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August 21, 2025

VIA E-FILING

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

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

Dear Mr. Bull:

Minnesota Power submits to the Minnesota Public Utilities Commission these Supplemental Comments providing plant startup condition data in Attachment 1.

Please contact me at (218) 591-4870 or avang@mnpower.com with any questions related to this matter.

Yours truly,

Ana Vang
Regulatory Compliance Specialist,
Senior

AMV:ah
Attach.

STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION

Pursuant to the Commission's revised Procedures for Handling Trade Secret and Privileged Data in furtherance of the intent of Minn. Stat. § 13.37 and Minn. Rule 7829.0500, Minnesota Power has designated portions of its attached compliance filing as Trade Secret.

Minnesota Power has excised material from this Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities compliance filing ("Report") because the format of the Report requires Minnesota Power to compile and provide information regarding its operating parameters, power supply, and fuel costs. This is highly confidential information relating to Company financial and planning information; Minnesota Power's competitors and vendors would acquire highly confidential commercial information about Minnesota Power if this information were publicly available. In addition, unauthorized disclosure of this information may violate certain federal securities regulations.

Minnesota Power follows strict internal procedures to maintain the secrecy of this information in order to capitalize on economic value of the information to Minnesota Power on behalf of its customers. Minnesota Power respectfully requests the opportunity to provide additional justification in the event of a challenge to the trade secret designation provided herein.

**PUBLIC DOCUMENT – NOT PUBLIC DATA HAS BEEN EXCISED
TRADE SECRET DATA EXCISED IN ITS ENTIRETY**

ATTACHMENT 1

STATE OF MINNESOTA)
)ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Amy M. Honkala of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 21st day of August, 2025, I electronically filed a true and correct copy of Minnesota Power's **Supplemental Comments in Docket No. E999/CI-19-704** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Amy M. Honkala