

August 22, 2023

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

RE: **Response Letter from the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/AA-23-180

Dear Mr. Seuffert:

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's Petition for Approval of the Annual Forecasted Fuel and Purchased
Energy Rates for the Calendar Year 2024

Hillary A. Creurer, Regulatory Compliance Administrator for Minnesota Power, filed the Petition on May 1, 2023, and Marcia A. Podratz, Regulatory Compliance Principal for Minnesota Power, filed Reply Comments on July 31, 2023.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve Minnesota Power's 2024 Fuel Forecast, subject to a subsequent true-up**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ ANDREW GOLDEN
Financial Analyst

AG/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/AA-23-180

I. BACKGROUND

On May 1, 2023, Minnesota Power (MP or the Company) filed its 2024 Annual Forecasted Fuel and Purchased Energy Rates (Fuel Report) for the calendar year 2024. 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.

On June 30, 2023, the Minnesota Department of Commerce (Department) filed [Comments](#), recommending the Commission approve Minnesota Power's 2024 Fuel Forecast, subject to a subsequent true-up, pending additional information provided by Minnesota Power in Reply Comments. The Department requested Minnesota Power provide additional information regarding the following:

1. *Results of the MISO Planning Resource Auction and updates to the 2024 Fuel and Purchase Energy (FPE) Forecast.*
2. *Adjusted 2024 FPE Forecast and information supporting all changes.*
3. *The reasons for the \$20.5 million decrease in MISO Market sales between its 2023 and 2024 forecast.*

On July 31, 2023, the Company filed [Reply Comments](#) providing the information requested from the Department. The instant Response Comments discuss the Company's Reply Comments

II. DEPARTMENT'S ANALYSIS OF COMPANY'S REPLY COMMENTS

A. RESULTS OF THE MISO PLANNING RESOURCE AUCTION

At the time Minnesota Power filed its initial [Petition](#), its MISO Planning Resource Auction results were unavailable. In its Reply Comments, after results became available, the Company stated its PRA capacity prices "cleared extremely low" and resulted in 2024 FPE Forecast period (January 2024 to May 2024) capacity sale revenue of only \$771 (for five months) representing an immaterial amount of revenue that does not necessitate an update to the 2024 FPE Forecast.¹ The Department notes the annualized amount of capacity sales revenue would be approximately \$1,850 for 2024. The Department agrees the MISO capacity revenue is not material, however, this amount should be included in MP's 2024 FPE True-Up filing.

¹ Company Reply Comments, Page 2.

B. ADJUSTED 2024 FPE FORECAST

In its Reply Comments, the Company stated minor changes to its initial 2024 FPE Forecast were not significant enough to justify a revised forecast. The Company did note, however, that the planned outage schedule included in its initial Petition filing was incorrect and provided a revised, corrected version in its Reply Comments. The Company stated the revised, corrected version reflects the outage timing and duration assumptions that were used in the production cost modeling for generation output in the 2024 FPE Forecast.² In addition, the Company stated the corrections to the planned outage schedule “does not change the FPE forecast calculation or rates.”³

The Department reviewed the Company’s revised/corrected outage schedule found in Attachment 5 of the Company’s Reply Comments and concludes it appears reasonable. Moreover, the Department agrees the corrections to the planned outage schedule are not material, and as a result do not change the Company’s proposed 2024 FPE Forecast calculation or rates.

C. DECREASE IN MISO MARKET SALES

In its initial Comments, the Department requested Minnesota Power explain the reasons for the \$20.5 million decrease in MISO Market sales between its 2023 and 2024 forecast, from a \$56.7 million credit in its 2023 FPE Forecast to a \$36.2 million credit in its 2024 FPE Forecast.⁴ In its Reply Comments, the Company explained the “decrease in projected MISO market sales occurred because there is less Boswell generation forecasted in 2024.”⁵ As a result of this, there is less generation for asset-based sales and thus lower MISO market sales. Minnesota Power explained reduced Boswell generation is due to both longer planned outages for scheduled maintenance in 2024 as well as lower assumed MISO market prices.⁶

Based on the above, the Department concludes the Company reasonably explained its forecasted decrease in 2024 MISO Market Sales.

III. RECOMMENDATIONS

The Department recommends the Commission:

- Accept Minnesota Power’s Annual Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024, subject to a subsequent true-up.
- Require 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 Commission approval.

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

² Company Reply Comments, Page 2.

³ *Id.*

⁴ Department Comments, Page 12.

⁵ Company Reply Comments, Page 2.

⁶ Company Reply Comments, Page 3.

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
Response Comments**

Docket No. E015/AA-23-180

Dated this **22nd** day of **August 2023**

/s/Sharon Ferguson

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