

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Commissioner
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

May 11, 2020

**In the Matter of the Emergency Petition of
Minnesota Power for Approval to Move Asset-
Based Wholesale Sales Credits to the Fuel
Adjustment Clause and Resolve Rate Case**

Docket No. E-015/M-20-429

**INITIAL COMMENTS OF FRESH ENERGY, MINNESOTA CENTER FOR
ENVIRONMENTAL ADVOCACY, SIERRA CLUB, AND CLEAN GRID ALLIANCE**

Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Clean Grid Alliance (“CEOs”) submit these Initial Comments in response to the Commission’s April 28, 2020 Notice of Shortened Comment Period.

CEOs do not oppose the withdrawal of the 2019 rate case under the conditions in the Company’s Petition. The withdrawal of the rate case would avoid harmful residential rate design changes proposed by the Company, such as the fixed service charge increase and the transition to a flat rate structure. Instead, residential rate design issues would be addressed in Docket 12-233.

Rate design provides an opportunity to reduce dependence on fossil-fuels, empower customers, and reduce electricity costs for all. We look forward to working with Minnesota Power and other parties in the Docket 12-233 to accomplish these objectives.

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