



August 4, 2025

Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

VIA EFILING

Re: In the Matter of the Petition of Minnesota Power for Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners
OAH Docket Number: 25-2500-40339
PUC Docket Number: E-015/PA-24-198

Dear Mr. Bull,

The Energy CENTS Coalition (“ECC”) appreciates the efforts of ALLETE, Global Infrastructure Partners and Canadian Pension Plan Investment Board (collectively “the Partners”), and the Minnesota Department of Commerce in reaching a settlement in the above-referenced matter (“the Settlement”). ECC believes that the stipulations of the Settlement advance the public interest, and we respectfully request that the Commission approves it.

Our comments are structured as follows. First, we provide context on the priorities of ECC in our intervention in this matter. Second, we identify broad themes that we believe have shaped the record and our own analysis thereof. Finally, we highlight key stipulations within the Settlement that we believe underscore the compatibility of the acquisition with the public interest.

I. ECC intervened to advocate on behalf of low- and fixed-income Minnesota Power customers.

On September 13, 2024, ECC petitioned to intervene in this matter with the stated aim of advocating specifically on behalf of low-income customers. As noted in our filing, ECC has a long history of advocating on behalf of Minnesota Power’s (“MP”) low- and fixed-income customers through interventions on rate design and most especially through extensive consultation and collaboration on program design and oversight of the Customer Affordability of Residential

Electricity (CARE) program. In intervening, ECC sought to review the potential benefits and harms of the transaction for low-income customers broadly with a particular focus on CARE participants.

II. Key themes regarding the public interest standard in acquisition proceedings and the categories of stipulations in this Settlement

The question before the Commission is whether the proposed transaction is compatible with the public interest or, as ECC more specifically construed it in our surrebuttal:

The foundational question before the Commission is whether there are categorical distinctions between publicly and privately held utilities that would cause the acquisition to be incompatible with the public interest, *specifically within the regulatory landscape of Minnesota*. That is, does the transfer to private ownership present a novel harm to consumers that is inadequately contemplated by the legal and regulatory restrictions of the State of Minnesota.¹

While there are statutory differences between the requirements imposed on investor-owned utilities and other ownership models, such as cooperatively and municipally owned utilities, requirements for investor-owned utilities under state law remain in effect whether the company is traded publicly or privately. To our knowledge, no party in this matter has demonstrated that the acquisition would diminish the extent to which MP is subject to the requirements for investor-owned utilities in Minnesota Statutes Chapter 216B.

The question thus becomes whether the statutory requirements remain adequate for a privately owned utility or whether the process of going private undermines Minnesota's existing method of regulatory oversight. ECC indicated its support for the acquisition, not out of a moral assessment of the Partners and their intentions, but out of a deep conviction that the regulatory guardrails of this State are adequate to advance the public interest irrespective of the intentions of utilities. Parties opposing the acquisition have indicated they disagree, alleging that there is a categorical difference between the profit motive of publicly- and privately-traded companies that would make ALLETE under the ownership of Partners into an unwilling participant in the regulatory compact, even if the compact's legal requirements still technically apply. That disagreement is the central controversy in this matter.

As a result, the Commission will see two types of commitments in the Settlement:

- 1) Novel financial and operational commitments by MP and the Partners that are not explicitly required by law, and
- 2) Affirmations of and commitments to existing statutory requirements.

¹ ECC Surrebuttal at 1.

The former is to be expected. The Settlement contains meaningful commitments by the Partners that help mitigate the risks of potential harm under new leadership. The latter category – affirmation of existing law – could reasonably be deemed as superfluous. Why commit to that which is already required by law? The reason is that, practically speaking, people’s lives are not governed by laws; they are governed by legal interpretation. ECC would argue that the exercise of jointly acknowledging regulatory requirements and offering Parties the opportunity to ground themselves in a shared interpretation of those requirements works to directly mitigate the potential harm raised by parties in this matter of a future in which the Company complied in law but not spirit with the foundational responsibilities of a utility within Minnesota’s regulatory compact.

III. Review of relevant stipulations

Below, ECC highlights the stipulations of the Settlement that we believe most acutely speak to the public interest in this proceeding. They are as follows:

1.3. To alleviate concerns about the availability of investment funds, Alloy Parent shall provide to Minnesota Power equity financing, including but not limited to equity infusion, deferral or reinvestment of dividends, or a combination of both, in an amount at least equal to the equity financing required to fund Minnesota Power’s 5-year capital investment plan reflected in its February 2025 10-K filing, subject to prospective reasonable and prudent plan adjustments. This funding commitment will not be used to establish a higher or lower ROE.

1.4 To ensure enforceability of the capital commitment, ALLETE shall not make any dividend payments to Alloy Parent (the entity through which the Partners would receive any dividends from the company) unless, at the time the dividend payment would be made, Minnesota Power has been provided sufficient equity capital needed up to that point in time to fund the 5- year capital investment plan in the February 2025 10-K, subject to prospective reasonable and prudent plan adjustments by the company.

The Company has named access to capital as the driving need that prompted it to seek new ownership. Other parties in this matter raised concerns that nothing would legally compel the Partners to supply ALLETE with capital. By predicated the Partners’ ability to issue dividends to the full funding of the 5-year capital plan, the Department has succeeded in binding the Partners to a clear financial incentive to invest in ALLETE.

1.6 ALLETE shall not make any dividend or distributions to Alloy Parent unless at least one senior unsecured credit rating is investment grade or above. For the avoidance of doubt, the limit on distributions shall not apply to payments made by ALLETE to any Alloy Parent entities or ALLETE subsidiaries under the tax sharing agreement.

Similarly, Stipulation 1.6 applies a clear (if indirect) financial incentive to contain rate growth. As noted elsewhere in the record, credit rating agencies have begun citing concerns about affordability as a reason to downgrade utilities.² If the Partners were to attempt to maximize profits from the Company by disproportionately raising rates (subject to Commission approval), they would do so at the risk of diminishing their credit rating. Stipulation 1.6 ensures that, if that were to happen, they would also endanger their ability to issue dividends.

1.47 Regarding energy affordability for residential customers, there will be no reduction in Minnesota Power’s currently designed affordability program budget (formally referred to as the Customer Affordability of Residential Electricity program or “CARE”) or the current CARE program eligibility process for the duration of the Partners’ ownership of ALLETE.

1.48 The Partners will provide a financial contribution with the objective to significantly reduce residential arrears to pre-COVID-19 balances or lower, an outcome that would benefit all Minnesota Power customers while providing account balance relief to the most economically challenged residential customers. This contribution will be used to temporarily augment the flat \$20 discount and Arrearage Forgiveness components of Minnesota Power’s CARE program. A similar arrearage forgiveness offering will be developed on a limited scope and duration basis for non-income qualified residential customers that successfully enter into and complete a 24-month payment arrangement for arrears, pending confirmation of billing system capability and reasonable level of effort... The total financial contribution is not to exceed the total balance of residential customer arrears as of the approval date.

Stipulations 1.47 and 1.48 enshrine an agreement between ECC, ALLETE and the Partners. ECC thanks all parties for the inclusion of these provisions in the ultimate settlement. As we have stated previously, these concessions offer meaningful assurance to low-income customers that the quality of MP’s affordability programs will not deteriorate under new ownership. In the normal course of operations, funding for affordability programs must come from other ratepayers, many of whom are themselves struggling to get by. These concessions offer a unique opportunity to draw investment from shareholders, and not other customers, in these vital programs.

The agreement also offers a historic opportunity to extend arrearage forgiveness to non-income qualified customers at a crucial moment. As currently designed, CARE is tailored to customers who have been determined income-eligible through the federal energy assistance application process, a program which is currently at risk of elimination.³ ECC intentionally and collaboratively worked with Minnesota Power to identify a meaningful contribution toward reducing residential

² Walters Direct at 14.

³ LeMoult, Craig. “Trump budget proposal would end energy assistance program for low-income Americans.” National Public Radio – Morning Edition. May 15, 2025.

arrears that would build upon the success of income-based programs like LIHEAP and CARE, while helping to reach those who may be just outside the reach of the income-based requirements and definitions traditionally used for these programs.

In conversation with Minnesota Power, it is ECC's understanding that most residential arrears balances are with customers who do not have an income-eligibility designation. Depending on the time of year, this can be 85% or greater of residential arrears balances with no income-eligibility designation. While some of these customers may be income-eligible, they have not pursued options like self-declaration or LIHEAP. As such, it is ECC's view that an immediate and particularly impactful approach to reducing arrears lies with those customers who are non-income qualified. The proposal in the settlement seeks to strike that balance and is meant to be complementary to those income-qualified programs.

1.49 At the request of Energy CENTS Coalition, Minnesota Power and the Partners affirm their understanding that the budget billing provisions in Minnesota Statutes § 216B.098, subdivisions 2 and 3, refer to all residential customers and is not limited to those who are formally income-qualified. This is consistent with Minnesota Power's electric service regulations and practices.

Stipulation 1.49 falls within the category of acknowledgment of existing legal requirements. Minnesota Statutes § 216B.098, subdivisions 2 and 3 require an investor-owned utility to offer budget payment plans and arrearage forgiveness plans to customers that consider the financial circumstances of the customer seeking assistance. In recent proceedings before the Commission, parties have differed on whether payment plans should be limited only to customers who were formally income-qualified⁴ rather than allowing customers to self-declare hardship. While Minnesota Power currently complies with the broader interpretation of Minnesota Statutes § 216B.098, subdivisions 2 and 3, Stipulation 1.49 precludes the Company from invoking a different interpretation under new ownership.

1.64 The following metrics are tied to present requirements in Minnesota Power's annual Safety, Reliability, and Service Quality ("SRSQ") docket. Going forward, changes to Commission rules governing service quality or changes to the metrics in the SRSQ docket may also change these metrics, subject to the underperformance payments noted below. Each of the following are subject to reporting starting one year after the close of the Acquisition and enforcement beginning two years after the close of the Acquisition:

⁴ See Reply Comments of the Joint Commenters at 3. *In the Matter of Northern States Power Company d/b/a Xcel Energy's 2023 Annual Safety, Reliability, and Service Quality Report*, Docket No. E-002/M-24-27. June 24, 2024.

- a. If Minnesota Power's statewide service reliability fails to meet or exceed the Institute of Electrical and Electronics Engineers ("IEEE") second quartile benchmark for medium utilities, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- b. If one or more of Minnesota Power's work centers' reliability fails to meet or exceed the IEEE second quartile benchmark for small utilities, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- c. If the number of non-MN DIP service complaints by Minnesota Power customers forwarded to the utility from the Commission's Consumer Affairs Office exceeds fifty (50) in a given reporting year, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- d. If Minnesota Power fails to grant at least 99 percent of Cold Weather Rule protection requests which meet Minnesota statutory requirements, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- e. If Minnesota Power fails to restore at least 65 percent of involuntarily disconnected, as defined in the Minnesota Rule 7826.1500, residential customers to service within 24 hours, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- f. If Minnesota Power fails to answer at least 80 percent of customer calls received during business hours within 20 seconds, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- g. If Minnesota Power fails to ensure that at least 99.3 percent of customer invoices are accurate, Minnesota Power shall be required to make a \$250,000 underperformance payment.**
- h. Fifty percent of any under-performance payments assessed will be applied to customer bills during the following July billing cycle of a given performance year on an equal rate per kWh for each customer; the remaining fifty percent will be reinvested into options to address the cause of the underperformance. Any bill credit amounts not remitted by the end of the July billing cycle shall accrue interest beginning after the September billing cycle of the applicable year at a rate equal to that applied to Minnesota Power's customer deposits.**
- i. Underperformance payments shall not be recoverable from Minnesota Power ratepayers.**

While utilities in the State are required to submit Service Quality Reports to the Commission, Xcel Energy is currently the only utility that is subject to financial penalties if benchmarks are not met. This stipulation would apply a similar set of penalties to Minnesota Power's performance metrics. Throughout the record, Parties (including the ALJ) have posited that the Partners could divest from operations, maintenance and customer service to satisfy an elevated appetite for profit as private equity owners. The concessions the Department secured from ALLETE and the Partners in

Stipulation 1.64 equip the Commission with a regulatory tool with which to shape the Partners' cost-benefit analysis of any potential divestment. In the long run, deep divestment such as would be necessary to secure a meaningful impact on profits would likely lead to diminished customer service and system performance. If maintained properly, the underperformance penalty has the potential to diminish the gains the Partners might receive from such a divestment.

IV. Conclusion

The Energy CENTS Coalition has advocated for low-income utility customers for over 30 years. Over the course of that tenure, we have engaged in confrontational advocacy with utilities of nearly every ownership type. In 2002, we intervened before the Commission on the matter of consumer protection violations by the Beltrami Electric Cooperative against members of the Red Lake Nation.⁵ As recently as 2024, we lobbied before the Commission for a disconnection moratorium for CenterPoint Energy in response to a concerning rise in disconnections.⁶ In short, nothing inherent in the ownership structure of any of these entities precluded the need for vigilance and advocacy on behalf of low-income customers.

ECC does not deny nor discount that the profit expectations of the Partners exist in cross-purposes with the statutory mandate to provide affordable and reliable utility service to low-income customers. Nonetheless, it would appear from examining the historical record that such crosscurrents exist in every ownership type. To the extent that utilities have delivered affordable, equitable and reliable service to Minnesotans of every income, it is in large part because advocates have leveraged the enforcement mechanisms of the regulatory compact to ensure those outcomes. Vast swaths of the record in this docket are dedicated to speculative assessments of motive and intent, both positive and negative. Minnesota Power has stated that it chose the Partners based on alignment of values.⁷ Opponents of the acquisition have sought to use negotiations over the price of acquisition to undermine the credibility of any assertion of a values-based transaction.⁸

ECC's support of the Settlement – and the acquisition as a whole – is not rooted in blind faith in the intentions of the Partners. Rather, we see a perennial need for vigilance on behalf of low-income customers within the guardrails and protections of the regulatory compact. While there is nothing inherent within the transfer to ownership by private equity that will place the Company outside the Commission's watchful eye, the stipulations of the Settlement will further assure meaningful guardrails for MP customers under new ownership. For that reason, ECC recommends the Commission approve the Settlement.

⁵ See Docket No. E103/M-02-105

⁶ See Docket No. E, G-999/PR-23-2

⁷ Tr. Co at 11:18-12:21 (Cady)

⁸ ALJ Report at 17.

Sincerely,

George W Shardlow

George Shardlow, Executive Director

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Re: In the Matter of the Petition of Minnesota
Power for the Acquisition of ALLETE by Canada
Pension Plan Investment Board and Global
Infrastructure Partners

PUC Docket No. E015/PA-24-198

AFFIDAVIT OF SERVICE

George Shardlow certifies that, on August 4, 2025, he submitted, by electronic filing, a true and correct copy of the Comments of the Energy CENTS Coalition in the above-referenced matter, to the individuals on the attached service list.



George Shardlow



Kristen Syverud

Subscribed and sworn to me this 4th day of August, 2025.

Notary Public



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Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-198_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_24-198_Official
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, MB R3C 2P4 CANADA	Electronic Service	No	OFF_SL_24-198_Official
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouget, MN 55720	Electronic Service	No	OFF_SL_24-198_Official
Jess	McCullough	jmccullough@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-198_Official
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-198_Official
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_24-198_Official
Stephen	Melchionne	stephen.melchionne@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street, Ste. 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-198_Official
Debbie	Mencel	dmencel@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_24-198_Official
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Kimberly	Middendorf	kimberly.middendorf@state.mn.us	Office of Administrative Hearings	PO Box 64620 600 Robert St N Saint Paul, MN 55164-0620	Electronic Service	No	OFF_SL_24-198_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_24-198_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-198_Official
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_24-198_Official
Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Ave W Ste 515 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-198_Official
Travis	Murray	travis.murray@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota St Ste 1400 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-198_Official
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-198_Official
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-198_Official
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_24-198_Official

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Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_24-198_Official
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_24-198_Official
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_24-198_Official
Christine	Pham	christine.pham@state.mn.us	Public Utilities Commission	121 7th place E, suite 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-198_Official
Jeff	Pollock	jcp@jpollockinc.com	J. Pollock Inc.	Suite 335 12655 Olive Boulevard St. Louis, MO 63141	Electronic Service	No	OFF_SL_24-198_Official
Kevin	Pranis	kpranis@liunagro.com	Laborers' District Council of MN and ND	81 E Little Canada Road St. Paul, MN 55117	Electronic Service	No	OFF_SL_24-198_Official
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_24-198_Official
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_24-198_Official
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_24-198_Official

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Kristen	Vake	kvake@taconite.org	Iron Mining Association of Minnesota	1003 Discovery Drive Chisholm, MN 55719	Electronic Service	No	OFF_SL_24-198_Official
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Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_24-198_Official