

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

|                    |              |
|--------------------|--------------|
| Katie J. Sieben    | Chair        |
| Valerie Means      | Commissioner |
| Matthew Schuerger  | Commissioner |
| Joseph K. Sullivan | Commissioner |
| John A. Tuma       | Commissioner |

In the Matter of the Application of Minnesota  
Power for Authority to Increase Rates for  
Electric Utility Service in Minnesota

ISSUE DATE: September 29, 2023

DOCKET NO. E-015/GR-21-335

ORDER APPROVING COMPLIANCE  
FILING

**PROCEDURAL HISTORY**

On December 30, 2021, the Commission issued orders suspending the request of Minnesota Power (the Company) to increase rates and establishing interim rates to be in effect while evaluating the reasonableness of the Company’s rate increase request. The Commission determined that exigent circumstances were present and established an interim rate increase of 7.11% for residential customers, and a 14.23% increase for non-residential customers beginning on January 1, 2022.

On February 28, 2023, the Commission issued its Findings of Fact, Conclusions, and Order in this case setting final rates. As part of its decision, the Commission found that it was reasonable to include revenues related to two large commercial customers—ST Paper and Cenovus—in final rates. The Commission approved a final rate increase of 8.93% applied equally across all rate classes.

On May 15, 2023, the Commission issued an order taking specific actions on reconsideration petitions that included, in part, granting a request by Minnesota Power to clarify that sales to ST Paper and Cenovus were a known and measurable change outside the test year, and that the Company may exclude, when calculating interim rate refunds, sales revenue not received from ST Paper and Cenovus during the period of interim rates; the Commission further required Minnesota Power to file its interim rate calculation in a subsequent compliance filing.

On June 14, 2023, Minnesota Power filed its compliance filing, including an interim rate calculation, for Commission consideration.

On July 17, 2023, the Department of Commerce, Division of Energy Resources (the Department) and Large Power Intervenors (LPI)<sup>1</sup> filed comments on the filing.

---

<sup>1</sup> LPI is an ad hoc consortium of Minnesota Power’s large industrial customers, including: Blandin Paper Company; Boise White Paper, a Packaging Corporation of America company, formerly known as Boise,

On July 31, 2023, the Company filed reply comments.

On August 31, the matter came before the Commission.

## **FINDINGS AND CONCLUSIONS**

### **I. Minnesota Power's Filing**

The Company's compliance filing includes information required by the Commission, including an interim rate refund plan, as well as a customer notice, the revenue requirement based on final rates, the rate design, and resulting tariffs. The Company stated that its filing is consistent with the Commission's rate case decisions and recommended that the Commission approve the filing and authorize implementation of final rates.

At issue is the Company's proposed interim rate refund plan. Dispute among the parties reflects disagreement over the methodology the Company used rather than the accuracy of the calculations themselves. The Company stated that its interim rate refunds were calculated in accordance with the methodology approved by the Commission.

The Company proposed to refund \$27,170,526, including interest. For 2022, the refund amount is \$18,406,576; for 2023 (January-April), the refund amount is \$8,763,951. The Company's compliance filing states that additional refunds will be subsequently made for the period beginning in May 2023 until the effective date of final rates.

There are two items related to the interim rate refunds at issue: the interim rate impact of residential customers and the interim rate impact of two new large industrial customers.

#### **A. Residential Customer Class Interim Rate Impact**

Minnesota Power applied an interim rate increase of 7.11% to residential customers during the interim rate period. The Commission authorized a final rate increase of 8.93%. The Company agreed to forgo collection of the difference of approximately 2.11%.

If the difference between interim rates and final rates results in an under-recovery, the Company is allowed to recover the difference *only* between the period after final rates are approved and when they become effective under Minn. Stat. § 216B.16, subd. 3(c). In this case, the Company agreed to forgo the difference it would otherwise be allowed to recover. Any under-collection that occurs during the interim rate period before final rates are approved is not recoverable. The Company will therefore not collect any portion of under-collected interim rate amounts from residential ratepayers.

The Company explained that the effect of this approach is twofold. First, residential ratepayers would not receive interim rate refunds because there was no over-collection of revenues from

---

Inc.; Cleveland-Cliffs Minorca Mine Inc.; Enbridge Energy, Limited Partnership; Gerdau Ameristeel US Inc.; Hibbing Taconite Company; Northern Foundry, LLC; Sappi Cloquet, LLC; United States Steel Corporation; United Taconite, LLC; and USG Interiors, Inc.

them during the interim rate period. Second, interim rate refunds paid to non-residential ratepayers would not be adjusted to offset the difference in amounts under-collected from residential ratepayers.

The Company stated that its refund calculation for non-residential customers reflects the final rate increase authorized by the Commission and that its final adjustments exclude any impact of the approximately 2.11% difference the Company never collected from residential customers during the interim rate period, ensuring that non-residential ratepayers are fully refunded amounts paid during the interim rate period that exceeded final rates approved.

The Company acknowledged that the calculations are complex because final rates approved are lower than interim rates for non-residential ratepayers (whose rates increased by 14.23% during the interim rate period), but the Company also maintained that its calculations are accurate and that its approach is consistent with the Commission's rate case decisions.

## **B. Large Power Customer Interim Rate Impact**

In calculating interim rate refunds for non-residential customers, the Company stated that, consistent with Commission authorization, revenues not collected from two large industrial customers (ST Paper and Cenovus) during the interim rate period were excluded from the refund calculation.<sup>2</sup> In 2022, both ST Paper and Cenovus were idle, and no revenue was collected from these customers. The calculation of interim rates for 2022 therefore does not impute to these two customers revenues not attributable to them. Both customers did, however, begin operations in January 2023.

Beginning in late January 2023, ST Paper began fully operating and as a result, the Company's proposed refund calculation includes 100% of this customer's revenues for all months in 2023.

Cenovus began operations in 2023 and had intended to resume full operations by June. As a result, the Company's refund calculation includes 50% of revenues for Cenovus between January and June 1, after which the Company proposed to reflect 100% of revenues; Cenovus had not begun full operations as of June 1, but the Company did not seek any further adjustment to its interim rate refund plan as a result.<sup>3</sup>

Based on this approach, the Company calculated an overcollection factor of 23.0771% for 2022 and an overcollection factor of 30.4875% for 2023, resulting in a refund of \$18,406,576 for 2022 and a refund of \$8,763,951 for 2023 (January-April). The Company stated that additional refund amounts for the period after April 2023 would be calculated after final rates are implemented.

---

<sup>2</sup> In its May 15, 2023 order in this docket, the Commission approved the Company's request to exclude revenues not received from these two customers during the period of interim rates. The Company's compliance filing includes its plan for implementation of this methodology and its calculations.

<sup>3</sup> Ultimately, the Company's calculations reflect the fact that Cenovus is a customer of Superior Water Light & Power, which is a wholesale customer of Minnesota Power. The calculations reflect the overall impact of Cenovus on costs (including impacts through jurisdictional allocators). These allocation factors are designed to split (primarily) costs between Minnesota (retail) -jurisdictional and Federal Energy Regulatory Commission (wholesale) - jurisdictional costs.

## II. Comments on the Filing

The Department recommended that the Commission approve the following:

- the compliance filing, including proposed revenue requirements, rate design, and resulting tariffs;
- the proposed conservation cost recovery charge (CCRC) of \$0.003957035 per kilowatt hour (kWh) to be applied to all customer classes except for approved Conservation Improvement Program (CIP)-exempt facilities; and
- the interim refund plan subject to a proposed modification discussed below.

The Department also recommended that the Commission require the Company to file a compliance filing that shows, with calculations, refunds and interest paid according to each rate class. The Department recommended that the compliance filing be filed within 10 days of interim rate refund payments made by the Company.

### A. Interim Rate Refund—Residential Customers

The Department opposed the Company's methodology for accounting for the impact of interim rates on the calculation of refunds to non-residential ratepayers. The Department contended that Minnesota Power's method erroneously results in an under-payment of interim rate refunds to non-residential customers. The Department recommended that the Company be required to calculate its refunds by treating \$7,965,112 as the amount that the Company did not collect from residential ratepayers during the interim rate period and agreed to forgo. That amount represents 7.11% of the 14.23% the Company proposed to collect in interim rates, or a difference of approximately half. Such an approach would increase refunds to non-residential ratepayers by approximately \$7,368,169.

In response, the Company stated that the Department's approach would treat the Company as if it had collected from residential ratepayers the full interim rate refund it *proposed* (14.23%), rather than accounting for the difference between interim rates collected (7.11%) and final rates approved (8.93%). In other words, the Department's approach would result in making refunds based on revenues not received, rather than actual revenues, resulting in over-payments to non-residential customers. The Company stated that such a result would be confiscatory and violate basic ratemaking principles. Further, it would upend the protection the Commission sought for residential ratepayers during the interim rate period by effectively penalizing the Company for agreeing to forgo revenues not collected.

### B. Interim Rate Refund—Non-Residential Customers

LPI recommended that the Commission reject the Company's proposal and require an increase in interim rate refunds to non-residential ratepayers of approximately \$7.7 million.

LPI stated that Minnesota Power's proposal would lead to a windfall for the Company and violate Minn. Stat. §216B.16, subd. 3(c), which directs the Commission to order refunds for excess amounts collected during interim rates, including interest. LPI argued that because the Commission's final rate decision requires that revenues from ST Paper and Cenovus be included

in the final revenue requirement, those revenues should be used to calculate interim rate refunds as well, even though such revenues were not, in fact, collected.

LPI stated that Minnesota Power is making an upward adjustment to the allowed test year increase for non-residential customer classes to deliberately decrease the difference between actual interim rates and actual final rates. LPI stated that the proper formula for issuing refunds is to ensure that refunds of excess revenues generated by interim revenues are returned to consumers in the same proportions as allocated, or a pro rata share.

In response, the Company stated that LPI's proposal would result in refunding interim rate amounts that the Company did not collect from ST Paper and Cenovus, an approach that the Company asserted is inconsistent with the Commission's directive in its May 15, 2023, order in this case. The Company stated that its methodology fulfills the Commission's intent to *not* impute revenues to these customers during the interim rate period when they were not operating and during which revenues were therefore not collected.

### **III. Commission Action**

The Commission will approve the Company's compliance filing as set forth in the ordering paragraphs below.

The Commission appreciates the Department's thorough review of the compliance filing, including numerous attachments, tariffs, and schedules.

The Commission largely concurs with the Department's analysis of the filing, with the exception of the recommended modification to the Company's interim rate refund proposal. The Commission disagrees with the Department's view that the Company's proposal would result in under-refunding amounts to non-residential ratepayers. As the Company explained, the effect of the Department's approach would be to require the Company to issue refunds based on revenues not collected from residential ratepayers by applying to its calculation the difference between proposed interim rates (14.23%) and amounts collected, rather than the difference between interim rates collected (7.11%) and final rates approved (8.93%). As a result, the Department's calculation attributes approximately \$8 million in interim revenues from residential ratepayers that the Company never received.

The Commission concurs with the Company that its methodology is consistent with the law and Commission directives. The Company's calculations remove all revenues from the residential class to ensure that there is no subsidy from non-residential customers to offset the Company's under-collection of interim rates from residential customers.

The Commission is similarly unpersuaded by LPI's arguments that the Company is deliberately attempting to reduce interim rate refunds in a manner inconsistent with Minn. Stat. §216B.16, subd. 3(c). LPI does not challenge the Company's calculations but rather the Commission's decision authorizing the Company to exclude revenues not collected from ST Paper and Cenovus. But that decision was made in the Commission's May 15, 2023, order, and LPI did not file a request for Commission reconsideration of that decision.

The Company's methodology reflects the Commission's intent to protect all ratepayers by requiring Minnesota Power to include, in its final revenue requirement calculations, revenues from two customers who had not yet begun operations during the Company's 2022 test year but who were expected to resume operations in 2023. This decision reduces the Company's overall revenue requirement, thereby reducing costs to remaining ratepayers, including large power customers, such as LPI. In making this decision, the Commission also authorized exclusion of revenues not collected from these two customers during the interim rate period, and there is no dispute that the Company did not, in fact, collect such revenues. LPI's reasoning that Minn. Stat. § 216B.16, subd. 3(c), requires the Company to make refunds based on revenues not collected during the interim rate period from non-customers is unfounded. Minnesota Power correctly calculated revenues and corresponding refunds based on the *amount collected* during the interim rate period, consistent with the statute's requirement to do so.

For all these reasons, the Commission will approve Minnesota Power's compliance filing, including its interim rate refund plan, and authorize implementation of final rates, as set forth below.

## ORDER

1. The Commission approves Minnesota Power's proposed customer notice, revenue requirements, rate design, and resulting tariffs for final rates and authorizes implementation of final rates.
2. The Commission approves Minnesota Power's proposed CCRC of \$0.003957035 per kWh to be applied to all customer classes except for approved CIP-exempt facilities.
3. The Commission approves Minnesota Power's interim rate refund plan as filed by Minnesota Power, including:
  - a. Approve a total interim overcollection amount for 2022 of \$18,406,576, including interest.
  - b. Approve a total interim overcollection amount for January-April 2023 of \$8,763,951, including interest.
4. Within 10 days of the completion of the refund for all of its customers, Minnesota Power shall file a compliance filing showing actual refunds and interest paid by rate class, including supporting calculations.
5. This order shall become effective immediately.

BY ORDER OF THE COMMISSION



Will Seuffert  
Executive Secretary



This document can be made available in alternative formats (e.g., large print or audio) by calling 651.296.0406 (voice). Persons with hearing or speech impairment may call using their preferred Telecommunications Relay Service or email [consumer.puc@state.mn.us](mailto:consumer.puc@state.mn.us) for assistance.

**CERTIFICATE OF SERVICE**

I, Mai Choua Xiong, by certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

**Minnesota Public Utilities Commission  
ORDER APPROVING COMPLIANCE FILING**

Docket Number **E-015/GR-21-335**

Dated this 29<sup>th</sup> day of September, 2023

/s/ Mai Choua Xiong



| First Name | Last Name | Email                           | Company Name   | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|---------------------------------|--|---|--------------------|-------------------|----------------------|
| Kevin      | Adams     | kadams@caprw.org                | Community Action Partnership of Ramsey & Washington Counties | 450 Syndicate St N Ste 35<br>Saint Paul, MN 55104                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Lori       | Andresen  | info@sosbluewaters.org          | Save Our Sky Blue Waters                                     | P.O. Box 3661<br>Duluth, MN 55803                                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Allen      | Barr      | allen.barr@ag.state.mn.us       | Office of the Attorney General-DOC                           | 445 Minnesota St Ste 1400<br>Saint Paul, MN 55101                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Jessica L  | Bayles    | Jessica.Bayles@stoel.com        | Stoel Rives LLP  | 1150 18th St NW Ste 325<br>Washington, DC 20036                     | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Kristin    | Berkland  | kristin.berkland@ag.state.mn.us | Office of the Attorney General-RUD                           | 445 Minnesota Street Bremer Tower, Suite 1400<br>St. Paul, MN 55101 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| David F.   | Boehm     | dboehm@bkllawfirm.com           | Boehm, Kurtz & Lowry   | 36 E 7th St Ste 1510<br>Cincinnati, OH 45202                        | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Elizabeth  | Brama     | ebrama@taftlaw.com              | Taft Stettinius & Hollister LLP                              | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis, MN 55402     | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Jon        | Brekke    | jbrekke@grenergy.com            | Great River Energy   | 12300 Elm Creek Boulevard<br>Maple Grove, MN 553694718              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Matthew    | Brodin    | mbrodin@allete.com              | Minnesota Power Company                                      | 30 West Superior St<br>Duluth, MN 55802                             | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Christina  | Brusven   | cbrusven@fredlaw.com            | Fredrikson Byron   | 60 S 6th St Ste 1500<br>Minneapolis, MN 55402-4400                  | Electronic Service | No                | OFF_SL_21-335_21-335 |
|            |           |                                 |  |   |                    |                   |                      |

| First Name     | Last Name          | Email                             | Company Name                               | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------|-----------------------------------|--|--|--------------------|-------------------|----------------------|
| Jennifer       | Cady               | jjcady@mnpower.com                | Minnesota Power                            | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| David          | Cartella           | David.Cartella@cliffsnr.com       | Cliffs Natural Resources Inc.              | 200 Public Square Ste 3300<br><br>Cleveland,<br>OH<br>44114-2315 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Greg           | Chandler           | greg.chandler@upm.com             | UPM Blandin Paper                          | 115 SW First St<br><br>Grand Rapids,<br>MN<br>55744              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Steve W.       | Chriss             | Stephen.chriss@walmart.com        | Wal-Mart                                   | 2001 SE 10th St.<br><br>Bentonville,<br>AR<br>72716-5530         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC         | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Sean           | Copeland           | seancopeland@fdlrez.com           | Fond du Lac Band of Lake Superior Chippewa | 1720 Big Lake Rd<br><br>Cloquet,<br>MN<br>55720                  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Hillary        | Creurer            | hcreurer@mnpower.com              | Minnesota Power                            | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Patrick        | Cutshall           | pcutshall@allete.com              | Minnesota Power                            | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802            | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Lisa           | Daniels            | lisadaniels@windustry.org         | Windustry                                  | 201 Ridgewood Ave<br><br>Minneapolis,<br>MN<br>55403             | Electronic Service | No                | OFF_SL_21-335_21-335 |
|                |                    |                                   |  |  |                    |                   |                      |

| First Name | Last Name      | Email                           | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|----------------|---------------------------------|---|--|--------------------|-------------------|----------------------|
| Richard    | Dornfeld       | Richard.Dornfeld@ag.state.mn.us | Office of the Attorney General-DOC      | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| J.         | Drake Hamilton | hamilton@fresh-energy.org       | Fresh Energy                            | 408 St Peter St Ste 350<br><br>Saint Paul,<br>MN<br>55101  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Brian      | Edstrom        | briane@cupminnesota.org         | Citizens Utility Board of Minnesota     | 332 Minnesota St<br>Ste W1360<br>Saint Paul,<br>MN<br>55101  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Ron        | Elwood         | relwood@mnlsap.org              | Legal Services Advocacy Project         | 970 Raymond Avenue<br>Suite G-40<br>Saint Paul,<br>MN<br>55114   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Sharon     | Ferguson       | sharon.ferguson@state.mn.us     | Department of Commerce                  | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Frank      | Frederickson   | ffrederickson@mnpower.com       | Minnesota Power                         | 30 W Superior St.<br><br>Duluth,<br>MN<br>55802  | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Edward     | Garvey         | garveyed@aol.com                | Residence                               | 32 Lawton St<br><br>Saint Paul,<br>MN<br>55102   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| John R.    | Gasele         | jpgasele@fryberger.com          | Fryberger Buchanan Smith & Frederick PA | 700 Lonsdale Building<br>302 W Superior St Ste 700<br>Duluth,<br>MN<br>55802                             | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Bruce      | Gerhardson     | bgerhardson@otpc.com            | Otter Tail Power Company                | PO Box 496<br>215 S Cascade St<br>Fergus Falls,<br>MN<br>565380496                                       | Electronic Service | No                | OFF_SL_21-335_21-335 |
|            |                |                                 |   |  |                    |                   |                      |

| First Name | Last Name | Email                              | Company Name                             | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|------------------------------------|--|--|--------------------|-------------------|----------------------|
| Barbara    | Gervais   | toftemn@boreal.org                 | Town of Tofte                            | P O Box 2293<br>7240 Tofte Park Road<br>Tofte,<br>MN<br>55615              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Jerome     | Hall      | hallj@stlouiscountymn.gov          | Saint Louis County<br>Property Mgmt Dept | Duluth Courthouse<br>100 N 5th Ave W Rm 515<br>Duluth,<br>MN<br>55802-1209 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Adam       | Heinen    | aheinen@dakotaelectric.com         | Dakota Electric Association              | 4300 220th St W<br><br>Farmington,<br>MN<br>55024                          | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Kimberly   | Hellwig   | kimberly.hellwig@stoel.com         | Stoel Rives LLP                          | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Annete     | Henkel    | mui@mutilityinvestors.org          | Minnesota Utility Investors              | 413 Wacouta Street<br>#230<br>St.Paul,<br>MN<br>55101                      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Valerie    | Herring   | vherring@taftlaw.com               | Taft Stettinius & Hollister<br>LLP       | 2200 IDS Center<br>80 S. Eighth Street<br>Minneapolis,<br>MN<br>55402      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Katherine  | Hinderlie | katherine.hinderlie@ag.state.mn.us | Office of the Attorney<br>General-DOC    | 445 Minnesota St<br>Suite 1400<br>St. Paul,<br>MN<br>55101-2134            | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Lori       | Hoyum     | lhoyum@mnpower.com                 | Minnesota Power                          | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802                      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| James      | Jarvi     | N/A                                | Minnesota Ore Operations<br>- U S Steel  | P O Box 417<br><br>Mountain Iron,<br>MN<br>55768                           | Paper Service      | No                | OFF_SL_21-335_21-335 |
| Alan       | Jenkins   | aj@jenkinsatlaw.com                | Jenkins at Law                           | 2950 Yellowtail Ave.<br><br>Marathon,<br>FL<br>33050                       | Electronic Service | No                | OFF_SL_21-335_21-335 |

| First Name | Last Name        | Email                        | Company Name                    | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|------------------|------------------------------|---------------------------------|--|--------------------|-------------------|----------------------|
| Richard    | Johnson          | Rick.Johnson@lawmoss.com     | Moss & Barnett                  | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402     | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Sarah      | Johnson Phillips | sarah.phillips@stoel.com     | Stoel Rives LLP                 | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Nick       | Kaneski          | nick.kaneski@enbridge.com    | Enbridge Energy Company, Inc.   | 11 East Superior St Ste<br>125<br><br>Duluth,<br>MN<br>55802       | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Travis     | Kolari           | N/A                          | Keetac                          | PO Box 217<br><br>Keewatin,<br>MN<br>55753                         | Paper Service      | No                | OFF_SL_21-335_21-335 |
| Michael    | Krikava          | mkrikava@taftlaw.com         | Taft Stettinius & Hollister LLP | 2200 IDS Center<br>80 S 8th St<br>Minneapolis,<br>MN<br>55402      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Becky      | Lammi            | cityclerk@ci.aurora.mn.us    | City of Aurora                  | 16 W 2nd Ave N<br>PO Box 160<br>Aurora,<br>MN<br>55705             | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Carmel     | Laney            | carmel.laney@stoel.com       | Stoel Rives LLP                 | 33 South Sixth Street<br>Suite 4200<br>Minneapolis,<br>MN<br>55402 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| David      | Langmo           | david.langmo@sappi.com       | Sappi North America             | P O Box 511<br>2201 Avenue B<br>Cloquet,<br>MN<br>55720            | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Emily      | Larson           | eLarson@duluthmn.gov         | City of Duluth                  | 411 W 1st St Rm 403<br><br>Duluth,<br>MN<br>55802                  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| James D.   | Larson           | james.larson@avantenergy.com | Avant Energy Services           | 220 S 6th St Ste 1300<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_21-335_21-335 |

| First Name | Last Name     | Email                            | Company Name                                | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|---------------|----------------------------------|---|---|--------------------|-------------------|----------------------|
| Annie      | Levenson Falk | annief@cubminnesota.org          | Citizens Utility Board of Minnesota         | 332 Minnesota Street,<br>Suite W1360<br><br>St. Paul,<br>MN<br>55101            | Electronic Service | No                | OFF_SL_21-335_21-335 |
| LeRoger    | Lind          | llind@yahoo.com                  | Save Lake Superior Association              | P.O. Box 101<br><br>Two Harbors,<br>MN<br>55616                                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Eric       | Lindberg      | elindberg@mncenter.org           | Minnesota Center for Environmental Advocacy | 1919 University Avenue West<br><br>Suite 515<br>Saint Paul,<br>MN<br>55104-3435 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Patrick    | Loupin        | PatrickLoupin@Packaging Corp.com | Packaging Corporation of America            | PO Box 990050<br><br>Boise,<br>ID<br>83799-0050                                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Susan      | Ludwig        | sludwig@mnpower.com              | Minnesota Power                             | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802                           | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Peter E.   | Madsen        | pmadsen@taftlaw.com              | Taft Stettinius & Hollister LLP             | 2200 IDS Center<br>80 South 8th Street<br>Minneapolis,<br>MN<br>55402           | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Kavita     | Maini         | kmains@wi.rr.com                 | KM Energy Consulting, LLC                   | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066                           | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Discovery  | Manager       | discoverymanager@mnpower.com     | Minnesota Power                             | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                                  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Sarah      | Manchester    | sarah.manchester@sappi.com       | Sappi North American                        | 255 State Street<br>Floor 4<br>Boston,<br>MA<br>02109-2617                      | Electronic Service | No                | OFF_SL_21-335_21-335 |
|            |               |                                  |   |   |                    |                   |                      |

| 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 E 7th St<br><br>St Paul,<br>MN<br>55106   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Keith      | Matzdorf  | keith.matzdorf@sappi.com    | Sappi Fine Paper North America     | PO Box 511<br>2201 Avenue B<br>Cloquet,<br>MN<br>55720  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Daryl      | Maxwell   | dmaxwell@hydro.mb.ca        | Manitoba Hydro                     | 360 Portage Ave FL 16<br>PO Box 815, Station Main<br>Winnipeg,<br>MB<br>R3C 2P4<br><br>CANADA | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Matthew    | McClincy  | MMcClincy@usg.com           | USG                                | 35 Arch Street<br><br>Clouquet,<br>MN<br>55720  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Craig      | McDonnell | Craig.McDonnell@state.mn.us | MN Pollution Control Agency        | 520 Lafayette Road<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Natalie    | McIntire  | natalie.mcintire@gmail.com  | Wind on the Wires                  | 570 Asbury St Ste 201<br><br>Saint Paul,<br>MN<br>55104-1850                                  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Joseph     | Meyer     | joseph.meyer@ag.state.mn.us | Office of the Attorney General-RUD | Bremer Tower, Suite 1400<br>445 Minnesota Street<br>St Paul,<br>MN<br>55101-2131              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| David      | Moeller   | dmoeller@allete.com         | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022093  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Andrew     | Moratzka  | andrew.moratzka@stoel.com   | Stoel Rives LLP                    | 33 South Sixth St Ste 4200<br><br>Minneapolis,<br>MN<br>55402                                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
|            |           |                             |                                    |   |                    |                   |                      |

| First Name     | Last Name  | Email                        | Company Name                                | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|------------|------------------------------|---|---|--------------------|-------------------|----------------------|
| James          | Mortenson  | james.mortenson@state.mn.us  | Office of Administrative Hearings           | PO BOX 64620<br><br>St. Paul, MN<br>55164-0620                | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Evan           | Mulholland | emulholland@mncenter.org     | Minnesota Center for Environmental Advocacy | 1919 University Ave W Ste 515<br><br>Saint Paul, MN<br>55101  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Travis         | Murray     | travis.murray@ag.state.mn.us | Office of the Attorney General-RUD          | 445 Minnesota St Ste 1400<br><br>Saint Paul, MN<br>55101      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| David          | Niles      | david.niles@avantenergy.com  | Minnesota Municipal Power Agency            | 220 South Sixth Street Suite 1300<br>Minneapolis, MN<br>55402 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Michael        | Noble      | noble@fresh-energy.org       | Fresh Energy                                | 408 Saint Peter St Ste 350<br><br>Saint Paul, MN<br>55102     | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Rolf           | Nordstrom  | rnordstrom@gpisd.net         | Great Plains Institute                      | 2801 21ST AVE S STE 220<br><br>Minneapolis, MN<br>55407-1229  | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Christopher J. | Oppitz     | N/A                          | -   | PO Box 910<br><br>Park Rapids, MN<br>56470-0910               | Paper Service      | No                | OFF_SL_21-335_21-335 |
| Elanne         | Palcich    | epalcich@cpinternet.com      | Save Our Sky Blue Waters                    | P.O. Box 3661<br><br>Duluth, MN<br>55803                      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Max            | Peters     | maxp@cohasset-mn.com         | City of Cohasset                            | 305 NW First Ave<br><br>Cohasset, MN<br>55721                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
|                |            |                              |   |   |                    |                   |                      |



| First Name     | Last Name                      | Email                                | Company Name                            | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|----------------|--------------------------------|--------------------------------------|---|--|--------------------|-------------------|----------------------|
| Jennifer       | Peterson                       | jjpeterson@mnpower.com               | Minnesota Power                         | 30 West Superior Street<br><br>Duluth,<br>MN<br>55802              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| William        | Phillips                       | wphillips@aarp.org                   | AARP                                    | 30 E. 7th St Suite 1200<br><br>St. Paul,<br>MN<br>55101            | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Marcia         | Podratz                        | mpodratz@mnpower.com                 | Minnesota Power                         | 30 W Superior S<br><br>Duluth,<br>MN<br>55802                      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Tolaver        | Rapp                           | Tolaver.Rapp@cliffsnr.com            | Cliffs Natural Resources                | 200 Public Square<br>Suite 3400<br>Cleveland,<br>OH<br>441142318   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney<br>General-RUD   | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131 | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Kevin          | Reuther                        | kreuther@mncenter.org                | MN Center for<br>Environmental Advocacy | 26 E Exchange St, Ste 206<br><br>St. Paul,<br>MN<br>551011667      | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Ralph          | Riberich                       | rriberich@uss.com                    | United States Steel Corp                | 600 Grant St Ste 2028<br><br>Pittsburgh,<br>PA<br>15219            | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Buddy          | Robinson                       | buddy@citizensfed.org                | Minnesota Citizens<br>Federation NE     | 2110 W. 1st Street<br><br>Duluth,<br>MN<br>55806                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Santi          | Romani                         | N/A                                  | United Taconite                         | PO Box 180<br><br>Eveleth,<br>MN<br>55734                          | Paper Service      | No                | OFF_SL_21-335_21-335 |
| Susan          | Romans                         | sromans@allete.com                   | Minnesota Power                         | 30 West Superior Street<br>Legal Dept<br>Duluth,<br>MN<br>55802    | Electronic Service | No                | OFF_SL_21-335_21-335 |

| First Name | Last Name      | Email                        | Company Name   | Address   | Delivery Method    | View Trade Secret | Service List Name    |
|------------|----------------|------------------------------|--|---|--------------------|-------------------|----------------------|
| Peter      | Scholtz        | peter.scholtz@ag.state.mn.us | Office of the Attorney General-RUD                   | Suite 1400<br>445 Minnesota Street<br>St. Paul,<br>MN<br>55101-2131       | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Robert H.  | Schulte        | rhs@schulteassociates.com    | Schulte Associates LLC                               | 1742 Patriot Rd<br><br>Northfield,<br>MN<br>55057                         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Will       | Seuffert       | Will.Seuffert@state.mn.us    | Public Utilities Commission                          | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101                    | Electronic Service | Yes               | OFF_SL_21-335_21-335 |
| Janet      | Shaddix Elling | jshaddix@janetshaddix.com    | Shaddix And Associates                               | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423               | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Doug       | Shoemaker      | dougs@charter.net            | Minnesota Renewable Energy                           | 2928 5th Ave S<br><br>Minneapolis,<br>MN<br>55408                         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Brett      | Skyles         | Brett.Skyles@co.itasca.mn.us | Itasca County  | 123 NE Fourth Street<br><br>Grand Rapids,<br>MN<br>557442600              | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Richard    | Staffon        | rcstaffon@msn.com            | W. J. McCabe Chapter, Izaak Walton League of America | 1405 Lawrence Road<br><br>Cloquet,<br>MN<br>55720                         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| James M    | Strommen       | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered                          | 150 S 5th St Ste 700<br><br>Minneapolis,<br>MN<br>55402                   | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Eric       | Swanson        | eswanson@winthrop.com        | Winthrop & Weinstine                                 | 225 S 6th St Ste 3500<br>Capella Tower<br>Minneapolis,<br>MN<br>554024629 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Robert     | Tammen         | bobtammen@frontiernet.net    | Wetland Action Group                                 | PO Box 398<br><br>Soudan,<br>MN<br>55782                                  | Electronic Service | No                | OFF_SL_21-335_21-335 |

| First Name | Last Name | Email                          | Company Name                           | Address  | Delivery Method    | View Trade Secret | Service List Name    |
|------------|-----------|--------------------------------|--|--|--------------------|-------------------|----------------------|
| Jim        | Tieberg   | jtieberg@polymetmining.com     | PolyMet Mining, Inc.                   | PO Box 475<br>County Highway 666<br>Hoyt Lakes,<br>MN<br>55750                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Jessica    | Tritsch   | jessica.tritsch@sierraclub.org | Sierra Club                            | 2327 E Franklin Ave<br><br>Minneapolis,<br>MN<br>55406                         | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Kristen    | Vake      | kvake@taconite.org             | Iron Mining Association of Minnesota   | 1003 Discovery Drive<br><br>Chisholm,<br>MN<br>55719                           | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Claire     | Vatalaro  | cvatalaro@allete.com           | Allete                                 | 30 W Superior St<br><br>Duluth,<br>MN<br>55802                                 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Kodi       | Verhalen  | kverhalen@taftlaw.com          | Taft Stettinius & Hollister LLP        | 80 S 8th St Ste 2200<br><br>Minneapolis,<br>MN<br>55402                        | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Kevin      | Walli     | kwalli@fryberger.com           | Fryberger, Buchanan, Smith & Frederick | 380 St. Peter St Ste 710<br><br>St. Paul,<br>MN<br>55102                       | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Laurie     | Williams  | laurie.williams@sierraclub.org | Sierra Club                            | Environmental Law Program<br>1536 Wynkoop St Ste 200<br>Denver,<br>CO<br>80202 | Electronic Service | No                | OFF_SL_21-335_21-335 |
| Scott      | Zahorik   | scott.zahorik@aeoa.org         | Arrowhead Economic Opportunity Agency  | 702 S. 3rd Avenue<br><br>Virginia,<br>MN<br>55792                              | Electronic Service | No                | OFF_SL_21-335_21-335 |