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November 2, 2017

VIA E-FILING

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of a Petition to Ensure Competitive Electric Rates for Energy-Intensive Trade- Exposed Customers
Docket No.: E015/M-16-564

Dear Mr. Wolf:

Minnesota Power hereby electronically submits its Petition for Reconsideration in the above-referenced Docket.

Please contact me at the number provided above with any questions or concerns.

Yours truly,

David R. Moeller

DRM:sr
cc: Official Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of a Revised Petition by Minnesota Power for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider	Docket No. E015/M-16-564 **MINNESOTA POWER'S PETITION FOR RECONSIDERATION**

I. INTRODUCTION

On October 13, 2017, the Minnesota Public Utilities Commission ("Commission") issued its Order in Docket E015/M-16-564 ("October 2017 Order") regarding Minnesota Power's compliance filing from the Energy-Intensive Trade-Exposed ("EITE") docket. Minnesota Power respectfully submits that the October 2017 Order and the prior April 20, 2017 Order ("April 2017 Order") do not comport with the settled standards for administrative agency decisions articulated in each of Minn. Stat. §§ 14.69(a) – (f). This decision is not supported by the record, is contrary to applicable law and statutory standards established under Minn. Stat. § 216B.1696 ("EITE Statute"), violates legal principles and is otherwise arbitrary and capricious.

As a result, the Company respectfully requests that the Commission reconsider its October 2017 Order and April 2017 Order pursuant to Minn. Stat. § 216B.27, subd. 1 and Minn. Rule 7829.3000. The Company's fundamental assertion in requesting reconsideration is that the Commission erred by violating the utility revenue neutrality standard set forth under Minn. Stat. § 216B.1696, subd. 2(d). Specifically, the Commission's decision to retroactively consider use of 2016 actual revenues as a baseline in determining EITE refunds to non-EITE customers results in Minnesota Power not being able to utilize a tracker account as authorized by the Commission's December 21, 2016 Order ("December 2016 Order"). Further, the Commission's decision eliminates the fundamental legislative basis under which Minnesota Power went forward with implementing the EITE Customers Rider ("EITE discount") effective February 1, 2017, due to the fact that revenue neutrality cannot be realized without proper use of the tracker, as directed per the Commission's December 2016 order.

Based upon the Commission's October 2017 Order, and pending further resolution of the issues in either this Docket or Minnesota Power's pending rate case in Docket No. E015/GR-16-664, Minnesota Power informed the Commission in its September 29, 2017 Letter of its suspension of the EITE discount.

II. PETITION FOR RECONSIDERATION

When the EITE Statute was enacted by the Legislature and signed by the Governor in 2015, it addressed cost neutrality for the implementing utility, in this case, Minnesota Power. As the Commission's December 2016 Order stated: "Minn. Stat. § 216B.1696, subd. 2[(d)] requires that the Company be allowed to recover the costs of its EITE rate schedule either through a cost recovery rider or in its next general rate case." Minn. Stat. § 216B.1696, subd. 2(d) states, "In its next general rate case or through an EITE cost recovery rate rider between general rate cases, the commission shall allow the utility to recover any costs, including reduced revenues, or refund any savings, including increased revenues, associated with providing service to a customer under an EITE rate schedule." While the statute expressly addresses cost neutrality for Minnesota Power, this concept was violated when the Commission adopted the OAG's recommendation in its April 2017 Order and affirmed in its October 2017 Order, the result of the decisions being that Minnesota Power cannot recover costs associated with providing service under the Commission-approved EITE rate schedule.

Minnesota Power's tracker account is not able to function as intended

Upon approval of the Commission's December 2016 Order, Minnesota Power was authorized to establish a tracker account (Order Paragraph 7), in support of the EITE Statute requirement "Upon approval of any EITE rate schedule, the utility shall create a separate account to track the difference in revenue between what would have been collected under the electric utility's applicable standard tariff and the EITE rate schedule." The Commission specifically did not rely upon cost recovery or future rate case considerations in making this determination, and in fact stated: "And to remain strictly within the bounds established by the legislature, the Commission's finding does not concern possible rate impacts for customers subject to cost recovery under the statute." December 2016 Order at 11. The Order also noted that Minnesota

Power's proposed cost recovery rider would recoup costs of the EITE discount from non-EITE customers and defined a rate schedule for purposes of the EITE Statute. Minn. Stat. § 216B.1696, subd. 1(d) and December 2016 Order at 5. It is the amount within the EITE rate schedule that is recorded in the separate tracker account. Minn. Stat. § 216B.1696, subd. 2(d). However, to follow the statute, and specifically to be revenue neutral for Minnesota Power, this same tracker amount, which is a cost to Minnesota Power, needs to be fully recovered from non-EITE customers - exempting low-income customers. The Commission Order prevents Minnesota Power from collecting that tracker amount, as well as the costs of providing the EITE rate, by establishing a baseline and by retroactively setting that baseline as 2016 year-end revenue – initially in its April 2017 Order and as affirmed in its October 2017 Order,

It is now clear that an event occurred between the Commission's December 2016 Order authorizing the EITE rate and the March 9, 2017 agenda hearing for the EITE Cost Recovery Rider that had the result of unfavorably impacting the deliberation and review of the EITE Cost Recovery Rider. This event was United States Steel Corporation's decision to restart US Steel's Keetac operation in Keewatin, Minnesota ("Keetac"). As stated at the March 9, 2017 hearing, Minnesota Power agrees that United States Steel attributed the restart of Keetac in part to the Commission's approval of the EITE discount at its September 15, 2016 agenda hearing. (See March 9, 2017 Agenda Transcript at 33-34 and US Steel March 10, 2017 Letter stating that "measures such as the 2016 Commission approval of the EITE Customers Rider were crucial ingredients in our ability to realize the startup of Keetac this month."). However, it is important to note that, at the time of US Steel's December 1, 2016 demand nomination and Minnesota Power subsequent voluntary lowering of its interim rate request, the Commission's December 2016 Order had not yet been issued and the Commission had separated any cost recovery decisions for non-EITE customers.

In fact, the EITE rate schedule was not implemented until February 1, 2017, which Minnesota Power considers to be the earliest possible effective date following receipt of the Order. This is an extremely relevant point that was overlooked in the Commission decision because there was no "difference in revenue" as defined by statute when the December 2016 Order was issued. The difference in revenue that was tracked in the Commission-approved tracker account only began when the EITE discount became effective. In other words, the Commission is comparing the applicable standard tariff for all EITE customers as of December 31, 2016 to that as of February 1, 2017 when the EITE discount took effect. This is not the difference that Minnesota Power has recorded in its EITE tracker account. The result is that EITE customers to-date have paid almost $9 million less to Minnesota Power through the EITE discount that they would have paid under the applicable standard tariff; specifically, the Large Power Service Schedule and corresponding Electric Service Agreements.

The Commission actions of adopting and affirming a refund mechanism for conditions that existed prior to establishment of the tracker and prior to the effective date of the EITE discount created a tracker balance that Minnesota Power will likely never be able to collect from Non-EITE Customers. Minnesota Power's adjustments proposed in its compliance filing would correct that discrepancy and would allow for both increased and reduced revenues t**o** be reflected in the proper functioning of the tracker per the legislative intent of the statute. Specifically, since the 2016 baseline had no revenues for Keetac, the Commission in adopting the OAG's approach, captured all of the Keetac revenues to provide the refund for non-EITE customers, the result being that for the four-year term of the EITE discount will likely never be recovered from non-EITE customers, and logic would suggest that, if the non-EITE customers do not support the EITE discount through a charge from the tracker then Minnesota Power is the only other possible entity to support the credits provided to EITE customers. This outcome occurs whether or not the EITE discount is successful in encouraging high levels of production from EITE customers. For example, if another EITE customer has a down year in 2018 and less EITE discount is provided, in theory the Energy Charge Credit is not as successful, but the outcome for non-EITE customers will almost certainly be the same – no cost recovery from non-EITE customers, with any cost recovery fully refunded due to the use of the 2016 baseline established in the April 2017 Order and not modified in the October 2017 Order. See Minnesota Power's April 12, 2017 Reply Comments, Attachment A. Neither the EITE Statute or the record support the direction of the additional Keetac revenues to the EITE discount in such a manner as adopted by the Commission. In both establishing a baseline and retroactively setting it as of the end of 2016 in its April 2017 Order and affirmed in its October 2017 Order, the Commission made an outcome based decision that contradicts the language and intent of the EITE Statute and Minnesota Power's Energy Charge Credit.

Minnesota Power is not Revenue Neutral as result of the Commission Order

To further illustrate why the EITE refund requirement is not revenue neutral to Minnesota Power and negates the December 2016 Order and intent of the EITE Statute, the following two figures are provided.

Figure 1.

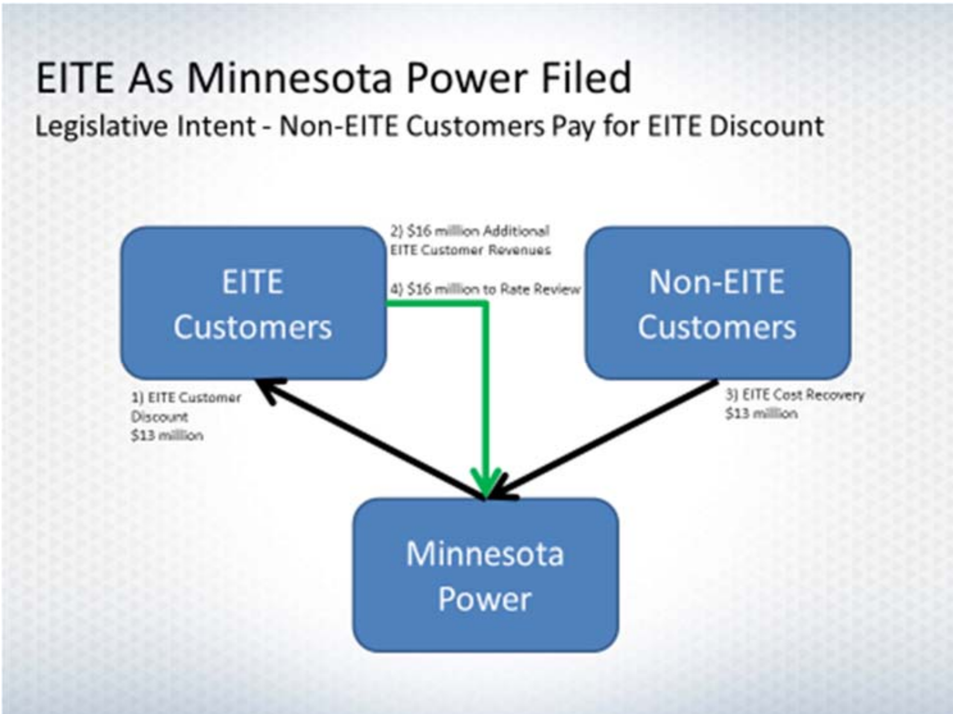

Figure 1 provides an illustration of how Minnesota Power filing intended to recoup the "costs" of the EITE discount from non-EITE customers. Under Minnesota Power's original Petition, the Company asked that the amount provided to EITE customers as a discount be recovered from Non-EITE customers as was the intent of the legislation.

The transactions were anticipated to be treated as follows:

1) The Company offers the EITE discount to the EITE customers for approximately $13 million dollars in 2017.

2) The EITE Companies generate approximately $16 million in additional revenue that is collected by Minnesota Power.

3) Minnesota Power then bills the Non-EITE customers for the cost recovery of the EITE discount given to EITE customers for $13 million dollars.

4) The incremental $16 million dollars received by Minnesota Power in additional EITE customer revenues is used to reduce the revenue deficiency in the current rate case.

The EITE discount equals the cost recovery from Non-EITE customers in this case. Minnesota Power is revenue neutral as is defined by the EITE Statute. This scenario as anticipated by Minnesota Power in the Company's original petition is about working toward competitive rates as a rate design issue for Minnesota's EITE customers. Tracker balances would be established to account for the differences that arise during the year due to changes in the estimates used to establish cost recovery billing factors. Any over or under recovery would be accumulated in the tracker and factored into the following year's cost recovery billing factors. In the end, after the EITE discount is discontinued, any remaining tracker balance would either be recovered from customers or refunded to customers.

The anticipated $13.5 million of the first year of the EITE discount would have been collected from non-EITE customers. Minnesota Power is no better nor any worse off. Any additional or loss of revenues, including the interim rate reductions accepted by the Commission, would then presumably be addressed in the rate case.

Figure 2.

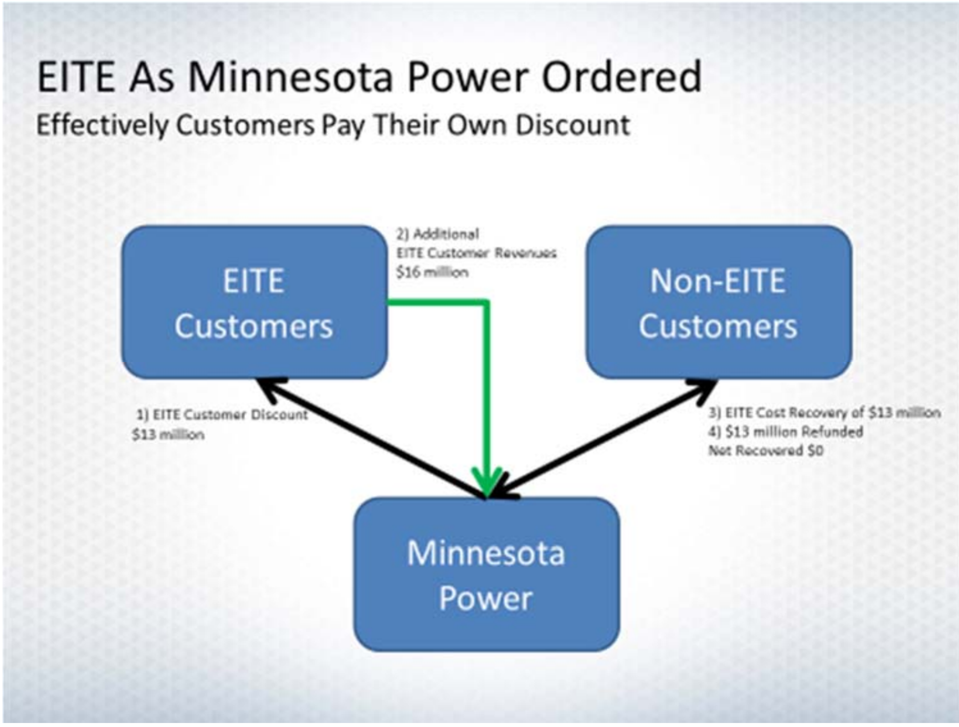

Figure 2 provides an illustration of how the Commission's April 2017 Order and October 2017 Order would be applied. EITE customers, the source of the additional $16 million in revenues, are in effect paying for their own discount instead of non-EITE customers. Instead of Minnesota Power being the pass-through between EITE customers and non-EITE customers, Minnesota Power has a tracker account that would have a negative $13.5 million balance in the first year (currently over $8 million) and has no ability to recoup that amount from non-EITE customers. This is not revenue neutral to Minnesota Power nor does it reflect the requirements in the EITE Statute.

Under the Commission's orders, the amount provided to EITE customers as a discount would not always be recovered from Non-EITE customers, as was the intent of the legislation. In certain cases, like the anticipated 2017 situation, the Company would not be kept revenue neutral and the EITE customers in the end would be effectively paying their own discount and tracker balances become unrecoverable under scenarios like 2017.

The transactions as a result of the order would be treated as follows:

1) As in the first case the Company offers the EITE discount to the EITE customers for approximately $13 million dollars in 2107.

2) Also, the EITE customers generate approximately $16 million in additional revenue that is collected by Minnesota Power.

3) Minnesota Power then bills the Non-EITE customers for the cost recovery of the EITE discount given to EITE customers for $13 million dollars.

4) Under this scenario the Non-EITE customers are refunded their original cost recovery revenues collected by Minnesota Power, or more likely would never be billed originally given the current estimates of EITE customer revenues for 2017.

The incremental $16 million dollars received by Minnesota Power in additional EITE customer revenues would not be used to reduce the revenue deficiency in the current rate review. Additionally, the following question is created: How is the incremental $3 million dollars collected from EITE customers handled in this scenario? It is very unclear due to the "leakage" created by the Commission's orders.

The EITE discount does not equal the net cost recovery from Non-EITE customers in this case. Minnesota Power is no longer revenue neutral as is defined by the EITE Statute. This scenario as ordered by the Commission is not about establishing competitive rates for Minnesota's EITE customers, but is an incentive rate as was discussed by Commissioner's during deliberations. That was clearly not the intent of the EITE Statute. The erroneous interpretation of the statute by the Commission, as reflected in the April 2017 and the October 2017 Orders results in the creation of tracker balances that were established under the Commission's December 2016 Order approving the EITE rate that can never be collected. In fact as the tracker balances would need to be paid off from revenues collected from EITE customer revenues already collected and booked as large power revenues, these tracker balances would need to be written off by Minnesota Power under the Commission order scenario. In the end, after the EITE discount is paid for by the EITE customer revenues received by Minnesota Power and the Commission order on cost recovery make the tracker balances approved and established by the Commission in the December 2016 Order, uncollectable.

Implementation of the Order as described in the example in Figure 2 also reflects why the Commission's October 2017 Order incorrectly states: "To do as the Company now recommends would essentially deprive EITE customers of the full benefit of the EITE rate as intended by the statute." Order at 5. By ordering Minnesota Power to refund the entire EITE discount amount to Non-EITE customers, the Commission deprives EITE customers of the full benefit of the EITE rate because the source of that refund is from one specific EITE customer, Keetac. Further, the Commission has interpreted the EITE Statute as providing two separate Commission considerations into granting or denying the EITE rate schedule and how cost recovery should occur in a rider or a general rate case. By reaching back to the December 2016 Order in its April 2017 Order and supported through its October 2017 Order, the Commission has improperly applied the EITE Statute and standard of review set forth under Minn. Stat. § 216B.1696, subd. 2(b) and more importantly the legislative directive that: "It is the energy policy of the state of Minnesota to ensure competitive electric rates for energy-intensive trade-exposed customers." Minn. Stat. § 216B.1696, subd. 2(a). Adopting the Company's proposal adheres to the revenue neutrality requirement under the EITE Statute to the benefit of EITE customers, not the detriment.

III. CONCLUSION

EITE customers continue to face competitive pressures that are very real, as evidenced by the UPM Blandin announcement of the permanent shut down of its Paper Machine 5 and the relating layoffs of 150 employees. Minnesota Power respectfully requests that the Commission reconsider its April 2017 Order and October 2017 Order to ensure the energy policy of the State of Minnesota is fully implemented for EITE Customers and Minnesota Power through creation of conditions under which Minnesota Power can follow the EITE statute by providing competitive rates for energy-intensive trade-exposed customers through the EITE rate, recover those costs through a revenue-neutral tracker mechanism, and hence can subsequently restart the EITE rate for its EITE customers, hopefully delaying or averting the next unfortunate customer announcement.

Dated: November 2, 2017

Respectfully,

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STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the **2nd** day of **November, 2017**, she served Minnesota Power's Petition for Reconsideration in **Docket No. E015/M-16-564** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on the attached Official Service List were served as requested.

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Susan Romans

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