition, including the proposed EITE cost recovery rider. See Minn. R. 7829.0100, subp. 11. For the Notice to prescribe otherwise may establish the Commission's statutory interpretation of the EITE Statute without a written Commission order as required under Minn. Stat. § 216B.33.<sup>2</sup> As Minnesota Power recognized in its Petition, additional Commission time to review and issue a written order may be necessary but the EITE Statute is clear that the 90 days statutory deadline applied to a miscellaneous rate filing under this section. Recognizing the timing impact on Commission resources, the Legislature took the extraordinary step of authorizing the Commissioner of Commerce to assess reasonable costs for services it provides of up to \$854,000 per biennium to "implement this section to the utility proposing an EITE rate schedule to the Commission." Minn. Stat. § 216B.1696, subd. 4.

Minnesota Power is also concerned that the Notice will hinder the Commission's public interest review under the unique standard set forth in Minn. Stat. § 216B.1696, subd. 2(b) of determining whether there is a "net benefit to the utility or the state" before approving an EITE rate schedule. Stakeholders must be allowed to provide input on Minnesota Power's entire Petition, including the proposed method of cost recovery, at the beginning of the procedural process in order to provide clear and meaningful input on the Petition overall. To bifurcate the issues to some later, unspecified future comment period will lead to customer confusion and could lead to collateral attack by commenting stakeholders. For example, a non-EITE customer's support or opposition to this Petition may depend in large part on the rate design for how and when the EITE rate schedule costs shall be recovered. In addressing the Petition, AARP state director Will Phillips was quoted in the Star Tribune as stating: "Raising electric rates on household impacts somebody's ability to pay their other monthly bills or limits what small amounts of discretionary income people have – and that also can have a negative impact on our economy."<sup>3</sup> Based on this statement and other discussions Minnesota Power has had with stakeholders, the merits of the proposed EITE cost recovery rider are directly tied to the merits of the EITE rate schedule and need to be part of the Commission's review of whether Minnesota Power's Petition meets the net benefit standard set forth in the EITE Statute.

Finally, the Notice undermines the Company and EITE Customers' reliance on the 90 day provision in the EITE Statute that was a consideration in executing customer commitment letter agreements that were submitted as part of the Petition. These letter agreements provide that EITE Customers will not receive any rate discounts unless and until the Commission approves both the EITE rate schedule and the EITE cost recovery rider. Because the EITE Statute specifically provides for a Commission decision within 90 days, Minnesota Power and these customers understood that, subject to Commission approvals, rate discounts would begin in the March 2016 timeframe. However, by reserving for a future comment period the merits of the proposed EITE cost recovery rider, the Notice itself will delay when benefits may flow back to EITE Customers. As the EITE Statute clearly states: "It is the energy policy of the state of Minnesota to ensure competitive rates for energy-intensive trade exposed customers." Minn. Stat. § 216B.1696, subd. 2(a). The Notice, by delaying beyond the 90 days set forth in the EITE Statute when the entire Petition will be reviewed, contravenes this legislative energy policy directive.

Minnesota Power believes the Notice should be amended to address the entirety of the Petition in compliance with the EITE Statute. Alternatively, Minnesota Power believes the Notice should more clearly explain the procedural path for inviting stakeholder comment and participation.

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<sup>2</sup> "Every order [or] finding issued or approved by the commission ... shall be in writing and filed in the office of the secretary of the commission."

<sup>3</sup> David Shaffer, *Iron Range mines may get rate relief*, Star Tribune, Early Sunday November 15, 2015, at D2.

If you have any questions regarding this matter, please do not hesitate to contact me.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller

C: Service List

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

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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Jodi Nash of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **24<sup>th</sup> day of November, 2015**, she served Minnesota Power's Notice of Comment Period in Docket No. E015/M-15-984 on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on the attached service list were served as requested.

  
\_\_\_\_\_  
Jodi Nash

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