



May 1, 2025

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

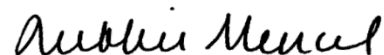
Re: In the Matter of Minnesota Power's Petition for Approval of the Annual Automatic Adjustment Charges for the period of January 2024 through December 2024
Docket No. E015/AA-23-180
REPLY COMMENTS

Dear Mr. Seuffert:

Minnesota Power respectfully submits these Reply Comments in response to the Initial Comments submitted by the Minnesota Department of Commerce, Division of Energy Resources in the above referenced Docket.

Please contact me at (218) 355-3182 or dmencel@mnpower.com if you have any questions regarding this filing.

Kind Regards,



Debbie Mencil
Regulatory Compliance Specialist

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Attach.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Minnesota Power's Petition for
Approval of the Annual Automatic Adjustment Charges
for the period of January 2024 through December 2024

Docket No. E015/AA-23-180
**MINNESOTA POWER'S
REPLY COMMENTS**

I. INTRODUCTION

On April 15, 2025, the Minnesota Department of Commerce, Division of Energy Resources ("Department") submitted its Comments¹ in the above-referenced Docket to the Minnesota Public Utilities Commission ("Commission"). The department reviewed Minnesota Power's (the "Company") Petition² for approval of the 2024 Annual Automatic Adjustment True-Up Report of Forecasted Fuel and Purchased Energy Rates and concluded that the Company's actual fuel and purchased power costs for 2024 were reasonable and prudent, and that the Company correctly calculated its 2024 Fuel Clause Adjustment (FCA)/Forecasted Purchased Energy (FPE) Rider under-collection of \$3,876,222. The Department requested additional information regarding the 2024 true-up factor and supporting calculations. The Company provides the requested information in the following Reply Comments.

II. RESPONSES TO REQUESTED INFORMATION

A. 2024 True-Up Factor and Supporting Calculations

The Department requested that the Company provide its 2024 true-up factor and supporting calculations.

¹*In the Matter of Minnesota Power's Petition for Approval of the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024*, Department of Commerce Comments, April 15, 2025, Docket No. E015/AA-23-180 (eDockets) [20245-217707-02](#)

²*In the Matter of Minnesota Power's Petition for Approval of the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024*, Minnesota Power Petition, March 3, 2025, Docket No. E015/AA-23-180 (eDockets) [20253-215998-01](#)

The True-Up factor is calculated by dividing the True-Up amount of \$3.8M by the applicable 2025 and 2026 sales to which the True-Up rate will apply.

Supporting calculations are provided in Attachment 1 – FAC Calculation 2024 – True Up Rates to these Reply Comments, which include detailed breakdowns of the true-up amount, forecasted sales, and the resulting factor.

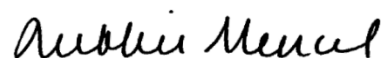
III. CONCLUSION

Minnesota Power appreciates the Department's thorough review and recommendations. Based on the Department's findings and the Company responses provided herein, the Company respectfully requests that the Commission take the following actions:

1. Find Minnesota Power's actual 2024 fuel and purchased power costs recoverable through the FCA/FPE rider were reasonable for 2024.
2. Find Minnesota Power correctly calculated its 2024 FCA/FPE Rider under-collection of \$3,876,222.
3. Allow Minnesota Power to collect \$3,876,222 in the 12-month period following approval by the Commission.
4. Approve the compliance reporting portions of Minnesota Power's Petition.

Dated: May 01, 2025

Respectfully submitted,



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STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 1st day of May, 2025, I electronically filed a true and correct copy of Minnesota Power's Reply Comments in **Docket No. E015/AA-23-180** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Tiana Heger