



May 19, 2026

Andrew P. Moratzka
33 South Sixth Street, Suite 4200
Minneapolis, MN 55402
D. 612.373.8822
andrew.moratzka@stoel.com

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of the Petition for Approval of Modifications to Large Power Tariff
Docket No. E-015/M-26-126**

Dear Ms. Bergman:

Pursuant to the most recent Notice of Extended Comment Period in the above-captioned docket, the Large Power Intervenors¹ (“LPI”) submit this reply letter. LPI appreciates all of the thoughtful and well-reasoned comments submitted in this docket, which raise important concerns about Minnesota Power’s (“Minnesota Power” or “the Company”) petition to utilize its existing Large Power Tariff to serve new very large customers (the “Petition”). LPI submits this brief reply on three issues.

First, consistent with many of these comments, as well as the Minnesota Public Utilities Commission’s (“Commission”) recent decision in a related very large customer docket,² LPI continues to request that the Commission reject the Petition and require the Company to establish a separate rate class for new very large customers.

Second, LPI continues to recommend that the Commission define “very large customer” for purposes of this new rate class for new customers. But LPI will defer to the Commission as to whether that definition is consistent with, or deviates from, the Commission’s decision in the Xcel Very Large Customer Docket.

¹ LPI is an ad hoc consortium of Large Power and Large Light and Power customers of Minnesota Power consisting for purposes of this filing of Blandin Paper Company; Boise Paper, a Packaging Corporation of America company, formerly known as Boise, Inc.; Cleveland-Cliffs Minorca Mine Inc.; Enbridge Energy, Limited Partnership; Gerdau Ameristeel US Inc.; Hibbing Taconite Company; Sappi Cloquet, LLC; USG Interiors, Inc.; United States Steel Corporation (Keetac and Minntac Mines); and United Taconite, LLC.

² *In the Matter of Xcel Energy’s Petition for Approval of Large General Time of Day Service Customer and Large Peak Controlled Time of Day Service Tariffs*, Docket No. E002/M-25-289 (“Xcel Very Large Customer Docket”).

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Finally, it is imperative that the Company be directed to track, in between general rate cases, both incremental costs and incremental revenues associated with serving the new very large customer class. While ratepayers undoubtedly need protection from paying the Company's incurred cost of service for new very large customer classes, there is also significant risk that the Company's revenue requirement will be significantly different if a new very large customer begins taking service after the conclusion of a rate case. Therefore, LPI respectfully requests the Commission direct Minnesota Power to (i) track any new revenues associated with service to the new very large customer class for possible refund to ratepayers, and (ii) require the Company to file a new rate case after one year of service to any customer in the new class or demonstrate why such rate case filing is unnecessary.

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM/cal
Enclosures

cc: Service List

153012047.4 0064591-00034

CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day, served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

REPLY COMMENT LETTER

SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS

In the Matter of the Petition for Approval of
Modifications to Large Power Tariff
Docket No. E-015/M-26-126

Dated this 19th day of May, 2026.

Carmel Laney
Carmel Laney

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 26-126
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	Official 26-126
6	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	Official 26-126
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 26-126
8	Hudson	Kingston	hudson@curemn.org			PO Box 712 Ely MN, 55731 United States	Electronic Service		No	Official 26-126
9	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 W Superior St, Duluth, MN, 55802 Duluth MN, 54534 United States	Electronic Service		No	Official 26-126
10	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 26-126
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 26-126
12	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	Official 26-126
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 26-126
14	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN,	Electronic Service		No	Official 26-126

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55104 United States				