

July 1, 2024

PUBLIC DOCUMENT

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce**
Docket No. E015/AA-24-64

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Minnesota Power's Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2025 through December 2025

Minnesota Power filed the Petition on May 1, 2024.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve Minnesota Power's 2025 Fuel Forecast and resulting forecasted rates, subject to a subsequent true-up, pending results of the MISO Planning Resource Auction provided by Minnesota Power in Reply Comments.**

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Energy Regulatory Analysis

AG/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E015/AA-24-64

I. INTRODUCTION

On May 1, 2024, Minnesota Power (MP or the Company) filed its *Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2025 through December 2025* (Fuel Report). Minnesota Power made its Fuel Report to comply with the decisions the Minnesota Public Utilities Commission (Commission) rendered in its June 12, 2019 [Order](#) in Docket No. E999/CI-03-802 and in compliance with [Minnesota Rules](#) 7825.2800 to 2825.2840 governing Automatic Adjustment of Charges.

II. BACKGROUND

[Minnesota Statutes § 216B.16](#), subd. 7, authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel in certain circumstances.

On May 1, 2023, Minnesota Power filed its [2024 Forecasted Fuel and Purchased Energy Report](#) for approval of 2024 fuel rates in Docket No. E015/AA-23-180. On November 9, 2023, the Commission issued its [Order](#) approving the following:

1. Approved Minnesota Power's Annual Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024, subject to a subsequent true-up.
2. Required Minnesota Power to make a compliance filing with a redlined and clean version of the Fuel and Purchased Energy Rider Tariff sheet with 10 days of the Commission's Order.
3. Authorized Minnesota Power to implement its Revised 2023 FCA forecast, based on forecasted sales of 8,815,400 kWh and forecasted fuel costs of \$294,446,791.
4. Required Minnesota Power to make a compliance filing with redlined and clean versions of the Fuel and Purchased Energy Rider Tariff sheet with supporting calculations, within 10 days of the date of this for implementation effective January 1, 2023.
5. Delegated authority to the Executive Secretary to approve the contents of any subsequent customer notice and rate schedule in this proceeding.
6. Ordered Minnesota Power to file a revised 2023 forecast that incorporates 2023/2024 MISO Planning Resource Auction credit/revenue, if applicable, once results are known, and incorporate them into rates the first of the month following the revised 2023 forecast filing, waving the 30-day notice under a significant event filing.

In its June 30, 2020 [Order](#), the Commission approved Minnesota Power's April 23, 2020 [Petition](#) and proposal in Docket No. E015/M-20-429. The Commission's June 30, 2020 [Order](#) resolved Minnesota Power's 2019 Rate Case by recalculating base rates based on costs established in the 2016 rate case, except for asset-based margins that were moved to the FCA.

For additional background on Minnesota Power's Annual Forecasted Fuel and Purchased Energy Rates filings, see Department Attachment 1.

III. ANNUAL COMPLIANCE/REPORTING REQUIREMENTS

The Department identified the following five compliance filings (parts A to E below) and four Minnesota Rule Requirements (part F below) applicable to Minnesota Power. As noted above, three of the compliance filings were addressed in Minnesota Power's Forecast Report (with some additional information to be provided in Minnesota Power's True-Up Report) and the other two compliance filings will be addressed in Minnesota Power's True-Up Report. The Department notes the Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03-802, ordering point 7, approved reporting requirements for Minnesota Power of the Forecast and True-Up Reports as provided in Attachment 1 of the Department's March 1, 2019 [Joint Comments](#). Minnesota Power provided the applicable Attachment 1 reporting requirements information in its Forecasting Report.

A. Plant Outages Contingency Plans: In the Matter of the Review of the 2008 Annual Automatic Adjustment Reports for All Electric Utilities, Docket No. E999/AA-08-995

Minnesota Power provided its Outage Methodology and Forecasted Planned and Forced Outage Costs (Attachment No. 5 of the Company's 2025 Fuel Forecast Report).

B. Sharing Lessons Learned Regarding Forced Outages: In the Matter of the Review of the 2009-2010 Annual Automatic Adjustment Reports for All Electric Utilities, Docket No. E999/AA-10-884

Minnesota Power provided Outage Methodology and Forecasted Planned and Forced Outage Costs (Attachment No. 5 of the Company's 2025 Fuel Forecast Report).

C. In the Matter of a Petition by Minnesota Power for Approval of a Power Purchase Agreement with Manitoba Hydro, Report on Purchased Power Agreement (PPA) with Manitoba Hydro, Docket No. E015/M-10-961

Minnesota Power in [Reply Comments](#) in its 2023 Fuel Forecast true-up in Docket No. E015/AA-22-216 stated the agreement executed with Manitoba Hydro expired April 30, 2022 and requested the Commission remove the reporting requirements relating to Manitoba Hydro in future reports.¹ At the June 27, 2024 Commission agenda meeting, the Commission approved the Company's request. As such, the Company need not submit this information the Instant Docket, nor in similar filings going forward.

¹ Minnesota Power May 1, 2024 Reply Comments in Docket No. E015/AA-22-216.

D. Self-Scheduling Reporting for Xcel, Minnesota Power, and Otter Tail Power as required by the Commission's February 7, 2019 Order in Docket No. E999/AA-17-492

Minnesota Power's self-scheduling report was filed on [March 1, 2024](#) in Docket No. E999/CI19-704.

E. MISO Day 2 Charges and Allocations & Auction Revenue Rights (ARR) Process and forecasted Information

Minnesota Power provided the MISO [Midcontinent Independent System Operator] Day 2 and ARR Information as required by Docket No. E999/AA-07-1130 and Docket No. E015/M-05-277, respectfully, in Attachment Nos. 3 and 4 of Minnesota Power's 2025 Fuel Forecast Report.

F. Minnesota Rule Requirements:

1. Fuel and Energy Source Procurement and Energy Dispatching Policies ([Minnesota Rules 7825.2800](#)):

Attachment No. 2 of Minnesota Power's 2025 Fuel Forecast Report.

2. Forecast of Annual Automatic Adjustment Charges ([Minnesota Rules 7825.2810](#)):

Minnesota Power provided the forecasted annual automatic adjustment charges for the period January to December 2025. Included is a breakdown by energy type as required in Docket No. E,G999/AA-04-1279, Commission [Order](#) Dated December 7, 2005. See Attachment No. 1 of Minnesota Power's Fuel Forecast Report.

3. Annual Five-Year Projection of Fuel Costs ([Minnesota Rules 7825.2830](#)):

Attachment No. 6 of Minnesota Power's 2025 Fuel Forecast Report.

4. Annual Notice of Reports Availability ([Minnesota Rules 7825.2840](#)):

Attachment No. 7 of Minnesota Power's 2025 Fuel Forecast Report.

G. Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments – Compliance Filings and Amending Initial Annual Filing Requirements as required by the Commission's March 12, 2024 Order in Docket No. E999/CI-03-802

Minnesota Power provided the following information required by the Commission Order:

- Most recent three-year average of actual annual data compared to forecast for the FCA calculation components (Attachment 1), generation costs (Attachment 1), purchase costs (Attachment 1), inter-system sales (Attachment 1), and outages (Attachment 5);
- Attachment addressing costs related to MISO in Attachment 3;
- Attachment to its annual FCA true-up filing addressing charges related to MISO’s ancillary service market in Attachment 3.

The Department recommends the Commission accept Minnesota Power’s compliance filings and reporting requirements.

IV. SALES FORECAST FOR 2025

The following table compares Minnesota Power’s 2024 Forecasted Sales (MWh)² and 2025 Forecasted Sales (MWh)³.

Table 1: 2024 and 2025 Forecasted Sales (MWh)

	2024 Forecast	2025 Forecast	Change in MWh	Percent Change
Total Sales of Electricity	12,397,514	12,710,739	313,225	2.53%
Residential	1,045,140	1,040,641	-4,499	-0.43%
Commercial	1,230,613	1,202,801	-27,812	-2.26%
LP Taconite	3,794,988	4,190,960	395,972	10.43%
LP Paper and Pulp	599,802	601,791	1,989	0.33%
LP Pipeline	310,455	321,073	10,618	3.42%
Other Misc.	333,861	318,858	-15,003	-4.49%
Municipals	1,313,471	1,378,882	65,411	4.98%
Inter System Sales	3,769,185	3,655,733	-113,452	-3.01%
Less: Inter System Sales	3,769,185	3,655,733	-113,452	-3.01%
Customer Inter System Sales	940,132	1,011,240	71,108	7.56%
Market Sales	2,826,652	2,640,408	-186,244	-6.59%
Station Generation Service	2,401	4,085	1,684	70.14%
Sales due to Retail Loss of Load	-	-	-	-
Less: Solar Generation & Purchases	55,492	57,106	1,614	2.91%
Total Fuel Clause Sales	8,572,838	8,997,900	425,062	4.96%

² Minnesota Power’s [Petition](#), page 6 in Docket No. E015/AA-23-180.

³ Petition, pages 6-7.

Minnesota Power's total sales forecast for 2025 compared to 2024 shows increased total sales forecasted year over year, which is largely driven by higher Large Power Taconite Sales and lower market sales. This also results in the Company forecasting higher Total Fuel Clause Sales for 2025 compared to 2024. Minnesota Power in its forecast assumptions explains that it estimates "mining customers operating at levels reflective of 35 million dry tax tons"⁴ for its 2025 forecast compared to approximately 32 million in its 2024 forecast, contributing to the increase in sales.⁵

Minnesota Power reported it continues to use the RTSim production cost model for budgeting and planning purposes and, in this proceeding, to estimate the monthly fuel costs. According to the Company:

The RTSim model is a detailed hourly simulation that dispatches generation to meet customer load requirements, while simultaneously factoring in bilateral contracts and the energy market and assigns the appropriate energy costs to customers. The inputs that drive the model include customer loads, forecasted forward energy prices, contract energy purchases and sales, and generation parameters (i.e., fuel costs, maintenance schedules, etc.). The model's output includes the energy and costs for thermal generation, hydro generation, wind generation, bilateral contracts, and MISO market purchases and sales.⁶

For forward energy prices, Minnesota Power uses the forward energy price outlook. The 2025 energy price outlook is based on a 10-business-day average of forward market energy price at close from January 29, 2024 through February 9, 2024. For 2024, the on-peak average was **[TRADE SECRET DATA HAS BEEN EXCISED]** while the off-peak average was **[TRADE SECRET DATA HAS BEEN EXCISED]**.⁷

As part of its review, the Department compared Minnesota Power's 2025 sales forecast to 2021 to 2023 actual sales (three most recent years of actuals) and three-year average for 2021 to 2023, now part of the annual FCA filing as required by the Commission's March 12, 2024 Order in Docket No. E999/CI-03-802. This information is reproduced in the table below:

⁴ Petition, Attachment No. 1, Page 3.

⁵ Docket No. E015/AA-23-180, [Department Comments](#) dated June 30, 2023, Attachment 2.

⁶ Petition, Attachment No. 1, page 2.

⁷ Petition, Attachment No. 1, page 2.

Table 2: Minnesota Power’s 2021 to 2023 Actual Sales Compared to 2025 Sales Forecast per MWh⁸

	2021 Actuals	2022 Actuals	2023 Actuals	2021-2023 Average	2025 Forecast
Total Sales of Electricity	14,566,917	12,948,280	12,796,580	13,437,259	12,710,739
Residential	1,043,665	1,063,695	1,013,751	1,040,370	1,040,641
Commercial	1,174,413	1,181,292	1,179,547	1,178,417	1,202,801
LP Taconite	4,428,819	4,297,541	4,410,110	4,378,823	4,190,960
LP Paper and Pulp	489,259	490,030	533,667	504,319	601,791
LP Pipeline	341,031	305,030	336,125	327,395	321,073
Other Misc.	341,353	341,716	355,881	346,317	318,858
Municipals	1,393,315	1,299,049	1,338,625	1,343,663	1,378,882
Inter System Sales	5,355,063	3,969,927	3,628,874	4,317,955	3,655,733
Less: Inter System Sales	5,355,063	3,969,927	3,628,874	4,317,955	3,655,733
Customer Inter System Sales	1,067,722	820,924	809,093	899,246	1,011,240
Market Sales	3,412,055	3,140,614	2,812,719	3,121,796	2,640,408
Station Generation Service	6,126	8,390	7,063	7,193	4,085
Sales due to Retail Loss of Load	869,160	-	-	289,720	-
Less: Solar Generation & Purchases	17,215	16,112	38,441	23,923	57,106
Total Fuel Clause Sales	9,194,640	8,962,240	9,129,265	9,095,382	8,997,900

Minnesota Power provided its customer sales assumptions in Petition Attachment No. 1, pages 3 and 4. Based on the Department’s review of the Company’s actual sales for 2021 through 2023, the three-year average from 2021 through 2023, and 2025 sales assumptions, the Department notes Minnesota Power’s 2025 sales forecast for retail sales are similar to the most recent 2023 actuals and three-year average for 2021 through 2023. However, Minnesota Power had higher inter system sales in 2021 from sales due largely to retail loss of load, which drove up the three-year average, and accounts for most of the difference between the 2025 forecast and the 2021 through 2023 three-year average. Total fuel clause sales for 2025 forecast are slightly higher, but generally in line with prior years and the three-year average.

Overall, the Department recommends the Commission accept Minnesota Power’s 2025 sales forecast to set FCA rates for 2025, as total fuel clause sales are slightly higher, and close to 2023 actuals and the three-year average for 2021 through 2023. The Department notes Minnesota Power’s FCA revenues and costs are subject to true-up in the 2025 True-Up Report. The Department also notes our

⁸ Petition, Attachment No. 1, Page 11.

recommendation in this docket should not be used in Minnesota Power’s rate cases or other rate proceedings, where a more thorough review of the Company’s sales forecast will occur.

V. FORECASTED AUTOMATIC ADJUSTMENT CHARGES FOR 2025

Minnesota Power provided its Forecasted Fuel Cost Summary on page 6 of its Petition and more detailed information in Petition, Attachment No. 1, p. 10. Table 3 provides Minnesota Power’s 2025 Forecasted Fuel Cost Summary,⁹ which includes wholesale asset-based margins, and excludes fuel costs for inter system sales.

Table 3: 2024 Forecast Fuel Cost Summary

	2025 Forecast
Company’s Generating Stations	\$131,822,689
Plus: Purchased Energy	\$228,880,278
Plus: MISO Charges	\$39,304,154
Less: MISO Sch. 16, 17, and 24	\$(306,699)
Less: Cost Recovered through Inter System Sales	\$132,731,488
Less: Costs Related to Solar	\$2,597,138
Plus: Time of Generation and Solar Energy Adjustment	\$1,387,347
Total Cost of Fuel	\$266,372,540
Total Fuel Clause Sales (MWh)	8,997,900
Average Cost of Fuel (¢/kWh)	2.955

The Department reviewed Minnesota Power’s actual fuel costs from 2021 to 2023, by year, three-year average of 2021 to 2023 actuals, and 2025 forecast as now required as part of the annual FCA filing by the Commission’s March 12, 2024 Order in Docket No. E999/CI-03-802. Table 4 provides this information.

⁹ Petition, Page 6.

Table 4: 2021 to 2023 Actuals and 2021-2023 Three Year Average Compared to 2025 Forecasted Fuel Cost Summary per \$/MWh¹⁰

	2021 Actuals	2022 Actuals	2023 Actuals	2021-2023 Average	2025 Forecast
Company's Generating Stations	\$111,316,951	\$130,269,082	\$120,798,378	\$120,794,804	\$131,822,689
Plus: Purchased Energy	\$302,780,486	\$262,867,849	\$255,150,291	\$273,599,542	\$228,880,278
Plus: MISO Charges	64,223,807	\$59,750,884	\$24,240,451	\$49,405,048	\$39,304,154
Less: MISO Sch. 16, 17, and 24	\$(79,627)	\$(406,916)	\$(434,364)	(\$306,969)	\$(306,699)
Less: Cost Recovered through Inter System Sales	\$160,780,204	\$167,749,176	\$129,080,438	\$152,536,606	\$132,731,488
Less: Costs Related to Solar	\$1,366	\$83	\$1,354,052	\$451,834	\$2,597,138
Plus: Time of Generation and Solar Energy Adjustment	\$386,358	\$440,270	\$1,191,444	\$672,690	\$1,387,347
Total Cost of Fuel	\$318,005,659	\$285,985,742	\$271,380,438	\$291,790,613	\$266,372,540
Total Fuel Clause Sales (MWh)	9,194,640	8,962,240	9,129,265	9,095,382	8,997,900
Average Cost of Fuel	\$34.59	\$31.91	\$29.73	\$32.08	\$29.60

The Company's forecasted cost of fuel is similar to its 2023 actuals, although some differences are present across different categories, and lower than the three-year 2021 through 2023 average. Its 2025 forecast is lower than any actuals from 2021 through 2023. Purchased energy costs in the 2025 forecast are down significantly from 2023 as a result of increased generation offsetting energy purchases, resulting in fewer MWh of energy purchased and resultant lower purchased power costs. MISO Charges, discussed later in the Instant Comments, and Costs recovered from Inter System Sales are both up from 2023, but down from significantly from 2021 and 2022 levels. Solar costs are up due to higher forecasted solar generation and increased contract prices.¹¹

Table 4 shows the average cost of fuel for the 2025 is 7.72% lower than the three-year average of 2021 through 2023 actuals, and 0.41% lower than 2023 actuals. Overall, based on the additional information Minnesota Power provided, the Department considers Minnesota Power's 2025 fuel forecast to be reasonable.

The Department recommends the Commission approve Minnesota Power's 2025 Fuel and Purchased Energy Forecast for setting initial FCA rates in this proceeding, subject to a true-up.

¹⁰ Petition, Attachment No. 1, Page 11.

¹¹ Petition Attachment 1, Page 12.

VI. FORECASTED COMPANY OWNED GENERATION BY FUEL TYPE AND LOCATION

The Department reviewed Minnesota Power’s company-owned generation costs, by facility, for 2021 to 2023, by year, three-year average of 2021 to 2023 actuals, and its 2025 forecast as now required as part of the annual FCA filing by the Commission’s March 12, 2024 Order in Docket No. E999/CI-03-802. Table 5 provides this information.

Table 5: Company Owned Generation – 2021 to 2023 Actuals, 2021 to 2023 Three-Year Average, and 2025 Forecast¹²

Company Owned Generation	2021 Actuals	2022 Actuals	2023 Actuals	2021-2023 Average	2025 Forecast
Coal					
Boswell 3	\$46,778,306	\$52,242,979	\$53,904,679	\$50,975,321	\$49,397,131
Boswell 4	\$53,449,013	\$57,234,785	\$58,342,766	\$56,342,188	\$67,769,780
Gas					
Laskin 1	\$3,542,131	\$6,306,886	\$2,355,052	\$4,068,023	\$3,543,752
Laskin 2	\$3,287,399	\$6,961,890	\$1,915,269	\$4,054,853	\$3,491,045
Biofuel					
Hibbard	\$4,260,102	\$7,522,542	\$4,280,613	\$5,354,419	\$7,620,980
Wind					
Bison	\$0	\$0	\$0	\$0	\$0
Tac Ridge	\$0	\$0	\$0	\$0	\$0
Hydro					
Hydro	\$0	\$0	\$0	\$0	\$0
Total Company Generation	\$111,316,951	\$130,269,082	\$120,798,378	\$120,794,804	\$131,822,689
MWh	[TRADE SECRET DATA HAS BEEN EXCISED]				
Total Company Owned Generation per MWh					

Minnesota Power’s assumptions for its Company-owned generation are found in Attachment 1, pages 4 through 6. Based on the Department’s review of Minnesota Power’s owned generation assumptions, we consider the Company’s assumptions to be reasonable.

¹² Petition, Attachment No. 1, Page 15.

As noted above, the Company is forecasting increased generation for 2025, resulting in increased generation costs for 2025 compared to 2023 actuals and the three-year average. As shown in its Petition, [TRADE SECRET DATA HAS BEEN EXCISED] ¹³

The Department considers Minnesota Power’s 2025 owned generation forecast reasonable for the purposes of setting initial FCA rates in this proceeding, subject to the subsequent true-up.

VII. PURCHASED ENERGY – LONG TERM PPAS

Minnesota Power forecasted purchased energy of \$228,880,278 for 2025.¹⁴ The Company provided details of purchase costs in Petition, Attachment No. 1, pages 21 and 22, as now required as part of the annual FCA filing by the Commission’s March 12, 2024 Order in Docket No. E999/CI-03-802. Table 6 provides this information.

Table 6: Purchased Energy – Long-Term PPAs for 2020 to 2022 Actuals, 2020 to 2022 Three-Year Average, and 2024 Forecast¹⁵

Purchased Energy	2021 Actuals	2022 Actuals	2023 Actuals	2021-2023 Average	2025 Forecast ¹⁶
Coal – Square Butte	\$33,604,104	\$30,080,957	\$36,731,373	\$33,472,145	\$37,998,456
Hydro – MHEB	\$102,549,433	\$115,956,880	\$115,566,245	\$111,357,519	\$103,054,756
Wind	\$27,678,338	\$32,536,121	\$28,378,595	\$29,531,018	\$28,970,428
Solar	\$1,367	\$137,350	\$1,576,111	\$571,609	\$2,808,734
Market	\$138,947,245	\$84,156,541	\$72,897,968	\$100,137,211	\$56,047,904
Total	\$302,780,486	\$262,867,849	\$255,150,291	\$275,069,502	\$228,880,278

Minnesota Power’s assumptions and contract information for purchased energy costs are found in Petition Attachment 1, pages 6 and 7. The Company provides some explanations for variances in its forecast from prior year actuals. Solar is up due to higher forecasted generation and increased prices due to contract price increases, while coal is also up due to increased forecasted fuel costs.¹⁷

Based on the Department’s review of Minnesota Power’s assumptions and contract information for purchased energy, we consider this information to be reasonable. The Department notes the Company’s 2025 forecast has lower market purchases and appears reasonable, when compared to 2021 through 2023 actuals, and the 2021 through 2023 three-year average.

¹³ Petition Attachment 1, Page 15.

¹⁴ Petition, Page 6.

¹⁵ Petition, Attachment No. 1, Pages 20-22.

¹⁶ Petition, Attachment 1, Pages 14-15.

¹⁷ Petition Attachment 1, Page 12.

The Department recommends the Commission accept Minnesota Power’s purchased energy forecast for setting initial FCA rates in this proceeding, subject to the subsequent true-up.

VIII. MISO ENERGY MARKET (MISO DAY 2) AND ANCILLARY SERVICES MARKET

Minnesota Power forecasts MISO Market Charges of \$39,304,154 for 2025.¹⁸ Minnesota Power provides MISO Day 2 Charges and Allocations in Petition, Attachment No. 3. The following table summarizes the Total Net MISO Charges (MISO Day 2 and ASM) included in Minnesota Power’s 2025 Fuel and Purchased Energy Forecast. The table also provides the allocation of MISO charges between retail and municipal sales on a per-MWh basis.

Table 7: 2025 Forecasted Net MISO Charges

Total Net MISO Charges		
MISO Market Purchases ¹⁹		\$27,073,437
MISO Cost – Other than Energy ²⁰		\$39,304,154
MISO Costs Recovered through Inter-System Sales (Market Sales) ²¹		\$(4,957,940)
MISO Costs Recovered through Inter-System Sales (Customer Sales) ²²		\$(39,160,281)
MISO Market Sales ²³		\$(33,671,913)
Net Total MISO Charges		\$(11,412,543)
Allocation of Net MISO Charges		
Retail Sales (in MWh) ²⁴	7,619,018	\$(9,663,629)
Municipal Sales (in MWh) ²⁵	1,378,882	\$(1,748,914)
Total FCA Sales	8,997,900	\$(11,412,543)

Minnesota Power’s Net MISO charges for its 2024 forecast was a \$6.8 million revenue credit, which was lower than the prior year due to a decrease in MISO Market Sales.²⁶ The Company’s Net MISO Charges for its 2025 forecast is an \$11.4 million revenue credit, which is a \$4.65 million increased revenue credit from the 2024 forecast. The increased credit from the 2024 forecast is primarily due to \$14.2 million less in MISO charges, even while market purchases rose by \$7.15 million from the 2024 to 2025 forecast.

¹⁸ Petition, Page 6.

¹⁹ Petition, Attachment 1, Page 16 under “Market Purchase” Total.

²⁰ Petition, Attachment 1, Page 10 under “Plus: MISO Charges” Total.

²¹ Petition, Attachment 1, Page 10 under “MISO Costs” Total.

²² Petition, Attachment 1, Page 10 under “Customer Inter-System Sales” Total.

²³ Petition, Attachment 1, Page 23 under “Miso Market Sales” Total.

²⁴ Petition, Attachment 3, Page 16 under FPE Retail Mwh Grand Total.

²⁵ Petition, Attachment 3, Page 16 under FAC Resale Mwh Grand Total

²⁶ Docket No. E015/AA-23-180, [Department Comments](#) dated June 30, 2023, Page 12.

The Department concludes the Company's MISO Day 2 and ASM costs and revenues included in the 2025 forecast appear reasonable. The Department recommends the Commission accept Minnesota Power's MISO Day 2 and ASM costs and revenues included in the 2025 forecast for the purpose of setting initial FCA rates in this proceeding, subject to a subsequent true-up.

IX. ASSET-BASED MARGINS

The Commission approved Minnesota Power's petition to move asset-based margins from base rates in the rate case to the fuel clause adjustment in Docket Nos. E015/GR-19-442 and E015/M-20-429 in its [Order](#) dated June 12, 2020. As provided by Minnesota Power:

Minnesota Power uses a RTSim production cost model to determine when a sale is an asset-based sale. The margins from these sales are included in the FAC Calculation (Attachment 1 – 2024 FAC Forecast Calculation) per the Rate Case Resolution Docket Nos. E015/GR-19-442 and E015/M-20-429. The margin from the Municipal Incremental Sale is also included in the Asset Based Sales Margins.²⁷

For 2025, Minnesota Power forecasted \$0 in non-MISO asset-based costs.²⁸ As provided in Minnesota Power's Petition Attachment No. 1, p. 8 of 18 in Minnesota Power's assumptions, "For 2025, no asset based sales to a counterparty have been forecasted."

For 2025, Minnesota Power forecasted \$33,671,913 in MISO Market Sales, which assumes **[TRADE SECRET DATA HAS BEEN EXCISED]**.²⁹ Minnesota Power uses the RTSim production cost model to determine the volume and cost for MISO market sales. The Company states, "when excess energy is available and it's economical, the model will sell the excess energy into the MISO market."³⁰ The Department reviewed Minnesota Power's inputs and outputs for the RTSim and found the assumptions to be reasonable.

The Department concludes the Company's asset-based margins in the 2025 forecast appear reasonable. The Department recommends the Commission accept Minnesota Power's asset-based margins in the 2025 forecast for the purpose of setting initial FCA rates in this proceeding, subject to a subsequent true-up.

X. OUTAGE COSTS – FORCED AND PLANNED

Minnesota Power's Attachment No. 5 explains the Company's planned and unplanned outage methodology. For Boswell Units 3 and 4, planned outages are based on Original Equipment Manufacturer (OEM) guidelines. For unplanned outages:

²⁷ Petition, Attachment 1, Page 9.

²⁸ Petition, Attachment 1, Page 23.

²⁹ Petition, Attachment 1, Page 23.

³⁰ Petition, Attachment 1, Page 9.

Minnesota Power utilizes the average of the previous ten years of the NERC [North American Electric Reliability Corporation] Generating Availability Data System (“GADS”) Equivalent Unplanned Outage Factor (“EUOF”) to calculate [sic] unplanned outages. The EUOF is the percent of hours during the year (given period) the unit was in an unplanned outage. The ten-year average ensures one good or bad year does not over- or under-state forecasted unit performance.³¹

Minnesota Power provided forecasted and actual outage costs for 2021 through 2023, as now required as part of the annual FCA filing by the Commission’s March 12, 2024 Order in Docket No. E999/CI-03-802, shown in the following table.

Table 8: Comparison of Forecasted and Actual Forced and Planned Outage Costs for 2021 to 2023 Fuel Forecasts with 2025 Forecast (all figures in \$)³²

Outage Incremental Costs	2021		2022		2023		2021-2023 Average		2025 Forecast
	Forecasted	Actual	Forecasted	Actual	Forecasted	Actual	Forecasted	Actual	
Planned Outage	(2,869,832)	6,415,192	(1,635,238)	2,697,271	2,843,515	425,645	(553,852)	3,179,369	[TRADE SECRET DATA HAS BEEN EXCISED]
Forced Outage	(633,962)	3,384,320	(842,438)	9,598,118	7,514,340	6,352,244	2,012,647	6,444,984	
Total	(3,503,794)	9,799,512	(2,477,676)	12,295,389	10,357,855	6,777,889	1,458,795	9,624,263	

³¹ Petition, Attachment 5, Page 3.

³² Petition, Attachment 5, Page 10.

The following table compares the Company’s forecast to actual incremental costs for planned outages in 2021 through 2023.

Table 9: Comparison of Forecast and Actual Planned Outage Incremental Costs

Incremental Costs	2021	2022	2023
Forecasted	\$(2,869,832)	\$(1,635,238)	\$2,843,515
Actual	\$6,415,192	\$2,697,271	\$425,645
Difference	\$9,285,024	\$4,332,509	\$(2,417,870)

Minnesota Power included planned outages, based on its long-term planned outage schedule, shown in the following table:

Table 10: Planned Outages 2025³³

Unit	Start Time	End Time	Duration (Days)	MISO #	Reason
Boswell 3	[TRADE SECRET DATA HAS BEEN EXCISED]				
Boswell 4					
Boswell 3					
Boswell 4					

The following table shows the unplanned outage information Minnesota Power provided.

Table 11: Unplanned Outages³⁴

Generation Specifications			
	Econ Min	Econ Max	EUOF ³⁵
Boswell Unit 3	75 MW	350 MW	7.8%
Boswell Unit 4	185 MW	580 MW	10.6%

Minnesota Power’s 2025 forecast of unplanned outages (MWhs) is **[TRADE SECRET DATA HAS BEEN EXCISED]** than 2023 actual unplanned outages and **[TRADE SECRET DATA HAS BEEN EXCISED]** than the 2021 – 2023 average of actual unplanned outages (MWhs).³⁶ Minnesota Power explained the differences are due to outages in its Bosewll 4 units in 2022 and 2023 related to a Turbine Generator Bearing Repair and a Turbine/Generator trip repair outage, respectively.³⁷

³³ Petition, Attachment 5, Page 6.

³⁴ Petition, Attachment 5, Page 7.

³⁵ The Equivalent Unplanned Outage Factor (“EUOF”) is based on a 10-year average.

³⁶ Petition, Attachment 5, Page 9.

³⁷ Ibid.

Generally, the Department considers the information supportive of Minnesota Power’s 2025 forecast for planned and forced outage costs. The Department recommends the Commission accept the Company’s 2025 forecast for planned and forced outage costs, subject to a subsequent true-up.

XI. MISO PLANNING RESOURCE AUCTION REVENUES

The Company did not include in its filing the results of the MISO Planning Resource Auction (PRA). The Department requests the Company provide in its Reply Comments, the Planning Resource Auction results.

XII. PROPOSED FORECASTED RATES AND TARIFF

Minnesota power proposes the following monthly forecasted rates to be implemented January 1, 2025.

Table 12: Proposed Monthly Forecasted Rates (¢/kWh)³⁸

Jan.	Feb.	March	April	May	June	July	Aug.	Sep.	Oct.	Nov.	Dec.
3.262	3.105	2.821	2.817	2.804	2.722	3.019	3.192	2.952	2.811	2.773	3.186

The Department recommends the Commission approve the proposed monthly forecasted rates and require Minnesota Power to make a compliance filing with redlined and clean versions of the Fuel and Purchased Energy Rider Tariff sheet with supporting calculations, within 10 days of the date of the Order for implementation effective January 1, 2025.

XIII. RECOMMENDATIONS

For Minnesota Power’s Annual Forecast of Automatic Adjustment Charges for the period of January 2025 through December 2025, the Department recommends the Commission accept Minnesota Power’s filing, subject to a subsequent true-up, pending Minnesota Power providing in Reply Comments the results of the MISO Planning Resource Auction and its impact, if any, on the 2025 FPE Forecast.

The Department further recommends the Commission approve the proposed monthly forecasted rates and require Minnesota Power to make a compliance filing with redlined and clean versions of the Fuel and Purchased Energy Rider Tariff sheet with supporting calculations, within 10 days of the date of the Order for implementation effective January 1, 2025.

Outages Costs – Forced and Planned:

Generally, the Department considers the information supportive to Minnesota Power’s 2025 forecast for planned and forced outage costs. The Department recommends the Commission accept the Company’s 2025 forecast for planned and forced outage costs, subject to a subsequent true-up.

³⁸ Petition, Page 7.

Annual Compliance/Reporting Requirements:

The Department recommends the Commission accept Minnesota Power's compliance filings and reporting requirements.

2025 Sales Forecast:

The Department recommends the Commission accept Minnesota Power's 2025 sales forecast to set FCA rates for 2025 as they are close to the three-year average of 2021 to 2023. The Department notes Minnesota Power's FCA revenues and costs are subject to true-up in the 2025 True-up Report.

2025 Forecasted Automatic Adjustment Charges Summary:

The Department recommends the Commission approve Minnesota Power's 2025 Fuel and Purchased Energy Forecast for setting initial FCA rates in this proceeding, subject to a true-up.

Forecasted Company Owned Generation by Fuel Type and Location:

The Department considers Minnesota Power's 2025 forecasted generation reasonable. The Department recommends the Commission accept Minnesota Power's Forecasted Company Owned Generation by Fuel Type and Location.

Purchased Energy – Long-term PPAs:

The Department considers Minnesota Power's purchased energy 2025 forecast reasonable. The Department recommends the Commission accept Minnesota Power's Purchased Energy 2025 forecast.

MISO Energy Market (MISO Day 2) and Ancillary Services Market (ASM):

The Department concludes the Company's MISO Day 2 and ASM costs and revenues included in the 2025 forecast appear reasonable. The Department recommends the Commission accept Minnesota Power's MISO Day 2 and ASM costs and revenues included in the 2025 forecast for the purpose of setting initial FCA rates in this proceeding, subject to a subsequent true-up.

Asset-Based Margins:

The Department considers Minnesota Power's forecast for asset-based margins reasonable. The Department recommends the Commission accept the Minnesota Power's asset-based margins in the 2025 forecast for the purpose of setting initial FCA rates in this proceeding, subject to a subsequent true-up.

MISO Planning Resource Auction Revenues:

The Company did not include in its filing the results of the MISO Planning Resource Auction (PRA). The Department requests the Company provide in its Reply Comments, the Planning Resource Auction results.

[Minnesota Statutes § 216B.16](#), subd. 7, authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their FCA rates monthly to reflect, on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation (Docket No. E999/CI-03-802) to explore possible changes to the FCA and invited stakeholders to comment on the purpose, structure, rationale, and relevance of the FCA. The Commission's December 19, 2017 [Order](#) in Docket No. E999/CI-03-802 approved certain reforms to the FCA mechanism. Specifically, Point 1 of the *Order* approved the Department's FCA reform proposals as follows:

- a. The Commission will set recovery of the Utility's fuel, power purchase agreements, and other related cost (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.
- b. Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- c. The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- d. Utilities will be allowed to track any changes in \$/MWh fuel costs that occur over the year and there will be no carrying charge on the tracker.
- e. Annually, each electric utility will report actual \$/MWH fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year.
- f. Each electric utility will refund any over-collections and show prudence of costs before allowing recovery of under-collections. If

annual revenues collected (\$/MWh) are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs), the utility must show why it is reasonable to charge the higher costs (under-collections) to ratepayers through a true-up mechanism.

The Commission's December 12, 2018 [Order](#) in Docket No. E999/CI-03-802 modified certain aspects of and added to the FCA reform previously approved in the Commission's December 19, 2017 *Order* in the same docket. In particular, the December 12, 2018 *Order*:

- Established a January 1, 2020 implementation date for the FCA reform.
- Required utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year following the relevant calendar year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.
- Granted the relevant utilities a variance to Minnesota Rules 7825.2600, subp. 3, which requires the FCA to be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base fuel rates annually.

The Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03-802 provided additional details to finalize the FCA reform. Specifically, the *Order* approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these rules.
- A procedural schedule, shown in Appendix A of the *Order*.
- A threshold of plus or minus five percent of all FCA costs and revenues to determine whether an even qualifies as significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.
- Tracking under or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.

- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019 [joint comments](#)¹ in Docket No. E999/CI-03-802 and the requirement that the annual true-up filings include a complete analysis and discussion of the consequences of self-commitment and self-scheduling of their generators, including the annual difference between production costs and corresponding prevailing market prices.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019 joint comments in Docket No. E999/CI-03-802.
- Discontinuation of Xcel's reporting of Part H, Section 4 narrative and Schedule 1 (transformers); Part I (MISO Day 1); Part J, Section 5, Schedules 1, 3-6 (MISO Day 2); Part K, Section 5, Schedule 3 (transformer maintenance); Part K, Section 4, Schedule 3 (designated resource planning for MISO).

On May 3, 2021, Minnesota Power filed its [2022 Forecasted Fuel and Purchased Energy Report](#) for approval of fuel rates for 2022 in Docket No. E015/AA-21-312. On December 2, 2021, the Commission issued its [Order](#) approving the following for Minnesota Power:

1. Authorized Minnesota Power to implement its 2022 Fuel Clause Adjustment (FCA) forecast, based on forecasted sales of 8,763,862 megawatt-hours (MWh) and forecasted fuel costs of \$229,065,935.
2. Required Minnesota Power to submit a compliance filing with revised tariff sheets and supporting calculations within 10 days of the Commission's Order in Docket No. E015/AA-21-312 for implementation effective January 1, 2022.
3. Required Minnesota Power to file a request to modify the approved fuel rate as soon as practicable, if during 2022 Minnesota Power experiences an impact on all FCA costs and revenues of plus or minus 5% or larger. Minnesota Power will then be required to implement the revised rates, subject to a full refund, following a 30-day notice period, if no party objects to the revised rate.

¹ In the March 1, 2019 joint comments, Attachment 1 corresponds to Minnesota Power.

On May 2, 2022, Minnesota Power filed its [2023 Forecasted Fuel and Purchased Energy Report](#) for approval of fuel rates for 2023 in Docket No. E015/AA-22-216. On December 8, 2022, the Commission issued its [Order](#) approving the following for Minnesota Power:

1. Authorized Minnesota Power to implement its Revised 2023 FCA forecast, based on forecasted sales of 8,815,400 kWh and forecasted fuel costs of \$294,446,791.
2. Required Minnesota Power to make a compliance filing with redlined and clean versions of the Fuel and Purchased Energy Rider Tariff sheet with supporting calculations, within 10 days of the date of this for implementation effective January 1, 2023.
3. Delegated authority to the Executive Secretary to approve the contents of any subsequent customer notice and rate schedule in this proceeding.
4. Ordered Minnesota Power to file a revised 2023 forecast that incorporates 2023/2024 MISO Planning Resource Auction credit/revenue, if applicable, once results are known, and incorporate them into rates the first of the month following the revised 2023 forecast filing, waiving the 30-day notice under a significant event filing.

On May 1, 2023, Minnesota Power filed its [2024 Forecasted Fuel and Purchased Energy Report](#) for approval of fuel rates for 2024 in Docket No. E015/AA-23-180. On November 9, 2023, the Commission issued its [Order](#) approving the following for Minnesota Power:

1. Approved Minnesota Power's Annual Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024, subject to a subsequent true-up.
2. Required Minnesota Power to make a compliance filing with a redlined and clean version of the Fuel and Purchased Energy Rider Tariff sheet with 10 days of the Commission's Order.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, 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 St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. E015/AA-24-64

Dated this 1st day of July 2024

/s/Sharon Ferguson

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Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_24-64_AA-24-64
M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.	120 S 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-64_AA-24-64

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher J.	Oppitz	N/A	-	PO Box 910 Park Rapids, MN 56470-0910	Paper Service	No	OFF_SL_24-64_AA-24-64
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_24-64_AA-24-64
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_24-64_AA-24-64
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_24-64_AA-24-64
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_24-64_AA-24-64
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_24-64_AA-24-64
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-64_AA-24-64
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_24-64_AA-24-64
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_24-64_AA-24-64
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_24-64_AA-24-64

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Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_24-64_AA-24-64
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_24-64_AA-24-64
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_24-64_AA-24-64
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_24-64_AA-24-64
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_24-64_AA-24-64
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-64_AA-24-64
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_24-64_AA-24-64
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_24-64_AA-24-64
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_24-64_AA-24-64
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, MN 55720	Electronic Service	No	OFF_SL_24-64_AA-24-64

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James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-64_AA-24-64
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_24-64_AA-24-64
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_24-64_AA-24-64
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_24-64_AA-24-64
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-64_AA-24-64
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_24-64_AA-24-64
Kristen	Vake	kvake@taconite.org	Iron Mining Association of Minnesota	1003 Discovery Drive Chisholm, MN 55719	Electronic Service	No	OFF_SL_24-64_AA-24-64
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Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-64_AA-24-64
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_24-64_AA-24-64

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Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_24-64_AA-24-64
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_24-64_AA-24-64