

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

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In the Matter of Minnesota Power’s Petition for Approval of Modifications to its Large Power
Tariff

Docket No. E015/M-26-126

REPLY COMMENTS OF GOOGLE

May 19, 2026

Harmony Group, LLC, a subsidiary of Alphabet, Inc. (“Google”) respectfully offers the following reply comments in response to the Notice of Comment Period issued by the Minnesota Public Utilities Commission (“Commission”) on February 25, 2026 in the above referenced matter.

Google submits these Reply Comments to respond to the discussion in two Initial Comments about the interaction between Minnesota Power’s Petition Seeking Approval of a New Electric Service Agreement (“ESA”) between Minnesota Power and Google, PUC Docket No. E-015/M-26-129 (“ESA Docket”) and this docket (“LP Tariff Docket”). Specifically, the Office of the Attorney General — Residential Utilities Division (“OAG”) and the Citizens Utility Board of Minnesota (“CUB”) have suggested that a very large customer tariff for Minnesota Power should be established before the Commission acts on Google’s ESA with Minnesota Power.¹

Section 216B.1622 of Minnesota law does not require the Commission to approve a tariff

¹ See Initial Comments of the Office of the Attorney General — Residential Utilities Division, at 15–17; Initial Comments of the Citizens Utility Board of Minnesota, at 3–4.

before considering or approving an ESA for a large power customer. As further described below, the Commission should continue moving forward as scheduled in the ESA Docket.

The current schedule allows the Commission to review the ESA in full and evaluate its protections and benefits. Pursuant to the ESA and consistent with Google's policy goals, Google will cover one hundred percent (100%) of the cost of power it uses along with infrastructure needs driven by its growth. Further, Google's proposed ESA with Minnesota Power was drafted to bring many benefits to the system. Google's proposed ESA would allow fixed costs of the system to be spread more widely while also supporting the addition of new renewable energy resources to Minnesota Power's system, including 300 MW of wind energy and 400 MW of battery storage, which supports Minnesota's Carbon Free Standard ("CFS"). Minnesota Power estimates that Google's ESA with the Company is projected to bring an estimated range of \$600 million to \$800 million in benefit over the 15-year ESA contract term.

The ESA Docket was initiated in March 2026, and it would be unreasonable to delay the progression of the ESA Docket based on the comments and feedback received in this LP Tariff Docket. The ESA Docket addresses a business contract with a customer who wants to operate in Minnesota. It would be detrimental if ESA Dockets could be delayed based on disputes in generic dockets, like the LP Tariff Docket. Such a delay is particularly unreasonable as the ESA Docket addresses many of the issues raised by the intervenors and commenting parties in the LP Tariff Docket, including minimum bills, minimum contract terms, exit-fee provisions, and more.²

As discussed above, Minnesota law does not require the Commission to pause the approval of ESAs pending the resolution of this tariff docket. Under the plain language of Section 216B.1622, subd. 2 states that:

² See generally Petition, In the Matter of Petition for Approval of an Electric Service Agreement Between Google and Minnesota Power, No. 26-129, at pp. 11–18 (filed March 27, 2026).

The commission may approve, modify, or reject a tariff **or** electric service agreement proposed between a public utility and a very large customer establishing the terms and conditions under which the utility will provide electric service to the customer. As it evaluates a tariff **or** agreement under this section, the commission must consider how to achieve the following required outcomes . . .³

When interpreting statutes, the word “or” is treated as disjunctive, meaning that it separates one clause from the next.⁴ It is not unreasonable to apply section 216B.1622, subd. 2 as written. Therefore, the Commission should not grant recommendations to delay the ESA Docket pending the outcome of the LP Tariff Docket.

Dated this 19th day of May 2026.

Respectfully Submitted,

**BROWN, WINICK, GRAVES, GROSS &
BASKERVILLE, P.L.C.**

By /s/ *Haley R. Van Loon*

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³ Minn. Stat. § 216B.1622, subd. 2 (2025) (emphasis added).

⁴ *Binkley v. Allina Health Sys.*, 877 N.W.2d 547, 552 (Minn. 2016) (“We have held that the word ‘or’ should be given its ordinary meaning as a disjunctive and that the use of the word ‘or’ denotes the Legislature’s intent to separate one clause from the next.”).

CERTIFICATE OF SERVICE

I, Haley Van Loon, 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 Des Moines, Iowa.

Reply Comments of Harmony Group, LLC
Docket No. E015/M-26-126

Dated this 19th day of May, 2026.

/s/ Haley Van Loon.

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
4	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	Official 26-126
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 26-126
6	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	Official 26-126
7	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	Official 26-126
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9	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 W Superior St, Duluth, MN, 55802 Duluth MN, 54534 United States	Electronic Service		No	Official 26-126
10	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 26-126
12	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 26-126
13	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	Official 26-126
14	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN,	Electronic Service		No	Official 26-126

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