

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

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph Sullivan	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

In the Matter of the Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case

DOCKET NO. E-015/M-20-429

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

The Office of the Attorney General—Residential Utilities Division (“OAG”) submits these reply comments in response to the May 11, 2020 comments of the Large Power Intervenors (“LPI”), an *ad hoc* consortium of large industrial customers of Minnesota Power (“Company”). LPI asks the Commission to grant a “procedural” extension of the Company’s Rider for Energy-Intensive Trade-Exposed Customers (“EITE rider”), which provides a rate discount to certain Large Power customers (“EITE customers”) paid for by non-EITE customers. The rider was originally set to expire in February 2021, but the Commission recently decided that it should terminate at the end of the Company’s pending rate case.<sup>1</sup>

Circumstances have changed significantly in the few short weeks since the Commission issued its EITE-extension order. In particular, due to the COVID-19 pandemic, the Company

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<sup>1</sup> See generally Docket No. E-015/M-16-564, Order Approving Rider Extension with Conditions (Mar. 17, 2020) (hereinafter “EITE-Extension Order”).

has proposed to resolve its 2019 rate case on an expedited basis.<sup>2</sup> As part of that resolution, the Company proposes to restore the EITE rider's original expiration date and allow parties to address the rider's future in another forum. LPI, however, is not happy with this return to the pre-rate-case status quo and seeks a further extension of the EITE rider until the end of the Company's next-filed rate case. LPI states that its members face "dire" economic challenges as a result of the pandemic, which has caused some of them to temporarily idle their operations, and suggests that the rider "could make a difference in the economic analysis that will precede restarting idled facilities."<sup>3</sup>

The OAG is sympathetic to the social and economic impacts, as well as potential rate increases, that *all* of Minnesota Power's customers, including LPI, residential ratepayers, and small-business ratepayers, are now facing. However, now is not the time for hasty decisions about the future of the EITE rider. As discussed in these reply comments, restoring the rider's February 1, 2021 expiration date would not harm LPI and would permit parties and the Commission to give LPI's request the attention it deserves in a separate proceeding. If, however, the Commission decides to determine the rider's future in this proceeding, the OAG would recommend that the rider be terminated at the conclusion of the proceeding, consistent with the March 17, 2020 EITE-extension order.

#### **I. EXTENDING THE EITE RIDER WOULD HARM NON-EITE CUSTOMERS.**

LPI argues that extending the EITE rider would not harm non-EITE customers and claims to be surprised that other parties have not "championed" an extension. The OAG is happy to explain its opposition. Interclass revenue apportionment is a zero-sum game: a subsidy

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<sup>2</sup> See generally Docket No. E-015/M-20-429, Emergency Petition for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case (Apr. 23, 2020) (hereinafter "Petition").

<sup>3</sup> LPI Initial Comments at 12 (May 11, 2020).

provided to one class of customers must be recovered from other classes for the utility to remain revenue-neutral. The EITE discount is currently being funded by the withholding of \$15.5 million in Large Power revenues from base rates.<sup>4</sup> These revenues were directly attributable to the EITE discount and therefore must be used to offset the cost of the discount.<sup>5</sup>

Non-EITE customers have been bearing the cost of this \$15.5 million EITE subsidy since 2017 without the corresponding rate discount that EITE customers enjoy. Extending the rider in the current docket would deny non-EITE customers the opportunity to argue for termination of this subsidy with the benefit of a fully developed record, and would prolong the period during which their rates are inflated. Moreover, for as long as the EITE rider is in effect, certain “EITE-paying” customers remain at risk of receiving additional surcharges to recover any shortfall that remains after the revenues attributable to the EITE discount are netted against its cost.<sup>6</sup>

LPI claims that an extension would not result in surcharges, but its claim should reassure no one. The OAG is unaware of a commitment by Minnesota Power that it will never seek to surcharge EITE-paying customers. Indeed, the OAG gave the Company a chance to make such a commitment but the Company declined, only stating that it does not “expect” to do so given current conditions.<sup>7</sup> And although the Commission’s current EITE-extension order prohibits the

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<sup>4</sup> See Docket No. E-015/GR-16-664, Findings of Fact, Conclusions, and Order at 52 (Mar. 12, 2018) (explaining that test-year revenue requirement must be increased to because “revenue from Keetac must be accounted for as an increase in utility revenue in a tracker established under Minn. Stat. § 216B.1696 . . . to offset the costs of the discounted EITE rate”); MP Response to OAG IR No. 6005 (OAG Reply Attach. A) (explaining that 16-664 final revenue requirement reflected removal of \$15.5 million of Keetac-restart revenue attributable to EITE rider).

<sup>5</sup> See Minn. Stat. § 216B.1696, subd. 2(d) (providing that “the commission shall allow the utility to recover any costs, including reduced revenues, or refund any savings, including increased revenues, associated with providing service to a customer under an EITE rate schedule”); Docket No. E-015/M-16-564, Order Authorizing Cost Recovery with Conditions at 7 (Apr. 20, 2017) (agreeing with the OAG that crediting EITE-paying customers with increased revenues from customers receiving EITE subsidy comports with statute).

<sup>6</sup> The “EITE-paying” customers who may become subject to surcharges include all non-EITE customers other than low-income customers. See Minn. Stat. § 216B.1696, subd. 2(d) (providing that EITE costs and savings must not be recovered from or refunded to EITE customers or low-income customers).

<sup>7</sup> MP Response to OAG IR No. 6005 at 1 (OAG Reply Attach. A).

Company from surcharging non-EITE customers after February 1, 2020,<sup>8</sup> the current order, and its prohibition on surcharges, would presumably be superseded by any future order extending the rider.

## **II. RESTORING THE RIDER'S ORIGINAL EXPIRATION DATE WILL NOT HARM LPI AND WOULD PERMIT THE EITE RIDER'S FUTURE TO BE DECIDED IN A MORE APPROPRIATE FORUM.**

LPI's claim that it would be harmed if the Commission restores the rider's original expiration date appears to arise from its belief that the pending rate case would have resulted in final rates that reflect its preferred rate design.<sup>9</sup> The gaping hole in this logic, of course, is that this result was never a certainty, and LPI loses nothing by having the pre-rate-case status quo restored. LPI also complains that the Company's proposed resolution of the rate case would result in a rate increase without the opportunity for LPI to address the alleged uncompetitiveness of Large Power rates.<sup>10</sup> But other stakeholders are equally disadvantaged—unable to file testimony due to the suspension of the rate case and, moreover, unable to evaluate LPI's claims that its members' rates are uncompetitive. And, again, the proposed resolution would give LPI the same opportunity that it had to seek extension of the EITE rider prior to the filing of the rate case: introducing a miscellaneous petition that satisfies the requisite evidentiary standard.

Furthermore, Minnesota Power's proposal would cause LPI's members no near-term rate increase and, as LPI acknowledges, would not prejudice its right to seek to have the rider extended or modified in another docket.<sup>11</sup> This gives LPI eight months, if it does not sit on its hands, to pursue an extension of the rider. And by the end of the year, LPI will likely be in a

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<sup>8</sup> EITE-Extension Order at 4.

<sup>9</sup> See Docket No. E-015/GR-19-442, Direct Testimony of Marcia Podratz at 103 (Nov. 1, 2019) (stating that “[i]nstead of offering a separate discount, Minnesota Power aims to design its Large Power base rates to be reasonably close to the Large Power class cost of service”).

<sup>10</sup> See LPI Initial Comments at 11.

<sup>11</sup> See *id.* at 4 (quoting Minnesota Power's statement that the “Petition is not intended to change any party's opportunity to propose in other dockets to extend or modify the EITE rate beyond February 1, 2021”).

better position to understand COVID-19's long-term impacts on its members' operations.<sup>12</sup> Unfortunately, however, LPI has opted to use the current crisis to try to push through another EITE-rider extension that would enrich its members at the expense of other ratepayers, many of whom are already having trouble affording their lives.

The OAG had supported restoring the EITE rider's original expiration date—conditioned on the equitable sharing of the discount's base-rate impact—out of a desire to maintain the rate-design status quo, avoid interclass disputes, and facilitate the potential resolution of this case. Now that LPI has rather unproductively introduced a contentious new issue into this proceeding, the OAG submits that one potential resolution of this issue would be to terminate the rider immediately, remove the discount's impact from present revenues before calculating the increase, and thereby end the rate subsidy EITE customers currently enjoy. This resolution would be consistent with the Commission's order extending the rider, in spirit if not in letter, because it would end the rider coincident with the next increase to base rates. It would also be administratively cleaner than extending the rider to February 2021 or to the end of some as-yet-unknown rate case.

### **III. THE COMMISSION SHOULD NOT EXTEND THE EITE RIDER WITHOUT PROOF THAT IT WILL DELIVER A NET BENEFIT TO MINNESOTA POWER OR TO THE STATE.**

LPI cites the EITE statute's statement of purpose—to “ensure competitive rates” for EITE customers—as if the statement supplied an independent basis for giving its members a rate break.<sup>13</sup> LPI has apparently forgotten about the main ratepayer-protection provision in the statute: the requirement that any EITE rate schedule be supported by evidence of a net benefit to

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<sup>12</sup> *See id.* at 8–9 (explaining that Blandin Paper Company will shut down only temporarily; Hibbing Taconite Company is expected to reopen on July 6, 2020; Sappi Cloquet, LLC is operating on a rotational basis; and Verso Corporation continues to operate).

<sup>13</sup> *See id.* at 12.

the utility or to the state.<sup>14</sup> Notably, Minnesota Power and LPI were barely able to establish a net benefit for the existing EITE rider, failing in their first attempt,<sup>15</sup> and ultimately persuading just three Commissioners that the rider would yield a net benefit to Minnesota Power—but not to the state of Minnesota.<sup>16</sup>

The Commission should reject LPI’s demand, in the midst of a financial crisis, to extend the EITE rider on the strength of years-old evidence of a net benefit and LPI’s assertion that current Large Power rates are “uncompetitive.” There are two main reasons for this. First, a fixed term was essential to the Commission’s original approval of the rider, and the unique procedural posture that prompted the Commission’s EITE-extension order no longer exists. Second, the evidence that supported the Commission’s net-benefit finding when it originally approved the rider is now stale, and cannot support such a finding under the current economic conditions. If the Commission entertains LPI’s extension request, it should use the opportunity to fully evaluate whether the rider continues to provide a net benefit.

**A. DESPITE LPI’S CHARACTERIZATION OF ITS REQUEST AS “PROCEDURAL,” THE EITE RIDER’S FOUR-YEAR TERM WAS ESSENTIAL TO MINNESOTA POWER’S PROPOSAL FOR, AND THE COMMISSION’S APPROVAL OF, THE RIDER.**

After its first petition for an EITE rider was rejected, Minnesota Power filed a new petition supported by additional evidence and proposing new conditions designed to protect ratepayers. One of the conditions offered as an inducement for approval of the EITE rider was

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<sup>14</sup> See Minn. Stat. § 216B.1696, subd. 2(b) (requiring net-benefit showing).

<sup>15</sup> See Docket No. E-015/M-16-564, Order Approving EITE Rate, Establishing Cost Recovery Proceeding, and Requiring Additional Filings at 1, 8 (Dec. 21, 2016) (hereinafter “EITE-Approval Order”) (recounting that Minnesota Power’s first EITE petition was denied because it failed to demonstrate a net benefit to the Company or the state of Minnesota).

<sup>16</sup> See Docket No. E-015/M-16-564, 9/15/16 PUC Agenda Meeting Minutes at 3 (Mar. 9, 2017) (adopting motion to “[f]ind that MP’s Proposed EITE Rate Schedule and EITE Rate, as filed by MP, can be expected to yield a net benefit to the utility”).

that the rider would expire after four years. The Company explained its term-limit choice as follows:

The [rider] as proposed will have a four-year initial term. A review of the business cycles in the taconite industry has indicated that a four-year cycle, from good times to bad and then back to better times, is appropriate, as demonstrated by the 1982-1985, 1986-1989 and the 2000-2003 corrections. A four-year term also seems reasonable to allow for a robust assessment of the impacts and the effects of the [rider and its costs] on the net benefit to the utility and the state. While Minnesota Power believes that global competition will continue to affect and to impact the operations, sustainability and success of its largest customers, the Company also recognizes and acknowledges that such a review could result in several potential alternatives that would then be presented to the Commission for review and consideration; possibly including recommendations like the elimination of the [rider] as no longer appropriate or necessary, changes in the conditions relating to the application of the [rider], replacement of the [rider] with another mechanism, revisions of the Cost Recovery mechanism or allocation, continuation of the [rider] and associated Cost Recovery mechanism “as-is”, or some other rate making mechanism commonly and customarily reviewed, vetted and approved by the Commission.<sup>17</sup>

The Commission, by approving the petition, adopted this four-year term and, at least implicitly, agreed that a four-year reevaluation period was reasonable and in the public interest.<sup>18</sup>

LPI argues that the Commission has already approved a procedural extension of the EITE rider once and can do so again. It goes without saying that the Commission can reconsider prior decisions at any time. But LPI’s argument ignores two inconvenient truths. First, the unique procedural posture that led the Commission to extend the rider previously no longer exists: When Minnesota Power requested the extension, in October of last year, the date of Minnesota

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<sup>17</sup> See Docket No. E-015/M-16-564, Revised Petition at 13 (June 30, 2016).

<sup>18</sup> See EITE-Approval Order at 9 (finding that Company’s revised proposal, including four-year EITE rider, could be expected to yield a net benefit to the utility); see also EITE-Extension Order at 4 (acknowledging that “a fixed term length was a factor in Commission approval of the rider” though the precise length of the term was perhaps not essential).

Power’s rate-case filing—November 1—was known and imminent. Further, as the Commission noted, final rates were expected to take effect only a few months after the EITE rider’s original February 2021 expiration date.<sup>19</sup> Today, however, no rate-case filing is imminent—indeed, if the petition is granted, a rate case will not be filed before March of next year, *after* the original expiration date—and extending the rider through the end of that case would mean a mid-2022 expiration, at the earliest.<sup>20</sup> In other words, the Commission must decide how far it is willing to allow its prior orders—both the original approval order and the extension order—to be stretched.

The second inconvenient fact that LPI ignores is that the Commission’s EITE-extension order contemplates that the rider will terminate upon the resolution of the pending rate case. While the precise language that the Commission used was “until final rates,” the apparent intent was that the rate case’s resolution would determine the future treatment of the EITE subsidy. The Company’s too-clever-by-half proposal to effectuate a base-rate increase without triggering “final rates” by withdrawing its rate case is a transparent attempt to prevent straightforward application of the Commission’s order. Fortunately, it does nothing to diminish the Commission’s power to end the EITE rider in resolving Minnesota Power’s petition.

**B. THE EVIDENCE ON WHICH THE COMMISSION’S PREVIOUS “NET BENEFIT” FINDING WAS FOUNDED IS STALE AND CANNOT SUPPORT AN EXTENSION UNDER THE CURRENT ECONOMIC CIRCUMSTANCES.**

The EITE statute requires proof that an EITE rate will provide a “net benefit to the utility or the state.”<sup>21</sup> The net-benefit requirement was provided as a substitute for the usual regulatory protections of sections 216B.03, .05, .06, .07, and .16, which the EITE statute expressly

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<sup>19</sup> EITE-Extension Order at 4.

<sup>20</sup> The OAG emphasizes that, while Minnesota Power could file another rate case as early as March 2021, the Company has stated that it does not intend to file before November 2021. *See* Petition at 17.

<sup>21</sup> Minn. Stat. § 216B.1696, subd. 2(b).



discards.<sup>22</sup> The net-benefit requirement is thus the only safeguard that the statute offers to protect non-EITE customers from unjustified cost shifting.

In conjunction with Minnesota Power's revised petition for an EITE rider, the Company and LPI provided a data dump of evidence to support their claims that the rider would result in a net benefit to the utility or the state. This evidence consisted of, among other things, sworn affidavits by Minnesota Power executives, LPI members, and industry associations; voluminous economic reports; expert testimony; news articles; resolutions of support; and detailed rate-impact calculations. Minnesota Power's petition alone spanned 250 pages, and the combined length of LPI's and other industrial stakeholders' submittals were more than twice that. Despite this mountain of evidence, the Commission found a net benefit based solely on the positive revenue impact for Minnesota Power, declining to find any net benefit to the state of Minnesota.

In this case, the only evidence of a potential net benefit is LPI's heavily qualified, unsworn assertion that extending the EITE rider "could make a difference in the economic analysis that will precede restarting idled facilities."<sup>23</sup> This proffer falls far short of the evidentiary showing that the Commission required before approving the existing rider, and the Commission should protect non-EITE ratepayers by demanding a similar showing here, especially now that LPI is seeking an extension *beyond* the end of the current rate case. Simply put, to grant a practically indefinite extension without the thoughtful reevaluation that Minnesota Power's original proposal envisioned would render the rider's four-year term a nullity.

Even if the Commission believes that a new net-benefit showing is not required to extend the EITE rider, the Commission should decline to extend it because the original justification for

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<sup>22</sup> *Id.* See also EITE-Approval Order at 4 (observing that, rather than allowing the Commission to determine whether an EITE rate is just and reasonable, the statute "directs the Commission only to consider the interests of the utility, or the state, and to determine if a proposed EITE rate schedule would be a net benefit to one of them").

<sup>23</sup> LPI Initial Comments at 12.

the rider has vanished. According to Minnesota Power’s revised EITE petition, the utility-specific benefit the Company would receive from the rider was an increase in net revenue from electricity sales to large industrial customers.<sup>24</sup> This analysis was premised on the existence of a causal link between the discount and the viability of EITE customers.<sup>25</sup> Initial indications were that the rider had succeeded in spurring new industrial sales, with U.S. Steel’s Keewatin Taconite (“Keetac”) mine coming online shortly after the Commission approved the rider.<sup>26</sup>

The current pandemic, however, has thrown into doubt the entire premise for the rider. Nearly 300 MW of EITE load is currently idled, including Keetac, despite the continued availability of the discount.<sup>27</sup> If these customers, who have been receiving a subsidy under the rider, are nonetheless unable to keep operating, it is not clear that the rider can deliver the net benefit that it was supposed to. These dramatic changes wrought by the pandemic underscore the wisdom of exactly the type of periodic review that was supposed to be facilitated by the rider’s four-year term.<sup>28</sup> With the rider’s efficacy in doubt, the Commission should not grant an extension without assuring other ratepayers that the EITE discount will yield a net benefit to Minnesota Power or the state, now and in the future.

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<sup>24</sup> See EITE-Approval Order at 6 (“According to the Company, the proposal would provide a net benefit to the utility in large part by increasing revenue from electricity sales to large industrial customers. The Company expects that the rate reduction would cause an increase in EITE customers’ electric consumption”).

<sup>25</sup> See EITE-Approval Order at 7 (noting Minnesota Power’s argument that lowering costs for large industrial customers would promote their economic viability).

<sup>26</sup> See Docket No. E-015/M-16-564, U.S. Steel Letter filed by MP (Mar. 10, 2017) (noting that Commission’s approval of EITE rider was a “crucial ingredient[]” in Keetac’s restart).

<sup>27</sup> See MP Public Response to OAG IR No 6010 at 2 (OAG Init. Attach. A); LPI Initial Comments at 8–9.

<sup>28</sup> See Docket No. E-015/M-16-564, Revised Petition at 13 (June 30, 2016) (stating that a four-year term would “allow for a robust assessment of the impacts and the effects of the [rider and its costs] on the net benefit to the utility and the state”).

## CONCLUSION

The challenges of COVID-19 have highlighted a simple truth—the fates of Minnesota Power’s residential, small-business, and large industrial customers are inextricably linked. The OAG is confident that Minnesotans will successfully weather this storm together. LPI’s EITE-extension request raises important socioeconomic questions that should be treated with the seriousness they deserve—not rushed through as part of an expedited resolution to the rate case. If, however, the Commission determines the rider’s future in this case, the OAG would respectfully recommend that it be terminated early.

If the Commission grants Minnesota Power’s petition without terminating the EITE rider, the OAG would maintain its recommendation from initial comments that the Commission require the Company to reallocate the EITE discount’s impact among all classes according to the existing base-rate revenue apportionment before applying the proposed 5.75 increase to base rates. Doing so would maintain the rate-design status quo, and is the minimum level of protection needed for non-EITE ratepayers. Finally, if the Commission terminates the rider, it

should remove the EITE discount's impact from base rates entirely, resulting in a 5.59 percent across-the-board increase to base rates.<sup>29</sup>

Dated: May 18, 2020

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ **Peter G. Scholtz**

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ATTORNEYS FOR OFFICE OF  
THE ATTORNEY GENERAL—  
RESIDENTIAL UTILITIES DIVISION

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<sup>29</sup> See Minnesota Power Response to OAG IR No. 6002 at 1–2 (OAG Init. Attach. C) (showing rate increase of 5.59 percent without the EITE discount).

OAG No. 6005

**State Of Minnesota  
Office of the Attorney General  
Utility Information Request**

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

*Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case* **MPUC Docket No.** E-015/M-20-429

**Requested from:** Minnesota Power

**Requested By:** Peter Scholtz  
**Telephone:** (651) 757-1473

**Date of Request:** April 28, 2020  
**Due Date:** May 8, 2020

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Confirm that non-EITE customers will not be billed any EITE-related surcharges during the remaining term of the EITE rider under any circumstances.

**RESPONSE:**

To date, non-EITE customers have not been billed any EITE-related surcharges, and during the remaining term of the EITE rider Minnesota Power does not expect any change to that position.

As detailed in Minnesota Power's February 3, 2020 EITE annual compliance filing,<sup>1</sup> in order to keep Minnesota Power revenue neutral, cost recovery can be thought of as consisting of two components: a) Cost recovery through higher base rates (by not considering the majority of Keetac revenues when making a final determination in Minnesota Power's recent 2016 rate case), and b) Cost recovery through a line item on Minnesota Power customer bills. These two components are explained in detail below.

*a) Cost Recovery Through Higher Base Rates*

Minnesota Power's final rate increase<sup>2</sup> in its 2016 rate case was determined to be \$12 million dollars, including \$15.5 million associated with keeping the Keetac restart revenue in the EITE docket. As a result, with the implementation of final rates that occurred on December 1, 2018, Minnesota Power will be revenue neutral with respect to providing the EITE discount.

<sup>1</sup> *In the Matter of a Petition to Ensure Competitive Electric Rates for Energy- Intensive Trade-Exposed Customers*, Docket No. E015/M-16-564, MINNESOTA POWER'S ANNUAL COMPLIANCE FILING at pp. 7 and 8 (Feb. 3, 2020).

<sup>2</sup> Minnesota Power's 2016 retail rate case, Docket No. E015/GR-16-664.

*b) Cost Recovery Through a Line Item on Customer Bills*

EITE cost recovery through a line item on customer bills was not implemented in 2018 because Minnesota Power expected that the refund calculation ordered by the Commission on October 13, 2017, would lead to the collection of the EITE tracker from EITE-paying customers, followed by a 100 percent refund to EITE-paying customers the following year.

In 2019, revenue from EITE customers was significantly higher than in the baseline year 2016. Furthermore, Minnesota Power expects similar results in future years. As a result, Minnesota Power does not expect to place a bill line for EITE cost recovery on customer bills during the term of the EITE rate.



The Office of  
**Minnesota Attorney General Keith Ellison**  
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May 18, 2020

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**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**

***In the Matter of the Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case***  
**MPUC Docket No. E-015/M-20-429**

Dear Mr. Seuffert:

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

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

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

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Enclosure





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Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 56538	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Barbara	Gervais	tofterm@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_Official CC Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Annete	Henkel	mu@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave.  Marathon, FL 33050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stael.com	Stael Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_Official CC Service List
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
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_Official CC Service List
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_Official CC Service List
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_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
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_Official CC Service List
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_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official CC Service List
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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_Official CC Service List
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_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
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_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official CC Service List
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_Official CC Service List
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_Official CC Service List
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E  Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_Official CC Service List
Eilanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661  Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave  Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_Official CC Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official CC Service List
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_Official CC Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Saveikoul	rsaveikoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Janet	Shaddix Eiling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Staffon	restaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_Official CC Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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_Official CC Service List
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-442_Official CC Service List

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_20-429_M-20-429
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_20-429_M-20-429
Jessica L	Bayles	Jessica.Bayles@stael.com	Stael Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Sara	Bergan	sebergan@stael.com	Stael Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Kristin	Berkland	krisin.berkland@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
David F.	Boehm	dboehm@bklawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_20-429_M-20-429
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-429_M-20-429
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-429_M-20-429
David	Cartella	David.Cartella@cliffsnt.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300  Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_20-429_M-20-429
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_20-429_M-20-429
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_20-429_M-20-429
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-429_M-20-429
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-429_M-20-429
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-429_M-20-429
Barbara	Gervais	toftem@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_20-429_M-20-429
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-429_M-20-429
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_20-429_M-20-429
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-429_M-20-429
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_20-429_M-20-429
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_20-429_M-20-429
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Travis	Kolari	N/A	Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	OFF_SL_20-429_M-20-429
Michael	Krikava	mkrikava@taflaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_20-429_M-20-429



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-429_M-20-429
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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Annie	Levenson Falk	annieif@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-429_M-20-429
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Patrick	Loupin	PatrickLoupin@PackagingCorp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-429_M-20-429
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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_20-429_M-20-429
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_20-429_M-20-429
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429

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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_20-429_M-20-429
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_20-429_M-20-429
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David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-429_M-20-429

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Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_20-429_M-20-429
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_20-429_M-20-429
Eilanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_20-429_M-20-429
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_20-429_M-20-429
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-429_M-20-429
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429

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Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_20-429_M-20-429
Generic Notice	Residential Utilities Division	residential.utilities@eg.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_20-429_M-20-429
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_20-429_M-20-429
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_20-429_M-20-429
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-429_M-20-429

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Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_20-429_M-20-429
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Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_20-429_M-20-429
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_20-429_M-20-429
Kristin	Stastrny	kstastrny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-429_M-20-429
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Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_20-429_M-20-429
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56637	Electronic Service	No	OFF_SL_20-429_M-20-429
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-429_M-20-429
Karen	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_20-429_M-20-429
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_20-429_M-20-429

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Mary	Wolter	mary.wolter@weceenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-429_M-20-429
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_20-429_M-20-429