

**STATE OF MINNESOTA  
BEFORE THE PUBLIC UTILITIES COMMISSION**

Katie Sieben	Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

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

**DOCKET NO. E-015/GR-19-442**

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. E-015/M-20-429**

**COMMENTS OF THE OFFICE OF  
THE ATTORNEY GENERAL**

**INTRODUCTION**

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Comments in response to the Commission’s April 28, 2020 Notice of Shortened Comment Period on Minnesota Power’s April 23, 2020 petition to resolve its rate case. These Comments focus on certain key proposals in the petition. Namely, these Comments explore Minnesota Power’s proposal to reduce a base-rate credit for asset-based wholesale margins and to move the credit to its Fuel Adjustment Clause rider; its proposal to withdraw the current rate case and not file a new rate case before November 2021, except in certain limited circumstances; its deferral of residential rate-design issues to a time-of-use docket; its treatment of an existing discount for certain Large Power customers; and certain other issues that are vital to an equitable analysis of the petition. Because the petition would permanently enshrine the Energy-Intensive Trade-Exposed (“EITE”) discount in base rates, the Commission should not grant the petition without first requiring the Company to equitably apportion the discount’s cost.

## BACKGROUND

### I. PROCEDURAL HISTORY

On November 1, 2019, Minnesota Power (or “Company”) filed an application to increase rates by \$65.9 million, or 10.59 percent.<sup>1</sup> The Company’s requested increase for residential customers is 15 percent which, if approved, would amount to \$11.66 per month, or \$139.92 per year, for a residential customer with average electric usage.

On December 23, 2019, the Commission granted Minnesota Power’s request to increase rates by 5.8 percent on an interim basis while the parties litigated the merits of the proposed general rate increase.

On March 17, 2020, Minnesota Power filed a letter noting the statewide impacts of the COVID-19 pandemic and committing to work with the parties to determine how best to move forward with the rate case under the circumstances.

On April 2, 2020, Administrative Law Judge (“ALJ”) Eric Lipman extended all deadlines in the rate case by 30 days.

On April 23, 2020, Minnesota Power moved to suspend the rate-case schedule and filed a petition to resolve the case by removing asset-based wholesale margin credits from base rates and adding them to the Company’s Fuel Adjustment Clause rider.<sup>2</sup>

On April 24, 2020, ALJ Lipman granted the Company’s motion to suspend the procedural schedule, canceled the remaining rate-case deadlines, and ordered the Company file periodic status reports.

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<sup>1</sup> See Docket No. E-015/GR-19-442, Notice of Change in Rates (Nov. 1, 2019).

<sup>2</sup> See Docket No. E-015/M-20-429, Petition for Approval to Move Asset Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case (Apr. 23, 2020) (hereinafter “Petition”).

On April 28, 2020, the Commission issued a Notice of Shortened Comment Period for Minnesota Power’s petition to resolve the rate case, requesting that parties file initial comments by May 11, 2020 and reply comments by May 18, 2020.

At an April 30, 2020 hearing, the Commissioners voted to reduce Minnesota Power’s interim rates to 4.1 percent to match the final increase contemplated by the petition.

## **II. THE COMPANY’S PETITION**

Minnesota Power’s petition contains a number of complex and interconnected provisions. The OAG summarizes here those positions that it perceives to be key to making a holistic determination about the reasonableness of the Company’s requests.

### **A. Moving Margin Credits from Base Rates to the Fuel Adjustment Clause**

The centerpiece of Minnesota Power’s petition is a proposal to remove asset-based wholesale sales margins (“margin credits”) from base rates and add them to the rider that the Company uses to recover fuel and purchased energy costs.<sup>3</sup> In its petition, the Company refers to this rider as the Fuel Adjustment Clause (“FAC”).

Margin credits represent the net revenue that Minnesota Power earns from selling the output of rate-base generation assets that are not needed to serve customer load at a particular point in time.<sup>4</sup> These sales can be for energy, capacity, or both, and can take the form of short-term sales on the MISO market or longer-term bilateral contracts with a specific counterparty.

Historically, Minnesota Power has returned the benefit of these asset-based sales to ratepayers through a credit to their base rates. In each rate case, the Company forecasts its asset-based sales margins to establish the test-year amount of the margin credit. In Minnesota Power’s

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<sup>3</sup> See Minnesota Power Electric Rate Book, Section V, pages 50.0–50.2 (“Rider for Fuel and Purchased Energy Charge”).

<sup>4</sup> See Docket No. E-015/GR-19-442, Direct Testimony of Julie Pierce at 9 (Nov. 1, 2019) (hereinafter “Pierce Direct”).

last rate case, the annual value of the margin credit was \$35.8 million on a Minnesota-jurisdictional basis. However, in the current case, the Company calculated a margin credit of only \$10 million for the 2020 test year.<sup>5</sup> The \$25.8 million reduction is due primarily to the April 30, 2020 expiration of a ten-year, 100 megawatt (“MW”) bilateral contract (“Large Market Contract,” or “LMC”). According to Minnesota Power, this type of large, long-term sale cannot be replicated on today’s energy markets.<sup>6</sup>

Instead of reducing the rate-base margin credit to \$10 million as it originally proposed in the rate case, Minnesota Power’s petition proposes to reduce the base-rate credit to zero, resulting in a 5.75 percent base-rate increase,<sup>7</sup> and to return the \$10 million to ratepayers through a credit to the FAC. In the near term, the net impact is a \$25.8 million, or 4.1 percent, overall rate increase between base rates and the FAC.<sup>8</sup>

Beyond the amount of the overall increase, Minnesota Power’s proposal changes the application of margin credits in two ways that may affect the reasonableness of the Company’s proposal. First, unlike base rates, FAC recovery is “trued up” annually based on actual fuel and purchased energy costs and revenues.<sup>9</sup> This means that, depending on whether the wholesale margins Minnesota Power earns in 2020 are larger or smaller than its \$10 million estimate, the FAC would be adjusted in 2021 to return this difference to, or recover it from, ratepayers. In other words, the FAC’s annual true-up process would allow for changes in the margin credit—whether increases or decreases—to be reflected in rates more quickly than would typically occur

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<sup>5</sup> Pierce Direct at 11.

<sup>6</sup> *See id.* at 22.

<sup>7</sup> *See* Docket No. E-015/M-20-429, Minnesota Power Letter, attach. E (Apr. 30, 2020) (hereinafter “MP April 30 Letter”).

<sup>8</sup> *See* Petition, attach A.

<sup>9</sup> *See generally 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 Additional Details of New Fuel Clause Adjustment Process (June 12, 2019). Moreover, adjustments can be made more frequently due to significant unforeseen changes to fuel costs. *See id.* at 4–5.

through general rate cases filed at less frequent intervals, and would result in ratepayers receiving the actual value of asset-based margins.

Second, Minnesota Power’s proposal changes how margin credits are allocated among its customer classes. Margin credits can have both an energy and a capacity component. In base rates, energy-related costs are generally allocated based on each class’s share of the total system energy consumption, and capacity-related costs are separately allocated according to the demand imposed on the system by each class during specific peak hours.<sup>10</sup> Minnesota Power’s proposal, however, relies solely on class energy usage as the basis for both removing the margin credit from base rates and adding it to the FAC. As a result, the individual classes’ rate increases differ from the overall 4.1 percent increase.<sup>11</sup>

**Figure 1:  
Proposed Rate Increases for Selected Classes<sup>12</sup>**

Class	Increase
Residential	4.63%
General Service	4.59%
Large Power	3.82%

**B. Interim-Rate Reduction and Partial Refund**

A second key feature of Minnesota Power’s petition is its proposal to reduce interim rates from 5.8 percent to 4.1 percent effective May 1, 2020, and to refund all interim rates collected prior to that date.<sup>13</sup> Together, these two adjustments would approximate the financial impact of the Large Market Contract’s expiration on April 30, 2020. Refunding interim rates collected

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<sup>10</sup> See MP April 30 Letter, attach. C model, sheet 2, rows 14–26 (showing 2017 CCOSS allocation between energy and capacity).

<sup>11</sup> See *id.*, attach. C (stating that most of the difference between the current base-rate allocation of margin credits and the proposed allocation “is due to the proposal including a levelized 5.75% average rate increase for each class to add the margin credits back to base rates” and that “[u]sing a levelized 5.75% rate increases the average \$/kWh rates more for customer classes that have higher existing average rates”).

<sup>12</sup> Petition, attach. B at 1.

<sup>13</sup> Petition at 16–17.

between January 1 and April 30, 2020 would reflect that the LMC was still yielding wholesale margins during those months. After April 30, 2020, the LMC margins cease, resulting in the proposed 4.1 percent rate increase between base rates and the FAC.

At the Commission’s April 30, 2020 meeting, the Commissioners voted to require Minnesota Power to reduce interim rates from 5.8 percent to 4.1 percent as soon as reasonably practicable. The Company represented that it would make the reduction on May 1. Minnesota Power will refund interim rates collected between January 1 and April 30, 2020, however, only if its petition is granted. The Company estimates that this refund would total approximately \$12 million.<sup>14</sup> For the average residential customer, this would mean a one-time bill credit of approximately \$18.<sup>15</sup>

### **C. Withdrawal of Rate Case and “Stay Out” Commitment**

If the Commission grants Minnesota Power’s petition, the Company would withdraw its rate case<sup>16</sup> and would not file another general rate case before March 1, 2021, under any circumstances.<sup>17</sup> The Company would further commit not to file a new rate case before November 1, 2021, unless an energy-intensive trade-exposed (“EITE”) customer shuts down or idles at least 50 MW of load below the customer’s actual load on April 20, 2020, and this load remains shut down or idled for at least three months.<sup>18</sup> If the load reduction occurs before

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<sup>14</sup> Petition at 17.

<sup>15</sup> *See id.* at attach. A (showing residential interim-rate bill impact of \$4.48/month). The actual residential refund is likely to be lower because Minnesota Power is proposing to adjust the refunds to reflect the difference between the overall 4.1 percent interim-rate increase and the actual impact on each customer class of its proposed method of moving margins credits to the FAC.

<sup>16</sup> *Id.* at 16.

<sup>17</sup> *Id.* at 17.

<sup>18</sup> *Id.* Energy-intensive trade-exposed, or “EITE,” refers to certain very large customers of Minnesota Power who receive a rate discount under a tariff authorized by Minn. Stat. § 216B.1696. *See also* Minnesota Power Electric Rate Book, Section V, pages 98.0–98.2 (“Rider for Energy-Intensive Trade-Exposed (EITE) Customers”) (hereinafter “EITE rider”).

November 1, 2021, Minnesota Power would provide the Commission 90 days' written notice before filing a rate case.<sup>19</sup>

If the Commission rejects Minnesota Power's petition, the Company intends to continue litigating the rate case. The Company acknowledges that further adjustment of the rate-case schedule will be necessary due to the delay caused by the current petition, and agrees to waive the statutory deadline for the Commission's final decision so that the schedule may be extended by 60 days. Combined with the previous 30-day extension agreed to by the parties and granted by the ALJ, an additional 60-day extension would require a final Commission order by approximately March 1, 2021.<sup>20</sup>

#### **D. Transferring Certain Rate-Design Decisions to Other Dockets**

Finally, Minnesota Power's petition would defer to other dockets (1) a decision on intraclass residential rate design and (2) a decision on extending the EITE rider beyond its original term. First, in the rate case, the Company had proposed to transition the existing residential inclining-block rate structure to a flat rate in preparation for an eventual move to a time-varying rate. In its current petition, the Company instead proposes to address residential rate-design issues in a residential time-of-day rate proceeding, Docket No. E-015/M-12-233.

Second, the EITE rider was originally scheduled to expire on February 1, 2021. At Minnesota Power's request, and over the OAG's objection, the Commission extended the rider until final rates take effect in the rate case.<sup>21</sup> When the Commission extended the rider, final rates were not expected to take effect until at least mid-2021. As part of its proposed resolution

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<sup>19</sup> Petition at 4.

<sup>20</sup> See Docket No. E-015/GR-19-442, Order Accepting Filing and Suspending Rates at 2–3 (Dec. 23, 2019) (setting date for final order at November 30, 2020, under Minn. Stat. § 216B.16, subd. 2(f)); ALJ's Fifth Prehearing Order at 3–5 (Apr. 2, 2020) (extending rate-case deadlines by 30 days).

<sup>21</sup> See *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. E-015/M-16-564, Order Approving Rider Extension with Conditions at 4 (Mar. 17, 2020).

of the rate case, the Company now asks the Commission to allow the EITE rider to expire in February 2021 as originally scheduled.<sup>22</sup> Although the petition would maintain the EITE rider's original expiration date, it would also permanently incorporate the discount's revenue-apportionment impact into base rates, as discussed later in these Comments.

## ANALYSIS

### **I. MINNESOTA POWER'S PROPOSED RESOLUTION HOLDS SOME POTENTIAL BENEFITS FOR RATEPAYERS.**

If the Commission grants Minnesota Power's petition, there would be some tangible near-term rate-stability and administrative benefits for ratepayers and the parties. The petition contemplates near-term rate relief for residential ratepayers that, combined with other non-rate relief they may be receiving, could mean the difference between their short-term financial stability or instability. The petition would also allow some of the parties to preserve or redirect their limited financial resources to ensure their ability to advocate for residential ratepayers in other COVID-19-related matters. Finally, ending the rate-case proceedings would avoid the administrative burden of complying with important state-mandated social-distancing requirements and could reduce potential added costs to residential ratepayers from a web-conferenced evidentiary hearing.

#### **A. Granting the Petition Would Provide Ratepayers Some Rate Relief and Near-Term Rate Stability.**

If the petition is granted, Minnesota Power would return the interim rates collected from customers between January 1 and April 30, 2020, to recognize the fact that the LMC was still providing margins during that timeframe. This refund would result in a one-time bill credit of approximately \$18 to an average residential ratepayer. While the amount is fairly modest, it

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<sup>22</sup> Petition at 18.



would provide rate relief at a time of social and economic disruption when even modest bill savings could make a difference for consumers trying to afford their lives.

Furthermore, if the petition is granted, Minnesota Power would commit not to file a new rate case under any circumstances before March 1, 2021. The Company’s stated goal is to avoid filing before November 2021, but the petition leaves open the possibility that the Company could do so in the event of a substantial and prolonged loss of large-customer load. The petition’s “stay out” provisions provide ratepayers with at least some assurance that another rate increase will not come on the heels of the current one.

The following chart compares the residential rate increase resulting from the Company’s current petition to two potential outcomes of continuing with the rate case:

**Figure 2:  
Comparison of Possible Residential Rate Increases  
Through Base Rates and the FAC**

	Jan.–Apr. 2020	May–Dec. 2020	Jan.–Apr. 2021	Average Jan. 2020– Apr. 2021
Proposed Resolution: Same Margin Credit in 2021	0.00%	4.63%	4.63%	3.47%
Case Continues: MP Receives 22% of Request <sup>23</sup>	3.30%	3.30%	3.30%	3.30%
Case Continues: MP Receives 66% of Request <sup>24</sup>	5.80%	4.10%	4.10%	4.53%

<sup>23</sup> Minnesota Power received approximately 22 percent of the requested increase in its 2016 rate case. Multiplying the proposed 15 percent residential increase in this case by 22 percent yields a 3.3 percent final increase. This row lists the 3.3 percent final increase for the entire period, although it would not take effect until the conclusion of the case, with the interim-rate refund.

<sup>24</sup> Minnesota Power received approximately 66 percent of the requested increase in its 2009 rate case. Multiplying the proposed 15 percent residential increase in this case by 66 percent yields a 9.9 percent final increase. This is higher than the interim-rate increase, but the Company would not be allowed to charge ratepayers for the shortfall after the fact, so this row lists interim rates.

Figure 2 is intended as a rough guide and has several limitations. First, the figure uses a January 1, 2020–April 30, 2021 time horizon because of uncertainty around the timing and magnitude of future rate increases beyond April of next year. If the Commission accepts Minnesota Power’s proposal, the Company would not file a new rate case before March 1, 2021, and any interim rate increase would not take effect until at least May 1, 2021. If the case continues, a final decision by the Commission would be due on or about March 1, 2021, making it unlikely that a final increase, or interim rates in a new rate case, would take effect before the end of April 2021.

Second, Figure 2 assumes that the margin credit will continue at the same level in 2021. The OAG served discovery on the Company to test the strength of this assumption. As discussed later in these Comments, current economic circumstances, including major near-term loss of large customer load, suggest that there could be some decline in asset-based wholesale margins in 2021. A complete loss of the wholesale margin credit in 2021, although unlikely, would mean a 5.75 percent rate increase effective January 1, 2021.<sup>25</sup>

Finally, the OAG has not attempted to account for the time value of money. Accounting for the time value of money would make the Company’s proposal look slightly more favorable because it would return January–April 2020 interim rates immediately. On the other hand, the scenario in which Minnesota Power receives 22 percent of its request after fully litigating the rate case would look less favorable if the time value of money were included, because ratepayers likely would not see interim-rate refunds until sometime in 2021.

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<sup>25</sup> See MP April 30 Letter, attach. E (noting that base-rate increase from loss of all margin credits is 5.75 percent).

**B. Granting the Petition Would Mitigate Administrative Challenges Unique to the COVID-19 Pandemic.**

If the Commission grants the petition and resolves the rate case, parties could redirect resources to respond to more pressing needs during the COVID-19 pandemic. For example, in its petition Minnesota Power expresses an interest in prioritizing its core function of providing safe and reliable electric service to its customers.<sup>26</sup> The parties' informal discussions have also explored whether it would be sensible for consumer advocates to preserve their limited resources to support ratepayers whose ability to advocate for themselves has been further diminished by the pandemic.

In addition, while some rate case tasks can be completed electronically (e.g., briefing), some rate-case tasks may require access to paper files or other documents for which remote access is not an option (e.g., testimony development and/or evidentiary hearing preparation). Resolving the case would remove any need to put people in close proximity to complete rate-case tasks that cannot be done remotely.

Finally, assuming that social-distancing requirements will remain in place for the near future, it may prove impracticable to conduct a safe, effective, and efficient evidentiary hearing. For example, it would be challenging to safely gather party representatives and witnesses in the Large Hearing Room for a traditional evidentiary hearing. Although the hearing could be conducted via WebEx or another web-conferencing platform, this would make even the most basic actions, like cross-examining a witness or raising a prompt objection, more difficult and could impair parties' ability to advocate effectively. Moreover, the video/voice lag, muting/unmuting, video, recording, and bandwidth challenges of a web conference could extend

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<sup>26</sup> Petition at 16.

what would otherwise be a four-day evidentiary hearing into a six-day (or more) evidentiary hearing, with ratepayers ultimately paying for the costs associated with the extra time.

**C. Granting the Petition Would Reasonably Defer Certain Information- and Resource-Intensive Decision Items.**

At a time when the United States economy is in flux<sup>27</sup> and Minnesota Power has already seen a credit downgrade,<sup>28</sup> the petition reasonably defers decisions on the Company's return on equity ("ROE") and sales forecast until the power market has had a chance to stabilize. Litigating these issues now would likely require multiple adjustments throughout the contested-case proceeding if the market continues to change in unanticipated ways. Postponing the ROE and sales-forecast decisions until Minnesota Power's next rate case would bring the added benefit of additional months of market information for the parties to use to average and/or smooth out COVID-19-related financial anomalies.<sup>29</sup>

Similarly, Minnesota Power's residential-rate-design request to move from an inclining-block rate to a flat rate before transitioning to a time-varying rate is more appropriately examined in its own docket. The OAG questions the suitability of an interim move to a flat rate, particularly in light of the potential impact of such a change on the Company's low-income customers and the fact that Minnesota Power just kicked off a second time-of-use ("TOU") stakeholder process in March 2020. Information requests and informal communications from

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<sup>27</sup> See, e.g., S&P Global Market Intelligence, *Full Impacts of COVID-19 Shutdown on Utilities, Power Markets Still to Come*, <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/full-impacts-of-covid-19-shutdown-on-utilities-power-markets-still-to-come-58069493> (Apr. 17, 2020) ("The [COVID-19-related] economic downturn more broadly will impact utilities' cost of capital, liquidity, hedging and possibly capital expenditure programs, as well as the timing and choices in integrated resource plans.").

<sup>28</sup> See generally Docket No. E-015/GR-19-442, S&P Global Credit Rating Downgrade (Apr. 22, 2020).

<sup>29</sup> See *In the Matter of the Petition by Great Plains Natural Gas Company for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-004/GR-19-511, Craig M. Addonizio's Response to Ann E. Buckley's Summary of Testimony at 1 (Mar. 12, 2020) ("While I maintain [a] strong preference for 30-day averaging periods, I acknowledge that on rare occasions, during periods of extreme market volatility, it may be appropriate to use longer averaging periods or make other changes to ROE analyses to account for the distortion in the price signals from the stock market. . . . ROEs set in rate cases should not be unduly influenced by such historic, anomalous, short-term volatility.").

other parties, and Minnesota Power's responses, also support exploring time-varying and TOU rate issues, and the interplay between them, in a dedicated docket.

**II. THE COMPANY'S PROPOSAL HAS SOME MAJOR DISADVANTAGES, INCLUDING HARMS TO RESIDENTIAL AND SMALL-BUSINESS RATEPAYERS THAT SHOULD BE MITIGATED IF THE PETITION IS GRANTED.**

Although Minnesota Power's petition would provide ratepayers with some short-term financial benefits, these benefits must be weighed against any corresponding long-term detriments. First, the petition narrows the scope of the rate case to a handful of issues, but it does so in a way that increases costs to ratepayers. Second, the petition's stay-out provision is nearly swallowed up by its exception related to lost EITE-customer load. Third, if margin credits are moved to the FAC, the FAC's annual true-up process could result in yet another incremental rate increase in 2021. Finally, and most concerning, Minnesota Power's proposed method of removing margin credits from base rates harms residential and small-business ratepayers by permanently extending the EITE discount's interclass revenue-apportionment impact. The OAG addresses each of these issues below.<sup>30</sup>

**A. Granting the Petition Would Substantially Increase Rates Based on a Single Issue.**

While the petition is more or less limited to a single issue, it is an issue that solely benefits Minnesota Power. The loss of the LMC's wholesale margins is perhaps the largest driver of the Company's rate case. If the current petition is granted, many other areas of Minnesota Power's operations will not be scrutinized for potential cost decreases or savings until the Company's next general rate case. Minnesota Power characterizes its proposal as simply

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<sup>30</sup> The OAG also recommends that any interim-rate refund in this case include interest calculated at Minnesota Power's cost of capital. While the Company's proposal to refund interim rates at the prime rate is consistent with Commission rule, it fails to address equity concerns previously identified by the OAG. Given the unusual circumstances of this case and in the interest of a quick resolution of the current petition, however, the OAG would not oppose a temporary deferral of this issue.

“transitioning” recovery of margin credits to the FAC, but the proposal entails a nearly \$36 million, or 5.75 percent, increase to base rates. While this increase is partially offset by a projected \$10 million margin credit delivered through the FAC, that credit is not guaranteed to last beyond 2020 at the same level, as discussed below.

**B. The Benefit of the Petition’s “Stay-Out” Provision is Limited by Its Exception for Lost EITE-Customer Load.**

The petition’s stay-out provision provides that Minnesota Power will not file a new rate case before November 1, 2021, with one major exception: If an EITE customer shuts down or idles at least 50 MW of load below the customer’s actual load as of April 20, 2020, and this load loss continues for at least three months, the Company could file a rate case upon 90 days’ notice. In no event would the Company file a new case before March 1, 2021.

Currently, no fewer than five EITE customers are expected to be offline as of June 1, 2020, for a total lost load of nearly 300 MW.<sup>31</sup> At least one of these customers, Hibbing Taconite, has announced plans to come back online later in the summer. However, more than 80 percent of the currently lost EITE load would have to return in a timely manner to avoid triggering the 50 MW stay-out exception. Thus, it is likely most realistic for the Commission to assume that, if it grants Minnesota Power’s petition, it will see the Company again for a rate case on March 1, 2020.

**C. The Margin Credit Could Decrease Again in 2021, Leading to a Rate Increase Through the FAC True-up.**

Actual asset-based wholesale margins change from year to year. With the margin credit in base rates, Minnesota Power has benefitted when actual margins are higher than the base-rate

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<sup>31</sup> See Minnesota Power Public Response to OAG IR No. 6010 (OAG Attach. A).

credit, and ratepayers have benefitted when actual margins are lower than the credit.<sup>32</sup> Moving margin credits to the FAC would mean that any year-to-year changes to the asset-based margin levels would be captured by the FAC's annual true-up, rather than the credit staying the same until the next rate case. While this would theoretically prevent either the Company or ratepayers from receiving a windfall, there are disadvantages to using the FAC. First, if margin credits are moved into the FAC, they can be reduced (and rates increased) without the rigorous scrutiny of a rate case. Second, Minnesota Power is proposing to change the treatment of margin credits at a time when actual margins are trending down.

On this second point, on top of the major reduction in margins due to the loss of the LMC, economic indicators seem to suggest that asset-based margins could be even less than \$10 million in 2021. Minnesota Power asserts that "the Margin Credits are expected to continue throughout the remainder of 2020 and into the future."<sup>33</sup> However, the Company has so far declined to provide the Commission or the OAG with a margin-credit forecast for 2021.<sup>34</sup> Minnesota Power also made a point of stating in its petition that asset-based margins do not include margins from "wholesale sales that the Company makes when there is a loss of customer load."<sup>35</sup> Given the current and potential long-term loss of EITE load discussed earlier, the Company's statement puts into issue the distinction between these two margin categories: If the current loss of load continues to any degree, Minnesota Power will presumably make

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<sup>32</sup> See Pierce Direct at 31 fig.10 (comparing historical asset-based margins to margin credit).

<sup>33</sup> Petition at 12.

<sup>34</sup> See Minnesota Power Response to OAG IR No. 6009 at 3 (OAG Attach. B) ("At this time, Minnesota Power has not yet developed a forecast for margin credits for 2021 that could be applied to the 2021 FAC Forecast that was filed on May 1, 2020. If the Commission approves Minnesota Power's Emergency Petition . . . , Minnesota Power may file an updated 2021 FAC Forecast with an asset-based wholesale margin credit estimate for 2021.").

<sup>35</sup> Petition at 10.

replacement sales to recover lost revenue. This, in turn, could reduce the opportunity to make longer-term, asset-based sales that benefit ratepayers.<sup>36</sup>

**D. Minnesota Power’s Proposed Method of Removing Margin Credits from Base Rates Would Harm Residential and Small-Business Ratepayers.**

Minnesota Power proposes to transition margin credits from base rates to the fuel clause in two steps. First, to remove margin credits from base rates, the Company would increase each class’s average energy rate by 5.75 percent. This percentage represents the increase over current revenues that would be needed to collect an additional \$35.8 million, or the total value of the existing base-rate margin credit. Second, the Company would allocate the margin credit that remains after the LMC’s expiration—\$10 million—among the classes based on their energy usage and reduce their FAC rates accordingly.

In the first step, the Company makes problematic assumptions that favor the Large Power class at the expense of the other classes. At a high level, Minnesota Power attempts to preserve the EITE discount’s subsidy to Large Power customers through the base-rate increase, despite the fact that the EITE rider is set to expire at the conclusion of the rate case (or in February 2021 if the Commission restores the rider’s original expiration date). As a result, Large Power customers are given a benefit that is not reflected in the class rate increases that the Company presents in its petition, increases which are already skewed in favor of the Large Power class.<sup>37</sup>

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<sup>36</sup> Minnesota Power maintains that these two categories of margins are entirely separate, and that “loss of load sales do not affect the expectation for margin credit from asset-based sales.” Minnesota Power Response to OAG IR No. 6009 at 2–3 (OAG Attach. B). But even if this statement is accurate, the current and potential long-term economic impact of COVID-19 would suggest that wholesale margins are likely to be lower in the future.

<sup>37</sup> See Petition, attach. B (showing proposed class rate increases); MP April 30 Letter, attach. C (explaining that the main reason these increases favor the Large Power class is the proposed use of “a levelized 5.75% average rate increase for each class to add the margin credits back to base rates” and that “[u]sing a levelized 5.75% rate increases the average \$/kWh rates more for customer classes that have higher existing average rates”). The OAG continues to evaluate the propriety of these disparate class rate impacts, unrelated to the EITE discount, and reserves the right to provide its views in reply comments.



By way of background, the EITE rider provides certain Large Power customers with a discount, called an “energy charge credit,” of 1.15 cents for each kilowatt–hour they consume in excess of a monthly minimum.<sup>38</sup> The EITE rider is, by definition, not part of Large Power base rates. In the current rate case, Minnesota Power had initially proposed to make the revenue-apportionment impact of the EITE rider a permanent part of base rates.<sup>39</sup> However, any change to the interclass revenue apportionment would require full consideration of the Company’s and parties’ cost studies, as well as any relevant noncost factors bearing on rate design, through a contested-case process. And, although the Commission allowed the Company to use “present revenues,” including the EITE discount, as the basis for the interim increase,<sup>40</sup> the Commission has also emphasized that its interim-rate decisions do not prejudice the outcome of the rate case.<sup>41</sup>

Minnesota Power’s current petition would depart from the existing revenue apportionment, and the Company not been forthcoming about that fact. Despite claiming that the petition would maintain the status quo on EITE, Minnesota Power incorporates the EITE discount into base rates in two ways. First, it includes the EITE discount in the total present-retail-revenue amount that it uses to calculate the overall 5.75 percent rate increase.<sup>42</sup> The effect is a larger rate increase for all customers because the \$35.8 million revenue requirement is

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<sup>38</sup> See Minnesota Power Electric Rate Book, Section V, page 98.0 (EITE rider).

<sup>39</sup> See Direct Testimony of Marcia Podratz at 103 (Nov. 1, 2019) (stating that “[i]nstead of offering a separate discount, Minnesota Power aims to design its Large Power base rates to be reasonably close to the Large Power class cost of service”).

<sup>40</sup> See *id.* (stating that “the EITE rate discount currently in effect is included in present rate revenues for the Large Power class, as shown on Volume 3, Direct Schedule E-1”); compare Required Filing Schedules – Part 2, Direct Schedule E-1 at 2 (Nov. 1, 2019) (showing present Large Power revenue of \$325,538,419) with Interim Rates Petition, Direct Schedule C-8 (Nov. 1, 2019) (showing same, discounted Large Power revenue amount to be used as baseline for interim-rate increase).

<sup>41</sup> See Docket No. E-015/M-16-564, Order Approving Rider Extension with Conditions (Mar. 17, 2020) (extending the EITE rider through final rates while stating, “[T]he Commission’s decision in this order does not affect base rates or Minnesota Power’s 2020 rate case. The Commission does not intend to prejudice the rate case or make any indication of what it will decide in that matter.”).

<sup>42</sup> See Minnesota Power Response to OAG IR No. 6002 at 1–2 (OAG Attach. C) (showing that EITE discount was used to determine 5.75 percent overall increase).

divided by a smaller present-revenue number to calculate the overall increase.<sup>43</sup> Second, the Company multiplies discounted Large Power revenues by 5.75 percent to arrive at the Large Power class increase.<sup>44</sup> This means a smaller increase, in dollars, for the Large Power class than would result if the appropriate baseline of their *nondiscounted* revenues were used.

The petition's incorporation of the EITE discount is problematic because it *both* inflates the overall rate increase, *and* changes the base-rate revenue apportionment, based on a rider that, if the petition is approved, will expire early next year. If the Commission grants the petition without modification, the EITE rider's revenue-apportionment impact would be "baked into" base rates going forward and would persist for as long as the rates produced by the petition are in effect. Such a change in revenue apportionment should not be made without a careful analysis of class-cost-of-service data and other relevant factors, an analysis that has not yet been done, and will never be done if the Commission grants the petition.

In summary, Minnesota Power's petition does not maintain the rate-design status quo, but attempts to enshrine in base rates a discount that the Company has now twice asked be allowed to expire in February 2021. In the interest of maintaining the status quo and minimizing unnecessary interclass disputes, the OAG is willing to accept the EITE rider's original four-year term, provided that no surcharges are billed to non-EITE customers during the remaining term. But the Commission should not allow the Company to, additionally, build into base rates its EITE customers' preferred revenue apportionment. Accordingly, the OAG recommends that the Commission require the Company to recalculate the proposed base-rate increases by reallocating

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<sup>43</sup> See *id.* (stating that overall increase without discount would be 5.59 percent).

<sup>44</sup> See *id.*; see also MP April 30 Letter, attach. E (describing overall process to implement proposed resolution).

the impact of the EITE discount among all classes according to the existing base-rate revenue apportionment before applying the 5.75 percent increase to base rates.<sup>45</sup>

### **RECOMMENDATION**

The OAG provides the above discussion of the advantages and disadvantages of Minnesota Power's petition to assist the Commission in reaching a balanced resolution in this matter. Given the disadvantages outlined—in particular, rate-design changes that would harm residential and small-business ratepayers—the Commission should not grant the petition without first requiring Minnesota Power to reallocate the impact of the EITE discount among all classes according to the existing base-rate revenue apportionment before applying the 5.75 percent

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<sup>45</sup> If the Commission allows the EITE rider to expire with final rates in accordance with its most recent applicable order, the discount should not be used in determining the overall increase, meaning that the appropriate increase to base rates would be 5.59 percent. *See* Minnesota Power Response to OAG IR No. 6002 at 2 (OAG Attach. C).

increase to base rates. The OAG continues to investigate other aspects of the petition and may offer additional insights in reply comments.

Dated: May 11, 2020

Respectfully submitted,

KEITH ELLISON  
Attorney General  
State of Minnesota

/s/ **Peter G. Scholtz**

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Assistant Attorney General  
Atty. Reg. No. 0389936

/s/ **Kristin Berkland**

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ATTORNEYS FOR OFFICE OF  
THE ATTORNEY GENERAL—  
RESIDENTIAL UTILITIES DIVISION

**OAG No. 6010**

**State Of Minnesota  
Office of the Attorney General  
Utility Information Request**

*Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota* **MPUC Docket No.** E-015/GR-19-442

*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.** E-015/M-20-429

**Requested from:** Minnesota Power

**Requested By:** Peter Scholtz  
**Telephone:** (651) 757-1473

**Date of Request:** April 28, 2020  
**Due Date:** May 8, 2020

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Reference: Docket No. 20-429, MP Petition at 17.

MP's proposal provides that the Company would not file a new rate case before November 2021 unless an EITE customer shuts down or idles at least 50 MW of load relative to the customer's actual load on April 20, 2020, for at least three months.

- a. Identify all EITE customers that were not idled or shut down as of April 20, 2020, but are now idled or shut down or have announced plans to idle or shut down.
- b. For each customer, identify the date the idling or shutdown started or is expected to start, the announced duration if any, and the size of the lost load in MW.
- c. Provide the total lost EITE load in MW that is expected to be idled or shut down as of June 1, 2020.
- d. If two EITE customers with individual loads of less than 50 MW both idled, and their combined idled load was greater than 50 MW, would this idling trigger the stayout exception, assuming that it continued for at least three months and there was no other loss of EITE load?

Witness: Frank Frederickson  
Response by: Tim Beddow  
Title: Customer Business Analyst  
Department: Customer Experience  
Telephone: 218-355-3391

**RESPONSE:**

As of April 30, 2020:

- a. Hibbing Taconite<sup>1</sup>, Blandin<sup>2</sup> and Sappi were not idled or shutdown on April 20, 2020, but have announced plans to idle.
- b. Hibbing Taconite is expected to be idled May 3, 2020 through July 6, 2020. Hibbing Taconite has an EITE peak load of [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]. Blandin is expected to be idled [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]. Blandin has an EITE peak load of [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]. Sappi is expected to be idled [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]. Sappi has an EITE peak load of [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS].
- c. Please see Table 1 below outlining the total EITE load that is expected to be idled or shutdown as of June 1, 2020.

**TABLE 1**

<b>EITE Customers Expected to be Idle June 1, 2020</b>	
<b>Customer</b>	<b>EITE Peak (MW)<sup>1,2</sup></b>
-	[TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS]
US Steel - Keetac	[REDACTED]
Northshore Mining Company - Babbitt Mine (Jointly billed with United Taconite)	[REDACTED]
Hibbing Taconite Company	[REDACTED]
Mesabi Nugget	[REDACTED]
Mining Resources	[REDACTED]
	[TRADE SECRET DATA ENDS]
<b>Total</b>	<b>299.1</b>

<sup>1</sup> Northshore Mining Company - Babbitt Mine's EITE peak is the facility's estimated contribution to the joint EITE peak with United Taconite

<sup>2</sup> Source: EITE Letter agreements Docket No. E015/M-16-564

- d. If one or more EITE customers with individual loads of less than 50 MW idled and their combined idled load was greater than 50 MW more than their combined load on April 20, 2020, this would trigger the stayout exception.

<sup>1</sup> <https://www.duluthnewtribune.com/business/energy-and-mining/5420952-ArcelorMittal-will-idle-Hibbing-Taconite>

<sup>2</sup> [https://www.virginiamn.com/covid-19/upm-blandin-paper-mill-shuts-down-amid-virus/article\\_755aaef2-8414-11ea-80c3-4f8aff6e894.html](https://www.virginiamn.com/covid-19/upm-blandin-paper-mill-shuts-down-amid-virus/article_755aaef2-8414-11ea-80c3-4f8aff6e894.html)

Witness: Frank Frederickson  
Response by: Tim Beddow  
Title: Customer Business Analyst  
Department: Customer Experience  
Telephone: 218-355-3391

PUBLIC DOCUMENT  
TRADE SECRET DATA EXCISED

The information labeled as trade secret includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the related usage) consists of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer’s usage is maintained by the Company as not public data and protected from public disclosure.

Witness: Frank Frederickson  
Response by: Tim Beddow  
Title: Customer Business Analyst  
Department: Customer Experience  
Telephone: 218-355-3391

**OAG No. 6009**

**State Of Minnesota  
Office of the Attorney General  
Utility Information Request**

*Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota* **MPUC Docket No.** E-015/GR-19-442

*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.** E-015/M-20-429

**Requested from:** Minnesota Power

**Requested By:** Peter Scholtz  
**Telephone:** (651) 757-1473

**Date of Request:** April 28, 2020  
**Due Date:** May 8, 2020

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Topic: Relationship between sales due to loss of load and asset-based margin sales

In its 20-429 Petition at 10, MP states, “Sales due to customer loss of load will continue to be allocated in accordance with existing methodologies rather than through the FAC.”

In her 19-442 direct testimony at 35, Ms. Pierce states that sales due to loss of customer load do not impact asset-based wholesale margins. Yet she also states that sales due to loss of load are sourced from both market purchases and rate-base generating units (i.e., assets).

In an April 23 email responding OAG questions, MP stated that “There isn’t an overlap between sales due to loss of load and the asset-based sales. They are separately tracked in our OATI web TRadTMr software and the sales are made at different times.” MP further stated that, as large customers go idle, “we may make sales directly associated with the lost load from those customers and they would be new sales classified as sales due to loss of load. This would have no effect on the \$10M of asset-based sales expected for 2020. Most of those sales have already been made and would not be reclassified as sales due to loss of load.”

**2020 Margin Credit**

- a. Confirm that loss of customer load in 2020 will not impact the estimated \$10 million margin credit for 2020.
- b. Explain what other factors may affect the estimated \$10 million 2020 margin credit and identify whether these factors would tend to reduce or increase the credit.



## 2021 Margin Credit

- c. What is MP's current forecast of asset-based wholesale margins for 2021?
- d. Could loss of customer load affect the 2021 margin credit? How?
- e. Explain what factors other than lost load may affect the 2021 margin credit and identify whether these factors would tend to reduce or increase the credit.

## Methodology for Classifying New Sales

- f. When making new sales, how does MP decide whether to classify the sale as "due to loss of load" versus an "asset-based" sale that counts toward margin credits? How does MP determine whether a sale is directly associated with lost load or not?
- g. If a trader has the option to make either a sale due to loss of load or an asset-based sale, are sales due to lost load given priority?
- h. What does MP mean that sales due to loss of load will be "allocated in accordance with existing methods" rather than through the FAC? Are these methods consistent with how Xcel and Otter Tail treat sales due to loss of load?

## **RESPONSE:**

### 2020 Margin Credit

- a. *Confirm that loss of customer load in 2020 will not impact the estimated \$10 million margin credit for 2020.*

The Company confirms that loss of load sales will not impact the \$10 million in margin credits expected for 2020. However, as explained in the Company's response to subpart (b) of this request, there are other factors that could impact the \$10 million in margin credits expected in 2020 including MISO market sales and generation performance.

The \$10 million in margin credits expected for 2020 are largely gained through bilateral asset-based sales that have already been made (this is noted in Schedule 1 to the Direct Testimony of Company witness Julie I. Pierce in Docket No. E015/GR-19-442). The "firm" sales are classified as bilateral sales and the "non-firm" sales are classified as MISO market sales, as stated in Schedule 1 to Ms. Pierce's Direct Testimony. The "non-firm" sales for 2020 (the smallest bucket of sales) are more uncertain in nature and only made if there is daily excess generation available to sell.

Asset-based sales and sales due to loss of load are separately tracked in our OATI webTrader software and are often made at different times. The Company identifies and confirms the reason for the sale (whether due to loss of load or asset-based) before the sale is made. These loss of load sales do not affect the expectation for margin credit from asset-

based sales, as they are made as a replacement for the load that would have been there, thereby maintaining a steady outlook for asset-based sales.

- b. *Explain what other factors may affect the estimated \$10 million 2020 margin credit and identify whether these factors would tend to reduce or increase the credit.*

Factors that could reduce or increase the \$10 million of margin credit for 2020 would be a change in MISO market prices, the megawatts (“MW”) of generation available to sell due to factors other than loss of load, or the generator performance, sourcing costs, and MISO costs. For example, if sourcing costs or MISO transaction costs go up, the margin credit could be reduced. If market prices or the MW of available generation go up, the credit could increase.

## **2021 Margin Credit**

- c. *What is MP’s current forecast of asset-based wholesale margins for 2021?*

At this time, Minnesota Power has not yet developed a forecast for margin credits for 2021 that could be applied to the 2021 FAC Forecast that was filed on May 1, 2020. If the Commission approves Minnesota Power’s Emergency Petition for Approval to Move Asset-Based Wholesale Sales Margin Credits to the Fuel Adjustment Clause and Resolve the Rate Case (“Petition”), Docket No. E015/M-20-429, Minnesota Power may file an updated 2021 FAC Forecast with an asset-based wholesale margin credit estimate for 2021.

- d. *Could loss of customer load affect the 2021 margin credit? How?*

No. As stated in the Company’s response to subpart (a) above, the margin credit and loss of load sales are separate and should not impact margin credit estimates. The loss of load sales are made as a replacement for the load that would have been present.

- e. *Explain what factors other than lost load may affect the 2021 margin credit and identify whether these factors would tend to reduce or increase the credit.*

Please see the Company’s response to subpart (b) above.

## **Methodology for Classifying New Sales**

- f. *When making new sales, how does MP decide whether to classify the sale as “due to loss of load” versus an “asset-based” sale that counts toward margin credits? How does MP determine whether a sale is directly associated with lost load or not?*

As noted in the Company’s response to subpart (a) above, asset-based sales and loss of load sales have different characteristics, and the reason for a sale (whether for loss of load or asset-based) is identified, vetted, and specified in the Company’s systems before the sale

is made. The company clearly identifies the customer loss of load prior to making a loss of load sale, which is included in the documentation and decision making.

- g. *If a trader has the option to make either a sale due to loss of load or an asset-based sale, are sales due to lost load given priority?*

By the time sales are made, the reason for the sale (i.e., the reason the MW are available for sale) has already been identified as either a loss of load or asset-based sale. To the extent the loss of load and asset-based sales are needed at the same time, the market sale price should be the same and the sales should be made at the same price.

- h. *What does MP mean that sales due to loss of load will be “allocated in accordance with existing methods” rather than through the FAC? Are these methods consistent with how Xcel and Otter Tail treat sales due to loss of load?*

Minnesota Power currently makes sales due to loss of load, but the revenues from these sales do not presently go through the FAC. As part of the Company’s Petition to move asset-based sale margin credits to the FAC in Docket No. E015/M-20-429, Minnesota Power does not propose any changes to its approved, existing treatment of loss of load sales outside of the FAC. Since Minnesota Power is not proposing a change to its approved methodology for loss of load sales, it has not investigated how Xcel Energy and Otter Tail treat sales due to loss of load.

**OAG No. 6002**

**State Of Minnesota  
Office of the Attorney General  
Utility Information Request**

*Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota* **MPUC Docket No.** E-015/GR-19-442

*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.** E-015/M-20-429

**Requested from:** Minnesota Power

**Requested By:** Peter Scholtz  
**Telephone:** (651) 757-1473

**Date of Request:** April 28, 2020  
**Due Date:** May 8, 2020

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Reference: "Proposed Rate Case Resolution Impacts by Rate Class - DRAFT - April 10 2..." at page 1.

In Step 1 of its proposal, MP applies a 5.75% overall increase to each class's energy rate to remove margin credits from base rates.

- a. Explain, step by step, how the 5.75% overall increase was derived, and include a live Excel spreadsheet demonstrating the calculation of the overall increase.
- b. Does the 5.75% overall increase rely on an assumption that Large Power base rates include the EITE credit? If so, recalculate the overall increase using Large Power revenues without the EITE credit. Provide all assumptions and supporting data used, including, if applicable, a live Excel spreadsheet demonstrating the calculation of the overall increase.

**RESPONSE:**

- a. OAG IR 6002.01 Attach includes the live Excel spreadsheet used to calculate Attachment A of the Company's April 23, 2020 filing in Docket No. E015/M-20-429. Cell G-14 shows how the 5.75% overall increase was calculated. The 5.75% is equal to \$35.8 million of margin credits currently included in base rates divided by \$623.1 million of total present rate revenue requirements from Minnesota Power's previous rate case (Docket No. E015/GR-16-664). To see how the 5.75% overall increase was applied by customer class, please refer to Step 2 in Attachment E in Minnesota Power's April 30, 2020, Supplemental Information filing in Docket No. E015/M-20-429.

- b. The 5.75 % increase was applied to Large Power present rates including the EITE credit. If the \$16,853,579 of EITE credits included in Large Power revenue were removed (increasing total present rate revenue from \$623.1 million to \$639.9 million), the overall increase would be 5.59% (\$35.8 million / \$639.9 million).



The Office of  
**Minnesota Attorney General Keith Ellison**  
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May 11, 2020

Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101

**Re: *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota***  
**MPUC Docket No. E-015/GR-19-442**

***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. E-015/M-20-429**

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. An Affidavit of Service is also enclosed.

Sincerely,

/s/ **Peter G. Scholtz**

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

[peter.scholtz@ag.state.mn.us](mailto:peter.scholtz@ag.state.mn.us)

Enclosure

**AFFIDAVIT OF SERVICE**

**Re: *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota***  
**MPUC Docket No. E-015/GR-19-442**

***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. E-015/M-20-429**

STATE OF MINNESOTA    )  
  ) ss.  
COUNTY OF RAMSEY    )

I, JUDY SIGAL, hereby state that on the 11<sup>th</sup> day of May, 2020, I e-filed with eDockets ***Comments of the Minnesota Office of the Attorney General—Residential Utilities Division*** and served the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

*/s/ Judy Sigal*  
JUDY SIGAL

Subscribed and sworn to before me  
this 11th day of May, 2020.

*/s/ May Vang*  
Notary Public

My Commission expires: January 31, 2021.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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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@otpco.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
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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
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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
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Barbara	Gervais	tofermn@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
Annette	Henkel	mul@mnuutilityinvestors.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	Keelac	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
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
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
Annie	Levenson Falk	annief@cubminnesota.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	kmaini@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 7 h 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@stbel.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@stbel.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	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
Eilanne	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@schulteassociates.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 7 h P I 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	restaffon@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
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442__Official CC Service List
Karen	Tumboom	karen.tumboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442__Official CC Service List
Kodi	Verhalen	kverhalen@tatlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442__Official CC Service List
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442__Official CC Service List
Scott	Zahorik	scottzahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	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
Christopher	Anderson	canderson@allte.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-429_M-20-429
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_20-429_M-20-429
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_20-429_M-20-429
Peter	Beithon	pbeithon@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-429_M-20-429
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
David F.	Boehm	dboehm@bklawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_20-429_M-20-429
Elizabeth	Brama	ebrama@taflaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_20-429_M-20-429
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	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
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_20-429_M-20-429
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300  Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_20-429_M-20-429
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_20-429_M-20-429
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Dahlberg	davedahlberg@nweco.com	Northwestern Wisconsin Electric Company	P.O. Box 9 104 South Pine Street Grantsburg, WI 548400009	Electronic Service	No	OFF_SL_20-429_M-20-429
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave  Minneapolis, MN 55403	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
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_20-429_M-20-429
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_20-429_M-20-429
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-429_M-20-429
John R.	Gasele	igasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Bruce	Gerhardson	bgerhardson@otpcco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_20-429_M-20-429
Barbara	Gervais	toftenn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_20-429_M-20-429
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	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
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-429_M-20-429
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_20-429_M-20-429
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_20-429_M-20-429
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	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
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_20-429_M-20-429
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502  Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Travis	Kolari	N/A	Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	OFF_SL_20-429_M-20-429
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Carmel	Laney	carmel.laney@stbel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	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
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-429_M-20-429
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Annie	Levenson Falk	annief@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-429_M-20-429
Amy	Liberkowski	amy.a.liberkowski@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-429_M-20-429
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	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
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-429_M-20-429
Kavita	Maini	kmairi@wi.r.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-429_M-20-429
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7 h St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
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_20-429_M-20-429
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_20-429_M-20-429
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	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
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_20-429_M-20-429
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_20-429_M-20-429
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_20-429_M-20-429
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_20-429_M-20-429
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_20-429_M-20-429
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_20-429_M-20-429
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Ins itute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-429_M-20-429

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Samantha	Norris	saman.hanorris@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
Eilanne	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

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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@citizenstfed.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

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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 7 h 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 8th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-429_M-20-429

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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
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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	Tumboom	karen.tumboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_20-429_M-20-429
Kodi	Verhalen	kverhalen@taflaw.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

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Mary	Wolter	mary.wolter@weceenergygroup.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	scottzahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_20-429_M-20-429