

May 14, 2013

**PUBLIC DOCUMENT**

Burl W. Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
1217<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E015/M-12-920

Dear Dr. Haar:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce, Division of Energy Resources (DOC or the Department) in the following matter:

In the Matter of Minnesota Power's Petition for Approval of the Boswell Energy Center Unit 4 Emission Reduction Rider.

The petition was filed on March 7, 2013. The petitioner is:

Jodi L. Johnson  
Policy Manager  
Minnesota Power  
30 West Superior Street  
Duluth, Minnesota 55802

The Department recommends **approval** and is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE  
Rates Analyst

SLP/ja  
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

PUBLIC COMMENTS OF THE  
MINNESOTA DEPARTMENT OF COMMERCE  
DIVISION OF ENERGY RESOURCES

DOCKET NO. E015/M-12-920

**I. BACKGROUND INFORMATION**

On August 31, 2012, Minnesota Power (MP or the Company) filed its mercury emission reduction plan for its Boswell Energy Center Unit 4 generating unit (BEC4). The Company submitted its plan in compliance with Minn. Stat. §216B.6851. Specifically, MP proposes to retrofit BEC4 to reduce multiple pollutants, to comply with the Minnesota Mercury Emissions Reduction Act (MERA), and the Environmental Pollution Agency's Mercury and Air Toxics Rule (MATS).

On March 1, 2013, the Minnesota Pollution Control Agency (MPCA) issued its report on MP's BEC4 Environmental Improvement Plan.

On March 7, 2013, MP filed its request for approval of the BEC4 Rider.

**II. SUMMARY OF THE FILING**

**A. SUMMARY OF THE BEC4 PROJECT**

BEC4 is a 635 MW coal fired generating unit with 585 MW net operating capability in operation since 1980 and located in Cohasset, Minnesota. MP proposes environmental retrofits aimed at reducing mercury (Hg), particulate matter (PM), and sulfur dioxide (SO<sub>2</sub>). Specifically, the Company proposes to add a circulating dry scrubber, fabric filter and powdered activated carbon injection system to remove Hg, SO<sub>2</sub>, and PM. BEC4 is jointly owned by MP and WPPI Energy.<sup>1</sup>

---

<sup>1</sup> WPPI Energy is the entity's full name.

Under MP's proposal, WPPI Energy will pay a proportionate share of the required capital and operation and maintenance (O&M) costs associated with the BEC4 Project, reflecting its 20 percent ownership share.

MP reports that, when it began operation in 1980, BEC4 operated with first-generation low NO<sub>x</sub> burners and wet sprayer system. Additional NO<sub>x</sub> controls were installed in 2008. Currently, the Company has a wet scrubber for SO<sub>2</sub> control. MP proposes to install a circulating dry scrubber, and a powdered activated carbon injection system with fabric filter for the purpose of controlling SO<sub>2</sub>, PM and mercury. A summary of the expected annual reductions in emissions is shown in Table 1, below:

**Table 1: Summary of Expected Emissions Reductions from BEC4 Project**

	<b>Mercury (lbs/year)</b>	<b>Particulates (tons/year)</b>	<b>Sulfur Dioxide (tons/year)</b>
Before BEC4 Project	228	1,275	1,061
After BEC4 Project	26	259	647
Emissions Reduction	202	1,016	414
Percent Reduction	89%	80%	39%

The Company plans to begin construction in mid-2013 with in-service expected by year-end 2015. Because of the large number of projected generation outages anticipated to occur in the next several years to meet compliance deadlines of the Environmental Protection Agency (EPA), MP states that it has proactively requested an outage to complete the circulating dry scrubber (CDS) transition for October – November 2015.

MP estimates total capital costs for the BEC4 Project of approximately \$350 million, and annual operating and maintenance costs of approximately \$12.5 million. Table 2 summarizes BEC4 project costs.

**Table 2: Projected Costs of BEC4 Project – MP Share**

	<b>Capital (000's)</b>	<b>Annual Incremental O&amp;M (000's)</b>
NID*/Fabric Filter	\$251,800	\$9,100
PAC System	\$9,200	\$300
Ductwork	\$34,900	\$-
Ash Handling System	<u>\$53,900</u>	<u>\$3,100</u>
Total	\$349,800	\$12,500

\* NID stands for Novel Integrated Desulfurization, a form of CDS technology.

*B. SUMMARY OF THE MPCA'S REVIEW OF THE BEC4 ENVIRONMENTAL PLAN*

Minn. Stat. §216B.684 requires the MPCA to evaluate a mercury emission reduction plan filed under Minn. Stat. §216B.682 and §216B.6851, and to assess the following:

- 1) Whether the proposed mercury reduction project meets the requirements of section 216B.682 or 216B.6851, as applicable;
- 2) The environmental and public health benefits of each option proposed or considered by the utility, including benefits associated with reductions in pollutants other than mercury;
- 3) the technical feasibility and cost-effectiveness of technologies proposed or considered by the utility for achieving mercury emissions reduction; and
- 4) Advise the Minnesota Public Utilities Commission of the appropriateness of the utility's plan.

Minn. Stat. §216B.686, subd. 3 requires similar MPCA analysis of multi-pollution reduction plans.

On March 1, 2013, the MPCA submitted its review of the BEC4 project in which it concluded:

- The total measurable benefits of SO<sub>2</sub> and PM reductions did not exceed the total measurable costs. Specifically, MPCA estimated the annual benefits from SO<sub>2</sub> and PM reductions to range from \$15 to \$50 million, while MP projects the annualized costs of the BEC4 plan to be nearly \$66.8 million.
- However, MPCA indicates limited confidence in the calculation of annual benefits related to mercury reductions due to uncertainty in important aspects of the benefits assessment.
- MP's plan to use halogenated carbon to control mercury to achieve 90 percent control is cost-effective.
- MP's plan to eliminate wet flue gas desulfurization will significantly reduce expected future compliance costs related to federal regulations of coal combustion residuals.
- The project is appropriate for accomplishing the objectives of reducing emissions of mercury and other pollutants under Minn. Stat. §§ 216B.68 to 216B.688, bringing the Boswell 4 unit into compliance with federal air emission standards, resolving environmental violations and avoiding additional regulatory requirements related to coal combustion residuals.

### III. DEPARTMENT ANALYSIS

#### A. COMPLIANCE WITH THE MERCURY STATUTE

MP filed its proposed mercury plan for BEC4 under Minn. Stat. §§216B.6851, and 216B.686 (MERA). Minn Stat. §216B.6851 requires utilities to file a mercury reduction plan with the goal of achieving a 90 percent reduction in mercury emissions by December 31, 2018. Minn. Stat. §216B.686 allows utilities to submit a multi-pollutant emissions reduction plan. MP's proposed BEC4 Project focuses on reducing Hg, SO<sub>2</sub> and PM at its BEC4 generating unit. MP's proposed BEC4 Rider was filed under Minn. Stat. §216B.683, §216B.686 and §216B.1692, subd. 3 which allow utilities to file for approval of an emissions-reduction rate rider.

The Company proposes to install a semi-dry flue gas desulfurization system, fabric filter, and a powdered activated carbon injection system (PAC) to meet the requirements of Minn Stat. §216B.6851, as well as the EPA's MATS, and other federal rules that target emissions of SO<sub>2</sub> and particulates.

In its analysis of the cost-effectiveness of MP's proposal, the MPCA evaluated the use of halogenated and non-halogenated carbon to remove mercury. MPCA estimated that MP's proposal to use a halogenated carbon would cost \$17,391 per pound removed compared with \$23,076 per pound removed using a non-halogenated carbon. The higher cost per pound removed using non-halogenated carbon is due to lower effectiveness of non-halogenated carbon. The Department concurs with the MPCA that "Minnesota Power's plan to use halogenated carbon to control mercury to achieve 90 percent control is cost-effective" (page 3 of MPCA's March 1, 2013 report).

The MPCA analysis also found that the costs of the BEC4 project outweighed the benefits of reductions in SO<sub>2</sub> and PM. However, unlike the benefits of SO<sub>2</sub> and PM reduction, which can be valued quantitatively, the ability to value the benefits of mercury reduction quantitatively is limited; therefore the MPCA provides a qualitative review of potential benefit valuation. MP's BEC4 plan is not expected to reduce NO<sub>x</sub> emissions because the Company completed a retrofit in 2010 that produced a better than 50 percent reduction in NO<sub>x</sub> emissions.

While the MPCA states that the costs of SO<sub>2</sub> and PM reductions may outweigh the benefits, MPCA also acknowledges that a quantitative analysis on the costs and benefits of emissions reductions is limited only to SO<sub>2</sub> and PM, with a qualitative valuation of mercury reduction benefits. As noted by the MPCA:

...sulfur dioxide reductions with the project are smaller than MP's previous project (Boswell 3) under Minn. Stat. §216B.6851 because of the current presence of good SO<sub>2</sub> controls. The Boswell unit 4 current air pollution control devices cannot meet the federal MATS emission limits for mercury or particulate matter capture. In addition the options evaluated by MP show that MP

has selected a multi-pollutant control strategy that will achieve emission levels of SO<sub>2</sub> and particulate matter that are well beyond federal standards control requirement. (*MPCA Report, p. 4*)

Thus, based on MPCA's report and EPA's requirement that MP must provide the environmental upgrades to Boswell 4, the Department concludes that MP's BEC4 project is reasonable for meeting the requirements of MERA and the federal MATS rule and recommends that the Commission find the project to be in the public interest.

In addition, the Department examined this project in light of the results of the Department's analysis of MP's baseload diversification study (Docket No. E002/RP-09-1088). As indicated on pages 23 of the Department's May 7, 2012 comments on MP's Baseload Diversification study, retiring Boswell 4 early would not be a cost-effective option under any scenario or contingency:

The Department removed the retirement unit for Boswell 4. MP had built into its modeling a generic resource that would retire Boswell 4 if selected as part of the least cost plan. MP's Baseload Study indicates that retiring Boswell 4, regardless of the level of EPA regulation would result in substantial costs to MP's ratepayers. Since Boswell 4 will be subject to costs imposed by EPA regulation, it is reasonable for Boswell 4 to be included by MP in the retirement analysis. However, initial Department analysis determined that, at the expected level of environmental compliance costs, retiring Boswell 4 is not a cost-effective option. Therefore, the Department removed this generic retirement as an option in a separate scenario.<sup>1</sup>

The Department tested the cost-effectiveness of retiring Boswell 4 using high externality costs, including carbon costs beginning in 2012,<sup>2</sup> along with contingencies such as high and low capital cost assumptions, high and low natural gas prices, high and low coal prices, high and low wind prices and high and low energy and demand forecasts. The costs used for environmental upgrade were higher than the \$350 million proposed in the current filing. Even under these extreme assumptions, retiring Boswell 4 early would cost Minnesota Power's customers more than keeping Boswell 4 in operation. In addition, retiring Boswell 4 early would require continued operation of MP's marginal coal plants, to ensure that MP's customers have sufficient capacity and reliable service.

---

<sup>2</sup> At this time there is no externality value for mercury. See *In the Matter of the Investigation into Environmental and Socioeconomic Costs* under Minn. Stat. §216B.2422, subd. 3 Order Deferring Further Action on Quantifying Mercury and Particulates and Maintaining Purchased Power Policy, Docket No. E999/CI-00-1636, October 5, 2011.

As a result, the Department concludes that, even with the environmental upgrades, BEC4 is a least cost resource in MP's generation fleet. Further, since the proposed BEC4 project is a cost-effective way to achieve various emission reductions, the Department concludes that MP's proposed BEC4 project should be approved.

**B. *EPA NOTICE OF VIOLATION***

In its 2011 Mercury Emission Reduction Plan Report, MP stated that it had received a Notice of Violation (NOV) from the EPA asserting violations of the New Source Review requirements of the Clean Air Act at the Boswell Energy Center (BEC) Units 1-4. To understand the impact the NOV has on the BEC4 Project, the Department requested that the Company identify each violation attributed to BEC4 and its resolution. According to MP:

**[TRADE SECRET DATA HAS BEEN EXCISED]**  
(MP response to DOC IR #1 – Trade Secret Attachment A)

MP states that it is in discussions with the EPA regarding resolution of the issues raised in the NOV, but that no resolution has been reached yet. (MP response to DOC IR #1).

With respect to any impact the NOV has on the BEC4 Project, the Company states:

**[TRADE SECRET DATA HS BEEN EXCISED]**  
(MP Response to DOC IR No. 6 – Trade Secret Attachment B)

MP further indicates that the estimated emissions reductions resulting from its BEC4 Project were based on vendor emission guarantees. (MP Response to DOC IR No. 6 – Attachment B) Finally, MP indicates that it is not seeking recovery of costs associated with the EPA's NOV, including attorney and expert fees paid to date, through its BEC4 Rider. (MP Response to DOC IR No.2 – Attachment C)

The Department recognizes that MP may be precluded from fully disclosing the nature of its ongoing settlement discussions with the EPA. Nonetheless, the Department believes the Company should be directed to keep the Commission apprised, to the best of its ability, of the status of its NOV. Additionally, the Department recommends the Company identify and explain any and all costs associated with the NOV for which it seeks recovery in its future BEC4 rate adjustment filings, rate cases, or any other rate proceeding.

**C. *RIDER RECOVERY***

Minn. Stat. §216B.1692, subd. 3 allows a public utility to "petition the commission for approval of an emissions-reduction rider to recover the costs of a qualifying emissions-reduction project outside of a general rate case proceeding under section 216B.16."

*1. Revenue Requirement*

MP estimates its total capital costs for the BEC4 Project at \$350 million and annual operations and maintenance costs of approximately \$12.5 million. For the twelve month period ended June 30, 2014, the Company projects a revenue requirement for the Minnesota jurisdiction of \$11.4 million.

MP indicates that it will record capital expenditures related to BEC4 in a construction work-in-progress account (FERC Account 107) (CWIP). The Company requests a current return on CWIP beginning when cost recovery under the BEC4 Rider is approved by the Commission. In addition, the Company states that it will calculate Allowance for Funds Used During Construction (AFUDC) for the project and record an offsetting regulatory liability. The Company calculated its revenue requirement for upcoming year using its pre-tax rate of return, grossed up for income taxes, from its last rate case (E015/GR-09-1151) of 12.5 percent. The Department concludes that MP's proposed revenue requirement calculations are reasonable.

*2. Cost Allocation*

MP offered three alternative methods for allocating the revenue requirement to its customer classes: 1) Peak & Average Demand method (D-01/P&A); 2) Energy method (E-01/E8760); and 3) Coincident Peak Demand method (D-01/CP).

MP recommends that the Commission adopt the Peak & Average Demand method. The Department addresses each method below:

*a) Peak & Average Demand Method (D-01/P&A)*

Under the P&A method, MP would allocate the revenue requirement between its wholesale and retail jurisdictions based on the Power Supply Production Demand allocator (D-01), and to allocate the retail revenue requirement among MP's retail classes using the P&A demand allocator from the Company's last rate case (Docket No. E015/GR-09-1151). MP states that the P&A methodology would be consistent with how BEC4 Project costs would be treated when rolled into base rates in a future rate case, and is consistent with the methodology used to classify and allocate the costs of the Boswell 3 Environmental project into base rates in its last rate case. Because the BEC4 project does not result in increased energy production and consists primarily of fixed costs, MP states that it is appropriate to allocate costs based primarily on demand.

*b) Energy Method (E01/E8760)*

The Energy Method allocates the revenue requirement between the wholesale and retail jurisdictions using the Power Supply Production Energy (E-01 allocator), and among the retail customer classes using the E8760 allocator. The Energy method is the methodology approved by the Commission for use in MP's Boswell 3 Environmental Plan (Docket No. E015/M-06-1501 and Docket No. E015/M-07-1430).



*c) Coincident Peak Demand Method (D-01/CP)*

Under the Coincident Peak Demand method (CP), the Company would allocate revenues between jurisdictions using the Power Supply Production Demand (D-01) allocator, and allocate the revenue requirement among classes based on each class's proportional contribution to the coincident peak.

A comparison of estimated customer rate impacts for 2014 is shown in Table 1, below.

**Table 1: Comparison of Rate Impacts of Cost Allocation Methodologies**

	<b>P&amp;A Method</b>	<b>Energy Method</b>	<b>CP Demand Method</b>
<b>Residential</b>			
Increase (¢/kWh)	0.0141	0.0148	0.174
% Increase	1.57%	1.65%	1.94%
Avg. Impact (\$/mo)	\$1.18	\$1.24	\$1.46
<b>General Service</b>			
Increase (¢/kWh)	0.134	0.141	0.162
% Increase	1.50%	1.57%	1.81%
Avg. Impact (\$/mo)	\$3.74	\$3.94	\$4.52
<b>Large Light &amp; Power</b>			
Increase (¢/kWh)	0.124	0.122	0.145
% Increase	1.76%	1.73%	2.06%
Avg. Impact (\$/mo)	\$305.19	\$300.26	\$356.87
<b>Large Power</b>			
Increase (¢/kWh)	0.117	0.120	0.103
% Increase	2.24%	2.30%	1.97%
Avg. Impact (\$/mo)	\$66,031	\$67,724	\$58,130
<b>Municipal Pumping</b>			
Increase (¢/kWh)	0.169	0.170	0.180
% Increase	2.08%	2.09%	2.22%
Avg. Impact (\$/mo)	\$28.35	\$28.52	\$30.20
<b>Lighting</b>			
Increase (¢/kWh)	0.15	0.106	0.227
% Increase	1.02%	0.72%	1.55%
Avg. Impact (\$/mo)	\$0.28	\$0.20	\$0.43

With respect to rate design, MP states that it will use a rate design for its Large Power (LP) customer class that is consistent with its existing base rate design and previous Rider recovery methodology. MP proposes to recover rates for its LP customers through both demand and energy charges using the LP class' demand and energy revenue split of approximately 60 percent demand and 40 percent energy. The revenue requirement for the remaining customer classes would be recovered through an energy charge.

The Department has reviewed MP's proposal and recommends approval of the P&A method for allocating the revenue requirement to the customer classes, as well as MP's proposed rate design for its LP and other customer classes. While revenue requirements have typically been allocated to the various customer classes on an energy basis, the P&A methodology is reasonable and consistent with the methodology used to allocate costs in base rates. MP's proposal to use a demand and energy charge for its LP customers and an energy charge for all other customer classes is consistent with the rate design used in other Rider filings.

MP proposes to make annual rate factor adjustment filings to reflect the upcoming year's revenue requirement, as well as actual costs and revenues reflected in the tracker balance. As indicated above, the Department recommends that the Company include an update to the Commission on discussions with the EPA to resolve the NOV, and to identify and explain any costs related to the NOV for which it seeks recovery through the BEC4 Rider in any future annual rate factor adjustment filings or other rate proceeding.

#### **IV. SUMMARY OF DEPARTMENT RECOMMENDATIONS**

The Department recommends that the Commission:

- Approve Minnesota Power's Boswell 4 Emissions Reduction Plan,
- Approve Minnesota Power's request for a Boswell 4 Rider,
- Direct the Company to make annual rate factor adjustment filings,
- Direct the Company to include an update on its discussions with the EPA to resolve the NOV, and identify and explain any costs related to the NOV included in its rate factor adjustment filings or other rate proceeding.

/ja

---

<sup>i</sup> In the Matter of Minnesota Power's Baseload Diversification Study Compliance Report, Comments of the Minnesota Department of Commerce, Division of Energy Resources, May 7, 2012, p. 23, Docket No. E015/RP-09-1088.

# Attachment A - Public

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

**Utility Information Request**

Docket Number: E015/M-12-920

Date of Request: March 22, 2013

Requested From: Jodi Johnson / Minnesota Power

Response Due: April 3, 2013

Analyst Requesting Information: Susan Peirce

Type of Inquiry: ☐ Financial ☐ Rate of Return ☐ Rate Design  
☐ Engineering ☐ Forecasting ☐ Conservation  
☐ Cost of Service ☐ CIP ☐ Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
1	In its 2011 Mercury Emission Reduction Plan Report, MP stated that it had received a Notice of Violation (NOV) from the EPA asserting violations of the New Source Review requirements of the Clean Air Act at Boswell Energy Center (BEC) Units 1-4. Please identify each violation attributed to BEC4 and the resolution of each such violation.

**Minnesota Power Response:**

**[TRADE SECRET BEGINS]**

Response by: Lyssa Supinski

List sources of information:

Title: Senior Attorney

Department: Legal Services

Telephone: (218) 723-3982

**TRADE SECRET ENDSI**

Minnesota Power disagrees with the allegations in the NOV. Minnesota Power believes that the items identified in the NOV were in full compliance with the Clean Air Act and applicable permits.

Minnesota Power is engaged in discussions with EPA regarding resolution of these matters, but is unable to predict the outcome of these discussions. No resolution of these matters has been reached.

---

Response by: Lyssa Supinski

Title: Senior Attorney

Department: Legal Services

Telephone: (218) 723-3982

List sources of information:

---

---

---

# Attachment B - Public

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

**Utility Information Request**

Docket Number: E015/M-12-920

Date of Request: March 22, 2013

Requested From: Jodi Johnson / Minnesota Power

Response Due: April 3, 2013

Analyst Requesting Information: Susan Peirce

Type of Inquiry: ☐ Financial ☐ Rate of Return ☐ Rate Design  
☐ Engineering ☐ Forecasting ☐ Conservation  
☐ Cost of Service ☐ CIP ☐ Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
6	Has the NOV effected the determination of estimated emissions levels under the BEC4 Project? Please provide an explanation for the basis for all estimated emissions levels (SO <sub>2</sub> , PM, NO <sub>x</sub> , Hg) under the BEC4 Project.

**Minnesota Power Response:**

**[TRADE SECRET BEGINS]**

**SECRET ENDS]**

**TRADE**

Response by: Lyssa Supinski

List sources of information:

Title: Senior Attorney

Department: Legal Services

Telephone: (218) 723-3982

The basis for the estimated post-project emission levels of SO<sub>2</sub>, PM, and Hg in the August 31, 2012 Petition are the vendor emissions guarantees for SO<sub>2</sub>, PM, and Hg. NO<sub>x</sub> emission levels are unaffected by the BEC4 project and the August 31, 2012 Petition does not estimate NO<sub>x</sub> emission levels.

FI

---

Response by: Lyssa Supinski

Title: Senior Attorney

Department: Legal Services

Telephone: (218) 723-3982

List sources of information:

---

---

---

# Attachment C

**State of Minnesota**  
**DEPARTMENT OF COMMERCE**  
**DIVISION OF ENERGY RESOURCES**

**Utility Information Request**

Docket Number: E015/M-12-920

Date of Request: March 22, 2013

Requested From: Jodi Johnson / Minnesota Power

Response Due: April 3, 2013

Analyst Requesting Information: Susan Peirce

Type of Inquiry: ☐ Financial ☐ Rate of Return ☐ Rate Design  
☐ Engineering ☐ Forecasting ☐ Conservation  
☐ Cost of Service ☐ CIP ☐ Other:

*If you feel your responses are trade secret or privileged, please indicate this on your response.*

Request No.	
2	Identify any and all costs associated with the EPA's NOV. Does the Company expect to recover any of these costs through its BEC4 Rider? If so, please provide the amount of costs and full justification for each such recovery.

**Minnesota Power Response:**

Minnesota Power has paid attorney and expert fees in connection with the NOV.  
Minnesota Power is not seeking recovery of any of these fees through its BEC4 Rider.

Minnesota Power is engaged in discussions with EPA regarding resolution of the NOV,  
but is unable to predict the outcome of those discussions and therefore cannot predict associated costs.

Response by: Lyssa Supinski

List sources of information:

Title: Senior Attorney

Department: Legal Services

Telephone: (218) 723-3982

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Public Comments**

**Docket No. E015/M-12-920**

Dated this **14<sup>th</sup>** of **May, 2013**

**/s/Sharon Ferguson**



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_12-920_Official
Gary	Anderson	N/A	Stora Enso	Duluth Paper Mill 100 N. Central Avenue Duluth, MN 55807	Paper Service	No	OFF_SL_12-920_Official
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	Yes	OFF_SL_12-920_Official
Richard	Baxendale		Boise Cascade Corporation	926 Harvard Avenue East  Seattle, WA 98102	Paper Service	No	OFF_SL_12-920_Official
John	Berklich		Hibbing Taconite Company	PO Box 589  Hibbing, MN 55746	Paper Service	No	OFF_SL_12-920_Official
William A.	Blazar	bblazar@mncchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-920_Official
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_12-920_Official
Greg	Chandler	greg.chandler@upm-kymmene.com	UPM Blandin Paper	115 SW First Street  Grand Rapids, MN 55744	Paper Service	No	OFF_SL_12-920_Official
Linda	Chavez	linda.chavez@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 55101-2198	Electronic Service	No	OFF_SL_12-920_Official
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Paper Service	No	OFF_SL_12-920_Official
Derick O.	Dahlen		Avant Energy Services	Suite 300 200 South Sixth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-920_Official

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_12-920_Official
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_12-920_Official
Leah	Foushee		North American Water Office	P. O. Box 174  Lake Elmo, MN 55042	Paper Service	No	OFF_SL_12-920_Official
Darla	Frink	N/A	City of Cohasset	305 Northwest 1st Avenue  Cohasset, MN 55721	Paper Service	No	OFF_SL_12-920_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Paper Service	No	OFF_SL_12-920_Official
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_12-920_Official
Darrell	Gerber		Clean Water Action Alliance of Minnesota	308 Hennepin Ave. E.  Minneapolis, MN 55414	Paper Service	No	OFF_SL_12-920_Official
Benjamin	Gerber	bgerber@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	No	OFF_SL_12-920_Official
Elizabeth	Goodpaster	bgoodpaster@mncenter.org	MN Center for Environmental Advocacy	Suite 206 26 East Exchange Street St. Paul, MN 551011667	Paper Service	No	OFF_SL_12-920_Official
Christopher	Greenman	ChristopherGreenman@excelsiorenergy.com	Excelsior Energy	225 S 6th St Ste 1730  Minneapolis, MN 55402-4638	Paper Service	No	OFF_SL_12-920_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_12-920_Official
Janice	Hall	board.secretary@co.cook.mn.us	Cook County Board of Commissioners	411 W 2nd St Court House Grand Marais, MN 55604-2307	Paper Service	No	OFF_SL_12-920_Official
Samuel	Hanson		Briggs And Morgan, P.A.	2200 IDS CenterE 80 South Eighth Street Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-920_Official
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_12-920_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	OFF_SL_12-920_Official
Margaret	Hodnik	mhodnik@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_12-920_Official
Anne	Jackson	anne.jackson@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St Paul, MN 55115	Electronic Service	No	OFF_SL_12-920_Official
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417  Mountain Iron, MN 55768	Paper Service	No	OFF_SL_12-920_Official
Eric	Jensen	ejensen@iwla.org	Izaak Walton League of America	Suite 202 1619 Dayton Avenue St. Paul, MN 55104	Electronic Service	No	OFF_SL_12-920_Official
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	No	OFF_SL_12-920_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jodi	Johnson	jljohnson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802-2010	Electronic Service	No	OFF_SL_12-920_Official
Erin	Jordahl-Redlin		Clean Water Action Alliance Of MN	308 East Hennepin Avenue  Minneapolis, MN 55414	Paper Service	No	OFF_SL_12-920_Official
John A.	Knapp	jknapp@winthrop.com	Winthrop & Weinstine	Suite 3500 225 South Sixth Street Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-920_Official
Gerald P.	Kohanski	gpkohanski@cleveland-cliffs.com	Cleveland-Cliffs Inc.	Suite 1500 1100 Superior Avenue Cleveland, OH 441142518	Paper Service	No	OFF_SL_12-920_Official
Irene	Koski	irene.koski@co.itasca.mn.us	Itasca County	123 NE Fourth Street  Grand Rapids, MN 557442600	Paper Service	No	OFF_SL_12-920_Official
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_12-920_Official
James D.	Larson		Avant Energy Services	200 S 6th St Ste 300  Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-920_Official
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	Yes	OFF_SL_12-920_Official
Jay	Lofgren	jaylofgren@boisepaper.com	Boise, Inc.	Paper Division 400 - 2nd Street International Falls, MN 56649	Paper Service	No	OFF_SL_12-920_Official
Paula	Maccabee	Pmaccabee@visi.com	Just Change Law Offices	1961 Selby Avenue  St. Paul, MN 55104	Paper Service	No	OFF_SL_12-920_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Paper Service	No	OFF_SL_12-920_Official
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_12-920_Official
Robert	McCarron		MN Pollution Control Agency	520 Lafayette Road North  St. Paul, MN 551554194	Paper Service	No	OFF_SL_12-920_Official
Angie	Miller		Community Action Duluth	19 N. 21 Avenue West  Duluth, MN 55806	Paper Service	No	OFF_SL_12-920_Official
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-920_Official
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-920_Official
Jenny L.	Myers	jmyers@iwla.org	Izaak Walton League of America	1619 Dayton Ave. Suite 202 St. Paul, MN 55104	Paper Service	No	OFF_SL_12-920_Official
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-920_Official
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_12-920_Official
Thomas L.	Osteraas	tomosteraas@excelsiorenergy.com	Excelsior Energy	225 S 6th St Ste 1730  Minneapolis, MN 55402	Paper Service	No	OFF_SL_12-920_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kent	Ragsdale	kentragsdale@alliantenergy.com	Alliant Energy-Interstate Power and Light Company	P.O. Box 351 200 First Street, SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_12-920_Official
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028  Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_12-920_Official
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street  Duluth, MN 55806	Electronic Service	No	OFF_SL_12-920_Official
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_12-920_Official
William	Schmidt		USG Interiors, Inc.	35 Arch Street  Cloquet, MN 55720	Paper Service	No	OFF_SL_12-920_Official
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	15347 Boulder Pointe Road  Eden Prairie, MN 55347	Electronic Service	No	OFF_SL_12-920_Official
Joe	Scipioni		PolyMet Mining, Inc.	P.O. Box 475 County Highway 666 Hoyt Lakes, MN 55750	Paper Service	No	OFF_SL_12-920_Official
Jeremy	Smolich		Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	OFF_SL_12-920_Official
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_12-920_Official
John Linc	Stine	john.stine@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd  Saint Paul, MN 55155	Electronic Service	No	OFF_SL_12-920_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_12-920_Official
SaGonna	Thompson	Regulatory.Records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7  Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-920_Official
David	Thornton	J.David.Thornton@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-920_Official
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave  Minneapolis, MN 55406	Electronic Service	No	OFF_SL_12-920_Official
Laurance R.	Waldoch		Lindquist & Vennum	4200 IDS Center 80 South 8th Street Minneapolis, MN 554022274	Paper Service	No	OFF_SL_12-920_Official
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	1st National Bank Building 332 Minnesota St Ste W1260 St. Paul, MN 55101	Paper Service	No	OFF_SL_12-920_Official
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue  Virginia, MN 55792	Paper Service	No	OFF_SL_12-920_Official