



AN ALLETE COMPANY

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September 29, 2017

VIA ELECTRONIC FILING

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of a Petition to Ensure Competitive Electric Rates for
Energy-Intensive Trade-Exposed Customers
Docket No. E015/M-16-564

Dear Mr. Wolf:

Enclosed please find Minnesota Power’s Rider for Energy-Intensive Trade-Exposed (EITE) Customers (“EITE Customers Rider”) with the effective date immediately suspended. Please see the attached updated tariff sheet. Minnesota Power previously had implemented the EITE Customers Rider effective February 1, 2017 based on the Minnesota Public Utilities Commission’s (“Commission”) December 21, 2016 Order and the Notice of Commission meeting on the March 9, 2017. However, due to the Commission’s verbal decision at its September 7, 2017 agenda hearing and for further reasons discussed below, Minnesota Power is suspending the EITE Customers Rider effective immediately. Minnesota Power does not make this decision lightly and recognizes the extensive work and effort by the Commission and the parties in working to implement the energy policy of the state of Minnesota as set forth in Minn. Stat. § 216B.1696 (“EITE Statute”).

The primary reason the Company is suspending the EITE Customers Rider is the Commission’s decision on September 7, 2017 and potential outcomes in Minnesota Power’s pending general rate case (Docket No. E015/GR-16-664) that could negate the revenue neutrality condition established under the EITE Statute. While the December 21, 2016 Order granted Minnesota Power the authority to establish a tracker account, the subsequent Commission decisions, Minnesota Power’s interim rate reductions, and motions by the parties and potential decisions in the general rate case lead to the Company questioning how revenue neutrality can be assured at this time. A suspension of the EITE Customers Rider also provides parties the opportunity to request clarification or reconsideration of the Commission’s forthcoming order stemming from the September 7, 2017 agenda hearing. Notwithstanding this suspension, Minnesota Power has continued its low-income customer outreach and will move forward with its expanded efforts to identify and reach these customers to connect them with available resources and applicable discounts. This will be particularly important prior to implementing complex cost recovery and refund mechanisms such as those that would exist under

EITE, as approved. Minnesota Power shares the Commission's concerns that customer notices and exemptions must be clear and thorough.

As part of its required February 1, 2018 annual update on EITE, Minnesota Power will inform the Commission and parties whether the Company will take the EITE Customers Rider out of suspension and associated customer effects or if further analysis needs to be conducted. Minnesota Power appreciates the ongoing efforts considering the EITE Statute and looks forward to continue working with the Commission to find avenues to implement the energy policy of the state of Minnesota.

Please contact me at 218-355-3919 with any questions related to this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Herbert G. Minke, III". The signature is written in a cursive style with a prominent "H" and "M".

Herbert G. Minke, III
Vice President – Minnesota Power Regulatory Affairs

Attach.
cc: Official Service List

RIDER FOR ENERGY-INTENSIVE TRADE-EXPOSED (EITE) CUSTOMERS

APPLICATION

Designed to ensure competitive electric rates for Energy-Intensive Trade-Exposed (EITE) customers, this EITE Customers Rider is applicable to any eligible Large Power Service Customer (Rate Code 54/74) or Large Light and Power Service Customer (Rate Code 55/75) who meets the definition of an EITE customer as specified in Minnesota Statutes, Section 216B.1696 (EITE Statute).

In order to take service under this Rider, customer must have a Minnesota Public Utilities Commission (Commission) approved Electric Service Agreement (ESA) with a remaining term of not less than four years at the time service under the Rider commences.

Customer taking service under this Rider shall have total power requirement of at least 2,000 kW as set forth in its ESA.

Initial applicability of the EITE Customers Rider is limited to the following customers who have signed EITE Customer Commitment Letter Agreements: ArcelorMittal – Minorca Mine, Blandin Paper Company, Boise Paper, Hibbing Taconite Company, Magnetation LLC, Mesabi Nugget Delaware LLC, Mining Resources LLC, Sappi Cloquet LLC, United States Steel Corporation, United Taconite LLC/Northshore Mining Company, and Verso Corporation.

RATE MODIFICATION

All provisions of the applicable ESA and applicable service schedules shall apply except as modified below.

Energy Charge Credit (ECC): There shall be an ECC of 1.15¢ per kWh for all Firm Energy, Excess Energy, and Incremental Production Service (IPS) Energy in excess of a monthly energy usage threshold determined to be 450 hours times the customer's expected peak electric usage, as specified in customer's EITE Customer Commitment Letter Agreement (Letter Agreement). The ECC shall be applicable for a term of four years beginning on the effective date of the EITE Customers Rider.

Below are two sample calculations for example purposes only of how the EITE Customer ECC would be applied to generic Large Power and Large Light and Power customers under full and partial production scenarios.

LARGE POWER

Example 1 (full production):

Customer's expected peak energy usage = 100 MW (set in Letter Agreement)

Filing Date	<u> June 30, 2016 </u>	MPUC Docket No.	<u> E015/M-16-564 </u>
Effective Date	<u> Suspended - September 29, 2017 </u>	Order Date	<u> December 21, 2016 </u>

Approved by: Marcia A. Podratz
Marcia A. Podratz
Director - Rates

RIDER FOR ENERGY-INTENSIVE TRADE-EXPOSED (EITE) CUSTOMERS

Total Energy (including Firm, Excess Energy, IPS Energy) = 62,220 MWh
Energy Charge Credit threshold = (100 MW x 450 hours) = 45,000 MWh

Energy over the 45,000 MWh will receive the ECC.
Credit Calculation = (62,220 MWh – 45,000 MWh) x \$11.50/MWh = \$198,030

Example 2 (partial production):

Customer's expected peak energy usage = 100 MW (set in Letter Agreement)
Total Energy (including Firm, Excess Energy, IPS Energy) = 51,240 MWh
Energy Charge Credit threshold = (100 MW x 450 hours) = 45,000 MWh

Energy over the 45,000 MWh will receive the ECC.
Credit Calculation = (51,240 MWh – 45,000 MWh) x \$11.50/MWh = \$71,760

LARGE LIGHT AND POWER

Example 1 (full production):

Customer's expected peak energy usage = 10 MW (set in Letter Agreement)
Total Energy (including Firm, Excess Energy, IPS Energy) = 4,758 MWh
Energy Charge Credit threshold = (10 MW x 450 hours) = 4,500 MWh

Energy over the 4,500 MWh will receive the ECC.
Credit Calculation = (4,758 MWh – 4,500 MWh) x \$11.50/MWh = \$2,967

Example 2 (partial production):

Customer's expected peak energy usage = 10 MW
Total Energy (including Firm, Excess Energy, IPS Energy) = 4,026 MWh
Energy Charge Credit threshold = (10 MW x 450 hours) = 4,500 MWh

Energy over the 4,500 MWh will receive the ECC.
Credit Calculation = (4,026 MWh – 4,500 MWh) x \$11.50/MWh = \$0 (because ECC can't be negative)

SERVICE CONDITIONS

1. After a determination of meeting the eligibility requirements as set forth under the EITE Statute and this Rider, customer shall sign an EITE Customer Commitment Letter Agreement. The EITE Customer Commitment Letter Agreement shall include the customer's anticipated peak electric usage and other necessary information to calculate the ECC or other components of this Rider.

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Director - Rates

RIDER FOR ENERGY-INTENSIVE TRADE-EXPOSED (EITE) CUSTOMERS

2. Customer shall begin to receive EITE Customers Rider benefits no sooner than the first day of the month following Commission approval of this Rider and the Rider for Energy-Intensive Trade-Exposed Current Cost Recovery.
3. If Customer issues a cancellation notice related to the term of the ESA, then within the final two years of its ESA term, any benefits or rate credits under the EITE Customers Rider shall be placed into a tracker, receipt of which benefits or rate credits is contingent upon negotiation of a new ESA prior to expiration of the ESA term, which ESA is ultimately approved by the Commission. If Customer and Company do not execute a new ESA prior to the expiration of the existing ESA's term, Customer shall forfeit all benefits and rate credits in the tracker and such rate credits shall be credited under and pursuant to the EITE Current Cost Recovery Rider. During this two-year period, Customer shall continue to take service from Company under its Commission-approved ESA and applicable service schedules.
4. Customers who have taken service under this Rider shall not be subject to the Rider for Energy-Intensive Trade-Exposed Current Cost Recovery and do not need to submit an application for exemption.

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Approved by: Marcia A. Podratz
Marcia A. Podratz
Director - Rates

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **29th** day of **September, 2017**, she served Minnesota Power's Tariff Suspension Request in **Docket No. E015/M-16-564** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on the attached Official Service List were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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