

**STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Dan Lipschultz	Vice Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of the Application of Minnesota
Power for Authority to Increase Rates for
Electric Utility Service in Minnesota

DOCKET NO. E-015/GR-19-442

**COMMENTS OF THE OFFICE OF
THE ATTORNEY GENERAL**

The Office of the Attorney General—Residential Utilities and Antitrust Division (“OAG”) submits the following Comments on Minnesota Power’s (“the Company”) Application for Authority to Increase Rates for Electric Utility Service in Minnesota. In its Application, the Company requests a final rate increase of \$65.9 million and an interim rate increase of \$47.9 million. Because of Minnesota Power’s history of repeatedly and substantially overstating its revenue requirement in general rate cases, the Commission should reduce the Company’s interim-rate request to protect ratepayers from overpaying for service while this case is litigated. Further, the Commission should order that any refund owed to ratepayers at the conclusion of this case be returned with interest calculated at Minnesota Power’s overall cost of capital.

BACKGROUND

I. MINNESOTA POWER HAS A HISTORY OF SIGNIFICANTLY OVERESTIMATING ITS REVENUE REQUIREMENT.

For at least the last 25 years, Minnesota Power’s requested rate increases have consistently and substantially exceeded what the Commission has authorized the Company to charge through final rates. As shown below in Table 1, across the Company’s last four rate cases, the Commission has found only 47 percent of the initially requested increase to be just and

reasonable, on average. The most the Commission has ever allowed Minnesota Power to recover during this period, as a percentage of the initial request, was 66 percent, in the Company’s 2009 rate case:

**Table 1:
Comparison of Requested and Final Increases
in Minnesota Power’s Last Four Rate Cases**

Docket No.	Requested Increase (millions)	Final Increase (millions)	Final as % of Request
94-001	\$34.3	\$19.0	55%
08-415	\$45.0	\$20.4	45%
09-1151	\$80.9	\$53.5	66%
16-664	\$55.1	\$12.0 ¹	22%
		Average:	47%

Minnesota Power’s history of seeking inflated rate increases provides crucial context for the Company’s current request, suggesting that the request should be viewed with a healthy measure of skepticism.

II. MINNESOTA POWER’S PRACTICE OF INFLATING ITS REVENUE REQUIREMENT HAS HARMED RATEPAYERS.

As a direct result of its inflated rate-increase requests, Minnesota Power has consistently and substantially overcharged its ratepayers while the Company’s rate cases have been pending. As shown below in Table 2, Minnesota Power’s interim rates have been, on average, \$8.5 million higher than final rates, and the gap is increasing:

¹ Minnesota Power’s test year incorporated a roughly \$20 million reduction to depreciation expense as a rate-increase mitigation measure. Ultimately, the Commission ordered the Company to reverse that reduction and instead reduce its tax expense by a similar amount to reflect the impact of the federal Tax Cuts and Jobs Act of 2017. *See Minnesota Power’s 2016 Rate Case*, Docket No. E-015/GR-16-664, ORDER GRANTING RECONSIDERATION IN PART, REVISING MARCH 12, 2018 ORDER, AND OTHERWISE DENYING RECONSIDERATION PETITIONS (May 29, 2018). The net impact of these decisions on the final increase was less than \$1 million. *See Minnesota Power’s 2016 Rate Case*, REVISED INTERIM-RATE REFUND PLAN (Dec. 3, 2018).

**Table 2:
Comparison of Interim and Final Increases
in Minnesota Power’s Last Four Rate Cases**

Docket No.	Interim Increase (millions)	Final Increase (millions)	Difference (millions)
94-001	\$20.1	\$19.0	\$1.1
08-415	\$35.5	\$20.4	\$15.1
09-1151	\$48.5	\$53.5	-\$5.0
16-664	\$34.7 ²	\$12.0	\$22.7
		Average:	\$8.5

Collectively, these interim-rate overcollections amount to a \$34 million involuntary loan by ratepayers to the Company. And while Minnesota Power is required to refund overcollections after final rates are set, a refund will not necessarily make ratepayers whole. One reason for this is that the interest Minnesota Power pays on its “loan” is lower than the Company’s cost of capital. The interest rate for interim-rate refunds is typically the prime rate, which currently stands at 4.8 percent.³ The Company’s approved cost of capital is 7.0639 percent.⁴ Thus, the finance cost that Minnesota Power avoids by borrowing cash from ratepayers is substantially greater than what the Company pays ratepayers for that privilege. As discussed below, the Commission should take immediate action to limit the significant, ongoing interest-rate arbitrage by Minnesota Power at its ratepayers’ expense.

² The Commission later reduced the interim increase to \$32.2 million. *See Minnesota Power’s 2016 Rate Case, ORDER AUTHORIZING INTERIM-RATE REDUCTION* (Apr. 13, 2017).

³ *See* Minn. R. 7825.3300 (providing that interim-rate refunds will include interest at the prime rate); VALUE LINE INVESTMENT SURVEY 1423 (Nov. 8, 2019) (reporting current prime rate).

⁴ *See Minnesota Power’s 2016 Rate Case, FINDINGS OF FACT, CONCLUSIONS, AND ORDER* at 61 (Mar. 12, 2018).

ANALYSIS

I. MINNESOTA LAW EMPOWERS THE COMMISSION TO MODERATE INTERIM RATE INCREASES TO ADDRESS EXIGENT CIRCUMSTANCES.

Under Minnesota Statutes section 216B.16, subdivision 3 (“the interim-rate statute”), a utility filing a rate case may increase rates on an interim basis while the Commission considers its request. For purposes of interim rates, a utility’s revenue deficiency is normally calculated based on its proposed test-year rate base, expenses, and cost of capital.⁵ However, if the Commission finds that “exigent circumstances” exist, it may depart from the default method and set interim rates based on additional factors.⁶

Factors that have led the Commission to find exigent circumstances in recent rate cases include: the size of the requested increase;⁷ the likelihood that interim rates will exceed final rates;⁸ economic conditions in a utility’s service territory;⁹ the possibility that certain large customers might bypass a utility’s system;¹⁰ providing a transitional increase in rates;¹¹ and a utility’s rate-increase history, including the cumulative increase from its recent rate cases,¹² the

⁵ Minn. Stat. § 216B.16, subd. 3(b) (2018).

⁶ *Id.*

⁷ See *Minnesota Power’s 2009 Rate Case*, Docket No. E-015/GR-09-1151, ORDER SETTING INTERIM RATES at 3–4 (Dec. 30, 2009) (finding exigent circumstances based on size of request, recency of last increase, and economic conditions in utility’s service area).

⁸ See *Xcel’s 2010 Rate Case*, Docket No. E-002/GR-10-971, ORDER SETTING INTERIM RATES at 2 (requiring utility to use depreciation schedules consistent with its proposal for final rates because “[w]ithout this reduction, interim rates would exceed the amount requested for final rates”).

⁹ See *Minnesota Power’s 2009 Rate Case*, ORDER SETTING INTERIM RATES at 3–4.

¹⁰ See, e.g., *MERC’s 2017 Rate Case*, Docket No. G-011/GR-17-563, ORDER SETTING INTERIM RATES at 3–4 (Dec. 5, 2017); *CenterPoint’s 2017 Rate Case*, Docket No. G-008/GR-17-285, ORDER SETTING INTERIM RATES at 5 (Sept. 29, 2017); *Great Plains’ 2015 Rate Case*, Docket No. G-004/GR-15-879, ORDER SETTING INTERIM RATES at 4 (Nov. 30, 2015).

¹¹ See *Dakota Electric Association’s 2019 Rate Case*, Docket No. E-111/GR-19-478, ORDER SETTING INTERIM RATES at 3 (Nov. 7, 2019) (setting interim rates below statutorily allowed level to avoid collecting more interim revenue than utility needed and to provide “transitional increase” to final rates).

¹² See *CenterPoint’s 2017 Rate Case*, ORDER SETTING INTERIM RATES at 3 (finding exigent circumstances because ratepayers had seen \$100 million in rate increases over preceding decade and utility had consistently collected too much revenue during interim period).

amount of time since the last increase,¹³ and the utility's history of overstating its revenue requirement.¹⁴ Any one or more of these factors may be sufficient to justify a finding of exigent circumstances in a particular case.

In CenterPoint Energy Resources' ("CenterPoint") last rate case, for example, the Commission identified two factors that gave rise to exigent circumstances. First, CenterPoint's ratepayers had experienced more than \$100 million in rate increases over the preceding decade. Second, the utility's last six rate cases had resulted in final rates that were on average \$9.8 million less than interim rates. The Commission reasoned that "the Company has consistently collected significant excess revenues during interim-rate periods. While ratepayers are entitled to a refund of any over-collected amount, the magnitude and consistency of CenterPoint's over-collection during the interim revenue periods merit consideration in the exigent-circumstances analysis."¹⁵

II. MINNESOTA POWER'S HISTORY OF INFLATED RATE REQUESTS IS AN EXIGENT CIRCUMSTANCE THAT THE COMMISSION SHOULD TAKE INTO ACCOUNT WHEN SETTING INTERIM RATES IN THIS CASE.

Minnesota Power's practice of significantly overstating its revenue requirement, combined with a substantial cumulative rate increase over the past decade, constitute exigent circumstances that justify the Commission departing from the statutory formula. Over the past decade, Minnesota Power's ratepayers have seen a cumulative rate increase of \$85 million.¹⁶ And the Company's last four rate cases have resulted in final rates that were on average \$8.5 million less than interim rates, a cumulative overcharge of roughly \$34 million. Similar to

¹³ See *Minnesota Power's 2009 Rate Case*, ORDER SETTING INTERIM RATES at 3–4.

¹⁴ See *id.*; *CenterPoint's 2017 Rate Case*, ORDER SETTING INTERIM RATES at 3.

¹⁵ *CenterPoint's 2017 Rate Case*, ORDER SETTING INTERIM RATES at 3.

¹⁶ This figure is the sum of the final rate increases in the Company's last three rate cases: \$20.4 million (08-415); \$53.5 million (09-1151); and \$11.9 million (16-664).

CenterPoint's last rate case, the Commission should find that these facts give rise to exigent circumstances and take action to protect ratepayers.

Specifically, the Commission should limit Minnesota Power's interim rate increase to 67 percent of the Company's proposed final increase. A 67 percent cap is reasonable because it would align interim rates with the Company's highest historical final-rates achievement. As shown in Table 1, this achievement occurred in Minnesota Power's 2009 rate case, where the final increase represented 66 percent of the Company's requested increase. Capping Minnesota Power's interim increase at 67 percent of its requested final increase would reduce the interim increase from \$47.9 million to about \$44.2 million. This \$3.7 million downward adjustment would moderate the interim increase for ratepayers while still allowing the Company an opportunity to meet its purported increased cost of service.

The Commission used the same method to moderate the interim increase in Minnesota Power's 2009 rate case. Similar to now, Minnesota Power had a history of inflating its rate-increase requests—it had not achieved a final rate increase of more than 56 percent of its initial request in the previous 22 years. The Commission concluded that the most reasonable and equitable course of action was to reduce Minnesota Power's interim-rate request to 60 percent of its overall increase request, an amount “slightly in excess of any final revenue requirement found in previous Company rate cases in the last 22 years.”¹⁷ The Commission's decision was upheld on appeal.¹⁸

¹⁷ *Minnesota Power's 2009 Rate Case*, ORDER SETTING INTERIM RATES at 4.

¹⁸ See *In re App. of Minn. Power for Auth. to Increase Rates for Elec. Serv. in Minn.*, 838 N.W.2d 747, 750 (Minn. 2013).

III. THE COMMISSION SHOULD ORDER MINNESOTA POWER TO REFUND ANY INTERIM-RATE OVERCOLLECTION WITH INTEREST CALCULATED AT THE COMPANY'S OVERALL COST OF CAPITAL.

If history is any indication, Minnesota Power will end up collecting millions of dollars in excess interim revenues from ratepayers. The interim-rate statute requires utilities to refund interim overcollections with interest at a rate determined by the Commission,¹⁹ and the Commission's rules specify that the default interest rate for refunds is the prime rate. In this case, however, the Commission should vary its rules and require interest at Minnesota Power's overall rate of return to avoid imposing an excessive burden on ratepayers.

The Commission must grant a rule variance when three elements are present: (1) enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule; (2) granting the variance would not adversely affect the public interest; and (3) granting the variance would not conflict with standards imposed by law.²⁰ All three elements are present in this case.

Allowing Minnesota Power to pocket interim overcollections for a year or more, and then refund the money with interest calculated at the prime rate, would impose an excessive burden on ratepayers. It is simply not just and reasonable for the Company to borrow millions of dollars from ratepayers, thereby avoiding the substantial costs that it would accrue in raising capital from other sources, and to pay that "loan" back at an interest rate lower than the Company's avoided cost of capital. This is particularly true in light of Minnesota Power's history of overcollecting interim revenue, detailed above, and the fact that ratepayers have seen more than \$85 million in final rate increases over the last ten years.

¹⁹ Minn. Stat. § 216B.16, subd. 3(c).

²⁰ Minn. R. 7829.3200, subp. 1.

For similar reasons, granting a variance would not adversely affect the public interest; rather, doing so would further the public interest by giving Minnesota Power a greater incentive not to overstate its revenue requirement. The one-way nature of interim-rate refunds creates a natural incentive for utilities to overstate their revenue requirements, because if interim rates are lower than final rates, utilities do not have the right to surcharge to make up the difference during the interim period. As evidenced by Minnesota Power's established pattern of inflating its revenue requirement, a more powerful countervailing incentive is needed to protect ratepayers; a higher interest rate could provide that incentive.

Finally, granting a variance would not conflict with any standards imposed by law because the interim-rate statute does not specify a method for determining the interest rate for refunds. Rather, it leaves the Commission with discretion to choose the rate that it deems most equitable under the circumstances.

IV. THE COMMISSION SHOULD REFER THIS MATTER TO THE OFFICE OF ADMINISTRATIVE HEARINGS FOR A CONTESTED CASE PROCEEDING.

In its Notice, the Commission requests comments on whether this matter should be referred to the Office of Administrative Hearings for a contested case hearing. Minnesota Power's Application raises many significant factual issues that cannot be resolved without a contested case proceeding. As a result, the Commission should refer this matter to the Office of

Administrative Hearings for a contested case proceeding pursuant to Minnesota Statutes section 216B.16, subdivision 2.

Dated: November 12, 2019

Respectfully submitted,

KEITH ELLISON
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s/ Peter G. Scholtz

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November 12, 2019

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**Re: In the Matter of the Application of Minnesota Power for Authority to
Increase Rates for Electric Utility Service in Minnesota
MPUC Docket No. E-015/GR-19-442**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities and Antitrust Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

s/ **Peter G. Scholtz**

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Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota	309 W. Washington St. Ste. 800 Chicago, IL 60606	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	SPL_SL_19- 442_Potentially Interested Parties
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Robert B	Peacock		Fond Du Lac Development Corp	105 University Road Cloquet, MN 55702	Paper Service	No	SPL_SL_19- 442_Potentially Interested Parties
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
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 5510212131	Electronic Service	Yes	SPL_SL_19- 442_Potentially Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Santi	Romani	N/A	United Taconite	P O Box 180 Eveleth, MN 55734	Paper Service	No	SPL_SL_19- 442_Potentially Interested Parties
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Richard	Saveikoul	rsaveikoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Sara	Van Norman	sara@svn.legal	Van Norman Law, PLLC	1010 W Lake St Ste 100- 130 Minneapolis, MN 55408	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Daniel P.	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55102147	Electronic Service	Yes	SPL_SL_19- 442_Potentially Interested Parties
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

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@stael.com	Stael Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_19-442_GR-19-442
Peter	Beithon	pbeithon@otpco.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@stael.com	Stael 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@bklawfirm.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	ebrama@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@grenergy.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 Site 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@mnlisap.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
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John R.	Gasele	igasele@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@otpco.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	toftenn@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@mnutilityinvestors.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
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
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
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
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	elLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	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
Annie	Levenson Falk	anniealf@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 Duluth, 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 557422600	Electronic Service	No	OFF_SL_19-442_GR-19-442
Richard	Staffon	rostaffon@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
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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@xceleenergy.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@versocorp.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	kwali@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 55102147	Electronic Service	Yes	OFF_SL_19-442_GR-19-442

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