



AN ALLETE COMPANY

*David R. Moeller*  
*Senior Attorney*  
218-723-3963  
*dmoeller@allete.com*

December 30, 2015

**VIA ELECTRONIC FILING**

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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-15-984

Dear Mr. Wolf:

Please find attached for filing Minnesota Power's Reply Comments in the above-referenced Docket.

Yours truly,

David R. Moeller

DRM:sr  
Attach.  
cc: Official Service List

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

\*\*\*\*\*

Docket No. E015/M-15-984

In the Matter of a Petition to Ensure  
Competitive Electric Rates for Energy-  
Intensive Trade-Exposed Customers

**MINNESOTA POWER  
REPLY COMMENTS**

\*\*\*\*\*

Minnesota Power provides the following Reply Comments in response to the Initial Comments submitted on December 21, 2015 and the Minnesota Public Utilities Commission’s (“Commission”) November 19, 2015 Notice (“Notice”) in this Docket. Minnesota Power (“Company”) will address four main issues in these Reply Comments: 1) the application of the Energy-Intensive Trade-Exposed (“EITE”) Statute to Minnesota Power’s Petition; 2) the net benefit to the utility standard; 3) the net benefit to the state standard; and 4) other EITE issues within the limited scope of the Commission’s Notice.

**1) The Application of the Energy-Intensive Trade-Exposed (“EITE”) Statute to Minnesota Power’s Petition**

As Minnesota Power previously stated, the Petition is intended to implement “the energy policy of the state of Minnesota to ensure competitive electric rates for energy-intensive trade-exposed customers.” Minn. Stat. § 216B.1696, subd. 2(a). To accomplish this state directive, the Legislature provided that “an investor-owned electric utility that has at least 50,000 retail electric customers, but no more than 200,000 retail electric customers,<sup>1</sup> shall have the ability to propose various EITE rate options within [its] service territory under an EITE rate schedule that include, but are not limited to, fixed-rates, market-based rates, and rates to encourage utilization of new clean energy technology.” Minn. Stat. § 216B.1696, subd. 2(a). Minnesota Power undoubtedly meets that definition, and the proposed EITE Customers Rider is clearly an EITE rate schedule. Furthermore, the EITE Statute does not require that the Commission approve individual

---

<sup>1</sup> See, e.g., MPUC Docket No. E015/CN-12-1163, Administrative Law Judge’s Report dated March 16, 2015, Finding 60 (“Minnesota Power, a division of ALLETE, was incorporated in 1906 and serves approximately 144,000 retail electric customers and 16 municipal systems across a 26,000 square mile service area in central and northeastern Minnesota.”).

customers receiving an EITE discount, only that an EITE rate schedule be reviewed under the standard set forth under Minn. Stat. § 216B.1696, subd. 2(b). The Minnesota Department of Commerce’s (“Department of Commerce” or “Department”) December 21, 2015 Comments incorrectly apply both the EITE Statute and even the Commission’s Notice to questions of customer eligibility and the Commission’s charge under the statute. The EITE Statute itself defines which customers meet the definition of an EITE customer, and that what the Commission approves upon a finding of net benefit to the utility or the state is an “EITE rate schedule and any corresponding EITE rate.”<sup>2</sup>

In addition, the Commission’s Notice requested comments on the “types of customers eligible for the rate”, not whether Minnesota Power provided evidence that these customers are eligible. Unlike an individual electric service agreement reviewed under Minn. Stat. § 216B.05, Minnesota Power is proposing tariff language in its EITE Customers Rider, not customer specific rates. The EITE Customers Rider does not name individual customers, it specifies only that customers meet the statutory definitions and Minnesota Power’s proposed service conditions, as allowed under the EITE Statute. Minn. Stat. § 216B.1696, subd. 1(d) defines an EITE rate schedule as “a rate schedule under which an investor-owned electric utility may set terms of service to an individual or group of energy-intensive trade-exposed customers.” Furthermore, despite the Department of Commerce’s conjecture, the EITE Statute does not require that Minnesota Power set “terms of service”; nevertheless, on pages 8 through 10 of the Petition, Minnesota Power described the proposed terms of service and justification for why a “group of energy-intensive trade exposed customers” should receive the benefits under the EITE Customers Rider.

The Minnesota Legislature further narrowed the scope of review and requirements for any utility proposing an EITE rate schedule in two significant ways. First, the Legislature succinctly declared at the front end of the bill it passed that: “It is the energy policy of the state of Minnesota to ensure competitive electric rates for energy-intensive trade-exposed customers.”

---

<sup>2</sup> The Department of Commerce’s request for documentation overlooks the signed Letter Agreements attached to the Petition that included Commission docket references and orders for each individual EITE customer’s Commission approved electric service agreements that were reviewed by the Department of Commerce. The request also ignores the process established by the Commission for reviewing whether many of these same customers (with the same statutory definitions) are exempt from the Solar Energy Standard. Minn. Stat. § 216B.1691, subd. 2f(d) and MPUC Docket No. E999/CI-13-542.

Minn. Stat. § 216B.1696, subd. 2(a).<sup>3</sup> Clearly, this direct policy statement so prominently placed in the statute indicates the primary point and the purpose of the law that was passed is ensuring competitive rates for energy-intensive trade-exposed industry. It is remarkable that the Department offered no interpretation or implementation guidance on this competitive rate policy given its long standing role as an intervenor offering comments on energy policy in many other proceedings.<sup>4</sup> Except for a brief citation in response to the alternative rate design issue raised in the Notice (see page 16), the Department of Commerce’s Comments failed to address how this competitive rate energy policy of the state of Minnesota authorized by the Legislature should be interpreted, let alone implemented. Second, the Minnesota Legislature under Minn. Stat. § 216B.1696, subd. 2(b) in enacting the law that is the subject of this Petition required that: “Notwithstanding Minnesota Statutes, section 216B.03, 216B.05, 216B.06, 216B.07, or 216B.16, the Commission shall, upon a finding of net benefit to the utility or the state, approve an EITE rate schedule and any corresponding EITE rate.” The Department of Commerce did not address this statutory directive in its Comments.<sup>5</sup> In fact, the EITE Statute specifies the scope of the Commission’s review by excluding from its general regulatory review the following Minnesota Statutes: Minn. Stat. §§ 216B.03 (reasonable rate), 216B.05 (filing schedules, rules and service agreements), 216B.06 (receiving different compensation), 216B.07 (rate preference prohibited); and 216B.16 (rate change, procedure, hearing).

Overall, the EITE Statute directs the Commission to approve an EITE rate schedule and any corresponding EITE rate “upon a finding of net benefit to the utility or the state”. Minnesota Power’s reply to arguments brought forward regarding that legislatively limited standard is set forth in the next two sections.

---

<sup>3</sup> The Legislature has declared only a handful of important areas for which it is the energy policy of the State of Minnesota including energy conservation goals (Minn. Stat. § 216B.2401); energy planning goals (Minn. Stat. § 216C.05); hydrogen energy economy goal (Minn. Stat. § 216B.8109); greenhouse gas emissions control goal (Minn. Stat. § 216H.02); and a solar energy goal (Minn. Stat. § 216B.1691, subd. 2f(c)).

<sup>4</sup> See also, Minn. Stat. § 216A.07, subd. 3a that in addition to its role intervening in Commission dockets, the Department “has the duty and power to represent the interests of Minnesota residents, businesses, and governments before bodies and agencies outside the state that make, interpret, or implement regional, national, and international energy policy and that regulate and implement regional or national energy planning or infrastructure development.”

<sup>5</sup> The Department of Commerce’s comments on page 8 truncate this statutory subdivision to just the criteria and not the Commission’s limited review. The Department of Commerce’s footnote 3 on page 7 does acknowledge the notwithstanding language in evaluating whether a variance for tariff pages is necessary. Regarding the variance request, Minnesota Power believes its request is consistent with prior Commission approvals as noted in the Department’s Comments.

## 2) **The Net Benefit to the Utility Standard**

The Department recommends rejection of the EITE Petition by suggesting that the Company failed to meet the Department's interpretation of the demonstration of the net benefit to the utility. The Department asserts the Company should have used some form of present value cash flow for a cost benefit analysis commonly used to demonstrate the net benefit of energy conservation programs. There is no basis nor, more importantly, a need for attempting to manufacture an economic analysis of the impact of the loss of large industrial load to Minnesota Power. This suggestion appears to indicate a lack of understanding of the magnitude (about 60%) of revenue derived from the EITE customers on Minnesota Power's system as addressed in the Petition, and how the loss of industrial load would impact the Company. Undoubtedly, the loss of approximately 60% of any utility's retail sales, or the loss of any large portion of Minnesota Power's EITE customer sales would have a negative impact on the utility and its remaining customers who would be assigned costs unrecovered due to lost sales. Indeed and as an example, the loss of one large industrial customer, National Steel in October 1993, resulted in an immediate rate case filing on January 3, 1994 by Minnesota Power to deal with the significant loss of revenue.<sup>6</sup> For this reason, the Commission should reject the Department's assertions concerning the need for the contrivance of a calculation of present cash flow within a cost benefit analysis to determine the benefit of retaining Large Power load on Minnesota Power's system. It is obvious looking at Minnesota Power's revenues that the loss of EITE customers or significant portions of their sales will negatively impact Minnesota Power and its remaining customers.

The Department also does not consider the other Company level macro-factors that would impact Minnesota Power and its customers negatively such as reductions in credit and debt ratings and access to capital necessary to meet federal and state regulatory commitments if revenues were lost from EITE customers. It also does not consider the potential impact of Large Power load loss on stock value, which would also have a long term negative impact on all customers' costs, and result in increased revenue requirements.

---

<sup>6</sup> MPUC Docket No. E015/GR-94-001. The subsequent reopening of National Steel in July 1994 after the rate case record had closed led to a motion by Minnesota Power to reopen the record to recognize the change in test year conditions that was accepted by the ALJ. MPUC Order Dated November 22, 1994.

The energy policy being implemented under the EITE Statute, "...to ensure competitive electric rates for energy-intensive trade-exposed customers", and the related public interest benefit supported through that implementation, as described in the Petition, are clear. Minnesota Power's EITE customers, who must remain globally competitive to succeed, comprise the majority of the Company's sales. The Company's Petition demonstrates the negative economic impact to the utility of losing large industrial sales and it provides a sound and reasoned basis for providing discounts to its energy-intensive trade-exposed customers to aid their product competitiveness within the provisions of the EITE Statute.<sup>7</sup>

Both the Office of Attorney General ("OAG") and Department assert in their reviews of the net benefit calculation and associated cost recovery that the Petition does not meet the requirements of the EITE Statute as it does not consider the impacts on the utility and its customers with and without the EITE discount rate. While it is not possible to reliably predict how the proposed changes in rates would impact energy usage of the customers in the various rate classes impacted by the EITE rate and associated cost recovery, the Company's proposed tracker in Section IV.F. of the Petition would capture the differences between the projected standard rate revenues and the actual after-the-fact revenues recorded from the impacts of the EITE riders.

Finally, the Department, the OAG and other commenting parties ignore the benefits large industrial customers have on Minnesota Power's system and most specifically their critically important contributions toward fixed cost recovery. This fixed cost recovery benefit oversight is remarkable particularly with respect to the Department which has previously commented on its positive effects. As one example, when reviewing the US Steel combined electric service agreement in 2005, the Department stated:

Minnesota Power provides in its filing an analysis of the benefits to Minnesota Power's customer of having US Steel on MP's system, contributing to fixed cost recovery. The discussion also notes ways of ensuring US Steel pays for its costs it imposes on MP's system. The Department agrees that the goal of ensuring that US Steel remains on MP's system, contribution toward fixed costs, is important

---

<sup>7</sup> Minnesota Power agrees with LPI-EITE's December 21, 2015 Comments at pages 9-10 that the EITE Statute's net benefit standard is met, even if the proposal is not perfect and that the status quo from failure to implement state energy policy could lead to a negative impact.

since MP's other customers would then face a lower risk of having to pay for these fixed costs.<sup>8</sup>

Likewise, the Department recently stated in its Comments regarding a proposed extension of Boise's electric service agreement from 2013 to 2023:

Such an extension would be beneficial to both MP and its ratepayers. The proposed rates for Boise include a contribution to MP's fixed costs and thus the Company's ratepayers would benefit from such a contribution that would otherwise have to be collected from them. The extension would benefit MP by providing it with additional stability in its revenues by having one of its largest customers under contract through December 31, 2023.<sup>9</sup>

The proposed terms of service under the EITE Customers Rider, including a minimum two-year commitment under a Commission-approved electric service agreement, are consistent with prior Large Power regulatory treatment and demonstrate a long-term commitment by these customers to the utility. Other ratepayers should not have to support the competitiveness of customers who do not make a commitment to remain in the region, and Minnesota Power believes the connection between an EITE customer and its commitment to the region to be a crucial ingredient in the determination of the "net benefit to the utility or the state."

### **3) The Net Benefit to the State Standard**

The Department recommends the Commission limit its review to energy related or rate making considerations only and not contemplate regional economic impacts when considering the net benefit to the State of implementing the EITE statute. Both societal and regional economic impact considerations have long been an acceptable factors for informing the decision making process on issues in front of the Commission such as with environmental retrofits to generation facilities,<sup>10</sup> the potential closure of Company facilities<sup>11</sup> and the addition of renewable resources.<sup>12</sup> Moreover, the economic status of a utility's service territory, including and

---

<sup>8</sup> MPUC Docket No. E015/M-05-1175, Department Comments dated August 15, 2005.

<sup>9</sup> MPUC Docket No. E015/M-13-1084, Department Comments dated December 24, 2013. *See also, e.g.*, MPUC Docket No. E015/M-12-1025, Department Comments dated October 16, 2012 regarding Amendment to NewPage electric service agreement ("The extension of the Agreement through, at least, December 31, 2022, would benefit MP's other ratepayers by lowering their share of MP's total fixed costs.").

<sup>10</sup> Minn. Stat. § 216B.6851, subd. 6(b).

<sup>11</sup> Minn. Stat. § 216B.16, subd. 6.

<sup>12</sup> Minn. Stat. § 216B.1691, subd. 9.

especially sustained regional economic health and employment levels, clearly has an impact on the ongoing ability of all customers to pay for the system that serves them. It is obvious that the presence or loss of major industry and the primary and secondary jobs they create can result in positive or negative economic effects on a utility and its customers.

The Department goes on to recommend a complex, integrated resource plan-like analysis that it suggests should be completed to determine the net benefit to the State if the Commission decides to consider non-energy related benefits and costs. As with the net benefit to the utility, the impact of large industrial customers' operations on the regional economy of Northeastern Minnesota is significant. Nearly 40 percent of the regional economy is driven by these customers' operations. Based on the economic impact information it provided in its Petition, Minnesota Power thinks it is obvious EITE customers are important to the economic health of Northeastern Minnesota, and thus their operation significantly benefits the entire state of Minnesota by helping to sustain the economy and tax revenue in that portion of the state. If the Department desired to perform the kind of analysis it is suggesting, the EITE Statute provides up to \$854,000 directly to the Commissioner of Commerce per biennium to assist the Department evaluating and implementing a petition filed under the EITE Statute.<sup>13</sup>

#### **4) Other Issues within the Limited Scope of the Commission's Notice**

Many of the comments by the consumer groups are outside the directive provided in the Commission's Notice and, to the extent applicable, Minnesota Power reserves the right to provide further comments in the future.

Beyond the Company's disagreements with the Department's assertions as noted elsewhere in these Comments, the Company notes that the Department includes several inaccuracies within its Comments that the Company would like to address. Commission Staff and other parties submitted Information Requests to the Company or communicated with the Company to clarify their understanding of facts presented by the Company in its Petition. The Department did not communicate with the Company either formally or informally before submitting its Comments.

---

<sup>13</sup> Minn. Stat. § 216B.1696, subd. 4.



In Section IV.C., Minnesota Power included a rigorous process for EITE customer qualification, a communication plan, the proposed text of customer communications, cost allocation considerations and data privacy considerations. These proposed processes and procedures would be implemented to document and support the EITE discount rate and exemption from the cost recovery rider for customers that meet the EITE Statute definitions and low-income customers as required by the EITE Statute. The basis for these processes is consistent with the recently approved processes to exempt certain customers from the Company's recovery of costs to meet the State's Solar Energy Standard.<sup>14</sup> The Department's suggestion that these processes are not established or evident to support EITE rider implementation is inaccurate.

The Department asserts an inaccurate depiction of the Company's recovery of renewable energy costs in its Comments. The Company would like to point out that Minnesota Power's wholesale customers are allocated approximately 15 percent of these costs under their contracts which results in approximately 50 percent of the retail costs for renewables being recovered from EITE customers.

Various parties commented on the applicability of Minnesota Power's proposed EITE Current Cost Recovery Rider to low-income customers. While presumably outside the scope of the Commission's Notice, Minnesota Power asserts that its proposal complies with the EITE Statute requirements for low-income customer exemptions and funding under subdivision 3.<sup>15</sup> Minnesota Power will continue to work with stakeholders to fully implement and increase participation in low-income programs throughout Minnesota Power's service territory,<sup>16</sup> such as

---

<sup>14</sup> MPUC Docket No. E999/CI-13-542. Notice of Approval of Minnesota Power's Solar Energy Standard Compliance Filing.

<sup>15</sup> The Notice does include this issue: "Does MP's action on the deposit of \$10,000 for low-income funding comply with Minn. Stat. §216B.1696, subd. 3, and is it reasonable?" Minnesota Power's December 4, 2015, Supplemental Filing documents how the Company has met this statutory requirement. The cover letter to AEOA, the administering agency for the Company's Customer Affordability of Residential Electricity ("CARE") program, describes how the funds are to be used to expand the outreach of the affordability program, as specified in the statute. In addition, if the additional outreach is successful in increasing CARE program participation, it will also likely increase the number of LIHEAP-qualified customers who are exempt from application of the EITE Current Cost Recovery Rider.

<sup>16</sup> The OAG's Comments on page 5 and footnote 7 incorrectly list that Minnesota Power serves customers in 7 counties. Minnesota Power serves retail customers in 15 counties throughout northern and central Minnesota including: Lake, St. Louis, Carlton, Pine, Itasca, Koochiching, Cass, Hubbard, Wadena, Todd, Crow Wing, Morrison, Stearns, Benton and Otter Tail counties. Minnesota Power does not serve customers in Aitkin County. See <http://www.mngeo.state.mn.us/eusa> for service territory boundaries and maps.

its Customer Affordability of Residential Electricity (“CARE”) Rider, consistent with the low-income customer requirements under state and federal law.

### **Conclusion**

Minnesota Power respectfully requests that the Commission approve the Company’s EITE Petition on a timely basis consistent with Minn. Stat. § 216B.1696, subd. 2(c). Minnesota Power’s proposed EITE riders implement state energy policy and are clearly in the public interest when the obvious benefits of retaining Minnesota Power’s large industrial customers are considered, including the significant economic benefits they contribute to Minnesota Power, all of its other customers, the entire Northeastern Minnesota region and the State of Minnesota.

Dated: December 30, 2015

Respectfully submitted,



David R. Moeller  
Senior Attorney  
Minnesota Power  
30 West Superior Street  
Duluth, MN 55802  
(218) 723-3963  
dmoeller@allete.com

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 **30<sup>th</sup> day of December, 2015**, she served Minnesota Power's Reply Comments in Docket No. E015/M-15-984 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 service list were served as requested.



---

Susan Romans

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	Yes	OFF_SL_15-984_Official Service List
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	No	OFF_SL_15-984_Official Service List
Gary	Anderson	N/A	Stora Enso	Duluth Paper Mill 100 N. Central Avenue Duluth, MN 55807	Paper Service	No	OFF_SL_15-984_Official Service List
Thomas	Bailey	tbailey@briggs.com	Briggs And Morgan	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
Richard	Baxendale		Boise Cascade Corporation	926 Harvard Avenue East  Seattle, WA 98102	Paper Service	No	OFF_SL_15-984_Official Service List
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-984_Official Service List
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
William A.	Blazar	bblazar@mnychamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
David F.	Boehm		Boehm, Kurtz & Lowry	Suite 1510 36 East Seventh Street Cincinnati, OH 45202	Paper Service	No	OFF_SL_15-984_Official Service List
William	Bond	william.bond@arcelormittal.com	ArcelorMittal USA - Minorca Mine Inc.	PO Box 1 5950 Old Highway 53 Virginia, MN 55792	Electronic Service	No	OFF_SL_15-984_Official Service List
Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_15-984_Official Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_15-984_Official Service List
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_15-984_Official Service List
Nancy	Cashman		The Salvation Army	P.O. Box 16052  Duluth, MN 55816	Paper Service	No	OFF_SL_15-984_Official Service List
Greg	Chandler	greg.chandler@upm-kymmene.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_15-984_Official Service List
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_15-984_Official Service List
Jack	Croswell	N/A	Hibbing Taconite	P O Box 589  Hibbing, MN 55746	Paper Service	No	OFF_SL_15-984_Official Service List
Leigh	Currie	lcurrie@mncenter.org	Minnesota Center for Environmental Advocacy	26 E. Exchange St., Suite 206  St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
Derick O.	Dahlen	derick.dahlen@avantenergy.com	Avant Energy Services	220 S. Sixth St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Darland	N/A	Sappi Fine Paper North America	255 State St Fl 4  Boston, MA 02109-2617	Paper Service	No	OFF_SL_15-984_Official Service List
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, 1400 BRM Tower St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-984_Official Service List
Darla	Frink	N/A	City of Cohasset	305 Northwest 1st Avenue  Cohasset, MN 55721	Paper Service	No	OFF_SL_15-984_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-984_Official Service List
John R.	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
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_15-984_Official Service List
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Janice	Hall	N/A	Cook County Board of Commissioners	411 W 2nd St Court House Grand Marais, MN 55604-2307	Paper Service	No	OFF_SL_15-984_Official Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official 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_15-984_Official Service List
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	Yes	OFF_SL_15-984_Official 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_15-984_Official Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_15-984_Official 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_15-984_Official Service List
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	213 East 4th Street Suite 412  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
Trish	Klein	trish.klein@co.itasca.mn.us	Itasca County	123 NE Fourth Street  Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_15-984_Official Service List
Travis	Kolari	N/A	Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	OFF_SL_15-984_Official Service List
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_15-984_Official 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_15-984_Official Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	OFF_SL_15-984_Official Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050  Boise, ID 83799-0050	Electronic Service	No	OFF_SL_15-984_Official Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
David	Lund		Legal Aid of Minnesota	302 Ordean Building 424 W. Superior Street Duluth, MN 55802	Paper Service	No	OFF_SL_15-984_Official Service List
Casey	MacCallum	casey@appliedenergyinnovations.org	Applied Energy Innovations	4000 Minnehaha Ave S  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-984_Official Service List



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Paula	Maccabee	Pmaccabee@justchangela w.com	Just Change Law Offices	1961 Selby Ave  Saint Paul, MN 55104	Electronic Service	No	OFF_SL_15-984_Official Service List
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_15-984_Official Service List
Sarah	Manchester	N/A	Sappi Fine Paper North America	255 State St Fl 4  Boston, MA 02109-2617	Paper Service	No	OFF_SL_15-984_Official Service List
Tony	Mancuso	mancusot@stlouiscountym n.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_15-984_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-984_Official 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_15-984_Official Service List
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_15-984_Official 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_15-984_Official Service List
David	McMillan	dmcmillan@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	Yes	OFF_SL_15-984_Official Service List
Angie	Miller	N/A	Community Action Duluth	2424 W. 5th St Suite 102 Duluth, MN 55806	Paper Service	No	OFF_SL_15-984_Official Service List

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	Yes	OFF_SL_15-984_Official Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_15-984_Official Service List
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List
Richard L.	Morgan		Sappi Fine Paper North America	P.O. Box 511 2201 Avenue B Cloquet, MN 55720	Paper Service	No	OFF_SL_15-984_Official Service List
Don	Ness	dness@duluthmn.gov	City of Duluth	411 W 1st St Rm 403  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
David W.	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official 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_15-984_Official 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_15-984_Official Service List
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East  St. Paul, MN 551012198	Electronic Service	No	OFF_SL_15-984_Official Service List
Catherine	Peterson	N/A	Duluth Community Action Program, Inc.	2424 W 5th St #102  Duluth, MN 55806	Paper Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_15-984_Official Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028  Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_15-984_Official Service List
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street  Duluth, MN 55806	Electronic Service	No	OFF_SL_15-984_Official Service List
Santi	Romani	N/A	United Taconite	P O Box 180  Eveleth, MN 55734	Paper Service	No	OFF_SL_15-984_Official Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_15-984_Official Service List
Michelle	Rosier	michelle.rosier@sierraclub.org	Sierra Club	2327 E. Franklin Avenue  Minneapolis, MN 554061024	Electronic Service	No	OFF_SL_15-984_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
Thomas	Scharff	thomas.scharff@newpagecorp.com	New Page Corporation	P.O. Box 8050 610 High Street Wisconsin Rapids, WI 544958050	Electronic Service	No	OFF_SL_15-984_Official Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Schmidt		USG Interiors, Inc.	35 Arch Street  Cloquet, MN 55720	Paper Service	No	OFF_SL_15-984_Official Service List
Matthew J.	Schuerger P.E.	mjsreg@earthlink.net	Energy Systems Consulting Services, LLC	PO Box 16129  St. Paul, MN 55116	Electronic Service	No	OFF_SL_15-984_Official Service List
Robert H.	Schulte	rhs@schulteassociates.co m	Schulte Associates LLC	1742 Patriot Rd  Northfield, MN 55057	Electronic Service	No	OFF_SL_15-984_Official Service List
Joe	Scipioni		PolyMet Mining, Inc.	P.O. Box 475 County Highway 666 Hoyt Lakes, MN 55750	Paper Service	No	OFF_SL_15-984_Official Service List
Britt	See Benes	britt@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_15-984_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	Ste 122 9100 W Bloomington Frwy Bloomington, MN 55431	Electronic Service	No	OFF_SL_15-984_Official Service List
Doug	Shoemaker	dougs@mnRenewables.org	MRES	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_15-984_Official Service List
Corbin	Smyth	N/A	UMD Student Life	1208 Kirby Dr  Duluth, MN 55812	Paper Service	No	OFF_SL_15-984_Official Service List
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-984_Official Service List
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_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M.	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	470 U.S. Bank Plaza 200 South Sixth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-984_Official 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_15-984_Official Service List
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-984_Official Service List
David	Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-984_Official Service List
Timothy	Tomsich	timothy.tomsich@cliffsNR.com	Hibbing Taconite Company	4950 Highway 5 North  Hibbing, MN 55746	Paper Service	No	OFF_SL_15-984_Official Service List
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_15-984_Official Service List
Karen	Turnboom	karen.turnboom@newpagecorp.com	NewPage Corporation	100 Central Avenue  Duluth, MN 55807	Electronic Service	No	OFF_SL_15-984_Official Service List
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710  St. Paul, MN 55102	Electronic Service	No	OFF_SL_15-984_Official Service List
Dan	Williams		Lutheran Social Services	600 Ordean Building 424 W. Superior Street Duluth, MN 55802	Paper Service	No	OFF_SL_15-984_Official Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-984_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_15-984_Official Service List