



May 30, 2025

VIA E-FILING

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

Re: In the Matter of an Investigation into
Self-Commitment and Self-Scheduling of
Large Baseload Generation Facilities
Docket No. E999/CI-19-704
REPLY COMMENTS

Dear Mr. Seuffert:

Minnesota Power submits to the Minnesota Public Utilities Commission its Reply Comments in response to the Minnesota Department of Commerce – Division of Energy Resources who filed Comments filed on May 1, 2025, in the above-referenced Docket.

Please contact me at (218) 355-3182 or dmencel@mnpower.com with any questions related to this matter.

Yours truly,



Debbie A. Mencil
Regulatory Compliance

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Attach.

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

In the Matter of an Investigation into
Self-Commitment and Self-Scheduling of
Large Baseload Generation Facilities

Docket No. E999/CI-19-704

**MINNESOTA POWER'S
REPLY COMMENTS**

I. INTRODUCTION

Minnesota Power (“Company”) submits these Reply Comments in response to the Minnesota Department of Commerce – Division of Energy Resources (“Department”) who filed Comments on May 1, 2025, in the above-referenced Docket.

II. RESPONSE TO COMMENTS

The Company acknowledges and appreciates the Department’s recommendation to the Minnesota Public Utilities Commission (“Commission”) to accept our 2024 Self-Commitment compliance report. We also value the Department’s detailed review and constructive feedback on our reporting practices.

As noted by the Department, the “Plant startup condition data (cold, warm, or hot)”, as required by the Commission’s December 1, 2021 Order, was not included in our compliance filing. This information was inadvertently omitted. The company has this data and would be happy to update the record to include this information and is committed to ensuring that this information is included in all future filings to maintain compliance and ensure transparency.

Additionally, we support the Department’s recommendation to discontinue the best-case/worst-case reporting requirement, as it has proven to be of limited value.

Minnesota Power remains committed to working collaboratively with the Commission and the Department to ensure that our operations align with regulatory requirements and continue to provide value to our customers.

III. CONCLUSION

Minnesota Power appreciates the opportunity to provide these Reply Comments and looks forward to the Commission's consideration of this matter.

Dated: May 30th, 2025

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Mencil". The signature is written in a cursive, flowing style.

Debbie A. Mencil
Regulatory Compliance Specialist
Minnesota Power
30 W. Superior Street
Duluth, MN 55802
(218) 355-3182
dmencil@mnpower.com

STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 30th day of May, 2025, I electronically filed a true and correct copy of Minnesota Power's Reply Comments in **Docket No. E999/CI-19-704** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Tiana Heger