

# **LARGE POWER INTERVENORS**

## **Information Request**

Docket Numbers: E-015/RP-25-127

Date of Request: January 21, 2026

Requested From: Minnesota Power

Response Requested: February 2, 2026

By: Andrew P. Moratzka, Amber S. Lee, and Eden A. Fauré

### **Information Request No. 30**

Reference Minnesota Power Response to LPI IR No. 2.c. Please respond to LPI's question. Please 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.

### **RESPONSE:**

As explained in Minnesota Power's (or, the "Company") response to LPI IR 0031, the Company does not have a projection of all-in customer rate increases into the future. The Company provides customer impact analysis in various dockets and applications before the Minnesota Public Utilities Commission ("Commission"). These customer impacts start with a baseline that includes the current rates available at the time the filing is being prepared.

However, 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.

Secondly, the estimated customer increases in the IRPs ("Integrated Resource Plan"), rate cases, and cost recovery filings are mutually exclusive and are used for different purposes. IRPs evaluate the overall size, type and timing of resources to meet the Company's anticipated energy demand over the short- and long-term outlook period. However, IRPs do not include proposals for specific projects or project designs, which must go through a separate evaluation process with the Commission once the size, type, and timing of the overall resource need is determined through an IRP. As explained in Minnesota Power's December 18, 2025, comments filed in its Transmission Cost Recovery ("TCR") Rider (Docket No. E015/M-24-382) and Renewable Resources Rider ("RRR") (Docket No. E015/M-25-373) in response to Large Power Intervenors' December 1, 2025 comments:

The IRP rate impact from Appendix L is based on incremental power supply costs associated with anticipated future resources that will be required to meet Minnesota Power's power supply needs. The incremental costs are defined relative to the base year and represent the additional expenditure required to implement the 2025 IRP

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Response Date: 02/02/2026

Response by: Susan Ludwig

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Base Plan. By definition, this rate impact is not comparable to the rate impacts in the cost recovery riders.

Importantly, the incremental power supply costs include costs for generic projects approved in prior IRPs, when a specific project has not yet been identified. For example, the 2025 IRP included the cost for a generic wind farm that represented projects approved in the prior IRP. After the IRP was filed, Minnesota Power identified a specific project to meet that need (i.e. 200 MW Longspur wind farm); ultimately those updated costs will be captured in a more granular cost recovery filing. Conversely, the TCR and RRR are granular cost-recovery filings that look ahead just one year, include prior tracker balances, a current return on CWIP, and in-service revenue requirements.

Table 1 from Appendix L reflects the year-over-year impact of forecasted power supply costs associated with the implementation of the 2025 IRP Base Plan, regardless of whether specific projects have been submitted for cost recovery. As included in the Company's response to LPI IR 0031, Table 1 has been updated with current rates as of January 1, 2026 in LPI IR 0031.01 Attach.

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