

LARGE POWER INTERVENORS

Information Request

Docket Numbers: E-015/RP-25-127

Date of Request: January 21, 2026

Requested From: Minnesota Power

Response Requested: February 2, 2026

By: Andrew P. Moratzka, Amber S. Lee, and Eden A. Fauré

Information Request No. 31

Reference the Clean Firm Plan Filing and Page 10 of LPI's December 1, 2025, Comment filed in three dockets, including this resource planning docket, MPUC Docket No. E015/RP-25-127. Please:

- a. Admit that the information requested by LPI was not included in the Clean Firm Plan Filing.
- b. Update Table 1 from Appendix L to the IRP with the following information:
 - i. A current and accurate starting point for 2026 average rates for each of the customer classes; and
 - ii. A current and accurate projection of all-in rate increases each customer class is projected to experience over the 2026-2029 timeframe.

RESPONSE:

As explained in Minnesota Power's comments filed in its Transmission Cost Recovery Rider (Docket No. E015/M-24-382) and Renewable Resources Rider (Docket No. E015/M-25-373) in response to Large Power Intervenors' December 1, 2025 comments, there are no inconsistencies or discrepancies across the three dockets in the Company's calculations of current average cost of energy. Minnesota Power has used the same consistent approach for years: the average current rates used in rate impact calculations are updated with the latest available rates at the time the filing is being prepared. The starting point for 2026 average rates included in the Integrated Resource Plan ("IRP") Initial Filing were current and accurate at the time of the filing. Therefore, there was no need to provide updated average rate information in any of the three dockets.

The Company has refreshed the starting point for 2026 average rates for each of the customer classes with rates in effect as of January 1, 2026. Since the IRP Initial filing analysis was conducted, there have been changes to: base rates to incorporate a lower 9.65% ROE, the fuel and purchased energy adjustment, the capacity and expense and revenue adjustment, conservation

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program adjustment, and the solar factor adjustment. Table 1 from Appendix L to the IRP has been updated with this information in LPI IR 0031.01 Attach. The information included in the IRP Initial Filing was current and accurate at the time the analysis was performed.

Minnesota Power does not have a projection of all-in rate increases into the future, as further explained in the Company's response to LIP IR 0030. By definition, the only current and accurate rates are those that have been approved by the Minnesota Public Utilities Commission. This is precisely why the longstanding Company policy is to use approved rates as a starting point when calculating customer rate impacts.

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