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September 23, 2015

PUBLIC DOCUMENT

Daniel P. Wolf  
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/M-15-699

Dear Mr. Wolf:

Attached are the **PUBLIC Comments** of the Minnesota Department of Commerce-Division of Energy Resources (Department) in the following matter:

Minnesota Power's Petition for Approval of an Electric Service Agreement  
between Magnetation, LLC and Minnesota Power.

The petition was filed on July 24, 2015 by:

Christopher D. Anderson  
Associate General Counsel  
Minnesota Power  
30 West Superior Street  
Duluth, MN 55802

The Department recommends **approval** of the Electric Service Agreement and is available to answer any question the Commission may have.

Sincerely,

/s/ CHRISTOPHER SHAW  
Rates Analyst

CS/lt  
Attachment

## BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

PUBLIC COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET No. E015/M-15-699

**I. INTRODUCTION**

On July 24, 2015, Minnesota Power (MP or the Company) petitioned the Minnesota Public Utilities Commission (Commission) for approval of an Electric Service Agreement (ESA or Agreement) between MP and Magnetation, LLC (Magnetation or the Customer). Under the proposed ESA, MP would provide power for Magnetation's iron ore concentrate facilities near Taconite and Coleraine, Minnesota. The proposed ESA covers service to both Magnetation's Plant 2 Facilities near Taconite, Minnesota and Magnetation's Plant 4 Facilities near Coleraine, Minnesota. Under the proposed ESA, Magnetation would purchase all its electric service requirements from Minnesota Power through at least 2025.

The proposed ESA is similar to the previously approved ESAs between MP and Magnetation in Docket Nos. E015/M-11-823, E015/M-13-93 and E015/M-14-130. However, under the proposed ESA, all of Magnetation's electric service requirements will be provided under MP's Large Power (LP) Service Schedule. Under the existing arrangement, Magnetation's Plant 2 receives electric service under MP's Large Light and Power (LLP) Service Schedule.

On September 24, 2015,<sup>1</sup> Fresh Energy submitted comments recommending that the Commission amend the proposed ESA. Fresh Energy requested that certain restrictions regarding Magnetation's right to construct, operate, or utilize self-generating or cogenerating capacity be struck from the proposed ESA. Instead, Fresh Energy recommended that the Commission add a term to the ESA that requires both Magnetation and MP to "identify and analyze energy savings opportunities, including, but not limited to, self-generating and cogeneration capacity" at Magnetation's facilities.

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<sup>1</sup> The Department filed a request to extend the comment deadline on September 24, 2015.

## II. DEPARTMENT ANALYSIS

### A. *NECESSARY CONDITIONS FOR APPROVAL OF THE PROPOSED ESA*

In past dockets, the Minnesota Department of Commerce (Department) has identified conditions necessary for the Department to recommend approval of a proposed ESA.<sup>2</sup> The proposed ESA should be approved only if it is in the public interest. For the ESA to be in the public interest, it must meet the following conditions:

1. No party affected by the proposed ESA should be worse off as a result of the amendment.
2. The rates and terms of the ESA must not be discriminatory, namely the terms must be consistent with MP's approved tariffs and available to any other similarly situated large power customer.

### B. *TERM*

Under paragraph 2 of the proposed ESA, Magnetation would take service from MP through at least 2025, without any prior right of termination. Consistent with terms of the LP Service Schedule, the ESA may be terminated after 2025 with a written notice four years in advance of cancellation.

### C. *SERVICE REQUIREMENT*

The Service Requirement is provided under "take-or-pay" conditions, meaning that the customer must pay for the Minimum Billing Requirement, regardless of the level of service actually taken. The proposed ESA requires a Minimum Billing Requirement of **[TRADE SECRET DATA HAS BEEN EXCISED]** in monthly bills. Under Paragraph 5 of the proposed ESA, Magnetation is obligated to purchase all its power and energy requirements from MP.

There are additional provisions which include Incremental Production Service, Allowance for Scheduled Maintenance and Increases and Decreases in Service Requirements. These provisions generally allow the customer more flexibility regarding its electric requirement while providing MP with appropriate compensation. As noted above, service is currently provided to Magnetation under similar terms.

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<sup>2</sup> See Docket No. E015/M-14-130.

**D. GUARANTEED ANNUAL REVENUE**

The proposed ESA provides for a Guaranteed Annual Revenue<sup>3</sup> requirement that carries forward the amount from the existing Plant 4 ESA to ensure that sufficient revenues from Magnetation are recovered to support the service extension<sup>4</sup> and other costs required to provide service. The Guaranteed Annual Revenues are as follows:

**[TRADE SECRET DATA HAS BEEN EXCISED]**

**E. PUBLIC INTEREST DETERMINATION**

1. *No party affected by the proposed Amendment should be worse off as a result of the ESA*

The parties that may be affected under the proposed ESA are the Company, Magnetation, and MP's ratepayers. Since MP and Magnetation agreed on the proposed ESA and since they are both assumed to act in their own best interest, clearly neither the Company nor Magnetation are worse off as a result of the proposed ESA.

Regarding MP's ratepayers, the Department notes that the proposed ESA does not have any impact on MP's rates from the time the proposed ESA is in effect until MP's next rate case. Under the proposed ESA, Magnetation would take service under the approved LP tariff, which the Commission has found to be just and reasonable. Further, under the proposed ESA, Magnetation would provide additional contribution to MP's system fixed costs, thus benefiting the remaining MP ratepayers. The Department notes that such higher contributions would not affect MP's remaining ratepayers until MP files a rate case. Thus, the Department concludes that: 1) no party affected by the proposed Amendment should be worse off as a result of the ESA and 2) MP's other ratepayers may benefit in the future from Magnetation's increased contribution to MP's system fixed costs.

MP stated that the Company and its ratepayers have suffered a pre-petition bankruptcy debt loss of approximately \$650,000 as a result of Magnetation's May 5 Chapter 11 bankruptcy filing.<sup>5</sup> MP also stated that, upon Commission approval of the proposed ESA, Magnetation will make a motion in U.S. Bankruptcy Court to assume the ESA, and that Magnetation will then be required to pay its pre-petition debt of \$650,000 to MP. MP noted that this repayment will benefit the Company and its ratepayers. The Department notes that rates, including recovery for bad debt expense, were set in MP's last rate case; thus, it is unclear how ratepayers would be affected by Magnetation's pre-petition bankruptcy debt. The Department requests that MP explain in reply comments how ratepayers would benefit.

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<sup>3</sup> Guaranteed Annual Revenues include all revenues under the LP tariff.

<sup>4</sup> See Docket No. E015/M-14-130.

<sup>5</sup> The Department notes that MP states that Magnetation would likely qualify for an EITE rate, but the EITE has not yet been developed. See Attachment 1 (DOC IR 8).

## 2. *Non-Discriminatory Rates under the proposed ESA*

The rates under the proposed ESA are offered to Magnetation under the LP tariff. Clearly, such rates are available to any other customer meeting the requirements of the LP tariff. Therefore, they are clearly not discriminatory. Moreover, any specific terms of the contract are similar to the specific terms in the previous dockets<sup>6</sup> and would be available to any other large customer of MP facing similar circumstances to those of Magnetation. Therefore, the Department concludes that the rates and terms of proposed ESA are non-discriminatory.

### F. *COMMENTS OF FRESH ENERGY*

As noted above, on September 24, 2015, Fresh Energy submitted comments recommending that the Commission amend the proposed ESA. Fresh Energy requested that certain restrictions regarding Magnetation's right to construct, operate, or use self-generating or cogenerating capacity be struck from the proposed ESA. Instead, Fresh Energy recommended that the Commission add a term to the ESA that requires both Magnetation and MP to "identify and analyze energy savings opportunities, including, but not limited to, self-generating and cogeneration capacity" at Magnetation's facilities.

Because Fresh Energy's proposed amendment could harm MP's other ratepayers, the Department cannot support this amendment to the proposed ESA with Magnetation or other ESAs. Under the proposed amendment, Magnetation would be allowed to construct generation capacity to offset its load without consulting MP.<sup>7</sup> Allowing Magnetation to offset its load could adversely affect other ratepayers by reducing Magnetation's contribution toward MP's costs, thus imposing a greater burden on MP's other ratepayers. This result would be especially true if MP acquires additional resources (including contracts or investments in facilities to serve a large customer) in order to meet load that does not materialize due to a customer's decision to self-generate.

Additionally, amending the ESA to allow Magnetation to self-generate without consulting MP would also create additional uncertainty in the resource planning process. As Fresh Energy requested that its proposed amendment be applied to future ESAs, and MP offers similar terms to similarly situated customers, the added uncertainty would apply to most of MP's load.<sup>8</sup>

However, it is also possible that, if considered in the larger context of MP's resource plan and overall system needs, self-generation or co-generation could be part of a cost-effective plan to reliably and efficiently serve MP's customers. The Department notes that MP considered numerous resource options in its recently filed IRP, some of which could represent customer-sited generation.<sup>9</sup> In addition to ensuring that MP fully and fairly considers customer-sited and distributed generation, as well as demand side resources in

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<sup>6</sup> E015/M-11-823, E015/M-13-93 and E015/M-14-130.

<sup>7</sup> The Department notes that Fresh Energy has not proposed to amend the portions of the proposed ESA that provide for a Minimum Billing Requirement and Guaranteed Annual Revenue.

<sup>8</sup> According to page 1 of MP's IRP, 54 percent of MP's sales were to large power customers in 2014.

<sup>9</sup> Appendix J of MP's IRP, Docket No. E015/RP-15-690.

its planning processes, MP should also ensure these resources are fully and fairly considered when MP acquires additional resources, such as through a request for proposal (RFP). The Department requests the MP explain if reply comments how customer-sited and distributed generation resource could participate in its resource acquisition process. The Commission could also consider requiring MP to provide notice to existing customers of any resource acquisition process to ensure those customer are able to participate.

MP currently has significant amounts of small-scale and distributed generation facilities on its system. These include numerous wind and photovoltaic qualifying facilities that receive a net-metered rate, projects developed under MP's Renewable Energy Program and Community Wind Power Project, industrial cogeneration facilities at Rapids Energy Center, Cloquet Energy Center, and Hibbard Renewable Energy Center and other projects as detailed on pages 35-42 of Appendix C of MP's recently filed Integrated Resource Plan. Further, Sappi, Boise, Verso, and Northshore Mining are MP customers that own significant amounts of on-site generation.<sup>10</sup> MP indicated that additional customers, including Magnetation, have not indicated at desire to pursue on-site generation.<sup>11</sup>

Finally, Fresh Energy's request that Magnetation be required to complete a study as a condition of receiving service on the proposed ESA, may run afoul of Minn. Stat. § 216B.03 which requires that, "Rates shall not be unreasonably preferential, unreasonably prejudicial, or discriminatory, but shall be sufficient, equitable, and consistent in application to a class of consumers." As a public utility, Minnesota Power is obligated to serve customers in its exclusive service territory under the tariffed rates approved by the Commission. A requirement that Magnetation complete a study prior to obtaining service is both inconsistent with the terms of the LP Tariff and inconsistent with terms offered to other similarly situated customers and thus would be discriminatory.

In summary, MP currently has significant amounts of small-scale, distributed, and customer-owned generation facilities on its system. While it is certainly possible that, if considered in the larger context of MP's resource plan and overall system needs, additional self-generation or co-generation at Magnetation could be part of a cost-effective plan to reliably and efficiently serve MP's customers, adding Fresh Energy's proposed amendments to the ESA is not the way to achieve that outcome because allowing Magnetation to offset its load without joint planning with MP may harm MP's other ratepayers and would be considered discriminatory.

#### *G. CUSTOMER-SITED RESOURCES*

As noted above, customer sited resources, both supply- and demand-side, may be cost-effective resource additions to MP system. MP currently has numerous customers using customer-sited generation, using interruptible service, and participating in the Company's Released Energy Rider<sup>12</sup> through which large power customers can receive credit for cooperating with the Company to create short-term off-system sales or avoid energy

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<sup>10</sup> See Attachment 2 (DOC IR 1)

<sup>11</sup> See Attachments 3 and 4 (DOC IRs 2 and 3)

<sup>12</sup> Attachment 5 (DOC IR 4).

purchases. Further, MP customers have indicated a willingness to participate in MISO's energy markets as a Demand Response Resource (DRR) Type 1 or Type 2 resource.<sup>13</sup>

Under the proposed ESA, Magnetation may construct, operate, or utilize self-generation or cogeneration if MP agrees in a written amendment to the ESA. The Department concludes that this term is reasonable as it protects existing ratepayers while also allowing self-generation or cogeneration if in the best interest of MP's system.

As an alternative to the recommendation by Fresh Energy, the Department recommends that the Commission require MP to work with any customer who is interested in self-generation or cogeneration, to determine how those generation additions may be incorporated into MP's resource planning decisions. Further, if tariff revisions or ESA modifications are necessary to allow customers to pursue cost-effective self-generation or cogeneration, or to be able to fully participate as a demand-side resource in the MISO market, MP should propose appropriate tariff and/or ESA modifications to the Commission. MP has agreed to a similar proposal regarding demand response in the past.<sup>14</sup>

### III. CONCLUSION

The Department concludes that the ESA between MP and Magnetation is in the public interest. As Magnetation would take service using the Company's existing LP tariff, the Company's other ratepayers should experience no significant negative impacts from the proposed ESA. Magnetation's commitments would contribute toward fixed cost recovery on MP's system.

The Department notes that this agreement is similar to other ESAs between MP and its large power customers. Further, the Company stated that it intends to continue its practice of "making similar terms and conditions available to eligible LP customers in similar situations."

### IV. RECOMMENDATION

The Department recommends that the Commission approve the petition for an Electric Service Agreement between Minnesota Power and Magnetation.

The Department requests the MP explain in reply comments how ratepayers would benefit from the payment of the pre-petition debt and how customer-sited and distributed generation resource could participate in its resource acquisition processes.

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<sup>13</sup> Attachment 6 (DOC IR 5).

<sup>14</sup> See Docket No. E015/M-07-221.

The Department also recommends that the Commission:

- Direct MP to work with any large power customer who is interested in self-generation or cogeneration, to determine how those generation additions may be incorporated into MP's resource planning decisions. If tariff revisions or ESA modifications are necessary to allow customers to pursue cost-effective self-generation or cogeneration, or to be able to fully participate as a demand-side resource in the MISO market, MP should propose appropriate tariff and/or ESA modifications to the Commission.
- Consider requiring MP to provide notice to existing customers prior to any resource acquisition process to ensure those customers are able to participate.

/lt



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

Nonpublic

Public

**Utility Information Request**

Docket Number: E015/M-15-699

Date of Request: 9/1/2015

Requested From: Minnesota Power

Response Due: 9/11/2015

Analyst Requesting Information: Chris Shaw

Type of Inquiry:     ..... Financial             ..... Rate of Return             ..... Rate Design  
                          ..... Engineering             ..... Forecasting             ..... Conservation  
                          ..... Cost of Service             ..... CIP                         ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
8	Please explain whether Magnetation could qualify for service under MP's competitive rate schedule or for an EITE rate.

**RESPONSE:**

The EITE has not yet been developed, but by the terms of the statute Magnetation would likely qualify. Magnetation would likely qualify for application of the competitive rate statute but it has not been applied to them.

Response by: David Moeller

List sources of information: \_\_\_\_\_

Title: Attorney Senior

Department: Legal Services

Telephone: (218) 723-3963

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

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[ ]..... Cost of Service [ ]..... CIP [ ]..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	<p>Please provide a list of all generation located on customer premises. Please indicate what entity owns the generation, who operates the generation, and how the generation contributes to MP's load serving needs.</p> <p><b>RESPONSE:</b></p> <p>The requested information pertaining to Minnesota Power owned generation on customer premises can be found in Minnesota Power's recently-filed Integrated Resource Plan – Docket No. E015/RP-15-690 at Appendix C – pages 4-6 and 35-42.</p> <p>The following customers also own on-site generation, which in each case reduces their electric requirements from Minnesota Power:</p> <ul style="list-style-type: none"> <li>• Sappi owns and operates generation at its Cloquet mill, with a total capacity of [TRADE SECRET DATA EXCISED].</li> <li>• Boise owns and operates generation at its International Falls mill, with a total capacity of [TRADE SECRET DATA EXCISED].</li> <li>• Verso owns and operates generation at its Duluth mill, with a capacity of [TRADE SECRET DATA EXCISED].</li> <li>• Northshore Mining owns and operates two units with a total capacity of [TRADE SECRET DATA EXCISED].</li> </ul>

Response by: Christopher D. Anderson

List sources of information: \_\_\_\_\_

Title: Associate General Counsel

Department: Legal Services

Telephone: (218) 723-3961



**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

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                         ..... Cost of Service        ..... CIP                        ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
3	Please indicate whether Magnetation has indicated any desire to add generation on its premises.

**RESPONSE:**

Magnetation has expressed no desire to build on-site generation on its premises.

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Response by: <u>Robert Nanti</u>	List sources of information: _____
Title: <u>Key Account Manager</u>	_____
Department: <u>Marketing</u>	_____
Telephone: <u>(218) 471-4024</u>	_____

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
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Nonpublic

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                      ..... Engineering       ..... Forecasting       ..... Conservation  
                      ..... Cost of Service   ..... CIP                     ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

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Request No.	
4	Please indicate whether any Large Power customer has utilized MP's released energy rider in the past five years.

**RESPONSE:**

Yes, transactions entered into between Minnesota Power and Large Power customers through the Rider for Released Energy have been described in the annual compliance filings for the Docket (Docket No. E015/M-98-1414).

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Response by: <u>Leah Peterson</u>	List sources of information:
Title: <u>Supervisor - Key Account Analysis</u>	<u>Annual Compliance Filing</u>
Department: <u>Marketing</u>	<u>Docket No. E015/M-98-1414</u>
Telephone: <u>218-355-3014</u>	<u></u>

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

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**Utility Information Request**

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                         ..... Engineering            ..... Forecasting            ..... Conservation  
                         ..... Cost of Service            ..... CIP                            ..... Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
5	Please indicate whether any Large Power customer has indicated a willingness to participate in the MISO energy market as a DRR Type 1 or Type 2 resource.

**RESPONSE:**

Yes, customers have indicated a willingness to participate. However, customers have also communicated to Minnesota Power that the payment received as a participant would need to outweigh the production risk and the ability to have energy curtailed within 10 minutes. As a result, currently no customers are DRR Type 1 or Type 2 MISO market participants.

Response by: Robert Nanti

List sources of information: \_\_\_\_\_

Title: Key Account Manager

Department: Marketing

Telephone: (218) 471-4024

## **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/M-15-699**

**Dated this 23<sup>rd</sup> day of September 2015**

**/s/Sharon Ferguson**

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	OFF_SL_15-699_M-15-699
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_15-699_M-15-699
Gary	Anderson	N/A	Stora Enso	Duluth Paper Mill 100 N. Central Avenue Duluth, MN 55807	Paper Service	No	OFF_SL_15-699_M-15-699
William	Bond	william.bond@arcelormittal.com	ArcelorMittal USA - Minorca Mine Inc.	PO Box 1 5950 Old Highway 53 Virginia, MN 55792	Electronic Service	No	OFF_SL_15-699_M-15-699
Greg	Chandler	greg.chandler@upm-kymmene.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_15-699_M-15-699
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-699_M-15-699
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_15-699_M-15-699
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417  Mountain Iron, MN 55768	Paper Service	No	OFF_SL_15-699_M-15-699
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-699_M-15-699
Ed	LaTendresse	N/A	Hibbing Taconite	P O Box 589  Hibbing, MN 55746	Paper Service	No	OFF_SL_15-699_M-15-699
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	OFF_SL_15-699_M-15-699



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_15-699_M-15-699
Sarah	Manchester	N/A	Sappi Fine Paper North America	255 State St Fl 4 Boston, MA 02109-2617	Paper Service	No	OFF_SL_15-699_M-15-699
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_15-699_M-15-699
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_15-699_M-15-699
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-699_M-15-699
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_15-699_M-15-699
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_15-699_M-15-699
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	Yes	OFF_SL_15-699_M-15-699
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	OFF_SL_15-699_M-15-699
William	Schmidt		USG Interiors, Inc.	35 Arch Street Cloquet, MN 55720	Paper Service	No	OFF_SL_15-699_M-15-699

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Joe	Scipioni		PolyMet Mining, Inc.	P.O. Box 475 County Highway 666 Hoyt Lakes, MN 55750	Paper Service	No	OFF_SL_15-699_M-15-699
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_15-699_M-15-699
Jack	Tuomi	N/A	United Taconite	P O Box 180  Eveleth, MN 55734	Paper Service	No	OFF_SL_15-699_M-15-699
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_15-699_M-15-699
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-699_M-15-699