



AN ALLETE COMPANY

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August 22, 2018

**VIA ELECTRONIC FILING**

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

**RE: In the Matter of Minnesota Power's Petition for Approval of  
a 250 MW Nobles 2 Wind Power Purchase Agreement**

Dear Mr. Wolf:

Minnesota Power (the "Company") hereby submits a revised Petition for Approval of an Amended and Restated Power Purchase Agreement ("PPA") with Tenaska Inc. for the purchase of 250 MW of wind-generated energy and capacity from the Nobles 2 wind generation facility located in Nobles County in southwestern Minnesota, to serve Minnesota Power's customers. This Petition is filed in accordance with the Commission's September 19, 2017 Order Referring Gas Plant for Contested Case Proceedings, and Notice and Order for hearings in Docket Nos. E-015/AI-17-568 and E-015/RP-15-690, which directed the Company to refile its wind PPA in a separate docket. In this Petition, the Company requests approval of the wind PPA portion of the Company's overall *EnergyForward* Resource Package, a unique and synergistic combination of resources designed as an integrated package.

Certain portions of this Petition contain trade secret information and are marked as such, pursuant to the Commission's Revised Procedures for Handling Trade Secret and Privileged Data which further the intent of Minn. Stat. § 13.37 and Minn. Rule 7829.0500. As required by the Commission's Revised Procedures, a statement providing justification for excising the Trade Secret Data is included in the Petition.

Please contact me at the number above if you have any questions about this filing.

Yours truly,

A handwritten signature in black ink, appearing to read "Susan Ludwig", written in a cursive style.

Susan Ludwig

## **STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION**

Pursuant to the Commission's revised Procedures for Handling Trade Secret and Privileged Data in furtherance of the intent of Minn. Stat. § 13.37 and Minn. Rule 7829.0500, Minnesota Power has designated portions of the attached Petition for Approval of Wind PPA ("Petition") and appendices as Trade Secret.

Minnesota Power's filing includes commercially-sensitive information related to request for proposals bidder and selection information; power purchase agreement and other agreement terms, and cost and pricing information that is materially sensitive and commercially valuable to Minnesota Power. Minnesota Power follows strict internal procedures to maintain the secrecy of all of this information in order to capitalize on the economic value of the information. As a result of public availability, Minnesota Power and its customers would suffer severe competitive implications, including a detrimental effect on energy costs paid by Minnesota Power's customers.

Certain portions of the Nobles 2 Wind PPA included in Appendix A and the Sedway Report in Appendix B have been designated as non-public. Minnesota Power considers the marked information to be trade secret as it contains information about contractually-negotiated terms which derive independent economic value from not being generally known or readily ascertainable by other persons, who could obtain economic value from their disclosure or use. To maintain the Company's competitiveness in contract negotiations regarding these terms, Minnesota Power maintains the confidentiality of these data. Minnesota Power has taken reasonable precautions to maintain confidentiality and this information is, therefore, trade secret, as defined by Minn Stat. § 13.37, subd. 1(b).

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 22<sup>nd</sup> day of August, 2018, she served Minnesota Power’s Petition for Approval via electronic filing on the Minnesota Public Utilities Commission and the Office of Energy Security. The persons on E-Docket’s Official Service List for this Docket were served as requested.



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Jodi Nash

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Paper Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
David	Chura	dchura@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Paul	Ciesielski	Paul.Ciesielski@arcelormittal.com	ArcelorMittal	3300 Dickey Road  East Chicago, IN 46312	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Jack	Croswell	Jack.croswell@cliffsnr.com	Hibbing Taconite	P O Box 589  Hibbing, MN 55746	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	GEN_SL_Minnesota Power_MP's Large Power Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	Yes	GEN_SL_Minnesota Power_MP's Large Power Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417  Mountain Iron, MN 55768	Paper Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050  Boise, ID 83799-0050	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Sarah	Manchester	sarah.manchester@sappi.c om	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power 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	GEN_SL_Minnesota Power_MP's Large Power Service List
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street  Clouquet, MN 55720	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	GEN_SL_Minnesota Power_MP's Large Power Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028  Pittsburgh, PA 15219	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Santi	Romani	N/A	United Taconite	P O Box 180  Eveleth, MN 55734	Paper Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	GEN_SL_Minnesota Power_MP's Large Power Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	GEN_SL_Minnesota Power_MP's Large Power Service List