



June 2, 2026

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**VIA E-FILING**

Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re: In the Matter of the Petition for Approval of Modifications to Large Power Tariff  
Docket No. E-015/M-26-126**

Dear Ms. Bergman:

The Large Power Intervenors<sup>1</sup> (“LPI”) submit this letter in response to Minnesota Power’s letter dated May 19, 2026, in which it requests the withdrawal, without prejudice (“Withdrawal Letter”), of its very large customer class petition dated February 18, 2026 (“Petition”). LPI appreciates Minnesota Power’s acknowledgement in the Withdrawal Letter that there is broad opposition to its Petition and attempt to address that opposition. LPI would not oppose an unconditional withdrawal of the Petition in which Minnesota Power further acknowledged the need to establish a new and separate tariff under Minn. Stat. § 216B.1622 (“Very Large Customer Statute”) to serve new very large customers prior to any approvals of new electric service agreement (“ESA”) petitions to serve those customers.

Regrettably, LPI is forced to oppose the Withdrawal Letter because of the following two conditions it contains: (1) it is without prejudice; and (2) it will not delay other actions to approve pending ESA approvals. Under applicable rules, the Minnesota Public Utilities Commission (“Commission”) may only approve a withdrawal over a party’s objection if the Commission determines that the proposed withdrawal does not: (1) contravene the public interest; (2) prejudice any party; and (3) concern a filing that raises issues requiring Commission action.<sup>2</sup> Based on Minnesota Power’s representations in the Withdrawal Letter, LPI fails to see how the Commission could determine the withdrawal does not contravene the public interest or prejudice other parties.

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<sup>1</sup> LPI is an ad hoc consortium of Large Power and Large Light and Power customers of Minnesota Power consisting for purposes of this filing of Blandin Paper Company; Boise Paper, a Packaging Corporation of America company, formerly known as Boise, Inc.; Cleveland-Cliffs Minorca Mine Inc.; Enbridge Energy, Limited Partnership; Gerdau Ameristeel US Inc.; Hibbing Taconite Company; Sappi Cloquet, LLC; USG Interiors, Inc.; United States Steel Corporation (Keetac and Minntac Mines); and United Taconite, LLC.

<sup>2</sup> Minn. R. 7829.0430, subp. 2.

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To be sure, Minnesota Power reserves the right to seek approval of existing ESA petitions under its Large Power Tariff for new very large customers. For all of the reasons set forth in LPI's initial comment on the Petition,<sup>3</sup> the Very Large Customer Statute prohibits use of Minnesota Power's existing Large Power tariff for serving new very large customers and the Commission must instead approve a new separate tariff for new very large customers on Minnesota Power's system. Arguably more problematic, Minnesota Power could subsequently refile the Petition as initially filed (because it was withdrawn without prejudice), arguing the Petition should be granted in light of prior approvals of ESAs to new very large customers. In either case, Minnesota Power's approach appears to be an attempted end-run around the Very Large Customer Statute.

Violating the Very Large Customer Statute and potentially limiting parties' rights to oppose the re-filed Petition are actions contrary to the public interest that prejudice all parties opposing the Petition, including LPI. To cure the statutory violation and mitigate this prejudice, LPI respectfully requests that the Commission require an unconditional withdrawal of the Petition and, further, that the Commission direct Minnesota Power to submit an alternative, and separate, tariff for serving new very large customers consistent with the Very Large Customer Statute, as requested in LPI's Initial Comment. Until the Commission has acted on that new petition, LPI respectfully requests the Commission delay the processing of any ESA petition submitted by Minnesota Power to serve a new very large customer.

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

*/s/ Andrew P. Moratzka*

Andrew P. Moratzka

APM/cal

Enclosures

cc: Service List

153099718.4 0064591-00034

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<sup>3</sup> *In the Matter of the Petition of Minnesota Power for Approval of Modifications to its Large Power Tariff*, PUC Docket No. E015/M-26-126, LPI Initial Comment (May 8, 2026) (eDocket No. 20265-231610-02).

**CERTIFICATE OF SERVICE**

I, Carmel Laney, hereby certify that I have this day, served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

**LETTER COMMENT**

**SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS**

In the Matter of the Petition for Approval of  
Modifications to Large Power Tariff  
Docket No. E-015/M-26-126

Dated this 2<sup>nd</sup> day of June, 2026.

*/s/ Carmel Laney*  
\_\_\_\_\_

Carmel Laney

#	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	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	Official 26-126
9	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	Official 26-126
10	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
11	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
12	Erica	McConnell	emcconnell@elpc.org	Environmental Law & Policy Center		35 E. Wacker Drive, Suite 1600 Chicago IL, 60601 United States	Electronic Service		No	Official 26-126
13	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
14	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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
15	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
16	Haley	Van Loon	haley.vanloon@brownwinick.com	BrownWinick Law Firm			Electronic Service		No	Official 26-126
17	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		No	Official 26-126
18	Patrick	Woolsey	patrick.woolsey@sierraclub.org	Sierra Club		2101 Webster Street Suite 1300 Oakland CA, 94612 United States	Electronic Service		No	Official 26-126