

Staff Briefing Papers

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|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|---------------|
| Meeting Date | June 4, 2026 | Agenda Item 2** | |
| Company | Minnesota Power | | |
| Docket No. | E015/RP-25-127 | | |
| | In the Matter of Minnesota Power’s Application for Approval of its 2025-2039 Integrated Resource Plan | | |
| Issues | What action should the Commission take, if any, regarding LPI’s motion to compel Minnesota Power to provide responses to certain information requests? | | |
| Staff | Isabel Ricker | isabel.ricker@state.mn.us | 651- 539-1083 |

✓ Relevant Documents

Date

IRP Documents

| | |
|--------------------------------------------------------------------------------------|------------------|
| Minnesota Power, Initial Filing, 2025-2039 Integrated Resource Plan | March 3, 2025 |
| Minnesota Power, Initial Filing, Appendix B - Demand Side Management | March 3, 2025 |
| Minnesota Power, Initial Filing, Appendix J - Assumptions and Outlooks | March 3, 2025 |
| Minnesota Power, Initial Filing, Appendix K - Detailed Analysis Section | March 31, 2025 |
| Minnesota Power, Initial Filing, Appendix L - Cost Impact Analysis by Customer Class | March 3, 2025 |
| Minnesota Power, Initial Filing, Revised Appendix P - Compliance Index | March 31, 2025 |
| Minnesota Power, Supplemental Comments (Clean Firm Plan) | January 15, 2026 |

Relevant Information Requests

| | |
|-----------------------------------------------------------|---------------|
| Minnesota Power Response to LPI Information Request No. 2 | June 30, 2025 |
|-----------------------------------------------------------|---------------|

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The attached materials are work papers of the Commission Staff. They are intended for use by the Public Utilities Commission and are based upon information already in the record unless noted otherwise.

✓ **Relevant Documents**

| | Date |
|------------------------------------------------------------|------------------|
| Minnesota Power Response to LPI Information Request No.30 | February 2, 2026 |
| Minnesota Power Response to LPI Information Request No. 31 | February 2, 2026 |
| Minnesota Power Response to LPI Information Request No. 46 | March 16, 2026 |

Motion and Response

| | |
|-----------------------------------------------------------------------------------------------|----------------|
| Large Power Intervenors, Notice of Motion and Motion to Compel | April 3, 2026 |
| Minnesota Power Reply Comments, Opposition to Motion to Compel Response to Discovery Requests | April 17, 2026 |

Related Docket: E015/M-24-382

| | |
|----------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Large Power Intervenors, Initial Comment <i>(cross-filed in Docket Nos. E015/M-24-382, E015/M-25-373, and E015/RP-25-127)</i> | December 1, 2025 |
| Minnesota Power, Reply Comments | December 11, 2025 |

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BACKGROUND

I. Issue Before the Commission

On April 3, 2026, the Large Power Intervenors (LPI) filed a Motion to Compel Minnesota Power to provide comprehensive rate and bill projections by customer class for the years 2026-2029, which it had previously sought in LPI Information Request Nos. 2c, 30, 31, and 46 in Minnesota Power's 2025 Integrated Resource Plan (IRP).

The issue before the Commission is: What action should the Commission take, if any, regarding LPI's motion to compel Minnesota Power to provide responses to these information requests?

II. Procedural Timeline

On March 3, 2025 Minnesota Power filed its 2025-2039 IRP, including Appendix L – Cost Impact Analysis by Customer Class.

On June 18, 2025, LPI filed Information Request 0002 asking the Company to, among other requests, update and reproduce Table 1 of Appendix L to include “all forecasted rate increases Minnesota Power anticipates each customer class will face, on a total-bill basis,” between 2025-2029.

On June 30, 2025 Minnesota Power responded, stating that Table 1 of Appendix L shows the cost impact of the resource plan by customer class.

On December 1, 2025 LPI filed initial comments in Docket Nos. E015/M-24-382, *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider*, and E015/M-25-373, *In the Matter of Minnesota Power's Renewable Resources Rider and 2026 Renewable Factor*. The comments were cross-filed in the instant docket, E015/RP-25-127, *In the Matter of Minnesota Power's 2025 2039 Integrated Resource Plan*.

On January 21, 2026, LPI filed Information Requests 0030 and 0031.

On February 2, 2026 Minnesota Power responded, stating that it does not have a projection of all-in customer rate increases into the future, but including an updated Table 1 from Appendix L, incorporating the Company's new ROE and recent changes in adjustment factors for fuel, capacity, conservation, and solar components.

On March 6, 2026, LPI filed Information Request 0046, requesting a projection of all-in rate and bill increases by customer class for 2026-2029, as requested in LPI Information Requests No. 2c, 30, and 31.

On March 16, 2026 Minnesota Power responded, stating that it does not have the consolidated rate projection LPI is requesting at this time.

On April 3, 2026, LPI filed a Motion to Compel Minnesota Power to provide the rate projections sought in LPI Information Request Nos. 2c, 30, 31, and 46.

On April 17, 2026 Minnesota Power filed its Reply in Opposition to LPI's Motion to Compel Responses to Discovery Requests.

III. Standard of Review

A. Motions

The Commission will need to consider what action to take on LPI's motion. Under Minn. R. 7829.0100, a "motion filing means a written request for specific commission action by a party within the context of an existing commission docket."¹ Minn. R. 7829.0410 contains filing and content requirements for motion filings, and establishes a 14 day response period for parties responding to the motion.

The Commission's rules do not contain special requirements for how or when the Commission will consider motions, except that "the commission will consider only motion filings signed by a party or the party's attorney or authorized representative."² "Parties" to Commission proceedings include persons or organizations commencing the proceeding, against whom a proceeding is commenced, those intervening in the proceeding, and intervenors of right (certain state agencies). Both Large Power Intervenors and Minnesota Power are parties in this proceeding.³

In summary, the Commission should consider LPI's motion, and can do so through typical Commission procedures on a timeline appropriate to the specific request.

B. Information Requests in Integrated Resource Plans

The motion at hand requests the Commission require Minnesota Power to provide responses to LPI information requests in an Integrated Resource Plan (IRP) proceeding. The Commission's rules contain the following requirements for information requests in IRPs:

Minn. R. 7843.0300, Subp. 8. Information requests. The parties shall comply with reasonable requests for information by the commission, other parties, and other interested persons. A copy of an information request must be provided to the commission and to known parties. Parties shall reply to information requests within ten days of receipt, unless this would place an

¹ [Minn. R. 7829.0100](#)

² [Minn. R. 7829.0410](#)

³ [Minn. R. 7829.0800](#)

extreme hardship upon the replying party. At least one copy of information provided to a party or other interested person must be filed with the commission. The replying party must also provide a copy of the information to any other party or interested person upon request. Disputes regarding information requests may be taken to the commission or, if a contested case proceeding has been ordered, to the assigned administrative law judge.⁴

Staff highlights three provisions relevant to this matter:

- “Parties shall comply with reasonable requests for information by the commission, other parties, and other interested persons...
- “Parties shall reply to information requests within ten days of receipt, unless this would place an extreme hardship upon the replying party...
- “Disputes regarding information requests may be taken to the commission.”⁵

Therefore, the Commission should consider whether the requests were reasonable, and whether responding would place an extreme hardship on Minnesota Power. In considering the second question, the Commission should also evaluate whether Minnesota Power’s answers provided thus far are reasonably responsive.

The Commission does not regularly receive motions to compel a response to information requests in IRPs. In several cases, the motion was resolved by parties without Commission action. However, Staff identified three Commission Orders in which the Commission made a disposition on a motion to compel IRP discovery:

- *In the Matter of Basin Electric Power Cooperative’s Integrated Resource Plan*, Docket No. ET-6125/RP-19-425, Order Granting Intervention and Requiring Basin to Respond to Information Requests, October 4, 2019.
- *In the Matter of Great River Energy’s 2015-2029 Resource Plan*, Docket No. ET-2/RP-14-813, Order Denying Motion to Compel, Accepting Resource Plan, and Setting Future Filing Requirements, October 26, 2015.
- *In the Matter of Interstate Power Company’s 1993 Biennial Resource Plan Filing*, Docket No. E001/RP-93-631, Order Compelling Response to Information Requests and Granting Additional Time to Comment, March 7, 1994.

In the first case, the Commission required the utility to provide answers to information requests from an intervening party, or to provide specific objections. In the second two cases, the Commission considered whether the information request was reasonable, and whether the responses already provided were reasonable. In 2015, the Commission dismissed a motion to

⁴ [Minn. R. 7843.0300](#)

⁵ *Ibid.*

compel in part because it found the request did not “have a reasonable likelihood of revealing evidence that would aid in evaluation of [the] resource plan.”⁶ In 1994, the Commission granted a motion to compel, and found that “the requested information would clearly help the Department understand and critique the Company’s forecast of energy and demand, its projected resource needs, and its plans to meet these needs.”⁷ The facts of each case differ significantly from the current matter and the prior orders do not have bearing on the Commission’s determination here. Nonetheless, the Commission may find these prior examples useful context as it considers LPI’s motion.

IV. Rate Impact Analysis Provided in Minnesota Power’s 2025 IRP

There are several provisions of Minnesota law and past Commission Orders that require a rate impact assessment that is included in Minnesota Power’s IRP. Under Minn. Stat. § 216B.1691, subd. 2e., electric utilities must submit a report to the Commission that estimates the rate impact of their resource plans and activities necessary to comply with the state’s renewable energy objectives and carbon free standard.⁸

Second, when reviewing a utility’s resource plan, the Commission must evaluate the plan’s ability to “keep the customers’ bills and the utility’s rates as low as practicable, given regulatory and other constraints,”⁹ among other factors under Minn. R. 7843.0500, subp. 3. Third, in its 2011 Order regarding Minnesota Power’s IRP, the Commission ordered Minnesota Power to include “a cost impact analysis by customer class” in its next resource plan.¹⁰ Minnesota Power stated that it has complied with this requirement by including a cost impact analysis by customer class in each subsequent integrated resource plan. In the 2025 IRP, the analysis is contained in Appendix L.¹¹

Appendix L provides estimated rate impacts of Minnesota Power’s 5 Year Power Supply Plan, which covers 2026-2029 and includes actions from prior approved IRPs as well as the Company’s preferred plan in the 2025 IRP. Minnesota Power used the revenue requirement outputs from the 2025 IRP long-term planning model (EnCompass) as the starting point for the cost analysis. Using the annual revenue requirement outputs (or “power supply cost”),

⁶ *In the Matter of Great River Energy’s 2015-2029 Resource Plan*, Docket No. ET2/RP-14-813, Order Denying Motion to Compel, Accepting Resource Plan, and Setting Future Filing Requirements, Oct. 26, 2015, at 7

⁷ *In the Matter of Interstate Power Company’s 1993 Biennial Resource Plan Filing*, Docket No. E001/RP-93-631, Order Compelling Response to Information Requests and Granting Additional Time, March 7, 1994, at 3.

⁸ [Minn. Stat. § 216B.1691 Subd. 2e](#)

⁹ Minn. R. 7843.0500, subp. 3.

¹⁰ *In the Matter of Minnesota Power’s 2010-2024 Integrated Resource Plan*, Docket No. E015/RP-09-1088, Order Accepting Resource Plan and Requiring Compliance Filings, May 6, 2011, ordering paragraph 5(f).

¹¹ *In the Matter of Minnesota Power’s 2025-2039 Integrated Resource Plan*, Docket No. E015/RP-25-127, IRP Appendix L: Cost Impact Analysis by Customer Class

Minnesota Power subtracted the 2025 power supply cost from the cost modeled for years 2026 through 2029 to find the incremental annual power supply cost.

Then Minnesota Power estimated rate impacts by customer class relative to 2025 base rates. The incremental costs were separated into power supply and solar costs, so that exempt customers were not allocated costs associated with the Solar Energy Standard. Minnesota Power then allocated these annual incremental costs to the Minnesota jurisdiction and to customer classes using the allocators and ratios between jurisdictional and class revenue apportionment from its last approved rate case. Class-specific power supply costs were then divided by forecasted energy usage by class to obtain incremental rates by class.¹²

Minnesota Power then compared these incremental rates to estimated 2025 base rates, which included estimates for the 2025 Renewable Resources Rider, Transmission Cost Recovery Rider, Capacity Revenue and Expense Adjustment, Fuel and Purchased Energy Adjustment, and Conservation Program Adjustment (for non-exempt classes).¹³

Minnesota Power's analysis found that the 2025 resource plan would increase the average power supply cost for each customer class approximately 2.30%-2.40% (compound average growth rate). Under these estimates, an average residential customer will see an increase of \$2.53 per month compared to 2025 and an average Large Power customer will see an increase of \$122,302 per month compared to 2025 levels.¹⁴

Table 1. Estimated Average Rate Impacts of 2025 Plan Relative to 2025 Projected Base Rates¹⁵

| Rate Class Impacts ⁹ | 2026 | 2027 | 2028 | 2029 | 2026-29 CAGR |
|---------------------------------------|--------|---------|---------|---------|--------------|
| Residential (avg rate, cents/kWh) | 14.961 | 14.961 | 14.961 | 14.961 | |
| Increase (cents/kWh) | 0.277 | 1.058 | 1.839 | 1.472 | |
| Increase (%) | 1.85% | 7.07% | 12.29% | 9.84% | 2.37% |
| Average Impact (\$ / month) | \$1.90 | \$7.24 | \$12.64 | \$10.10 | |
| General Service (avg rate, cents/kWh) | 15.005 | 15.005 | 15.005 | 15.005 | |
| Increase (cents/kWh) | 0.278 | 1.060 | 1.844 | 1.475 | |
| Increase (%) | 1.85% | 7.07% | 12.29% | 9.83% | 2.37% |
| Average Impact (\$ / month) | \$6.95 | \$26.41 | \$45.97 | \$36.40 | |

¹² Minnesota Power IRP, Appendix L at 1-2

¹³ Id, at 2

¹⁴ Minnesota Power IRP, Appendix L at 3

¹⁵ Minnesota Power IRP, Appendix L, Table 1.

| | | | | | |
|-------------------------------------------|----------|------------|------------|------------|-------|
| Large Light & Power (avg rate, cents/kWh) | 11.584 | 11.584 | 11.584 | 11.584 | |
| Increase (cents/kWh) | 0.218 | 0.823 | 1.429 | 1.146 | |
| Increase (%) | 1.88% | 7.11% | 12.33% | 9.89% | 2.39% |
| Average Impact (\$ / month) | \$437.78 | \$1,616.59 | \$2,756.65 | \$2,147.10 | |
| | | | | | |
| Large Power (avg rate, cents/kWh) | 8.937 | 8.937 | 8.937 | 8.937 | |
| Increase (cents/kWh) | 0.160 | 0.634 | 1.109 | 0.885 | |
| Increase (%) | 1.80% | 7.09% | 12.41% | 9.90% | 2.39% |
| Average Impact (\$ / month) | \$94,071 | \$371,582 | \$600,104 | \$489,207 | |
| | | | | | |
| Lighting (avg rate, cents/kWh) | 45.778 | 45.778 | 45.778 | 45.778 | |
| Increase (cents/kWh) | 0.779 | 3.034 | 5.388 | 4.362 | |
| Increase (%) | 1.70% | 6.63% | 11.77% | 9.53% | 2.30% |
| Average Impact (\$ / month) | \$1.08 | \$4.19 | \$7.43 | \$5.97 | |
| | | | | | |
| Avg Weighted Increase (cents/kWh) | 0.192 | 0.746 | 1.298 | 1.035 | |
| Avg Weighted Increase (%) | 1.82% | 7.09% | 12.33% | 9.82% | 2.37% |

MOTION TO COMPEL

V. Large Power Intervenors Motion

On April 2, 2026 Large Power Intervenors (LPI) filed a motion asking the Commission to order Minnesota Power to “provide responsive documents to LPI Information Request Nos. 2c, 30, 31, and 46 because Minnesota Power has failed to provide responsive documents or information.”¹⁶ LPI argued that the information it requested is both required under Minnesota law (specifically, Minn. Stat § 216B.2422 and Minn. R. Chapter 7843), and necessary to enable LPI to develop an adequate record for Commission review of the IRP.

LPI members comprise roughly two-thirds of Minnesota Power’s load, and therefore any cost impacts of the IRP are significant for LPI members.¹⁷ LPI noted it has been participating productively in the IRP proceeding, submitting initial comments and at least 78 information requests. Since the motion was filed, LPI has also filed reply comments and responded to information requests from Minnesota Power.

LPI noted that it has repeatedly sought information on forecasted rate increases on a total-bill basis from Minnesota Power, submitting three rounds of information requests to this effect:

¹⁶ LPI Motion at 1.

¹⁷ LPI Motion at 2.

- June 18, 2025:¹⁸ LPI Information Request 2
- January 21, 2026: LPI Information Requests 30 and 31
- March 6, 2026: LPI Information Request 46

LPI also filed initial comments on December 1, 2025 in response to open comment periods in Minnesota Power’s transmission cost recovery rider (TCR) and renewable resource rider (RRR) dockets,¹⁹ and cross-filed the comments in Minnesota Power’s IRP docket. Relevant to the IRP, LPI requested that Minnesota Power provide additional information in its then-upcoming Clean Firm Plan filing on January 15, 2026:

- “Updated table (i.e., Table 1 from Appendix L to the IRP) in its Clean Firm Plan filing in the pending IRP docket with the following information:
 - A current and accurate starting point for 2026 average rates for each of the customer classes; and
 - A current and accurate projection of all-in rate increases each customer class is projected to experience over the 2026-2029 timeframe.”²⁰

These three IRs and December 1, 2025 comments sought essentially the same information: an updated version of Table 1 in IRP Appendix L, including all forecasted rate increases Minnesota Power anticipates its customers will face, on a total-bill basis, from 2026-2029. Minnesota Power filed responses to each of these information requests, stating that it had already complied with Commission and statutory requirements regarding rate impact of the IRP, and that it does not have a projection of all-in customer rate increases into the future.

Minnesota Power responded to LPI’s comments in the TCR and RRR dockets. While Minnesota Power did not include the information requested by LPI in its December 1 comments in the Company’s January 15, 2026 Clean Firm Plan filing, it did provide an updated Table 1 using average 2026 rates by customer class in its response to LPI IR 31b(i). LPI characterized Minnesota Power’s responses as insufficient and “a refusal to provide pertinent information to LPI about the rate increases it can anticipate from the Company’s IRP.”²¹ LPI also questioned how the Company can assert cost savings for existing customers from the addition of a new very large customer, without having such all-in rate forecasts available.²²

¹⁸ LPI IR 2 is dated June 18, 2025 but was filed in eDockets June 20, 2025.

¹⁹ *In the Matter of Minnesota Power’s Petition for Approval of a Transmission Cost Recovery Rider*, Docket No. E015/M-24-382, Notice of Extended Comment Period (Nov. 18, 2025) and *In the Matter of Minnesota Power’s Renewable Resources Rider and 2026 Renewable Factor*, Docket No. E015/M-25-373, Notice of Extended Comment Period (Oct. 29, 2025). Both established December 1, 2025, as the deadline for initial comments.

²⁰ LPI Initial Comments, Docket Nos. E015/M-24-382, E015/M-25-373, E015/RP-25-127, December 1, 2025, at 10

²¹ LPI Motion at 2

²² LPI Motion at 2

A. Information Requests at Issue

Staff includes each of the LPI information requests that are the subject of this motion, and a summary of Minnesota Power's responses below.

1. LPI Information Request 2

On June 18, 2025,²³ LPI filed **LPI IR 2. Subpart c** of this IR requested Minnesota Power "update and reproduce Table 1 to include all forecasted rate increases Minnesota Power anticipates its customers will face, on a total-bill basis, for the years referenced."

Minnesota Power responded that the information provided in Appendix L complies with Minn. Stat. § 216B.1691, subd. 2e, Minn. R. 7843.0500, subp. 3, and a 2011 Commission order requiring Minnesota Power to include a "cost impact analysis by customer class" in its next resource plan²⁴ which it has included in every subsequent IRP including the 2025 IRP. Minnesota Power explained that Table 1 includes all forecasted "power supply costs associated with the implementation of Minnesota Power's 2025 IRP Base Plan over the five-year period referenced. Each rate class in Table 1 has a row stating the "Average Impact (\$/month)" which is this model's representation of the bill impact."²⁵

2. LPI Information Request 30

On January 21, 2026, LPI filed LPI IRs 30 and 31. **LPI IR 30** requested Minnesota Power respond to LPI IR 2c.

Minnesota Power responded that "the Company does not have a projection of all-in customer rate increases into the future." The Company noted it provides rate impact analysis in various dockets, comparing against the current rates available at the time the filing is being prepared.

Minnesota Power also asserted that "it is not possible to accurately project customer rates on a total-bill basis for several years into the future. Firstly, it is impossible to know specific future costs the Company will incur and what recovery the Commission will approve in rate cases and cost recovery filings."²⁶ Second, Minnesota Power pointed out that the estimated cost increases in an IRP are different from cost increases that may be seen in future rate cases or rider filings as the IRP identifies general size, type, and timing of new generating resources—not specific projects.

²³ LPI IR 2 is dated June 18, 2025 but was filed in eDockets June 20, 2025.

²⁴ *In the Matter of Minnesota Power's 2010-2024 Integrated Resource Plan*, Docket E-015/RP-09-1088, Order Accepting Resource Plan and Requiring Compliance Filings (May 6, 2011).

²⁵ Minnesota Power Response to LPI IR 2, part c.

²⁶ Minnesota Power Response to LPI IR 30.

3. LPI Information Request 31

LPI IR 31 requested Minnesota Power:

- “Admit that the information requested by LPI [in its December 1, 2025 Initial Comment] was not included in the Clean Firm Plan Filing.
- Update Table 1 from Appendix L to the IRP with the following information:
 - A current and accurate starting point for 2026 average rates for each of the customer classes; and
 - A current and accurate projection of all-in rate increases each customer class is projected to experience over the 2026-2029 timeframe.”

Minnesota Power responded that, contrary to LPI’s assertion in its December 1 Initial Comments, there are no discrepancies in cost estimates across the three dockets (the 2025 IRP, the 2024 TCR and 2025 RRR). Minnesota Power stated that it has “used the same consistent approach for years: the average current rates used in rate impact calculations are updated with the latest available rates at the time the filing is being prepared,”²⁷ and the baseline used (2025 Projected Base Rates) was current and accurate at the time of the filing.

In response to LPI’s request, Minnesota Power updated Table 1 using rates in effect as of January 1, 2026 as a starting point, rather than estimated 2025 base rates which were used in IRP Appendix L. This update reflects a lower 9.65% ROE, and changes to the fuel and purchased energy adjustment, capacity and expense and revenue adjustment, conservation program adjustment, and the solar factor adjustment, which went into effect after the 2025 IRP was filed. This updated Table 1 is shown below.

Updated Table 1: Estimated Average Rate Impacts of 2025 Plan Relative to Base Rates as of 1/1/2026

| Rate Class Impacts ¹ | 2026 | 2027 | 2028 | 2029 |
|---------------------------------------|--------|---------|---------|---------|
| Residential (avg rate, cents/kWh) | 14.918 | 14.918 | 14.918 | 14.961 |
| Increase (cents/kWh) | 0.277 | 1.057 | 1.838 | 1.471 |
| Increase (%) | 1.86% | 7.09% | 12.32% | 9.86% |
| Average Impact (\$ / month) | \$1.90 | \$7.24 | \$12.63 | \$10.09 |
| General Service (avg rate, cents/kWh) | 14.961 | 14.961 | 14.961 | 14.961 |
| Increase (cents/kWh) | 0.278 | 1.060 | 1.844 | 1.475 |
| Increase (%) | 1.86% | 7.09% | 12.33% | 9.86% |
| Average Impact (\$ / month) | \$6.95 | \$26.41 | \$45.97 | \$36.40 |

²⁷ Minnesota Power Response to LPI IR 30.

| | | | | |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------|------------|------------|
| Large Light & Power (avg rate, cents/kWh) | 11.554 | 11.554 | 11.554 | 11.554 |
| Increase (cents/kWh) | 0.218 | 0.823 | 1.428 | 1.145 |
| Increase (%) | 1.88% | 7.12% | 12.36% | 9.91% |
| Average Impact (\$ / month) | \$437.47 | \$1,615.43 | \$2,754.65 | \$2,145.55 |
| | | | | |
| Large Power (avg rate, cents/kWh) | 8.913 | 8.913 | 8.913 | 8.913 |
| Increase (cents/kWh) | 0.160 | 0.634 | 1.109 | 0.885 |
| Increase (%) | 1.80% | 7.11% | 12.44% | 9.93% |
| Average Impact (\$ / month) | \$94,050 | \$371,497 | \$599,968 | \$489,097 |
| | | | | |
| Lighting (avg rate, cents/kWh) | 45.644 | 45.644 | 45.644 | 45.644 |
| Increase (cents/kWh) | 0.779 | 3.034 | 5.388 | 4.362 |
| Increase (%) | 1.71% | 6.65% | 11.80% | 9.56% |
| Average Impact (\$ / month) | \$1.08 | \$4.19 | \$7.43 | \$5.97 |
| | | | | |
| Average Weighted Increase (cents/kWh) | 0.192 | 0.746 | 1.298 | 1.034 |
| Avg Weighted Increase (%) | 1.83% | 7.10% | 12.36% | 9.85% |
| | | | | |
| ¹ Average current rates are based on 2024 base rates from Minnesota Power's last rate case (E-015/GR-23-155) updated to a lower 9.65% ROE and applicable cost recovery rider rates as of 1/1/2026. | | | | |

Staff notes that the 2026 base rates shown in updated Table 1 (the top row for each class) are slightly smaller than original Table 1: each class shows a drop of 0.02-0.04 cents/kWh, except for lighting which dropped 0.13 cents/kWh. Similarly, the estimated incremental costs of Minnesota Power's base plan are very similar (but slightly smaller) in updated Table 1 compared to original Table 1. The largest absolute change is for the Large Power class, which sees a \$136 decline in average monthly impacts projected for 2028 compared to the original Table 1. Note, however, this is 0.02% lower than the original estimate.

4. LPI Information Request 46

On March 6, 2026, LPI filed **LPI IR 46**, requesting Minnesota Power answer the questions contained in LPI IRs 2c, 30, and 31 and provide a projection of all-in rate and bill increases each customer class is projected to experience over the 2026-2029 timeframe.

Minnesota Power reiterated that it does not have a consolidated rate projection as LPI has requested, and there is no existing obligation that or proceeding where the Company prepares "all-in" customer rate projections. However, Minnesota Power acknowledged that this request has come up in other proceedings and,

[A]s stated during the Commission March 5, 2026 Agenda Meeting, the

Company is committed to working with the Department of Commerce (“Department”) to determine the appropriate proceeding to submit such an “all-in” customer rate projection for evaluation. Though these discussions with the Department have not yet occurred, such an “all-in” rate projection for the test year may potentially be included with the Company’s next rate case filing because rate case proceedings offer the most comprehensive analysis of costs across various categories (and not only generation resources like in this proceeding) and the resulting impacts to customer rates.²⁸

Staff notes that the commitment referenced here was made verbally during the Commission’s consideration of Minnesota Power’s Petition for Approval of its 2025 Transmission Cost Recovery Rider,²⁹ but was not reflected in the Commission’s March 10, 2026 Order.³⁰

DISCUSSION

VI. LPI Arguments for Compelling Discovery

LPI argued that Minnesota Power should be required to respond to these information requests for several reasons. First, LPI argued that its information requests are reasonable, and therefore require a response, because the all-in cost projections sought are a critical consideration under applicable laws, including Minn. Stat. § 216B.2422, Minn. R. 7843.0400, and Minn. R. 7843.0500.

LPI noted that all three of these provisions contain requirements for the utility and/or Commission to consider the cost of the resource plan and to prioritize least-cost planning:

- Minn. Stat. § 216B.2422 requires a utility to include in its IRP “the least cost plan for meeting 50 and 75 percent of all energy needs... through a combination of conservation and renewable energy resources.”³¹
- Minn. R. 7843.0400 subp. 3 requires the resource plan to include certain supporting information regarding “availability, reliability, cost, socioeconomic effects, and environmental effects.”³²
- Minn. R. 7843.0500 requires the Commission to issue a decision on an IRP based on

²⁸ Minnesota Power Response to LPI IR 46.

²⁹ March 5, 2026 Agenda Meeting of the Minnesota Public Utilities Commission. [Meeting details and Webcast recording available here.](#)

³⁰ *In the Matter of Minnesota Power’s Petition for Approval of its 2025 Rate Adjustment Mechanism (2025 Transmission Factor) Under its Rider for Transmission Cost Recovery*, Commission Order, March 10, 2026.

³¹ Minn. Stat. § 216B.2422, subd. 2(a, c)

³² Minn. R. 7843.0400, subp. 3.

information filed in the record, including responses to information requests,³³ and also requires that the Commission consider the ability of resource options to “keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints,”³⁴ among other factors it must consider.

In LPI's view, it was entirely reasonable for LPI to request forecasts of all-in rate increases. Further, LPI stated that “it is difficult to understand how the Commission could adequately consider whether customers' rates and bills are kept as low as practicable in the absence of this information.”³⁵

Second, LPI argued that Minnesota Power would also be required to produce the information if the IRP were a contested case, and argued that it would be appropriate for the Commission to take this into account, since in LPI's view, the scale of planned investments will inevitably prompt a series of rate cases which will be handled as contested cases.³⁶

LPI summarized the contested case discovery rules under Minn. R. 1400.6700, subp. 2 and Minn. R. Civ. P. 26.02(b), as entitling parties to obtain discovery related to any nonprivileged matter relevant to any party's claim and proportional to the needs of the case. “These discovery rules do not permit a party to withhold documents if they are necessary for the proper presentation of the requesting parties' case, the requests are not intended to delay, and the amounts in controversy are significant enough to warrant the discovery.”³⁷

LPI addressed each of these factors as follows:

LPI stated it requires the information requested for the presentation of its case. LPI asserted that “without a full picture of the cost of the Company's IRP, LPI cannot appropriately analyze the filing and believes the Commission cannot make a fully informed decision without this cost information.”³⁸ LPI found the incremental cost information provided in IRP Appendix L insufficient because it does not give customers or the Commission a complete picture of what Minnesota power's plan will cost. Additionally, LPI argued that bill estimates are necessary for the Commission to evaluate the plan's ability to satisfy Minn. R. 7843.0500, Subp. 3(B) (keep customers' bills and the utility's rates as low as practicable....).

LPI emphasized that its requests were not made with the intent to delay the proceeding. The requests were made well in advance of commenting deadlines, and LPI requested the

³³ Minn. R. 7843.0500, subp. 1.

³⁴ Minn. R. 7843.0500, subp. 3.B.

³⁵ LPI Motion at 3.

³⁶ LPI Motion at 4.

³⁷ LPI Motion at 4, citing to Minn. R. 1400.6700, subp. 2.

³⁸ LPI Motion at 4.

information multiple times beginning in June 2025. LPI asserted the Company has had sufficient time to generate the requested information if it does not already exist.

Finally, LPI argued that the amounts in controversy are certainly enough to warrant discovery. As indicated in Table 1 of Appendix L, Minnesota Power expects average monthly costs to increase by approximately 2.37 percent per year (compound average growth rate) as a result of its preferred plan, compared to 2025 levels. For the average Large Light & Power customer, monthly bills in 2028 are estimated to be \$2,756.65 higher than in 2025, and for the average Large Power customer, monthly bills in 2028 are estimated to be \$600,104 higher than in 2025.³⁹ LPI stated these increases are significant and do not even capture the full rate impact of the IRP. LPI acknowledged that not all costs can be known for certain at this stage, but argued that customers are entitled to know what their all-in costs are going to be.

Overall, LPI argued that the Commission's evaluation requires this information, that customers have a right to know all-in costs for the coming five years, and as a result, the public interest in producing the requested documents outweighs the burden of producing them.

VII. Minnesota Power Response

On April 17, 2026 Minnesota Power filed its Response in Opposition to the Motion to Compel. Minnesota Power argued that the motion should be dismissed because:

Ultimately it is not reasonable or proportional to “compel” the Company to undertake a rate increase-focused rate or bill analysis by rate class that goes well beyond Commission rules, statutes, and prior Commission orders; that is not consistent with longstanding IRP practices among Minnesota utilities; that would be time-intensive to develop and require extensive guesswork; that the Company does not support as either factually reliable nor a reasonable basis for evaluating the low-cost nature of the IRP plan; and that is not consistent with the public interest.⁴⁰

Minnesota Power explained that it had answered LPI's previous information requests in good faith with detailed explanation of why the requested projections do not exist and why any such projections would not be accurate.⁴¹

Minnesota Power's arguments for dismissing the motion fall into three primary categories:

1. The information requested by LPI is not required by Minnesota Statutes, Rules and

³⁹ Note, these estimates are from Minnesota Power IRP Appendix L, filed March 3, 2025. Minnesota Power provided updated rate and bill impacts in Response to LPI IR 31, Attachment, filed February 2, 2026. The updated estimates for 2028 are \$2,754.65 (Large Light & Power) and \$599,968/month (Large Power).

⁴⁰ Minnesota Power Response at 17.

⁴¹ Minnesota Power Response at 6.

Commission Orders, and the Company provided all required information in its IRP filing.⁴²

2. The information requested does not yet exist, and would be burdensome to develop.⁴³
3. The information requested is not reasonably relevant to the IRP because such projection would contain many costs and assumptions unrelated to generation resources, and it is not clear how such information would aid the Commission in comparing resource options.⁴⁴

Each of these arguments is discussed in detail below.

A. Compliance with Minnesota Statutes, Rules, and Commission Orders

Minnesota Power refuted LPI's assertion that all-in rate and bill projections are necessary to sufficiently evaluate an IRP under Minn. Stat. § 216B.2422, Minn. R. 7843.0400, and Minn. R. 7843.0500. The Company stated that its initial IRP filing in March 2025 fully satisfied these requirements and what LPI is requesting goes far beyond what is necessary for evaluating an IRP. Further, Minnesota Power stated it has never been required to provide such projections in prior IRP filings and does not undertake them in the course of its business.⁴⁵

For the specific sections of Statute and Rule cited by LPI, Minnesota Power provided the following explanations of why all-in rate projections are not required and/or not relevant:

- **Minn. Stat. § 216B.2422, subd. 2(c)** provides that a resource plan should include “the least cost plan for meeting 50 and 75 percent of all energy needs from both new and refurbished generating facilities through a combination of conservation and renewable energy resources.” Minnesota Power argued the statute is specific to determining the least cost resource plan that would meet these conservation and renewable energy goals, and does not apply to general projections of future rates.
- **Minn. R. 7843.0400, Subp. 3:** The Company argued that it complied with this Rule by providing an evaluation of resource options’ “availability, reliability, cost, socioeconomic effects, and environmental effects,” as required by the Rule, in Section V, Appendix B, and Appendix J of its IRP.⁴⁶
- **Minn. R. 7843.0500, Subp. 3C:** According to Minnesota Power, the purpose of Appendix L is to allow the Commission to evaluate the ability of the resource plans and resource

⁴² Minnesota Power Response at 7.

⁴³ Minnesota Power Response at 17.

⁴⁴ Minnesota Power Response at 10.

⁴⁵ Minnesota Power Response at 7.

⁴⁶ Minnesota Power Response at 8

options to “keep the customers’ bills and the utility’s rates as low as practicable given regulatory and other constraints,” consistent with this provision. Additionally, the Company noted that Appendix K includes a cost performance comparison of the major scenarios studied in the IRP: the three scenarios for Boswell Energy Center and all load scenarios.

The Company argued that it provided all the cost impact data that is necessary to evaluate the 2025 Plan. Additionally, Minnesota Power pointed out that at the request of LPI, it updated Table 1 of Appendix L to reflect compare estimated average rate impacts of the 2025 IRP to January 1, 2026 base rates.

Relatedly, Minnesota Power expressed concern that LPI’s was an unusual request and went beyond analysis that is typically performed in IRPs—Minnesota Power asserted “no other electric utility in Minnesota has provided the analysis LPI requests.”⁴⁷

B. The Analysis Does Not Exist and Would Be Burdensome to Develop

Minnesota Power objected to the scope of LPI’s request, which it argued goes well beyond the IRP and would involve extensive guesswork on a broad range of topics, including the results of future resource procurements, future revenues by class, non-IRP O&M and capital costs, cost recovery the Commission may or may not permit, base rate and rider treatment for both IRP and non-IRP projects and costs, rate design, and revenue allocation.

The Company stated it does not have such all-in projections and does not complete these as a normal course of business. Therefore, Minnesota Power would need to create the rate projection which it argued is not reasonable. Minnesota Power asserts that the rules around information requests in the IRP focus on the production of information, not creation of it,⁴⁸ and “a motion to compel discovery should be denied when the non-moving party in good faith identifies that the information requested does not exist or is not in the format requested by the moving party. Nor does a party have an obligation to develop projections it does not already have.”⁴⁹

Minnesota Power argued that if LPI’s position on discovery requirements were accurate, any party would have the right to “compel” other parties to generate forecasts and projections. For example, Minnesota Power could compel LPI members to provide forecasts of their individual load and power purchases, regardless of whether they maintained or supported such forecasts.⁵⁰

⁴⁷ Minnesota Power Response at 9

⁴⁸ Minnesota Power Response at 11

⁴⁹ Minnesota Power Response at 11-12, see also footnotes 30 and 31.

⁵⁰ Minnesota Power Response at 12

Minnesota Power also explained what it sees as the difference between incremental rate and bill forecasts by customer class, and a comprehensive customer impact analysis. The former shows the difference in rates or bills *associated with the factor at issue*—in this case, implementation of the preferred resource plan. In contrast, all-in, long-term bill or rate projections are much more speculative as they require assumptions about many independent factors.⁵¹

Due to the scope of the analysis that would be required, and the speculative nature of estimates involved, Minnesota Power said that any potential benefits of having this information do not outweigh the burden of producing it.⁵²

C. Lack of Relevance to the IRP

Minnesota Power additionally argued that if this were a civil litigation discovery dispute, courts would limit discovery requests to information that is relevant to a party's claim or defense and proportional to the needs of the case,⁵³ and that, in Minnesota Power's view, LPI's motion is neither reasonably relevant nor proportional, and does not support the public interest.

Minnesota Power asserted the requested information is not relevant to making a decision in the IRP because (1) it would not be accurate, and therefore couldn't be relied on, (2) would entail making forecasts or assumptions on a large range of issues unrelated to resource selection, and (3) LPI has not explained how the analysis would inform recommendations in the IRP.

The Company stressed that even if such a projection was reliable, this exercise would not help the Commission evaluate whether a particular resource option or plan keeps bills or rates as low as practicable, and argued that LPI had not identified how it could influence the IRP. In contrast, Minnesota Power said the rate impact analysis already provided in Appendix L and Response to LPI IR 31 provides an estimate of the rate impacts associated with the Company's preferred resource plan.⁵⁴

Regarding proportionality, Minnesota Power listed seven topics on which it would have to gather information or make projections in order to develop an all-in rate and bill forecast:

1. Future customer sales revenues for all classes
2. Specific costs for future projects that are only generically identified in the IRP
3. A wide variety of factors affecting capital and O&M costs, including distribution and technology needs, labor, future revenues, inflation impacts, cost of future capital, etc.

⁵¹ Minnesota Power Response at 13

⁵² *Ibid.*

⁵³ *Ibid.* citing to Minn. R. Civ. P. 26.02(b).

⁵⁴ *Id.* at 11

4. The timing of future rate cases.
5. What cost recovery the Commission may or may not allow in rate cases.
6. Potential use of other cost recovery mechanisms, such as trackers, riders, amortizations and deferrals.
7. Future Commission decisions on class allocation and rate design.

Additionally, Minnesota Power noted that, to the extent LPI argues that the all-in projections are necessary to consider future affordability, it would have to determine what level of cost is likely to be “affordable” for future customers.⁵⁵

Forecasting each of these areas would be time and resource intensive, but more importantly, would require extensive speculation on numerous topics beyond the Company’s control, that Minnesota Power argued will make the results unreliable.

Regarding whether having this information in the IRP would serve the public interest overall, Minnesota Power noted that the IRP is several steps removed from rate approvals. After an IRP is approved, the associated costs will be evaluated in proceedings for resource procurement, base rate and rider petitions, and rate design proceedings will impact class cost allocations. The Company said this phased approach helps ensure Commission decisions are based on current data and forecasts, and ensures that there will be multiple opportunities for the Commission and stakeholders to consider costs and impacts on rates and affordability.

Minnesota Power also warned that rate projections can be misused or misinterpreted by the public and could be used, for example, to encourage or discourage self-generation, influence economic development choices, influence commercial customer operations. In some cases, such decisions could negatively affect residential or other customers. The Company could not identify how LPI intends to use the requested projections to evaluate resource options, and offered that it was not clear whether LPI is seeking the rate projections for internal competitive reasons unrelated to the IRP, which could have unintended consequences for both LPI and non-LPI customers.⁵⁶

Given that Minnesota Power believes the all-in rate projections requested are not required, would be labor intensive to produce, highly speculative, and do not have a clear bearing on the IRP decisions before the Commission, the Company recommended denial of LPI’s motion.

STAFF ANALYSIS

Overall, the Commission should determine if LPI’s requests are reasonable, if Minnesota Power’s prior responses were reasonably responsive, and if producing the additional requested

⁵⁵ Minnesota Power Response at 15

⁵⁶ Minnesota Power Response at 16-17

material would impose an excessive burden on the Company.

There is no disagreement in the record that the Commission is required to consider costs and rate impacts when evaluating a utility's IRP under Minn. R. 7843.0500, subp. 3, nor is there disagreement that utilities are required to file an assessment of the rate impact of compliance with Minnesota's renewable energy objectives and carbon free standard (collectively, Standards) under Minn. Stat. § 216B.1691, subd. 2e.

There is disagreement on whether the requested information is germane to the IRP, and whether producing it would be excessively burdensome.

VIII. Relevance to the IRP

Information requests are an important part of the record-development process in IRPs. The Commission has previously emphasized the importance of utilities (and other parties) responding fully and in good faith to information requests so that the Commission has the record it needs to fully assess the options and determine what plan is most in the public interest.⁵⁷

Staff understands LPI's request be a rate and bill outlook that would forecast of total base rates, riders, and all customer charges for each class through 2029. LPI used the terms "all-in" and "total-bill basis" to describe the forecast it is looking for.⁵⁸ It appears that such a forecast would require assessing the rate impacts of costs to be incurred in all areas of utility operations, including many – distribution infrastructure, customer programs, customer service, wildfire mitigation, just to name a few – that are largely or entirely unrelated to electricity generation resource choices.

Staff concurs with Minnesota Power that such a rate and bill outlook would also require forecasting economic factors, some of which are entirely outside of its control, such as inflation, cost of debt, revenues from each class, and more. The utility already makes assumptions about some, though not all, of these factors as part of load forecasting and IRP modeling.

Staff certainly sees the appeal, especially to large power users, of having an all-in rate and bill forecast several years into the future. While Staff believes the Company could develop forecasts on all of these factors if directed to, and the Commission and stakeholders could assess their reasonableness, Staff has two primary concerns about doing so in the IRP. First, there may be significant procedural impacts of asking a utility to develop new forecasts on numerous financial factors and spending plans to inform an all-in rate forecast during IRPs. Essentially, this would ask the utility to file a preview of future rate cases in the IRP. Doing so

⁵⁷ *In the Matter of Detailing Criteria and Standards for Measuring a Utility's Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. § 216B.1691*, Docket No. E-999/CI-03-869, Order Clarifying Criteria And Standards For Determining Compliance Under Minn. Stat. § 216b.1691, March 19, 2010.

⁵⁸ LPI IR 2c

could quickly expand the scope of the IRP away from resource selection issues into customer service and financial issues that are best dealt with in rate cases and rider proceedings pertinent to those specific topics.

Second, Staff is unsure how the information LPI seeks would help to inform recommendations on which resource options the Commission should approve. In an all-in rate forecast, generation resources and related power supply costs will be a smaller share of the incremental costs being evaluated. Adding forecasted spending across the utility's operations and assumptions on myriad financial factors is likely to obscure the rate impact of each resource choice and reduce the differences that are visible between alternative resource plans.

In order to assess the difference in rate impact between various resource options, an intervenor could ask the utility to compare the rate impact analysis of its preferred plan (such as the one Minnesota Power provided in Appendix L) to a rate impact analysis of an alternate plan, using the same allocation assumptions but using annual revenue requirements associated with different plans. Such an analysis is much more likely, in Staff's view, to reveal differences in rate impacts from different resource choices, and therefore could inform the Commission's decision on an IRP.

The existing rate impact analysis provided only captures five years, which Staff acknowledges may not be sufficient time to see the full scale of differences in resource plans given the long-term horizon of resource planning. Most of the new resources requested for approval in Minnesota Power's 2025 IRP would not go into service until 2030 or later—after the window of the rate impact analysis provided in Appendix L. If LPI is concerned about this timing mismatch, it has the option of requesting the analysis be extended to additional years.

IX. Burden of Producing the Information

The Commission should also consider whether producing the requested information would unreasonably burden Minnesota Power, and if the Company's prior responses were reasonably responsive. The Company did not provide an estimate of the cost or labor hours that would be required to produce the all-in rate forecast, so the Commission may wish to ask for this at the hearing or use its judgement to assess if the burden is reasonable.

Staff finds that Minnesota Power provided timely and explanatory responses to LPI's information requests, but it has not provided the primary data LPI is seeking—an all-in rate forecast by class through 2029. Whether or not the Commission finds the Company's existing responses reasonable may depend on whether it agrees with LPI that the Company should already have a multi-year rate and bill forecast and whether it agrees the all-in, total-bill view of rates is necessary to adequately review the resource plan.

X. Related Proceedings Underway to Improve Rate Impact Assessments

If the Commission chooses to deny or dismiss LPI's motion, it could direct parties to work together to ensure adequate rate impact information is available in IRPs through other means.

As mentioned earlier, Minnesota Power committed at the March 5, 2026 Agenda Meeting that it would work with the Department to determine the appropriate proceeding to submit an all-in customer rate projection for evaluation. In Minnesota Power's Response to LPI IR 46, it indicated that it was considering including an "all-in" rate projection for the test year with the Company's next rate case. Commissioners may wish to ask the Company and Department for an update on this conversation during the hearing.

If the Commission would like to see an all-in rate projection, Staff suggests that a rate case is a preferable proceeding for that information to be provided and evaluated. The analysis would deliver the intended benefits of providing context for approvals of incremental costs, and would be more directly relevant to the other issues in the case. If the Commission wants to direct Minnesota Power to include this all-in projection in its next rate case, it can do so with **Decision Option 3**.

Additionally, Staff notes that the Minnesota Large Industrial Group (MLIG), which has some members in common with LPI, made a similar request for comprehensive rate projections in its Comments in 2024 and 2025 in the Carbon Free Standard docket, E999/CI-23-151. In that proceeding, the discussion of long-term cost and rate information was focused on what information would enable the Commission to evaluate the cost of compliance with the Standards, especially in the case of a petition to modify or delay compliance.

The Commission considered this issue at its April 23, 2026 Agenda Meeting and voted to approve decision options that clarified IRPs are the preferred proceedings for tracking rate impacts of compliance with the Standards, that the Commission favors forward-looking, long-term cost information when analyzing rate impacts of the Standards, and that intervenors requesting information related to rate impacts of future compliance with the Standards are making a reasonable request.⁵⁹

At the April 23, 2026 Agenda Meeting, the Commission determined that IRPs are an appropriate place to evaluate the cost impacts and rates associated with compliance with the Standards, and indicated that utilities should respond to information requests on this topic. The Order memorializing this decision has not been issued yet. As discussed above, however, there are significant differences between the rate impact evaluations contemplated in the Carbon Free Standard proceeding and what LPI is requesting. The rate impact assessments utilities have historically performed to evaluate the cost of compliance have focused on calculating the net incremental cost to power supply and transmission, rather than a total-bill forecast.

Also at the April 23, 2026 Agenda Meeting regarding the Carbon Free Standard, the Commission delegated to the Executive Secretary authority to begin proceedings to review the 2015 Order that lays out requirements for utility rate impact reports to comply with Minn. Stat. § 216B.1691, subd. 2e. This proceeding will evaluate how to update this Order to adequately

⁵⁹ April 23, 2026 Agenda Meeting of the Minnesota Public Utilities Commission, Order Forthcoming. [Meeting details and Webcast recording available here.](#)

cover all of the Standards. While the scope of this proceeding has not been established, and focuses on the impacts of compliance with the Standards, it is possible that discussion of long-term overall rate forecasts as context for the cost of compliance would be productive in this venue.

XI. Conclusion

If the Commission agrees with LPI that the information requests are reasonable and Minnesota Power's responses to-date are insufficient, it should direct Minnesota Power to produce the requested information with **Decision Option 1**. If selecting Decision Option 1, Staff recommends also selecting **subpart A**, which would set a deadline approximately one month following this Agenda Meeting for the Company to file the information. The Commission can adjust this date as desired.

If the Commission does not find LPI's requests reasonable, or finds that Minnesota Power already provided a reasonable response, it can deny the motion with **Decision Option 2**.

If the Commission does not find the requested information reasonable to compel from Minnesota Power in the IRP, but would like to Minnesota Power to file an "all-in" rate projection for the test year for each customer class with the Company's next rate case, it can direct the Company to do so with **Decision Option 3**.

DECISION OPTIONS

Motion to Compel

1. Grant LPI's motion to compel Minnesota Power to produce documents responsive to LPI Information Requests 2c, 30, 31, and 46. (LPI)
 - A. Minnesota Power must file its responses in this docket by July 6, 2026.

OR

2. Deny LPI's Motion to Compel Responses to LPI Discovery Requests 2c, 30, 31, 46. (Minnesota Power)

Future Rate Case Requirement

3. With Minnesota Power's next-filed rate case, the Company shall include an "all-in" rate projection for the test year, estimating total rates that each customer class will pay, on average, when accounting for changes proposed in the rate case. (Staff option)