

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Docket No. E015/M-20-429

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

PETITION

INTRODUCTION

Pursuant to Minn. Stat. §§ 216B.03 and 216B.16, subd. 7, and Minn. Rules 7825.2390 through 7825.2920 and 7829.1300, Minnesota Power (or the “Company”), hereby petitions the Minnesota Public Utilities Commission (“Commission”) for an order approving the recovery of asset-based wholesale margin credits through Minnesota Power’s fuel adjustment clause (“FAC”)¹ rather than base rates (the “Petition”). Minnesota Power submits this Petition to achieve resolution of its currently pending retail rate case, and discontinuation and refund of interim rates.

As the Commission is aware, Minnesota Power is currently in the middle of a general retail rate case proceeding (Docket No. E015/GR-19-442), which was filed on November 1, 2019 (“2019 Rate Case”). In the months following this filing, the first cases of the severe acute respiratory syndrome coronavirus 2 (commonly referred to as “COVID-19”) were reported abroad. Since that time, the COVID-19 outbreak has continued to grow and is now impacting the health and financial well-being of people around the country, the State, and in Minnesota Power’s service territory. As of last month, the Governor of Minnesota has declared a peacetime state of emergency and has issued executive orders directing Minnesotans to stay home.² On April 8, the Stay-at-Home

¹ Certain stakeholders use the acronym FCA or fuel clause adjustment; both acronyms refer to the same rate charged to customers.

² Minn. Stat. § 12.31, subd. 2; Minn. Exec. No. 20-01 (Walz), *Emergency Executive Order 20-01 Declaring a Peacetime Emergency and Coordinating Minnesota's Strategy to Protect Minnesotans from COVID-19* (Mar. 13, 2020); Minn. Exec. 20-20 (Walz), *Emergency Executive Order 20-20 Directing Minnesotans to Stay at Home* (Mar. 25, 2020).

executive order was extended at least through May 4, 2020.³ While these orders are aimed at limiting the spread of COVID-19, they are also having financial impacts as businesses are shuttered or idled, and employees are furloughed or laid-off. The long-term effects of this pandemic remain uncertain for all, with the health, safety, and well-being of our communities being of primary importance.

In light of this uncertainty and the health, safety, and financial issues facing all its stakeholders, Minnesota Power has been seeking proactive means of reducing the burden of rate case proceedings, and of its requested rate increase overall, on its stakeholders. On March 17, 2020, the Company submitted a letter in Docket No. E015/GR-19-442, advising recognition of these impacts and that it was engaging stakeholders on a path forward.⁴ Minnesota Power subsequently worked with parties to the 2019 Rate Case to propose scheduling extensions both allowing the Company to focus on the key services that are more important than ever to our communities. This letter also discussed challenges associated with gathering meaningful public input given the current restrictions on large gatherings and the other more pressing concerns of customers. That extension was granted on April 2, 2020.⁵

Since late March, Minnesota Power has also been engaging with stakeholders on a proposal that will allow Minnesota Power to resolve its pending rate case. Minnesota Power now submits this Petition, proposing to address its key rate case driver (the April 30, 2020 expiration of a large market contract (“LMC”)) in a manner that will allow the Company to suspend its current rate case and provide immediate rate relief to retail customers through lower interim rates, then ultimately withdraw its case and refund collected interim rates. At this time, the following parties to the rate case proceeding have indicated support for Minnesota Power’s proposal: the Department of Commerce, Division of Energy Resources, Citizens Utility Board, Energy CENTS Coalition, International Brotherhood of Electrical Workers Local 31, and the Clean Energy Organizations (Fresh Energy, Clean Grid Alliance, Sierra Club, and Minnesota Center for Environmental Advocacy). Minnesota Power has also had productive discussions with the other parties to the

³ Minn. Exec. 20-33 (Walz), *Emergency Executive Order 20-23 Extending Stay at Home Order and Temporary Closure of Bars, Restaurants, and Other Places of Public Accommodation* (Apr. 8, 2020).

⁴ *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E015/GR-19-442, MINNESOTA POWER LETTER (March 20, 2020).

⁵ *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E015/GR-19-442, FIFTH PREHEARING ORDER (April 2, 2020).

currently-pending rate case, some of whom continue to evaluate the proposal as of this filing, and defers to each party to submit comments on the Petition as they may choose.

The heart of Minnesota Power's Petition is a request for Commission approval to shift recovery of the Company's energy and capacity asset-based wholesale sales margins ("Margin Credits") from base rates to the FAC effective May 1, 2020, consistent with how other electric utilities account for these Margin Credits. The Company's proposal to account for these Margin Credits through the FAC will allow annual review of these amounts to ensure that customers receive timely benefit of actual Margin Credits on an ongoing basis, rather than only receiving a representative test year amount between rate cases as customers currently experience. Further, the May 1, 2020 effective date aligns with the April 30, 2020 expiration of the large market contract that is the key impetus for Minnesota Power's 2019 Rate Case.

While the Commission considers Minnesota Power's Petition, the Company is filing a letter in this docket and the 2019 Rate Case docket (Docket No. E015/GR-19-442) requesting that:

- The Administrative Law Judge ("ALJ") immediately suspend the 2019 Rate Case procedural schedule; and
- The Commission reduce interim rates effective May 1, 2020,⁶ from the current 5.8 percent interim increase to 4.1 percent,⁷ during the period the Commission assesses this Petition.

More permanently, if the Commission approves this Petition, Minnesota Power will seek to withdraw its rate case, refund all interim rates collected, and adjust base rates and the FAC to effectuate moving Margin Credits to the FAC effective May 1, 2020. For 2020, the Company anticipates that approval of this Petition would result in a total net revenue requirement increase (annualized base rates plus FAC) of 2.8 percent, compared to rates in effect prior to January 1,

⁶ While the Company may not be able to implement this reduction on May 1, 2020, due to the timing of this filing and the logistical delays facing all stakeholders during these unusual times, the Company will track and verify that the amounts returned to customers upon Commission approval of this Petition reflect a May 1, 2020 effective date.

⁷ The 4.1 percent increase above the rates that were in effect on December 31, 2019 (before implementation of interim rates), is equal to the long-term projected net impact, beginning May 1, 2020, of the combined base rates and the FAC after moving Margin Credits to the FAC. However, the interim rate reduction from 5.8 percent to 4.1 percent, effective May 1, 2020, would result in the average residential retail customer immediately saving approximately \$0.95 per month in electric costs. The calculation of the average residential customer bill under this proposal is shown on **Attachment B** to this Petition.

2020, all else remaining equal.⁸ The net change beyond 2020, currently projected to be approximately 4.1 percent (all else being equal), will be tied to actual Margin Credits, so no estimating will be required and neither the Company nor its customers will receive any more or less than actual Margin Credits.

It is important to note that this net change in base rates plus FAC costs is driven solely by actual changes in Margin Credits, rather than any Company increase in costs or capital requests. Moreover, this increase is substantially lower than the current interim rate increase of 5.8 percent, and even farther below the Company's final rate request increase of 10.59 percent. Additionally, the refund of all interim rates collected between January 1 and April 30, 2020, alone, is expected to return approximately \$12 million to customers.

Minnesota Power proposes other provisions in this Petition that are intended to further support customers during this time. First, the Company will commit that it will not file a request for authority to increase electric service rates before November 1, 2021, except in the event of certain unexpected, utility-changing circumstances. Specifically, Minnesota Power needs the flexibility to determine whether to file a rate case if an Energy-Intensive Trade-Exposed ("EITE") customer shuts down or idles at least 50 megawatts ("MW") below their actual load as of April 20, 2020 for a period of at least three months. If this load reduction occurs earlier than November 1, 2021, the Company will provide the Commission with at least 90 days advance notice before filing a rate case. However, in no event will the Company file a rate case before March 1, 2021.

Second, the Company proposes to defer residential rate design issues of primary importance to a time-of-day docket (Docket No. E015/M-12-233) and to maintain the current EITE rate through February 1, 2021. This feature is intended to maintain the status quo for purposes of this Petition and rate case withdrawal, and is not intended to alter any party's opportunity to propose elsewhere to further extend or modify the EITE rate.

Ultimately, Minnesota Power is focused on supporting our customers as they face the personal and financial challenges, as well as the uncertainty, posed by the rapid advancement of COVID-19. Our proposal is designed to maximize and quickly provide benefits to customers

⁸ This amount assumes that, upon approval of this Petition and refund of all interim rates, base rates and FAC levels for January 1 through April 30, 2020 will be essentially equivalent (all else being equal) to rates that were in effect prior to January 1, 2020, resulting in a 0 percent increase. Beginning May 1, 2020, when the LMC expires, the Company projects a net change of 4.1 percent. Taken together, this results in an annual change for 2020 of 2.8 percent. See **Attachment A** to this Petition.

while protecting the financial health of our business. To that end, Minnesota Power respectfully requests that the Commission resolve this Petition within 45 days. To achieve this, Minnesota Power requests that initial comments on this Petition be due no later than May 11, 2020, with reply comments due within seven days thereafter. This expedited timeline will allow Minnesota Power to provide much-needed rate relief to our customers as quickly as possible.

We recognize that the Commission and our stakeholders need to understand the financial results of this proposal as compared to our overall rate case requests in order to evaluate this proposal. **Attachment A** to this Petition identifies our overall rate structure as of December 31, 2019, approved interim rates, proposed final rates, and the overall net 2020 base rate and FAC results included in this Petition. Minnesota Power has worked with the parties to our 2019 Rate Case to develop agreement on these terms, but will defer to the parties to reflect their positions in their independent comments. Meanwhile, the Company commits to continuing engagement with the parties to the rate case and other stakeholders as the Commission considers this Petition.

PROCEDURAL MATTERS

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. Rule 7829.1300, Minnesota Power provides the following required general filing information.

A. Summary of Filing (Minn. Rule 7829.1300, subp.1)

A one-paragraph summary of the filing accompanies this Petition pursuant to Minn. Rules 7829.1300, subp. 1.

B. Service on Other Parties (Minn. Rule 7829.1300, subp. 2)

Pursuant to Minn. Stat. § 216.17, subd. 3 and Minn. Rule 7829.1300, subp. 2, Minnesota Power has served a copy of this filing on the Minnesota Department of Commerce, Division of Energy Resources; the Office of the Attorney General, Residential Utilities and Antitrust Division; and all persons on the service list for the currently-pending electric rate case (Docket No. E015/GR-19-442). A summary of the filing prepared in accordance with Minn. Rules 7829.1300, subp. 1 is being served on Minnesota Power's general service list and on the official service list in the Company's 2020 Fuel Forecast Report docket (Docket No. E015/AA-19-302).

C. Name, Address and Telephone Number of Utility (Minn. Rule 7829.1300, subp. 3(A))

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D. Name, Address and Telephone Number of Utility Attorneys (Minn. Rule 7829.1300, subp. 3(B))

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E. Date of Filing and Date Proposed Miscellaneous Rate Change Will Take Effect (Minn. Rule 7829.1300, subp. 3(C))

The date of this filing is April 23, 2020. The filing requests approval of recovery of the Company's asset-based wholesale margin credits in the FAC, rather than base rates, effective May 1, 2020.

F. Statute Controlling Schedule for Processing the Filing (Minn. Rule 7829.1300, subp. 3(D))

The filing described herein is made pursuant to Minn. Stat. §§ 216B.03 and 216B.16, subd. 7. These statutes do not prescribe a schedule for processing the filing. This filing is a miscellaneous tariff filing as defined by Minn. Rule 7829.0100, subp. 11. Under Minn. Rule 7829.1400, comments on a miscellaneous filing are due within 30 days of its filing, with reply comments due 10 days thereafter. However, Minnesota Power respectfully requests that the Commission resolve this Petition on an expedited basis, or within 45 days—a timeline granted to analogous requests by other utilities.⁹ Minnesota Power specifically requests that the Commission

⁹ See *In the Matter of the Petition of N. States Power Co d/b/a Xcel Energy for Approval of True-Up Mechanisms*, Docket No. E002/M-19-688, ORDER APPROVING TRUE-UPS AND REQUIRING XCEL TO WITHDRAW ITS NOTICE OF

solicit comments on an expedited basis, with initial comments due no later than May 11, 2020, and reply comments due seven days after the initial comment due date.

An expedited resolution is warranted as the Company, concurrent with the filing of this Petition, is requesting a temporary suspension of the procedural schedule in the Company's pending rate case proceeding (Docket No. E015/GR-19-442). If the Commission declines to grant this Petition, the Company must continue to litigate its general rate case. Therefore, it is important to promptly resolve this Petition to avoid the risk of a significant delay in the rate case that could result if this Petition remains unresolved.

G. Utility Employee Responsible for Filing (Minn. Rule 7829.1300, subp. 3(E))

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H. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 3(F))

The action requested of the Commission will have the effect of moving Margin Credits to the FAC instead of accounting for them in base rates. The Company's proposal to place the Margin Credits in the FAC instead of in base rates is allowed under Minn. Stat. § 216B.16, subd. 7 and Minn. Rule 7825.2390 through 7825.2920. If the Commission determines any rule variance is required to implement this change, Minnesota Power provides variance justification later in this Petition.

This proposal will provide immediate rate relief to Minnesota Power's customers by reducing interim rates from 5.8 percent to 4.1 percent while the Petition is pending before the Commission. If the Commission approves the Company's Petition, customers will receive overall rate relief in 2020 through a reduction of the currently-approved 5.8 percent annual total interim rate increase to an approximately 2.8 percent annual increase recovered through base rates and the new FAC charge that includes Margin Credits. Further, if the Petition is approved, Minnesota

CHANGE IN RATES AND INTERIM PETITION at 2 (Mar. 13, 2020) (Commission heard and orally approved the proposal on December 12, 2019, less than 45 days after Xcel Energy filed its Petition on November 1, 2019).

Power anticipates withdrawing its rate case and request for a 10.59 percent final rate increase, and refunding interim rates for total refunds to customers of approximately \$12 million.¹⁰ This proposal will also provide longer-term rate relief to Minnesota Power’s customers by allowing the more timely return of Margin Credits to customers through the FAC. More details about the overall proposal, including the additional information required under Minn. Rule 7829.1300, subp. 3(F), are included throughout this Petition.

I. Service List (Minn. Rule 7829.0700)

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PROPOSAL

A. Description and Purpose of Filing

As described earlier in this Petition, Minnesota Power seeks approval to recover energy and capacity asset-based wholesale margin credits (collectively “Margin Credits”) through the FAC, effective May 1, 2020. If this proposal is accepted, Minnesota Power will withdraw its currently pending general rate case that was filed on November 1, 2019 in Docket No. E015/GR-19-442 and refund all interim rates.

The impetus for this Petition is the current COVID-19 pandemic that is presenting unprecedented health and financial challenges for everyone around the world. In response to this

¹⁰ The resolution includes reducing the interim rate increase to 4.1 percent as of May 1, 2020, until the Commission approves this Petition. Upon Commission approval of inclusion of the Margin Credits in the FAC, effective May 1, 2020, the Company will prepare a subsequent compliance filing comparing the amounts collected through interim rates prior to implementation of this proposal to the amount that would need to be collected to implement changes to base rates plus the FAC. The net difference between these amounts is currently estimated to result in a refund to customers of approximately \$12 million. Since interim rates effective May 1, 2020 are intended to approximate the effect of moving Margin Credits from base rates to the FAC effective May 1st, the “net difference” (the refund amount) effectively represents the estimated interim rates collected for the period between January 1, 2020 and April 30, 2020.

this global pandemic, the Governor of Minnesota has issued a peacetime state of emergency and executive orders directing Minnesotans to stay at home.¹¹ While these declarations are aimed at slowing the spread of this aggressive virus, they have also resulted in many businesses closing their doors and leaving many of their employees out of work. The long-term effects of this pandemic and the global response remain to be seen. Meanwhile, the health, safety, and well-being of Minnesotans and our Minnesota communities remain of paramount importance.

Minnesota Power is acutely aware of the personal and financial concerns that our customers and communities face in light of the COVID-19 public health crisis. Even if emergency orders are lifted, the longer-term consequences of the pandemic are uncertain at best. The purpose of this filing is, therefore, to help alleviate our customers' financial concerns by proposing a mechanism that will result in an overall reduction in the rates currently paid by our customers, while enabling Minnesota Power to be a financially healthy utility and maintain its essential operations.

B. Specific Requests

1. Transition Recovery of Margin Credits to the FAC

Minnesota Power's fundamental request is to account for Margin Credits in the FAC going forward, rather than in base rates, effective May 1, 2020.

By way of background, Margin Credits are created when energy or capacity is sold to the MISO market or a specific counterparty through a bilateral contract and that energy or capacity is supported by (sourced from) generation assets that are paid for by Minnesota Power's customers in their base rates. The margins from these sales are credited back to Minnesota Power customers through their base rates as a Margin Credit, and thus reduce base rates. Currently, in each rate case the Company forecasts its expected asset-based wholesale sale margins and adjusts this credit to an expected level given the current generation supply and customer load. Whatever representative amount of Margin Credits is approved in a rate case is the level customers receive as a credit in the years between rate cases.

¹¹ Minn. Stat. § 12.31, subd. 2; Minn. Exec. No. 20-01 (Walz), *Emergency Executive Order 20-01 Declaring a Peacetime Emergency and Coordinating Minnesota's Strategy to Protect Minnesotans from COVID-19* (Mar. 13, 2020); Minn. Exec. 20-20 (Walz), *Emergency Executive Order 20-20 Directing Minnesotans to Stay at Home* (Mar. 25, 2020); Minn. Exec. 20-33 (Walz), *Emergency Executive Order 20-23 Extending Stay at Home Order and Temporary Closure of Bars, Restaurants, and Other Places of Public Accommodation* (Apr. 8, 2020).

A key driver of Minnesota Power's current rate case is the significant decrease in the Margin Credits projected for 2020, as compared to prior years.¹² Specifically, as described in testimony and in the Company's Interim Rate Petition in the 2019 Rate Case, the Margin Credits for 2020 are estimated to be \$11.5 million Total Company (\$10 million MN Jurisdictional) as compared to the \$43 million Total Company (\$35.8 MN Jurisdictional) in Margin Credits approved in the Company's 2016 rate case.¹³ This reduction is largely due to the April 30, 2020 expiration of a long-term sales contract with Basin Electric Power Cooperative ("Large Market Contract" or "LMC"), a reduction in surplus energy available for sale due to an increase in the percentage of renewable generation in Minnesota Power's portfolio, and the lower sales prices at times when the Company has surplus generation.¹⁴

The asset-based wholesale sales or Margin Credits that the Company proposes to recover in the FAC are separate from the wholesale sales that the Company makes when there is a loss of customer load. These customer loss sales are separately tracked by the Company in its OATI webTrader™ software. The baseline amount of sales due to customer loss of load will be the amount of sales approved by the Commission as part of Minnesota Power's 2016 rate case (Docket No. E015/GR-16-664) unless and until this amount is reset in a future proceeding. Sales due to customer loss of load will continue to be allocated in accordance with existing methodologies rather than through the FAC.

In this Petition, however, Minnesota Power proposes to move the Margin Credits from base rates to the FAC, effective May 1, 2020, to coincide with the expiration of the Large Market Contract. Minn. Stat. § 216B.16, subd. 7, authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Under the new FAC process implemented on January 1, 2020 and Minn. Stat. § 216B.16, subd. 7, Minnesota's rate-regulated electric utilities submit an annual forecast filing for the upcoming year to adjust their FAC rates to pass fuel costs and other approved expenses through the FAC.¹⁵ A utility will charge the Commission-approved

¹² *In the Matter of the Application of Minn. Power for Auth. to Increase Rates for Elec. Serv. in Minn.*, Docket No. E015/GR-19-442, DIRECT TESTIMONY OF JULIE I. PIERCE at 11:24-12:3 (Nov. 1, 2019).

¹³ *Id.* at 29:16-28. These are annualized amounts starting May 1, 2020, after expiration of the LMC on April 30, 2020.

¹⁴ *Id.* at 12:1-8.

¹⁵ *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E-999/CI-03-802, ORDER APPROVING NEW ANNUAL FUEL CLAUSE ADJUSTMENT REQUIREMENTS AND SETTING FILING REQUIREMENTS (Dec. 19, 2017); *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E-999/CI-03-802, ORDER

forecasted rate unless the utility can show a significant unforeseen impact on those rates during the forecasted year.¹⁶ At the end of the forecasted year, utilities subsequently file an annual true-up in March that shows the difference between the utilities' forecasted FAC rates and the actual FAC rates incurred during the year, and will refund any over collections or show prudence of costs before recovering under collections.¹⁷ Both the annual forecast filing and the annual true-up filing are reviewed for accuracy and prudence by multiple stakeholders and are subject of multiple rounds of comments before coming to the Commission for review.

On June 24, 2019, Minnesota Power filed its 2020 Fuel Forecast Report in Docket No. E015/AA-19-302, requesting approval of its 2020 fuel forecast for purposes of setting FAC rates for January 2020 through December 2020.¹⁸ On November 14, 2019, the Commission accepted the Company's 2020 fuel forecast, subject to a true-up in 2021.¹⁹ As noted above, a utility's fuel forecast can be adjusted during the year if a utility can demonstrate that there are new costs that have a significant unforeseen impact on the fuel costs such that an adjustment is needed prior to the subsequent year's true-up.²⁰ The Commission has set forth a four-part test to determine whether new costs have a significant unforeseen impact: (1) the new costs results in a more than five percent change in the total fuel costs used to set the forecasted FAC rate, (2) the costs were unforeseeable and outside the utility's control, (3) are expected to continue for the remainder of the year, and (4) are reasonable to pass on to ratepayers.²¹ The Company's proposed inclusion of Margin Credits in the Company's 2020 fuel forecast meets this four-part test.

First, inclusion of Margin Credits in the FAC will result in a more than five percent change to total fuel costs used in Minnesota Power's 2020 fuel forecast. If the Commission grants this Petition, Margin Credits will serve as a credit to the Company's total monthly fuel cost thus

REVISING IMPLEMENTATION DATE, ESTABLISHING PROCEDURAL REQUIREMENTS, AND VARYING RULE (Dec. 12, 2018).

¹⁶ *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 THE NEW FUEL CLAUSE ADJUSTMENT PROCESS at 1 (Dec. 12, 2018).

¹⁷ *Id.*

¹⁸ *In the Matter of the Petition of Minnesota Power for Approval of its 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Docket No. E015/AA-19-302, MINNESOTA POWER'S 2020 FORECAST FILING (June 24, 2019).

¹⁹ *In the Matter of the Petition of Minnesota Power for Approval of its 2020 Annual Fuel Forecast and Monthly Fuel Cost Charges*, Docket No. E015/AA-19-302, ORDER (Nov. 14, 2019).

²⁰ *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 at 4-5 (Jun. 12, 2019).

²¹ *Id.*

reducing the total fuel costs passed along to customers. The Company estimates that Margin Credits in the FAC will be approximately \$10 million for the remaining eight months of 2020 (i.e., May to December 2020). Spreading this \$10 million across these eight months will result in a more than five percent reduction in the Company's forecasted monthly total fuel costs for 2020.

With regard to the second factor, while Margin Credits are a routine and known credit, it is the unforeseen global COVID-19 pandemic that has spurred the Company's request to update its 2020 fuel forecast. The inclusion of Margin Credits in this year's fuel forecast is a mechanism by which the Company can provide immediate rate relief to customers in a time of an unpredicted economic downturn brought about by the current public health crisis.

Third, the Margin Credits are expected to continue throughout the remainder of 2020 and into the future as the Company continues to make asset-based wholesale sales for the benefit of customers.

With regard to the fourth factor, it is reasonable to pass these Margin Credits to customers. In fact, this proposed treatment has several benefits for Minnesota Power's customers. Most importantly, inclusion of these credits in the 2020 fuel forecast will provide immediate rate relief to customers. Specifically, if the Commission accepts the Company's Petition and allows inclusion of Margin Credits in the FAC effective May 1, 2020, the Company's estimated total percent rate increase (base rates plus FAC) for 2020 would be 2.8 percent, taking into account the months of January through April 2020 when the LMC is still in effect, as well as the expiration of the LMC as of April 30, 2020. This 2.8 percent combined change is significantly lower than both the Company's approved interim rate increase of 5.8 percent and the Company's proposed final rate increase of 10.59 percent. Further, any increase compared to current rates would simply reflect the actual changes in Margin Credits due to the LMC expiration (i.e., Minnesota Power is not seeking any additional capital or O&M costs, nor any change to the Company's rate of return), with upside for the customers if the Company is able to attract new contracts in the future. Actual net changes beyond 2020 will depend on the Margin Credits available to pass to customers through the FAC. Current estimates, all else being equal, indicate the net changes after May 1, 2020 will be approximately 4.1 percent over the rates effective December 31, 2019.²² **Attachment A** to this Petition details these calculations.

²² As part of this move of Margin Credits from base rates to the FAC, Minnesota Power will evaluate the overall calculation of these credits to ensure they are properly and appropriately allocated to the Company's rate classes.

The inclusion of Margin Credits in the FAC also benefits customers in that customers receive a more timely and accurate accounting of these credits. Under the current system, customers must wait until a general rate case before there is any adjustment to the Company's Margin Credits. By including the Margin Credits in base rates, there is almost always a difference between actual Margin Credits and the amounts flowing through rates – either to the benefit or detriment of customers. The Company's current rate case seeks to adjust base rates to reflect the expiration of the LMC. By instead flowing Margin Credits through the FAC, future adjustments will be made on an annual basis, ensuring customers are able to share in the benefits of any subsequent increases in Margin Credits (such as through new contracts after the end of the 2020 calendar year) prior to a general rate case. This treatment therefore ensures accurate and timely accounting of the Company's Margin Credits, such that customers receive the full value of any asset-based wholesale margins that Minnesota Power earns each year. Put differently, this approach removes reliance on whether test year amounts are in fact representative, passes the benefits of any new, future asset-based wholesale margin credits to customers more quickly, and ensures neither the utility nor the customer pays any more or less than actual revenues would warrant.

This treatment is also consistent with how other utilities account for margin credits. Xcel Energy first obtained Commission approval to flow margin credits through the FAC in its 2005 rate case²³ and Otter Tail Power Company obtained approval for this treatment in its 2010 rate case.²⁴ No party contested this treatment in either of these instances.²⁵ The same rationale that

²³ *In the Matter of the Application of N. States Power Co. d/b/a Xcel Energy for Auth. to Increase Rates for Elec. Serv. in Minn.*, Docket No. E002/GR-08-1065, FINDINGS OF FACT, CONCLUSIONS OF LAW, AND ORDER at 7 (Oct. 23, 2009); *In the Matter of the Application of N. States Power Co., a Minn. Corp., for Auth. to Increase Rates for Elec. Serv. in Minn.*, Docket No. E002/GR-08-1065, FINDINGS OF FACT, CONCLUSIONS, AND RECOMMENDATION at 40-41 (Aug. 24, 2009).

²⁴ *In the Matter of the Application of Otter Tail Power Co. for Auth. to Increase Rates for Elec. Util. Serv. in Minn.*, Docket No. E017/GR-10-239, FINDINGS OF FACT, CONCLUSIONS, AND ORDER at 7 (Apr. 25, 2011); *In the Matter of the Application of Otter Tail Power Co. for Auth. to Increase Rates for Elec. Util. Serv. in Minn.*, Docket No. E017/GR-10-239, FINDINGS, CONCLUSIONS, AND RECOMMENDATION, at 87-88 (Feb. 14, 2011).

²⁵ *In the Matter of the Application of N. States Power Co., a Minn. Corp., for Auth. to Increase Rates for Elec. Serv. in Minn.*, Docket No. E-002/GR-08-1065, FINDINGS OF FACT, CONCLUSIONS, AND RECOMMENDATION at 40-41 (Aug. 24, 2009) (“Xcel, OES, and MCC agree that asset based margins should continue to be credited to the ratepayers through the fuel clause adjustment. No change in procedures is being requested by any party.”); *In the Matter of the Application of Otter Tail Power Co. for Auth. to Increase Rates for Elec. Util. Serv. in Minn.*, Docket No. E017/GR-10-239, FINDINGS OF FACT, CONCLUSIONS AND RECOMMENDATION at 88 (Feb. 14, 2011) (“Accordingly, the parties are in agreement with OTP’s proposal to move the credit for asset-based margins from base rates to the FCA revenue requirement.”).

was present in those prior cases is present here, as summarized by in ALJ Report issued in Otter Tail Power Company's 2010 rate case:

This treatment would ensure accuracy of the credit for both customers and OTP, in that customers receive the full value of asset-based wholesale margins, and OTP would not experience over- or under- recoveries when changes to margins occur. Moreover, there would be no lag between a change in asset-based margins and the credit passed through to customers. In addition, with an FCA mechanism, as wholesale prices vary, the variations in the margin credit will correspond to similar variations in purchase power costs flowing through the FCA.²⁶

As inclusion of Margin Credits meets the four-part test to qualify as a significant unforeseen impact on Minnesota Power's 2020 fuel forecast, stakeholders have 30 days to file comments on this filing. A utility is permitted to implement the proposed rate following the 30-day notice period if no party objects to the revised rate.²⁷

However, as discussed, Minnesota Power seeks to implement the updated FAC rates, that include the Margin Credits, effective May 1, 2020, on an expedited schedule. Minnesota Power is not disputing the need for a notice and comment period on this Petition. Rather, Minnesota Power proposes that such comments be filed in this Petition docket, rather than the Company's 2020 Fuel Forecast Report docket (Docket No. E015/AA-19-302) given the potential impact on both Docket No. E015/AA-19-302 and the 2019 Rate Case docket.²⁸ Minnesota Power also requests that the Commission-ordered 30-day comment period be adjusted to the expedited schedule suggested in this Petition to allow a Commission decision on this Petition within 45 days from its filing.

The proposals in this Petition have been the subject of detailed discussion in the Company's 2019 Rate Case docket, such that no party will be prejudiced by and customers will benefit from expedited resolution. If this Petition is approved, Minnesota Power will make these revised FAC rates effective May 1, 2020, following Commission approval, and will provide compliance filings as requested by the Commission. The overall timing is critical, as it coincides with the Company's

²⁶ *In the Matter of the Application of Otter Tail Power Co. for Auth. to Increase Rates for Electric Util. Serv. in Minn.*, Docket No. E017/GR-10-239, FINDINGS, CONCLUSIONS, AND RECOMMENDATION at 88 (Feb. 14, 2011).

²⁷ *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, Docket No. E999/CI-03-802, ORDER APPROVING ADDITIONAL DETAILS OF NEW FUEL CLAUSE ADJUSTMENT PROCESS at 5 (Jun. 12, 2019).

²⁸ Minnesota Power is filing a notice today in its 2020 Fuel Forecast docket (Docket No. E015/AA-19-30) informing stakeholders of this Petition and that a notice and comment period will be set by the Commission in this docket.

requested effective date for a reduction in interim rates in its current rate case and the expiration of the Large Market Contract.

2. Rule Variance Request

Minnesota Power believes that its proposal to flow Margin Credits related to energy and capacity wholesale asset-backed sales through the FAC is consistent with the purpose of the FAC and should be approved. To this end, and as previously noted, the Commission has approved FAC treatment for other utilities without varying any particular rules. We recognize, however, that the existing FAC rules do not specifically delineate Margin Credits. To the extent the Commission determines that any variance of the FAC rules is needed to effectuate the Company's proposal, Minnesota Power requests such a rule variance.

Minnesota Rule 7825.2500(A) outlines that a public utility may file for an automatic adjustment of charges related to "changes in cost resulting from changes in the federally regulated wholesale rate for energy purchased and changes in the cost of fuel consumed in the generation of electricity." The "cost of fuel consumed in the generation of electricity" is defined in Minnesota Rule 7825.2400, subp. 9 as simply "the cost of fossil and nuclear fuel." Minnesota Power seeks a variance to these rules to note that Margin Credits from energy and capacity sales are credits to the cost of fuel in this definition. With the requested addition, Minnesota Rule 7825.2600 will produce the appropriate calculation to account for Margin Credits in the FAC.

Minnesota Rule 7829.3200 allows the Commission to vary its Rules provided that a three-part test is satisfied: (1) enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule; (2) granting the variance would not adversely affect the public interest; and (3) granting the variance would not conflict with standards imposed by law.

First, enforcement of the rule would impose an excessive burden upon the applicant and others. As discussed above, Minnesota Power seeks approval of this Petition to address a key driver of its current retail rate case. With approval of this Petition, Minnesota Power will move to withdraw this 2019 Rate Case, thereby relieving parties to that proceeding of the administrative burden of continuing to litigate that case. Second, granting this variance would not adversely affect the public interest. On the contrary – the public interest is served by allowing timely and accurate recovery of Margin Credits for the benefit of Minnesota Power customers. And because including the Margin Credits in the FAC would result in customers and Minnesota Power receiving

no more or less than the actual value of Margin Credits, there is no adverse effect on any stakeholder. Third and finally, this variance would not conflict with standards imposed by law. No law precludes Minnesota Power's proposal, and as noted above, such treatment has in fact already been granted to two other utilities in this state. As these three conditions for granting a variance have been met, the Commission should approve any variance necessary to effectuate the Company's proposal, to the extent the Commission determines such a rule variance is needed.

3. Suspension and Withdrawal of Minnesota Power's General Rate Case

While the Commission considers this Petition, the Company has filed a motion with the ALJ to suspend the procedural schedule of its 2019 Rate Case. Further, if the Commission ultimately grants the Company's Petition to include Margin Credits in the FAC, the Company will withdraw this rate case. Withdrawal of the current rate case will ease the administrative burdens associated with litigating this case and allow Minnesota Power and other stakeholders to focus on more pressing needs during this time of crisis and as all stakeholders grapple with an uncertain future. For Minnesota Power, this means focusing on the core tasks of providing safe and reliable electric service to our customers while protecting our employees and members of the public. Withdrawal of the rate case also creates certainty and reduces the potential for a higher final rate increase than the net effect the Company is requesting in this Petition, as Minnesota Power's costs are substantially higher than are reflected in its current base rates.

However, in the event the Commission declines to approve this Petition, Minnesota Power must continue with the litigation of its current rate case. The Company acknowledges that consideration of the Petition, and ultimately restarting the rate case following suspension in the event the Petition is denied, will require extension of existing deadlines set forth in the Fifth Prehearing Order. The Company therefore agrees to waive the statutory deadline for the Commission's final decision on the 2019 Rate Case for a period of 60 days.

4. Reduce and Provide Customer Refunds of Interim Rates

Effective May 1, 2020, Minnesota Power proposes that the Commission reduce its interim rate increase of 5.8 percent to 4.1 percent, which is equal to the projected long-term net impact to rates of moving Margin Credits to the FAC. This change would have the immediate effect of reducing rates customers are actually currently paying by 1.7 percent.

If this Petition is ultimately approved, Minnesota Power proposes to refund all interim rates collected through the implementation date, with interest on the refunded amount at the prime rate, as consistent with the approach approved by the Commission for Minnesota Power's prior rate cases. Upon Commission approval, the Company will prepare a subsequent compliance filing comparing the amounts collected through interim rates prior to implementation of this proposal to the amount that would need to be collected to implement the proposed changes to base rates plus the FAC as of May 1, 2020. The net difference between these amounts is currently estimated to result in a refund to customers of approximately \$12 million.²⁹ The Company's approach to calculating this net difference is shown below:

$$\begin{aligned} & \text{(Interim Rates Collected Jan 1, 2020 thru Commission Approval)} \\ & \quad - \text{(Financial Result of FAC Change Effective May 1, 2020)} \\ & \quad = \text{net interim rate refund of approximately \$12 million} \end{aligned}$$

5. Stay Out Provision

In the event the Commission approves this Petition, Minnesota Power will agree to not file another general rate case before November 1, 2021, absent an EITE customer shutting down or idling at least 50 MW of load below their actual load as of April 20, 2020, for a period of at least three months. While the Company does not intend to file a case prior to November 1, 2021, this exception is necessary in the event Minnesota Power has no choice but to seek rate relief due to extenuating circumstances beyond its control. If this load reduction occurs earlier than November 1, 2021, the Company will provide at least 90 days written notice to the Commission before filing a rate case. However, in no event will the Company file a rate case before March 1, 2021.

6. Address Key Residential Rate Design Issues in Other Dockets

While withdrawal of the 2019 Rate Case will reduce the administrative burdens associated with litigating this case, Minnesota Power recognizes that there are revenue neutral, residential rate design matters that parties may wish to address before a future general rate case, including time-of-use rates and inclining block rate structures. Therefore, Minnesota Power will work with

²⁹ Since interim rates effective May 1, 2020 are intended to approximate the effect of moving Margin Credits from base rates to the FAC effective May 1st, the "net difference" (the refund amount) effectively represents the estimated interim rates collected for the period between January 1, 2020 and April 30, 2020.

stakeholders in the time-of-day docket to identify other revenue neutral, residential rate design options and proposes to address these outstanding residential rate design issues in the Company's time-of-day docket (Docket No. E015/M-12-233).

The Company also proposes to maintain the EITE rate to February 1, 2021. This is the original expiration date of the EITE rate and is consistent with the Commission's March 17, 2020 Order in the EITE docket.³⁰ However, the Company recognizes the ongoing concerns of its largest customers and the State's policy considerations around an EITE rate. This Petition is not intended to change any party's opportunity to propose in other dockets to extend or modify the EITE rate beyond February 1, 2021.

7. Tariff Modifications

Transferring inclusion of Margin Credits from base rates to the FAC will also require minor modifications to Minnesota Power's tariff. Redlined and clean versions of the affected pages of Minnesota Power's Electric Rate Book will be provided as a compliance filing upon approval of the Petition. The Company understands that the Commission may seek other compliance filings upon approval, and is committed to work with Commission Staff and the parties to provide such filings as may be helpful and appropriate.

CONCLUSION

Minnesota Power respectfully requests that the Commission approve this Petition and allow the Company to include Margin Credits in the Company's FAC. The Commission's approval of this Petition will allow Minnesota Power to resolve its 2019 general rate case, provide rate relief to our retail customers in terms of both an immediate reduction in rates and ultimately a refund of all interim rates, as well as reductions in the Company's overall cost recovery requests at this difficult time.

While Minnesota Power has an obligation to assure the health of the business in order to continue providing essential services to our customers, our primary focus remains the health and well-being of our employees and the communities we serve, and of the individuals with the

³⁰ *In the Matter of Minnesota Power's Revised Petition for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider*, Docket No. E015/M-16-564, ORDER APPROVING RIDER EXTENSION WITH CONDITIONS (Mar. 17, 2020).

responsibility to address this Petition. The Company appreciates attention to this important matter, and hopes the Commission finds this to be a thoughtful, constructive, robust, and fair resolution for all stakeholders.

April 23, 2020

Respectfully submitted,

MINNESOTA POWER



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ATTORNEYS FOR MINNESOTA POWER

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Emergency Petition of
Minnesota Power for Approval to Recover
Asset-Based Wholesale Margins in Fuel
Adjustment Clause and Resolve Rate Case

Docket No. E015/M-20-429

PETITION

SUMMARY OF FILING

Please take notice that on April 23, 2020, Minnesota Power filed with the Minnesota Public Utilities Commission an Emergency Petition for Approval to Recover Asset-Based Wholesale Margins in the Fuel Adjustment Clause and Resolve Rate Case effective May 1, 2020.

Flow Margin Credits through the FAC

<i>(in millions)</i>	December 31, 2019 Rates	Approved Interim Rates	Proposed Final Rates	Proposal Jan-Apr 2020	Proposal eff. May 1, 2020
Assumptions					
Base Rates	Base	Base + 5.8%	Base + 10.59%	Base	Base
Margin Credit Location	Base Rates	Base Rates	Base Rates	Base Rates	FAC*
Base Rates – Rev. Reqs.				<i>annualized</i>	<i>annualized</i>
Margin Credit in Base Rates	(35.8)	(20.2)	(10.0)	(35.8)	-
<u>Other Revenue Requirement</u>	<u>658.9</u>	<u>679.4</u>	<u>699.1</u>	<u>658.9</u>	<u>658.9</u>
Total Base Rate Rev. Req.	623.1	659.2	689.1	623.1	658.9
FAC Impact					<i>estimate</i>
Margin Credit in FAC	-	-	-	-	(10.0)
Results of Proposal					
Total Rev. Req. (Base + FAC)	623.1	659.2	689.1	623.1	648.9
Residential Bill Impact of Base + FAC Changes**		\$4.48/month	\$11.66/month	\$0/month	\$3.53/month
Percent Change vs. 12/31/19 Rev. Req.		5.8%	10.6%	0.0%	4.1%
<i>Total 2020 Test Year % Change***</i>				2.8%	

*Proposal includes flowing actual Margin Credits through the FAC; number shown is budget to illustrate proposal.

**Assumes all interim rates refunded and Margin Credits in FAC 5/1/20. Actual split between interim rates/FAC may differ.

***Weighted average, reflecting Jan. to April Margin Credits in base rates and May to Dec. Margin Credits in FAC.

Residential (average current rate, \$/kWh)	\$	0.10872
Increase (\$/kWh)	\$	0.00503
Increase (%)		4.63%
Average Impact (\$/month)	\$	3.53
<hr/>		
General Service (average current rate, \$/kWh)	\$	0.10696
Increase (\$/kWh)	\$	0.00490
Increase (%)		4.59%
Average Impact (\$/month)	\$	13.28
<hr/>		
Large Light & Power (average current rate, \$/kWh)	\$	0.08100
Increase (\$/kWh)	\$	0.00344
Increase (%)		4.25%
Average Impact (\$/month)	\$	852.12
<hr/>		
Large Power (average current rate, \$/kWh)	\$	0.06167
Increase (\$/kWh)	\$	0.00235
Increase (%)		3.82%
Average Impact (\$/month)	\$	129,700.40
<hr/>		
Lighting (average current rate, \$/kWh)	\$	0.17199
Increase (\$/kWh)	\$	0.00892
Increase (%)		5.19%
Average Impact (\$/month)	\$	3.01
<hr/>		
Residential Dual Fuel (average current rate, \$/kWh)	\$	0.08403
Increase (\$/kWh)	\$	0.00372
Increase (%)		4.43%
Average Impact (\$/month)	\$	3.96
<hr/>		
Commercial Dual Fuel (average current rate, \$/kWh)	\$	0.08001
Increase (\$/kWh)	\$	0.00340
Increase (%)		4.24%
Average Impact (\$/month)	\$	14.45

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

MPUC DOCKET No.: E015/M-20-429

CERTIFICATE OF SERVICE

Jill N. Yeaman certifies that on the 23rd day of April, 2020, on behalf of Minnesota Power, she efiled a true and correct copy of **MINNESOTA POWER'S EMERGENCY PETITION FOR APPROVAL TO MOVE ASSET-BASED WHOLESALE SALES CREDITS TO THE FUEL ADJUSTMENT CLAUSE AND RESOLVE RATE CASE** via eDockets (www.edockets.state.mn.us). Said document was served via electronic filing through the eDockets system on all persons on the service list in Docket No. E015/GR-19-442, including the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities Division.

A copy of the **SUMMARY OF FILING** has been served on all persons on the (1) service list in Docket No. E015/AA-19-302 via electronic filing through the eDocket system and (2) Minnesota Power's General Service List via electronic mail, both lists attached hereto.

/s/ Jill N. Yeaman

Jill N. Yeaman

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

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

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

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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_Official CC Service List
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	Turnboom	karen.turnboom@versoco.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_Official CC Service List
Kodi	Verhalen	kverhalen@taftlaw.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	scott.zahorik@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@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_19-302_AA-19-302
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sundra	Bender	sundra.bender@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 Saint Paul, MN 55101-2147	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jon	Brekke	jbrekke@greenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_19-302_AA-19-302
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-302_AA-19-302
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-302_AA-19-302
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Paper Service	No	OFF_SL_19-302_AA-19-302
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-302_AA-19-302
Marie	Doyle	marie.doyle@centerpointenergy.com	CenterPoint Energy	505 Nicollet Mall P O Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_19-302_AA-19-302
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-302_AA-19-302
John R.	Gasele	ygasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-302_AA-19-302
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-302_AA-19-302
Todd J.	Guerrero	todd.guerrero@kutakrock.com	Kutak Rock LLP	Suite 1750 220 South Sixth Street Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-302_AA-19-302
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Robert	Harding	robert.harding@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-302_AA-19-302
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Corey	Hintz	chintz@dakotaelectric.com	Dakota Electric Association	4300 220th Street Farmington, MN 550249583	Electronic Service	No	OFF_SL_19-302_AA-19-302
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-302_AA-19-302
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Ganesh	Krishnan	ganesh.krishnan@state.mn.us	Public Utilities Commission	Suite 350121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-302_AA-19-302
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-302_AA-19-302
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Amy	Liberkowsky	amy.a.liberkowsky@xcelenergy.com	Xcel Energy	414 Nicollet Mall 7th Floor Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-302_AA-19-302
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-302_AA-19-302
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302

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_19-302_AA-19-302
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_19-302_AA-19-302
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-302_AA-19-302
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-302_AA-19-302
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kate	O'Connell	kate.oconnell@state.mn.us	Department of Commerce	Suite 50085 Seventh Place East St. Paul, MN 551012198	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Kevin	O'Grady	kevin.ograde@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-302_AA-19-302
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-302_AA-19-302
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_19-302_AA-19-302
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Catherine	Phillips	catherine.phillips@we-energies.com	We Energies	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-302_AA-19-302
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
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_19-302_AA-19-302
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-302_AA-19-302
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_19-302_AA-19-302
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-302_AA-19-302
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-302_AA-19-302
Ann	Schweiger	ann.schwieger@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-302_AA-19-302
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_19-302_AA-19-302
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-302_AA-19-302
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kristin	Stastny	kstastny@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-302_AA-19-302
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-302_AA-19-302
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-302_AA-19-302
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-302_AA-19-302
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_19-302_AA-19-302
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-302_AA-19-302
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-302_AA-19-302
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-302_AA-19-302
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_19-302_AA-19-302
Mary	Wolter	mary.wolter@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)	231 West Michigan St Milwaukee, WI 53203	Electronic Service	No	OFF_SL_19-302_AA-19-302
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-302_AA-19-302

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	Yes	GEN_SL_Minnesota Power_MPs General Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	GEN_SL_Minnesota Power_MPs General Service List
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	Yes	GEN_SL_Minnesota Power_MPs General Service List
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Michael	Krikava	mkrikava@taftlaw.com	TAFT Stettinius & Hollister, LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	GEN_SL_Minnesota Power_MPs General Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
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	GEN_SL_Minnesota Power_MPs General Service List
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	GEN_SL_Minnesota Power_MPs General Service List