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April 30, 2020

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

RE: 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. E015/M-20-429

Dear Mr. Seuffert:

Subsequent to our initial filing in the above-referenced Docket (“the Petition Docket”), on April 24 2020, the Department of Commerce (“Department”), via email, asked Minnesota Power to provide in this Petition Docket information that was discussed by the parties in developing the proposal and/or was presented in the Company’s rate case docket. The purpose of providing this information is to further aid the Commission’s consideration of the Company’s Petition and ensure all relevant information is included in the record in this Petition Docket. To that end, Minnesota Power has provided additional information as attachments to this letter for the benefit of the Commission and Staff.

- **Attachment A** – Includes additional information about the increase to base energy rates and fuel adjustment clause (“FAC”) reduction impacts to different customer classes.
- **Attachment B** – Includes additional information on changes Minnesota Power made to the proposed FAC rates to incorporate the proposals made in the Petition Docket.
- **Attachment C** – Includes additional information on the allocations and assignment of asset-based margins in the Company’s rate case in Docket No. E015/GR-19-442 (“2019 Rate Case”) and in the current Minnesota Power proposal.
- **Attachment D** – Includes additional information on the margin credit amounts included in Minnesota Power’s 2019 Rate Case and the Company’s 2016 Rate Case in Docket No. E015/GR-16-664.
- **Attachment E** – Includes a description of the steps the Company proposes to take to implement its proposed resolution – specifically, to remove the interim rate line

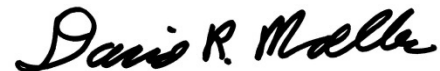
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item from customer bills; increase base energy rates individually for each class to reflect removing the Margin Credits from base rates; and place an estimated annualized Margin Credit (that will be trued-up to actual) into the FAC effective May 1, 2020.

Minnesota Power appreciates the Department's suggestions for supplementing the record with additional information the Commission may find useful in evaluating the Company's proposal.

If you have any questions regarding this filing, please contact me at (218) 723-3963 or dmoeller@allete.com.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, slightly slanted style.

David R. Moeller
*Senior Attorney and
Director of Regulatory Compliance*

DRM:th
Attach.

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 30th day of April, 2020, she served Minnesota Power's Letter in **Docket No. E015/M-20-429** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



Tiana Heger

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