

April 15, 2026

PUBLIC DOCUMENT

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E015/AA-24-64

Dear Ms. Bergman,

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Petition of Minnesota Power for Approval of the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2025.

The Petition was filed by Minnesota Power on March 3, 2026.

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

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

JT/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E015/AA-24-64

I. INTRODUCTION

On March 3, 2026, Minnesota Power (MP or the Company) filed its Annual Automatic Adjustment 2025 True-Up Report (Petition) of the Company’s Fuel and Purchased Energy (FPE) rates for calendar year 2025 with the Minnesota Public Utilities Commission (Commission). The Company submitted its [Petition](#)¹ pursuant to the Commission’s [Order](#)² and the applicable reporting requirements provided for in Minn. R. 7825.2800 to 7825.2840. MP requests the Commission approve the 2025 true-up for the Company’s Forecasted Fuel and Purchased Energy rates and find the Company’s filing complies with the applicable reporting requirements.

On November 8, 2024, the Commission authorized MP to implement its 2025 FPE forecast based on forecasted sales of 8,997,900 MWh and forecasted fuel costs of \$271,596,420.³

In the current Petition, the Company’s actual 2025 sales were 8,192,436 (8.95% lower than initially forecasted) and actual fuel costs were \$252,456,333 (5.22% lower than initially forecasted, and 7.05% lower than the revised forecast).⁴ MP proposes a net true-up charge of approximately \$3.5 million to be collected over a 12-month period beginning September 1, 2026, following Commission approval.⁵

II. PROCEDURAL BACKGROUND

May 1, 2024	Minnesota Power filed a petition requesting approval of its 2025 annual automatic adjustment forecasted fuel and purchased energy rates.
November 8, 2024	The Commission filed an order approving Minnesota Power’s petition.
January 30, 2025	Minnesota Power filed a compliance filing requesting approval of an adjustment to rates as a result of the settlement agreement in Docket No. E015/GR-23-155, as well as a revised 2025 FCA Forecast calculation.

¹ Link to public version of Petition.

² *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Minnesota Public Utilities Commission, Order, June 12, 2019, Docket No. E999/CI-03-802, (eDockets) [20196-153514-01](#).

³ *In the Matter of Minnesota Power’s Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2025 through December 2025*, Minnesota Public Utilities Commission, Order, November 8, 2024, Docket No. E015/AA-24-64, (eDockets) [202411-211817-01](#). (Note: Based on the Commission’s November 25, 2024 [Order](#) in Docket No. E-15/GR-23-155, the Company is now allowed to request a true-up of its Reagent expenses and NOx charges in the instant Petition, resulting in an updated forecasted total cost of fuel of \$271,596,420, compared to the \$266,372,540 original forecasted total cost of fuel. See Order at 6, settlement item 56. Also see MP’s January 30, 2025 [Compliance Filing](#) for the revised 2025 FCA Forecast).

⁴ Petition, at 22-23.

⁵ Petition, at 2.

March 3, 2026 Minnesota Power filed a Petition requesting approval of its 2025 annual automatic adjustment true-up report of forecasted fuel and purchased energy rates.

III. DEPARTMENT ANALYSIS

The Department reviewed the Company's Petition to determine (1) whether the Company's actual 2025 energy costs were reasonable and prudent, (2) whether the Company correctly calculated the 2025 true-up for its FPE rates, and (3) whether the Petition complies with the reporting requirements set forth in the applicable Minnesota Rules and Commission Orders. MP's FPE and Fuel Clause Adjustment (FCA) refer to essentially the same cost recovery mechanism and are used interchangeably throughout the instant comments.

A. SUMMARY OF RECENT FUEL CLAUSE ADJUSTMENT REFORM

[Minnesota Statutes § 216B.16](#), subd. 7 authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their FCA rates monthly to reflect, on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation to explore possible changes to the FCA and invited stakeholders to comment on the purpose, structure, rationale, and relevance of the FCA. The Commission's *Order* approved certain reforms to the FCA mechanism.⁶ Specifically, Order Point 1 of the *Order* approved the Department's FCA reform proposals as follows:

- a. The Commission will set recovery of the electric utility's fuel, power purchase agreement, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.
- b. Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- c. The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- d. Each electric utility will be allowed to track any changes in \$/MWh fuel clause costs that occur over the year and there will be no carrying charge on the tracker.

⁶ *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Minnesota Public Utilities Commission, Order, December 19, 2017, Docket No. E999/CI-03-802, (eDockets) [202311-200374-01](#).

- e. Annually, each electric utility will report actual \$/MWh fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year. The emphasis is on the overall average actual \$/MWh even if actual monthly costs vary from expected monthly costs.
- f. Each electric utility will refund any over-collections and show the prudence of costs before recovering under-collections. If annual revenues collected are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs, the utility must show why it is reasonable to charge the higher costs (under collections) to ratepayers through a true-up mechanism.

The Commission's December 12, 2018 [Order](#) modified the FCA reform previously approved in the Commission's December 19, 2017 Order in the same docket. In particular, the December 12, 2018 Order:

- Established a January 1, 2020 implementation date for the FCA reform.
- Required the utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year following the relevant calendar year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.
- Granted the relevant utilities a variance to Minnesota Rule 7825.2600, subpart 3, which requires the FCA to be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base rates annually.

The Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03-802 provided additional details to finalize the FCA reform. Specifically, the June 12, 2019 Order approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these Rules.
- A procedural schedule, as shown in Appendix A of the *Order*.
- A threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.

- Tracking under or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.
- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019 [joint comments](#)⁷ in Docket No. E999/CI-03-802 and the requirement that the annual true-up filings include a complete analysis and discussion of the consequences of self-commitment and self-scheduling of their generators, including the annual difference between production costs and corresponding prevailing market prices.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019 joint comments⁸ in Docket No. E999/CI-03-802.

The current Petition provides the true-up between the Company's forecasted fuel and purchased power cost recovery through its FPE and the actual corresponding fuel and purchased power costs incurred by MP for the period of January 1 through December 31, 2025.

B. PURPOSE OF MINNESOTA POWER'S PETITION

In its Petition, MP: (1) demonstrated the Company's fuel and purchased power costs for 2025 were reasonable and prudent,⁹ (2) requested Commission approval for a true-up of the under-recovered \$3.5 million in fuel costs to be collected over a 12-month period beginning September 1, 2026, after Commission approval,¹⁰ and (3) requested Commission approval of the FCA true-up compliance reporting required by Minn. R. 7825.2800 – 7825.2840 and applicable Commission orders.¹¹ The Department discusses each of these three areas in the following sections.

C. PRUDENCY AND REASONABLENESS OF MINNESOTA POWER'S ACTUAL 2025 FUEL AND PURCHASED POWER COSTS

Minnesota Power stated the primary driver impacting 2025 fuel and purchase power costs and the resulting under collection was due to lower than forecasted company generation (which was replaced by higher priced market purchases). The Company stated actual 2025 Locational Market Prices (LMP) were approximately 20 percent higher than forecasted, about 59 percent higher than in 2024, which

⁷ Joint Comments of the Electric Utilities (Minnesota Power, Otter Tail Power and Xcel Energy) and Consumer Advocates (Minnesota Department of Commerce – Division of Energy Resources, Minnesota Office of Attorney General – Residential Utilities and Antitrust Division, Minnesota Chamber of Commerce, and Minnesota Large Industrial Group), Minnesota Power, Joint Comments, March 1, 2019, (eDockets) [20193-150778-01](#), Attachment 1.

⁸ Joint Comments of the Electric Utilities (Minnesota Power, Otter Tail Power and Xcel Energy) and Consumer Advocates (Minnesota Department of Commerce – Division of Energy Resources, Minnesota Office of Attorney General – Residential Utilities and Antitrust Division, Minnesota Chamber of Commerce, and Minnesota Large Industrial Group), Minnesota Power, Joint Comments, March 1, 2019, (eDockets) [20193-150778-01](#), Attachment 4.

⁹ Petition, at 22-31.

¹⁰ Petition, at 2.

¹¹ Petition, at 3-21.

increased the MISO market purchase price. Additionally, MP stated actual wind and hydro generation was below forecasted amounts, and were replaced by higher cost market purchases and company generation which resulted in increased total costs for 2025. The Company stated under-collection was compounded by a reduction in 2025's actual sales (total sales declined by approximately 9 percent), due to a decrease in Large Power mining sales. According to MP, total fuel costs were slightly under forecasted, but on a \$/MWh basis, actual fuel costs were 2 percent higher than forecasted, leading to the under-collection.¹²

As noted in its Petition, MP's total actual 2025 fuel clause sales were 9 percent under forecast, mainly due to decreased Large Power Taconite sales and Paper and Pulp sales.¹³ Large Power Taconite sales were more than 17 percent lower than forecast, which the Company explained was "due to an iron ore industry slowdown due to poor market conditions within the steelmaking industry."¹⁴ Inter System sales were 721,724 MWhs or 19.7 percent higher than forecast due to increased MISO Market prices and Retail Loss of Load sales, though these sales are removed from fuel adjustment clause total sales of electricity since they are non-FAC MWhs.¹⁵

MP saw higher Company owned actual generation costs of \$135.56 million compared to its forecast of \$131.82 million, a \$3.74 million or 2.84 percent increase. The Company provided several reasons for this, noting that the increase was primarily due to a rise in Locational Market Prices (LMPs) at the Laskin facility, as well as higher actual market prices than 2024, reducing generation activity (resulting in facilities being cleared by MISO more frequently than forecasted) at the Company's Laskin, Boswell, and Hibbard facilities. MP also notes transmission outages and drought conditions in Canada also drove higher priced generation being dispatched in the Company's region.¹⁶

MP's actual market purchase costs of \$64.47 million were 138.12 percent higher than its forecasted \$27.07 million¹⁷ because it purchased more energy from the market to cover load, due to decreased company generation of wind and hydro.¹⁸ Overall power market purchase costs were \$20.07 million above forecast due to these \$37.39 million above-forecast market purchases, as well as counter party purchases. MP said it made these purchases to cover load, which "can happen when generation is lower than expected, load is high, market prices are lower than expected, or MP has generating units off for outage."¹⁹

¹² Petition, at 22.

¹³ Petition, at 23.

¹⁴ Petition, Attachment 2, at 1.

¹⁵ Petition, at 23.

¹⁶ Petition, at 22 and Attachment 2, at 3.

¹⁷ Petition, Attachment 2, at 7.

¹⁸ Petition, Attachment 2, at 5.

¹⁹ Petition, Attachment 2, at 5.

The Department notes the Company’s actual MISO charges were \$42.42 million, higher than its 2025 forecast of \$39.30 million, or a 7.91 percent increase.²⁰ As previously stated above, the lower priced and less volatile MISO market seen in 2023-2024 flipped in 2025, resulting in higher MISO charges.²¹

Minnesota Power stated participation in a 2025 study (together with neighboring utilities) by the Grid North Partners group, which identified transmission solutions in the medium term, specifically involving Grid Enhancing Technologies (GETs) to identify and address Minnesota congestion. The Company also expects to see reduced congestion in the medium term, resulting from FERC Order 881 compliance, which the Commission ordered to take effect in July 2025. However, MP requested and received a Commission extension for a final implementation date of no later than December 31, 2028. This compliance filing will require transmission providers to use Ambient Adjusted Ratings, which use actual ambient temperatures (rather than default seasonal temperature assumptions) to evaluate near-term transmission service.²² MP currently has 19 transmission lines that have Ambient-Adjusted ratings developed for real-time use in its operations.²³

In the longer term, MP expects reduced congestion due to the expansion and placing into service of transmission projects such as the Long Range Transmission Plan and Northland Reliability Project currently underway, though level of congestion and related costs are difficult to predict.²⁴ MP and American Transmission Company submitted a Certificate of Need and Route Permit with the Commission for the Iron Range – St. Louis County – Arrowhead Transmission Line Project, to enhance grid reliability in the Upper Midwest, and increase grid efficiency and regional transfer capability. The Company also submitted a joint application with Otter Tail Power Company and Great River Energy for a Certificate of Need to build the MISO-approved Maple River – Cuyuna Project with the Commission, to better support regional transmission system reliability, and provide additional transmission capacity.²⁵ The Department notes these efforts will reduce congestion costs flowed through to customers via MISO charges, as well as move the Company towards meeting the Minnesota Carbon Free Standard.

The following table summarizes and compares select energy sales and cost data relevant to MP’s 2025 FCA true-up:

Table 1: Comparison of Select Forecasted to Actual Data for MP’s 2025 Fuel Clause Adjustment True-up²⁶

Data Description	2025 Forecast (A)	2025 Actual (B)	Dollar Difference (B-A)	Percentage Difference (B-A)/A
MWh Sales Subject to FPE	8,997,900	8,192,436	-805,464	-8.95%
Total Cost of Fuel/Purchased Power	\$ 271,596,420	\$ 252,456,333	\$ (19,140,087)	-7.05%
Average Fuel/Purchased Power Cost per MWh	\$ 30.18	\$ 30.82	\$ 0.64	2.12%

²⁰ Petition, at 22.

²¹ Petition, at 24.

²² Petition, at 28.

²³ Petition, at 27.

²⁴ Petition, at 29.

²⁵ Petition, at 29-30.

²⁶ Petition, Tables 1 & 2, at 22-23.

Table 1 shows MP’s relevant 2025 MWh actual sales were approximately 9 percent lower than forecasted and the Company’s total system actual fuel/purchased power costs recoverable through the FPE for 2025 were about 7 percent lower than the 2025 forecast costs. Table 1 also shows the average fuel and purchase power actual costs were about 2 percent higher than forecasted costs on a per MWh basis.

The cost and offsetting credit/revenue components of the Company’s actual and forecasted 2025 Fuel and purchased power costs recoverable through the FPE can be broken into several major categories, as summarized in the following table:

Table 2: MP’s Forecasted and Actual 2025 Fuel and Purchased Power Costs and Offsetting Credits/Revenues by Major Category²⁷

Fuel/Purchased Power Cost, Credit, or Revenue Category	2025 Forecast (A)	2025 Actual (B)	Dollar Difference (B-A)	Percentage Difference (B-A)/A
Plant Generation Costs	\$ 131,822,689	\$ 135,562,244	\$ 3,739,555	2.84%
Plus: Purchased Power Costs	\$ 228,880,278	\$ 245,300,420	\$ 16,420,142	7.17%
Plus: MISO Charges	\$ 39,304,154	\$ 42,415,048	\$ 3,110,894	7.91%
Plus: Reagent Expenses	\$ 4,925,978	\$ 4,927,028	\$ 1,050	0.02%
Plus: NOx Charges	\$ -	\$ -	\$ -	N/A
Less: MISO Schedule 16, 17, & 24	\$ (306,699)	\$ (840,768)	\$ (534,069)	174.13%
Less: Fuel Cost Recovered through Inter System Sales	\$ 132,433,585	\$ 176,631,581	\$ 44,197,996	33.37%
Less: Costs Related to Solar	\$ 2,597,139	\$ 2,199,704	\$ (397,435)	-15.30%
Plus: Time of Generation and Solar Energy Adjustment	\$ 1,387,347	\$ 2,242,109	\$ 854,762	61.61%
Initial Forecasted Cost of Fuel ²⁸	\$ 266,372,540	\$ -	\$ -	N/A
Significant Events Filing	\$ -	\$ -	\$ -	N/A
Total Cost of Fuel	\$ 271,596,420	\$ 252,456,333	\$ (19,140,087)	-7.05%
Total FPE or FCA Sales (MWh)	\$ 8,997,900	\$ 8,192,436	\$ (805,464)	-8.95%
Average Cost of Fuel	\$ 30.18	\$ 30.82	\$ 0.64	2.12%

Table 2 shows MP’s actual 2025 plant generation and purchased power costs (the two largest components of the total net fuel and purchased costs) were higher than forecasted at approximately 3 percent and 7 percent, respectively. The Company provided data in its Petition showing the average

²⁷ Petition, Table 1, at 22.

²⁸ *In the Matter of Minnesota Power’s Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2025 through December 2025*, Minnesota Public Utilities Commission, Order, November 8, 2024, Docket No. E015/AA-24-64, (eDockets) [202411-211817-01](#).

MISO market price was forecasted to be [TRADE SECRET DATA HAS BEEN EXCISED] than forecasted.²⁹ Market purchase price per MWh was higher than forecasted due to actual MISO market prices coming in at 20 percent above forecast. MP purchased more energy from the market to cover load due to a decrease in (wind and hydro) generation, and decreased Boswell 3 generation due to planned and unplanned outages.³⁰ Boswell 4 was cleared at higher levels by MISO due to the higher than forecasted market prices. MISO did not clear Boswell 3 or Hibbard as often, due to longer unplanned and planned outages, and increase in fuel costs compared to forecast, respectively.³¹

Table 3: MP Sales Reconciliation Difference between Forecasted and Actual 2025 Sales³²

2025 Sales (MWh)	Forecasted Sales (A)	Actual Sales (B)	Difference (B-A)	% Difference (B-A)/A
Total Sales of Electricity	12,710,739	12,619,493	-91,246	-0.72%
Residential	1,040,641	1,014,950	-25,691	-2.47%
Commercial	1,202,801	1,157,055	-45,746	-3.80%
Large Power Taconite	4,190,960	3,462,018	-728,942	-17.39%
Large Power Paper and Pulp	601,791	566,135	-35,656	-5.92%
Large Power Pipeline	321,073	319,824	-1,249	-0.39%
Other Miscellaneous	318,858	315,888	-2,970	-0.93%
Municipals	1,378,882	1,406,168	27,286	1.98%
Inter System Sales	3,655,733	4,377,457	721,724	19.74%
Customer intersystem Sales	1,011,240	907,534	-103,706	-10.26%
Market Sales	2,640,408	3,107,070	466,662	17.67%
Station Service	4,085	4,833	748	18.31%
Sales due to Retail and Resale Loss of Load	-	358,020	358,020	N/A
Less: Solar Generation & Purchases	57,106	49,601	-7,505	-13.14%
Total Fuel Clause Sales	8,997,900	8,192,436	-805,464	-8.95%

The Department notes that total actual customer sales decreased by approximately 91,246 MWhs, or 0.72 percent, under forecasted sales. MP stated this decrease was mainly due to decreased Large Power Taconite and Paper and Pulp sales.³³ Inter System sales, meanwhile, increased by 721,724 MWhs, or 19.7 percent, from forecasted sales mainly due to increased MISO market sales and Retail Loss of Load sales. The Company also confirmed Inter System Sales and related costs are removed from the Total Sales of Electricity as they are non-FAC MWhs.

²⁹ Petition, Table 4, at 24.

³⁰ Petition, Attachment 2, at 5.

³¹ Petition, Attachment 2, at 3

³² Petition, Table 2, at 23.

³³ Petition, at 23.

The Company experienced lower sales than forecasted, but also higher MISO Charges, higher plant generation costs, and higher purchased power costs in 2025. Total cost of fuel and purchased power was 7.05 percent lower than forecasted in 2025. However, lower sales increased the average costs of fuel charged to customers through the FPE to a 2.1 percent increase over forecasted costs.³⁴ Based on MP’s actual experience in 2025, the Department concludes it is reasonable that the Company’s actual 2025 fuel and purchased costs recoverable through the FPE were slightly more than those forecasted. The Department notes that most of the reasons for increased actual fuel and purchase power costs included increased energy market purchases, and lower wind and hydro generation, were mostly beyond MP’s control, although continued cost controls and efficiency are important to keep fuel costs reasonable. The Department recommends the Commission find MP’s actual 2025 fuel and purchased power costs recoverable through the FCA were reasonable.

D. MP’S 2025 FUEL CLAUSE ADJUSTMENT TRUE-UP

In its Petition, MP requests a net true-up recovery of \$3,468,780 in FCA under collections, attributed to lower than forecasted company generation that was replaced by higher priced market purchases, with recovery over a 12-month period effective September 1, 2026, following Commission approval.³⁵ The true-up charge reflects total under-collection of \$3,972,834 for 2025,³⁶ plus \$504,765 net overcollection from its 2023 True-Up recovery in 2024 and 2025, and minus \$711 small cancel rebill adjustments in the General Ledger. See Table 4 below for a summary of the Company’s calculation:

Table 4: Over/(Under) Collection Calculation³⁷

2025 Actual Collections from Customers	\$ 206,422,619
Less: Actual Costs and Actual Sales	\$ 210,395,453
Plus: 2023 True-Up Recovery Under-collection (2024) ³⁸	\$ (125,171)
Plus: 2023 True-Up Recovery Overcollection (2025) ³⁹	\$ 629,936
Plus: Small cancel rebill adjustments in General Ledger	\$ (711)
Remaining Under Collection = Net 2025 FCA True-Up Amount	\$ (3,468,780)

The Department finds MP correctly calculated its 2025 FCA/FPE Rider under collection of \$3,468,780. The Department considers the Company’s proposal to recover the under collection from customers effective over the 12 month period beginning September 1, 2026, following Commission approval to be reasonable.

³⁴ Instant comments, Table 2.

³⁵ Petition, at 2, and the Attachment 2 Live Excel Spreadsheet.

³⁶ \$206,422,619 - \$210,395,453 = -\$3,972,834.

³⁷ Petition, Attachment 2 Live Excel Spreadsheet.

³⁸ Docket No. E015/AA-22-216.

³⁹ Ibid.

The Department notes that MP did not provide its proposed true-up factor and asks MP to provide its 2025 true-up factor and supporting calculations in its reply comments.

E. COMPLIANCE WITH REPORTING REQUIREMENTS

The Department verified the instant Petition included the information required per the following:

- Minn. R. 7825.2800 – 7825.2840, as revised on pages 3 – 4 and approved in Point 1 of the Commission’s [Order](#).⁴⁰
 - MP filed its Petition on March 3, 2026.
- Annual FCA true-up general reporting guidelines, as outlined on page 7 and approved in Point 5 of the Commission’s [Order](#).⁴¹
 - MP’s filing included a submittal letter.
 - MP’s filing included comparison of 2025 forecast and 2025 actual, including variances by month⁴² of the following:
 - retail fuel and purchased energy adjustment
 - sales for 2025
 - MISO costs
 - unit outage information
 - MP’s filing included an explanation of why the forecasted rate differed from actual costs and why it is reasonable to credit ratepayers the difference.⁴³
- Annual FCA true-up reporting compliance matrix specific to MP as shown in Attachment 1 of the March 1, 2019 joint comments and approved in Point 7 of the Commission’s [Order](#).⁴⁴
 - MP’s filing included:
 - Fuel & Energy Source Procurement and Energy Dispatching Policies, Petition pages 5 through 10.
 - Independent Auditor’s Report, Attachment No. 1.
 - Annual Report of Automatic Adjustment Charges, Attachment No. 2.
 - Notice of Reports Availability, Attachment No. 10.
 - Monthly MISO Day 2 Charges and Allocation, Attachment No. 3.
 - Annual and Daily Ancillary Services Market Charges and Summary, Attachment No. 6.
 - Auction Revenue Rights (ARR) Process Information, Attachment No. 4.
 - Generation Facilities Maintenance Expenses, Attachment No. 9.

⁴⁰ *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Minnesota Public Utilities Commission, Order, June 12, 2019, Docket No. E999/CI-03-802, (eDockets) [20196-153514-01](#). (MPUC Order in Docket No. E999/CI-03-802).

⁴¹ MPUC Order in Docket No. E999/CI-03-802.

⁴² Petition, Attachment 2.

⁴³ Petition, at 22-31.

⁴⁴ MPUC Order in Docket No. E999/CI-03-802.

- Offsetting Revenues and/or Compensation Received by Investor-Owned Utilities, Attachment No. 8.
- Plant Outage Reporting, Attachment No. 5.
- Wind Curtailment Reporting, Attachment No. 7.

The Department notes Order Points 4 and 5 of Commission's August 7, 2025 Order, in MP's 2024 FCA True-Up petition requires the Company to provide additional ARR/FTR information, as well as a list of strategies considered and implemented to address congestion and curtailment of energy.⁴⁵ The Department expects this to be addressed in MP's upcoming 2027 FCA Forecast filing on May 1, 2026.

E.1. Maintenance Expenses of Generation Plants and Correlation to Incremental Forced Outage Costs (In the Matter of the Review of the 2005 AAA of Charges for all Electric Utilities, Docket No. E999/AA-06-1208)

The Commission required all electric utilities subject to automatic adjustment filing requirements, except for Dakota Electric, to include in future annual automatic adjustment filings the actual expenses pertaining to maintenance of generation plants, with a comparison to the generation maintenance budget from the utility's most recent rate case.⁴⁶

This requirement stems from the drastic increase in investor-owned utilities (IOUs) outage costs during FYE06 and FYE07. When a plant experiences a forced outage, the utility must replace the megawatt hours the plant would have produced if it had been operating, usually through wholesale market purchases. The cost of those market purchases flows through the FCA directly to ratepayers. The high outage costs incurred by investor-owned utilities in fiscal years 2006 and 2007 raised questions as to whether the utilities were (1) maintaining plants appropriately to prevent forced outages, and (2) spending as much on plant maintenance as they were charging to their customers in base rates. The Commission agreed with the Department and the Large Power Intervenors that "utilities have a duty to minimize unplanned facility outages through adequate maintenance and to minimize the costs of scheduled outages through careful planning, prudent timing, and efficient completion of schedule work" (Order 06-1208, p. 5).

The Department reviewed the Company's approved and actual Minnesota jurisdiction generation maintenance expenses for 2025 and found them reasonable. Steam power generation maintenance actual expenses in 2025 exceeded amounts approved in rates, while hydraulic power generation maintenance was approximately \$0.6 million lower than amounts approved in rates. MP reports a new FERC account 558 (per FERC Order 898) for the maintenance of wind and solar panels, structures, equipment and plant, which was not in place in the last rate case.⁴⁷ The Department will continue to monitor the Company's generation maintenance expenses in future filings, to ensure underspending

⁴⁵ *In the Matter of Minnesota Power's Petition for Approval of Annual Automatic Adjustment Charges for the Period of January 2024 through December 2024*, Minnesota Public Utilities Commission, Order, August 7, 2025, Docket No. E015/AA-23-180, (eDockets) [20258-221853-01](#).

⁴⁶ *In the Matter of the Review of the 2006 Annual Automatic Adjustment of Charges for All Electric and Gas Utilities*, Minnesota Public Utilities Commission, Order, February 6, 2008, Docket No. E999/AA-06-1208, (eDockets) [4928266](#).

⁴⁷ Petition, Attachment 9, at 2.

on generation maintenance expenses does not result in increased outage costs passed on to the ratepayers through the FPE.

The Department reviewed MP's incremental forced outage costs for 2025 as reported on MP's Attachment No. 5. The Company's incremental forced outage costs of \$7,459,193 were higher than their forecasted incremental forced outage costs of \$3,452,777, largely due to unplanned outages with the Company's Boswell Unit 3 and Unit 4.

Boswell Unit 3 experienced bottom ash system pluggage in January 2025, and also damage to turbine bearings #3 and #4. The Department reviewed MP's explanations for plant outages as provided in the supplement to attachment 5 – 2025 Unplanned Outages. The Company stated the bottom ash system pluggage experienced in Boswell Unit 3 was due to multiple failures on its 3-1 conveyor chain, leading to hopper overfilling and bridging. The Company stated the Boswell Unit 3 turbine bearing issues experienced in mid-2025 were due to a loss of oil suction pressure when the turning gear oil pump was shut off per standard procedure for that portion of the unit start-up, causing damage to the #4 bearing. The Company identified failure in the motor suction pump running as intended, leading to the loss of oil suction pressure. MP states after a planned outage in the fall of 2025, the #3 turbine bearing temperature increased. The Company identified the #3 bearing damage was due to the #4 bearing damage and Lube Oil Setpoint set too high at slow speeds. The Department requested further information from the Company in Information Request #2.⁴⁸ MP responded that the bearing damage was not due to human error, but from a lack of oil pressure to the bearings during critical operation. The Company states system design, monitoring, and change-management corrective actions have been or are in progress to be implemented. In addition, the Lube Oil Setpoint is believed to be a possible contributing factor, but MP confirmed the speeds were set in accordance with the turbine manufacturer guidance, and corrective actions were implemented to run the turbine in accordance with OEM guidance.

The Department notes two additional unplanned outages that attributed to a higher change in energy cost, per the event log for Attachment 5, provided in the Company's response to Information Request #1.⁴⁹ MP's Boswell Unit 4 experienced thermal fatigue cracking in a superheat tube, resulting in a one day unplanned outage in mid-February 2025. Boswell 4 also experienced a slag buildup in the reheat section of the boiler, restricting airflow through the boiler and limiting safe operation, resulting in a four day unplanned outage in late-December 2025. Both instances appear to be due to normal wear and tear and result in short-term outages.

The Department found the Company's explanations to be reasonable as true equipment failure. As a result, the Department will accept MP's forced outage costs for the 2025 true-up.

The Department concludes MP's Petition complies with the applicable reporting requirements. The Department recommends the Commission approve the compliance reporting portions of the Company's Petition.

⁴⁸ Department Attachment 1.

⁴⁹ Department Attachment 2.

IV. DEPARTMENT RECOMMENDATIONS

Based on our review, the Department concludes (1) MP's actual fuel and purchased power costs for 2025 were reasonable and prudent, (2) MP correctly calculated its 2025 FCA/FPE Rider under collection of \$3,972,834, (3) MP correctly calculated its total 2023 over-collected amount of \$504,765, included in the 2025 FCA True-Up for a net total under-collection of \$3,468,069, (4) MP to provide its 2025 true-up factor and supporting calculations, and (5) MP's Petition complies with the applicable reporting requirements.

Therefore, the Department recommends the Commission take the following actions:

- Find MP's actual 2025 fuel and purchased power costs recoverable through the FCA/FPE rider were reasonable for 2025.
- Find MP correctly calculated its 2025 FCA/FPE Rider net under-collection of \$3,468,069.
- Allow MN Power to collect \$3,468,069 in the 12-month period, beginning September 1, 2026, following approval by the Commission.
- Require MP to provide its 2025 true-up factor and supporting calculations in its reply comments.
- Approve the compliance reporting portions of MP's Petition.

Attachments



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-24-64
Requested From: Minnesota Power
Type of Inquiry: Financial

Nonpublic Public
Date of Request: 3/25/2026
Response Due: 4/6/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Justin Taylor
Email Address(es): justin.taylor@state.mn.us
Phone Number(s): 651-539-1031

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Boswell Energy Center Units 3 & 4 – Unplanned Outage
Reference(s): Petition, Attachment 5, page 7 of 7

Request:

- A. Please explain if the Boswell Unit 3 #3 bearing damage was due to human error.
- B. Please explain how the Lube Oil Setpoint was set too high at slow speeds.

To be completed by responder

Response Date: 4/6/26
Response by: Amanda Kluge
Email Address: akluge@mnpower.com
Phone Number: 218-313-4412



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-24-64
Requested From: Minnesota Power
Type of Inquiry: Financial

Nonpublic Public
Date of Request: 3/25/2026
Response Due: 4/6/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Justin Taylor
Email Address(es): justin.taylor@state.mn.us
Phone Number(s): 651-539-1031

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Response:

- A. Please explain if the Boswell Unit 3 #3 bearing damage was due to human error.
 - a. The Boswell Unit 3 #3 bearing damage was not attributable to human error. The bearing damage resulted from a lack of oil pressure to the bearings during critical operation. The investigation identified system design, monitoring, and change-management deficiencies as contributing factors. Corrective actions have been implemented or are in progress to strengthen controls, procedures, and safeguards to prevent recurrence.

- B. Please explain how the Lube Oil Setpoint was set too high at slow speeds.
 - a. The lube oil temperature setpoint had been established in accordance with turbine manufacturer guidance for high-speed operation. The internal review identified that the turbine manual specifies different setpoints for high-speed and turning-gear (low-speed) operation, and the high-speed setpoint had been applied during low-speed conditions. While this was not identified as the direct cause of the bearing damage, it may have been a contributing factor. Corrective actions were implemented to align the lube oil setpoint with turbine RPM in accordance with OEM guidance and to require formal Management of Change review for future setpoint modifications.

To be completed by responder

Response Date: 4/6/26
Response by: Amanda Kluge
Email Address: akluge@mnpower.com
Phone Number: 218-313-4412



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-24-64
Requested From: Minnesota Power
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SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Justin Taylor
Email Address(es): justin.taylor@state.mn.us
Phone Number(s): 651-539-1031

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 1
Topic: 2025 Unplanned Outages
Reference(s): Petition, page 18 & Attachment 5

Request:

Please provide the unplanned outages and associated costs "event log" for Attachment 5, as stated to be included in the initial filing on page 18.

To be completed by responder

Response Date: 4/6/2026
Response by: Amanda Kluge
Email Address: akluge@mnpower.com
Phone Number: 218-313-4412



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/AA-24-64
Requested From: Minnesota Power
Type of Inquiry: Financial

Nonpublic Public
Date of Request: 3/25/2026
Response Due: 4/6/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Justin Taylor
Email Address(es): justin.taylor@state.mn.us
Phone Number(s): 651-539-1031

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Response:

The unplanned outages and associated costs "event log" for Attachment 5 can be found in Attachment 1 of this information request.

To be completed by responder

Response Date: 4/6/2026
Response by: Amanda Kluge
Email Address: akluge@mnpower.com
Phone Number: 218-313-4412

Unit	Event Type	Primary Reason for the Outage	Start Date/Time of Actual Outage	End Date/Time of Actual Outage	Description of Equipment Failure	Failure cause and steps taken to alleviate recurrence	Change in Energy
BEC 3	Unplanned Outage	Bottom Ash System Pluggage	1/6/25 11:42	1/15/25 23:32	See Supplement to Attachment 5	See Supplement to Attachment 5	\$ 620,380
BEC 4	Unplanned Outage	Generator Protection Trip on Turbine Due to Steam Quality	1/28/25 15:22	2/1/25 15:04	Turbine vibration due to water induction resulted in false generator ground trip.	Inspected bearing, replaced wedges and shoes, added saturated superheat and saturated reheat Turbine Trips both units. Made revisions to U4 Carbon Control Screen to avoid confusion on appropriate start-up sequence. Added spare wedges and shoes to warehouse inventory.	\$ 216,868
BEC 4	Unplanned Outage	Tube Leak Rear Superheat	2/18/25 23:18	2/19/25 21:10	Superheat tube thermal fatigue cracking.	Tube sectioned out; inspection planned for next outage to determine long-term repair plan.	\$ 635,351
BEC 4	Unplanned Outage	Tube Leak Reheat	2/22/25 21:02	2/24/25 16:10	Reheat tube leak caused by thermal fatigue.	Area was pad welded and will continue to monitor.	\$ 12,168
BEC 4	Unplanned Outage	Tube Leak Rear Superheat	3/31/25 12:23	4/2/25 2:39	Superheat tube thermal fatigue cracking.	Tube sectioned out; inspection planned for next outage to determine long-term repair plan.	\$ 47,104
BEC 3	Unplanned Outage	Iso Phase Ground	4/28/25 15:58	5/2/25 23:34	During a strong storm, water ingress into the iso-phase duct caused a ground fault, resulting in an 87 relay trip.	Capacitors and surge arrestors were removed, and the iso-phase duct was hi-pot tested, confirming no active ground. The generator was also tested, with resistance values within expected ranges. The unit was returned to service without recurrence of the fault. The issue was attributed to water ingress, and the iso-phase duct was cleaned. Transformer boots were temporarily wrapped to limit water ingress, with replacement planned for the next available outage opportunity.	\$ 150,689
BEC 3	Unplanned Outage	Tube Leak Waterwall	5/3/25 11:35	5/4/25 11:24	Waterwall tube leak due to thermal fatigue.	Area was pad welded and section replacement for next outage opportunity.	\$ 17,712
BEC 4	Unplanned Outage	EHC Leak	5/15/25 16:53	5/16/25 14:28	U4 developed an EHC leak and came offline due to the volume of the leak and loss of storage tank level.	Replaced two o-rings associated with the #3 governor valve. EHC was returned to service with no leaks. Valves will be overhauled in 2027.	\$ (3,640)
BEC 3	Unplanned Outage	Tube Leak Superheat	5/20/25 12:49	5/22/25 23:56	Superheat tube thermal fatigue cracking.	Area was pad welded and section replaced.	\$ 74,101
BEC 3	Unplanned Outage	Desuperheat Spray Inlet Flange Leak	6/2/25 22:47	6/4/25 5:33	Leak at the 6" flange in the piping to the superheater desuperheater spray water control valve	Leak occurred at a high-pressure, high-temperature flange. The gasket design likely contributed to the failure under cycling conditions. Replaced gasket and installed new studs/nuts as a precaution. Verified uniform clamping force by stretching studs to 0.018" rather than relying on a torque or impact tools. Future practice involves using proven gasket style (without inner ring) and maintained controlled stud tensioning to ensure even load distribution.	\$ 24,316
BEC 3	Unplanned Outage	Tube Leak Waterwall	6/4/25 18:50	6/6/25 9:46	Waterwall tube leak due to thermal fatigue.	Area was pad welded and section replacement for next outage opportunity.	\$ 147,182
BEC 3	Unplanned Outage	Tube Leak Waterwall	6/11/25 17:51	6/13/25 7:55	Waterwall tube leak due to thermal fatigue.	Area was pad welded and section replacement for next outage opportunity.	\$ (315)
BEC 3	Unplanned Outage	Tube Leak Waterwall	7/7/25 13:13	7/9/25 13:09	Waterwall tube leak due to thermal fatigue.	Area was pad welded and section replacement for next outage opportunity.	\$ 59,100
BEC 3	Unplanned Outage	Hot Reheat Sample Line Leak	7/16/25 14:18	7/20/25 0:57	A leak was found in tubing from the hot reheat line to the water lab sample cooler while Unit 3 was already operating with a DEA heater shell leak. The combined issues led to the unit shutdown.	The tubing was replaced. The DA Heater leak was repaired. The cause of the leak was the tubing rubbing against a nearby piece of unitsrut. The replacement tubing was routed away from the unitsrut.	\$ 83,881
BEC 3	Unplanned Outage	3C Boiler Circulating Water Pump Leak	7/31/25 21:23	8/1/25 18:26	Leaks at the injection water inlet connection and the pressure gauge connection on the pump casing.	The welds were repaired. One of the welds leaked due to a wormhole which worked its way through the weld, the other weld leaked due to missing the last pass. Consider having these welds made in the shop, or by the vendor so that these welds are not made in the field.	\$ 12,732
BEC 4	Unplanned Outage	Tube Leak Reheat	8/2/25 22:03	8/4/25 14:49	Reheat tube leak caused by thermal fatigue.	Area was pad welded. Inspect during next available outage.	\$ (10,388)
BEC 4	Unplanned Outage	Deaerator Level Control Bypass Valve Repair	8/4/25 16:36	8/6/25 23:33	Failure occurred due to breakage of critical internal valve components (stem, collar and disk guide).	Valve was disassembled and repaired. Operational procedures have been revised based on failure mode analysis to better protect this valve from wear induced failure in the future.	\$ 363,791
BEC 4	Unplanned Outage	Bottom Ash Plugging	8/10/25 18:49	8/12/25 7:20	4A bottom ash grinder plugged with hardened slag, causing East bottom ash hoppers to bridge with slag/ash. With no ability to remove bottom ash, the unit was taken offline to prevent equipment damage.	Pluggage resulted from hardened slag formation and shedding following the previous week's reheat leak outage and start-up. The unit was fully deslagged and hoppers were unplugged, cleaned, and inspected. The 4A bottom ash grinder was inspected, repaired, and tested to ensure it was operable post pluggage.	\$ 382,710
BEC 3	Unplanned Outage	Tube Leak Reheat	8/16/25 21:54	8/18/25 21:08	Reheat tube leak caused by thermal fatigue.	Area was pad welded and tubes were sectioned out during fall planned outage.	\$ 125,959
BEC 3	Unplanned Outage	Tube Leak Reheat	8/31/25 9:10	9/2/25 6:04	Reheat tube leak caused by thermal fatigue.	Area was pad welded and tube was sectioned out during planned fall outage.	\$ 85,244
BEC 3	Unplanned Outage	Tube Leak Reheat	9/3/25 23:08	9/5/25 13:48	Reheat tube leak caused by thermal fatigue.	Area was pad welded. Tube was sectioned out during planned fall outage.	\$ (12,144)
BEC 3	Unplanned Outage	Tube Leak Waterwall	9/14/25 17:12	9/16/25 5:59	Waterwall tube leak due to thermal fatigue.	Area was pad welded. UT corners during maintenance outage and potential section-out during longer planned outage.	\$ 109,632
BEC 3	Unplanned Outage	Tube Leak Waterwall	9/19/25 11:18	9/21/25 1:54	Waterwall tube leak due to thermal fatigue.	Area was pad welded. UT corners during maintenance outage and potential section-out during longer planned outage.	\$ 237,159

BEC 4	Unplanned Outage	Low Vacuum Trip Due Bad Vacuum Breaker	10/2/25 20:02	10/3/25 22:38	The high pressure vacuum breaker solenoid leaked air, preventing it from holding the vacuum breaker valve closed. This resulted in a full-load vacuum trip.	A temporary repair was performed until a new style actuator less prone to failure can be installed during the spring outage.	\$ 250,222
BEC 4	Unplanned Outage	Drum Safety Repair	10/28/25 23:51	10/30/25 23:06	On 10/02/25, both main steam safety valves and at least two of the six drum safety valves lifted during a pressure excursion. All valves reseated afterward, but the SE drum safety valve leaked.	The valve was repaired. The full load unit trip caused the safety valves to lift as designed.	\$ 104,992
BEC 3	Unplanned Outage	External Tube Leak	11/3/25 15:43	11/4/25 22:04	External tube leak identified after a Master Fuel Trip caused by a Main Boiler Feed Pump trip.	Area was pad welded. Tube leaks are a known risk following hard unit trips.	\$ 42,593
BEC 3	Unplanned Outage	Number 3 and 4 Turbine Bearing Inspection	11/25/25 20:53	12/4/25 1:00	See Supplement to Attachment 5	See Supplement to Attachment 5	\$ 1,144,571
BEC 4	Unplanned Outage	Boiler Deslag Outage	12/18/25 0:21	12/22/25 1:56	Slag buildup in the reheat section of the boiler restricted airflow through the boiler, limiting safe operation.	Cleaning restored airflow, and operating limits were tightened so future slag buildup can be addressed before it restricts airflow enough to require another outage.	\$ 652,472
BEC 3	Unplanned Outage	Tube Leak Waterwall	12/22/25 12:02	12/23/25 20:53	Waterwall tube leak due to thermal fatigue.	Area was pad welded. UT corners during maintenance outage and potential section-out during longer planned outage.	\$ 132,517

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people 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/AA-24-64

Dated this 15th day of **April 2026**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kevin	Adams	kadams@caprw.org	Community Action Partnership of Ramsey & Washington Counties		450 Syndicate St N Ste 35 Saint Paul MN, 55104 United States	Electronic Service		No	AA-24-64
2	Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	AA-24-64
3	Jessica L	Bayles	jessica.bayles@stoel.com	Stoel Rives LLP		1150 18th St NW Ste 325 Washington DC, 20036 United States	Electronic Service		No	AA-24-64
4	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	AA-24-64
5	Jason	Bonnett	jason.bonnett@state.mn.us		Public Utilities Commission	121 East 7th Place suite 350 St. Paul MN, 55101 United States	Electronic Service		No	AA-24-64
6	Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 South 8th Street Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
7	Jon	Brekke	jbrekke@grenergy.com	Great River Energy		12300 Elm Creek Boulevard Maple Grove MN, 55369-4718 United States	Electronic Service		No	AA-24-64
8	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		Yes	AA-24-64
9	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	AA-24-64
10	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	AA-24-64
11	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
12	David	Cartella	david.cartella@cliffsnr.com	Cliffs Natural Resources Inc.		200 Public Square Ste 3300 Cleveland OH, 44114-2315 United States	Electronic Service		No	AA-24-64
13	Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper		115 SW First St Grand Rapids	Electronic Service		No	AA-24-64

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						MN, 55744 United States				
14	Steve W.	Chriss	stephen.chriss@walmart.com	Wal-Mart		2001 SE 10th St. Bentonville AR, 72716-5530 United States	Electronic Service		No	AA-24-64
15	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	AA-24-64
16	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
17	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
18	Patrick	Cutshall	pcutshall@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
19	Lisa	Daniels	lisadaniels@windustry.org	Windustry		201 Ridgewood Ave Minneapolis MN, 55403 United States	Electronic Service		No	AA-24-64
20	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	AA-24-64
21	J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy		408 St Peter St Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	AA-24-64
22	Brian	Edstrom	briane@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	AA-24-64
23	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	AA-24-64
24	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	AA-24-64
25	Frank	Frederickson	ffrederickson@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN,	Electronic Service		No	AA-24-64

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27	John	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA		700 Lonsdale Building 302 W Superior St Ste 700 Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
28	Barbara	Gervais	toftemn@boreal.org		Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte MN, 55615 United States	Electronic Service		No	AA-24-64
29	Jerome	Hall	hallj@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept		Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth MN, 55802-1209 United States	Electronic Service		No	AA-24-64
30	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	AA-24-64
31	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	AA-24-64
32	Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S. Eighth Street Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
33	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	AA-24-64
34	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
35	James	Jarvi		Minnesota Ore Operations - U S Steel		P O Box 417 Mountain Iron MN, 55768 United States	Paper Service		No	AA-24-64
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38	Richard	Johnson	rickjohnson@cozen.com	Cozen O'Connor		150 S. 5th Street	Electronic Service		No	AA-24-64

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45	Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP		33 South Sixth Street Suite 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24- 64
46	David	Langmo	david.langmo@sappi.com	Sappi North America		P O Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	AA-24- 64
47	Emily	Larson	elarson@duluthmn.gov	City of Duluth		411 W 1st St Rm 403 Duluth MN, 55802 United States	Electronic Service		No	AA-24- 64
48	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24- 64
49	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	AA-24- 64
50	LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association		P.O. Box 101 Two Harbors MN, 55616 United States	Electronic Service		No	AA-24- 64
51	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for		1919 University Avenue West	Electronic Service		No	AA-24- 64

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				Environmental Advocacy		Suite 515 Saint Paul MN, 55104-3435 United States				
52	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AA-24-64
53	Patrick	Loupin	patrickloupin@packagingcorp.com	Boise Cascade Corporation		PO Box 990050 Boise ID, 83799-0050 United States	Electronic Service		No	AA-24-64
54	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
55	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	AA-24-64
56	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
57	Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American		255 State Street Floor 4 Boston MA, 02109-2617 United States	Electronic Service		No	AA-24-64
58	Christine	Marquis	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall MN1180-07-MCA Minneapolis MN, 55401 United States	Electronic Service		No	AA-24-64
59	Emily	Marshall	emarshall@ourismarshall.com	Miller O'Brien Jensen, PA		120 S. 6th Street Suite 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
60	Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America		PO Box 511 2201 Avenue B Cloquet MN, 55720 United States	Electronic Service		No	AA-24-64
61	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	AA-24-64
62	Matthew	McClincy	mmclincy@usg.com	USG		35 Arch Street Clouquet MN, 55720 United States	Electronic Service		No	AA-24-64
63	Craig	McDonnell	craig.mcdonnell@state.mn.us		Minnesota Pollution Control Agency	520 Lafayette Road St. Paul MN, 55101 United States	Electronic Service		No	AA-24-64
64	Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires		570 Asbury St Ste 201	Electronic Service		No	AA-24-64

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						Saint Paul MN, 55104-1850 United States				
65	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
66	James	Mortenson	james.mortenson@state.mn.us		Office of Administrative Hearings	PO BOX 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AA-24-64
67	Evan	Mulholland	emulholland@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Ave W Ste 515 Saint Paul MN, 55101 United States	Electronic Service		No	AA-24-64
68	Travis	Murray	travis.murray@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Ste 1400 Saint Paul MN, 55101 United States	Electronic Service		No	AA-24-64
69	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
70	Michael	Noble	noble@fresh-energy.org	Fresh Energy		408 Saint Peter St Ste 350 Saint Paul MN, 55102 United States	Electronic Service		No	AA-24-64
71	Rolf	Nordstrom	rnordstrom@gpsid.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407-1229 United States	Electronic Service		No	AA-24-64
72	M. William	O'Brien	bobrien@mojlaw.com	Miller O'Brien Jensen, P.A.		120 S 6th St Ste 2400 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
73	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	AA-24-64
74	Christopher J.	Oppitz		-		PO Box 910 Park Rapids MN, 56470-0910 United States	Paper Service		No	AA-24-64
75	Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters		P.O. Box 3661 Duluth MN, 55803 United States	Electronic Service		No	AA-24-64
76	Max	Peters	maxp@cohasset-mn.com	City of Cohasset		305 NW First Ave Cohasset MN, 55721 United States	Electronic Service		No	AA-24-64
77	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street	Electronic Service		No	AA-24-64

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						Duluth MN, 55802 United States				
78	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
79	Tolaver	Rapp	tolaver.rapp@cliffsnr.com	Cliffs Natural Resources		200 Public Square Suite 3400 Cleveland OH, 44114-2318 United States	Electronic Service		No	AA-24-64
80	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	AA-24-64
81	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	AA-24-64
82	Ralph	Riberich	rriberich@uss.com	United States Steel Corp		600 Grant St Ste 2028 Pittsburgh PA, 15219 United States	Electronic Service		No	AA-24-64
83	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	AA-24-64
84	Santi	Romani		United Taconite		PO Box 180 Eveleth MN, 55734 United States	Paper Service		No	AA-24-64
85	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
86	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	AA-24-64
87	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	AA-24-64
88	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	AA-24-64
89	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	AA-24-64
90	Brett	Skyles	brett.skyles@co.itasca.mn.us	Itasca County		123 NE Fourth Street Grand Rapids	Electronic Service		No	AA-24-64

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						MN, 55744-2600 United States				
91	Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America		1405 Lawrence Road Cloquet MN, 55720 United States	Electronic Service		No	AA-24-64
92	Robert	Tammen	bobtammen@frontiernet.net			PO Box 398 Soudan MN, 55782 United States	Electronic Service		No	AA-24-64
93	Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.		PO Box 475 County Highway 666 Hoyt Lakes MN, 55750 United States	Electronic Service		No	AA-24-64
94	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	AA-24-64
95	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	AA-24-64
96	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-24-64
97	Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick		380 St. Peter St Ste 710 St. Paul MN, 55102 United States	Electronic Service		No	AA-24-64
98	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	AA-24-64
99	Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency		702 S. 3rd Avenue Virginia MN, 55792 United States	Electronic Service		No	AA-24-64