May 11, 2020

Mr. William Seuffert
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 Nos. E015/M-20-429 and E015/AA-19-302

Dear Mr. Seuffert:

Attached are the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in response the Minnesota Public Utilities Commission's (Commission's) Notice of Shortened Comment Period (Notice) dated April 28, 2020 in the following matter:

> Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case.

The Department recommends **approval,** and is available to answer any questions that the Commission may have.

Sincerely,

/s/ NANCY CAMPBELL
Analyst Coordinator

/s/ CRAIG ADDONIZIO
Financial Analyst

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E015/M-20-429 and E015/AA-19-302

I. INTRODUCTION

On November 1, 2019, Minnesota Power (or the Company) filed a general rate case in Docket No. E015/GR-19-442 (the 2019 Rate Case). The Company began collecting an interim rate increase of 5.80 percent on January 1, 2020. In the ensuing months, the severe acute respiratory syndrome coronavirus 2, which causes the disease COVID-19, has spread across the globe, a pandemic that in addition to causing widespread illness has resulted in a significant slowdown of the global economy.

On April 23, 2020, Minnesota Power filed a petition (Petition) with the Minnesota Public Utilities Commission (Commission) a proposal (Resolution Proposal) to resolve and ultimately withdraw the 2019 Rate Case. The Resolution Proposal mainly involves retaining the final rates set in the Company's last completed rate case (Docket No E015/GR-16-664, or the 2016 Rate Case), but with one significant adjustment that addresses a key driver of the 2019 Rate Case. On April 30, 2020, a large energy and capacity wholesale contract (Large Market Contract, or LMC) under which Minnesota Power sold energy and capacity to Basin Electric Power Cooperative expired. To address the expiration of the LMC, the Company has proposed to modify the method by which it reflects energy and capacity asset-based wholesale sales margins in rates, and to change the size of the credit reflected in current rates, effective May 1, 2020. If the Commission approves the Resolution Proposal, the Company committed to withdrawing the 2019 Rate Case and refunding to ratepayers all interim rates collected from January 1, 2020 through April 30, 2020.

On April 28, 2020, the Commission issued a Notice of Shortened Comment Period (Notice) with seven topics open for comment related to Minnesota Power's Petition and the Resolution Proposal.

On April 30, 2020, Minnesota Power filled a supplement (April 30 Supplement) to its Petition with additional details about the Resolution Proposal.

The Department provides its response to the Commission's Notice and analysis of the Resolution Proposal below.

II. DEPARTMENT ANALYSIS

The Commission's Notice included seven topics open for comment, which the Department addresses individually below.

A. *OPEN TOPIC NO. 1: SHOULD THE COMMISSION APPROVE MINNESOTA POWER'S REQUEST TO SHIFT RECOVERY OF THE COMPANY'S ENERGY AND CAPACITY ASSET-BASED WHOLESALE SALES MARGINS FROM BASE RATES TO ITS FUEL ADJUSTMENT CLAUSE (FAC OR FCA)?*

1. *Details of Minnesota Power's Proposal*

a.) *Proposed Changes to Base Rates and Fuel Adjustment Clause Rates*

In its Petition, Minnesota Power proposed to continue to charge its ratepayers the final base rates set in its last completed rate case, Docket No. E015/GR-16-664 (the 2016 Rate Case) for the first four months of 2020. Beginning May 1, 2020, the Company proposed to update the final base rates set in the 2016 Rate Case to reflect one significant change. Beginning May 1, the Company proposed to shift recovery of its energy and capacity asset-based wholesale sales margins (asset-based margins) from base rates to its fuel adjustment clause.

Asset-based margins are margins, or profits, earned from sales of energy and capacity supported by Minnesota Power's generating assets in rate base. Because those assets are included in rate base, ratepayers pay for them. Asset-based margins are included in rates as a credit, or decrease, to the Company's overall revenue requirement, to reflect the fact that the margins are generated using assets paid for by ratepayers. Asset-based margins are derived in part from Minnesota Power's uncontracted sales of energy into the Midcontinent Independent System Operator (MISO) Day 2 energy market, and in part from bilateral wholesale contracts the Company enters into, such as the LMC, to sell energy and/or capacity to specific counter parties. Final rates determined in the 2016 Rate Case include a revenue credit of $35.8 million (MN Jurisdictional) resulting from Minnesota Power's expected (at that time) asset-based margins.[1]

A large percentage of the $35.8 million asset-based margin credit included in the final rates set in the 2016 Rate Case resulted from the LMC, which, as noted above, expired on April 30, 2020. In its Petition, the Company stated that the expiration of this contract was a key impetus for its 2019 Rate Case, and aligns with the proposed May 1, 2020 start date for the changes to base rates and fuel clause rates MP has proposed.

[1] Petition at 10. Final rates determined in Minnesota Power's 2016 Rate Case in fact included an asset-based margin credit of $36.3 million, as identified in the Errata to Supplemental Direct Schedule 5 of Minnesota Power Witness Julie I. Pierce, filed April 21, 2017 in the 2016 Rate Case. The Company explained in an email that in its initial discussions of this proposed resolution to the 2019 Rate Case, it inadvertently used the $35.8 million ABM estimate reported in the Supplemental Direct Testimony of Ms. Pierce in the 2016 Rate Case in developing its proposal. Minnesota Power discovered the error after discussions with the other parties were well under way, and decided to continue to use the $35.8 million estimate in order to avoid confusion. Updating to the higher $36.3 million estimate would have resulted in higher base rates, by approximately $0.5 million.

The LMC had a term of multiple years, but the Company also has other contracts with much shorter terms, often a year or less. Minnesota Power regularly cycles through these contracts, such that the mix of contracts reflected the Company's estimate of asset-based margins in its 2019 Rate Case is significantly different from the mix of contracts reflected in the 2016 Rate Case's test year.

In its Resolution Proposal, the Company proposed to remove the $35.8 million asset-based margin credit from base rates set in the 2016 Rate Case, and move an estimated credit to its fuel adjustment clause. Specifically, largely to account for the expiration of the LMC, Minnesota Power proposed to adjust the size of the asset-based margin credit from $35.8 million down to $10.0 million. The $10.0 million estimate is based on the asset-based margin credit the Company proposed in the 2019 Rate Case, which reflected the Company's expectations about wholesale margins at the time it filed the 2019 Rate Case.[2] The $25.8 million difference is due largely, but not completely, to the expiration of the LMC. The updated estimate also reflects the Company's expected level of uncontracted sales into the MISO Day 2 market as well as margins expected from bilateral wholesale contracts that the Company expects to be in place during 2020 (the test year of the 2019 Rate Case).

The total base rate revenue requirement determined in the 2016 Rate Case was $623.1 million.[3] Removal of the $35.8 million asset-based margin credit from base rates increases the total base rate revenue requirement to $658.9 million, an increase of 5.75 percent. To effect this increase, MP proposed to increase the base energy rate for each customer class such that total revenue from each class would increase by 5.75 percent. In other words, Minnesota Power proposed to allocate the $35.8 million increase in base rates across its customer classes using each class's share of total revenue responsibility to calculate each class's share of the increase. This process is described in Attachment E to the Company's April 30 Supplement, and the resulting increases to each customer class's base energy rates are shown Attachment A to the April 30 Supplement.

To reflect asset-based margins in its fuel adjustment clause rates, Minnesota Power added its expected margins (reduction in net costs) to the fuel cost forecast approved in Docket No. E015/AA-19-302 to derive updated monthly FAC rates. MP then adjusted the monthly rates for each customer class using the E8760 energy allocator to derive the applicable monthly rates for each class. The Company's process is described in more detail in Attachment B in the April 30 Supplement.

b.) Other Aspects of MP's Proposal

i. Stay Out Provision

Minnesota Power stated that if the Commission approves its Petition, it will agree to not file another rate case before March 1, 2021 under any circumstances. In addition, MP stated that it will agree not to file another rate case before November 1, 2021, unless one of its Energy-Intensive Trade-Exposed

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[2] See the Direct Testimony of Julie I. Pierce in the 2019 Rate Case, Schedule 1, page 11.
[3] See Petition, Attachment A, Column titled "December 31, 2019 Rates."

(EITE) customers shuts down or idles at least 50 megawatts (MW) below their actual load as of April 20, 2020 for a period of three months. The Company stated that this exception is "necessary in the event Minnesota Power has no choice but to seek rate relief due to extenuating circumstances beyond its control."[4] The Company also stated that if a loss of EITE load prompts it to file a rate case prior to November 1, 2021, it will provide at least 90 days written notice to the Commission before filing. At this point, it is not known whether that trigger threshold will be reached.

ii. Energy Intensive Trade Exposed Rate

In its Order dated December 21, 2016 in Docket No. E015/M-16-564 (2016 EITE Order), the Commission approved an EITE Rate Rider that provides an Energy Charge Credit (EITE Rate Discount) to MP's eligible EITE customers. The 2016 EITE Order limited the EITE Rate Discount to a four-year term. MP implemented the EITE Rate Discount on February 1, 2017, and thus per the EITE Order, the EITE Rate Discount was originally scheduled to expire on February 1, 2021.

In its Order dated March 17, 2020 in Docket No. E015/M-16-564 (2020 EITE Order), the Commission extended the term of the EITE Rate Discount to last until final rates in the 2019 Rate Case take effect, with the condition that Minnesota Power is prohibited from recovering any EITE-related costs through a surcharge on non-exempt, non-EITE customers after February 1, 2021.

As noted above, if the Commission approves the Resolution Proposal, Minnesota Power will withdraw its rate case, and no final rates will be determined or take effect. Therefore, the Company proposed in its Petition to reinstate the original expiration date the EITE Rate Discount of February 1, 2021. The Company stated in its Petition that its intention is to maintain the status quo with respect to the EITE Rate Discount. In its response to an information request (IR) from the Office of the Attorney General – Residential Utilities and Antitrust Division (OAG), the Company further explained that "[g]iven that there was no consensus among stakeholders as to how EITE should be addressed, the Company decided to not make a proposed change to existing Commission orders on EITE and rather allow this issue to be decided in the EITE docket."[5] Minnesota Power also stated that its Petition is not intended to change any party's opportunity to propose in other dockets to extend or modify the EITE rate beyond February 1, 2021.

iii. Other Residential Rate Design Issues

Over the past few years, Minnesota Power and many other stakeholders have been studying ways to modify the Company's rate design, with a specific focus on the Company's residential rates, in Docket No. E015/M-12-233 (Rate Design Docket). Among other things, the parties have been studying the potential impacts of transitioning from Minnesota Power's current inverted block rate (IBR) structure for residential energy rates to a flat energy rate, and later introducing a time-varying rate design. In its

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[4] Petition at 17.
[5] See Attachment 1.

2019 Rate Case, the Company proposed to transition away from the current IBR structure of its residential energy charges to a flat energy charge, based at least in part on the discussions in the Rate Design Docket.[6] If the Commission approves Minnesota Power's Resolution Proposal, the rate design from the 2016 Rate Case, including the IBR structure for residential base energy rates, will be maintained. In response, the Company proposed in its Petition to continue work with stakeholders to identify other revenue neutral residential rate design options in the Rate Design Docket, and potentially implement changes prior to the conclusion of its next rate case.

2. Department Analysis

a.) Proposed Changes to Base Rates and Fuel Adjustment Clause Rates

The Department concludes that Minnesota Power's proposal to shift recovery of its energy and capacity asset-based wholesale margins from base rates to its Fuel Adjustment Clause is reasonable, and recommends that the Commission approve it, for the reasons explained below.

First, as explained in the Petition, Minnesota Power's proposed treatment of asset-based margins is consistent with how Xcel Energy and Otter Tail Power Company treat asset-based margins.

Second, as explained above, and as shown in Attachment A to the Company's Petition, if the Commission were to approve Minnesota Power's Resolution proposal, ratepayers would effectively see no rate increase for the first four months of 2020, and a 4.1 percent increase for the remaining eight months of 2020. This would equate to an average increase of 2.8 percent for calendar year 2020. Similarly, for the 13-month period January 1, 2020 through February 1, 2020, when the EITE Rate Discount is set to expire per the terms of the Resolution Proposal, Minnesota Payer's ratepayers would pay roughly 2.9 percent more relative to base rates determined in the 2016 Rate Case.[7]

If the Commission were to deny the Resolution Proposal and require parties to continue with the 2019 Rate Case, for the 13-month period ending February 1, 2020, Minnesota Power's ratepayers would pay less in total revenue for electric service than they would under the Resolution Proposal only if the outcome of the 2019 Rate Case were a rate increase of less than 2.9 percent. If the outcome were an increase of 2.9 percent, total revenue paid by ratepayers during the 13 months would ultimately be equal to total expected revenue under the Resolution Proposal, but even in that case ratepayers would be better off under the terms of the Resolution Proposal due to the more immediate refunds they would receive. If parties were to continue with the 2019 Rate Case, ratepayers would likely not receive any potential interim rate refunds until mid-2021.

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[6] See the Direct Testimony of Marcia A. Podratz in the 2019 Rate Case beginning at 59.
[7] Calculated as [(4 months x 0% increase) + (9 mos. x 4.1% increase)]/13 mos. = 2.9%.

It is difficult to quantify the value of the relative immediacy of refunds that would be provided under the terms of the Resolution Proposal, but it is clear that the outcome of the 2019 Rate Case would have to be an increase of notably less than 2.9 percent to be comparably favorable. While such an outcome in the 2019 Rate Case is certainly possible, the Department concludes that such a small increase is sufficiently unlikely that the Resolution Proposal is the superior outcome. Additionally, because the Resolution Proposal retains the rate design from the 2016 Rate Case, it includes lower overall revenues and the same rate design as would be in effect if litigation were to be continued in the 2019 Rate Case. Therefore, it is likely that not only would ratepayers as a whole bet better off under the Resolution Proposal versus continuing with the 2019 Rate Case, but each customer class individually would be better off.

Beyond February 1, 2021, whether ratepayers generally and individual rate classes would be better off under the Resolution Proposal versus continuing with the 2019 Rate Case depends on a number of variables, including but not limited to:

- the final rate increase determined in the 2019 Rate Case if that rate case were litigated to conclusion;
- the final rate design in the 2019 Rate Case, and in particular, whether and how the final rate design is influenced by the planned expiration of the EITE Rate Discount;
- if the Resolution Proposal is approved, whether the EITE Rate Discount is extended and whether EITE revenue falls below the baseline 2016 EITE Revenue level, which could result in the Company's non-exempt, non-EITE customers being surcharged.

Because of these uncertainties and complexities, and the fact that the expiration of the EITE Rate Discount will remain under the Commission's control while the Resolution Proposal is in effect, it is not possible to fully assess whether ratepayers would be better off if the Commission approved the Resolution Proposal versus continuing to litigate the 2019 Rate Case.

b.) Risk to Ratepayers Under the Resolution Proposal

Shifting recovery of asset-based margins from base rates to the fuel adjustment clause shifts the burden of risks associated with those asset-based margins from Minnesota Power to its ratepayers. If the Commission were simply to reduce the asset-based margins credit included in base rates from the current $35.8 million down to $10.0 million, but leave them in base rates, (i.e. not shift recovery to the fuel adjustment clause), Minnesota Power would bear the risk of its actual asset-based margins being less the $10.0 million. If asset-based margins turned out to be greater than $10.0 million, the Company would retain the positive difference for the benefit of shareholders.

Because recovery of asset-based margins would be shifted from base rates to the fuel adjustment clause under the terms of the Resolution Proposal, the difference between expected asset-based ($10.0 million) and actual asset-based margins will be subject to true-up next year in the Company's fuel clause forecast docket. Ratepayers would bear the extra cost burden if actual asset-based margins turn out to be less than $10.0 million, but would enjoy the benefits if actual margins turn out to be greater than $10.0 million.

As noted above, the $10.0 million asset-based margin credit the Company proposed to reflect in its fuel clause adjustment represents the Company's estimate for 2020 from the 2019 Rate Case. As such, it reflects Minnesota Power's pre-COVID-19 pandemic expectations for market sales, and current conditions in the wholesale electricity markets indicate that the Company may have difficulty achieving its previously-expected level of wholesale sales. For example, a portion of Minnesota Power's expected 2020 asset-based margins are derived from uncontracted spot energy sales into the MISO Day 2 market.[8] MISO recently estimated that, after adjusting for actual weather, load across the MISO footprint was 5-10 percent lower than expected over the period March 13 through April 17, 2020, and attributed the impact to COVID-19.[9] If these low-load conditions persist, it may prevent Minnesota Power from achieving the level of MISO Day 2 sales reflected in the $10.0 million asset-based margin credit.[10]

The Department notes, however, that even if actual asset-based margins for 2020 turn out to be only $5.0 million, the increase in revenue for the test year would be only 3.3 percent. Thus, ratepayers would be better off litigating the 2019 Rate Case relative to the Resolution Proposal only if the final rate case outcome were a rate increase of less than 3.3 percent. In addition, as described above, the rate case outcome would have to be an increase significantly lower than 3.3 percent in order to compensate for the benefits associated with the faster refund under the Resolution Proposal. Further, the Department's review of the Company's filings in the 2019 Rate Case indicated that the $10.0 million test year asset-based margin estimate may have been an underestimate of wholesale margins. For these reasons, the Department concludes that the benefits of the Resolution Proposal outweigh risks associated with shifting asset-based margins from base rates to the fuel adjustment clause.

B. OPEN TOPIC NO. 2: SHOULD MINNESOTA POWER BE AUTHORIZED TO CHANGE BASE RATES, AS REQUESTED, AS A RESULT OF THIS DOCKET RATHER THAN IN A RATE CASE?

Yes. Minnesota Power should be authorized to change base rates in this Docket, rather than in a rate case.

The Department acknowledges that Minnesota Power's Resolution Proposal, and the procedure being used to make the proposal, are unusual. However, the circumstances in which the Company is making its Resolution Proposal (i.e. the COVID-19 pandemic) are also unusual. Under the circumstances, it is reasonable and appropriate for the Commission to authorize the Company to change its base rates in this Docket rather than the rate case. Further, MP's proposed process complies with the Commission's rules.

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[8] See Pierce Direct, Schedule 1 at 11 in the 2019 Rate Case.
[9] See MISO's April2 28, 2020 Summer Readiness Workshop presentation, available on its website, slides 28-36.
[10] Minnesota Power would be able to true-up actual wholesale margins with actual amounts in the fuel clause true-up.

As described above, under the terms of the Resolution Proposal, Minnesota Power would continue to charge its ratepayers the base rates set in the 2016 Rate Case, with two significant changes. First, Minnesota Power would shift recovery of asset-based margins from base rates to the fuel adjustment clause. Second, Minnesota Power would reduce the size of the asset-based margin credit from $35.8 million to $10.0 million.

Only the first of these two changes affects Minnesota Power's base rates, and it does not require a complete reevaluation of Minnesota Power's revenue requirements. Rather, it is simply a shift of a revenue credit from one rate mechanism to a different rate mechanism. The effect of this shift is essentially to provide the Company with a true-up mechanism for asset-based margins, and thus has some similarities to the Xcel Energy's proposal in its Petition for Approval of True-Up Mechanisms approved by the Commission in Docket No. E002/M-19-688. Based on these facts, the Department concludes that Minnesota Power should be authorized to change its base rates in this Docket, rather than in a rate case.

C. OPEN TOPIC NO. 3: SHOULD THE COMMISSION APPROVE THE PETITION WITHIN THE REQUESTED 45 DAY WINDOW?

Yes. The Commission should approve the Petition within the requested 45-day window.

As described in Minnesota Power's Petition, the intent of the Resolution Proposal is to quickly provide rate relief to its ratepayers while protecting the Company's financial health in light of the COVID-19 pandemic. As also described in the Company's Petition, if the Commission denies the Resolution Proposal, litigation in the 2019 Rate Case must resume; an expedited process would minimize the delay in that proceeding. Additionally, as described in the Company's Petition, discussion of the Resolution Proposal began on an informal, but structured and inclusive basis in late March, meaning that interested parties have had longer to consider the Company's proposal than the expedited timeline suggests.

D. OPEN TOPIC NO. 4: DOES THE COMMISSION-APPROVED 2020 FCA ALLOW FOR IMPLEMENTATION OF MID-YEAR CHANGES OF THIS NATURE, IN THIS DOCKET, WITHOUT COMMISSION APPROVAL?

As described above, under the terms of the Resolution Proposal, Minnesota Power would continue to charge its ratepayers the base rates set in the 2016 Rate Case, with two significant changes. First, Minnesota Power would shift recovery of asset-based margins from base rates to the fuel adjustment clause. Second, Minnesota Power would reduce the size of the asset-based margin credit from $35.8 million to $10.0 million. The Department addressed the first change above and addresses the second change immediately below.

Generally, mid-year changes to a utility's fuel cost forecast and fuel clause rates are most appropriately considered in a utility's most recent fuel forecast docket.[11] However, in its Petition, Minnesota Power proposed to make the change in this Docket given its potential impact on its 2020 Fuel Forecast Report Docket as well as the 2019 Rate Case.[12] The Department agrees that given the current circumstances, and the impacts on multiple dockets, the Company's approach is reasonable. Additionally, the Department notes that Minnesota Power served a summary of its Petition on all parties listed on the service list in the 2020 Fuel Forecast Report Docket and these comments are also filed in that docket; thus all parties to that Docket have the opportunity submit comments.

Minnesota Power's proposal to modify its 2020 fuel cost forecast and fuel adjustment clause rates is consistent with the intention of the Commission's June 12, 2019 Order in Docket No. E,G999/CI-03-802 (the June 2019 FCA Order). The June 2019 FCA Order permits a utility to modify its fuel cost forecast and rates if four conditions are met. Utilities bear the burden to show that:

(1) events or circumstances cause an increase or decrease of at least five percent in the fuel costs used to set the FCA rate;
(2) the events or circumstances were unforeseeable and outside of the utility's control;
(3) the events or circumstances are expected to continue for the remainder of the year; and
(4) the resulting costs (or savings) are reasonable to pass on to ratepayers.

As shown in Attachment B of Minnesota Power's April 30 Supplement, total fuel costs used to develop the Company's FAC rates were $233.4 million. On an annualized basis, the net change to fuel costs resulting from the shift of asset-based margins into the fuel clause is expected to be $10.0 million, or 4.3 percent of the Company's total forecasted fuel cost. However, an alternative way of viewing the changes to fuel cost forecast resulting from the Resolution Proposal is, first, an increase of $35.8 million to reflect the shift of asset-based margins from base rates to the fuel clause, followed by a $25.8 million decrease to reflect the updated estimate of asset-based margins. Both of those changes individually satisfy the five-percent threshold.

In light of the enormous stress caused by the COVID-19 pandemic, the Department concludes that if the Commission prefers to consider the $10.0 million net change in fuel costs, it is reasonable in this instance to vary the five-percent threshold set in the Commission's June 2019 FCA Order to allow this smaller change to be implemented. Alternatively, given the extreme circumstances, it would also be reasonable to consider the $35.8 million increase and $25.8 million decrease to fuel costs individually, as both changes easily clear the five-percent threshold.

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[11] Minnesota Power's most recent fuel forecast docket is Docket No. E015/AA-19-302 (2020 Fuel Forecast Report Docket).
[12] Petition, page 14.

In its Petition, the Company explained that while asset-based margin credits are a routine and known credit, the COVID-19 pandemic and resulting economic downturn that prompted the proposed changes to the Company's fuel forecast were unforeseeable and outside of Minnesota Power's control. The Department agrees that margin credits, as well as the expiration of the LMC, are routine and known, but also agrees that Minnesota Power could not have foreseen that a pandemic was going to spur it to shift asset-based margin credits into the fuel clause. Therefore, the Department concludes that the second condition has been met.

The Department also agrees that because asset-based margin credits would remain in the fuel clause for the remainder of the year, the third condition has been meet.

Lastly, the Department agrees that it is reasonable to pass on to ratepayers the change in fuel costs associated with shifting asset-based margins to the fuel clause. As noted by the Company, both Xcel Energy and Otter Tail Power Company already include asset-based margin credit in their fuel clause rates. Further, while the Department recognizes that the Resolution Proposal shifts the risks associated with asset-based margin credits to ratepayers at a time when those risks are heightened relative to recent history, the risks are still outweighed by the benefits of the Resolution Proposal.

With respect to Commission approval, the June 2019 FCA Order allows for implementation of mid-year changes prior to receiving Commission approval if no party objects to a proposed change within 30 days of a utility's request for a change. However, Commission approval is ultimately required, and even if no party objects, the Commission may still deny the change after implementation, in which case the utility would be required to refund to ratepayers any overcollection that occurs while the revised rate is in effect.

In this specific instance, however, Commission approval is required for Minnesota Power to shift recovery of asset-based margins from base rates to the fuel clause adjustment, and the Commission will consider that change at the same time it considers the reduction of the Company's asset-based margins from $35.8 million to $10.0 million. Therefore, there is no reason why the proposed change to Minnesota Power's 2020 FCA should occur without Commission approval.

E. OPEN TOPIC NO. 5: MINNESOTA POWER'S COMMITMENT TO WITHDRAW ITS CURRENT RATE CASE AND NOT FILE A REQUEST FOR AUTHORITY TO INCREASE ELECTRIC SERVICE RATES BEFORE NOVEMBER 1, 2021, EXCEPT IN THE EVENT OF CERTAIN UNEXPECTED CIRCUMSTANCES.

As described above, the Department concludes that Minnesota Power's Resolution Proposal is reasonable largely due to the fact that, if it is approved, during the 13 months ending February 1, 2021, ratepayers are very likely to be better off relative to continuing to litigate the 2019 Rate Case. Minnesota Power's commitment to not file a rate case prior to March 1, 2021 under any circumstances ensures that benefits associated with Resolution Proposal will be realized. Without this commitment, Minnesota Power could simply file a new rate case with interim rates that are higher than they are now, which would be more harmful to ratepayers than normal due to the financial and health stresses brought on by the COVID-19 pandemic.

Additionally, at least two other utilities are planning to file rate cases in late 2020, and Minnesota Power's commitment to not file until at least March 1, 2021 helps alleviate some of the administrative, scheduling, and workload concerns associated with having multiple rate cases at one time.

F. *OPEN TOPIC NO. 6: MINNESOTA POWER'S PROPOSAL TO DEFER RESIDENTIAL RATE DESIGN ISSUES TO THE TIME-OF-USE RESIDENTIAL RATES DOCKET (DOCKET NO. E-015/M-12-233) AND TO MAINTAIN THE CURRENT EITE RIDER RATE DISCOUNT THROUGH FEBRUARY 1, 2021.*

1. *Residential Rate Design*

As discussed above, Minnesota Power and other stakeholders have been discussing potential changes to its residential rate design in the Rate Design Docket, and the Company proposed incremental changes to its residential rate design in the 2019 Rate Case based in part on those discussions. If the Commission approves the Resolution Proposal, the Company would not implement those changes, but rather would retain the rate design approved in the 2016 Rate Case.

The Company proposed to continue the stakeholder process in the Rate Design Docket to address residential rate design issues and identify rate design options that are revenue neutral and further the goals such changes are intended to achieve.

The Department agrees that Minnesota Power's proposed approach is reasonable, as it allows discussions related to rate design to continue, and potentially result in changes to the Company's rate design, without hindering the Company's efforts to resolve its 2019 Rate Case and provide immediate relief to its ratepayers.

2. *EITE Rate Discount*

As part of the Resolution Proposal, Minnesota Power proposed to maintain the EITE Rate Discount until February 1, 2021, the original expiration date per the Commission's December 21, 2016 Order in in Docket No. E015/M-16-564 (the EITE Docket). The Company stated that its intention is to maintain the status quo to simplify the Commission's decision on its Resolution Proposal, but still allow interested parties to propose in other dockets to extend or modify the EITE Rate Discount beyond February 1, 2021.

The EITE Rate Discount is a complex issue, and there is simply not enough time fully develop the issues surrounding extending or modifying it in this Docket. However, the Department recognizes that expiration of the EITE Rate Discount would result in a rate increase for the Company's EITE customers, and Minnesota Power's withdrawal of its rate case prevents those customers from arguing for changes that may mitigate that increase. Because of this, the Department concludes that Minnesota Power's proposed approach of reinstating the original expiration date of the EITE Rate Discount and allowing interest parties to propose to extend or modify the EITE Rate Discount before it expires, but outside of this Docket, is reasonable.

G. OPEN TOPIC NO. 7: ARE THERE OTHER ISSUES OR CONCERNS RELATED TO THIS MATTER?

The Department has no other issues or concerns related to this matter to bring to the Commission's attention.

III. CONCLUSION

The Department concludes that Minnesota Power's Resolution Proposal is reasonable and recommends that the Commission approve it. As noted in the Company's Petition, if the Commission approves the Resolution Proposal, Minnesota Power would need to file red-lined and clean versions of the affected pages from the Company's Electric Rate Book, as well as other compliance filings related to refunds.

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OAG No. 6004

State Of Minnesota
Office of the Attorney General
Utility Information Request

Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota	**MPUC Docket No.**	E-015/GR-19-442
Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case	**MPUC Docket No.**	E-015/M-20-429

Requested from: Minnesota Power

Requested By:	Peter Scholtz	**Date of Request:**	April 28, 2020
Telephone:	(651) 757-1473	**Due Date:**	May 8, 2020

Reference: "Proposed Rate Case Resolution Impacts by Rate Class - DRAFT - April 10 2..." at page 1.

In the fourth bullet under Step 1, MP states, "Energy rate increase of $0.00355/kWh for Large Power assumes separate EITE credit continues. Without the EITE credit, the LP base rate increase would be reduced to $0.00036/kWh. Whether the EITE credit continues or not, the revenue/cost impacts by class are not changed."

a. Explain how MP calculated the alternative Large Power base-rate increase of $0.00036/kWh.
b. What percent increase does $0.00036/kWh represent over nondiscounted Large Power base rates (without the EITE credit)?
c. Why does removal of the EITE credit from base rates reduce the Large Power rate increase rather than making it larger? Doesn't removing the credit from base revenues result in a higher baseline to which to apply the overall 5.75% increase?
d. Why are revenue/cost impacts by class unaffected by whether the EITE credit continues?

RESPONSE:

Minnesota Power objects to this request to the extent that it seeks information regarding preliminary data that was developed for purposes of settlement negotiations between the parties. Minnesota Power further objects to this request to the extent that this preliminary data that was shared with parties as part of settlement negotiations is not consistent with the final proposal put forth by Minnesota Power in its April 23, 2020 Emergency Petition for Approval to Move Asset-

Witness:	Marcia Podratz
Response by:	Darrin Zwak/ David Moeller
Title:	Costing and Pricing Analyst/ Senior Attorney and Director of Regulatory Compliance
Department:	Rates/ Legal
Telephone:	218-355-3098/ 218-723-3963

Based Wholesale Sales Margin Credits to the Fuel Adjustment Clause and Resolve the Rate Case ("Petition") filed in Docket No. E015/M-20-429.

Subject to and without waiving the foregoing objections, Minnesota Power responds as follows:

Before responding to this request it is helpful to have additional background regarding the Commission-approved energy-intensive, trade-exposed ("EITE") rate, authorized under Minn. Stat. § 216B.1696. The EITE rate is a discount offered to eligible large commercial customers of Minnesota Power. The EITE Statute, Minn. Stat. §216B.1696, requires the Commission to allow a utility that offers an EITE customer rate the ability to recover the revenue that the utility was no longer collecting from EITE customers because of (or to refund additional revenues resulting from) the discount from non-EITE, non-low income, customers. Minn. Stat. § 216B.1696, subd. 2(d). The Commission has ordered Minnesota Power to establish a tracker to account for both the additional revenue and the lost revenue associated with the EITE customer rate, so that any differential could be recovered or returned to customers as needed through the Company's EITE Surcharge Rider.

As stated above, the referenced file with the April 10 date was shared as part of preliminary discussions with stakeholders as the Company sought to develop and gain support for a rate case resolution. These numbers differed from the customer impact numbers submitted in the Petition. A small correction was made to the E-schedule models, which are the basis for calculating the impacts by customer class that were previously shared with stakeholders. The correction did not change the percentage outcome by customer class, but did slightly change the proposed revenue and energy rate increases for the LP class. The reason for the change was the logic for calculating the Excess ADIT credit for LP customers was inadvertently linked to the "current rates" amount, rather than calculating a new amount for the rate case resolution.

Another difference made to the referenced file is that the Company removed a column of customer impacts without the EITE credit. As described above, the base rates used for the Company's resolution proposal were predicated on the existence of EITE as ordered by the Commission. Minnesota Power decided, after consulting with stakeholders, to not address EITE as part of its rate case resolution proposal. Given that there was no consensus among stakeholders as to how EITE should be addressed, the Company decided to not make a proposed change to existing Commission orders on EITE and rather allow this issue to be decided in the EITE docket. Existing Commission orders set the timing of EITE to continue to February 2021. Because EITE was not part of the rate case resolution, the column of customer impacts without the EITE credit was removed from the referenced file.

When the Company evaluated the EITE impact in its April 10 customer impact file, it treated EITE consistent with the way it was treated in calculating the interim rate increase in the current rate case: the EITE rider was combined with base rate revenues. Removing the EITE credit from base rate revenues would only affect the LP customer class, since other customer classes

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Response by:	Darrin Zwak/ David Moeller
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have not been contributing to the EITE credit. Therefore, increasing non-LP customer classes by 5.75% would result in the same revenues with or without the EITE credit.

And the impact of removing the EITE credit on the LP customer class would result in a smaller energy rate increase needed to reach the 5.75% LP base rate revenue increase, because the removal of the credit ($16.9 million) makes up most of the 5.75% increase to Large Power revenue ($18.7 million).

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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/M-20-429 and E015/AA-19-302

Dated this **11th** day of **May 2020**

/s/Sharon Ferguson

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David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_20-429_M-20-429
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Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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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_20-429_M-20-429
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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_20-429_M-20-429
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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