

November 12, 2019

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/GR-19-442

Dear Mr. Wolf:

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

Application by Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota.

The Application was filed on November 1, 2019 by:

David R. Moeller
Minnesota Power
Senior Attorney and Director of Regulatory Compliance
30 West Superior Street
Duluth, MN 55802
(218) 723-3963

Patrick L. Cutshall
ALLETE Vice President and Corporate Treasurer
30 West Superior Street
Duluth, MN 55802
(218) 722-2625

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The Department recommends that the Minnesota Public Utilities Commission (Commission) accept Minnesota Power's filing as complete and refer this matter to the Office of Administrative Hearings. The Department is available to answer any questions that the Commission may have in this matter.

Sincerely,

/s/ NANCY CAMPBELL
Financial Analyst Coordinator

/s/ GEMMA MILTICH
Financial Analyst, CPA

NC/GM/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/GR-19-442

I. INTRODUCTION

On November 1, 2019, Minnesota Power (the Company) filed a general rate case, seeking to increase rates by \$65.9 million, or approximately 10.59 percent annually, effective January 1, 2020.

On November 5, 2019, the Minnesota Public Utilities Commission (Commission) issued a notice in the instant docket, requesting that potentially interested parties submit comment on whether Minnesota Power's general rate case application (Application) complies with the filing requirements in Minnesota Statutes §216B.16, Minnesota Rules, Parts 7825.3100 to 7825.4400, and the relevant Commission orders. The Commission also asked parties to address whether this matter should be sent to the Office of Administrative Hearings for a contested case hearing and, if so, what the scope of the hearing should be.

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's November 5, 2019 notice.

II. DEPARTMENT ANALYSIS

The Department reviewed the contents of the Application to verify Minnesota Power's compliance with:

- Statutory requirements (Minnesota Statutes §216B.16);
- Commission's rules governing filing requirements for rate changes (Minnesota Rules, parts 7825.3100 through 7825.4400);
- Commission policy statements,¹ with the caveat that a full analysis of compliance with certain Policy Statements will require factual analysis in the rate case;
- Commission orders pursuant to Minnesota Power's most recent general rate case in Docket No. E015/GR-16-664; and
- Commission orders in various dockets prior to or subsequent to Minnesota Power's most recent general rate case.

¹ On June 14, 1982, the Commission issued policy statements on rate cases to assist utilities by providing advanced guidance on the likely treatment of specific issues.

A. FILING COMPLETENESS AND SCOPE OF ISSUES TO BE ADDRESSED

Minnesota Power provided a list of regulatory requirements in Volume 1, Part 2 of its Application, identifying where in the Application the Company addressed the relevant statutes and rules, Commission policy statements, and prior Commission orders. Through its review, the Department noted that Minnesota Power did not file its complete Schedule H² in the eDockets filing system. Instead, the Company posted certain components of Schedule H on the Minnesota Power website and provided a link to the relevant webpage in Volume 3, Part 4 of the instant filing. The Department informed the Company that its Application may be considered incomplete without having the complete Schedule H filed in eDockets. Specifically, the Department notes that Minnesota Statutes § 216.17, subdivision 3 states the following:

As of January 1, 2008, any telephone company or telecommunications carrier subject to chapter 237; any public utility, cooperative association, or municipal utility subject to chapter 216B; and state agencies, shall file documents with the commission via the commission's electronic filing system. The executive secretary may approve an exemption from this requirement if an affected company or agency is unable to submit filings via the commission's electronic filing system. All parties, participants, or other interested persons shall submit filings to the commission via the commission's electronic filing system whenever practicable, but may also file by personal delivery or by mail.

As previously noted, Minnesota Power filed a link to Schedule H information in eDockets on November 1, so the Commission may determine that the case was technically complete as of November 1. Nonetheless, it is important that the information be filed in the record rather than links to information, to ensure that the information in the link is available in the future and has not been changed over time.

In response to and on the same day as the Department's contact with Minnesota Power, on November 7, 2019, Minnesota Power filed in the eDockets system the Company's complete Schedule H. The Department concludes that Minnesota's filing complies with the filing requirements.

The Department emphasizes that its review at this stage of the proceeding pertains only to whether the Company's Application discussed the issues in the listed previously, not as to whether Minnesota Power met its burden of proof to show that its proposals are reasonable.³ Such analysis is the focus of

² Volume 3, Part 4 of Docket No. E015/GR-19-442 contains Minnesota Power's Schedule H Index and the Summary Schedule H-1. The Company's Schedule H contains information pursuant to §216B.16, subdivision 17, regarding Travel, Entertainment and Employee Expenses.

³ In his February 2, 2015 Findings of Fact, Conclusions of Law and Order in Docket E002/CI-13-754, Administrative Law Judge Steve Mihalchick stated in part that:

A utility is not protected by any presumption of recovery simply by filing a request to increase rates. In order to recover any costs, the utility must produce sufficient evidence to prove that the rates it has

the investigatory period in the initial stage of the proceeding, based on the merits of the Application. Therefore, issues can be and will be further developed through information requests. Accordingly, the Department recommends that the Commission accept the Application as complete as of November 1, 2019, when Minnesota Power filed its rate case, or as of November 7, 2019, when the Company filed its complete Schedule H information. The Department further recommends that the Commission refer this matter to the Office of Administrative Hearings for a contested case proceeding.

Regarding scope, the Department recommends that the Commission request that the following issues be addressed, along with any particular issues the Commission would like to see developed in this proceeding:

- Is the test year revenue increase sought by the Company reasonable, or will it result in unreasonable and excessive earnings?
- Is the rate design proposed by the Company reasonable?
- Are the Company's proposed capital structure, cost of capital, and return on equity reasonable?
- Did the Company demonstrate that its proposed base rates appropriately exclude Fuel Clause Adjustment-related costs, as required by the Commission's November 5, 2019 *Order* in Docket No. E999/CI-03-802?

B. INTERIM RATE ADJUSTMENT

The Department offers brief comments on Minnesota Power's interim rate adjustment for a Large Market Wholesale Contract. The Department notes that the Company recorded an adjustment to remove four months' worth of asset-based margins (revenues less expenses) for a contract that ends on April 30, 2020, four months into the 2020 test year. Minnesota Power's adjustment removes \$8.3 million (Minnesota Jurisdictional basis) in net revenues from the income statement and increases rate base by \$1.2 million for the Minnesota jurisdiction (due to the associated accumulated deferred income taxes related to use of production tax credits), as shown in Volume I, Direct Schedules B-3 (IR) and B-7 (IR). The Department noted that both adjustments increase revenue requirements and increase interim rates by approximately \$8.5 million on a revenue requirement basis.⁴

While the Department typically does not weigh in as to interim rates, in this case the Department believes that interim rates should reflect the status quo and not include Minnesota Power's adjustments for its Large Market Wholesale Contract, which increases the Company's revenue requirements and interim rate request, prior to all parties having an opportunity to review these adjustments. For example, although this specific Minnesota Power contract ends on April 30, 2020 (four months into the test year), there may be new contracts or additional asset-based margins through the Midcontinent Independent System Operator's energy market that may replace some or all

requested are reasonable. If the utility fails to do so, then the costs must be disallowed; equally, if a public agency or other intervenor demonstrates that costs are unreasonable or imprudent, then they must be disallowed as well.

⁴ \$8.48 million = \$8.3 million plus (roughly 15% of \$1.2 million).

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Analysts assigned: Nancy Campbell, Gemma Miltich

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of these contract margins. Thus, the Department concludes that the four months of contract net revenues and related ADIT adjustment should remain in interim rates, with a final determination made for final rates.

As a result, the Department recommends that the Commission deny Minnesota Power's proposed adjustments to interim rates for a contract that ends on April 30, 2020, of approximately \$8.5 million on a revenue requirement basis. The Department also recommends that the Commission add this issue to the list of issues to be addressed by interested parties, to determine how this issue of Large Market Wholesale Contract and possible replacement revenues affect final rates.

III. CONCLUSION AND RECOMMENDATIONS

The Department recommends that the Commission:

- Accept Minnesota Power's rate case filing in the present docket as complete as of November 1 or November 7, 2019;
- Refer this matter to the Office of Administrative Hearings; and
- Deny Minnesota Power's proposed adjustments to interim rates for a contract that ends on April 30, 2020, of approximately \$8.5 million on a revenue requirement basis.

The Department also recommends that the Commission request that the following issues be addressed, along with any particular issues the Commission would like to see developed in this proceeding:

- Is the test year revenue increase sought by the Company reasonable, or will it result in unreasonable and excessive earnings?
- Is the rate design proposed by the Company reasonable?
- Are the Company's proposed capital structure, cost of capital, and return on equity reasonable?
- Did the Company demonstrate that its proposed base rates appropriately exclude Fuel Clause Adjustment-related costs, as required by the Commission's November 5, 2019 *Order* in Docket No. E999/CI-03-802?
- How does the issue of Large Market Wholesale Contract and possible replacement revenues affect final rates?

/ja

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
Comments**

Docket No. E015/GR-19-442

Dated this **12th** day of **November 2019**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-442_GR-19-442
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-442_GR-19-442
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_19-442_GR-19-442
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_GR-19-442
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-442_GR-19-442
Elizabeth	Brama	ebraa@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-442_GR-19-442
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-442_GR-19-442
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Paper Service	No	OFF_SL_19-442_GR-19-442
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_GR-19-442
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_GR-19-442
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_GR-19-442
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442

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_19-442_GR-19-442
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_GR-19-442
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_GR-19-442
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-442_GR-19-442
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_19-442_GR-19-442
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_19-442_GR-19-442
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_GR-19-442
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_19-442_GR-19-442
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442

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_19-442_GR-19-442
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_GR-19-442
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_GR-19-442
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-442_GR-19-442
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-442_GR-19-442
Tony	Mancuso	mancusot@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_19-442_GR-19-442
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442
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_19-442_GR-19-442
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_19-442_GR-19-442
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_GR-19-442
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-442_GR-19-442
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-442_GR-19-442
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_GR-19-442
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_GR-19-442
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_GR-19-442
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_19-442_GR-19-442
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_19-442_GR-19-442
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_GR-19-442
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_GR-19-442
Santi	Romani	N/A	United Taconite	P O Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_19-442_GR-19-442
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_GR-19-442
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_GR-19-442
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_GR-19-442
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_GR-19-442
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_GR-19-442
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_GR-19-442
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-442_GR-19-442
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_GR-19-442
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_GR-19-442
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_GR-19-442
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442_GR-19-442
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_GR-19-442
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_GR-19-442
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_GR-19-442
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-442_GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-442_GR-19-442