



AN ALLETE COMPANY

30 West Superior Street  
Duluth, MN 55802-2093  
[www.mnpower.com](http://www.mnpower.com)



January 20, 2026

**VIA E-FILING**

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

**Re:** In the Petition for Approval of the EnergyForward Resource Package  
**Docket No. E015/M-17-568**  
**INITIAL COMMENTS**

Dear Ms. Bergman:

On December 19, 2025, Minnesota Power (or, “the Company”) submitted a Supplemental Filing in the above referenced docket communicating it terminated its Capacity Dedication Agreement (“CDA”) with South Shore Energy and would no longer be an off taker of the Nemadji Trail Energy Center (“NTEC”) Project. At the time of this filing, the NTEC Project ownership currently consists of three utility partners: ALLETE, through South Shore Energy, Dairyland Power Cooperative and Basin Electric Cooperative. In the Supplemental Filing, the Company communicated that ALLETE will continue to work with its fellow project owners to evaluate a path forward for the NTEC Project overall, but that Minnesota Power would not seek recovery of costs associated with the NTEC Project from its customers.

On January 6, 2026, the Minnesota Public Utilities Commission (“Commission”) issued a Notice of Comment Period in the above referenced docket identifying the following topics open for comment:

- Considering Minnesota Power’s December 19, 2025 letter in this docket, should the Commission rescind approval or take any other action regarding the previously approved NTEC AIAs?
- Are there other issues or concerns related to this matter?

I AM  
**ZERO INJURY.**

*Together we choose to work safely for our families, each other, and the public.  
We commit to be injury-free through continuous learning and improvement.*

The Company submits these brief comments in response to the Notice. Minnesota Power does not believe further action from the Commission on this matter is required. As noted in the December 19, 2025, Supplemental Filing, Minnesota Power will no longer receive energy or capacity from the NTEC Project and will not seek to recover associated costs from its customers.

In the past, the Commission has not taken additional action on cancelled power supply agreements, and the Company does not believe additional action is needed in this instance. For example, in 2020, Minnesota Power terminated a Power Purchase Agreement (“PPA”) with Cypress Creek Renewables for a 10 MW Blanchard Solar Project<sup>1</sup> because the project did not receive necessary permits to move forward to construction. The Company notified the Commission of the termination in the appropriate docket, and no further action was taken. The same process can be followed with this contract termination.

Minnesota Power looks forward to continuing its collaboration with stakeholders in its current Integrated Resource Plan proceeding<sup>2</sup> where broader discussions about its future power supply are currently occurring. Please contact me at (218) 355-3202 or [jjcady@mnpower.com](mailto:jjcady@mnpower.com) with any questions related to this matter.

Respectfully,

A handwritten signature in black ink, reading "Jennifer J. Cady". The signature is written in a cursive, flowing style.

Jennifer J. Cady  
*Vice President – Public Policy and  
External Affairs*

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<sup>1</sup> Docket No. E015/M-18-401.

<sup>2</sup> Docket No. E015/RP-25-127.

STATE OF MINNESOTA    )  
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COUNTY OF ST. LOUIS    )

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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I, Amy M. Honkala of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 20th day of January, 2026, I electronically filed a true and correct copy of Minnesota Power's **Initial Comments in Docket No. E015/M-17-568** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



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Amy M. Honkala