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May 21, 2020

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

Re: *Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota*
Docket No. E-015/GR-19-442

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. E-015/M-20-429

Dear Mr. Seuffert:

At the request of Commission Staff, the Office of the Attorney General—Residential Utilities Division (“OAG”) provides the attached schedule to illustrate how the class rate increases would be calculated under the OAG’s recommendation to “reallocat[e] the EITE discount’s impact among all classes according to the existing base-rate revenue apportionment before applying the proposed 5.75 increase to base rates.”¹

The OAG’s schedule starts with the classes’ present-revenue amounts as shown in Attachment C to Minnesota Power’s May 18, 2020 reply comments, then adds \$16,853,579 to Large Power revenues to reflect their pre-EITE-discount base revenues. The resulting interclass revenue apportionment is used as the basis for calculating 5.75 percent class increases.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

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¹ OAG Initial Comments at 18–19 (May 11, 2020); *accord* OAG Reply Comments at 11 (May 18, 2020).

MINNESOTA POWER
COMPARISON OF OPERATING REVENUES
PRESENT VS. GENERAL RATES
TEST YEAR 2020
RATE CASE RESOLUTION PROPOSAL - OAG REVISED

Rate Classes	Customers	MWh	Present Revenues Before EITE-Rider Impact [1]	Operating Revenues		Present Revs. w/ EITE Impact Reapportioned [4]	Base-Rate Increase	
				Base-Rate Revenue Apport. [2]	EITE Impact Allocated by Base- Rate Apport. [3]		Reapportioned Base-Rate Increase [5]	Base-Rate % Increase [6]
1 Residential	112,654	948,850	\$ 103,155,762	16.4%	\$ (2,761,659)	\$ 100,394,103	\$ 5,772,661	5.75%
2 General Service	20,894	678,755	\$ 72,603,025	11.5%	\$ (1,943,709)	\$ 70,659,316	\$ 4,062,911	5.75%
3 Large Light & Power	446	1,324,161	\$ 107,257,130	17.0%	\$ (2,871,460)	\$ 104,385,670	\$ 6,002,176	5.75%
4 Large Power	9	5,288,437	\$ 343,001,175	54.5%	\$ (9,182,738)	\$ 333,818,437	\$ 19,194,560	5.75%
5 Municipal Pumping	-	-	-	-	-	-	\$ -	0.00%
6 Lighting	5,045	20,418	\$ 3,511,645	0.6%	\$ (94,013)	\$ 3,417,632	\$ 196,514	5.75%
7 Total	139,048	8,260,621	\$ 629,528,737	100.0%	\$ (16,853,579)	\$ 612,675,158 [7]	\$ 35,228,822 [8]	5.75%

Column [1]: Lines 4 and 7 were increased by \$16,853,579 to reflect base revenues before EITE-rider credit. See OAG Init. Attach. C at 2 (MP Resp. to OAG IR No. 6002).
Column [2]: Column [1], lines 1 through 6 / Column [1], line 7
Column [3]: Column [2], lines 1 through 6 * (\$16,853,579)
Column [4]: Column [1] + Column [3]
Column [5]: Column [5], line 7 * Column [2], lines 1 through 6
Column [6]: Column [5] / Column [4]

[7] Ties to present-revenue subtotal on Line 7 of Attachment C to MP's May 18, 2020 reply comments.

[8] = Column [4], line 7 * 5.75% overall increase.

AFFIDAVIT OF SERVICE

Re:*In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota*
MPUC Docket No.E-015/GR-19-442

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.E-015/M-20-429

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on the 21st day of May, 2020, I e-filed with eDockets *Comments of the Minnesota Office of the Attorney General—Residential Utilities Division* and served the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal
JUDY SIGAL

Subscribed and sworn to before me
this 21st day of May, 2020.

/s/Patricia Jotblad
Notary Public

My Commission expires: January 31, 2025.

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Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-442__Official CC Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_20-429_M-20-429
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_20-429_M-20-429
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-429_M-20-429
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_20-429_M-20-429
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Barbara	Gervais	toftenn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_20-429_M-20-429
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-429_M-20-429
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Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-429_M-20-429
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James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
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Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Kavita	Maini	kmairi@wi.r.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-429_M-20-429
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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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_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_20-429_M-20-429
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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_20-429_M-20-429
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Ins itute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_20-429_M-20-429
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_20-429_M-20-429
Eilanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_20-429_M-20-429
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Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
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Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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_20-429_M-20-429
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_20-429_M-20-429
Buddy	Robinson	buddy@citizenstfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_20-429_M-20-429
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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_20-429_M-20-429
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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