COMMERCE DEPARTMENT

April 15, 2021 **PUBLIC DOCUMENT**

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/AA-19-302

Dear Mr. Seuffert:

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 the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2020.

The Petition was filed on March 1, 2021 by:

Hillary A. Creurer, Regulatory Compliance Administrator
Minnesota Power
30 West Superior Street
Duluth, MN 55802-2147
(218) 355-3455
hcreurer@allete.com

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Minnesota Power's Petition**. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ NANCY CAMPBELL
Financial Analyst Coordinator, CPA

NC/ja
Attachment

Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E015/AA-19-302

I. INTRODUCTION

On March 1, 2021, Minnesota Power Company (Minnesota Power or the Company) filed its Annual Automatic Adjustment 2020 True-Up Report (Petition) of the Company's Fuel and Purchased Energy (FPE) rates for calendar year 2020 with the Minnesota Public Utilities Commission (Commission). The Company submitted its Petition pursuant to the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802 and the applicable reporting requirements provided for in the rules that govern the automatic adjustment of charges, Minnesota Rules 7825.2800 to 7825.2840. Minnesota Power requests that the Commission approve the 2020 true-up for the Company's Forecasted Fuel and Purchased Energy rates and find that the Company's filing complies with the applicable reporting requirements.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Minnesota Power's Petition to determine (1) whether the Company's actual 2020 energy costs were reasonable and prudent, (2) whether the Company correctly calculated the 2020 true-up for its FPE rates, and (3) whether the Petition complies with the reporting requirements set forth in the applicable Minnesota rules and Commission orders. Minnesota Power's FPE and Fuel Clause Adjustment (FCA) refer to essentially the same cost recovery mechanism and are used interchangeably throughout the instant comments.

A. SUMMARY OF RECENT FUEL CLAUSE ADJUSTMENT REFORM

Minn. Stat. § 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 December 19, 2017 *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 costs (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 the 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 Rule 7825.2600, subp. 3, which requires that the FCA 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 June 12, 2019 *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, as shown in Appendix A of the *Order*.
- A threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a 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[2] in Docket No. E999/CI-03-802.

On November 14, 2019, in Docket No. E017/AA-19-302, the Commission approved Minnesota Power's January 2020 through December 2020 forecasted Rates for the Company's FPE rates.

On June 30, 2020, the Commission approved Minnesota Power's Resolution Proposal Petition in Docket Nos. E015/GR-19-442 and E015/M-20-429, to resolve and ultimately withdraw its 2019 Rate Case. In its Resolution Proposal, the Company proposed to retain the base rates set in the 2016 Rate Case but shift recovery of its energy and capacity asset-based wholesale sales margins (asset-based margins) from base rates to its fuel clause adjustment.

On July 1, 2020, Minnesota Power updated its 2020 FCA forecasted rates to reflect the shift in the recovery of asset-based margins from base rates to the FCA.

On July 31, 2020, Minnesota Power submitted Reply Comments in Docket No. E015/AA-20-463 related to its 2021 FCA forecast, indicating it would reduce the 2020 FCA Forecast by $12.2 million over a four-month period beginning in September 2020. The $12.2 million reduction was based on the Company's actual over-collection of fuel and purchases for the first six months of 2020.

---

[1] In the March 1, 2019 joint comments, Attachment 1 corresponds to Minnesota Power.
[2] In the March 1, 2019 joint comments, Attachment 4 corresponds to Minnesota Power and reflects the Company's current FPE Rate Schedule as approved by the Commission's June 12, 2019 *Order* in Docket No. E-999/CI-03-802.

The instant Petition provides the true-up between the Company's actual fuel/purchased power cost recovery through its FPE and the actual corresponding fuel/purchased power costs incurred by Minnesota Power for the period of January 1 - December 31, 2020.

B. PURPOSE OF MINNESOTA POWER'S PETITION

In its Petition, Minnesota Power: (1) demonstrated that the Company's fuel/purchased power costs for 2020 were reasonable and prudent,[3] (2) requested Commission approval of the Company's 2020 FCA refund/overcollection true-up of $3.7 million, to be applied to sales subject to the FCA over the period of September 2021 through August 2022,[4] and (3) requested Commission approval of the FCA true-up compliance reporting required by Minnesota Rules 7825.2800 – 7825.2840 and applicable Commission orders.[5] The Department discusses each of these three areas in the following sections.

C. PRUDENCY AND REASONABLENESS OF MINNESOTA POWER'S ACTUAL 2020 FUEL/PURCHASED POWER COSTS

Minnesota Power's actual 2020 fuel/purchased power costs were considerably less than the forecasted costs that were approved and used to set the corresponding FPE rates for 2020. As noted by Minnesota Power in its Petition, actual 2020 fuel/purchased power costs were less than forecasted primarily because:

- Due to COVID-19 Pandemic a number of the original assumptions included in the 2020 FCA Forecast ended up being different than actuals.
- Customer sales decreased by 549,000 MWhs, which was mainly due to the idling of large industrial customers.
- A major planned outage at Boswell Unit 4 originally planned for the spring of 2020 was postponed until the spring of 2021.
- Average MISO market prices were **[TRADE SECRET DATA HAS BEEN EXCISED]** than forecasted.

The following table summarizes and compares select energy sales and cost data relevant to Minnesota Power's 2020 FCA true-up:

---

[3] Petition, pages 4 to 7.
[4] Petition, pages 4 and 7.
[5] Petition, pages 3 and 4 and Attachment Nos. 1 to 11.

Department Table 1: Comparison of Select Forecasted to Actual Data for Minnesota Power's 2020 Fuel Clause Adjustment True-up[6]

Data Description	*2020 Actual (A)*	*2020 Forecast (B)*	*Percentage Difference (A-B)/B*
MWh Sales Subject to FPE	8,436,693	9,764,655	(13.6%)
Total Cost of Fuel/Purchased Power	$188,877,910	$236,211,634	(20.0%)
Average Fuel/Purchased Power Cost Per MWh	$22.39	$24.19	(7.4%)

Department Table 1 shows that Minnesota Power's relevant 2020 MWh sales were approximately 13.6 percent less than forecasted and that the Company's total system actual fuel/purchased power costs recoverable through the FPE for 2020 were about 20 percent less than the forecasted 2020 costs. Department Table 1 also shows that average fuel and purchased power costs were about 7.4 percent lower on a per MWh basis.

The cost and offsetting credit/revenue components of the Company's actual and forecasted 2020 fuel/purchased power costs recoverable through the FPE can be broken into several major categories, as summarized in the following table:

Department Table 2: Minnesota Power's Forecasted and Actual 2020 Fuel/Purchased Power Costs and Offsetting Credits/Revenues by Major Category[7]

Fuel/Purchased Power Cost, Credit, or Revenue Category	*2020 Actual (A)*	*2020 Forecast (B)*	*Percentage Difference (A-B)/B*
Plant Generation Costs	$76,291,182	$103,248,928	(26.1%)
Plus: Purchased Power Costs	$193,346,294	$198,857,794	(2.8%)
Plus: MISO Charges	$16,466,491	$12,154,321	35.5%
Less: MISO Schedule 16, 17 & 24	($164,843)	$333,698	(149.4%)
Less: Fuel Cost Recovered through Inter System Sales	$97,823,379	$78,133,355	25.2%
Less: Costs Related to Solar	$70	$101,692	(99.9%)
Plus: Time of Generation and Solar Energy Adjustment	$432,548	$519,336	(16.7%)
Total Net Cost of Fuel	$188,877,910	$236,211,634	(20.0%)
Total FPE or FCA Sales (MWh)	8,436,693	9,764,655	(13.6%)

[6] Data in Department Table 1 retrieved from Petition on Table 2.
[7] Data in Department Table 2 retrieved from Petition on Table 2.

Department Table 2 shows that Minnesota Power's actual 2020 plant generation and purchased power costs, the two largest components of the total net fuel/purchased power costs, were substantially less than forecasted. Minnesota Power provided data in its Petition showing that average MISO market price was **[TRADE SECRET DATA HAS BEEN EXCISED]** than forecasted. The lower energy market prices, combined with lower sales for large power customers, caused lower generation and purchased power costs for 2020.

Minnesota Power explained that customer sales decreased by approximately 549,000 MWhs, which was caused mostly by the idling of large industrial customers and lower commercial/business sales. However, intersystem sales increased on a net basis by approximately 780,400 MWhs[8] due to increases in MISO market sales, liquidated sales, and retail and resale loss of load sales.

Department Table 3: MP Sales Reconciliation
Difference Between Forecasted and Actual 2020 Sales[9]

	MWhs
Residential Difference	(3,306)
Commercial Difference	(120,511)
Industrial Difference	(346,328)
Municipal Difference	(15,095)
Other Misc. Difference	(64,624)
Total Customer Sales Difference	**(549,864)**
Less: 2020 Actual Customer Intersystem Sales	780,399
Less: Solar Generation and Purchases	(2,301)
Total FAC Sales	**(1,327,962)**

MP had 518,056 MWhs of sales with a related margin of $515,793 that were a result of retail and resale loss of load. When MP's customer demand nominations are lower than levels approved in the 2016 rate case, Minnesota Power is allowed to sell related MWhs in the wholesale market and keep related wholesale margins, as approved in Minnesota Power's Rate Case Resolution in Docket Nos. E015/GR-19-442 and E015/M-20-429.[10] The Department notes that while it is helpful to both Minnesota Power and its customers to sell excess MWhs in the wholesale market to offset lower retail sales, the margin on retail sales is much larger than the margin on wholesale sales at this time.

Department Table 2 also shows that Minnesota Power's 2020 MISO Charges[11] were forecasted at $12.2 million and actuals were $16.5 million, resulting in a $4.3 million or 35.5 percent increase in MISO costs. The Department notes that Minnesota Power's Attachment No. 3 on page 5 shows a $1.4

[8] See MP's Petition on Table 3 for a detailed breakout of sales by class and category.
[9] Petition, Table 3.
[10] See MP's response to Department Information Request Nos. 11 and 12.
[11] The MISO Charges on Table 2 do not include Day-Ahead and Real-Time Asset and Non-Asset Energy as these amounts are not tracked separately by MP's system. However, highest cost purchases and generation are assigned non-FAC sales to ensure lowest cost generation and purchases are assigned to FCA Sales.

million increase in energy losses and a $3.2 million increase in energy congestion costs, which appear to be a result of MP purchasing more day-ahead asset energy MWhs due to lower market prices compared to MP's own generation and purchase power contracts for certain hours.

The Department asked MP in Department Information Request no. 11 to explain how asset-based margins were returned to customers in 2020. To summarize MP's response, the Department notes that at a high, level asset based margins were provided to customers in base rates for January through April 2020, then in the interim rate refund for May and June 2020, and then in FCA as part of Intersystem Sales for July to December 2020. This transition which moved asset-based margins from base rates in the rate case to FCA was done as a result of Minnesota Power's Rate Case Resolution in Docket Nos. E015/GR-19-442 and E015/M-20-429.

In summary, Minnesota Power experienced lower retail but higher wholesale energy sales, substantially lower generation and purchase power costs, and higher MISO Charges during 2020, which contributed to the Company's actual 2020 fuel/purchased power costs being less than forecasted. Based on Minnesota Power's actual experience in 2020, the Department concludes that it is reasonable that the Company's actual 2020 fuel/purchased costs recoverable through the FCA were less than those forecasted. The Department recommends that the Commission find that Minnesota Power's actual 2020 fuel/purchased power costs recoverable through the FCA were reasonable and prudent.

D. MINNESOTA POWER'S 2020 FUEL CLAUSE ADJUSTMENT TRUE-UP

As noted earlier in the instant comments, on July 31, 2020, Minnesota Power submitted Reply Comments in the 2021 FCA Forecast in Docket No. E015/AA-20-463, indicating it would reduce the 2020 FCA Forecast by $12.2 million over a four-month period beginning in September 2020. The $12.2 million reduction was based on actual over-collection of fuel and purchases for the first six months of 2020. The Commission approved the $12.2 million reduction in its December 22, 2020 Order in Docket No. E015/AA-20-463. MP noted in its Petition that due to lower sales than forecasted only $8.9 million of the $12.2 million was refunded to customers in 2020.

In the instant Petition, Minnesota Power requests approval to refund customers $3,661,470 in FCA overcollections. Minnesota Power 's 2020 true-up calculation, which shows how the Company arrived at the proposed refund amount is summarized in the following two tables:

Minnesota Power's Table 1: Over/(Under) Collection Credit[12]

2020 Forecast to Actual Over Collection	$12,574,977
Less: Over Collection Credit Applied in 2020	$8,913,507
Remaining Over Collection Credit	$3,661,470

[12] Petition, page 4.

PUBLIC DOCUMENT

Department Table 4: Over/(Under) Collection Credit[13]

2020 Actual Collections from Customers	$162,690,593
Less: Actual Costs and Actual Sales	$159,029,124
Remaining Over Collection Credit	$3,661,470

In its instant Petition, Minnesota Power requests that the $3,661,470 overcollection be refunded to customers effective September 2021 through August 2022. However, based on the Department's discussion with Minnesota Power, because of the small size of the refund, and as long as its not considered precedential, the Company would be willing to refund the $3,661,470 over the period September to December 2021.

The Department concludes that Minnesota Power correctly calculated its 2020 FCA/FPE Rider over collection of $3,661,470. The Department asks MP to confirm that it would be willing to refund the $3,661,470 over the period September to December 2020 and to provide the corresponding refund factor rate for the FCA/FPE Rider in Reply Comments.

E. COMPLIANCE WITH REPORTING REQUIREMENTS

The Department verified that the instant Petition included the information required per the following:

- Minnesota Rules 7825.2800 - 7825.2840, as revised on pages 3 - 4 and approved in Point 1 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.
- Annual FCA true-up general reporting guidelines, as outlined on page 7 and approved in Point 5 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.
- Annual FCA true-up reporting compliance matrix specific to Minnesota Power, as shown in Attachment 1 of the March 1, 2019 joint comments and approved in Point 7 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.[14]

The Department did perform a more detailed review of Minnesota Power's Generation Maintenance Expenses and correlation to incremental forced outage costs compliance filing, as discussed below.

---

[13] See Minnesota Power's Attachment 2 on page 2 and response to Department Information Request No. 13.
[14] Point 7 of the Commission's June 12, 2019 *Order* in Docket No. E-999/CI-03-802 also stated that "each Electric Utility shall provide 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." The Company provided this analysis and discussion in its March 1, 2021 filing in Docket No. E999/CI-19-704.

1. *MAINTENANCE EXPENSES OF GENERATION PLANTS AND COORELATION TO INCREMENTAL FORCED OUTAGE COSTS (IN THE MATTER OF THE REVIEW OF THE 2005 AAA OF CHARGES FOR ALL ELECTRIC UTILITIES, DOCKET NO. E999/AA-06-1208)*

In its February 6, 2008 Order in Docket No. E999/AA-06-1208 (the 06-1208 Order), the Commission required all electric utilities subject to automatic adjustment filing requirements, with the exception of Dakota Electric, to include in future annual automatic adjustment filings the actual expenses pertaining to maintenance of generation plants, with a comparison to the generation maintenance budget from the utility's most recent rate case.

This requirement stems from the drastic increase in IOUs' outage costs during FYE06 and FYE07.[17] When a plant experiences a forced outage, the utility must replace the megawatt hours that plant would have produced if it had been operating, usually through wholesale market purchases. The cost of those market purchases flows through the FCA directly to ratepayers. The high level of outage costs in FYE06 and FYE07 raised the question of whether plants were being maintained appropriately to prevent forced outages, and whether IOUs were spending as much on plant maintenance as they were charging their customers in base rates. The Commission agreed with the Department and the Large Power Interveners that "utilities have a duty to minimize unplanned facility outages through adequate maintenance and to minimize the costs of scheduled outages through careful planning, prudent timing, and efficient completion of scheduled work." 06-1208 Order at 5.

The Department summarizes MP's maintenance spending below. As stated in the Department's FYE18 and FYE19 analysis, MP is spending less on maintenance of their generation facilities than the $42.0 million that was approved in their most recent rate case, and MP's spending continued to fall to $30.3 million in 2020.[15]

Comparison of Generation Maintenance Expense for MP ($ Millions)

Test Year	Approved Rate Case Amount	Actual 2018-2020 Average	Difference
2016	$42.0	$32.0[16]	(23.8%)

Due to the link between the level of maintenance expense and forced outages, and due to the different ratemaking incentives that have existed for maintenance expenses versus replacement fuel costs (incentive to minimize operations and maintenance expense between rate cases with little to no incentive to minimize replacement power costs because of flow through recovery), the Department intends to continue to monitor the IOUs' actual expenses pertaining to maintenance of generation

[15] See MP's Attachment 10 page 2 of the current Petition.
[16] MP's actual generation maintenance expense was $36.1 million for 2018 and $29.6 million for 2019.

plants, with a comparison to the generation maintenance amount approved in MP's most recent rate cases in future FCA true-up filings.

The Department notes that MP's average maintenance spending for 2018 to 2020 was $32.0 million or 23.8 percent lower than the $42.0 million provided in MP's rates. As a result, the Department considered MP's incremental forced outage costs for 2020 as reported on MP's Attachment Nos. 5 and 5.1. MP's incremental forced outage costs of negative $1.7 million were significantly lower than MP's forecasted incremental forced outage costs of $4.5 million, likely due to lower energy market prices. As a result of the low incremental forced outage costs for 2020, the Department will accept MP's forced outage costs for the 2020 true-up. However, the Department will carefully review MP generation maintenance expense level in the upcoming rate case and correlation to incremental force outage costs in future FCA forecasts and true-up filings.

The Department concludes that Minnesota Power's Petition complies with the applicable reporting requirements and recommends that the Commission approve the compliance reporting portions of the Company's Petition.

III. CONCLUSION AND RECOMMENDATIONS

Based on our review, the Department concludes that (1) Minnesota Power's actual fuel/purchased power costs for 2020 were reasonable and prudent, (2) Minnesota Power correctly calculated its 2020 FCA/FPE Rider over-collection of $3,661,470, and (3) Minnesota Power's Petition complies with the applicable reporting requirements. Therefore, the Department recommends that the Commission take the following actions:

- Find that Minnesota Power's actual 2020 fuel/purchased power costs recoverable through the FCA/FPE rider were reasonable and prudent for 2020.

- Find that Minnesota Power correctly calculated its 2020 FCA/FPE Rider over-collection of $3,661,470. The Department asks MP to confirm that it would be willing to refund the $3,661,470 over the period September to December 2020 and to provide the corresponding refund factor rate for the FCA/FPE rider in Reply Comments.

- Approve the compliance reporting portions of the Minnesota Power's Petition.

/ja

COMMERCE DEPARTMENT

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302
Requested From: Minnesota Power
Type of Inquiry: Financial

☐Nonpublic ☒Public
Date of Request: 3/11/21
Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us
Phone Number(s): 651-539-1821

ADDITIONAL INSTRUCTIONS:
Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	**11**
Topic:	Asset Based Margins
Reference(s):	MP's March 1, 2021 Filing

Request:

A. Please provide MP's total asset based sales and margins for 2020.

B. Please provide the wholesale sales and margins related to the "Sales due to Retail and Resale Loss of Load" - 518,000 MWhs shown on Table 3. Please explain if these margins are being kept by the Company and support for why this is reasonable.

C. Please provide the asset based sales and margins refunded to customers. Please explain if asset based margins refunded to customers are part (A) less part (B).

D. Please show how the asset based sales and margins were refunded to customers. Please explain your response.

Response:

A. The actual 2020 year to date "Asset Based Sales" were 1,187,385 MWhs and the margin was $23,085,356 after MISO costs. This includes a sale to **[TRADE SECRET DATA BEGINS** [redacted] **TRADE SECRET DATA ENDS]** Customer's received the margin credit from this sale in their base rates.

B. The actual 2020 year to date "Sales due to Retail and Resale Loss of Load" were 518,056 MWhs and the margin was $515,793 after MISO costs. The margins are retained by the Company which is in accordance with the results of Minnesota Power's Rate Case Resolution Docket Nos. E015/GR-19-442

To be completed by responder

Response Date:	March 22, 2011
Response by:	Ryan LaCoursiere
Email Address:	rlacoursiere@mnpower.com
Phone Number:	(218) 355-3678

COMMERCE DEPARTMENT

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302 ☐Nonpublic ☒Public
Requested From: Minnesota Power Date of Request: 3/11/21
Type of Inquiry: Financial Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us

and E015/M-20-429.

C. The Asset Based Sales refunded to the customers through the FAC forecast were 613,364 MWhs and the margin was $5,631,302 after MISO costs from July 2020 – December 2020. The Asset Based Sales margins were included in the 2020 FAC Forecast updated July 1, 2020 as a result of Minnesota Power's Rate Case Resolution Docket Nos. E015/GR-19-442 and E015/M-20-429 and reduced overall costs in the forecasted FAC rate. Asset Based Sales margins for May and June 2020 were refunded to the customer through the interim rate refund in accordance with the result of Minnesota Power's Rate Case Resolution Docket Nos. E015/GR-19-442 and E015/M-20-429. The Asset Based Sales margins refunded to the customers are not part (A) less part (B). The Asset Based Sales and margins presented in (A) do not include any sales and margins associated with Retail and Resale Loss of Load as they are tracked separately.

D. The Asset Based Sales MWhs have always been considered an Intersystem Sale which reduce the MWh Sales in the Retail FAC Calculation. They are Non FAC Sales and are removed as shown on Attachment 2, Line 11 "Less: Inter-System Sales" and are included with other sales in the "Market Sales" bucket. The Asset Based Sales Margins refunded to customers were included in the 2020 FAC Forecast updated July 1, 2020 as a result of Minnesota Power's Rate Case Resolution Docket Nos. E015/GR-19-442 and E015/M-20-429 and reduced overall costs in the 2020 forecasted FAC calculation. The Asset Based Sales Margins are included on Attachment 2, Line 5 "Less: Fuel Cost Recovered through Inter-System Sales" and the "Asset Based Margins" bucket.

To be completed by responder

Response Date:	March 22, 2011
Response by:	Ryan LaCoursiere
Email Address:	rlacoursiere@mnpower.com
Phone Number:	(218) 355-3678

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302
Requested From: Minnesota Power
Type of Inquiry: Financial

☐Nonpublic ☒Public
Date of Request: 3/11/21
Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us
Phone Number(s): 651-539-1821

ADDITIONAL INSTRUCTIONS:
Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	**12**
Topic:	Sales due to Retail and Resale Loss of Load
Reference(s):	MP's March 1, 2021 Filing – Table 3

Request:

A. Please provide all the calculations and supporting information showing the 2016 rate case approved sales (MWh) and Demand (MW) nominations compared to the actual 2020 sales MWh and Demand MW nominations that MP used in determining the 518,056 MWh "Sales due to Retail and Resale Loss of Load" on Table 3.

B. As part of your response to part (A) above, please identify for example, Firm, IPS, Economy, Excess, Incremental, Price Recall, EMSS, Unscheduled, RFPS, and other applicable categories billed energy sales to customers.

C. As part of your response to part (A) above, please separately identify the nominated demand, the billed demand, and the minimum demand for each customer.

D. Table 3 "Inter System Sales" line shows 588,049 MWhs increased Inter System Sales, is this due to lower retail sales allowing MP to make more Inter System Sales? Please explain.

E. Please explain the "Less Inter System Sales" line and why 4,415,869 MWhs is shown as actual sales when the line "Inter System Sales" shows actual sales of 3,635,470? Please explain in detail what accounts for the difference in these two numbers.

(Continued on next page)

To be completed by responder

Response Date:	March 22, 2021
Response by:	Ryan LaCoursiere
Email Address:	rlacoursiere@mnpower.com
Phone Number:	(218) 355-3678

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302
Requested From: Minnesota Power
Type of Inquiry: Financial

☐Nonpublic ☒Public
Date of Request: 3/11/21
Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us

In addition, whenever acronyms are used in the data given in response to all the parts above, please provide an explanation of all acronyms used AND also provide a brief but complete explanation of the source of each data series that is provided.

Response:

A. Sales due to Retail and Resale Loss of Load are transactions that are made as a result of a customer loss of load, are priced using the average cost of fuel, and the "source" of these transactions includes both rate based generating unit energy and energy market purchases. The bilateral sales are executed during hours that will provide a positive benefit, therefore, the number of MWh sold may be less than the total MWh that were considered available due to the loss of load. Please see **DOC IR 12.01 ATTACH TS** for the information supporting the 518,056 MWhs of Retail and Resale Loss of Load sales.

B. The support at **DOC IR 12.01 ATTACH TS** only pertains to Firm Sales. The other energy types listed in question (B) are Inter-System Sales or Non-Firm Sales and are not part of the "Sales due to Retail and Resale Loss of Load" calculation listed in part (A).

C. Only nominated demand is used in the calculation of "Sales due to Retail and Resale loss of Load." Billed demand changes monthly for each customer based on where they nominate and maintenance adjustments. Minimum demand is based on their contracts as the Large Power ("LP") customers have a minimum demand they pay for if they are idled. The billed demand and minimum demand is not used in the calculation of "Sales due to Retail and Resale Loss of Load."

D. Lower retail sales are a part of the increase in Inter System Sales. The biggest increases in 2020 were Liquidation (which are not forecasted as the model either decreases purchases or reduces generation instead of calculating liquidation.) Also, Minnesota Power had MISO Market sales, which were not forecasted due to every month having a market purchase when the forecast was prepared. The model does not create a purchase and sale for a month so only market purchases were calculated for the 2020 forecast. Actuals are looked at hourly and purchases and sales can occur every month.

To be completed by responder

Response Date: March 22, 2021
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: (218) 355-3678

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302 ☐Nonpublic ☒Public
Requested From: Minnesota Power Date of Request: 3/11/21
Type of Inquiry: Financial Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us

E. The difference between the 4,415,869 MWhs and the 3,635,470 MWhs is the actual Customer Inter System Sales of 780,399 shown on Table 3: Sales Comparison on the FAC 2020 True Up. When looking at actuals, these customer inter system sales were included in the individual customer classes on Table 3: Sales Comparison (residential, commercial, industrial, other misc.) Going forward we are looking into splitting out these sales further so the customer intersystem sales are not included in the individual customer classes.

To be completed by responder

Response Date: March 22, 2021
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: (218) 355-3678

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302
Requested From: Minnesota Power
Type of Inquiry: Financial

☐Nonpublic ☒Public
Date of Request: 3/11/21
Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us
Phone Number(s): 651-539-1821

ADDITIONAL INSTRUCTIONS:
Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	**13**
Topic:	Over/(Under) Collection Credit
Reference(s):	MP's March 1, 2021 Filing – Table 1

Request:

A. Please tie out the numbers on Table 1 to Attachment 2.

B. On Attachment 2 page 2, Part B, Summary – Over/Under Recovery, shows $162.690 million "Collected" from customers compared to "Actual" of $159.029 million to get to the $3.661 million over recovery amount. Please explain what the "Actual" amount represents and provide support for this number.

C. Please reconcile the $159.029 million Actual (on Attachment 2 page 2) to the $188.887 million Actual Total Cost of Fuel (on Table 2).

D. Please provide the spreadsheets with links and formulas included for MP's Attachments 2 and 5.1 in a Microsoft *.xlsx format. If any of these links target an outside file, please provide all such additional files.

Response:

A. The numbers on Table 1 do not tie out to Attachment 2 except for the Line 3, $3,661,470, which is the total amount that was over collected for 2020. The $12,574,977 on line 1 of Table 1 is what Minnesota Power would have over collected if Minnesota Power would not have refunded the over collection of $12,193,312 from September – December 2020. The over collection refund was included on the updated 2020 FAC Forecast that was submitted on July 31, 2020 in reply comments to Docket No. E015/AA-20-463. The $8,913,507 on Line 2 of Table 2 is the amount of the $12,193,312 refund that was actually refunded to customers. Since the $12,193,312 was a refund on the updated 2020 FAC

To be completed by responder

Response Date: March 22, 2021
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: (218) 355-3678

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-19-302
Requested From: Minnesota Power
Type of Inquiry: Financial

☐Nonpublic ☒Public
Date of Request: 3/11/21
Response Due: 3/22/21

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Nancy Campbell
Email Address(es): nancy.campbell@state.mn.us

Forecast based on forecasted sales, only a portion was actually refunded to customers as the actual sales were lower then what were forecasted.

B. The "Actual" of $159.029 million represents what Minnesota Power would have collected using actual costs and actual Retail sales. Please see **DOC 13.01 ATTACH** for the calculation of the "Actual" $159.029 million. It is calculated by taking actual costs and actual sales to determine the actual FAC rate for 2020. Actual Retail sales are multiplied by the actual FAC rate to total the "Actual" $159.029 million that would have been collected based on actual Retail sales and actual costs.

C. See **DOC IR 13.02 ATTACH** for the reconciliation of the $159.029 million actual Retail costs to the $188.887 million total actual fuel costs for 2020.

D. See **DOC IR 13.03 ATTACH TS** for Attachment 2 and **DOC IR 13.04 ATTACH TS** for Attachment 5.1 in excel format with formulas.

To be completed by responder

Response Date: March 22, 2021
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: (218) 355-3678

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-19-302

Dated this 15th day of April 2021

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-302_AA-19-302
Peter	Beithon	pbeithon@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-302_AA-19-302
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-302_AA-19-302
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-302_AA-19-302
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-302_AA-19-302
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Paper Service	No	OFF_SL_19-302_AA-19-302
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_19-302_AA-19-302
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-302_AA-19-302
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-302_AA-19-302
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-302_AA-19-302
John R.	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-302_AA-19-302
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-302_AA-19-302
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jerome	Hall	hallj@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	OFF_SL_19-302_AA-19-302
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-302_AA-19-302
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_19-302_AA-19-302
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-302_AA-19-302
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-302_AA-19-302
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurura, MN 55705	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-302_AA-19-302
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-302_AA-19-302
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-302_AA-19-302
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-302_AA-19-302
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-302_AA-19-302
Patrick	Loupin	PatrickLoupin@PackagingCorp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-302_AA-19-302

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	OFF_SL_19-302_AA-19-302
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-302_AA-19-302
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_19-302_AA-19-302
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouqet, MN 55720	Electronic Service	No	OFF_SL_19-302_AA-19-302
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-302_AA-19-302
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-302_AA-19-302
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-302_AA-19-302
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-302_AA-19-302
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-302_AA-19-302
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-302_AA-19-302
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Catherine	Phillips	Catherine.Phillips@wecenergygroup.com	Minnesota Energy Resources	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-302_AA-19-302
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
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_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-302_AA-19-302
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-302_AA-19-302
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-302_AA-19-302
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-302_AA-19-302
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-302_AA-19-302
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-302_AA-19-302
Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St - P321 Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-302_AA-19-302
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-302_AA-19-302
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-302_AA-19-302
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-302_AA-19-302
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-302_AA-19-302
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-302_AA-19-302
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-302_AA-19-302