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April 6, 2015

VIA ELECTRONIC FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Minnesota Power's Petition for a Variance to Commission
Rules Regarding Billing Errors
Docket No. E015/M-15-___

Dear Mr. Wolf:

Please find attached for filing pursuant to Minnesota Rule Parts 7820.3800 (Billing Errors) and 7829.3200 (Other Variances) Minnesota Power's Petition for Approval of a Variance to Commission Rules.

Yours truly,

Christopher D. Anderson

CDA:sr
Attachment



STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Minnesota Power's
Petition for a Variance to Commission
Rules Regarding Billing Errors

Docket No. E-015/M-15-____

PETITION FOR APPROVAL
OF A VARIANCE TO
COMMISSION RULES

SUMMARY OF FILING

Minnesota Power seeks a variance from Minnesota Public Utilities Commission rules to allow for a rebilling to a customer due to the incorrect classification of his service class. The variance would allow a refund in the amount of \$3,118.56 for service dates back to July 1, 2003. This Petition is filed pursuant to Minnesota Rule Parts 7820.3800 (Billing Errors) and 7829.3200 (Other Variances).

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Minnesota Power's
Petition for a Variance to Commission
Rules Regarding Billing Errors

Docket No. E-015/M-15-_____

PETITION FOR APPROVAL
OF A VARIANCE TO
COMMISSION RULES

INTRODUCTION

Minnesota Power submits to the Minnesota Public Utilities Commission this Petition for approval of a variance to the Commission's Billing Error Rules to approve a refund stemming from an incorrect rate schedule for service to a residential customer. This time period covered by the requested refund exceeds the three-year timeframe for remedies provided in the Commission's Rules.

I. SUMMARY OF FILING

Pursuant to Minn. R. 7829.1300, subp. 1, a one-paragraph summary is attached.

II. SERVICE ON OTHER PARTIES

Pursuant to Minn. R. 7829.1300, subp. 2 and Minn. Stat. § 216.17, subd. 3, Minnesota Power has electronically filed this document. A summary of the filing has been served on all parties on the Company's general service list.

III. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 3, the Company provides the following information.

A. Name, Address, and Telephone Number of Utility

Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 722-5642

B. Name, Address, and Telephone Number of Utility Attorney

Christopher D. Anderson
Associate General Counsel
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3961

C. Date of Filing

The date of this filing is April 1, 2015. The Company requests approval of the proposed variance to Minn. R. 7820.3800 to be effective immediately upon issuance of the Commission's Order granting our Petition.

D. Statute Controlling Schedule for Processing the Filing

This Petition is made pursuant to Minn. Stat. § 216B.16, subd. 1, which prescribes general timelines for rate and tariff changes, including, but not limited to, a requirement of 60-days' notice prior to any rate or tariff change.

Commission Rules define this filing as a "miscellaneous tariff filing" under Minn. R. 7829.0100, subp. 11 since no determination of Minnesota Power's overall revenue requirement is necessary. Minn. R. 7829.1400, subp. 1 and 4 permit comments in response to a miscellaneous filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Christopher D. Anderson
Associate General Counsel
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3961

IV. MISCELLANEOUS INFORMATION

Pursuant to Minn. R. 7829.0700, the company requests that the following persons be placed on the Commission's official service list for this proceeding:

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

Karen Virta
Administrative Supervisor
Minnesota Power
30 West Superior Street
Duluth, MN 55802
kvirta@mnpower.com

Any information requests in this proceeding should be submitted to Christopher D. Anderson at the email address noted above.

V. BACKGROUND

Mr. Daniel Zobel bought a group home in Duluth in 2003 and converted for use as his private residence. Unfortunately, neither he nor Minnesota Power were aware that the premise continued to be billed at the Commercial 25a rate until September, 2014, when Mr. Zobel noticed the classification on his September billing statement.

Upon Mr. Zobel's notification, Minnesota Power agreed to rebill for electric service for the previous three years (8-16-2014 to 9-17-2011), as allowed by Commission regulations. In order to grant a refund for the period exceeding three years (from 9-17-2011 to July 1, 2003) Minnesota Power must file this variance with the Commission.

The complication with trying to do a simple rebilling of service back to 2003 is that the active data for any billings prior to August 2009 is not available on Minnesota Power's billing system. We reviewed several methods of rebilling to give the customer the best possible outcome. We have enclosed a spreadsheet with each method and the refund that would be generated (Exhibit A).

The method we chose provides Mr. Zobel the largest refund. We calculated the percent difference between what was originally billed and what would have been billed if on the correct rate for each bill from 2009 to 2014. We added the percentages together and then divided by the

number of billings for the year to get to an average. We added the averages, then divided by the number of years. The average we used to calculate the additional refund from July 2003 to August 2011 results in a refund of \$3,118.56. Mr. Zobel has reviewed the refund spreadsheet and calculation method, agrees with the refund amount, and supports this Petition.

Under authority of Minnesota Rule 7820.3800 (Billing Errors), Minnesota Power must seek a variance from the requirements of Minnesota Rule 7820.3800 for refunds exceeding a one-year period, and is requesting Commission approval to do so.

VI. PROCEDURAL ISSUES REGARDING THE VARIANCE REQUEST

In order to accomplish this refund, Minnesota Power seeks a variance from Minnesota Public Utilities Commission rules regarding billing errors to rectify this overbilling for electric service. This Petition is filed pursuant to Minnesota Rule Parts 7820.3800 (Billing Errors) and 7829.3200 (Other Variances). Minnesota Rule part 7820.3800 states in part:

When a customer has been overcharged or undercharged as a result of incorrect reading of the meter, incorrect application of rate schedule, incorrect connection of the meter, application of an incorrect multiplier or constant or other similar reasons, the amount of the undercharge may be billed to the customer. The refund or charge in no event shall exceed one year, unless the date the error occurred can be fixed with reasonable certainty, in which case the refund or charge shall be computed from that date, but in no event for a period longer than one year.

Minnesota Rules part 7829.3200, subpart 1, sets forth the following criteria for evaluating waiver requests:

The commission shall grant a variance to its rules when it determines that the following requirements are met:

- A. enforcement of the rule would impose an excessive burden on the applicant or others affected by the rule;
- B. granting the variance would not adversely affect the public interest; and
- C. grant the variance would not conflict with standards imposed by law.

Minnesota Power believes that enforcement of the rule would impose an excessive and unreasonable burden. Both the Company and the customer are aware that the billing classification for the service was incorrect for the premises. Given that the billing inaccurately occurred through no fault of the customer or Minnesota Power, and the fact that Minnesota Power acknowledges that a billing inaccuracy occurred, strict enforcement of Minnesota Rule part 7820.3800 would be an excessive burden. The requested variance does not adversely affect the public interest because Mr. Zobel did not receive any additional electric service for the amount billed. The public interest is adequately protected where the utility customer is held harmless from an incident such as this, and where the amount at issue is reasonably verifiable. Minnesota Power is not aware of any conflict with any standards imposed by law from granting the variance.

The variance in this instance would also not impose an excessive burden on Minnesota Power. The variance would instead further the public interest by allowing Minnesota Power to appropriately refund the inadvertent overbillings due to Mr. Zobel, and the variance would not affect other customers.

VII. CONCLUSION

Based on the facts set forth in this Petition, Minnesota Power requests that the Commission grant a variance to Minnesota Rules 7820.3800 to allow Minnesota Power to refund \$3,118.56 to Mr. Zobel.

Dated: April 6, 2015

Respectfully submitted,



Christopher D. Anderson
Associate General Counsel
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3961

REBILLED 2009 BILL FACTORS

BILL DATE	BILL AMOUNT	USAGE	UPDATED BILL AMOUNT	DIFFERENCE	TOTAL BILLED UNDER 25A	TOTAL BILLED UNDER 20A	DIFFERENCE DUE TO CUSTOMER
9/16/2011	\$139.78	876	\$87.98	\$51.80	\$11,455.08	\$10,016.15	\$1,438.93
8/15/2011	\$129.78	856	\$83.68	\$46.10		INTEREST ON CREDIT	\$16.70
7/15/2011	\$141.29	1,033	\$101.45	\$39.84		TOTAL CREDIT	\$1,455.63
6/13/2011	\$110.66	659	\$66.23	\$44.43			
5/15/2011	\$108.28	613	\$63.71	\$44.57			
4/15/2011	\$153.79	1,038	\$112.84	\$40.95			
3/18/2011	\$176.62	1,408	\$155.00	\$21.62			
2/14/2011	\$193.80	1,462	\$162.37	\$31.43			
1/14/2011	\$203.26	1,518	\$173.94	\$29.32			
12/16/2010	\$195.48	1,554	\$179.28	\$16.20			
11/13/2010	\$129.67	778	\$85.01	\$44.66			
10/15/2010	\$130.01	887	\$95.19	\$34.82			
9/17/2010	\$118.56	756	\$78.47	\$40.09			
8/16/2010	\$158.84	1,037	\$111.11	\$47.73			
7/17/2010	\$134.29	970	\$102.10	\$32.19			
6/15/2010	\$102.26	562	\$54.99	\$47.27			
5/17/2010	\$120.41	791	\$81.63	\$38.78			
4/17/2010	\$122.39	728	\$75.27	\$47.12			
3/18/2010	\$168.06	1,224	\$133.27	\$34.79			
2/16/2010	\$182.98	1,479	\$163.65	\$19.33			
1/16/2010	\$184.80	1,622	\$171.48	\$13.32			
12/15/2009	\$157.40	1,288	\$128.32	\$29.08			
11/16/2009	\$131.00	1,008	\$95.52	\$35.48			
10/17/2009	\$105.88	893	\$80.48	\$25.40			
9/18/2009	\$102.17	917	\$82.75	\$19.42			
8/15/2009	\$99.36	720	\$63.52	\$35.84			
7/19/2009	\$86.08	697	\$71.39	\$14.69			
6/16/2009	\$92.78	571	\$55.99	\$36.79			
5/17/2009	\$106.00	784	\$80.84	\$25.16			
4/17/2009	\$167.00	1,532	\$166.13	\$0.87			
3/20/2009	\$170.08	1,664	\$183.70	-\$13.62			
2/17/2009	\$150.03	1,484	\$164.21	-\$14.18			
1/16/2009	\$161.53	1,662	\$175.86	-\$14.33			
12/15/2008	\$137.56	1,262	\$125.58	\$11.98			
11/16/2008	\$124.46	1,032	\$97.96	\$26.50			
10/16/2008	\$110.80	817	\$73.03	\$37.77			
9/16/2008	\$111.85	812	\$72.47	\$39.38			
8/16/2008	\$99.10	812	\$72.51	\$26.59			
7/19/2008	\$111.86	1,099	\$116.60	-\$4.74			
6/16/2008	\$103.81	750	\$75.74	\$28.07			
5/17/2008	\$94.28	705	\$71.96	\$22.32			
04/18/08	\$130.59	1384	\$149.41	-\$18.82			
03/17/08	\$112.22	1018	\$109.68	\$2.54			
02/15/08	\$199.08	2150	\$241.04	-\$41.96			
01/02/08	\$165.54	1700	\$180.03	-\$14.49			
12/01/07	\$120.06	1121	\$110.85	\$9.21			
11/02/07	\$198.30	2158	\$212.08	-\$13.78			
10/01/07	\$101.59	903	\$81.48	\$20.11			
09/05/07	\$109.32	1085	\$99.19	\$10.13			
08/02/07	\$90.87	853	\$76.53	\$14.34			
07/03/07	\$88.26	646	\$65.65	\$22.61			
06/04/07	\$95.40	752	\$75.96	\$19.44			
05/02/07	\$69.97	485	\$47.34	\$22.63			
04/03/07	\$91.50	673	\$69.04	\$22.46			
03/02/07	\$103.81	911	\$97.39	\$6.42			
02/02/07	\$79.46	707	\$74.54	\$4.92			
01/04/07	\$101.68	998	\$102.94	-\$1.26			
12/04/06	\$99.90	965	\$94.56	\$5.34			
11/03/06	\$176.68	1917	\$187.68	-\$11.00			
10/04/06	\$105.33	961	\$87.17	\$18.16			
09/05/06	\$103.34	983	\$89.20	\$14.14			
08/02/06	\$73.36	620	\$53.70	\$19.66			
07/05/06	\$84.90	796	\$82.54	\$2.36			
06/02/06	\$74.10	569	\$55.76	\$18.34			
05/02/06	\$73.37	650	\$65.80	\$7.57			
04/05/06	\$84.66	676	\$69.37	\$15.29			
03/07/06	\$92.36	883	\$94.20	-\$1.84			
02/02/06	\$97.90	875	\$93.93	\$3.97			
01/05/06	\$126.13	1192	\$124.25	\$1.88			
12/05/05	\$135.44	1425	\$142.62	-\$7.18			
11/03/05	\$116.77	1155	\$110.40	\$6.37			
10/05/05	\$75.73	622	\$53.92	\$21.81			
09/07/05	\$74.15	581	\$49.84	\$24.31			
08/04/05	\$81.84	713	\$62.80	\$19.04			
07/06/05	\$78.68	689	\$70.49	\$8.19			
06/03/05	\$79.02	649	\$64.58	\$14.44			
05/04/05	\$83.97	687	\$69.96	\$14.01			
04/01/05	\$74.40	621	\$63.17	\$11.23			

REBILLED 2009 BILL FACTORS

03/07/05	\$105.84	941	\$100.83	\$5.01
02/03/05	\$107.14	1188	\$130.04	-\$22.90
01/04/05	\$116.91	1348	\$141.37	-\$24.46
12/03/04	\$92.00	840	\$81.50	\$10.50
11/02/04	\$95.94	867	\$81.21	\$14.73
10/04/04	\$93.94	770	\$68.43	\$25.51
09/03/04	\$68.95	543	\$46.12	\$22.83
08/03/04	\$74.96	630	\$54.70	\$20.26
07/02/04	\$86.57	651	\$66.21	\$20.36
06/03/04	\$100.11	876	\$89.61	\$10.50
05/04/04	\$94.55	841	\$87.23	\$7.32
04/02/04	\$109.65	989	\$104.77	\$4.88
03/04/04	\$84.72	785	\$82.96	\$1.76
02/09/04	\$146.47	1544	\$171.54	-\$25.07
01/07/04	\$132.46	1528	\$161.14	-\$28.68
12/03/03	\$119.87	1422	\$142.32	-\$22.45
11/03/03	\$116.54	1145	\$109.40	\$7.14
10/06/03	\$164.17	1779	\$167.37	-\$3.20
09/05/03	\$102.96	1178	\$108.29	-\$5.33
08/06/03	\$63.61	570	\$48.81	\$14.80
TOTAL	\$11,455.08		\$10,016.15	\$1,438.93

REBILLED 2013-2014 BILL FACTORS

BILL DATE	BILL AMOUNT	USAGE	UPDATED BILL AMOUNT	DIFFERENCE	TOTAL BILLED UNDER 25A	TOTAL BILLED UNDER 20A	DIFFERENCE DUE TO CUSTOMER
9/16/2011	\$139.78	876	\$87.98	\$51.80	\$11,455.08	\$10,568.43	\$886.65
8/15/2011	\$129.78	856	\$83.68	\$46.10		INTEREST ON CREDIT	\$10.29
7/15/2011	\$141.29	1,033	\$101.45	\$39.84		TOTAL CREDIT	\$896.94
6/13/2011	\$110.66	659	\$66.23	\$44.43			
5/15/2011	\$108.28	613	\$63.71	\$44.57			
4/15/2011	\$153.79	1,038	\$112.84	\$40.95			
3/18/2011	\$176.62	1,408	\$155.00	\$21.62			
2/14/2011	\$193.80	1,462	\$162.37	\$31.43			
1/14/2011	\$203.26	1,518	\$173.94	\$29.32			
12/16/2010	\$195.48	1,554	\$179.28	\$16.20			
11/13/2010	\$129.67	778	\$85.01	\$44.66			
10/15/2010	\$130.01	887	\$95.19	\$34.82			
9/17/2010	\$118.56	756	\$78.47	\$40.09			
8/16/2010	\$158.84	1,037	\$111.11	\$47.73			
7/17/2010	\$134.29	970	\$102.10	\$32.19			
6/15/2010	\$102.26	562	\$54.99	\$47.27			
5/17/2010	\$120.41	791	\$81.63	\$38.78			
4/17/2010	\$122.39	728	\$75.27	\$47.12			
3/18/2010	\$168.06	1,224	\$133.27	\$34.79			
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1/16/2010	\$184.80	1,622	\$171.48	\$13.32			
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3/20/2009	\$170.08	1,664	\$189.28	-\$19.20			
2/17/2009	\$150.03	1,484	\$167.56	-\$17.53			
1/16/2009	\$161.53	1,662	\$189.04	-\$27.51			
12/15/2008	\$137.56	1,262	\$136.94	\$0.62			
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04/18/08	\$130.59	1384	\$155.49	-\$24.90			

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12/01/07	\$120.06	1121	\$120.34	-\$0.28
11/02/07	\$198.30	2158	\$237.74	-\$39.44
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06/03/05	\$79.02	649	\$69.98	\$9.04
05/04/05	\$83.97	687	\$73.26	\$10.71
04/01/05	\$74.40	621	\$65.83	\$8.57
03/07/05	\$105.84	941	\$102.35	\$3.49
02/03/05	\$107.14	1188	\$131.83	-\$24.69
01/04/05	\$116.91	1348	\$151.15	-\$34.24
12/03/04	\$92.00	840	\$88.15	\$3.85
11/02/04	\$95.94	867	\$89.34	\$6.60
10/04/04	\$93.94	770	\$79.05	\$14.89
09/03/04	\$68.95	543	\$54.42	\$14.53

REBILLED 2013-2014 BILL FACTORS

08/03/04	\$74.96	630	\$63.93	\$11.03
07/02/04	\$86.57	651	\$69.19	\$17.38
06/03/04	\$100.11	876	\$94.86	\$5.25
05/04/04	\$94.55	841	\$90.82	\$3.73
04/02/04	\$109.65	989	\$107.89	\$1.76
03/04/04	\$84.72	785	\$84.37	\$0.35
02/09/04	\$146.47	1544	\$174.81	-\$28.34
01/07/04	\$132.46	1528	\$172.87	-\$40.41
12/03/03	\$119.87	1422	\$155.75	-\$35.88
11/03/03	\$116.54	1145	\$120.73	-\$4.19
10/06/03	\$164.17	1779	\$194.89	-\$30.72
09/05/03	\$102.96	1178	\$124.89	-\$21.93
08/06/03	\$63.61	570	\$57.46	\$6.15
TOTAL	\$11,455.08		\$10,568.43	\$886.65

REBILLED WITH 20A&28% DISCOUNT

BILL DATE	BILL AMOUNT	% REDUCTION	UPDATED BILL AMOUNT	DIFFERENCE	TOTAL BILLED UNDER 25A	TOTAL BILLED UNDER 20A/28% DISCOUNT	DIFFERENCE DUE TO CUSTOMER
9/16/2011	\$139.78	N/A	\$87.98	\$51.80	\$11,455.08	\$8,372.31	\$3,082.77
8/15/2011	\$129.78	N/A	\$83.68	\$46.10		INTEREST ON CREDIT	\$35.79
7/15/2011	\$141.29	N/A	\$101.45	\$39.84		TOTAL CREDIT	\$3,118.56
6/13/2011	\$110.66	N/A	\$66.23	\$44.43			
5/15/2011	\$108.28	N/A	\$63.71	\$44.57			
4/15/2011	\$153.79	N/A	\$112.84	\$40.95			
3/18/2011	\$176.62	N/A	\$155.00	\$21.62			
2/14/2011	\$193.80	N/A	\$162.37	\$31.43			
1/14/2011	\$203.26	N/A	\$173.94	\$29.32			
12/16/2010	\$195.48	N/A	\$179.28	\$16.20			
11/13/2010	\$129.67	N/A	\$85.01	\$44.66			
10/15/2010	\$130.01	N/A	\$95.19	\$34.82			
9/17/2010	\$118.56	N/A	\$78.47	\$40.09			
8/16/2010	\$158.84	N/A	\$111.11	\$47.73			
7/17/2010	\$134.29	N/A	\$102.10	\$32.19			
6/15/2010	\$102.26	N/A	\$54.99	\$47.27			
5/17/2010	\$120.41	N/A	\$81.63	\$38.78			
4/17/2010	\$122.39	N/A	\$75.27	\$47.12			
3/18/2010	\$168.06	N/A	\$133.27	\$34.79			
2/16/2010	\$182.98	N/A	\$163.65	\$19.33			
1/16/2010	\$184.80	N/A	\$171.48	\$13.32			
12/15/2009	\$157.40	N/A	\$128.32	\$29.08			
11/16/2009	\$131.00	N/A	\$95.52	\$35.48			
10/17/2009	\$105.88	N/A	\$80.48	\$25.40			
9/18/2009	\$102.17	N/A	\$82.75	\$19.42			
8/15/2009	\$99.36	N/A	\$63.52	\$35.84			
7/19/2009	\$86.08	0.72	\$61.98	\$24.10			
6/16/2009	\$92.78	0.72	\$66.80	\$25.98			
5/17/2009	\$106.00	0.72	\$76.32	\$29.68			
4/17/2009	\$167.00	0.72	\$120.24	\$46.76			
3/20/2009	\$170.08	0.72	\$122.46	\$47.62			
2/17/2009	\$150.03	0.72	\$108.02	\$42.01			
1/16/2009	\$161.53	0.72	\$116.30	\$45.23			
12/15/2008	\$137.56	0.72	\$99.04	\$38.52			
11/16/2008	\$124.46	0.72	\$89.61	\$34.85			
10/16/2008	\$110.80	0.72	\$79.78	\$31.02			
9/16/2008	\$111.85	0.72	\$80.53	\$31.32			
8/16/2008	\$99.10	0.72	\$71.35	\$27.75			
7/19/2008	\$111.86	0.72	\$80.54	\$31.32			
6/16/2008	\$103.81	0.72	\$74.74	\$29.07			
5/17/2008	\$94.28	0.72	\$67.88	\$26.40			
04/18/08	\$130.59	0.72	\$94.02	\$36.57			
03/17/08	\$112.22	0.72	\$80.80	\$31.42			
02/15/08	\$199.08	0.72	\$143.34	\$55.74			
01/02/08	\$165.54	0.72	\$119.19	\$46.35			

REBILLED WITH 20A&28% DISCOUNT

12/01/07	\$120.06	0.72	\$86.44	\$33.62
11/02/07	\$198.30	0.72	\$142.78	\$55.52
10/01/07	\$101.59	0.72	\$73.14	\$28.45
09/05/07	\$109.32	0.72	\$78.71	\$30.61
08/02/07	\$90.87	0.72	\$65.43	\$25.44
07/03/07	\$88.26	0.72	\$63.55	\$24.71
06/04/07	\$95.40	0.72	\$68.69	\$26.71
05/02/07	\$69.97	0.72	\$50.38	\$19.59
04/03/07	\$91.50	0.72	\$65.88	\$25.62
03/02/07	\$103.81	0.72	\$74.74	\$29.07
02/02/07	\$79.46	0.72	\$57.21	\$22.25
01/04/07	\$101.68	0.72	\$73.21	\$28.47
12/04/06	\$99.90	0.72	\$71.93	\$27.97
11/03/06	\$176.68	0.72	\$127.21	\$49.47
10/04/06	\$105.33	0.72	\$75.84	\$29.49
09/05/06	\$103.34	0.72	\$74.40	\$28.94
08/02/06	\$73.36	0.72	\$52.82	\$20.54
07/05/06	\$84.90	0.72	\$61.13	\$23.77
06/02/06	\$74.10	0.72	\$53.35	\$20.75
05/02/06	\$73.37	0.72	\$52.83	\$20.54
04/05/06	\$84.66	0.72	\$60.96	\$23.70
03/07/06	\$92.36	0.72	\$66.50	\$25.86
02/02/06	\$97.90	0.72	\$70.49	\$27.41
01/05/06	\$126.13	0.72	\$90.81	\$35.32
12/05/05	\$135.44	0.72	\$97.52	\$37.92
11/03/05	\$116.77	0.72	\$84.07	\$32.70
10/05/05	\$75.73	0.72	\$54.53	\$21.20
09/07/05	\$74.15	0.72	\$53.39	\$20.76
08/04/05	\$81.84	0.72	\$58.92	\$22.92
07/06/05	\$78.68	0.72	\$56.65	\$22.03
06/03/05	\$79.02	0.72	\$56.89	\$22.13
05/04/05	\$83.97	0.72	\$60.46	\$23.51
04/01/05	\$74.40	0.72	\$53.57	\$20.83
03/07/05	\$105.84	0.72	\$76.20	\$29.64
02/03/05	\$107.14	0.72	\$77.14	\$30.00
01/04/05	\$116.91	0.72	\$84.18	\$32.73
12/03/04	\$92.00	0.72	\$66.24	\$25.76
11/02/04	\$95.94	0.72	\$69.08	\$26.86
10/04/04	\$93.94	0.72	\$67.64	\$26.30
09/03/04	\$68.95	0.72	\$49.64	\$19.31
08/03/04	\$74.96	0.72	\$53.97	\$20.99
07/02/04	\$86.57	0.72	\$62.33	\$24.24
06/03/04	\$100.11	0.72	\$72.08	\$28.03
05/04/04	\$94.55	0.72	\$68.08	\$26.47
04/02/04	\$109.65	0.72	\$78.95	\$30.70
03/04/04	\$84.72	0.72	\$61.00	\$23.72

REBILLED WITH 20A&28% DISCOUNT

02/09/04	\$146.47	0.72	\$105.46	\$41.01
01/07/04	\$132.46	0.72	\$95.37	\$37.09
12/03/03	\$119.87	0.72	\$86.31	\$33.56
11/03/03	\$116.54	0.72	\$83.91	\$32.63
10/06/03	\$164.17	0.72	\$118.20	\$45.97
09/05/03	\$102.96	0.72	\$74.13	\$28.83
08/06/03	\$63.61	0.72	\$45.80	\$17.81
TOTAL	\$11,455.08		\$8,372.31	\$3,082.77

% DIFF ACTUAL BILL FACTORS

BILL DATE	BILL AMOUNT	USAGE	UPDATED BILL AMOUNT	DIFFERENCE	% DISCOUNT	YEARLY AVERAGE DISCOUNT
08/16/14	162.7	963	107.19	\$55.51	34%	28%
07/16/14	141.43	706	77.21	\$64.22	45%	
06/16/14	153.46	781	85.3	\$68.16	44%	
05/15/14	193.11	1201	134.07	\$59.04	31%	
04/14/14	219.22	1494	171.86	\$47.36	22%	
03/16/14	202.6	1480	173.85	\$28.75	14%	
02/15/14	267.73	1898	223.65	\$44.08	16%	
01/16/14	264.11	2053	239.02	\$25.09	9%	
12/14/13	201.08	1398	156.28	\$44.80	22%	
11/14/13	159.18	981	104.35	\$54.83	34%	
10/15/13	153.21	920	96.28	\$56.93	37%	
09/15/13	145.93	835	86.06	\$59.87	41%	29%
08/17/13	143.6	804	82.68	\$60.92	42%	
07/18/13	144.04	796	82.83	\$61.21	42%	
06/17/13	163.98	981	102.75	\$61.23	37%	
05/17/13	173.71	1302	137.93	\$35.78	21%	
04/16/13	236.35	1843	202.91	\$33.44	14%	
03/16/13	232.15	1599	176.22	\$55.93	24%	
02/16/13	254.62	1905	210.87	\$43.75	17%	
01/15/13	248.43	1921	218.1	\$30.33	12%	
12/15/12	227.67	1732	190.19	\$37.48	16%	
11/15/12	185.24	1295	136.64	\$48.60	26%	
10/15/12	184.82	1174	125.02	\$59.80	32%	
09/15/12	163.99	969	102.58	\$61.41	37%	27%
08/17/12	189.4	1316	141.62	\$47.78	25%	
07/15/12	181.45	1233	130.39	\$51.06	28%	
06/15/12	169.47	1111	113.54	\$55.93	33%	
05/14/12	156.87	843	84.75	\$72.12	46%	
04/14/12	120.35	680	68.36	\$51.99	43%	
03/16/12	177.42	1344	143.54	\$33.88	19%	
02/13/12	191.05	1534	164.72	\$26.33	14%	
01/15/12	191	1614	167.84	\$23.16	12%	
12/15/11	169.4	1213	123.91	\$45.49	27%	
11/17/11	128.29	823	81.05	\$47.24	37%	
10/15/11	117.65	583	56.28	\$61.37	52%	
9/16/2011	\$139.78	876	\$87.98	\$51.80	37%	31%

% DIFF ACTUAL BILL FACTORS

8/15/2011	\$129.78	856	\$83.68	\$46.10	36%	
7/15/2011	\$141.29	1,033	\$101.45	\$39.84	28%	
6/13/2011	\$110.66	659	\$66.23	\$44.43	40%	
5/15/2011	\$108.28	613	\$63.71	\$44.57	41%	
4/15/2011	\$153.79	1,038	\$112.84	\$40.95	27%	
3/18/2011	\$176.62	1,408	\$155.00	\$21.62	12%	
2/14/2011	\$193.80	1,462	\$162.37	\$31.43	16%	
1/14/2011	\$203.26	1,518	\$173.94	\$29.32	14%	
12/16/2010	\$195.48	1,554	\$179.28	\$16.20	8%	
11/13/2010	\$129.67	778	\$85.01	\$44.66	34%	
10/15/2010	\$130.01	887	\$95.19	\$34.82	27%	
9/17/2010	\$118.56	756	\$78.47	\$40.09	34%	26%
8/16/2010	\$158.84	1,037	\$111.11	\$47.73	30%	
7/17/2010	\$134.29	970	\$102.10	\$32.19	24%	
6/15/2010	\$102.26	562	\$54.99	\$47.27	46%	
5/17/2010	\$120.41	791	\$81.63	\$38.78	32%	
4/17/2010	\$122.39	728	\$75.27	\$47.12	38%	
3/18/2010	\$168.06	1,224	\$133.27	\$34.79	21%	
2/16/2010	\$182.98	1,479	\$163.65	\$19.33	11%	
1/16/2010	\$184.80	1,622	\$171.48	\$13.32	7%	
12/15/2009	\$157.40	1,288	\$128.32	\$29.08	18%	
11/16/2009	\$131.00	1,008	\$95.52	\$35.48	27%	
10/17/2009	\$105.88	893	\$80.48	\$25.40	24%	
9/18/2009	\$102.17	917	\$82.75	\$19.42	19%	25%
Total	10016.17		\$7,425.56	\$2,590.61	26%	28%

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
E-FILING AND FIRST CLASS
MAIL

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 6th day of April, 2015, she served Minnesota Power's Petition for Approval of a Variance to Commission on the Minnesota Public Utilities Commission and the Minnesota Department of Commerce via electronic filing.



Susan Romans

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	GEN_SL_Minnesota Power_Minnesota Power General Service List
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
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	GEN_SL_Minnesota Power_Minnesota Power General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	GEN_SL_Minnesota Power_Minnesota Power General Service List
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	GEN_SL_Minnesota Power_Minnesota Power General Service List