

August 28, 2025

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

RE: Response Letter of the Minnesota Department of Commerce
Docket No. E015/AA-25-64

Dear Mr. Bull:

On May 1, 2025, Minnesota Power (MP or the Company) filed its [2026 Annual Forecasted Fuel and Purchased Energy Rates](#) for the calendar Year 2026 with the Minnesota Public Utilities Commission (Commission).

On June 24, 2025, the Minnesota Department of Commerce (Department) filed [Comments](#) recommending the Commission approve the Company's 2026 Fuel Forecast, subject to a subsequent true-up, and pending the results of the Midcontinent Independent System Operating (MISO) Planning Resource Auction (PRA) provided by MP in Reply Comments.

On July 31, 2025, the Company filed [Reply Comments](#), stating that the results of the MISO PRA for June 2025 through May of 2026 were filed in MP's new Capacity and Revenue Expense (CRE) Rider on May 1, 2025.¹ The CRE Rider is part of the Company's implementation of its 2023 rate case [Compliance Filing](#). MP notes that with final rate implementation on March 1, 2025, short-term capacity revenues (previously included in the Fuel Adjustment Clause Forecast) and short-term expenses (previously included in base rates), were transitioned to the new CRE Rider. The Department has reviewed the CRE Rider and notes MP will update the MISO planning year of monthly CRE Rider rates on May 1 of each year, shortly after the MISO PRA results become available.²

¹ *In the Matter of Minnesota Power's Petition for Approval of the Annual Capacity Revenue and Expense Rider for the period of June 2025 through May 2026*, Minnesota Power, Initial Filing, May 1, 2025, Docket No. E015/AA-25-221, (eDockets) [20255-218441-01](#), at Attachment 1, p. 1, lines 1c and 3c.

² MP states on page 5 the rates will be presented at: <https://www.mnpower.com/CustomerService/YourBill>

Mike Bull
August 28, 2025
Page 2

On July 2, 2025, the Department filed [Comments](#) in the CRE Rider docket, recommending the Commission find the forecasted capacity revenue amounts included in Attachment 1 of the Petition to be reasonable. This docket is pending Commission review.

The Department notes MP did not make any changes to the 2026 Fuel Forecast and Purchased Energy rates in its Reply Comments. As a result, the Department recommends the Commission approve Minnesota Power's 2026 Fuel Forecast, subject to a subsequent true-up, and is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JT/ad
Attachment

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
Letter**

Docket No. E015/AA-25-64

Dated this **28th** day of **August 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	AA-25-64
2	Jorge	Alonso	jorge.alonso@state.mn.us		Public Utilities Commission	121 7th Place East Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	AA-25-64
3	Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	AA-25-64
4	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	AA-25-64
5	Jason	Bonnett	jason.bonnett@state.mn.us		Public Utilities Commission	121 East 7th Place suite 350 St. Paul MN, 55101 United States	Electronic Service		No	AA-25-64
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
7	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	AA-25-64
8	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
9	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	AA-25-64
10	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	AA-25-64
11	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
12	David	Cartella	david.cartella@cliffsnr.com	Cliffs Natural Resources Inc.		200 Public Square Ste 3300 Cleveland OH, 44114-2315 United States	Electronic Service		No	AA-25-64
13	Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper		115 SW First St Grand Rapids	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55744 United States				
14	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	AA-25-64
15	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	AA-25-64
16	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
17	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
18	Patrick	Cutshall	pcutshall@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
19	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	AA-25-64
20	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-64
21	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-64
22	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-64
23	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	AA-25-64
24	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	AA-25-64
25	Frank	Frederickson	ffrederickson@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN,	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802 United States				
26	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	AA-25-64
27	John	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA		700 Lonsdale Building 302 W Superior St Ste 700 Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
28	Barbara	Gervais	toftemn@boreal.org	Town of Tofte		P O Box 2293 7240 Tofte Park Road Tofte MN, 55615 United States	Electronic Service		No	AA-25-64
29	Jerome	Hall	hallj@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept		Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth MN, 55802-1209 United States	Electronic Service		No	AA-25-64
30	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	AA-25-64
31	Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	AA-25-64
32	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
33	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	AA-25-64
34	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
35	James	Jarvi		Minnesota Ore Operations - U S Steel		P O Box 417 Mountain Iron MN, 55768 United States	Paper Service		No	AA-25-64
36	Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law		2950 Yellowtail Ave. Marathon FL, 33050 United States	Electronic Service		No	AA-25-64
37	Kelsey	Johnson	kjohnson@taconite.org	Iron Mining Association of Minnesota		1003 Discovery Drive Chisholm MN, 55719 United States	Electronic Service		No	AA-25-64
38	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Suite 1200 Minneapolis MN, 55402 United States				
39	Sarah	Johnson Phillips	sjphillips@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
40	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
41	Nicolas	Kaylor	nkaylor@mojlaw.com			120 South 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
42	Travis	Kolari		Keetac		PO Box 217 Keewatin MN, 55753 United States	Paper Service		No	AA-25-64
43	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
44	Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora		16 W 2nd Ave N PO Box 160 Aurora MN, 55705 United States	Electronic Service		No	AA-25-64
45	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
46	David	Langmo	david.langmo@sappi.com	Sappi North America		P O Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	AA-25-64
47	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
48	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
49	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	AA-25-64
50	LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association		P.O. Box 101 Two Harbors MN, 55616 United States	Electronic Service		No	AA-25-64
51	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for		1919 University Avenue West	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Environmental Advocacy		Suite 515 Saint Paul MN, 55104-3435 United States				
52	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AA-25-64
53	Patrick	Loupin	patrickloupin@packagingcorp.com	Boise Cascade Corporation		PO Box 990050 Boise ID, 83799-0050 United States	Electronic Service		No	AA-25-64
54	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
55	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	AA-25-64
56	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
57	Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American		255 State Street Floor 4 Boston MA, 02109-2617 United States	Electronic Service		No	AA-25-64
58	Emily	Marshall	emarshall@lourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
59	Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America		PO Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	AA-25-64
60	Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro		360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg MB, R3C 2P4 Canada	Electronic Service		No	AA-25-64
61	Matthew	McClincy	mmclincy@usg.com	USG		35 Arch Street Clouquet MN, 55720 United States	Electronic Service		No	AA-25-64
62	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	AA-25-64
63	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201 Saint Paul MN, 55104-1850 United States	Electronic Service		No	AA-25-64
64	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
65	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
66	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AA-25-64
67	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-64
68	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-64
69	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
70	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	AA-25-64
71	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	AA-25-64
72	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
73	Christopher J.	Oppitz		-		PO Box 910 Park Rapids MN, 56470-0910 United States	Paper Service		No	AA-25-64
74	Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	AA-25-64
75	Max	Peters	maxp@cohasset-mn.com	City of Cohasset		305 NW First Ave Cohasset MN, 55721 United States	Electronic Service		No	AA-25-64
76	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
77	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
78	Tolaver	Rapp	tolaver.rapp@cliffsnr.com	Cliffs Natural Resources		200 Public Square	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Suite 3400 Cleveland OH, 44114-2318 United States				
79	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	AA-25-64
80	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	AA-25-64
81	Ralph	Riberich	rriberich@uss.com	United States Steel Corp		600 Grant St Ste 2028 Pittsburgh PA, 15219 United States	Electronic Service		No	AA-25-64
82	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	AA-25-64
83	Santi	Romani		United Taconite		PO Box 180 Eveleth MN, 55734 United States	Paper Service		No	AA-25-64
84	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	AA-25-64
85	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	AA-25-64
86	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	AA-25-64
87	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	AA-25-64
88	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	AA-25-64
89	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	AA-25-64
90	Brett	Skyles	brett.skyles@co.itasca.mn.us	Itasca County		123 NE Fourth Street Grand Rapids MN, 55744-2600 United States	Electronic Service		No	AA-25-64

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
91	Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America		1405 Lawrence Road Cloquet MN, 55720 United States	Electronic Service		No	AA-25-64
92	James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered		150 S 5th St Ste 700 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
93	Robert	Tammen	bobtammen@frontiernet.net			PO Box 398 Soudan MN, 55782 United States	Electronic Service		No	AA-25-64
94	Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.		PO Box 475 County Highway 666 Hoyt Lakes MN, 55750 United States	Electronic Service		No	AA-25-64
95	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	AA-25-64
96	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-25-64
97	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-64
98	Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick		380 St. Peter St Ste 710 St. Paul MN, 55102 United States	Electronic Service		No	AA-25-64
99	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	AA-25-64
100	Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency		702 S. 3rd Avenue Virginia MN, 55792 United States	Electronic Service		No	AA-25-64