

December 20, 2024

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E015/D-24-324

Dear Mr. Seuffert:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*Petition of Minnesota Power for Approval of 2024 Remaining Life
Depreciation.*

The Petition was filed by Minnesota Power on September 24, 2024.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

CA/JT/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/D-24-324

I. INTRODUCTION

On September 24, 2024, Minnesota Power (or “the Company”) filed its 2024 Remaining Life Depreciation Petition (Petition) requesting Commission approval of its proposed depreciation rates for the Company’s production plant accounts and general plant account 3900 – Structures and Improvements for calendar year 2024. Minn. R. 7825.0500-7825.0900 require utilities to seek and receive approval of their depreciation rates and methods from the Minnesota Public Utilities Commission (“Commission”), as well as the life and salvage assumptions used to derive those depreciation rates. The rules also state that the Commission shall certify by order the depreciation rates it considers reasonable and proper.

In its Petition, Minnesota Power proposed to adjust the remaining lives of all facilities for one year’s passage of time, but proposed no changes to the estimated retirement years of any facilities. The Company also proposed significant increases to the estimated salvage costs for three of its production plants: Boswell Energy Center (“BEC”), Laskin Energy Center (“LEC”), and Taconite Harbor Energy Center (“THEC”). For BEC and LEC, the increases reflect the expected impact of new regulations imposed by the Environmental Protection Agency for inactive, or “Legacy,” surface impoundments of coal combustion residuals (“CCR”). The increase for THEC is the result of actual decommissioning costs exceeding previous estimates as the facility is currently being decommissioned. Finally, the Company also proposed small changes to the assumed salvage rates for its wind facilities.

Minnesota Power estimated that the proposed changes result in an estimated increase to 2024 annual depreciation expense of \$7.1 million, or 6.2 percent, relative to depreciation expense under its currently approved depreciation rates.¹ The Company stated it is evaluating cost recovery options and other rate mitigation ideas for the additional depreciation expense, including whether there are cost recovery options outside of a rate case.

¹ Petition, p. 13.

II. PROCEDURAL BACKGROUND

October 3, 2023	The Commission approved Minnesota Power's last annual remaining life depreciation filing on October 3, 2023 in Docket No. E-015/D-23-340.
September 24, 2024	Minnesota Power filed a petition for approval of its annual 2024 Remaining Life Depreciation.

III. DEPARTMENT ANALYSIS

For utility rate regulation purposes, depreciation accounting is a process of allocation, not of valuation. It is a system of accounting which aims to distribute cost of capital assets, less salvage, over the estimated useful life in a systematic and rational manner.²

The Minnesota Department of Commerce (Department) reviewed Minnesota Power's Petition to determine whether the filing complies with applicable statutes, rules, and Commission orders and to evaluate whether the Company's proposals are reasonable.

A. STATUTORY AND RULE REQUIREMENTS

Minn. Stat. § 216B.11 and Minn. R. 7825.0500-7825.0900 require public utilities to seek Commission approval of their depreciation rates and methods. Utilities must use straight line depreciation unless the utility can justify a different method.³ A straight line method charges the original cost of an asset, adjusted for net salvage, to expense through equal annual charges over the asset's probable service life.⁴ The probable service life is that period of time extending from the asset's installation date to its forecasted retirement date.⁵

An additional aspect of the depreciation process, the depreciation technique, informs what measure of the asset's service life is used to calculate the depreciation rate. For companies using the "remaining life" (RL) technique to determine the depreciable (useful) lives of their capital assets, depreciation rates must be updated annually to reflect the passage of time and the impact of plant activity, such as capital improvements or retirements. The Commission has historically required utilities using a remaining life technique to make annual depreciation filings to updates their rates.

Based on its review, the Department concludes Minnesota Power's Petition complies with the applicable statutes and rules.

² [Minn. R. 7825.0500](#), subpart 7.

³ [Minn. R. 7825.0800](#).

⁴ [Minn. R. 7825.0500](#), subp. 14.

⁵ [Minn. R. 7825.0500](#), subp. 10.

B. COMPLIANCE WITH PRIOR COMMISSION ORDERS

In compliance with the Commission's prior orders, including its October 3, 2023 Order in Docket No. E015/D-23-340, Minnesota Power included in its Petition a comparison of the remaining depreciable lives proposed in its depreciation filing and the remaining operating lives approved in the Company's most recently approved integrated resource plan (IRP), Docket No. E015/RP-21-33, with an explanation of any differences.⁶ The remaining lives proposed in Minnesota Power's Petition align with the operational lives approved in the Company's most recent IRP except as noted below for the Company's thermal production plants.

In addition, as required by the Commission's January 14, 2019 Order in Docket No. E015/D-18-544 and accepted in Docket No. E015/D-19-534, Minnesota Power separately lists and depreciates its building structures (within Account 3900) having an investment cost of \$1.0 million or more.⁷

C. PROPOSED USEFUL LIVES

C.1. Hibbard, LEC, and THEC

While the 2021 IRP reflected estimated operational retirement years of 2035 for both Hibbard Renewable Energy Center (HREC) and Laskin Energy Center (LEC), the estimated retirement years for these plants for depreciation purposes are 2029 and 2030 respectively.⁸ The Company noted in its Petition that a retirement study for HREC will be included in the Company's next IRP to be filed by 2025.⁹ The Company also stated that at the time of the 2021 IRP, a retirement study had not yet been completed for LEC and no retirement date was identified.¹⁰ These shorter depreciation remaining lives are consistent with the lives reviewed and approved in the Company's prior remaining life depreciation proceeding¹¹ as well as the Company's recently concluded rate case, Docket No. E015/GR-23-155 (the 2023 Rate Case). Therefore, the Department concludes the proposed useful lives for HREC and LEC are reasonable.

The Commission approved the retirement of Taconite Harbor Energy Center (THEC) in the 2021 IRP, and the Company approved amortization of THEC's remaining net plant balance and decommissioning costs by December 31, 2026 in Docket No. E015/GR-21-335, which is consistent with the three-year remaining life proposed in the Petition.

⁶ Petition, pp. 6-11.

⁷ Petition, p. 12 and Appendix A-1, p. 1 of 1, Structures & Improvements. Group depreciation is applied to the remaining building/structures in Account 3900.

⁸ Petition, pp. 6-8.

⁹ Petition, p. 7.

¹⁰ Petition, p. 8.

¹¹ Docket No. E015/D-23-340.

C.2. BEC

In its Petition, the Company noted that the Commission's Order on its 2021 IRP requires the Company to cease coal operations at Boswell Energy Center Unit 3 (BEC 3) by December 31, 2029, six years earlier than had been previously planned. Despite this change, the Company represents in its Petition that BEC 3's estimated operational life still runs through 2035. The Company noted that the 2021 IRP Order requires the Company to evaluate converting BEC 3 to a synchronous condenser upon retirement, and that the Company will evaluate re-use of valuable infrastructure at the plant.¹² Minnesota Power requests that the remaining net plant balances of BEC 3, BEC 4, and BEC Common be recovered based on an anticipated retirement year of 2035.¹³

The Commission recently considered the treatment of remaining depreciable lives of coal facilities experiencing early retirements in Docket No. E002/GR-21-630, *In the Matter of the Application of Northern States Power Company, dba Xcel Energy, for Authority to Increase Rates for Electric Service in the State of Minnesota*. The Commission ordered a new docket (E002,015,017/CI-23-375) be opened to investigate depreciation accounting or other ratemaking issues for retiring electric generating facilities for Xcel Energy, Minnesota Power, and Otter Tail Power, and that the depreciation adjustments for two retiring Xcel facilities be delayed to Xcel's next rate case or other appropriate proceeding. This docket will also explore if the Inflation Reduction Act could provide opportunities to mitigate costs for ratepayers without leaving the Company uncompensated for early retirement of generation facilities. This Docket is pending before the Commission.

The Company's proposed remaining lives for BEC 3, BEC 4, and BEC Common are consistent with the Commission's Order in the Company's prior remaining life depreciation proceeding (which was decided after the Commission's final Order in the 2021 IRP proceeding), as well as the approved settlement agreement in the 2023 Rate Case. Therefore, the Department concludes that the Company's proposals are reasonable.

D. DECOMMISSIONING COST ESTIMATES

D.1. Legacy Coal Combustion Residuals Rule

In its Petition, Minnesota Power proposed to adjust its net salvage rates for BEC and LEC to reflect the expected costs of complying with new regulations related to coal combustion residuals ("CCR") enacted in 2024, known as the "Legacy CCR Rule." The Company estimated the total cost to comply with these new regulations to be \$70 million, and proposed to increase its annual depreciation expense for BEC and LEC by a total of approximately \$7 million per year as a result.

Attachment B-2 to the Company's Petition contains a one-page summary of the total expected costs associated with eight different potential compliance "pathways" and shows a wide range of potential costs, from \$3 million to \$159 million. However, the Petition itself contains no discussion or

¹² Petition, p. 9.

¹³ Petition, p. 10.

explanation of the new regulations themselves, how the rules apply to the Company, or any of the eight potential compliance pathways.

In response to an information request (“IR”), the Company provided the following explanation of the new Legacy CCR Rule:

On May 8, 2024, the EPA's final CCR Legacy Impoundment Rule was published in the Federal Register. The final rule expanded the scope of units regulated under the CCR rule to include legacy impoundments (inactive surface impoundments at inactive facilities) and created a new category of units called CCR Management Units (CCRMUs), which includes inactive and closed impoundments and landfills as well as other non-containerized accumulations of CCR. The final rule requires regulated generating facilities to conduct a site evaluation and identify all past deposits of CCR materials, CCRMUs, and Legacy Impoundments. CCRMUs and Legacy Impoundments are required to close or re-close to meet current closure standards, install groundwater monitoring systems, conduct groundwater monitoring, and implement groundwater corrective actions as necessary. The eight pathways in Appendix B represent compliance paths for monitoring and closure of potential CCRMUs; Minnesota Power does not have Legacy Impoundments. The need for closure, and the specific pathway selected, will be based on the results of the site evaluation.¹⁴

In its Petition, the Company highlighted two particular pathways as representing the low and medium cost estimates (approximately \$51 million and \$85 million, respectively) of pathways that are likely to meet the requirements of the Legacy CCR Rule. Minnesota Power also provided a brief explanation of how it selected those two scenarios in response to an information request.¹⁵ However, as noted above, the specific pathways for individual sites will be based on the results of full site evaluations, and the Company estimates that full site evaluations are only 5-10% complete, and are not expected to be completed until February 2026 at the earliest.¹⁶

The Department is concerned about the very high level of uncertainty surrounding the Company's estimates. As noted above, the Company's Petition contains very little information about the Legacy CCR Rule and its expected impacts on Minnesota Power, and the Company's responses to information requests make clear that it is only in the very beginning stages of assessing the potential costs. The Department is concerned that this lack of information and record development does not provide an adequate basis to begin including these expected costs in depreciation expense. Further, any expense determined in this Docket will likely serve as the basis for a proposal from the Company for cost

¹⁴ See Attachment 1 (response to DOC IR 2)

¹⁵ See Attachment 2 (response to DOC IR 8)

¹⁶ See Attachment 3 (response to DOC IR 7)

recovery, and the Department will likely be reluctant to support such a proposal without a more thorough record on the reasonableness and prudence of the costs.

The Department notes that Xcel Energy's recently-filed electric rate case includes testimony related to the Legacy CCR Rule that makes clear that it is also likely to incur significant costs as a result of the new regulations.¹⁷ However, Xcel Energy is not proposing to begin including these costs in depreciation expense immediately. Instead, it is proposing to wait until it is farther along in its assessment of the new regulations and its estimated costs are better known before recognizing the expense, and to use a tracker mechanism and deferred accounting to track and record costs in the meantime.¹⁸

The Department appreciates the Company's attempt to proactively address the expected costs resulting from the new Legacy CCR rule, and does not strongly oppose Minnesota Power's proposal to begin including these expected costs in the decommissioning component of depreciation expense. However, the Department is concerned about the high level of uncertainty surrounding these cost estimates, and cannot guarantee agreement with eventual cost recovery proposals that Minnesota Power may present. At this time, given the high degree of uncertainty surrounding the level and timing of expected compliance costs, the Department would also not oppose delaying the recognition of this new expense, as is being contemplated by Xcel Energy.

The Department requests that Minnesota Power address these options further in Reply Comments.

D.2. Taconite Harbor Decommissioning

In its Petition, Minnesota Power proposed to increase the net salvage rate for Taconite Harbor Energy Center ("THEC") to reflect an increase in estimated total decommissioning costs from \$16.7 million¹⁹ to \$25.4 million,²⁰ resulting in an increase in annual depreciation expense of approximately \$1.9 million. The Company stated the variances between the two estimates are attributable to multiple factors. These factors include an original high-level estimate from a contracted engineering firm with a plus or minus of 20 percent, inflation over the past four years, additional remediation of material discovered in 2024, and additional regulated materials found in accessing areas of buildings not previously accessible. Also impacting the estimate was additional remediation of a remaining coal pile, needing disposal in an environmentally acceptable landfill one hundred miles away.²¹

¹⁷ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Xcel Energy, Direct Testimony and Schedules Jeffrey L. West, November 1, 2024, Docket No. E002/GR-24-320, (eDockets) [202411-211517-07](#) p. 14-30.

¹⁸ *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Xcel Energy, Direct Testimony and Schedules Allison M. Johnson, November 1, 2024, Docket No. E002/GR-24-320, (eDockets) [202411-211518-02](#) pp. 55-56.

¹⁹ *In the Matter of Minnesota Power's 2021 Remaining Life Depreciation Petition*, Minnesota Power, Petition, Appendix A-6, Docket No. E015/D-21-386, (eDockets) [20216-174972-03](#).

²⁰ Petition, Appendix A6.

²¹ See Attachment 4 (response to DOC IR 5)

The Company provided additional detailed breakdown of the changes in estimated costs since 2021 upon Department request, including increases in management, engineering, and administrative costs, universal and regulated waste removal costs, main plant asbestos removal costs, removal of coal and soil and grass replacement costs, main plant and outbuildings slab and foundation demo costs, and system closure costs.²² Minnesota Power stated actual decommissioning costs through October 2024 are \$15.6 million, with approximately 60 percent of decommissioning activities completed. The Company's estimate of the remaining costs are based in part on actual costs to date and also on executed contracts currently in place.

The Department concludes the new updated decommissioning cost estimate to be reasonable based on the explanation and detailed cost breakdown the Company provided.

D.3. Wind Generation Decommissioning Estimates

The Company proposed changes to the net salvage estimates for its wind generation facilities that, in total, are expected to reduce depreciation expense by approximately \$18,000 per year. The Department reviewed the Company's updated estimates and concludes that they are reasonable.

D.4. Depreciation Expense Cost Recovery Options

Finally, in its Petition, Minnesota Power stated it is currently evaluating cost recovery options and other rate mitigation ideas for the additional depreciation expenses totaling \$7,082,293, including whether there are cost recovery options outside of a rate case. The Department will review and comment on any such proposal when it is made.

IV. DEPARTMENT RECOMMENDATIONS

The Department concludes Minnesota Power's petition generally complies with applicable statutes, rules, and Commission orders.

The Department expects to recommend the Commission:

- Approve Minnesota Power's proposed remaining lives;
- Approve Minnesota Power's proposed net salvage rates for all facilities except for Boswell Energy Center Unit 3, Boswell Energy Center Common, and Laskin Energy Center;
- Approve Minnesota Power's proposed effective date of January 1, 2024 for the Company's proposed depreciation parameters;
- Require Minnesota Power to continue filing, in future depreciation filings, a comparison of the remaining depreciable lives proposed in its depreciation filing and the remaining operating lives approved in the Company's most recent integrated resource plan, with an explanation of any difference;

²² See Attachment 5 (response to DOC IR 9)

- Determine the depreciation rates approved herein are for accounting purposes and neither bind nor preclude modified depreciation expense in a general rate case proceeding;

However, the Department requests that Minnesota Power provide additional discussion in reply comments about potentially delaying recognition of expense related to the Legacy CCR Rule until it has more information about the potential costs, and can provide that information to the Department and the Commission. The Department will make final recommendations to the Commission after it reviews the Company's reply comments.

Attachments



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/D-24-324
Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 10/14/2024
Response Due: 10/24/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Craig Addonizio, Justin Taylor

Email Address(es): craig.addonizio@state.mn.us, justin.taylor@state.mn.us

Phone Number(s): 651-539-1818, 651-539-1031

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: New Legacy CCR Regulations and Compliance Pathways
Reference(s): Petition, Appendix B2

Request:

- a. Please fully explain the requirements of the new Legacy CCR regulations, and explain how each of the eight pathways presented in Appendix B2 do or do not comply with those requirements.
- b. Please describe all sources of uncertainty that explain why the Company is currently unable to select a single pathway that will comply with the Legacy CCR regulations about which of the eight pathways will comply with the new requirements.
- c. Please explain why the Company selected pathways 4 and 7 as the high and low reference scenarios used to develop updated decommissioning cost estimates, and explain why it is reasonable to use the average of those two pathways to estimate decommissioning expense.

Response:

- a. On May 8, 2024, the EPA's final CCR Legacy Impoundment Rule was published in the Federal Register. The final rule expanded the scope of units regulated under the CCR rule to include legacy impoundments (inactive surface impoundments at inactive facilities) and created a new category of units called CCR Management Units (CCRMUs), which includes inactive and closed impoundments and landfills as well as other non-containerized accumulations of CCR. The final rule requires regulated generating facilities to conduct a site evaluation and identify all past deposits of CCR materials, CCRMUs, and Legacy Impoundments. CCRMUs and Legacy Impoundments are required to close or re-close to meet current closure standards, install groundwater monitoring systems, conduct groundwater monitoring, and

To be completed by responder

Response Date: October 16, 2024
Response by: Kurt Anderson
Email Address: kanderson@mnpower.com
Phone Number: 218-355-3322



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

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Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 10/14/2024
Response Due: 10/24/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Craig Addonizio, Justin Taylor

Email Address(es): craig.addonizio@state.mn.us, justin.taylor@state.mn.us

Phone Number(s): 651-539-1818, 651-539-1031

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implement groundwater corrective actions as necessary. The eight pathways in Appendix B represent compliance paths for monitoring and closure of potential CCRMUs; Minnesota Power does not have Legacy Impoundments. The need for closure, and the specific pathway selected, will be based on the results of the site evaluation.

- b. As stated above, the CCR Legacy Rule requires a thorough site evaluation to identify and characterize all deposits of CCR materials. This includes an extensive review of historical documentation, as well as identification of the lateral and vertical extent of all CCR deposits, volume of CCR in each, and the type of CCR materials. When all of this information is not readily available, the facility must conduct field investigations to obtain this data. Completion of the full site evaluation is necessary to determine applicable requirements for each location and select appropriate closure or removal plans. For example, further action may not be required where non-containerized deposits of CCR <1000 tons are identified, and some CCRMUs may qualify for alternative closure options due to previous closure under a State permit program. Given site evaluations and investigations are not yet complete, it would be premature to assume a single pathway until all necessary information has been obtained.
- c. Pathway 4 represents the most likely scenario for in-place management of CCRMUs, which includes a groundwater cutoff, a permeable reactive barrier, and final cover. Pathway 4 is considered to be consistent with state and federal regulatory requirements for containment and cover systems for CCRMUs that may be present onsite which would not be excavated and removed. However, if CCR material from potential CCRMUs needs to be removed and disposed of in a different location, Pathway 7 is the most likely scenario. Pathway 7 includes building a new onsite disposal facility to manage the CCR material from any CCRMUs. The actual closure method will depend on the type and quantity of CCR materials which will be determined by the site evaluation, and applicable closure requirements.

To be completed by responder

Response Date: October 16, 2024
Response by: Kurt Anderson
Email Address: kanderson@mnpower.com
Phone Number: 218-355-3322



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Date of Request: 11/21/2024
Response Due: 12/2/2024

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Assigned Analyst(s): Craig Addonizio, Justin Taylor

Email Address(es): craig.addonizio@state.mn.us, justin.taylor@state.mn.us

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Request Number: 8
Topic: New Legacy CCR Regulations and Compliance Pathways
Reference(s): Petition, Appendix B2; Response to DOC IR 2

Request:

- a. In Minnesota Power's response to DOC IR 2, part c, Pathway 7 "Relocate to New Facility Onsite" was listed as a scenario that may be required should there be CCR material from potential CCRMUs needing to be removed and disposed of in a different location. Why was Pathway 7 chosen as the "low" scenario in determining the average cost estimate, and not Pathway 6, "Relocate to Existing CCR Unit Onsite"?
- b. The Company's response to DOC IR 2, part c, seems to imply that Pathway 4 is the preferred scenario that is consistent with state and federal regulatory requirements, and that if Pathway 4 is later determined to be non-compliant, Pathway 7 is a likely alternative. Given that Pathway 7 is estimated to be more than \$30 million less expensive than Pathway 4, and would also apparently satisfy a more stringent interpretation of CCR compliance requirements, why isn't the Company just planning to follow Pathway 7?

Response:

- a. The CCR Legacy Rule requires the company to determine the amount of CCR materials that may need to be relocated for closure. Until the amount of material present is determined, it is uncertain whether there will be sufficient space in the existing CCR disposal units for additional CCR materials regulated by the CCR Legacy Rule. Should there be sufficient space available in onsite disposal units, the company would likely select Pathway 6 rather than Pathway 7.

To be completed by responder

Response Date: December 2, 2024
Response by: Crystal Tokarczyk
Email Address: ctokarczyk@mnpower.com
Phone Number: 218-355-3461



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- b. Pathway 7 involves the siting and permitting of a new disposal unit onsite. Given the significant complexities and timelines associated with permitting and constructing a new CCR-compliant landfill, it is unclear at this time whether the Company could select this option and still meet the CCR Legacy Rule regulatory timelines for closure.

To be completed by responder

Response Date: December 2, 2024
Response by: Crystal Tokarczyk
Email Address: ctokarczyk@mnpower.com
Phone Number: 218-355-3461



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Request Number: 7
Topic: Site evaluations and investigations
Reference(s): Company Response to DOC IR 2, part b

Request:

- a. In its response to DOC IR 2, part b, the Company stated that site evaluations and investigations are not yet complete. Please list all sites the Company believes require evaluation and investigation.

For each site listed in the response to part a, please describe the evaluation and investigation activity the Company has completed to date.

- b. For each site listed in the response to part a, please describe the site evaluation and investigation activities the Company expects to undertake going forward.
- c. Please provide a rough estimate of the fraction or percentage of total site evaluation and investigation work the Company has completed, and the fraction or percentage of the work that remains.
- d. When does the Company currently expect to complete the remaining site evaluation and investigation work?

Response:

- a. Boswell Energy Center and Laskin Energy Center
The company has performed a preliminary review of potential CCR management units and determined the estimated range of closure options for each pathway.

To be completed by responder

Response Date: December 2, 2024
Response by: Crystal Tokarczyk
Email Address: ctokarczyk@mnpower.com
Phone Number: 218-355-3461



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-
- b. The owner or operator of an active facility must conduct a facility evaluation to identify all CCR management units in accordance with 40 CFR 257.75 [paragraphs \(c\)-\(e\)](#) . At a minimum, the presence or absence of CCR management units at the facility must be confirmed and documented through a thorough evaluation of reasonably and readily available records and include a physical inspection of the facility. Where necessary, the physical inspection must include field investigation activities to fill data gaps, such as conducting exploratory soil borings, geophysical assessments, or any other similar physical investigation activities to establish the location and boundaries of potential or likely CCR management units, and to affirmatively rule out other areas of potential CCR placement at the facility that were identified during the information review or physical inspection.
 - c. The preliminary review work completed to date represents approximately 5-10% of the total scope of work, with 90-95% remaining.
 - d. Facility Evaluation Reports will be complete by February 9, 2026, however, if additional field investigations are required, the due date for completion is February 8, 2027.

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Request Number:	5
Topic:	Taconite Harbor Decommissioning Cost Estimates
Reference(s):	Petition at 5 and Appendix B1; Docket 21-386 Petition, Appendix B-4, Appendix A

Request:

- a. Appendix B-4 of the Company's Petition in Docket No. E015/D-21-386 is the decommissioning study for Taconite Harbor Energy Center that is the source for the previous decommissioning estimate of the \$16.7 million. Appendix A of that decommissioning study contains a summary of that study with separate cost estimates for approximately 25 decommissioning activities. Please provide an updated version of that Appendix A that breaks down the new \$25.4 million cost estimate into the same line-items.
- b. Please describe the reasons for the variances between the previous estimates and the current estimates, and describe the potential for further increases.

Response:

- a. See DOC IR 005.01 ATTACH for updated Appendix A decommissioning activity costs.
- b. Variances between the previous decommissioning estimate of \$16.7 million and the updated estimate of \$25.4 million can be attributed to multiple factors. The original estimate provided by the engineering firm was a high-level estimate +/- 20%. The period between the previous estimate and the new estimate has been impacted by inflation over the past 4 years. During the recent demolition in the spring and summer of 2024 additional remediation of material was discovered which increased the costs. Additional regulated materials found when opening areas of the buildings that were not previously accessible when the plant

To be completed by responder

Response Date: October 24, 2025
Response by: Eric Sutherland, Engineer Senior
Email Address: esutherland@mnpower.com
Phone Number: 218-313-4772



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/D-24-324

Requested From: Minnesota Power

Type of Inquiry: Financial

☐ Nonpublic ☒ Public

Date of Request: 10/14/2024

Response Due: 10/24/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Craig Addonizio, Justin Taylor

Email Address(es): craig.addonizio@state.mn.us, justin.taylor@state.mn.us

Phone Number(s): 651-539-1818, 651-539-1031

ADDITIONAL INSTRUCTIONS:

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was in operation needed to be removed. Additional remediation of the remaining coal pile also attributed to the increase in cost estimate. This material had to be disposed of at a landfill that environmentally accepts this form of material, the closest being 100 miles from the site.

To be completed by responder

Response Date: October 24, 2025
Response by: Eric Sutherland, Engineer Senior
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Phone Number: 218-313-4772

DOC IR 005.01 Attach

Taconite Energy Center Demolition Cost Estimate

ITEM	DESCRIPTION	ESTIMATED QUANTITY	UNIT	2021 COST	2024 COST	Change
1	General Conditions					
	Mobilization and De-Mobilization	1	LS	\$111,000	\$ 620,000	\$ 509,000
	Management, Engineering, Administrative	1	LS	\$739,000	\$ 2,959,546	\$ 2,220,546
	Site Work (i.e. Fencing / Delineation of Work Areas, Erosion	1	LS	\$54,000	\$ 235,000	\$ 181,000
	Subtotal for General Conditions Costs			\$904,000	\$ 3,814,546	\$ 2,910,546
2	Utility Isolation & Temporary Construction					
	Utility Isolations & Cut and Capping	1	LS	\$34,000	\$ 124,313	\$ 90,313
	Subtotal for Utility Isolation Costs			\$34,000	\$ 124,313	\$ 90,313
3	Environmental					
	Universal & Regulated Waste Removal	1	LS	\$510,000	\$ 1,965,630	\$ 1,455,630
	Lead Based Paint Removal on Steel Stacks	1	LS	\$1,167,000	\$ -	\$ (1,167,000)
	Main Plant Asbestos Removal	1	LS	\$3,679,000	\$ 4,944,625	\$ 1,265,625
	Remove 16" of Coal & Replace with 3" Soil and Grass	1	LS	\$1,694,000	\$ 6,030,143	\$ 4,336,143
	Subtotal for Environmental Costs			\$7,050,000	\$ 12,940,398	\$ 5,890,398
4	Demolition					
	Miscellaneous Outbuilding Demo to Grade	1	LS	\$675,000	\$ 1,010,000	\$ 335,000
	Main Plant Demo to Grade	1	LS	\$4,648,000	\$ 4,700,000	\$ 52,000
	Stack & Concrete Silo Demo to Grade	1	LS	\$114,300	\$ 160,000	\$ 45,700
	Main Plant & Outbuildings Slab and Foundation Demo	1	LS	\$620,099	\$ 2,047,000	\$ 1,426,901
	Stack & Concrete Silo Foundation Demo	1	LS	\$46,800	\$ -	\$ (46,800)
	Scrap Prep & Transport Cost	1	LS	\$264,800	\$ -	\$ (264,800)
	Subtotal for Demolition Costs			\$6,368,999	\$ 7,917,000	\$ 1,548,001
5	Water Intake & Discharge					
	System Closure (Capping & Sealing Lines)	1	LS	\$92,000	\$ 1,210,000	\$ 1,118,000
	Subtotal for Intake & Discharge Costs			\$92,000	\$ 1,210,000	\$ 1,118,000
6	Site Work					
	Paving Removals	1	LS	\$67,000	\$ -	\$ (67,000)
	Process & Crush Concrete	1	LS	\$372,000	\$ -	\$ (372,000)
	Backfill & Rough Grading	1	LS	\$268,000	\$ 623,325	\$ 355,325
	Subtotal for Site Restoration Costs			\$707,000	\$ 623,325	\$ (83,675)
	TOTAL DIRECT COSTS			\$15,155,999	\$ 26,629,582	\$ 11,473,583
7	Indirect Costs					
	Engineering / Permitting Support / Construction Management	1	LS	\$1,817,000	\$ 1,898,011	\$ 81,011
	Bonds / Insurance	1	LS	\$303,000	\$ 251,544	\$ (51,456)
	Contingency (10%)	1	LS	\$1,502,000	\$ 1,659,294	\$ 157,294
	TOTAL INDIRECT COSTS			\$3,622,000	\$ 3,808,849	\$ 186,849
	TOTAL DIRECT AND INDIRECT COSTS			\$18,777,999	\$ 30,438,430	\$ 11,660,431
8	Scrap & Equipment Sales					
	Ferrous Metals (Prepared)	7,200	GTONS	(\$1,067,000)	\$ (5,556,785)	\$ (4,489,785)
	Non-Ferrous Metals	1,045,300	POUNDS	(\$1,246,000)	\$ -	\$ 1,246,000
	Subtotal for all Sales			(\$2,313,000)	\$ (5,556,785)	\$ (3,243,785)
	TOTAL NET COST			\$16,464,999	\$ 24,881,645	\$ 8,416,646
9	Owner/Client Costs					
	Part-Time Onsite Management	16	MONTHS	\$198,000	\$ 487,250	\$ 289,250
	GRAND TOTAL COSTS (Including Owner)			\$16,662,999	\$ 25,368,895	\$ 8,705,896



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/D-24-324
Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 11/21/2024
Response Due: 12/2/2024

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Craig Addonizio, Justin Taylor

Email Address(es): craig.addonizio@state.mn.us, justin.taylor@state.mn.us

Phone Number(s): 651-539-1818, 651-539-1031

ADDITIONAL INSTRUCTIONS:

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Request Number: 9
Topic: Taconite Harbor Decommissioning Cost Estimates
Reference(s): Petition, Appendix B1; Response to DOC IR 5

Request:

- a. Please provide actual Taconite Harbor Energy decommissioning costs incurred to date.
- b. Roughly, what fraction or percentage of demolition/decommissioning activity at Taconite Harbor Energy Center is complete?
- c. Please explain how the estimates of total expected Taconite Harbor decommissioning costs provided in response to DOC IR 5 were derived, and provide any calculations, workpapers, spreadsheets, memos, etc. related to the derivation of these estimates. If they are based on a study conducted by the Company or a 3rd party, please provide the study.
- d. Please describe the specific reasons for the changes in estimated costs relative to the 2021 study shown for each of the following line-items:
 - i. Management, Engineering, Administrative (\$2.2 million increase);
 - ii. Universal & Regulated Waste Removal (\$1.5 million increase);
 - iii. Lead Based Paint Removal on Steel Stacks (\$1.67 million decrease to zero);
 - iv. Main Plant Asbestos Removal (\$1.3 million increase);
 - v. Remove 16" of Coal & Replace with 3" Soil and Grass (\$4.3 million increase);
 - vi. Main Plant & Outbuildings Slab and Foundation Demo (\$1.4 million increase);
 - vii. System Closure (Capping & Sealing Lines) (\$1.4 million increase).

To be completed by responder

Response Date: December 2, 2024
Response by: Eric Sutherland
Email Address: esutherland@mnpower.com
Phone Number: 218-313-4772



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Information Request

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Response:

- a. Actual decommissioning costs through October 2024 month-end financial records total \$15,640,361.09.
- b. Approximately 60% of the decommissioning activities are complete at Taconite Harbor Energy Center.
- c. The estimates derived in DOC IR response 5 were based on a combination of actual costs to date and executed contracts that are in place. No additional study was completed after the initial engineering study in 2020. See DOC IR 009.01 ATTACH.
- d. The changes to the estimate as provided in DOC IR 5 response are as follows:
 - i. Management and Engineering, Administrative: Awarded contractor bid breakdown placed more costs in the General Conditions line item than in the detailed line items as was budgeted.
 - ii. Universal and Regulated Waste Removal: The original estimate provided by the engineering firm was a high-level estimate +/- 20%. The period between the previous estimate and the new estimate has been impacted by inflation over the past 4 years. During the recent demolition in the spring and summer of 2024 additional remediation of material was discovered which increased the costs. Additional regulated materials found when opening areas of the buildings needed to be removed that were not previously accessible when the plant was in operation.
 - iii. Lead based paint removal: Owners Engineer and Contractor found an alternate approach to address the lead paint which did not require removing the paint prior to demolition.
 - iv. Main Plant Asbestos removal: The original estimate provided by the engineering firm was a high-level estimate +/- 20%. The period between the original estimate and the new estimate has been impacted by inflation over the past 4 years. During the recent demolition in the spring and summer of 2024 additional remediation of material was discovered which increased actual costs. Additional regulated materials found when opening areas of the buildings needed to be removed that were not previously accessible when the plant was in operation.
 - v. Remove 16" of Coal & Replace with 3" Soil and Grass: When closing the coal pile, the coal was required to be removed to less than 5% visual standard. The bottom of the pile was not a consistent elevation resulting in pockets of coal greater than the budgeted 16". In addition, the

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-
- budget accounted for the known footprint of the pile. Once excavation began it was discovered that coal had been placed outside the known footprint. This material was also buried under 10+ feet of soil which needed to be moved prior to removal of the coal. Permit limitations prevented hauling additional material found when closure activities started to another active coal facility, thus the material needed to be transported and disposed of in a landfill 200 miles away
- vi. Main Plant & Outbuildings Slab and Foundation Demo: The original estimate provided by the engineering firm was a high-level estimate +/- 20%. The period between the original estimate and the new estimate has been impacted by inflation over the past 4 years.
 - vii. System Closure (Capping & Sealing Lines): The original estimate provided by the engineering firm was a high-level estimate +/- 20%. The period between the original estimate and the new estimate has been impacted by inflation over the past 4 years.

To be completed by responder

Response Date: December 2, 2024
Response by: Eric Sutherland
Email Address: esutherland@mnpower.com
Phone Number: 218-313-4772

THEC Decommissioning

Excludes Ash Cell

	Budget	Actuals (5/24)	Remaining	Notes
Indirect				
Internal Resources	\$ 408,493.91	\$ 183,034.62	\$ 225,459.29	
Engineering/Permits	\$ 2,237,742.11	\$ 777,442.22	\$ 1,460,299.89	* B&M, Resolute, & others
Overheads & Insurance	\$ 737,302.39	\$ 187,736.72	\$ 549,565.67	
Directs				
Coal Pile	\$ 6,746,502.63	\$ 6,746,502.63	\$ -	* Complete - Ulland Contract
Demolition	\$ 18,684,214.78	\$ 2,653,249.88	\$ 16,030,964.90	* Independence Excavating
Scrap	\$ (5,556,785.00)	\$ (102,785.00)	\$ (5,454,000.00)	* Independence Excavating
Final Grading	\$ 449,185.00	\$ -	\$ 449,185.00	* To be bid
Contingency	\$ 1,659,293.97	\$ -	\$ 1,659,293.97	
Total	\$ 25,365,949.80	\$ 10,445,181.07	\$ 14,920,768.73	

Taconite Energy Center Demolition Cost Estimate

	ITEM	DESCRIPTION	ESTIMATED QUANTITY	UNIT	2021 COST	2024 COST	Change	Notes
	1	General Conditions						
A		Mobilization and De-Mobilization	1	LS	\$111,000	\$ 620,000	\$ 509,000	Bid Came back higher than budgeted, partially due to location of bidders with boiler demolition experience
B		Management, Engineering, Administrative	1	LS	\$739,000	\$ 2,959,546	\$ 2,220,546	Contractor bid had more cost accounted for in GC than what was planned, budget had GC broke into individual lines below
C		Site Work (i.e. Fencing / Delineation of Work Areas, Erosion	1	LS	\$54,000	\$ 235,000	\$ 181,000	Escalation, bid price came back higher than budgeted
		Subtotal for General Conditions Costs			\$904,000	\$ 3,814,546	\$ 2,910,546	
	2	Utility Isolation & Temporary Construction						
D		Utility Isolations & Cut and Capping	1	LS	\$34,000	\$ 124,313	\$ 90,313	Escalation, challenges due to previous owner's drawing accuracy
		Subtotal for Utility Isolation Costs			\$34,000	\$ 124,313	\$ 90,313	
	3	Environmental						
E		Universal & Regulated Waste Removal	1	LS	\$510,000	\$ 1,965,630	\$ 1,455,630	Escalation, bid price came back higher than budgeted, ash removal from pervious owner dumping outside of regulated storage facility
F		Lead Based Paint Removal on Steel Stacks	1	LS	\$1,167,000	\$ -	\$ (1,167,000)	Was not needed due to methods used to remove stack
G		Main Plant Asbestos Removal	1	LS	\$3,679,000	\$ 4,944,625	\$ 1,265,625	Escalation, bid price came back higher than budgeted, found additional material when opening areas previously inaccessible when plant was operational.
H		Remove 16" of Coal & Replace with 3" Soil and Grass	1	LS	\$1,694,000	\$ 6,030,143	\$ 4,336,143	Bid Price was higher than budget, found coal extended past the foot print of the coal pile
		Subtotal for Environmental Costs			\$7,050,000	\$ 12,940,398	\$ 5,890,398	
	4	Demolition						
I		Miscellaneous Outbuilding Demo to Grade	1	LS	\$675,000	\$ 1,010,000	\$ 335,000	escalation and bid price came back higher than estimated
J		Main Plant Demo to Grade	1	LS	\$4,648,000	\$ 4,700,000	\$ 52,000	escalation
K		Stack & Concrete Silo Demo to Grade	1	LS	\$114,300	\$ 160,000	\$ 45,700	escalation
L		Main Plant & Outbuildings Slab and Foundation Demo	1	LS	\$620,099	\$ 2,047,000	\$ 1,426,901	Other areas where rolled into this line item. Foundation removal came back higher than budgeted
M		Stack & Concrete Silo Foundation Demo	1	LS	\$46,800	\$ -	\$ (46,800)	Included in Main Plant & Outbuilding slab and foundation demo
N		Scrap Prep & Transport Cost	1	LS	\$264,800	\$ -	\$ (264,800)	Included in Scrap value
		Subtotal for Demolition Costs			\$6,368,999	\$ 7,917,000	\$ 1,548,001	
	5	Water Intake & Discharge						
O		System Closure (Capping & Sealing Lines)	1	LS	\$92,000	\$ 1,210,000	\$ 1,118,000	Original plan did not include flow filling circ waterline, added due to prevent safety concern as lines degrade over time.
		Subtotal for Intake & Discharge Costs			\$92,000	\$ 1,210,000	\$ 1,118,000	
	6	Site Work						
P		Paving Removals	1	LS	\$67,000	\$ -	\$ (67,000)	Included in Main Plant & Outbuilding Slab and foundation Demo
Q		Process & Crush Concrete	1	LS	\$372,000	\$ -	\$ (372,000)	Included in Main Plant & Outbuilding Slab and foundation Demo
R		Backfill & Rough Grading	1	LS	\$268,000	\$ 623,325	\$ 355,325	Escalation and Included final site grading
		Subtotal for Site Restoration Costs			\$707,000	\$ 623,325	\$ (83,675)	
		TOTAL DIRECT COSTS			\$15,155,999	\$ 26,629,582	\$ 11,473,583	
	7	Indirect Costs						
S		Engineering / Permitting Support / Construction	1	LS	\$1,817,000	\$ 1,898,011	\$ 81,011	Escalation
T		Bonds / Insurance	1	LS	\$303,000	\$ 251,544	\$ (51,456)	Came in under budget
U		Contingency (10%)	1	LS	\$1,502,000	\$ 1,659,294	\$ 157,294	Increase due to project increase from escalation, Line by line contingency used instead of 10% of total project
		TOTAL INDIRECT COSTS			\$3,622,000	\$ 3,808,849	\$ 186,849	
		TOTAL DIRECT AND INDIRECT COSTS			\$18,777,999	\$ 30,438,430	\$ 11,660,431	
	8	Scrap & Equipment Sales						
V		Ferrous Metals (Prepared)	7,200	GTONS	(\$1,067,000)	\$ (5,556,785)	\$ (4,489,785)	All Scrap in a single line, Scape value higher than budgeted
W		Non-Ferrous Metals	1,045,300	POUNDS	(\$1,246,000)	\$ -	\$ 1,246,000	
		Subtotal for all Sales			(\$2,313,000)	\$ (5,556,785)	\$ (3,243,785)	
		TOTAL NET COST			\$16,464,999	\$ 24,881,645	\$ 8,416,646	
	9	Owner/Client Costs						
X		Part-Time Onsite Management	16	MONTHS	\$198,000	\$ 487,250	\$ 289,250	Project delay increased the amount of time needed for Onsite management
		GRAND TOTAL COSTS (Including Owner)			\$16,662,999	\$ 25,368,896	\$ 8,705,897	
						\$ -	Che \$ 8,705,896.80	
						\$ 25,368,895.80	Minus Coal/Ash \$ 21,223,593.22	
		Estimate Level +/- 20%						
		High	\$19,995,598.80		\$ 5,373,297.00	\$ 1,227,994.42		
		Low	\$13,330,399.20		\$ 12,038,496.60	\$ 7,893,194.02		
		Escalation (2021-2023)	0.168					
			\$19,462,382.83		\$ 5,906,512.96	\$ 1,761,210.38		
		Combined						
		High	\$23,354,859.40		\$ 2,014,036.40	\$ (2,131,266.18)		
		Low	\$15,569,906.27		\$ 9,798,989.53	\$ 5,653,686.95		

		Details					
Complete		Project Description THEC Decom Project Project # 112047				Value	Code
		PO#	Committed	Variance	Budget		
Blank							
Titles		Removal - W/0 #2604150					
Titles		MP Labor					
Blank							
Blank							
Blank							
Titles		MP Labor Total	\$ -	\$ -	\$ -		
Blank							
Blank		MP Engineering - 5101					
Blank		MP Engineering - 5102		0			
Blank		MP Engineering - 5104		0			
Blank				0			
No		Salaries, 1100 1200, 1400		0			
No		1100			\$ 307,126.28	\$ 307,126.28	X
No		1200			\$ 54,576.35	\$ 54,576.35	X
No		1400			\$ 7,018.04	\$ 7,018.04	X
Blank							
No		Expenses					
No		1510			\$ 904.24	\$ 904.24	X
No		2110		0	\$ 3,983.20	\$ 3,983.20	X
No		2210			\$ 26,229.11	\$ 26,229.11	X
No		2600			\$ 8,656.69	\$ 8,656.69	X
No							
Titles		MP Engineering Total	\$ -	\$ -	\$ 408,493.91		
Blank							
Titles		Contract					
Blank							
Titles		2019 - Asbestos Damage removal					
Yes		Lakehead - 5109 O&M agreement	\$ 38,307.07	0	\$ 38,307.07	\$ 38,307.07	G
Yes		ACCT 5311164390	\$ 57,750.88	0	\$ 57,750.88	\$ 57,750.88	G
Yes		Environmental Trouble Shooters 5311164392	\$ 18,325.00	0	\$ 18,325.00	\$ 18,325.00	G
Yes							
Yes							
Titles		Ash Cell Closure					
Yes		Barr Engineering - Closure Report 5311201433	\$ 2,539.13		\$ 2,539.13	\$ 2,539.13	E
Yes							
Titles		2023 - Asbestos Damage Removal					
Yes		ACCT 5311206675	\$ 35,000.00		\$ 32,406.47	\$ 32,406.47	G
Yes		Environmental Trouble Shooters CPA	\$ 5,240.17		\$ 4,835.23	\$ 4,835.23	G
Yes							
Blank							
Titles		2024/25 - Plant Decommissioning/Demo					
Blank							
Titles		Indirect costs					
Yes		B&M Engineering 5311205795	\$ 247,100.00		\$ 247,100.00	\$ 247,100.00	S
Yes		Resolute - Spec review 5311206684	\$ 35,194.23		\$ 35,194.23	\$ 35,194.23	S
No		Resolute - Onsite support 5311216488	\$ 387,500.00		\$ 387,500.00	\$ 387,500.00	S
Yes		Document Disposal - Paper Storm 5311212088	\$ 777.41		\$ 777.41	\$ 777.41	E
Yes		Office File Support - Lakehead 5311213284	\$ 1,566.36		\$ 1,566.36	\$ 1,566.36	E
No		Phase I - HI Situ 5311214459	\$ 9,103.50		\$ 9,103.50	\$ 9,103.50	S
No		BARR Engineering 5311211044	\$ 16,354.31		\$ 16,354.31	\$ 16,354.31	S
		BARR Engineering - Final Report 5311221757	\$ 15,000.00		\$ 15,000.00	\$ 15,000.00	S
No		Historic Building - HessRoise 5311214460	\$ 17,980.00		\$ 17,980.00	\$ 17,980.00	S
		DOCUMENTARY PHOTOGRAPHY - HessRoise 5311219000	\$ 14,378.50		\$ 14,378.50	\$ 14,378.50	S
No		B&M Management, Engineering, Administrative 5311217662	\$ 1,080,400.00		\$ 1,080,400.00	\$ 1,080,400.00	S
No		Site Permit Fees			\$ 75,000.00	\$ 75,000.00	S
No		3rd Party Air Monitoring - Jensen 5311219040	\$ 168,000.00		\$ 168,000.00	\$ 168,000.00	G
Blank		TM automation 5311222051	\$ 946.00		\$ 946.00	\$ 946.00	D
Titles		Demolition Contract IX 2			\$ 12,979,683.70		
Titles		1.0 General Conditions 5311217059					
No		Mobilization	\$ 520,000.00			\$ 520,000.00	A
No		Demobilization	\$ 100,000.00			\$ 100,000.00	A
No		General Conditions	\$ 2,500,000.00			\$ 2,500,000.00	B
No		Performance bond	\$ 57,544.00			\$ 57,544.00	T
Blank			\$ -				
Titles		2.0 Site Preperation	\$ -				
No		Verify Utility Isolation	\$ 20,000.00			\$ 20,000.00	D
No		Temporary fencing and other barricades	\$ 75,000.00			\$ 75,000.00	C
No		Install and maintain temporary electric and water for asbestos abatement and demolition activities	\$ 45,000.00			\$ 45,000.00	C
No		.Install, inspect and maintain stormwater controls during project (structural controls and documentation)	\$ 65,000.00			\$ 65,000.00	C
No		Install and maintain water for dust control activities.	\$ 50,000.00			\$ 50,000.00	C
Blank			\$ -			\$ -	
Titles		3.0 Structural Demolition	\$ -			\$ -	
No		Coal Yard Structures (including reclaim hoppers, tunnels, and associated below grade concrete removal)	\$ 100,000.00			\$ 100,000.00	I
No		Railroad Track Removal	\$ 25,000.00			\$ 25,000.00	I
No		Coal Handling System (including conveyor up to powerblock, transfer houses, emergency dump)	\$ 340,000.00			\$ 340,000.00	I
No		Storage House and Fuel Oil System	\$ 15,000.00			\$ 15,000.00	I
No		Warehouses and miscellaneous outbuildings	\$ 55,000.00			\$ 55,000.00	I
No		Units 1-3 Stack demolition	\$ 160,000.00			\$ 160,000.00	K
No		Units 1, 2, & 3 Boilers	\$ 3,250,000.00			\$ 3,250,000.00	J
No		Units 1, 2, & 3 Turbine	\$ 1,450,000.00			\$ 1,450,000.00	J
No		Adminstration Building	\$ 60,000.00			\$ 60,000.00	I
No		Sewage Treatment Plant and Septic Field	\$ 97,000.00			\$ 97,000.00	I
No		Screenhouse	\$ 115,000.00			\$ 115,000.00	I
No		FSI Building	\$ 60,000.00			\$ 60,000.00	I
No		Substation	\$ 85,000.00			\$ 85,000.00	I
No		Water Treatment Building	\$ 35,000.00			\$ 35,000.00	I
No		Retaining Wall Demolition (including earth stabilization)					
Blank							
Titles		4.0 Demolition and/or Abandoment of below grade					
No		Removal of Power block and ancillary building foundations	\$ 1,479,000.00			\$ 1,479,000.00	L
No		Backfill of power block and ancillary building foundations	\$ 158,000.00			\$ 158,000.00	L
No		Demolish circulating water pipes to 2 feet BGS in the Main Power Block footprint. Flow fill circulating pipes from Main power block to Screenhouse	\$ 410,000.00			\$ 410,000.00	L
No		Backfill of Units 1-3 circulating water intake and discharge lines from Main Power Block to the Screenhouse per Site Grading Plan.	\$ 130,000.00			\$ 130,000.00	O
No		Abandon circulating discharge tunnel with CLSM. Bulkhead at wingwall	\$ 660,000.00			\$ 660,000.00	O
No		Bulkhead circulating water intake lines at Screenhouse. Circulating water intake piping and the concrete anchor to be abandoned in place	\$ 385,000.00			\$ 385,000.00	O
No		Demolition of pits associated with the Screenhouse (incl the Control Room and Fire Pump Pit) to 2ft BGS. Remove equipment and appurtenances	\$ 35,000.00			\$ 35,000.00	O
No		Backfill of Screenhouse Pits per Site Grading Plan	\$ 75,000.00			\$ 75,000.00	R
No		Demolition of Sewage Treatment Plant pits and below grade tanks to 2 feet BGS	\$ 23,000.00			\$ 23,000.00	I
No		Backfill of Sewage Treatment Plant per Site Grading Plan	\$ 22,000.00			\$ 22,000.00	R
Blank							
Titles		5.0 Site Restoration					
		Page 1 of 2				12/2/20242:27 PM	

Details									
No	Backfill and compact all voids in the coal yard per Site Grading Plan		\$ 65,000.00			\$ 65,000.00	R		
No	Backfill and compact all voids in the Coal Handling system per site grading plan		\$ 39,139.70			\$ 39,139.70	R		
No	Backfill and compact all voids in the Main Plant per site grading plan		\$ 73,000.00			\$ 73,000.00	R		
Blank						\$ -			
Titles	6.0 Environmental Costs					\$ -			
No	Removal of universal waste (batteries, light ballast, mercury devices, e-waste, etc.)		\$ 165,000.00			\$ 165,000.00	E		
No	Removal of regulated waste (fire extinguishers, refrigerants, nuclear devices, etc.)		\$ 798,000.00			\$ 798,000.00	E		
No	Abatement of transite electrical ductwork from main power block to the substation.		\$ 150,000.00			\$ 150,000.00	G		
No	Abatement of asbestos-containing materials in Main Power Block		\$ 4,350,000.00			\$ 4,350,000.00	G		
No	Abatement of asbestos-containing materials in Outbuildings and Coal Handling structures		\$ 125,000.00			\$ 125,000.00	G		
Blank									
Titles	7.0 Residual Coal Removal and Remediation								
No	Remove residual coal/soil in the Coal Yard, transport and dispose in approved landfill		\$ 12,000.00			\$ 12,000.00	H		
Blank						\$ -			
Titles	ALLOWANCE Pricing					\$ -			
No	20.01 Abate - Unit 3 cable room					\$ -			
No	20.02 - Abate screenhouse electrical tunnel conduit					\$ -			
No	20.03 - Abate Substation electrical tunnel conduit					\$ -			
No	20.04 Abate - rail loadout transfer house siding					\$ -			
No	20.05 Abate - Pipe under cliffs conveyor					\$ -			
No	20.06 Abate - Unit 1 boiler refractory					\$ -			
No	20.07 Abate - Unit 2 boiler refractory					\$ -			
No	20.08 Abate - Unit 3 boiler refractory					\$ -			
No	20.09 - Section 39 – Hindrances and Delays					\$ -			
Blank						\$ -			
Titles	DEMOLITION & SITE WORK ALTERNATE PRICING					\$ -			
No	21.01 Flow fill CW inlete pipes with CLSM	5311217059				\$ -			
No	21.02-Additional-Cost-to-remove-Cliffs-equipment	5311217059	\$ -			\$ -			
Blank						\$ -			
Titles	Credit (Scrap and Asset sale)					\$ -			
No	Scrap	5311217059	\$ (5,454,000.00)			\$ (5,454,000.00)	V		
No	Asset Credit	5311217059	\$ -			\$ -			
Blank									
Blank									
Titles	Contract total								
Blank									
Blank									
Titles	Utility Isolation								
No	Site Mechanical Utility Isolation - HUNT				\$ 80,000.00	\$ 80,000.00	D		
Yes	Decommission Fire System	5311217855	\$ 2,400.00		\$ 2,400.00	\$ 2,400.00	D		
Yes	Elevator - Otis	5311220799	\$ 8,967.30		\$ 8,967.30	\$ 8,967.30	D		
No									
Blank									
Titles	Site Restoration - Final Grading								
No	SWPPP perimeter controls				\$ 36,100.00	\$ 36,100.00	R		
No	Sub station - mass earthwork				\$ 166,000.00	\$ 166,000.00	R		
No	Plant mass earth work				\$ 37,700.00	\$ 37,700.00	R		
No	Hydroseed Disturbed Areas				\$ 109,385.00	\$ 109,385.00	R		
Blank									
No	Surface soil sampling				\$ 100,000.00	\$ 100,000.00	E		
Blank									
Titles	Coal Yard/Sedimentation Pond Closure								
Yes	Excavate & Dispose of Residual coal (topsoil/seed)								
Titles	2023 - Coal Pile Closure								
Yes	B&M Engineering	5311196495	\$ 155,000.00		\$ 155,000.00	\$ 155,000.00	H		
Yes	THEC Pile Site Investigation - Braun	5311200024	\$ 14,387.80		\$ 14,387.80	\$ 14,387.80	H		
Yes	Civil Construction - Ulland		\$ 2,599,345.00		\$ 6,670,517.58	\$ 5,772,770.61	H		
Yes	CO-001		\$ 822,738.00		\$ -				
Yes	CO-002		\$ 1,043,998.85		\$ -				
Yes	CO-003		\$ 734,977.86		\$ -				
Yes	CO-004		\$ 571,710.90						
Yes	CO-005 (CCR)		\$ 897,746.97			\$ 897,746.97	E		
Titles	Pond Water Hauling/Disposal								
Yes	G&G		\$ 66,535.05		\$ 66,535.05	\$ 66,535.05	H		
Yes	Grand Marias		\$ 9,450.00		\$ 9,450.00	\$ 9,450.00	H		
Titles	MP Salvage Credit								
Yes	Fuel Tanks - Edwards Oil	Bill of sale	\$ (8,225.00)		\$ (8,225.00)	\$ (8,225.00)	V		
Yes	Asset Sales	Bill of sale	\$ (94,560.00)		\$ (94,560.00)	\$ (94,560.00)	V		
Blank									
Blank									
No	Accruals								
No									
Titles	Contract Total		\$21,955,618.99	\$ -	\$ 22,556,805.52				
Titles	Stores								
No	Stores Issues 5110				\$ 2,000.00	\$ 2,000.00	D		
Blank									
Titles	Stores Total		\$ -	\$ -	\$ 2,000.00				
Titles	Materials								
No	misc			0	\$ 5,000.00	\$ 10,000.00	D		
Blank									
Titles	Total Materials		\$ -	\$ -	\$ 5,000.00				
Titles	Lease/Rental Total								
Blank									
Titles	Lease/Rental Total		\$ -	\$ -	\$ -				
Titles	Removal Total		\$21,955,618.99	\$ -	\$ 22,977,299.43				
No	Contingency				\$ 1,659,293.97	\$ 1,659,293.97	U		
No	Allowance			\$ 389,750.00					
No	Alternate			\$ 800,000.00					
No	AFDC Charges				\$ -				
No	Administrative & General	2%			\$ 459,545.99	\$ 459,545.99	B		
No	4800 Permitting/Notifications				\$ 4,975.00	\$ 4,975.00	X		
No	Internal Labor Overheads				\$ 73,781.40	\$ 73,781.40	X		
No	Shipping				\$ -				
No	Insurance				\$ 194,000.00	\$ 194,000.00	T		
Blank									
Titles	Project # Total		\$21,955,618.99	\$ -	\$ 25,368,895.80				
No									
No									
No	Side Notes:					Remaining	\$25,368,895.80		

Copy from Monthly IX billing sheet

APPLICATION AND CERTIFICATE FOR PAYMENT AIA DOCUMENT G702

PAGE TWO OF TWO PAGES

AIA Document G702, APPLICATION AND CERTIFICATE FOR PAYMENT,
containing Contractor's signed Certification, is attached.
In tabulations below, amounts are stated to the nearest dollar.
Use Column I on Contracts where variable rate retainage for line items may apply.

A	B	C				D	E	F	G		H	I
Phase NO.	DESCRIPTION OF WORK	UNIT QUANTITY	UNIT OF MEASURE	UNIT PRICE	SCHEDULED VALUE	WORK COMPLETED		MATERIALS PRESENTLY STORED	TOTAL COMPLETED & STORED TO DATE (D + E + F)	% (G / C)	BALANCE TO FINISH (C - G)	RETAINAGE (IF VARIABLE RATE) \$ 0.10
						FROM PREVIOUS APPLICATION (D + E)	THIS PERIOD (NOT IN D OR THIS PERIOD)					
						1.0 GENERAL CONDITIONS AND MOBILIZATION						
1.01	Mobilization	1	LS	\$ 520,000.00	\$ 520,000.00	\$ 150,000.00	\$ 25,000.00	\$ -	\$ 175,000.00	33.65%	\$ 345,000.00	\$ 17,500.00
1.02	Demobilization	1	LS	\$ 100,000.00	\$ 100,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 100,000.00	\$ -
1.03	General Conditions	1	LS	\$ 2,500,000.00	\$ 2,500,000.00	\$ 220,000.00	\$ 110,000.00	\$ -	\$ 330,000.00	13.20%	\$ 2,170,000.00	\$ 33,000.00
BOND	Performance & Payment Bond	1	LS	\$ 57,544.00	\$ 57,544.00	\$ 57,544.00	\$ -	\$ -	\$ 57,544.00	100.00%	\$ -	\$ 5,754.40
2.0 SITE PREPARATION												
2.01	Verify Utility Isolation	1	LS	\$ 20,000.00	\$ 20,000.00	\$ 2,500.00	\$ 2,500.00	\$ -	\$ 5,000.00	25.00%	\$ 15,000.00	\$ 500.00
2.02	Temporary Fencing and Other Barricades	1	LS	\$ 75,000.00	\$ 75,000.00	\$ -	\$ 10,000.00	\$ -	\$ 10,000.00	13.33%	\$ 65,000.00	\$ 1,000.00
2.03	Install and Maintain Temporary Electric and Water for Asbestos Abatement and Demolition Activities	1	LS	\$ 45,000.00	\$ 45,000.00	\$ -	\$ 5,000.00	\$ -	\$ 5,000.00	11.11%	\$ 40,000.00	\$ 500.00
2.04	Install, Inspect and Maintain Stormwater Controls During Project	1	LS	\$ 65,000.00	\$ 65,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 65,000.00	\$ -
2.05	Install and maintain water for dust control activities	1	LS	\$ 50,000.00	\$ 50,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 50,000.00	\$ -
3.0 STRUCTURAL DEMOLITION												
3.01	Coal Yard Structures (incl. reclaim hoppers, tunnels, and assoc. below grade concrete removal)	1	LS	\$ 100,000.00	\$ 100,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 100,000.00	\$ -
3.02	Railroad Track Removal	1	LS	\$ 25,000.00	\$ 25,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 25,000.00	\$ -
3.03	Coal Handling System (incl conveyor up to powerblock, transfer houses, emergency dump)	1	LS	\$ 340,000.00	\$ 340,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 340,000.00	\$ -
3.04	Storage House and Fuel Oil System	1	LS	\$ 15,000.00	\$ 15,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 15,000.00	\$ -
3.05	Warehouse and Misc Outbuildings	1	LS	\$ 55,000.00	\$ 55,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 55,000.00	\$ -
3.06	Units 1-3 Stack Demolition	1	LS	\$ 160,000.00	\$ 160,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 160,000.00	\$ -
3.07	Units 1-3 Boilers	1	LS	\$ 3,250,000.00	\$ 3,250,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 3,250,000.00	\$ -
3.08	Units 1-3 Turbine	1	LS	\$ 1,450,000.00	\$ 1,450,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 1,450,000.00	\$ -
3.09	Administration Building	1	LS	\$ 60,000.00	\$ 60,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 60,000.00	\$ -
3.10	Sewage Treatment Plant and Septic Field	1	LS	\$ 97,000.00	\$ 97,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 97,000.00	\$ -
3.11	Screenhouse	1	LS	\$ 115,000.00	\$ 115,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 115,000.00	\$ -
3.12	FSI Building	1	LS	\$ 60,000.00	\$ 60,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 60,000.00	\$ -
3.13	Substation	1	LS	\$ 85,000.00	\$ 85,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 85,000.00	\$ -
3.14	Water Treatment Building	1	LS	\$ 35,000.00	\$ 35,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 35,000.00	\$ -
4.0 DEMOLITION AND/OR ABANDONMENT OF BELOW GRADE STRUCTURES AND PIPES												
4.01	Removal of Power block and ancillary building foundations	1	LS	\$ 1,479,000.00	\$ 1,479,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 1,479,000.00	\$ -
4.02	Backfill of power block and ancillary building foundations	1	LS	\$ 158,000.00	\$ 158,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 158,000.00	\$ -
4.03	Demolish circulating water pipes to 2 feet BGS in the Main Power Block footprint. Flow fill circulating pipes from Main power block to Screenhouse	1	LS	\$ 410,000.00	\$ 410,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 410,000.00	\$ -
4.04	Backfill of Units 1-3 circulating water intake and discharge lines from Main Power Block to the Screenhouse per Site Grading Plan.	1	LS	\$ 130,000.00	\$ 130,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 130,000.00	\$ -
4.05	Abandon circulating discharge tunnel with CLSM. Bulkhead at wingwall	1	LS	\$ 660,000.00	\$ 660,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 660,000.00	\$ -
4.06	Bulkhead circulating water intake lines at Screenhouse. Circulating water intake piping and the concrete anchor to be abandoned in place	1	LS	\$ 385,000.00	\$ 385,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 385,000.00	\$ -

A	B	C				D	E	F	G		H	I
Phase NO.	DESCRIPTION OF WORK	UNIT QUANTITY	UNIT OF MEASURE	UNIT PRICE	SCHEDULED VALUE	WORK COMPLETED		MATERIALS PRESENTLY STORED	TOTAL COMPLETED & STORED TO DATE (D + E + F)	% (G / C)	BALANCE TO FINISH (C - G)	RETAINAGE (IF VARIABLE RATE) \$ 0.10
						FROM PREVIOUS APPLICATION (D + E)	THIS PERIOD (NOT IN D OR					
4.07	Demolition of pits associated with the Screenhouse (incl the Control Room and Fire Pump Pit) to 2ft BGS. Remove equipment and appurtenances	1	LS	\$ 35,000.00	\$ 35,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 35,000.00	\$ -
4.08	Backfill of Screenhouse Pits per Site Grading Plan	1	LS	\$ 75,000.00	\$ 75,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 75,000.00	\$ -
4.09	Demolition of Sewage Treatment Plant pits and below grade tanks to 2 feet BGS	1	LS	\$ 23,000.00	\$ 23,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 23,000.00	\$ -
4.10	Backfill of Sewage Treatment Plant per Site Grading Plan	1	LS	\$ 22,000.00	\$ 22,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 22,000.00	\$ -
5.0 SITE RESTORATION (MASONRY, BACKFILL AND FINAL SITE GRADING)												
5.01	Backfill and Compact all voids in the coal yard per Site Grading Plan	1	LS	\$ 65,000.00	\$ 65,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 65,000.00	\$ -
5.02	Backfill and compact all voids in the Coal Handling System per Site Grading Plan	1	LS	\$ 39,139.70	\$ 39,139.70	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 39,139.70	\$ -
5.03	Backfill and compact all voids in the Main Plant per Site Grading Plan	1	LS	\$ 73,000.00	\$ 73,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 73,000.00	\$ -
6.0 REGULATED, UNIVERSAL AND SPECIAL WASTE (INCLUDES WASTE TRANSPORT AND DISPOSAL)												
6.01	Removal of Universal Waste (Batteries, light ballast, mercury devices, e-waste, etc)	1	LS	\$ 165,000.00	\$ 165,000.00	\$ 33,000.00	\$ 123,750.00	\$ -	\$ 156,750.00	95.00%	\$ 8,250.00	\$ 15,675.00
6.02	Removal of regulated waste (fire extinguishers, refrigerants, nuclear devices, etc)	1	LS	\$ 798,000.00	\$ 798,000.00	\$ 159,600.00	\$ 438,900.00	\$ -	\$ 598,500.00	75.00%	\$ 199,500.00	\$ 59,850.00
6.03	Abatement of transite electrical ductwork from main powerblock to the substation	1	LS	\$ 150,000.00	\$ 150,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 150,000.00	\$ -
6.04	Abatement of asbestos-containing materials in Main Power Block	1	LS	\$ 4,350,000.00	\$ 4,350,000.00	\$ 522,000.00	\$ 500,250.00	\$ -	\$ 1,022,250.00	23.50%	\$ 3,327,750.00	\$ 102,225.00
6.05	Abatement of asbestos-containing materials in Outbuildings and Coal handling structures	1	LS	\$ 125,000.00	\$ 125,000.00	\$ 81,250.00	\$ 37,500.00	\$ -	\$ 118,750.00	95.00%	\$ 6,250.00	\$ 11,875.00
7.0 RESIDUAL COAL REMOVAL AND REMEDIATION												
7.01	Remove residual coal/soil in the coal yard, transport and dispose in approved landfill	1	LS	\$ 12,000.00	\$ 12,000.00	\$ -	\$ -	\$ -	\$ -	0.00%	\$ 12,000.00	\$ -
SCRAP & ASSET SALES CREDIT												
SCRAP	Scrap Sales Credit	1	LS	\$ (5,454,000.00)	\$ (5,454,000.00)	\$ -	\$ -	\$ -	\$ -	0.00%	\$ (5,454,000.00)	\$ -
ALTERNATES												
CHANGE ORDERS												
TOTAL					\$ 12,979,683.70	\$ 1,225,894.00	\$ 1,252,900.00	\$ -	\$ 2,478,794.00	19.10%	\$ 10,500,889.70	\$ 247,879.40
AIA DOCUMENT G703 - CONTINUATION SHEET FOR G702 -1992 Edition						G703-1992						

Monthly Actuals

Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25
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\$ -	\$ 100,000.00	\$ 50,000.00	\$ 25,000.00
\$ -	\$ -	\$ -	\$ -
\$ -	\$ 110,000.00	\$ 110,000.00	\$ 110,000.00
\$ 57,544.00	\$ 57,544.00	\$ -	\$ -

\$ -	\$ -	\$ 2,500.00	\$ 2,500.00
\$ -	\$ -	\$ -	\$ 10,000.00
\$ -	\$ -	\$ -	\$ 5,000.00
\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -

[illegible]

\$ -	\$ -	\$ -	\$ -
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Monthly Actuals

[illegible]

\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -
\$ -	\$ -	\$ -	\$ -

\$ -	\$ -	\$ 33,000.00	\$ 123,750.00
\$ -	\$ -	\$ 159,600.00	\$ 438,900.00
\$ -	\$ -	\$ -	\$ -
\$ -	\$ 125,000.00	\$ 397,000.00	\$ 500,250.00
\$ -	\$ 31,200.00	\$ 50,050.00	\$ 37,500.00

\$ -	\$ -	\$ -	\$ -
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\$ -	\$ -	\$ -	\$ -
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[illegible]

Bid Breakdown

Minnesota Power Taconite Harbor Energy Center															
BID BREAKDOWN - Base Bid															
INSTRUCTIONS - Bidder to fill in white cells. All prices shown are lump sum unless otherwise noted. Note: Line Items Costs and Quantities shall be entered where shown															
Bidder Name:		Bierlein		Base Case 1 Bradenburg		Base Case 2 Bradenburg		IX		IX		Base Case 1 Rachel		Base Case 2 Rachel	
Item	Description	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)	Value (US Dollars)
I. DEMOLITION SERVICES															
1.0 GENERAL CONDITIONS AND MOBILIZATION		Extended Price		Extended Price		Extended Price		Extended Price		Extended Price		Extended Price		Extended Price	
1.01	Mobilization							\$ 500,000.00		\$ 500,000.00					
1.02	Demobilization							\$ 100,000.00		\$ 100,000.00					
1.03	General Conditions (Division 01)							\$ 2,615,000.00		\$ 2,615,000.00					
TOTAL - ITEM 1.0:								\$ 3,215,000.00		\$ 3,215,000.00					
2.0 SITE PREPARATION															
2.01	Verify utility isolation							\$ 13,995.68		\$ 13,995.68					
2.02	Temporary fencing and other barricades							\$ 72,379.05		\$ 72,379.05					
2.03	Install and maintain temporary electric and water for asbestos abatement and demolition activities							\$ 51,500.00		\$ 51,500.00					
2.04	Install, inspect and maintain stormwater controls during project (structural controls and documentation)							\$ 71,432.72		\$ 71,432.72					
2.05	Install and maintain water for dust control activities.							\$ 55,982.72		\$ 55,982.72					
TOTAL - ITEM 2.0:								\$ 265,290.17		\$ 265,290.17					
3.0 STRUCTURAL DEMOLITION															
3.01	Coal Yard Structures (including reclaim hoppers, tunnels, and associated below grade concrete removal)							\$ 99,336.00		\$ 99,336.00					
3.02	Railroad Track Removal							\$ 24,028.40		\$ 24,028.40					
3.03	Coal Handling System (including conveyor up to powerblock, transfer houses, emergency dump)							\$ 330,115.50		\$ 330,115.50					
3.04	Storage House and Fuel Oil System							\$ 9,901.80		\$ 9,901.80					
3.05	Warehouses and miscellaneous outbuildings							\$ 51,309.40		\$ 51,309.40					
3.06	Units 1-3 Stack demolition							\$ 152,002.80		\$ 152,002.80					
3.07	Units 1, 2, & 3 Boilers							\$ 3,220,778.00		\$ 3,220,778.00					
3.08	Units 1, 2, & 3 Turbine							\$ 1,394,344.00		\$ 1,394,344.00					
3.09	Administration Building							\$ 58,343.00		\$ 58,343.00					
3.10	Sewage Treatment Plant and Septic Field							\$ 95,853.00		\$ 95,853.00					
3.11	Screenhouse							\$ 111,903.00		\$ 111,903.00					
3.12	FSI Building							\$ 58,420.00		\$ 58,420.00					
3.13	Substation							\$ 80,475.00		\$ 80,475.00					
3.14	Water Treatment Building							\$ 30,015.00		\$ 30,015.00					
3.15	Retaining Wall Demolition (including earth stabilization)							\$167,000.00							
TOTAL - ITEM 3.0:								\$5,883,824.90		\$5,716,824.90					
4.0 DEMOLITION AND/OR ABANDONMENT OF BELOW GRADE STRUCTURES AND PIPES		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume	
4.01	Removal of power block and ancillary building foundations							\$ 1,498,450.40		\$ 1,498,450.40					
4.02	Backfill of power block and ancillary building foundations							\$ 159,477.40		\$ 159,477.40	25,000				
4.03	Removal of Unit 1, 2, 3 circulating water intake and discharge lines from the Main Power Block to the Screenhouse.							\$ 184,418.00		\$ 415,000.00					
4.04	Backfill of Units 1-3 circulating water intake and discharge lines from Main Power Block to the Screenhouse per Site Grading Plan.							\$ 132,884.00		\$ 132,884.00	19,000				
4.05	Removal of circulating water discharge channel.							\$ 1,140,000.00		\$ 660,000.00					
4.06	Backfill of circulating water discharge channel.							\$ 132,800.00		\$ 390,000.00	8,000				
4.07	Removal of circulating water intake pipes and associated concrete anchor.							\$ 2,173,300.00							
4.08	Restoration of shoreline to match adjacent area.							\$ 58,871.81							
4.09	Demolition of pits associated with the Screenhouse (including the Control Room and Fire Pump Pit).							\$ 150,886.90		\$ 35,000.00					
4.10	Backfill of Screenhouse pits per Site Grading Plan.							\$ 79,680.00		\$ 79,680.00	23,000				
4.11	Demolition of Sewage Treatment Plant pits and below ground tanks							\$ 46,138.20		\$ 27,000.00					
4.12	Backfill of Sewage Treatment Plant per Site Grading Plan.							\$ 26,568.00		\$ 26,568.00					
TOTAL - ITEM 4.0:								\$ 5,783,474.71		\$ 3,424,059.80					
5.0 SITE RESTORATION (MASONRY, BACKFILL AND FINAL SITE GRADING)		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume		Est. Fill Volume	
5.01	Backfill and compact all voids in the coal yard per Site Grading Plan							\$ 66,415.95		\$ 66,415.95					
5.02	Backfill and compact all voids in the Coal Handling system per site grading plan							\$ 43,483.80		\$ 43,483.80					
5.03	Backfill and compact all voids in the Main Plant per site grading plan							\$ 74,589.00		\$ 74,589.00					
TOTAL - ITEM 5.0:								\$ 184,488.75		\$ 184,488.75					
DEMOLITION SERVICES: TOTAL ITEMS 1 thru 5								\$ 15,332,078.53		\$ 12,805,663.62					
II. ENVIRONMENTAL ABATEMENT															
6.0 REGULATED, UNIVERSAL and SPECIAL WASTE (includes waste transport and disposal)															
6.01	Removal of universal waste (batteries, light ballast, mercury devices, e-waste, etc.)							\$ 159,650.00		\$ 159,650.00					
6.02	Removal of regulated waste (fire extinguishers, refrigerants, nuclear devices, etc.)							\$ 794,329.28		\$ 794,329.28					
6.03	Abatement of transite electrical ductwork from main power block to the substation.							\$ 147,290.00		\$ 147,290.00					
6.04	Abatement of asbestos-containing materials in Main Power Block							\$ 4,315,638.20		\$ 4,315,638.20					
6.05	Abatement of asbestos-containing materials in Outbuildings and Coal Handling structures							\$ 119,912.60		\$ 119,912.60					
TOTAL - ITEM 6.0:								\$ 5,536,820.08		\$ 5,536,820.08					
7.0 RESIDUAL COAL REMOVAL AND REMEDIATION		Est. Cu. Yd.		Unit Price		Unit Price		Unit Price		Unit Price		Unit Price		Unit Price	
7.01	Remove residual coal/soil in the Coal Yard, transport and dispose in approved landfill	1,000	65		\$0.00			\$ -		\$ 10,200.00					
TOTAL - ITEM 7.0:								\$ -		\$ 10,200.00					
ENVIRONMENTAL ABATEMENT SERVICES: TOTAL ITEM 6 & 7								\$ 5,536,820.08		\$ 5,547,020.08					
III.															
11.0															
11.01															
11.02															
TOTAL - ITEM 11.0:			\$ -					\$ -		\$ -		\$ -			
DEMOLITION: TOTAL ITEM 11			\$ -					\$ -		\$ -		\$ -			
BASE CONTRACT PRICE (TOTAL - ALL ITEMS):								\$ 20,868,898.61		\$ 18,352,683.70					
RANK															
COST DIFFERENCE FROM LOWEST PRICE			\$ -		\$ -			\$ -		\$ -		\$ -			

Scrap Detail Credit

Bierlein					Brandenburg				IX				Rachel			
Site: Minnesota Power Taconite Harbor Energy Center																
Bidder Name: Bierlein					Brandenburg				IX				Rachel			
	Weight	Pricing			Weight	Pricing			Weight	Pricing			Weight	Pricing		
Scrap Grade	(Gross Tons / Pounds)	Per Gross Ton	Per Pound	Value (US Dollars)	(Gross Tons / Pounds)	Per Gross Ton	Per Pound	Value (US Dollars)	(Gross Tons / Pounds)	Per Gross Ton	Per Pound	Value (US Dollars)	(Gross Tons / Pounds)	Per Gross Ton	Per Pound	Value (US Dollars)
									11,000	\$ 262.00		\$ (2,882,000.00)				
									3,000	\$ 244.00		\$ (732,000.00)				
									2,000	\$ 244.00		\$ (488,000.00)				
									1,000	\$ 205.00		\$ (205,000.00)				
									1,000	\$ 210.00		\$ (210,000.00)				
									400	\$ 100.00		\$ (40,000.00)				
									600	\$ 170.00		\$ (102,000.00)				
									40	\$ 200.00		\$ (8,000.00)				
									100,000		\$ 0.40	\$ (40,000.00)				
									80,000		\$ 1.25	\$ (100,000.00)				
									150,000		\$ 1.50	\$ (225,000.00)				
									150,000		\$ 1.00	\$ (150,000.00)				
									100,000		\$ 0.90	\$ (90,000.00)				
									50,000		\$ 0.30	\$ (15,000.00)				
									80,000		\$ 0.70	\$ (56,000.00)				
									150,000		\$ 0.35	\$ (52,500.00)				
									10,000		\$ 1.00	\$ (10,000.00)				
									0		\$ 2.00	\$ -				
									100,000		\$ 0.20	\$ (20,000.00)				
									50,000		\$ 0.57	\$ (28,500.00)				
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		Bierlein		Brandenburg 1		Brandenburg 2	IX 1		IX 2	Rachel 1		Rachel 2	
D	PERFORMANCE & PAYMENT BOND COST (Based on C)												
									\$81,000.00				

CASH FLOW SCHEDULE

CASH FLOW

2/8/2024

DRAFT

Month	Invoice Month	Amount	Cumulative Amount
	Feb-24	\$ 57,544.00	\$ 57,544.00
	Mar-24	\$ 329,580.00	\$ 387,124.00
1	Apr-24	\$ 802,150.00	\$ 1,189,274.00
2	May-24	\$ 1,252,900.00	\$ 2,442,174.00
3	Jun-24	\$ 1,265,720.00	\$ 3,707,894.00
4	Jul-24	\$ 1,565,850.00	\$ 5,273,744.00
5	Aug-24	\$ 1,650,000.00	\$ 6,923,744.00
6	Sep-24	\$ 1,250,000.00	\$ 8,173,744.00
7	Oct-24	\$ 1,100,000.00	\$ 9,273,744.00
8	Nov-24	\$ 1,000,000.00	\$ 10,273,744.00
9	Dec-24	\$ 100,000.00	\$ 10,373,744.00
10	Jan-25	\$ 100,000.00	\$ 10,473,744.00
11	Feb-25	\$ 100,000.00	\$ 10,573,744.00
12	Mar-25	\$ 300,000.00	\$ 10,873,744.00
13	Apr-25	\$ 500,000.00	\$ 11,373,744.00
14	May-25	\$ 750,000.00	\$ 12,123,744.00
15	Jun-25	\$ 500,000.00	\$ 12,623,744.00
16	Jul-25	\$ 355,939.70	\$ 12,979,683.70
17	Aug-25	\$ -	\$ 12,979,683.70
18	Sep-25	\$ -	\$ 12,979,683.70
19	Oct-25	\$ -	\$ 12,979,683.70
20	Nov-25	\$ -	\$ 12,979,683.70

Total Contract Price:
\$ 12,979,683.70

This is a DRAFT cash flow schedule which will need to be finalized prior to contract execution

Month			1	2	3	4	5	6	7	8	9	10
Invoice Month	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25
Amount	\$ 57,544.00	\$ 329,580.00	\$ 802,150.00	\$ 1,252,900.00	\$ 1,265,720.00	\$ 1,565,850.00	\$ 1,650,000.00	\$ 1,250,000.00	\$ 1,100,000.00	\$ 1,000,000.00	\$ 100,000.00	\$ 100,000.00
Cumulative Amount	\$ 57,544.00	\$ 387,124.00	\$ 1,189,274.00	\$ 2,442,174.00	\$ 3,707,894.00	\$ 5,273,744.00	\$ 6,923,744.00	\$ 8,173,744.00	\$ 9,273,744.00	\$ 10,273,744.00	\$ 10,373,744.00	\$ 10,473,744.00

[illegible]

11	12	13	14	15	16	17	18	19	20
Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25
\$ 100,000.00	\$ 300,000.00	\$ 500,000.00	\$ 750,000.00	\$ 500,000.00	\$ 355,939.70	\$ -	\$ -	\$ -	\$ -
\$ 10,573,744.00	\$ 10,873,744.00	\$ 11,373,744.00	\$ 12,123,744.00	\$ 12,623,744.00	\$ 12,979,683.70	\$ 12,979,683.70	\$ 12,979,683.70	\$ 12,979,683.70	\$ 12,979,683.70

[illegible]

Cash Flow Chart

EXAMPLE

BY: Eric Sutherland

DATE: 10/14/2019

ITEM	DESCRIPTION	EQUIPMENT/ MATERIALS	T&M CONTRACTOR LABOR	MP LABOR (ELEC MECH INST OPS ENGR PLAN)	LUMP SUM LABOR & MATERIALS IF ANY
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
SUBTOTAL		\$0	\$0	\$0	\$0
TOTAL MATERIALS & INSTALL COST		\$0			

SELECT PROJECT
SPEC %

11	CONTINGENCY 5-30% <depends on accuracy level of estimate>		5%	\$0.00
OVERHEADS				
12	ENVIRONMENTAL & LEGAL (project dependent)		0%	\$0
13	TAXES (7.5% of Materials)		0.0%	\$0
14	SHIPPING (varies - % of materials)		2%	\$0.00
15	INSURANCE (PROJECT DEPENDENT)		0%	\$0
16	LAND, EASEMENTS, PERMITS		0%	\$0
17	A&G (2%)		2%	\$0
18	LABOR OVERHEADS <can be included above		0%	\$0
19	RETIREMENTS <less salvage>		0%	\$0
20	AFDUC (8%)		8%	\$0
PROJECT ESTIMATE TOTAL				\$0

complete
green
sections

	Total Budget	Delta	Delta %
Brandenburg 1			
Brandenburg 2			
IX 1			
IX 2			
Rachel 1			
Rachel 2		\$ -	#DIV/0!

Escalated 5% a year					
	Decomm Costs	Salvage	Net Decomm Costs		
2020	18,975,999.00	(2,313,000.00)	16,662,999.00		
2021	19,924,798.95	(2,428,650.00)	17,496,148.95		
2022	20,921,038.90	(2,550,082.50)	18,370,956.40	Increase	
2023	21,967,090.84	(2,677,586.63)	19,289,504.22	2,626,505.22	Actuals (Dec 2023)
2024	30,925,680.80	(5,556,785.00)	25,368,895.80	7,872,746.85	10,548,796.50 *included

Cost Drivers			
Coal Pile - Above estiamte	\$	4,677,770.61	Additional Coal
Additional Ash	\$	914,101.28	Ash removal
Demolition bid	\$	(6,368,999.00)	Higher bid price, partuioally due to additional foundation removal.
Contingency		469,543.97	
Allowanaces		389,750.00	Covers additional asbestos removal if sampled return positive
Alternate		800,000.00	If we need to remove remaining foundations
Sum		882,166.86	

Yearly Estimate

2019	\$	-	
2020	\$	123,199.89	\$ 123,199.89
2021	\$	-	\$ 123,199.89
2022	\$	11,396.37	\$ 134,596.26
2023	\$	7,179,349.15	\$ 7,313,945.41
2024	\$	12,705,223.98	
2025	\$	5,349,707.94	
Total	\$	25,368,877.33	True

CERTIFICATE OF SERVICE

I, Nicole Westling, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce

Comments

Docket No. E015/D-24-324

Dated this **20th** day of **December 2024**

/s/Nicole Westling

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	24-324D-24-324
2	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	24-324D-24-324
3	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	24-324D-24-324
4	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	24-324D-24-324
5	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	24-324D-24-324
6	Brandi	Winfield	bwinfield@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	24-324D-24-324