

**STATE OF MINNESOTA  
PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Joseph Sullivan	Vice-Chair
Audrey Patridge	Commissioner
Hwikwon Ham	Commissioner
John Tuma	Commissioner

**In the Matter of Minnesota Power’s  
Petition for Approval of Modifications to  
its Large Power Tariff**

**Docket No. E015/M-26-126**

**REPLY COMMENTS OF SIERRA CLUB, MINNESOTA  
CENTER FOR ENVIRONMENTAL ADVOCACY,  
ENVIRONMENTAL LAW & POLICY CENTER AND VOTE SOLAR**

Sierra Club, Minnesota Center for Environmental Advocacy (“MCEA”), Environmental Law & Policy Center (“ELPC”) and Vote Solar respectfully submit these Reply Comments on Minnesota Power’s Petition for Approval of Modifications to its Large Power Tariff.

The Initial Comments of the Clean Energy Organizations<sup>1</sup> recommended that the Commission reject Minnesota Power’s proposal to serve new very large customers such as data centers under its existing Large Power Tariff, which does not meet the requirements of Minnesota Statute Section 216B.1622, and that the Commission require Minnesota Power to create a new, separate very large customer class and tariff that complies with the statute and addresses the needs and risks presented by data centers. On May 19, 2026, Minnesota Power withdrew its petition to rely on the existing Large Power Tariff and instead indicated that it would submit a new petition to create a new very large customer class and tariff by mid-summer 2026. In this same filing, Minnesota Power asked the Commission not to delay consideration of Minnesota Power’s proposed Electric Service Agreement (“ESA”) to serve Google’s Hermantown data center, which is pending in Docket No. No. E-015/M-26-159.

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<sup>1</sup> These Reply Comments are submitted only by Sierra Club, MCEA, ELPC and Vote Solar, and not on behalf of any other parties. Other parties that signed the Clean Energy Organizations’ May 8, 2026 Initial Comments in this docket are not joining in these Reply Comments.

Sierra Club, MCEA, ELPC and Vote Solar support the recommendation of the Citizens Utility Board (“CUB”)<sup>2</sup> and the Office of the Attorney General – Residential Utilities Division (“OAG”)<sup>3</sup> that the Commission should require Minnesota Power to establish a very large customer tariff first, before it makes a decision on Minnesota Power’s proposed ESA with Google. Approving the Minnesota Power/Google ESA before an underlying very large customer tariff has been developed would put the cart before the horse. Minnesota Power must define “very large customer” and create an underlying very large customer tariff which establishes consistent, generally applicable safeguards to protect existing ratepayers from the costs and risks associated with serving new very large customers through a single process, creating a uniform baseline, before negotiating project-specific protections via ESAs for individual data center projects.

We respectfully recommend that the Commission:

- (1) Approve the withdrawal of, and not consider, Minnesota Power’s prior proposal to allow new very large customers to utilize the existing Large Power Tariff.
- (2) Order Minnesota Power to create a separate customer class and tariff for very large customers that meets the requirements of Minn. Stat. §216B.1622 and contains the terms necessary to protect existing ratepayers from the stranded cost risks associated with very large customers.
- (3) Not render a final decision on Minnesota Power’s proposed ESA with Google until Minnesota Power has established a separate very large customer class and tariff.

Dated May 19, 2026

Respectfully Submitted,

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<sup>2</sup> CUB Initial Comments (May 8, 2026) at 3-4, 12.

<sup>3</sup> OAG Initial Comments (May 8, 2026) at 15-17.

**CERTIFICATE OF SERVICE**

I, Joaquin Garcia, hereby certify that I have this day served copies of the enclosed document on the attached list of persons by electronic filing.

**Reply Comments of Sierra Club, Minnesota Center for Environmental Advocacy,  
Environmental Law & Policy Center, and Vote Solar, Docket No. E-015/M-26-126**

Dated this 19<sup>th</sup> day of May, 2026

/s/ Joaquin Garcia

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 26-126
6	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	Official 26-126
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 26-126
8	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	Official 26-126
9	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 W Superior St, Duluth, MN, 55802 Duluth MN, 54534 United States	Electronic Service		No	Official 26-126
10	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 26-126
12	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 26-126
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 26-126
14	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN,	Electronic Service		No	Official 26-126

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				