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May 18, 2020

VIA ELECTRONIC FILING

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

Re: *In the Matter of the Emergency Petition of Minnesota Power for Approval to Recover Asset-Based Wholesale Margins in Fuel Adjustment Clause and Resolve Rate Case*
Docket No. E015/M-20-429

In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates In Minnesota
Docket No. E015/GR-19-442
OAH Docket No. 8-2500-36575

Dear Mr. Seuffert:

Enclosed for filing, please find Minnesota Power's Reply Comments in the above-referenced dockets. If you have any questions regarding this filing, please contact me at (218) 723-3963 or dmoeller@allete.com.

Sincerely,

David R. Moeller
Senior Attorney and
Director of Regulatory Compliance

Enclosure
cc: Attached Service Lists

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Emergency Petition of
Minnesota Power for Approval to Move
Asset-Based Wholesale Sales Credits to the
Fuel Adjustment Clause and Resolve Rate
Case

Docket No. E015/M-20-429

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

Docket No. E015/GR-19-442

REPLY COMMENTS

INTRODUCTION

Minnesota Power (or the “Company”) submits these reply comments to address the initial comments filed by the Department of Commerce, Division of Energy Resources (“Department”), Office of Attorney General – Residential Utilities Division (“OAG”), Large Power Intervenors (“LPI”), Clean Energy Organizations (“CEOs”),¹ Walmart, Citizens Utility Board of Minnesota (“CUB”), and the Energy CENTS Coalition (“Energy CENTS”) regarding the Company’s April 23, 2020 petition (“Petition”) to move recovery of asset-based wholesale margin credits (“Margin Credits”) from base rates to the fuel adjustment clause (“FAC”). Shifting recovery of Margin Credits to the FAC addresses a key driver of the Company’s current rate case (Docket No. E015/GR-19-442) and will allow the Company to withdraw this rate case and refund interim rates for the benefit of customers.

Minnesota Power is grateful for the timely and constructive feedback by parties on the Company’s Petition and proposed rate case resolution. The COVID-19 pandemic has changed many aspects of life,² and Minnesota Power wishes to thank parties for their willingness to engage on these important issues and to thank the Minnesota Public Utilities Commission (“Commission”) Staff for quickly issuing a notice and comment period and accommodating a shortened review

¹ CEOs include: Fresh Energy, Minnesota Center for Environmental Advocacy, Sierra Club, and Clean Grid Alliance.

² See Minn. Exec. No. 20-58 (Walz), *Emergency Executive Order 20-58 Authorizing the Minnesota Public Utilities Commission to Hold Remote Meetings as Necessary to Protect Health and Safety* (May 15, 2020).

period for this Petition. The Company is also pleased that a majority of the parties filed comments in support of the Company's Petition and recognize the value to customers and stakeholders of an overall resolution of the rate case and the refund of interim rates in these uncertain times.

REPLY COMMENTS

A. Party Support for Petition

The Department, CEOs, Walmart, CUB, and Energy CENTS each filed comments supporting Commission approval of the Company's Petition. Each of these parties highlight important benefits of the Company's proposal and acknowledge that this resolution is more constructive than continuing with the current rate case proceeding, particularly under present circumstances. In particular, Minnesota Power appreciates the thorough and thoughtful comments filed by the Department that provide further support for the reasonableness of each aspect of the Company's Petition.

In addition to supporting the overall Petition, CUB and Energy CENTS requested that the Commission's order include three conditions related to further updates to the Company's cost of service study, providing intervenor compensation for rate case participants, and tracking related to residential late fees. The Company has discussed these proposals with CUB and Energy CENTS and has no objections to inclusion of these conditions in the Commission's order in this matter.

The only two other parties that filed comments on the Company's Petition were the OAG and LPI. The OAG's comments neither support nor oppose the Petition, but instead focus on documenting its view of the advantages and disadvantages of the proposal and concludes that the Petition should only be approved if there is a reallocation of the cost of the Energy-Intensive Trade Exposed ("EITE") rate among the rate classes. On the opposite end of the spectrum, LPI opposes the Petition because it leaves the current expiration date for the EITE rate unchanged from the existing letter agreements and does not address rate design issues for large power customers. Minnesota Power addresses the issues raised by these two parties below.

B. Transferring Margin Credits From Base Rates to the FAC

While acknowledging that the Petition would provide customers with rate relief and near-term rate stability, mitigate pandemic-related administrative challenges, and reasonably defer certain resource-intensive issues, the OAG criticizes the Company's proposal to move Margin Credit recovery from base rates to the FAC because it results in a cost increase. What the OAG

does not address, however, is that the Company is forgoing the opportunity to recover all other increased costs and lost revenues that the Company has incurred since its 2016 rate case (Docket No. E015/GR-16-664). This is a substantial consideration that should not be ignored when evaluating the reasonableness of the Petition. As the Department concluded, after working through various possible outcomes, “it is likely that not only would ratepayers as a whole be better off under the Resolution Proposal versus continuing with the 2019 Rate Case, but each customer class individually would be better off.”³

The OAG further expresses concern about moving Margin Credits to the FAC because the amount of the credits could be reduced “without the rigorous scrutiny of a rate case.”⁴ OAG argues that rates could go up, overall, if margin credits decline in the future. This critique overlooks that Margin Credits can move in both directions, as well as the thorough review provided by stakeholders in the FAC docket related to both a utility’s annual FAC forecast filing and its annual true-up filing. Both of these filings are scrutinized by way of multiple rounds of comments before being brought to the Commission for additional evaluation.⁵ Moreover, the Commission has recently re-established that the FAC is an appropriate mechanism for the recovery of variable costs to the Company. And as discussed in the Petition, the Commission has affirmatively allowed the inclusion of Margin Credits in the FAC of other utilities, underscoring that the scrutiny in the FAC proceedings is robust and reasonable for these types of costs.⁶

C. Energy-Intensive Trade Exposed (“EITE”) Rate

In its Petition, the Company proposed to maintain the EITE rate to February 1, 2021, consistent with the Commission’s March 17, 2020 Order in the EITE docket and the natural expiration of the applicable letter agreements.⁷ Overall, this proposal was intended to largely maintain the status quo with respect to EITE during the pendency of this Petition proceeding.

³ Comments of the Department at 6.

⁴ Comments of the OAG at 15.

⁵ *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E-999/CI-03-802, ORDER APPROVING NEW ANNUAL FUEL CLAUSE ADJUSTMENT REQUIREMENTS AND SETTING FILING REQUIREMENTS (Dec. 19, 2017); *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E-999/CI-03-802, ORDER REVISING IMPLEMENTATION DATE, ESTABLISHING PROCEDURAL REQUIREMENTS, AND VARYING RULE (Dec. 12, 2018).

⁶ Petition at 13-14.

⁷ *In the Matter of Minnesota Power’s Revised Petition for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider*, Docket No. E015/M-16-564, ORDER APPROVING RIDER EXTENSION WITH CONDITIONS at 1 (Mar. 17, 2020).

However, both the OAG and LPI take issue with this proposal, albeit through competing alternatives. While LPI requests an extension of the EITE rate until final rates are implemented in the Minnesota Power's next general rate case,⁸ the OAG seeks to avoid continuation of the EITE rate unless there is a reallocation of the cost of the EITE rate among the rate classes.⁹ These proposals by LPI and OAG highlight the complicated nature of EITE and the opposing interests of various stakeholders on its future. Given this, and in an effort to reach consensus¹⁰ amongst the parties to the extent possible, Minnesota Power decided not to propose any changes to EITE in its Petition and return to what was initially approved when the Commission established the overall EITE rate and surcharge.¹¹ Minnesota Power does not propose to incorporate the EITE discount into base rates as claimed by the OAG but, rather, continues the EITE energy charge credit as a separate line on eligible customer bills. Further, it should be noted that the OAG's reallocation proposal is inconsistent with the EITE statute on competitive rates.

However, as noted in the Company's Petition, maintaining the status quo does not foreclose the ability of other parties to propose a modification or extension of the EITE rate beyond February 1, 2021 in the EITE docket (Docket No. E015/M-16-564). In fact, the competing positions of the OAG and LPI on the EITE rate and surcharge highlight the reasonableness of maintaining the status quo for purposes of this Petition, and the appropriateness of addressing this discrete issue separately from the Company's Petition.

D. Rate Design Issues

The Company's Petition also includes a proposal to continue to work with stakeholders to identify and evaluate revenue neutral, residential rate design options in the Company's time-of-day docket (Docket No. E015/M-12-233). In their comments, LPI asks the Commission to expand the scope of this docket to include an evaluation of an updated time-of-use ("TOU") or other rate design options for Large Light & Power ("LLP") customers.¹² Minnesota Power is not opposed

⁸ LPI Initial Comment at 12.

⁹ Comments of the OAG at 17-19.

¹⁰ It is difficult to reach consensus on issues related to EITE as evidenced by the multiple appeals that resulted from prior EITE decisions. *See In the Matter of the Application of Minnesota Power for Auth. to Increase Rates for Elec. Serv. in the State of Minn.*, A19-0348 (Minn. Ct. App. Nov. 12, 2019) *review denied* Jan. 20, 2020; *In the Matter of the Application of Minnesota Power for Auth. to Increase Rates for Elec. Serv. in the State of Minn.*, 929 N.W.2d 1 (Minn. Ct. App. May 6, 2019) *review denied* Aug. 6, 2019.

¹¹ *In the Matter of Minnesota Power's Revised Petition for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider*, Docket No. E015/M-16-564, ORDER APPROVING RIDER EXTENSION WITH CONDITIONS at 1-2 (Mar. 17, 2020).

¹² LPI Initial Comment at 10.

to working in good faith with its LLP customers on rate design issues, but the current time-of-day docket is not the appropriate forum for such a discussion. This docket is focused solely on residential rate design issues that would be revenue neutral within the residential class, and is sufficiently complex without expanding the scope to include new rate design proposals for other rate classes.

E. Proposed Tariff Changes

As stated in the Company's Petition, moving Margin Credits from base rates to the FAC will also require minor changes to Minnesota Power's tariff. Minnesota Power had originally proposed to include these tariff changes in a future compliance filing. However, in light of LPI's request for the opportunity to review these changes prior to the Commission agenda meeting,¹³ the Company is providing its proposed tariff changes at this time. Redlined and clean versions of the affected pages of Minnesota Power's Electric Rate Book are provided as **Attachment A** to these reply comments. Additionally, a summary of present and proposed final rates is provided as **Attachment B** and the summary comparison of operating revenues for final general rates is provided as **Attachment C**.

F. Interim Rate Refund

If this Petition is ultimately approved, the Company is prepared to submit a compliance filing that includes an interim rate refund plan within a few days of a Commission decision on the Petition. Minnesota Power requests timely approval of the refund plan to facilitate implementation of the Petition and to return interim revenues to customers as quickly as possible upon final, non-appealable approval from the Commission. While Minnesota Power retains an obligation to assure its continued financial health and ability to serve its customers, the Company also welcomes the opportunity to provide further timely interim rate relief to customers during this difficult time.

At a high level, the interim rate refund plan will lay out the methodology to return all interim rates collected from customers from January 1, 2020 through April 30, 2020, along with interest calculated using the prime rate. For the time period from May 1, 2020 until final rate implementation following Commission approval of the Petition, the methodology will include calculating the net amount of removing the \$35.8 million of Margin Credits from base rates with the actual Margin Credits for this time period and comparing this to the 4.1 percent interim rates

¹³ LPI Initial Comment at 10.

that were collected over this period. Any over- or under- collection would be included in the interim rate refund.

CONCLUSION

Minnesota Power appreciates parties' thorough review of the Company's proposal and respectfully requests that the Commission approve its Petition to move recovery of Margin Credits to the Company's FAC.

May 18, 2020

Respectfully submitted,

MINNESOTA POWER

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ATTORNEYS FOR MINNESOTA POWER

ATTACHMENT A

**REDLINE AND CLEAN VERSIONS OF AFFECTED PAGES OF
MINNESOTA POWER'S ELECTRIC RATE BOOK**

REDLINE TARIFF PAGES

RESIDENTIAL SERVICE

RATE CODES

Residential - General	20
Residential - Space Heating	22
Residential - Seasonal	23

APPLICATION

To electric service for all domestic uses for residential customers in single-family dwellings subject to Company's Residential Service Rules, Extension Rules, Electric Service Regulations and any applicable Riders. There is a maximum of one Residential – General or Residential – Space Heating service per customer. Any additional residence shall be provided service at Residential - Seasonal rate.

A dwelling will be considered to be occupied seasonally when occupied as customer's principal dwelling place for eight months or less each year.

TYPE OF SERVICE

Single phase, 60 hertz, at 120 to 120/240 volts, supplied through one meter at one point of delivery.

RATE (Monthly)

	<u>General & Space Heating</u>	<u>Seasonal</u>
Service Charge	\$8.00	\$10.00
0 kWh to 400 kWh	5.272 <u>5.911</u> ¢	
401 kWh to 800 kWh	7.616 <u>8.255</u> ¢	
801 kWh to 1,200 kWh	9.962 <u>10.601</u> ¢	
Over 1,200 kWh	12.502 <u>13.141</u> ¢	
All kWh (¢/kWh)		8.702 <u>9.341</u> ¢

Plus any applicable Adjustments.

MINIMUM CHARGE

The Minimum Charge (monthly) shall be the Service Charge plus any applicable Adjustments.

In the case of Seasonal Service, the Minimum Charge (annually) shall not be less than the guaranteed annual revenue based on Company's Extension Rules.

Filing Date November 1, 2019 April 23, 2020 MPUC Docket No. E015/GR-19-442
Effective Date January 1, 2020 July 1, 2020 Order Date December 23, 2019

Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RESIDENTIAL SERVICE

ADJUSTMENTS

~~1.~~ The following Interim Adjustment shall be applied to billings for electric service:

~~There shall also be added an Interim Rate Adjustment equal to 5.80% of the billing for electric service.~~

~~2.1.~~ There shall be added to or deducted from the monthly billing, as computed above, a fuel and purchased energy adjustment determined in accordance with the Rider for Fuel and Purchased Energy Adjustment.

~~3.2.~~ There shall be added to the monthly bill, as computed above, a transmission investment adjustment determined in accordance with the Rider for Transmission Cost Recovery.

~~4.3.~~ There shall be added to the monthly bill, as computed above, a renewable resources adjustment determined in accordance with the Rider for Renewable Resources.

~~5.4.~~ There shall be added to the monthly bill, as computed above, a conservation program adjustment determined in accordance with the Rider for Conservation Program Adjustment. The combination of the fuel adjustment and the Conservation Program Adjustment shall be shown on customer's bill as the Resource Adjustment.

~~6.5.~~ There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Rider for Customer Affordability of Residential Electricity (CARE).

~~7.6.~~ There shall be added to the monthly bill, as computed above, an emissions-reduction adjustment determined in accordance with the Rider for Boswell Unit 4 Emission Reduction.

~~8.7.~~ There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.

~~9.8.~~ Plus the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.

~~10.9.~~ Bills for service within the corporate limits of the applicable city shall include an upward adjustment as specified in the applicable Rider for the city's Franchise Fee.

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RESIDENTIAL SERVICE

PAYMENT

Bills are due and payable 25 days following the date the bill is rendered or such later date as may be specified on the bill.

CONTRACT PERIOD

Not less than thirty days or such longer period as may be required under an Electric Service Agreement.

For Seasonal Residential Service, the initial contract period is one year or such longer period as may be required under an extension agreement, with one year renewal periods.

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LARGE POWER SERVICE

RATE CODES

74

APPLICATION

The Large Power Service Schedule ("LP Schedule") applies to electric service delivered from existing Company facilities of adequate type and capacity, where Customer and Company have executed an Electric Service Agreement ("ESA") agreeing to the purchase and sale of Large Power Service and supplementing the terms and conditions of Large Power Service set forth in this LP Schedule.

Service under this LP Schedule is also subject to Company's Electric Service Regulations as well as all riders and other tariffs applicable to Large Power Service.

Customer shall not be entitled to purchase any service from the Company under this LP Schedule for purposes of resale to any other entity or to the Company.

ELECTRIC SERVICE AGREEMENTS

Every ESA and every amendment or modification of an ESA must be approved by the Minnesota Public Utilities Commission ("Commission") as a supplemental addition to this LP Schedule.

At a minimum, every ESA shall include the following:

- (a) The connection point(s) of Company's and Customer's equipment at which Customer takes service ("Points of Delivery");
- (b) The voltage level(s) at which service will be supplied;
- (c) A method for determining Firm Demand (as defined below) in each month of the term of the ESA;
- (d) An Incremental Production Service Threshold as defined in the Rider for Large Power Incremental Production Service, as applicable;
- (e) A confidentiality agreement; and
- (f) Any terms or conditions that differ from or are additional to the terms and conditions specified in this LP Schedule or in any rider or tariff applicable to Large Power Service.

Unless otherwise specifically approved by the Commission, each ESA shall have an initial minimum term of ten (10) years and shall continue in force until either party gives the other party written notice of cancellation at least four years prior to the time such cancellation shall be effective.

The effective date of each ESA shall be subject to approval by the Commission.

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LARGE POWER SERVICE

No Commission approval of any ESA shall act to prevent the Commission from later increasing or decreasing any of the rates or charges contained in this LP Schedule, any Rider or any other tariff applicable to Large Power Service. Nor shall any Commission approval of any ESA exempt any Customer from the applicability of any such increased or decreased charges.

An ESA shall be binding upon the Company and the Customer and their successors and assigns, on and after the effective date of the ESA; provided, however, that neither party may assign that ESA or any rights or obligations under the ESA without the prior written consent of the other party, which consent shall not unreasonably be withheld.

Inasmuch as all ESAs will contain confidential information with respect to Customer electric usage levels and other proprietary information of both the Customer and the Company ("Confidential Information"), all ESAs are to be marked as trade secret in their entirety for purposes of the Minnesota Government Data Practices Act. For this purpose, Confidential Information includes all disclosures, information and materials, whether oral, written, electronic or otherwise, relating to the business of either the Customer or the Company, that is not generally available to the trade or the public. The ESA may specifically expand this definition to ensure Customer-specific and/or Company-specific protections are in place. Because use and disclosure of Confidential Information requires a written agreement, the Company and the Customer will agree to such use and disclosure in each ESA.

For purposes of ESAs capitalized terms used in this LP Schedule shall have the same meaning as capitalized terms in the ESA.

For purposes of ESAs, the term "Holidays" shall mean New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Christmas Eve Day, Christmas Day, and New Year's Eve Day.

For purposes of ESAs, the term "Office" shall mean the Minnesota Office of Energy Security or its successor organization.

TYPE OF SERVICE

Unless otherwise agreed in an ESA, Large Power Service shall be three phase, 60 hertz, at Company's available transmission voltage of at least 115,000 volts. Customer may specifically request to take all or any portion of its Large Power Service at Company's available high voltage of 13,000 through 69,000 volts, and such lower voltage deliveries may be subject to a Service Voltage Adjustment as described below.

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LARGE POWER SERVICE

BASE RATES (MONTHLY)

The following charges (as modified by the Adjustments described below) shall apply to all service under this LP Schedule and the ESAs (collectively, the "Base Rates"):

Demand Charge

A single application for the first 10,000 kW or less of Firm Demand \$250,087

All additional kW of Firm Demand (\$/kW) \$24.96

Energy Charge

All Firm Energy kWh (¢/kWh) (All On-Peak and Off-Peak) ~~0.678¢~~ 1.041¢

Excess Energy Charge

All kWh of Excess Energy shall be billed at 110% of the Company's Incremental Energy Cost as described more fully in paragraphs 2 and 3 under "ENERGY."

ADJUSTMENTS

Company may modify Base Rates by the following adjustments:

~~1. The following Interim Adjustment shall be applied to billings for electric service:~~

~~There shall also be added an Interim Rate Adjustment equal to 5.80% of the billing for electric service.~~

~~2.1.~~ Service Voltage Adjustment. Unless otherwise agreed in the ESA, where service delivery voltage is at Company's available high voltage of 13,000 through 69,000 volts, Company will increase the Demand Charge by \$1.75 per kW of Firm Demand for that portion of Firm Demand taken at 13,000 through 69,000 volts.

~~3.2.~~ Fuel and Purchased Energy Adjustment. A fuel and purchased energy adjustment will be determined in accordance with the Rider for Fuel and Purchased Energy Adjustment and a conservation program

~~4.3.~~ Conservation Adjustment. Adjustment will be determined in accordance with the Rider for Conservation Program Adjustment.

~~5.4.~~ Transmission Adjustment. A transmission investment adjustment will be determined in accordance with the Rider for Transmission Cost Recovery.

~~6.5.~~ Renewable Resource Adjustment. A renewable resources adjustment will be determined in accordance with the Rider for Renewable Resources.

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LARGE POWER SERVICE

~~7.6.~~ CARE Low-Income Affordability Program Surcharge: There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Pilot Rider for Customer Affordability of Residential Electricity (CARE).

~~8.7.~~ Boswell 4 Plan Adjustment: There shall be added to the monthly bill, as computed above, an emissions-reduction adjustment determined in accordance with the Rider for Boswell Unit 4 Emission Reduction.

~~9.8.~~ Solar Energy Adjustment: There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.

~~10.9.~~ Taxes and Assessments. An adjustment for the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.

~~11.10.~~ Franchise Fee. An adjustment for customers located within the corporate limits of the applicable city as specified in the applicable Rider for the city's Franchise Fee.

MEASURED AND ADJUSTED DEMAND

The measured demand ("Measured Demand") in the month shall be the sum of kW measured from all of the Points of Delivery specified in the ESA during the 15-minute period of Customer's greatest use during the month.

The adjusted demand ("Adjusted Demand") in the month shall be the Measured Demand increased by one kilowatt for each 20 kvar of excess reactive demand. Excess reactive demand means the amount by which the maximum 15-minute measured kvar during the month exceeds 50% of the first 20,000 kW of Measured Demand plus 25% of all additional kW of Measured Demand.

This provision shall supersede all references to Metered Demand, Measured Demand, and Adjusted Demand in the Customers' ESAs.

DEMAND

1. Firm Demand. The Customer's ESA specifies the amount of Firm Demand in any billing month. In general, the Firm Demand will be based on amount specified, selected, nominated, determined or agreed upon in the Customer's ESA. Regardless of how the ESA describes or calculates the Customer's contractual demand in any billing month for purposes of applying the Demand Charge, this amount shall be deemed to be the Customer's Firm Demand for purposes of this LP Schedule and the application of the Demand Charge.

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2. Demands in Excess of Firm Demand. Company will endeavor to serve Customer requirements for power in excess of Firm Demand, but Company has no responsibility or liability whatsoever for failing to provide any power in excess of Firm Demand.

DEMAND NOMINATIONS

1. Demand Nomination increases. For all Customers who notify the Company periodically throughout the year per the terms of their respective ESAs, need to be made by the last business day excluding weekends and Holidays prior to the nominating deadlines specified in the Customers' ESAs. This provision shall supersede all references to all language in Customers' ESAs relating to nomination notice deadlines.

ENERGY

1. Firm Energy. Firm Energy shall mean the total electric consumption of the Customer measured in kilowatt-hours ("kWh") in each hour of the billing month, regardless of whether it is taken during peak or off peak hours, but limited to no more than the Customer's Firm Demand in any hour. In general, the amount of Firm Energy billed in each hour of the billing month will be equal to the amount of Firm Demand in that month unless modified by terms in the Customer's ESA.

2. Excess Energy. Excess Energy shall be the kWh of energy taken by Customer in each hour of the month in excess of the allowable Firm Energy levels specified in the Customer's ESA in that hour, unless the Customer takes such energy under the Rider for Large Power Incremental Production Service or another Rider applicable to Large Power Service and available to the Customer pursuant to its ESA.

3. Excess Energy shall be billed at 110% of the Company's Incremental Energy Cost in month. Company's Incremental Energy Cost shall be determined each hour of the month and shall include fuel costs and variable operation and maintenance expenses for generating or purchasing the excess energy. Company's Incremental Energy Cost will be the highest cost energy after assigning lower cost energy to: all firm retail and wholesale customer requirements; all intersystem (pool) sales that involve capacity on a firm or participation basis; and all interruptible sales to Large Power, Large Light and Power, and General Service customers; but not including sales for Incremental Production Service.

PAYMENT

All bills for Large Power Service are due and payable at any office of Minnesota Power 15 days following the date the Company renders the bill or such later date as may be specified on the bill unless the Customer is subject to the Rider for Expedited Billing Procedures—Large Power Class or Customer specifically agrees to be subject to the Rider for Expedited Billing Procedures—Large Power Class in the ESA. Payments must be received by Minnesota Power on or before such due date and shall not be considered as

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LARGE POWER SERVICE

payment received until the funds are usable or collectible by Minnesota Power. If Company does not receive payment on or before the due date printed on the bill, the bill shall be past due and delinquent.

LARGE POWER SURCHARGE

For new customers with Firm Demand in excess of 50,000 kW in any twenty-four month period, or for existing customers with increases in Firm Demand of more than 50,000 kW in any twenty-four month period, the additional Firm Demand in excess of 50,000 kW will be subject to a Large Power Surcharge. The Company will assess the Large Power Surcharge for a period of five years from the date the Customer executes a binding Commitment Agreement to take the power. The Large Power Surcharge will cover the additional cost to Company of obtaining the necessary power supply. The Large Power Surcharge shall be the sum of a Capacity Portion and Energy Portion as described below. If the sum is negative then the Large Power Surcharge shall be zero.

Capacity Portion

For each kW of Firm Demand subject to surcharge Company shall add to the Demand Charge the excess of Company's Large Power Surcharge Supply Capacity Costs per kW over Company's Basic Capacity Cost. Company's Large Power Surcharge Supply Capacity Costs per kW will be: 1) Company's cost per kW as purchased from its power suppliers with appropriate adjustments for reserve requirements/replacement power, transmission losses and coincidence factor; 2) The Company's estimated annual Revenue Requirements per kW associated with Company's power production facilities added or refurbished to supply the power; or 3) A blend of the above costs if more than one source is used to supply the power. Company's Basic Capacity Costs per kW will be Company's estimated annual Revenue Requirements associated with Company-owned power production facilities and with Company firm power purchases, exclusive of the estimated annual Revenue Requirements associated with any such purchases or Company-owned power facilities which are covered by a Large Power Surcharge, divided by the aggregate coincidental kilowatts of all customer loads serviced by such generating capacity and purchased capacity, adjusted for estimated transmission losses and load coincidence factor.

Company will advise Customer of the Large Power Surcharge Supply Capacity Costs as soon the Company has made arrangements for the capacity and Company will advise Customer of the Company's Basic Capacity Costs 30 days prior to the beginning of each calendar year in which the surcharge may be applied.

Energy Portion

For each kWh delivered to Customer subject to surcharge, Company shall add to the Energy Charge the excess of Company's Actual Large Power Surcharge Supply Energy Costs per kWh over the Company's Basic Energy Costs.

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Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

LARGE POWER SERVICE

Company's Actual Large Power Surcharge Supply Energy Costs per kWh will be determined monthly as Company's actual cost per kWh for the energy: 1) Generated by and associated with the Purchased Capacity, adjusted for estimated transmission losses; 2) Generated by and associated with Company's power production facilities added or refurbished to supply the power; or 3) A blend of the above costs if more than one source is used to supply the power. Company's Basic Energy Costs per kWh will be Company's estimated annual Revenue Requirements for fuel and associated operation and maintenance expenses at Company-owned power production facilities, and for energy associated with firm power purchases and economy purchases (but exclusive of all emergency and scheduled outage energy, and exclusive of any energy associated with Purchased Capacity and exclusive of energy provided by Company-owned power facilities covered by a Large Power Surcharge) divided by the aggregate associated kilowatt-hours, adjusted for estimated transmission losses.

Company will advise Customer of the approximate Large Power Surcharge Supply Energy Costs and Company's Basic Energy Costs 30 days prior to the beginning of each calendar year in which the surcharge may be applied.

Where the above surcharge is applicable to only a portion of the electric service taken at one point of delivery, the kWh subject to surcharge shall be the total kWh delivered in the month multiplied by the ratio of the Capacity subject to surcharge over the total Firm Demand at that point of delivery.

OPERATING PRACTICES

The Company shall employ operating practices and standards of performance in providing service under this LP Schedule that conform to those recognized as sound practices within the utility industry. In making deliveries of power under this LP Schedule, Company shall exercise such care as is consistent with normal operating practice by using all available facilities to minimize and smooth out the effects of sudden load fluctuations or other variance in voltage or current characteristics that may be detrimental to Customer's operations.

Filing Date ~~November 1, 2019~~ April 23, 2020 MPUC Docket No. E015/GR-19-442
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Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

APPLICATION

Applicable to electric service under all Company's Retail Rate Schedules except Competitive Rate Schedules Rate Codes 73 and 79.

FUEL AND PURCHASED ENERGY CHARGE

The Forecasted System Average Fuel and Purchased Energy (FPE) Charge for each month shall be the forecasted FPE Charge for the current month divided by the forecasted Kilowatt-Hour Sales. The applicable Forecasted FPE Charge shall be added to customers' monthly bill according to each customer's rate class and class cost factor.

In addition, subject to Commission approval, there shall be an annual true-up for any amount collected over or under the actual cost of energy for the twelve months ending December 31 of each year as reported in the Annual Automatic Adjustment True-up report to be filed by March 1 following the most recent reporting period. The annual true-up shall be based on a historic twelve-month period, comparing actual costs to the forecasted costs and shall be applied to the subsequent twelve months. The annual true-up will be effective on billings beginning the first of the month following Commission approval of the true-up, or as ordered by the Commission. In years when the over- or under- recovery amount is small (resulting in a true-up rate rounded to less than 0.001¢), the true-up balance will carry over to the next year's true-up.

The annual true-up rate for each rate class shall be calculated as follows. The over- or under- recovery amount as shown in the current year Annual Automatic Adjustment True-up report will be divided by the forecasted Kilowatt-Hours subject to the fuel adjustment clause for the proposed twelve month recovery period the true-up rate will be in effect and then multiplied by the applicable Class Cost Factor. This calculation will produce a true-up rate per Kilowatt-Hour (rounded to the nearest 0.001¢) for each rate class that will be applied to Customers' bills in the same manner as the forecasted monthly FPE Charge.

FORECASTED SYSTEM AVERAGE FUEL AND PURCHASED ENERGY CHARGE

The monthly Forecasted Average Fuel and Purchased Energy Charge shall be the **sum** of the following:

- (a) The fossil and nuclear fuel forecasted to be consumed in Company's generating stations,
- (b) The forecasted net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when

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Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

such energy is to be purchased on an economic dispatch basis, this encompasses energy being purchased to substitute for Company's own higher cost energy,

- (c) The forecasted identifiable fossil and nuclear fuel costs associated with energy purchased for reasons other than identified in (b) above,
- (d) The forecasted cost of steam from other sources to be used in the generation of electricity at the Company's generating stations,
- (e) The forecasted cost of the Released Energy Credit to be paid to Customer(s) for avoided energy purchases under the Rider for Released Energy,
- (f) The forecasted cost of the Buyback Energy Credit to be paid to Customer(s) for avoided energy purchases under the Rider for Voluntary Energy Buyback,
- (g) Forecasted fuel and purchased energy expenses to be incurred by the Company over the duration of any Commission approved contract, as provided for by Minnesota Statutes, Section 216B.1645, to satisfy the renewable energy obligations set forth in Minnesota Statutes, Section 216B.1691 excluding the cost of fuel and purchased energy related to meeting the Solar Energy Standard,
- (h) All forecasted RTO (Regional Transmission Organization) energy market costs net of revenues, excluding administrative costs,
- (i) The forecasted cost of the purchase of SO₂ allowances,
- (j) The forecasted Time of Generation Adjustment as calculated in the Rider for Solar Energy Adjustment

and **less**

- (k) Forecasted revenues from the sale of SO₂ allowances,
- (l) The forecasted cost of fossil and nuclear fuel and the cost of steam from other sources recovered through inter-system sales including the fuel and steam costs related to economy energy sales and other energy sold on an economic dispatch basis, ~~and~~
- (m) Forecasted net revenues from the sale of environmental attributes from any Commission approved contract ~~and~~

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David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

(n) Forecasted net revenues (margins) from asset-based wholesale energy and capacity sales.

The Forecasted Kilowatt-Hour Sales shall be Company's total forecasted kilowatt-hour Sales of Electricity, excluding inter-system sales referred to in (l) above and solar energy production and purchases referred to in (g) above.

CLASS COST FACTORS

A separate Class Cost Factor shall be applied to calculate the Forecasted FPE Charge for each Rate Class.

Rate Class	Class Cost Factor
Residential	1.01406
General Service	1.03518
Large Light & Power	1.00982
Large Power	0.99024
Municipal Pumping	1.01571
Lighting	0.82572

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David R. Moeller
Senior Attorney & Director of Regulatory Compliance

CLEAN TARIFF PAGES

RESIDENTIAL SERVICE

RATE CODES

Residential - General	20
Residential - Space Heating	22
Residential - Seasonal	23

APPLICATION

To electric service for all domestic uses for residential customers in single-family dwellings subject to Company's Residential Service Rules, Extension Rules, Electric Service Regulations and any applicable Riders. There is a maximum of one Residential – General or Residential – Space Heating service per customer. Any additional residence shall be provided service at Residential - Seasonal rate.

A dwelling will be considered to be occupied seasonally when occupied as customer's principal dwelling place for eight months or less each year.

TYPE OF SERVICE

Single phase, 60 hertz, at 120 to 120/240 volts, supplied through one meter at one point of delivery.

RATE (Monthly)

	General & Space Heating	Seasonal
Service Charge	\$8.00	\$10.00
0 kWh to 400 kWh	5.911¢	
401 kWh to 800 kWh	8.255¢	
801 kWh to 1,200 kWh	10.601¢	
Over 1,200 kWh	13.141¢	
All kWh (¢/kWh)		9.341¢

Plus any applicable Adjustments.

MINIMUM CHARGE

The Minimum Charge (monthly) shall be the Service Charge plus any applicable Adjustments.

In the case of Seasonal Service, the Minimum Charge (annually) shall not be less than the guaranteed annual revenue based on Company's Extension Rules.

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Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RESIDENTIAL SERVICE

ADJUSTMENTS

1. There shall be added to or deducted from the monthly billing, as computed above, a fuel and purchased energy adjustment determined in accordance with the Rider for Fuel and Purchased Energy Adjustment.

2. There shall be added to the monthly bill, as computed above, a transmission investment adjustment determined in accordance with the Rider for Transmission Cost Recovery.

3. There shall be added to the monthly bill, as computed above, a renewable resources adjustment determined in accordance with the Rider for Renewable Resources.

4. There shall be added to the monthly bill, as computed above, a conservation program adjustment determined in accordance with the Rider for Conservation Program Adjustment. The combination of the fuel adjustment and the Conservation Program Adjustment shall be shown on customer's bill as the Resource Adjustment.

5. There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Rider for Customer Affordability of Residential Electricity (CARE).

6. There shall be added to the monthly bill, as computed above, an emissions-reduction adjustment determined in accordance with the Rider for Boswell Unit 4 Emission Reduction.

7. There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.

8. Plus the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.

9. Bills for service within the corporate limits of the applicable city shall include an upward adjustment as specified in the applicable Rider for the city's Franchise Fee.

PAYMENT

Bills are due and payable 25 days following the date the bill is rendered or such later date as may be specified on the bill.

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David R. Moeller
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RESIDENTIAL SERVICE

CONTRACT PERIOD

Not less than thirty days or such longer period as may be required under an Electric Service Agreement.

For Seasonal Residential Service, the initial contract period is one year or such longer period as may be required under an extension agreement, with one year renewal periods.

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Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

LARGE POWER SERVICE

RATE CODES

74

APPLICATION

The Large Power Service Schedule ("LP Schedule") applies to electric service delivered from existing Company facilities of adequate type and capacity, where Customer and Company have executed an Electric Service Agreement ("ESA") agreeing to the purchase and sale of Large Power Service and supplementing the terms and conditions of Large Power Service set forth in this LP Schedule.

Service under this LP Schedule is also subject to Company's Electric Service Regulations as well as all riders and other tariffs applicable to Large Power Service.

Customer shall not be entitled to purchase any service from the Company under this LP Schedule for purposes of resale to any other entity or to the Company.

ELECTRIC SERVICE AGREEMENTS

Every ESA and every amendment or modification of an ESA must be approved by the Minnesota Public Utilities Commission ("Commission") as a supplemental addition to this LP Schedule.

At a minimum, every ESA shall include the following:

- (a) The connection point(s) of Company's and Customer's equipment at which Customer takes service ("Points of Delivery");
- (b) The voltage level(s) at which service will be supplied;
- (c) A method for determining Firm Demand (as defined below) in each month of the term of the ESA;
- (d) An Incremental Production Service Threshold as defined in the Rider for Large Power Incremental Production Service, as applicable;
- (e) A confidentiality agreement; and
- (f) Any terms or conditions that differ from or are additional to the terms and conditions specified in this LP Schedule or in any rider or tariff applicable to Large Power Service.

Unless otherwise specifically approved by the Commission, each ESA shall have an initial minimum term of ten (10) years and shall continue in force until either party gives the other party written notice of cancellation at least four years prior to the time such cancellation shall be effective.

The effective date of each ESA shall be subject to approval by the Commission.

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LARGE POWER SERVICE

No Commission approval of any ESA shall act to prevent the Commission from later increasing or decreasing any of the rates or charges contained in this LP Schedule, any Rider or any other tariff applicable to Large Power Service. Nor shall any Commission approval of any ESA exempt any Customer from the applicability of any such increased or decreased charges.

An ESA shall be binding upon the Company and the Customer and their successors and assigns, on and after the effective date of the ESA; provided, however, that neither party may assign that ESA or any rights or obligations under the ESA without the prior written consent of the other party, which consent shall not unreasonably be withheld.

Inasmuch as all ESAs will contain confidential information with respect to Customer electric usage levels and other proprietary information of both the Customer and the Company ("Confidential Information"), all ESAs are to be marked as trade secret in their entirety for purposes of the Minnesota Government Data Practices Act. For this purpose, Confidential Information includes all disclosures, information and materials, whether oral, written, electronic or otherwise, relating to the business of either the Customer or the Company, that is not generally available to the trade or the public. The ESA may specifically expand this definition to ensure Customer-specific and/or Company-specific protections are in place. Because use and disclosure of Confidential Information requires a written agreement, the Company and the Customer will agree to such use and disclosure in each ESA.

For purposes of ESAs capitalized terms used in this LP Schedule shall have the same meaning as capitalized terms in the ESA.

For purposes of ESAs, the term "Holidays" shall mean New Year's Day, Memorial Day, Independence Day, Labor Day, Thanksgiving, Christmas Eve Day, Christmas Day, and New Year's Eve Day.

For purposes of ESAs, the term "Office" shall mean the Minnesota Office of Energy Security or its successor organization.

TYPE OF SERVICE

Unless otherwise agreed in an ESA, Large Power Service shall be three phase, 60 hertz, at Company's available transmission voltage of at least 115,000 volts. Customer may specifically request to take all or any portion of its Large Power Service at Company's available high voltage of 13,000 through 69,000 volts, and such lower voltage deliveries may be subject to a Service Voltage Adjustment as described below.

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LARGE POWER SERVICE

BASE RATES (MONTHLY)

The following charges (as modified by the Adjustments described below) shall apply to all service under this LP Schedule and the ESAs (collectively, the "Base Rates"):

Demand Charge

A single application for the first 10,000 kW or less of Firm Demand \$250,087

All additional kW of Firm Demand (\$/kW) \$24.96

Energy Charge

All Firm Energy kWh (¢/kWh) (All On-Peak and Off-Peak) 1.041¢

Excess Energy Charge

All kWh of Excess Energy shall be billed at 110% of the Company's Incremental Energy Cost as described more fully in paragraphs 2 and 3 under "ENERGY."

ADJUSTMENTS

Company may modify Base Rates by the following adjustments:

1. Service Voltage Adjustment. Unless otherwise agreed in the ESA, where service delivery voltage is at Company's available high voltage of 13,000 through 69,000 volts, Company will increase the Demand Charge by \$1.75 per kW of Firm Demand for that portion of Firm Demand taken at 13,000 through 69,000 volts.

2. Fuel and Purchased Energy Adjustment. A fuel and purchased energy adjustment will be determined in accordance with the Rider for Fuel and Purchased Energy Adjustment and a conservation program

3. Conservation Adjustment. Adjustment will be determined in accordance with the Rider for Conservation Program Adjustment.

4. Transmission Adjustment. A transmission investment adjustment will be determined in accordance with the Rider for Transmission Cost Recovery.

5. Renewable Resource Adjustment. A renewable resources adjustment will be determined in accordance with the Rider for Renewable Resources.

6. CARE Low-Income Affordability Program Surcharge: There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Pilot Rider for Customer Affordability of Residential Electricity (CARE).

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Senior Attorney & Director of Regulatory Compliance

LARGE POWER SERVICE

7. Boswell 4 Plan Adjustment: There shall be added to the monthly bill, as computed above, an emissions-reduction adjustment determined in accordance with the Rider for Boswell Unit 4 Emission Reduction.

8. Solar Energy Adjustment: There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.

9. Taxes and Assessments. An adjustment for the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.

10. Franchise Fee. An adjustment for customers located within the corporate limits of the applicable city as specified in the applicable Rider for the city's Franchise Fee.

MEASURED AND ADJUSTED DEMAND

The measured demand ("Measured Demand") in the month shall be the sum of kW measured from all of the Points of Delivery specified in the ESA during the 15-minute period of Customer's greatest use during the month.

The adjusted demand ("Adjusted Demand") in the month shall be the Measured Demand increased by one kilowatt for each 20 kvar of excess reactive demand. Excess reactive demand means the amount by which the maximum 15-minute measured kvar during the month exceeds 50% of the first 20,000 kW of Measured Demand plus 25% of all additional kW of Measured Demand.

This provision shall supersede all references to Metered Demand, Measured Demand, and Adjusted Demand in the Customers' ESAs.

DEMAND

1. Firm Demand. The Customer's ESA specifies the amount of Firm Demand in any billing month. In general, the Firm Demand will be based on amount specified, selected, nominated, determined or agreed upon in the Customer's ESA. Regardless of how the ESA describes or calculates the Customer's contractual demand in any billing month for purposes of applying the Demand Charge, this amount shall be deemed to be the Customer's Firm Demand for purposes of this LP Schedule and the application of the Demand Charge.

2. Demands in Excess of Firm Demand. Company will endeavor to serve Customer requirements for power in excess of Firm Demand, but Company has no responsibility or liability whatsoever for failing to provide any power in excess of Firm Demand.

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Senior Attorney & Director of Regulatory Compliance

LARGE POWER SERVICE

DEMAND NOMINATIONS

1. Demand Nomination increases. For all Customers who notify the Company periodically throughout the year per the terms of their respective ESAs, need to be made by the last business day excluding weekends and Holidays prior to the nominating deadlines specified in the Customers' ESAs. This provision shall supersede all references to all language in Customers' ESAs relating to nomination notice deadlines.

ENERGY

1. Firm Energy. Firm Energy shall mean the total electric consumption of the Customer measured in kilowatt-hours ("kWh") in each hour of the billing month, regardless of whether it is taken during peak or off peak hours, but limited to no more than the Customer's Firm Demand in any hour. In general, the amount of Firm Energy billed in each hour of the billing month will be equal to the amount of Firm Demand in that month unless modified by terms in the Customer's ESA.

2. Excess Energy. Excess Energy shall be the kWh of energy taken by Customer in each hour of the month in excess of the allowable Firm Energy levels specified in the Customer's ESA in that hour, unless the Customer takes such energy under the Rider for Large Power Incremental Production Service or another Rider applicable to Large Power Service and available to the Customer pursuant to its ESA.

3. Excess Energy shall be billed at 110% of the Company's Incremental Energy Cost in month. Company's Incremental Energy Cost shall be determined each hour of the month and shall include fuel costs and variable operation and maintenance expenses for generating or purchasing the excess energy. Company's Incremental Energy Cost will be the highest cost energy after assigning lower cost energy to: all firm retail and wholesale customer requirements; all intersystem (pool) sales that involve capacity on a firm or participation basis; and all interruptible sales to Large Power, Large Light and Power, and General Service customers; but not including sales for Incremental Production Service.

PAYMENT

All bills for Large Power Service are due and payable at any office of Minnesota Power 15 days following the date the Company renders the bill or such later date as may be specified on the bill unless the Customer is subject to the Rider for Expedited Billing Procedures—Large Power Class or Customer specifically agrees to be subject to the Rider for Expedited Billing Procedures—Large Power Class in the ESA. Payments must be received by Minnesota Power on or before such due date and shall not be considered as payment received until the funds are usable or collectible by Minnesota Power. If Company does not receive payment on or before the due date printed on the bill, the bill shall be past due and delinquent.

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David R. Moeller
Senior Attorney & Director of Regulatory Compliance

LARGE POWER SERVICE

LARGE POWER SURCHARGE

For new customers with Firm Demand in excess of 50,000 kW in any twenty-four month period, or for existing customers with increases in Firm Demand of more than 50,000 kW in any twenty-four month period, the additional Firm Demand in excess of 50,000 kW will be subject to a Large Power Surcharge. The Company will assess the Large Power Surcharge for a period of five years from the date the Customer executes a binding Commitment Agreement to take the power. The Large Power Surcharge will cover the additional cost to Company of obtaining the necessary power supply. The Large Power Surcharge shall be the sum of a Capacity Portion and Energy Portion as described below. If the sum is negative then the Large Power Surcharge shall be zero.

Capacity Portion

For each kW of Firm Demand subject to surcharge Company shall add to the Demand Charge the excess of Company's Large Power Surcharge Supply Capacity Costs per kW over Company's Basic Capacity Cost. Company's Large Power Surcharge Supply Capacity Costs per kW will be: 1) Company's cost per kW as purchased from its power suppliers with appropriate adjustments for reserve requirements/replacement power, transmission losses and coincidence factor; 2) The Company's estimated annual Revenue Requirements per kW associated with Company's power production facilities added or refurbished to supply the power; or 3) A blend of the above costs if more than one source is used to supply the power. Company's Basic Capacity Costs per kW will be Company's estimated annual Revenue Requirements associated with Company-owned power production facilities and with Company firm power purchases, exclusive of the estimated annual Revenue Requirements associated with any such purchases or Company-owned power facilities which are covered by a Large Power Surcharge, divided by the aggregate coincidental kilowatts of all customer loads serviced by such generating capacity and purchased capacity, adjusted for estimated transmission losses and load coincidence factor.

Company will advise Customer of the Large Power Surcharge Supply Capacity Costs as soon the Company has made arrangements for the capacity and Company will advise Customer of the Company's Basic Capacity Costs 30 days prior to the beginning of each calendar year in which the surcharge may be applied.

Energy Portion

For each kWh delivered to Customer subject to surcharge, Company shall add to the Energy Charge the excess of Company's Actual Large Power Surcharge Supply Energy Costs per kWh over the Company's Basic Energy Costs.

Company's Actual Large Power Surcharge Supply Energy Costs per kWh will be determined monthly as Company's actual cost per kWh for the energy: 1) Generated by and associated with the Purchased Capacity, adjusted for estimated transmission losses; 2) Generated by and associated with Company's power production facilities added or refurbished to supply the power; or 3) A blend of the above costs if more than one source

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LARGE POWER SERVICE

is used to supply the power. Company's Basic Energy Costs per kWh will be Company's estimated annual Revenue Requirements for fuel and associated operation and maintenance expenses at Company-owned power production facilities, and for energy associated with firm power purchases and economy purchases (but exclusive of all emergency and scheduled outage energy, and exclusive of any energy associated with Purchased Capacity and exclusive of energy provided by Company-owned power facilities covered by a Large Power Surcharge) divided by the aggregate associated kilowatt-hours, adjusted for estimated transmission losses.

Company will advise Customer of the approximate Large Power Surcharge Supply Energy Costs and Company's Basic Energy Costs 30 days prior to the beginning of each calendar year in which the surcharge may be applied.

Where the above surcharge is applicable to only a portion of the electric service taken at one point of delivery, the kWh subject to surcharge shall be the total kWh delivered in the month multiplied by the ratio of the Capacity subject to surcharge over the total Firm Demand at that point of delivery.

OPERATING PRACTICES

The Company shall employ operating practices and standards of performance in providing service under this LP Schedule that conform to those recognized as sound practices within the utility industry. In making deliveries of power under this LP Schedule, Company shall exercise such care as is consistent with normal operating practice by using all available facilities to minimize and smooth out the effects of sudden load fluctuations or other variance in voltage or current characteristics that may be detrimental to Customer's operations.

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Senior Attorney & Director of Regulatory Compliance

RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

APPLICATION

Applicable to electric service under all Company's Retail Rate Schedules except Competitive Rate Schedules Rate Codes 73 and 79.

FUEL AND PURCHASED ENERGY CHARGE

The Forecasted System Average Fuel and Purchased Energy (FPE) Charge for each month shall be the forecasted FPE Charge for the current month divided by the forecasted Kilowatt-Hour Sales. The applicable Forecasted FPE Charge shall be added to customers' monthly bill according to each customer's rate class and class cost factor.

In addition, subject to Commission approval, there shall be an annual true-up for any amount collected over or under the actual cost of energy for the twelve months ending December 31 of each year as reported in the Annual Automatic Adjustment True-up report to be filed by March 1 following the most recent reporting period. The annual true-up shall be based on a historic twelve-month period, comparing actual costs to the forecasted costs and shall be applied to the subsequent twelve months. The annual true-up will be effective on billings beginning the first of the month following Commission approval of the true-up, or as ordered by the Commission. In years when the over- or under- recovery amount is small (resulting in a true-up rate rounded to less than 0.001¢), the true-up balance will carry over to the next year's true-up.

The annual true-up rate for each rate class shall be calculated as follows. The over- or under- recovery amount as shown in the current year Annual Automatic Adjustment True-up report will be divided by the forecasted Kilowatt-Hours subject to the fuel adjustment clause for the proposed twelve month recovery period the true-up rate will be in effect and then multiplied by the applicable Class Cost Factor. This calculation will produce a true-up rate per Kilowatt-Hour (rounded to the nearest 0.001¢) for each rate class that will be applied to Customers' bills in the same manner as the forecasted monthly FPE Charge.

FORECASTED SYSTEM AVERAGE FUEL AND PURCHASED ENERGY CHARGE

The monthly Forecasted Average Fuel and Purchased Energy Charge shall be the **sum** of the following:

- (a) The fossil and nuclear fuel forecasted to be consumed in Company's generating stations,
- (b) The forecasted net energy cost of energy purchases, exclusive of capacity or demand charges (irrespective of the designation assigned to such transaction) when

Filing Date: April 23, 2020 MPUC Docket No.: E015/M-20-429
Effective Date: May 1, 2020 Order Date: TBD

Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

such energy is to be purchased on an economic dispatch basis, this encompasses energy being purchased to substitute for Company's own higher cost energy,

- (c) The forecasted identifiable fossil and nuclear fuel costs associated with energy purchased for reasons other than identified in (b) above,
- (d) The forecasted cost of steam from other sources to be used in the generation of electricity at the Company's generating stations,
- (e) The forecasted cost of the Released Energy Credit to be paid to Customer(s) for avoided energy purchases under the Rider for Released Energy,
- (f) The forecasted cost of the Buyback Energy Credit to be paid to Customer(s) for avoided energy purchases under the Rider for Voluntary Energy Buyback,
- (g) Forecasted fuel and purchased energy expenses to be incurred by the Company over the duration of any Commission approved contract, as provided for by Minnesota Statutes, Section 216B.1645, to satisfy the renewable energy obligations set forth in Minnesota Statutes, Section 216B.1691 excluding the cost of fuel and purchased energy related to meeting the Solar Energy Standard,
- (h) All forecasted RTO (Regional Transmission Organization) energy market costs net of revenues, excluding administrative costs,
- (i) The forecasted cost of the purchase of SO₂ allowances,
- (j) The forecasted Time of Generation Adjustment as calculated in the Rider for Solar Energy Adjustment

and **less**

- (k) Forecasted revenues from the sale of SO₂ allowances,
- (l) The forecasted cost of fossil and nuclear fuel and the cost of steam from other sources recovered through inter-system sales including the fuel and steam costs related to economy energy sales and other energy sold on an economic dispatch basis,
- (m) Forecasted net revenues from the sale of environmental attributes from any Commission approved contract and

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RIDER FOR FUEL AND PURCHASED ENERGY CHARGE

- (n) Forecasted net revenues (margins) from asset-based wholesale energy and capacity sales.

The Forecasted Kilowatt-Hour Sales shall be Company's total forecasted kilowatt-hour Sales of Electricity, excluding inter-system sales referred to in (l) above and solar energy production and purchases referred to in (g) above.

CLASS COST FACTORS

A separate Class Cost Factor shall be applied to calculate the Forecasted FPE Charge for each Rate Class.

Rate Class	Class Cost Factor
Residential	1.01406
General Service	1.03518
Large Light & Power	1.00982
Large Power	0.99024
Municipal Pumping	1.01571
Lighting	0.82572

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Minnesota Power
Summary of Proposed Final/General Rates - Rate Design
Test Year 2020

MP Reply Comments - Attachment B
Rate Case Resolution - Docket E015/M-20-429

Rate	Description	Final/General Rates			Present (Pre-Rate Case) Rates		
		Monthly Customer Charge	Energy Charge/kWh	Demand Charge/kW	Monthly Customer Charge	Energy Charge/kWh	Demand Charge/kW
20	Residential Standard						
	Customer Charge	\$ 8.00			\$ 8.00		
	Block 1 Energy (0-400 kWh)		\$ 0.05911		\$ 0.07423		
	Block 2 Energy (401-800 kWh)		\$ 0.08255		\$ 0.09767		
	Block 3 Energy (801-1200 kWh)		\$ 0.10601		\$ 0.12113		
	Block 4 Energy (Over 12000 kWh)		\$ 0.13141		\$ 0.14653		
21	Dual Fuel - Residential						
	Customer Charge	\$ 8.00			\$ 8.00		
	Energy Charge		\$ 0.05888		\$ 0.07563		
23	Seasonal Residential						
	Customer Charge	\$ 10.00			\$ 10.00		
	Energy - All		\$ 0.09341		\$ 0.10853		
24	Controlled Access Residential						
	Customer Charge	\$ 8.00			\$ 8.00		
	Energy - All		\$ 0.05249		\$ 0.06769		
25	General Service						
	Customer Chg	\$ 12.00			\$ 12.00		
	Demand Meter - Energy		\$ 0.06054		\$ 0.07619		
	No Demand Meter -Energy		\$ 0.08639		\$ 0.10204		
	Demand Meter - Demand			\$ 6.50		\$ 6.50	
	High Voltage Discount			\$ (2.00)		\$ (2.00)	
	Transmission Service Discount		\$ (0.00350)		\$ (0.00350)		
26	Dual Fuel - Commercial/Industrial						
	Customer Charge	\$ 12.00			\$ 12.00		
	High Voltage Energy		\$ 0.05256		\$ 0.06982		
	Low Voltage Energy		\$ 0.05888		\$ 0.07563		
27	Controlled Access Commercial						
	Customer Charge	\$ 12.00			\$ 12.00		
	Energy - High Voltage		\$ 0.04623		\$ 0.06188		
	Energy - Low Voltage		\$ 0.05249		\$ 0.06769		
28	Residential Electric Vehicle						
	Customer Charge	\$ 4.25			\$ 4.25		
	Energy - On-Peak		\$ 0.10251		\$ 0.11763		
	Energy - Off-Peak		\$ 0.02391		\$ 0.03903		
75	Large Light & Power						
	Customer Charge	\$ 1,200.00			\$ 1,200.00		
	Energy - All		\$ 0.04148		\$ 0.05811		
	Demand - 1st 100kW			\$ -		\$ -	
	Demand - All Additional			\$ 10.50		\$ 10.50	
	High Voltage Discount			\$ (2.00)		\$ (2.00)	
	Foundry Discount			\$ (2.50)		\$ (2.50)	
	Transmission Service Discount		\$ (0.00350)		\$ (0.00350)		
75S	Large Light & Power - Schools						
	Customer Charge	\$ 600.00			\$ 600.00		
	Energy - All		\$ 0.04148		\$ 0.05811		
	Demand - 1st 50 kW			\$ -		\$ -	
	Demand - 2nd 50 kW			\$ 12.00		\$ 12.00	
	Demand - All Additional			\$ 10.50		\$ 10.50	
	High Voltage Discount			\$ (2.00)		\$ (2.00)	
	Transmission Service Discount						
75TOU	LLP Time of Use						
	Customer Charge	\$ 1,200.00			\$ 1,200.00		
	On-Peak Energy		\$ 0.04742		\$ 0.06337		
	Off-Peak Energy		\$ 0.03542		\$ 0.05275		
	On-Peak Demand			\$ 10.90		\$ 10.90	
	Off-Peak Demand			\$ 4.25		\$ 4.25	
87	Municipal Pumping						
	Customer Charge	\$ -			\$ 12.00		
	Demand Meter - Energy		\$ -		\$ 0.07619		
	No Demand Meter -Energy		\$ -		\$ 0.10204		
	Demand Meter - Demand			\$ -		\$ 6.50	
	High Voltage Discount			\$ -		\$ (2.00)	
	Transmission Service Discount		\$ -		\$ (0.00350)		
74	Large Power						
	Minumum Billing Demand - 1st 10,000 kW	\$ 250,087.00			\$ 250,087.00		
	Demand - All Additional			\$ 24.96		\$ 24.96	
	Firm Energy		\$ 0.01041		\$ 0.02778		

NOTE: Lighting Rates are not included above but are shown on revised Schedule E.

Present Rate energy charges include Base Cost of Fuel and Purchased Energy of \$0.02121/kWh (average retail), adjusted for Class Cost Factors. Final/General Rate energy charges include zero (\$0.00000) Base Cost of Fuel and Purchased Energy because all such costs are instead included in the separate Fuel and Purchased Energy Charge.

MINNESOTA POWER
COMPARISON OF OPERATING REVENUES
PRESENT VS. GENERAL RATES
TEST YEAR 2020
RATE CASE RESOLUTION PROPOSAL

Rate Classes	Customers	MWh	Operating Revenues		Increase	
			Present	General	(\$)	(%)
1 Residential	112,654	948,850	\$103,155,762	\$107,935,225	\$4,779,463	4.63%
2 General Service	20,894	678,755	\$72,603,025	\$75,936,603	\$3,333,578	4.59%
3 Large Light & Power	446	1,324,161	\$107,257,130	\$111,820,178	\$4,563,049	4.25%
4 Large Power	9	5,288,437	\$326,147,596	\$338,599,437	\$12,451,841	3.82%
5 Municipal Pumping	-	-	-	-	\$0	0.00%
6 Lighting	5,045	20,418	\$3,511,645	\$3,693,860	\$182,215	5.19%
7 Subtotal (By Rate Class)	139,048	8,260,621	\$612,675,158	\$637,985,304	\$25,310,146	4.13%
<u>Dual Fuel (Interruptible)</u>						
8 Residential	7,676	97,889	\$8,225,331	\$8,573,706	\$348,375	4.24%
9 Commercial/Industrial	543	27,733	\$2,218,987	\$2,326,293	\$107,306	4.84%
10 Subtotal Dual Fuel	8,219	125,622	\$10,444,318	\$10,899,999	\$455,681	4.36%
11 TOTAL (Sales of Electricity Including Dual Fuel)		8,386,243	\$623,119,476	\$648,885,303	\$25,765,827	4.13%
12 Large Power (Other) 1/		848,471	\$35,603,835	\$35,603,835	\$0	0.00%
13 TOTAL	147,267	9,234,714	\$658,723,311	\$684,489,139	\$25,765,827	3.91%
<u>Adjustments to Revenue</u>						
14 Boswell 4 Environmental Adjustment			\$0	\$0	\$0	0.00%
15 Renewable Resource Adjustment			\$0	\$0	\$0	0.00%
16 Transmission Adjustment			\$0	\$0	\$0	0.00%
18 Solar Energy Adjustment			-\$463,731	-\$463,731	\$0	0.00%
19 Community Solar Garden		1,553	\$132,583	\$132,583	\$0	0.00%
20 Conservation Program Adjustment			\$86,687	\$86,687	\$0	0.00%
21 CCRC Credit for CIP-exempt			-\$1,262,387	-\$1,262,387	\$0	0.00%
23 CARE Surcharge			\$1,885,875	\$1,885,875	\$0	0.00%
24 Subtotal Revenue Adjustments		1,553	\$379,027	\$379,027	\$0	0.00%
25 Total E Schedule Revenue		9,236,266	\$659,102,339	\$684,868,166	\$25,765,827	3.91%

Notes:

1/ Large Power (Other) includes IPS for Present and General Rates.

IN THE MATTER OF THE EMERGENCY PETITION
OF MINNESOTA POWER FOR APPROVAL TO
MOVE ASSET-BASED WHOLESALE SALES
CREDITS TO THE FUEL ADJUSTMENT CLAUSE
AND RESOLVE RATE CASE

MPUC DOCKET NO. E015/M-20-429

IN THE MATTER OF THE APPLICATION OF
MINNESOTA POWER FOR AUTHORITY TO
INCREASE RATES FOR ELECTRIC UTILITY
SERVICE IN MINNESOTA

MPUC DOCKET No. E015/GR-19-442

CERTIFICATE OF SERVICE

Theresa Senart certifies that on the 18th day of May 2020, on behalf of Minnesota Power, she efiled a true and correct copy of **Minnesota Power's Reply Comments** via eDockets (www.edockets.state.mn.us). Said document is also served via U.S. Mail or email as designated on the attached Service Lists on file with the Minnesota Public Utilities Commission in the above-referenced dockets.

/s/ Theresa Senart _____

Theresa Senart

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Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_20-429_M-20-429
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_20-429_M-20-429
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_20-429_M-20-429
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_20-429_M-20-429
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_20-429_M-20-429
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-429_M-20-429
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_20-429_M-20-429
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-429_M-20-429
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_20-429_M-20-429
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_20-429_M-20-429
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_20-429_M-20-429
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_20-429_M-20-429
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-429_M-20-429
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-429_M-20-429
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_20-429_M-20-429
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_20-429_M-20-429
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-429_M-20-429
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-429_M-20-429
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_20-429_M-20-429
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_20-429_M-20-429
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-429_M-20-429
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-429_M-20-429
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_20-429_M-20-429
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-429_M-20-429
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_20-429_M-20-429
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_20-429_M-20-429

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kristin	Berkland	kristin.berkland@ag.state.mn.us	Office of the Attorney General-RUD	445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mnsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_Official CC Service List
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Annete	Henkel	mui@mnuilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-442_Official CC Service List
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_Official CC Service List
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy	1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tony	Mancuso	mancusot@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daryl	Maxwell	dmaxwell@hydro.mb.ca	Manitoba Hydro	360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201 Saint Paul, MN 55104-1850	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Joseph	Meyer	joseph.meyer@ag.state.mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	No	OFF_SL_19-442_Official CC Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_Official CC Service List
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_Official CC Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official CC Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert H.	Schulte	rhs@schultheassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official CC Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_19-442_Official CC Service List
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_Official CC Service List

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 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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