



David R. Moeller
Senior Attorney, Director of Regulatory Compliance
218-723-3963
dmoeller@allete.com

April 23, 2020

VIA ELECTRONIC FILING

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
Saint Paul, MN 55101

The Honorable Eric L. Lipman
Administrative Law Judge
Office of Administrative Hearings
P.O. Box 64620
St. Paul, MN 55164-0620

Re: *In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates In Minnesota*
Docket No. E015/GR-19-442
OAH Docket No. 8-2500-36575

In the Matter of the Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case
Docket No. E015/M-20-429

Dear Mr. Seuffert and Judge Lipman:

As an initial matter, from all of us at Minnesota Power, we hope that the Commissioners and Staff at the Minnesota Public Utilities Commission (“Commission”), everyone at the Office of Administrative Hearings, and the parties are safe and well during this difficult time. We are in unprecedented and challenging times, with the COVID-19 outbreak having expansive health and economic effects around the country, the State, and in Minnesota Power’s service territory. The Governor of Minnesota has declared a peacetime state of emergency and has issued executive orders directing Minnesotans to stay at home.¹

While it is still too early to tell what the ultimate consequences of COVID-19 will be, now is the time for creative approaches to the challenges that face us all. To that end, Minnesota Power is today filing an Emergency Petition for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case (“Petition”) in Docket No. E015/M-20-429,

¹ Minn. Stat. § 12.31, subd. 2; Minn. Exec. No. 20-01 (Walz), *Emergency Executive Order 20-01 Declaring a Peacetime Emergency and Coordinating Minnesota’s Strategy to Protect Minnesotans from COVID-19* (Mar. 13, 2020); Minn. Exec. 20-20 (Walz), *Emergency Executive Order 20-20 Directing Minnesotans to Stay at Home* (Mar. 25, 2020); Minn. Exec. 20-33 (Walz), *Emergency Executive Order 20-23 Extending Stay at Home Order and Temporary Closure of Bars, Restaurants, and Other Places of Public Accommodation* (Apr. 8, 2020).

which, if approved by the Commission, will offer immediate rate relief to our retail customers, provide for a financially healthy utility, and allow the Company to withdraw its current rate case. This proposed solution will also ease the administrative and safety burdens associated with litigating the Company's rate case and allow Minnesota Power and other stakeholders to focus on more pressing needs in this time of crisis and in the uncertain months ahead. For Minnesota Power, this means focusing on the core tasks of providing safe and reliable electric service to our customers while protecting our employees and members of the public. For other stakeholders and the public, this allows focus on their own pressing matters, and avoids the need for public and evidentiary hearings that may prove challenging if restrictions on large gatherings persist.

Fundamentally, Minnesota Power's proposal is to fully resolve its pending rate case by moving recovery of the Company's asset-based wholesale margin credits² from base rates to the Fuel Adjustment Clause ("FAC") effective May 1, 2020, consistent with how other electric utilities account for these margin credits.³ If approved, the Petition would ensure that customers receive the full benefit of all actual margin credits in the future (rather than a test year representative amount), and in fact, receive them more quickly. Approval of Minnesota Power's Petition will enable the Company to withdraw its current rate case and refund all interim rates.

At this time, the following parties to the rate case proceeding have indicated support for Minnesota Power's proposal: the Department of Commerce, Division of Energy Resources, Citizens Utility Board, Energy CENTS Coalition, International Brotherhood of Electrical Workers Local 31, and the Clean Energy Organizations (Fresh Energy, Clean Grid Alliance, Sierra Club, and Minnesota Center for Environmental Advocacy). Minnesota Power has also had productive discussions with the other parties to the currently-pending rate case, some of whom continue to evaluate the proposal as of this filing, and defers to each party to submit comments on the Petition as they may choose.

To allow time for this Petition to be evaluated by the Commission, while also providing immediate rate relief, Minnesota Power makes two initial requests while the Petition is being evaluated: (1) that the Administrative Law Judge suspend all deadlines in the current rate case proceeding as soon as administratively possible, and (2) that the Commission approve an immediate reduction in interim rates effective May 1, 2020.⁴

² Asset-based wholesale margin credits are the net revenue that results from a utility selling excess energy and capacity that is not needed to serve the utility's retail customers in the wholesale MISO market. The difference between the revenues and costs from these sales results in asset-based whole margin credits ("margin credits"). Since retail customers pay for the costs of the generation assets that the utility uses to generate wholesale margins, these customers must also receive a reasonable credit from these wholesale transactions. Minnesota Power currently provides its ratepayers with these margins credits as an offset to Minnesota Power's revenue requirement at a fixed level that is established as part of a base rate case.

³ See Xcel Energy's Annual Report 2018-2019 Annual Adjustment of Charges Report-Electric, Docket No. E999/AA-20-171 at 3 (March 2, 2020); Otter Tail Power Company's 2020 Annual Automatic Adjustment of Charges Report-Electric, Docket No. E999/AA-20-171 at Part E, Section 2, Attachment D at p. 1 (Feb. 28, 2020).

⁴ While the Company may not be able to implement this reduction on May 1, 2020 given the current timing, the Company will track and verify that the amounts returned to customers upon Commission approval of the Petition reflect a May 1, 2020 effective date and align with the request to move the margin credits to the FAC effective May 1, 2020.

To these ends: First, along with this letter Minnesota Power is filing a Motion to Suspend the Procedural Schedule in Docket No. E015/GR-19-442 (the 2019 Rate Case docket), requesting that the Administrative Law Judge immediately and indefinitely suspend the Company's current rate case proceeding. This suspension has the support of most parties to the 2019 Rate Case, will provide the Commission with time to evaluate the Petition, and will avoid the unnecessary investment of time and resources in the rate case contested proceeding while the Petition is pending. Since Direct Testimony in the rate case is currently due May 7, 2020, the Company respectfully requests that this Motion be granted as soon as administratively possible. At such time when the Commission's decision on the Petition becomes clearer, the Company will, depending on the resolution, either withdraw the rate case or work with parties to the rate case proceeding to revise the current schedule.⁵

Second, by this letter and the accompanying Petition filed in Docket No. E015/M-20-429, Minnesota Power asks the Commission to reduce interim rates effective May 1, 2020, from the current 5.8 percent increase to 4.1 percent, which is equal to the long-term, projected net impact to base rates and the FAC of moving margin credits to the FAC effective May 1, 2020. This reduction would continue pending resolution of this proposal, and would provide some immediate rate relief to the Company's customers.⁶ Minnesota Power respectfully requests that the Commission set the interim rate change for decision immediately, and then resolve the Petition within 45 days⁷ in order to facilitate swift resolution and the full return of interim rates to customers as early as possible, or to minimize delays in the rate case in the event the Petition is not approved.

Further, upon approval of Minnesota Power's Petition and inclusion of margin credits in the FAC effective May 1, 2020, the Company will move to withdraw its current rate case and refund all interim rates. After Commission approval of this withdrawal, the Company will prepare a subsequent compliance filing comparing the amounts collected through interim rates prior to proposal-approval to the amount that would need to be collected to implement the proposed changes to base rates and the FAC as of May 1, 2020. Any amounts collected in excess would be refunded to customers. The net difference between these amounts is currently estimated to result in a refund to customers of approximately \$12 million.

⁵ While the Company is requesting that the Commission review the Petition on an expedited basis, it acknowledges that if the Commission declines to approve the proposal, the rate case must be restarted and an extension of existing rate case deadlines set forth in the Fifth Prehearing Order will need to be extended. To facilitate the Company's Motion to Suspend the Procedural Schedule, the Company agrees to waive the statutory deadline for the Commission's final decision for period of 60 days.

⁶ The average Minnesota Power residential retail customer received an increase of \$4.48/month effective January 1, 2020 from the rates effective on December 31, 2019. This amount would decrease to an estimated \$3.53/month in 2020 under the Company's proposal.

⁷ Minn. R. 7829.1275 ("Except for time periods set by statute, the commission may vary the time periods established by this chapter on its own motion or at the request of a person for good cause shown..."); *In the Matter of the Petition of N. States Power Co d/b/a Xcel Energy for Approval of True-Up Mechanisms*, Docket No. E002/M-19-688, ORDER APPROVING TRUE-UPS AND REQUIRING XCEL TO WITHDRAW ITS NOTICE OF CHANGE IN RATES AND INTERIM PETITION at 2 (Mar. 13, 2020) (Commission heard and orally approved the proposal on December 12, 2019, less than 45 days after Xcel Energy filed its Petition on November 1, 2019); Minn. R. 7829.4000 (regarding emergency procedures).

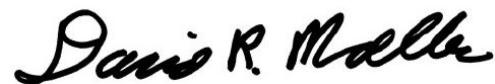
For 2020, the Company anticipates that approval of its Petition would result in a net revenue requirement increase (base rates plus FAC) of 2.8 percent, reduced from the current interim rate increase of 5.8 percent.⁸ The net impact beyond 2020 will depend on the margin credits available to pass onto customers through the FAC, but is currently estimated to be approximately 4.1 percent. **Attachment A** to this filing includes detailed calculations showing the rate savings and impacts of the Company's proposal.

The Company's Petition also includes other customer benefits and protections in the event it is approved. First, the Company would agree it will not file a rate case before November 1, 2021, absent Energy-Intensive Trade-Exposed ("EITE") customers shutting down or idling at least 50 megawatts of load, below their actual load as of April 20, 2020, for a period of at least three months. If such a load reduction occurs earlier than November 1, 2021, the Company commits to providing written notice to the Commission explaining the loss of load at least 90 days before the intended filing date. However, in no event will the Company file a rate case before March 1, 2021, and it is the Company's intention to avoid a rate case filing prior to November 1, 2021.

Additionally, Minnesota Power proposes to address revenue neutral residential rate design issues in the Company's time-of-day docket (Docket No. E015/M-12-233).⁹ The Company will work with stakeholders in the time-of-day docket on residential rate design options that may be important to address in that docket. Further, Minnesota Power proposes to maintain the EITE rate to February 1, 2021, consistent with the Commission's March 17, 2020 Order in the EITE docket.¹⁰

Minnesota Power understands that its request is unconventional, but so are our current circumstances. At its core, Minnesota Power's proposal provides an immediate rate reduction for customers and spares stakeholders the time and costs associated with continuing with a rate case during the current crisis. With that in mind, Minnesota Power appreciates your sincere consideration and attention at this difficult time.

Sincerely,



David R. Moeller
Senior Attorney and
Director of Regulatory Compliance

Enclosure

cc: Attached Service List

⁸ Percentages compared to rates effective on December 31, 2019.

⁹ *In the Matter of Minnesota Power's Compliance Report for its Temporary Rider for Residential Time-of-Day Rate for Participants of the Smart Grid Advanced Metering Infrastructure Pilot Project*, Docket No. E015/M-12-233.

¹⁰ *In the Matter of Minnesota Power's Revised Petition for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider*, Docket No. E015/M-16-564, ORDER APPROVING RIDER EXTENSION WITH CONDITIONS (Mar. 17, 2020).

Flow Margin Credits through the FAC

<i>(in millions)</i>	December 31, 2019 Rates	Approved Interim Rates	Proposed Final Rates	Proposal Jan-Apr 2020	Proposal eff. May 1, 2020
Assumptions					
Base Rates	Base	Base + 5.8%	Base + 10.59%	Base	Base
Margin Credit Location	Base Rates	Base Rates	Base Rates	Base Rates	FAC*
Base Rates – Rev. Reqs.				<i>annualized</i>	<i>annualized</i>
Margin Credit in Base Rates	(35.8)	(20.2)	(10.0)	(35.8)	-
<u>Other Revenue Requirement</u>	<u>658.9</u>	<u>679.4</u>	<u>699.1</u>	<u>658.9</u>	<u>658.9</u>
Total Base Rate Rev. Req.	623.1	659.2	689.1	623.1	658.9
FAC Impact					<i>estimate</i>
Margin Credit in FAC	-	-	-	-	(10.0)
Results of Proposal					
Total Rev. Req. (Base + FAC)	623.1	659.2	689.1	623.1	648.9
Residential Bill Impact of Base + FAC Changes**		\$4.48/month	\$11.66/month	\$0/month	\$3.53/month
Percent Change vs. 12/31/19 Rev. Req.		5.8%	10.6%	0.0%	4.1%
<i>Total 2020 Test Year % Change***</i>				2.8%	

*Proposal includes flowing actual Margin Credits through the FAC; number shown is budget to illustrate proposal.

**Assumes all interim rates refunded and Margin Credits in FAC 5/1/20. Actual split between interim rates/FAC may differ.

***Weighted average, reflecting Jan. to April Margin Credits in base rates and May to Dec. Margin Credits in FAC.

IN THE MATTER OF THE EMERGENCY PETITION
OF MINNESOTA POWER FOR APPROVAL TO
MOVE ASSET-BASED WHOLESALE SALES
CREDITS TO THE FUEL ADJUSTMENT CLAUSE
AND RESOLVE RATE CASE

MPUC DOCKET No.: E015/M-20-429

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR AUTHORITY TO
INCREASE RATES FOR ELECTRIC UTILITY
SERVICE IN MINNESOTA

MPUC DOCKET No.: E015/GR-19-442
OAH DOCKET No.: 8-2500-36575

CERTIFICATE OF SERVICE

Jill N. Yeaman certifies that on the 23rd day of April, 2020, on behalf of Minnesota Power, she efiled a true and correct copy of a **LETTER TO THE EXECUTIVE SECRETARY AND THE ADMINISTRATIVE LAW JUDGE** via eDockets (www.edockets.state.mn.us) in the above-referenced dockets. Said documents are also served via U.S. Mail or email as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

*/s/ Jill N. Yeaman*_____

Jill N. Yeaman

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Andresen	info@sosbluewater.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kristin	Berkland	kristin.berkland@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mnsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_Official CC Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-442_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_Official CC Service List
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tony	Mancuso	mancusot@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_Official CC Service List
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-442_Official CC Service List