



AN ALLETE COMPANY

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August 1, 2016

VIA E-FILING

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

Re: In the Matter of a Petition for Approval of Deferred Accounting
Treatment of Costs Related to the 2016 Storm Response and Recovery
Docket No.: E015/M-16-_____

Dear Mr. Wolf:

Please find attached for filing Minnesota Power's Petition for Approval in the above-referenced matter.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

A handwritten signature in black ink that reads 'David R. Moeller'.

David R. Moeller

DRM:sr
Attach.
cc: MP's General List

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

In the Matter of a Petition for Approval of
Deferred Accounting
Treatment of Costs Related to the 2016 Storm
Response and Recovery

Docket No. E015/M-16-_____

PETITION FOR APPROVAL

SUMMARY OF FILING

Minnesota Power (“the Company”), respectfully submits this Petition to the Minnesota Public Utilities Commission (“Commission”) pursuant to Minn. Stat. §§ 216B.10 and 216B.11, and Minn. Rules 7825.0300, subp. 4, and is seeking authority to defer the retail portion of incremental non-fuel operating and maintenance (O&M) cost (including overtime internal labor) incurred due to the 2016 storm response and recovery throughout the Company’s service territory. The deferral period would be until interim rates take effect in the Company’s next general rate case.

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PETITION FOR APPROVAL

I. INTRODUCTION

Minnesota Power (“the Company”), pursuant to Minn. Stat. §§ 216B.10 and 216B.11, and Minn. Rules 7825.0300, subp. 4, is seeking authority to defer the retail portion of incremental non-fuel operating and maintenance (O&M) cost (including overtime internal labor) incurred due to the 2016 storm response and recovery throughout the Company’s service territory. The deferral period would be until interim rates take effect in the Company’s next general rate case.

1. The recent severe storms across many parts of northern Minnesota have created an emergency situation for the Company. In light of this emergency, the Company respectfully requests authorization to defer, effective July 21, 2016, the retail portion of incremental non-fuel operating and maintenance (O&M) (including incremental overtime internal labor) costs caused by this emergency that were necessary in order to restore electric service to the Company’s retail customers.

2. Minnesota Power respectfully requests the Minnesota Public Utilities Commission (Commission) to issue an order granting the Company the authority to defer the extraordinary incremental O&M costs, net of insurance recovery, associated with the 2016 storm response and recovery (“2016 Storm”) that recently took place throughout northern Minnesota, most notably in Duluth and the surrounding areas.

3. Because a large portion of the costs related to the 2016 Storm are allocated to Minnesota Power's retail customers, the Commission has a vested interest in this matter. The Company proposes that such expenses be accounted for in a deferred debit account. Expenses, which the Commission in a future rate case finds prudently incurred, could be recovered through an amortization.

4. Minnesota Power requests deferral of these incremental costs, including carrying costs at the Company's pre-tax weighted cost of capital and net of any insurance recoveries, in order to allow the Company an opportunity to recover the reasonable and prudent costs the Company is incurring and will incur as a result of this emergency.

II. PROCEDURAL MATTERS

A. General Filing Information

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. Rule 7829.1300, Minnesota Power provides the following required general filing information.

1. Summary of Filing (Minn. Rule 7829.1300, subp.1)

A one-paragraph summary accompanies this Petition.

2 Service on Other Parties (Minn. Rule 7829.1300, subp. 2)

Pursuant to Minn. Stat. § 216.17, subd. 3 and Minn. Rule 7829.1300, subp. 2, Minnesota Power eFiles the Petition on the Department of Commerce - Division of Energy Resources (“the Department”) and the Minnesota Office of the Attorney General - Antitrust and Utilities Division. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, subp. 1 is being served on Minnesota Power’s general service list.

3. Name, Address and Telephone Number of Utility (Minn. Rule 7829.1300, subp. 4(A))

Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 722-2641

4. Name, Address and Telephone Number of Utility Attorney (Minn. Rule 7829.1300, subp. 4(B))

David R. Moeller
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5. Date of Filing and Date Proposed Rate Takes Effect (Minn. Rule 7829.1300, subp. 4(C))

This Petition is being filed on August 1, 2016. The effective date is the date of the Commission’s Order or such other date as directed in the Commission’s Order. Minnesota Power

respectfully requests authority, effective July 21, 2016, to account on a deferred basis the 2016 Storm expenses.

6. Statute Controlling Schedule for Processing the Filing (Minn. Rule 7829.1300, subp. 4(D))

This Petition is made in accordance with Minn. Stat. § 216B.10, which grants the Commission jurisdiction over the accounting practices of public utilities. This statute does not prescribe a statutorily imposed time frame for a Commission decision. Furthermore, Minnesota Power's Petition falls within the definition of a "Miscellaneous Tariff Filing" under Minn. Rules 7829.0100, subp. 11 and 7829.1400, subps. 1 and 4 permitting comments in response to a miscellaneous filing to be filed within 30 days, and reply comments to be filed no later than 10 days thereafter.

7. Utility Employee Responsible for Filing (Minn. Rule 7829.1300, subp. 4(E))

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8. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 4(F))

This filing will have no immediate effect on upon Minnesota Power's base rates, but the Company would seek to recover the deferred costs in its next general rate case.

9. Service List (Minn. Rule 7829.0700)

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II. BACKGROUND INFORMATION

During the early morning hours of Thursday, July 21, 2016, a severe storm ripped through northern Minnesota, knocking down thousands of trees and power lines, and leaving over 46,000 Minnesota Power customers without power. This is the worst storm to affect the Company's electrical system in the Duluth area for at least 15 years. The impact of the storm was devastating and widespread across the region and in other parts of Minnesota Power's service territory. According to the Duluth News Tribune an estimated 75,000 customers across the Northland were without power (including customers from other utilities). Winds of over 100 mph were reported in downtown Duluth and 80 mph at the Duluth airport. An electrical outage at the City of Duluth's main water pumping station limited water for Duluth residents and many customers outside Duluth that rely on wells were without water in addition to being without power for multiple days.

With both Otter Tail Power and Xcel Energy dealing with their own recent storm cleanup events, Minnesota Power requested mutual aid from as far away as Missouri (Ameren) as well as local electric and tree contractors. These workers put in 16 hour days and required housing and food. Minnesota Power quickly mobilized to preserve the integrity of the system, including impacted transmission lines, and conducted aerial and ground assessments of the severe damage to Minnesota Power infrastructure. Roughly 300 power poles were damaged and needed to be replaced and many power lines were down. In Duluth, an estimated one-third of the City's 65,000 customers were without power the afternoon of Thursday, July 21.

By Friday morning, July 22, according to Minnesota Power's outage reporting system, about 28,000 customers were without power. At the time, Minnesota Power estimated full restoration was expected to take 3 to 4 days in the hardest hit areas of Duluth and that time period was extended in some of the hardest hit areas. Minnesota Power closely coordinated Duluth and St. Louis County officials on cleanup and restoration efforts. With the assistance of mutual aid from utilities and contractors, Minnesota Power was able to fully restore power to all but a few hundred customers by Wednesday, July 27, 2016. Further details on the response and restoration efforts will be provided in a supplemental filing when time allows for additional input

by the distribution and operation personnel directly involved and the hundreds of other employees throughout the Company that have assisted in the recovery efforts. Attached as Exhibit A is an article in the Duluth News Tribune regarding Minnesota Power's storm response.

The Company has and will continue to incur significant overtime labor and other O&M costs to restore customer's utility service, protect utility assets from further damage, and make further repairs. The Company is primarily self-insured for these types of events and preliminary estimates indicate that the incremental cost of the 2016 Storm will be significant, even assuming insurance recovery of some costs.

Thus, it is too soon to assess the extent of the damage that has been done, as the storm restoration is still ongoing and will continue even after the Company's first priority to restore electric service to approximately 46,000 customers was completed. However, it is known at this time that the Company expended approximately at least \$0.75 million daily in the first week alone in storm restoration costs, including non-fuel operating and maintenance (O&M) (including incremental overtime internal labor). In total, Minnesota Power believes the incremental costs could be approximately \$4 to \$6 million¹ though these are still very preliminary estimates. Accordingly, early estimates indicate that the incremental O&M costs associated with the 2016 Storm will be significant.

III. STANDARD OF APPROVAL OF DEFERRAL ACCOUNTING

Minnesota Power has judiciously requested deferred accounting treatment from the Commission. The Company requests deferral of its incremental O&M costs in order to allow the Company an opportunity to recover the reasonable and prudent costs the Company has incurred and will continue to incur as a result of this severe storm response.

In recent years, the Commission has decided several cases regarding deferred accounting, thereby establishing certain standards for review. In 2008, Interstate Power and Light ("IPL")

¹ Some of these costs will include capital but the exact percentages and amounts are not yet available.

requested deferred accounting of flood-related expenses related to its operations in Iowa. (Docket No. E,G001/M-08-728). In granting deferred accounting, the Commission stated that “Traditionally, deferred accounting has been reserved for costs that are unusual, unforeseeable, and large enough to have a significant impact on the utility’s financial condition. Deferred accounting has also sometimes been permitted when utilities have incurred sizable expenses to meet important public policy mandates.”² Likewise, Staff Briefing Papers noted that: The Commission has articulated considerations by which it has judged requests for deferred accounting in a number of prior dockets. The costs should be:

1. Related to utility operations for which ratepayer have incurred costs or received benefits;
2. Significant in amount;
3. Unusual or extraordinary items;
4. Subject to review for reasonableness and prudence.

In the same briefing papers, Staff included a preamble outlining the purposes of deferred accounting:

The intent of the deferral is not to match costs with benefits, but to preserve the possibility for the utility to recover costs in a future rate case that have been incurred outside the test year used to establish rates. Because the use of deferred accounting for such a purpose is an exception to normal utility ratemaking concepts and general business accounting principles, it should be used with caution.

Minnesota Power appreciates that the use of deferred accounting should be the exception to the normal ratemaking process and used with caution. The Company believes that the exceptional circumstances surrounding the 2016 Storm warrant deferred accounting treatment in

² Interstate Power and Light Company’s Petition for Approval of Deferred Accounting Treatment of Costs Related to the 2008 Flood, *Order Authorizing Deferred Accounting Treatment Subject to Certain Conditions*, Docket No. E,G-001/M-08-728 (April 23, 2009). *See also*, Xcel Energy’s Petition for Approval of Deferred Accounting for Costs Incurred for the Web Tool and Time-of-Use Pilot Project, *Order Approving Deferred Accounting*, Docket No. E002/M-03-1462 (February 25, 2005); Xcel Energy’s Petition for Approval of Deferred Accounting Treatment of Costs Related to the Mercury Emissions Reduction Act of 2006, *Order Approving Deferred Accounting of Certain Costs Attributed to Mercury Emission Reduction*, Docket No. E002/M-06-1315 (January 31, 2007); Xcel Energy’s Petition for Approval of Two Proposed Energy Innovation Corridor Projects in the Central Corridor Utility Zone and Deferred Accounting Treatment for Costs Incurred After January 1, 2010, *Order Accepting Withdrawal, Granting Deferred Accounting, and Setting Filing Requirements*, Docket No. E002/M-09-1488 (December 27, 2010).

this matter. The discussion below examines each of the deferred accounting criteria in light of the Company's present Petition.

IV. ACCOUNTING TREATMENT

At this time, no amounts have been accrued for book (Securities and Exchange Commission, "SEC") purposes relating to the 2016 storm. However, the Company will be required to recognize expenses, for book (SEC) purposes, net of insurance recovery. In short, the Company is attempting to carefully time the filing of this request, so that the request is early enough to predate any book (SEC) purposes, yet late enough to provide an indication that extraordinary, substantial and unforeseen expenses are likely. These expenditures were not contemplated in establishing current retail rates, and without deferral would significantly distort 2016 income. The use of deferred accounting may avoid the need to "write off" (expense), for book (SEC) purposes, additional liabilities when they become known. The Company requests that, upon Commission approval, the incremental expenses associated with the 2016 Storm be accumulated in FERC Account Number 186, Miscellaneous Deferred Debits. The Company proposes to begin amortizing these expenses concurrent with interim rates in its next rate case. An amortization period accepted by the Commission in that rate proceeding would be used.

V. APPROPRIATENESS OF DEFERRAL ACCOUNTING

Minnesota Power will be incurring substantial expenses as a result of the 2016 Storm. Because these costs are non-routine, substantial in size, and not representative of normal operating and maintenance expenditures and consequently could not have been foreseen and included in current rates, a deferral methodology for both accounting and ratemaking purposes is appropriate. This would be consistent with the Commission's approval for the treatment of similar expenses for IPL flooding in 2008.

(1) Related to utility operations for which customers have incurred costs or received benefits.

This criteria is clearly met given that all costs are directly related to Minnesota Power's obligation to "furnish safe, adequate efficient and reasonable service"³ to its customers within its service territory. Accordingly, these incremental costs from the 2016 Storm pertain to utility operations through which customers receive benefits and should share costs.

(2) Significant in amount.

As stated above, the total expenses associated with the 2016 Storm are not yet known. What is known is that the Company has already incurred significant incremental expenses beyond its normal distribution budget from both internal resources as well as mutual aid assistance. Preliminary estimates are that Minnesota Power has expended at least \$0.75 million daily in the first week alone in storm restoration costs, including non-fuel operating and maintenance (O&M) (including incremental overtime internal labor). In total, Minnesota Power believes the total incremental costs could be approximately \$4 to \$6 million.⁴ These numbers reflect significant adverse impacts to Minnesota Power.

(3) Unusual or extraordinary items.

The 2016 Storm with gale force winds and significant weather-related damage were sudden and caused by forces beyond the Company's control. While vegetation management and ongoing maintenance occurs as more fully described in Minnesota Power's annual Safety Reliability, Service Quality filings, the severity of the weather and the magnitude of the resultant damage are certainly outside the Company's reasonable foresight. The 2016 Storm is the worst the Duluth area has seen in over 15 years, if not longer. As widely reported in the state and national news media, the severe weather and its resulting events that have included difficult tree removals, are highly unusual and infrequent events.

³ Minn. Stat. 216B.04.

⁴ Some of these costs will include capital but the exact percentages and amounts are not yet available.

(4) Subject to review for reasonableness and prudence.

Minnesota Power offers this Petition to enable the Commission and other stakeholders to thoroughly examine the 2016 Storm recovery expenses for reasonableness and prudence. Similar to what the Department recommended and the Commission approved for IPL in Docket E,G-001/M-08-728, Minnesota Power will supplement this record as more details are available and provide annual reports until the next rate case filing on any 2016 Storm-related costs incurred and any insurance payments received and any other information as requested by the Commission. In addition, as noted in the Commission's deferred accounting orders, "under standard ratemaking principles deferred costs are not guaranteed rate recovery; they are merely deferred for later consideration as potentially recoverable. The Company still bears the burden of proving that the deferred costs are reasonable, prudent, and otherwise eligible for recovery from ratepayers."⁵ If approved by the Commission, Minnesota Power's incremental costs will be subject to review in its next general rate case.

VI. CONCLUSION

Minnesota Power respectfully requests authority, effective July 21, 2016 to account on a deferred basis for the 2016 Storm expenses caused by this emergency that were necessary to restore electric service to 46,000 Minnesota Power retail customers, for review and recovery in the Company's next general rate case.

Dated: August 1, 2016

Respectfully submitted,



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⁵ Docket No. E,G-001/M-08-728 (April 23, 2009).

8/1/2016

Minnesota Power provides behind-the-scenes look at storm response Duluth News Tribune

Minnesota Power provides behind-the-scenes look at storm response

By [Tom Olsen](#) on Jul 27, 2016 at 10:00 p.m.



Dan Gunderson, Minnesota Power's director of distribution operations, talks about the process of repairing last week's storm damage. Power lines on the map he's referring to were highlighted as they were brought back into service. Steve Kuchera / skuchera@duluthnews.com 1 / 4
2 / 43 / 44 / 4 Like many Minnesota Power employees, Stefanie Stollenwerk received a phone call shortly after 3 a.m. last Thursday.

It's not uncommon for the utility to face emergency situations and have to deploy crews at all hours. But this wasn't an ordinary emergency. It was what officials now say is the most damaging storm to hit Duluth's power grid in at least half a century.

"I've been working here 18 years and I've never seen a storm like this," said Stollenwerk, the utility's manager of transmission and distribution support services. "When I got the call, I told my husband that I wasn't sure when I was going to see him again."

For the past week, Stollenwerk and a team of Minnesota Power officials have worked around the clock at the company's Herbert Service Center on Arrowhead Road, coordinating the behind-the-

8/1/2016

Minnesota Power provides behind-the-scenes look at storm response Duluth News Tribune

scenes emergency response and power restoration efforts in Duluth, Rice Lake and many other Northland communities.

It's there that the team has gathered for regular meetings to assess damage, discuss priorities and dispatch crews, which have worked 16-hour days for the past week.

The walls of the facility are lined with large paper maps, which have allowed employees to track restoration efforts and pinpoint critical areas in recent days. In an office dubbed the "trouble room," large computer monitors display information such as outage maps and the GPS locations of crews out in the field.

Down the hall, Stollenwerk's office door holds a paper sign reading "Logistics HQ, where miracles happen." It's here that she and other employees have arranged some of the less-visible (but no-less-important) needs: meals, transportation and lodging for out-of-town lineworkers.

Those efforts have been winding down, with Minnesota Power officials saying that electricity was expected to be fully restored to all customers by 10 p.m. Wednesday — save for individual homes that may need additional repairs.

"This is the type of crisis that really brings a community together," said Amy Rutledge, a Minnesota Power spokeswoman. "There are a lot of people working together to get this community back to normal — and a big part of that is having the power on."

Storm posed unprecedented challenges

About 46,000 customers in Minnesota Power's service area — and more than 75,000 total across the Northland — lost power in the wake of last Thursday's storm..

Dan Gunderson, Minnesota Power's director of distribution operations, serves as the incident commander for major events that hit the utility's power grid.

He said it was clear from the start that the storm was going to be the most devastating event experienced by the utility in recent memory. Crews were immediately dispatched to assess damage, including a helicopter that did an aerial survey just after daybreak that morning.

"It was by far the largest we've seen in a very long time," Gunderson said. "We have employees who have been here 30, 40 years who said this is bigger than any storm they've ever seen."

Gunderson said the widespread damaged posed challenges for the utility when it came to seeking reinforcements. Minnesota Power has mutual aid agreements with surrounding utilities, but the storm left damage from the Dakotas to Wisconsin and from northern Minnesota to Iowa, keeping many neighboring crews busy with their own work.

That resulted in crews coming from as far away as Missouri. Some 400 people — including 260 lineworkers and 30 professional tree removal crews — worked throughout the week, according to Minnesota Power.

8/1/2016

Minnesota Power provides behind-the-scenes look at storm response Duluth News Tribune

From the command center, Gunderson and the team prioritized repair efforts and crew deployments.

Minnesota Power worked to initially fix major transmission lines before moving to secondary lines and individual transformers. Crews also worked to quickly restore power to the Lakewood Pumping Station, which provides drinking water to Duluth, and other essential public infrastructure such as traffic control systems.

A map of eastern Duluth hanging on the wall of Gunderson's office provides an illustration of what has been accomplished in the past week. Once black-and-white, the map now features a bright array of colors, added by the team throughout the week to highlight power lines as they have restored.

"We know how challenging this has been for customers," Gunderson said. "The dedication of these guys who have all put in 16- or 20-hour days to get everything restored is unbelievable."

From food to fuel, logistics were crucial

Down the hall, Stollenwerk and other employees have been planning some of the less-obvious details that could easily be overlooked.

That includes arranging three meals a day for crews, including a hot breakfast before heading out at daybreak.

"I feel like I've been planning a wedding reception three times a day for seven days in a row," Stollenwerk quipped.

Meanwhile, the influx of out-of-town workers — in the middle of tourism season — has posed challenges. While some are lodged at area hotels, others have been staying in the dorms at the University of Wisconsin-Superior, which volunteered its services.

Businesses also have stepped up, Stollenwerk said. Restaurants, including Valentini's and Bridgeman's, donated food and ice cream to crews battling the heat.

Stollenwerk said minor details can be overlooked without careful planning. For example, the team arranged to have trucks fueled overnight, allowing crews to maximize time in the neighborhoods. Meanwhile, a laundry service to accommodate 400 people had to be set up.

"We've tried to think of all these little things that we can do to be as productive as possible each day during our restoration efforts," she said.

Rutledge said crews also have been impressed by the community response, with residents taking the lengthy outage in stride and offering workers a cold beverage or a pat on the back.

She noted that the region's climate and terrain make it susceptible to power outages, with issues ranging from summer windstorms that topple trees to winter storms that coat lines with ice.

8/1/2016

Minnesota Power provides behind-the-scenes look at storm response Duluth News Tribune

"This isn't the first storm we've seen," she said. "We do live in northern Minnesota. This is something we plan for."

If you're still out

Officials said power should be back on throughout Minnesota Power's service area, but individual customers still may be affected. Some customers with damaged electrical masts at their homes may need to hire an electrician to make repairs before service can be restored.

Those who are still experiencing outages are asked to call (800) 30-POWER.

Gunderson said some customers may have downed or damaged lines, even if their electricity is functioning again. He encouraged residents to call if they think there may be an issue.

Gunderson said it's also typical for areas to see subsequent outages days or weeks after a major windstorm, as trees can become significantly weakened and later topple onto power lines. Minnesota Power asked that customers who see trees leaning on power lines please call the utility to report those situations.

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **1st day of August, 2016**, she served Minnesota Power's Petition for Approval of Deferred Accounting Treatment of Costs Related to the 2016 Storm Response and Recovery on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on Minnesota Power's General Service List were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
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Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List

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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List

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John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
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