



AN ALLETE COMPANY

April 14, 2026

VIA E-FILING

Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of the Petition for Approval of
Modifications to Large Power Tariff
Docket No. E015/M-26-126
COMPLIANCE FILING - Proposed Tariff Modifications

Dear Ms. Bergman:

Minnesota Power (or, the “Company”) submits to the Minnesota Public Utilities Commission (“Commission”) the attached proposed tariff modifications, including the Large Power (“LP”) Service tariff and the Rider for Conservation Program Adjustment for evaluation and approval. The tariff modifications proposal was originally submitted on March 27, 2026 in Docket No. E015/M-26-159, *In the Matter of the Petition for Approval of an Electric Service Agreement between Google and Minnesota Power*. However, the Company is cross-filing the tariff modifications proposal in this docket for public transparency purposes and to aid in the Commission’s determination of the appropriate proceeding to consider the proposed tariff modifications.

Large Power Service Tariff Modification

The Company proposes revisions to the Large Power Service tariff to modernize the existing Large Power Surcharge (“LP Surcharge”) language, while maintaining the important protection for Minnesota Power’s existing system customers as new customer load serving costs are added to the system. The proposed changes to the Large Power Service tariff are shown in clean and redlined versions of the tariff provided in Attachment A.¹

The updated tariff language includes a margin contribution analysis, as shown for the initial and annual calculations in Attachment B.² The margin contribution analysis is proposed to be performed for customers with Firm Demand load growth in excess of

¹ The proposed modifications to the Large Power Service tariff were included as Attachment D in Docket No. E015/M-26-159.

² The Margin Contribution Analysis Calculation for the Large Power Surcharge was included as Attachment E in Docket No. E015/M-26-159.

50,000 kW. The initial calculation will be completed for evaluation approximately six months prior to reaching load growth of 50,000 kW and will be calculated with an outlook period of five years. For example, if a large power customer comes online January 1, 2028, the marginal contribution analysis will evaluate a period from 2028 through the end of 2032. After the initial margin contribution analysis, the Company will perform the margin contribution analysis on an annual basis until no surcharge is demonstrated for a rolling consecutive five-year period. This proposed timing for the analysis aligns with the need to ensure there are additional details available for the actual customer load ramp, revenue, and the type, timing, and cost of new generation resources needed to serve the customer. Additionally, while the Company understands a true-up mechanism may be needed for recovery and/or reimbursement of the LP Surcharge, Minnesota Power is open to working with stakeholders to determine the appropriate timing and details of such a true-up mechanism.

Based on the margin contribution analysis, if the net present value of revenues from the customer are in excess of costs to serve, this confirms that system customers will receive positive benefits from having this new load on the system. In other words, this would indicate that the customer is demonstrating that they will pay for all costs attributable to them and would provide additional revenues to contribute to the recovery of system fixed costs attributed to serving existing system customers energy needs – resulting in benefits for existing system customers. If the net present value of the margin contribution analysis shows projected revenues to be lower than costs, then the necessary LP Surcharge will be applied to the customer’s bill. The LP Surcharge is applied to bring additional revenue such that costs are paid for and to ensure no harm to other customers. The margin contribution analysis appropriately captures both marginal costs and revenues to understand the impact to existing system customers.

For LP customers with Firm Demand load growth in excess of 50,000 kW the initial margin contribution analysis revenue will include estimated base rate revenue (including interim revenue if applicable) and rider revenue.³ Margin contribution analysis will also include costs to serve the new large power customer, and will include estimated energy- and capacity-related costs.⁴ The capacity costs for a customer with an Electric Service Agreement (“ESA”) will be determined based on the need for the mix of generation, energy storage resource additions, and capacity purchases, and , as applicable, will be available after resource selection is completed and approved by the Commission. The net of the increase in revenue and the aforementioned costs is the result of the margin contribution analysis.

³ Current riders include Rider for Fuel and Purchased Energy Charge, Rider for Capacity Revenue and Expense Adjustment, Rider for Large Power Incremental Production Service, Rider for Renewable Resources, Rider for Transmission Cost Recovery, Rider for Customer Affordability of Residential Electricity, Rider for Business Expansion Incentive, Rider for Large Power Demand Response Service, and Rider for Renewable Resources – Solar Factor Adjustment.

Rider for Conservation Program Adjustment Modification

Consistent with recent Minnesota legislation amending Minn. Stat § 216B.241, Subd. 1a, the Company proposes revisions to the Rider for Conservation Adjustment to address data center participation in conservation improvement programs.

The recent Minnesota legislation exempts qualified large-scale data centers from contributing to a utility's energy conservation plan by paying a fee to a state program which uses those funds to support energy conservation and weatherization for low-income customers anywhere in Minnesota per Minn. Stat. § 216B.241, Subd. 2a(c), as amended. The fee is based on the qualified facility's peak demand. The resulting proposed changes to the Rider for Conservation Program Adjustment are shown in clean and redlined versions of the tariff provided in Attachment C.⁵

Minnesota Power appreciates the Commission's consideration of the proposed tariff modifications and looks forward to working with interested parties in this proceeding.

Please contact me at (218) 355-3297 or jkuklenski@mnpower.com with any questions regarding this filing.

Respectfully,



Jennifer Kuklenski
Manager – Regulatory Strategy and Policy
Minnesota Power
30 W Superior Street
Duluth, MN 55802

JK:th
cc: Service List
Attach.

⁵ The proposed modifications to the Rider for Conservation Program Adjustment were included as Attachment F in Docket No. E015/M-26-159.

LARGE POWER SERVICE

RATE CODES

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APPLICATION

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

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

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

ELECTRIC SERVICE AGREEMENTS

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

At a minimum, every ESA shall include the following:

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

Filing Date: December 16, 2025 & March X, 2026 **MPUC Docket No.:** ~~E015/PA-24-198~~ & ~~E015/PA-26-XX~~

Effective Date: January 1, 2026 **Order Date:** December 10, 2025

Approved by: Leah N. Peterson
Leah N. Peterson
Director – Customer Analytics and Market Settlements

LARGE POWER SERVICE

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

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

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

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

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

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

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

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

TYPE OF SERVICE

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LARGE POWER SERVICE

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

BASE RATES (MONTHLY)

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

Demand Charge

A single application for the first 10,000 kW or less of Firm Demand \$244,334

All additional kW of Firm Demand (\$/kW) \$24.00

Transmission Demand Charge

All kW of Firm Demand (\$/kW) \$8.49

Energy Charge

All Firm Energy kWh (¢/kWh) (All On-Peak and Off-Peak) 1.164¢

Excess Energy Charge

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

ADJUSTMENTS

Company may modify Base Rates by the following adjustments:

1. Service Voltage Adjustment. Unless otherwise agreed in the ESA, where service delivery voltage is at Company's available high voltage of 13,000 through 69,000 volts, Company will increase the Demand Charge by \$1.75 per kW of Firm Demand for that portion of Firm Demand taken at 13,000 through 69,000 volts.
2. Fuel and Purchased Energy Adjustment. A fuel and purchased energy adjustment will be determined in accordance with the Rider for Fuel and Purchased Energy Charge.
3. Capacity Revenue and Expense Adjustment. A capacity revenue and expense adjustment will be determined in accordance with the Rider for Capacity Revenue and Expense Adjustment.

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4. Conservation Adjustment. Adjustment will be determined in accordance with the Rider for Conservation Program Adjustment.
5. Transmission Adjustment. A transmission investment adjustment will be determined in accordance with the Rider for Transmission Cost Recovery.
6. Renewable Resource Adjustment. A renewable resources adjustment will be determined in accordance with the Rider for Renewable Resources.
7. CARE Low-Income Affordability Program Surcharge. There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Rider for Customer Affordability of Residential Electricity (CARE).
8. Solar Energy Adjustment. There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.
9. Minnesota Policy Adjustment. The combination of Conservation, Transmission, Renewable Resource, and Solar Energy Adjustments may be shown on Customer's bills as the Minnesota Policy Adjustment.
10. Taxes and Assessments. An adjustment for the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.
11. Franchise Fee. An adjustment for customers located within the corporate limits of the applicable city as specified in the applicable Rider for the city's Franchise Fee.

MEASURED AND ADJUSTED DEMAND

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

The adjusted demand ("Adjusted Demand") in the month shall be the Measured Demand increased by one kilowatt for each 20 kvar of excess reactive demand. Excess reactive

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demand means the amount by which the maximum 15-minute measured kvar during the month exceeds 50% of the first 20,000 kW of Measured Demand plus 25% of all additional kW of Measured Demand.

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

DEMAND

1. Firm Demand. The Customer's ESA specifies the amount of Firm Demand in any billing month. In general, the Firm Demand will be based on amount specified, selected, nominated, determined or agreed upon in the Customer's ESA. Regardless of how the ESA describes or calculates the Customer's contractual demand in any billing month for purposes of applying the Demand Charge, this amount shall be deemed to be the Customer's Firm Demand for purposes of this LP Schedule and the application of the Demand Charge.
2. Demands in Excess of Firm Demand. Company will endeavor to serve Customer requirements for power in excess of Firm Demand, but Company has no responsibility or liability whatsoever for failing to provide any power in excess of Firm Demand.

DEMAND NOMINATIONS

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

ENERGY

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

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Large Power Incremental Production Service or another Rider applicable to Large Power Service and available to the Customer pursuant to its ESA.

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

PAYMENT

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

LARGE POWER SURCHARGE

~~For new Customers with Firm Demand load growth in excess of 50,000 kW in any twenty-four month period, or for existing customers with increases in Firm Demand of more than 50,000 kW in any twenty-four month period, the additional Firm Demand in excess of 50,000 kW will could be subject to a Large Power Surcharge. The Company will assess the Large Power Surcharge tied to the load addition by calculating a margin contribution analysis approximately six months prior to reaching load growth of 50,000 kW. The analysis will compare estimated margin contribution analysis costs to estimated margin contribution analysis revenue for an outlook period of five years. If the attributable costs are greater than the revenue over the term of the initial ESA, then a Large Power Surcharge shall be applied to the customer bill. After the initial margin contribution analysis, the Company will perform the margin contribution analysis on an annual basis until no surcharge is calculated for a rolling five-year period. There may also be an annual margin contribution analysis true-up calculated and assessed, as applicable, for a period of five years from the date the Customer executes a binding Commitment Agreement to take the power. The Large Power Surcharge~~

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~~will cover the additional cost to Company of obtaining the necessary power supply. The Large Power Surcharge shall be the sum of a Capacity Portion and Energy Portion as described below. If the sum is negative then the Large Power Surcharge shall be zero.~~

~~For each kW of Firm Demand subject to surcharge Company shall add to the Demand Charge the excess of Company's Large Power Surcharge Supply Capacity Costs per kW over Company's Basic Capacity Cost. 1) Company's cost per kW as purchased from its power suppliers with appropriate adjustments for reserve requirements/replacement power, transmission losses and coincidence factor; 2) The Company's estimated annual Revenue Requirements per kW associated with Company's power production facilities added or refurbished to supply the power; or 3) A blend of the above costs if more than one source is used to supply the power. Company's Basic Capacity Costs per kW will be Company's estimated annual Revenue Requirements associated with Company-owned power production facilities and with Company firm power purchases, exclusive of the estimated annual Revenue Requirements associated with any such purchases or Company-owned power facilities which are covered by a Large Power Surcharge, divided by the aggregate coincidental kilowatts of all customer loads serviced by such generating capacity and purchased capacity, adjusted for estimated transmission losses and load coincidence factor. Company will advise Customer of the Large Power Surcharge Supply Capacity Costs as soon the Company has made arrangements for the capacity and Company will advise Customer of the Company's Basic Capacity Costs 30 days prior to the beginning of each calendar year in which the surcharge may be applied.~~

Energy Portion

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

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

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

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

OPERATING PRACTICES

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

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RATE CODES

74

APPLICATION

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

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

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

ELECTRIC SERVICE AGREEMENTS

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

At a minimum, every ESA shall include the following:

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

Unless otherwise specifically approved by the Commission, each ESA shall have an initial minimum term of ten (10) years and shall continue in force until either party gives the other

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party written notice of cancellation at least four years prior to the time such cancellation shall be effective.

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

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

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

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

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

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

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

TYPE OF SERVICE

Unless otherwise agreed in an ESA, Large Power Service shall be three phase, 60 hertz, at Company's available transmission voltage of at least 115,000 volts. Customer may specifically request to take all or any portion of its Large Power Service at Company's

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available high voltage of 13,000 through 69,000 volts, and such lower voltage deliveries may be subject to a Service Voltage Adjustment as described below.

BASE RATES (MONTHLY)

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

Demand Charge

A single application for the first 10,000 kW or less of Firm Demand \$244,334

All additional kW of Firm Demand (\$/kW) \$24.00

Transmission Demand Charge

All kW of Firm Demand (\$/kW) \$8.49

Energy Charge

All Firm Energy kWh (¢/kWh) (All On-Peak and Off-Peak) 1.164¢

Excess Energy Charge

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

ADJUSTMENTS

Company may modify Base Rates by the following adjustments:

1. Service Voltage Adjustment. Unless otherwise agreed in the ESA, where service delivery voltage is at Company's available high voltage of 13,000 through 69,000 volts, Company will increase the Demand Charge by \$1.75 per kW of Firm Demand for that portion of Firm Demand taken at 13,000 through 69,000 volts.
2. Fuel and Purchased Energy Adjustment. A fuel and purchased energy adjustment will be determined in accordance with the Rider for Fuel and Purchased Energy Charge.
3. Capacity Revenue and Expense Adjustment. A capacity revenue and expense adjustment will be determined in accordance with the Rider for Capacity Revenue and Expense Adjustment.
4. Conservation Adjustment. Adjustment will be determined in accordance with the Rider for Conservation Program Adjustment.

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5. Transmission Adjustment. A transmission investment adjustment will be determined in accordance with the Rider for Transmission Cost Recovery.
6. Renewable Resource Adjustment. A renewable resources adjustment will be determined in accordance with the Rider for Renewable Resources.
7. CARE Low-Income Affordability Program Surcharge. There shall be added to the monthly bill, as computed above, a Low-Income Affordability Program Surcharge determined in accordance with the Rider for Customer Affordability of Residential Electricity (CARE).
8. Solar Energy Adjustment. There shall be added to or deducted from the monthly billing, as computed above, a solar energy adjustment determined in accordance with the Rider for Solar Energy Adjustment.
9. Minnesota Policy Adjustment. The combination of Conservation, Transmission, Renewable Resource, and Solar Energy Adjustments may be shown on Customer's bills as the Minnesota Policy Adjustment.
10. Taxes and Assessments. An adjustment for the applicable proportionate part of any taxes and assessments imposed by any governmental authority which are assessed on the basis of meters or customers, or the price of or revenues from electric energy or service sold, or the volume of energy generated, transmitted or purchased for sale or sold.
11. Franchise Fee. An adjustment for customers located within the corporate limits of the applicable city as specified in the applicable Rider for the city's Franchise Fee.

MEASURED AND ADJUSTED DEMAND

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

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

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

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LARGE POWER SERVICE**DEMAND**

1. Firm Demand. The Customer's ESA specifies the amount of Firm Demand in any billing month. In general, the Firm Demand will be based on amount specified, selected, nominated, determined or agreed upon in the Customer's ESA. Regardless of how the ESA describes or calculates the Customer's contractual demand in any billing month for purposes of applying the Demand Charge, this amount shall be deemed to be the Customer's Firm Demand for purposes of this LP Schedule and the application of the Demand Charge.
2. Demands in Excess of Firm Demand. Company will endeavor to serve Customer requirements for power in excess of Firm Demand, but Company has no responsibility or liability whatsoever for failing to provide any power in excess of Firm Demand.

DEMAND NOMINATIONS

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

ENERGY

1. Firm Energy. Firm Energy shall mean the total electric consumption of the Customer measured in kilowatt-hours ("kWh") in each hour of the billing month, regardless of whether it is taken during peak or off peak hours, but limited to no more than the Customer's Firm Demand in any hour. In general, the amount of Firm Energy billed in each hour of the billing month will be equal to the amount of Firm Demand in that month unless modified by terms in the Customer's ESA.
2. Excess Energy. Excess Energy shall be the kWh of energy taken by Customer in each hour of the month in excess of the allowable Firm Energy levels specified in the Customer's ESA in that hour, unless the Customer takes such energy under the Rider for Large Power Incremental Production Service or another Rider applicable to Large Power Service and available to the Customer pursuant to its ESA.
3. Excess Energy shall be billed at 110% of the Company's Incremental Energy Cost in month. Company's Incremental Energy Cost shall be determined each hour of the month and shall include fuel costs and variable operation and maintenance expenses for generating or purchasing the excess energy. Company's Incremental Energy Cost will be the highest cost energy after assigning lower cost energy to: all firm retail and wholesale

Filing Date: December 16, 2025 & March X, 2026 **MPUC Docket No.:** E015/PA-24-198 & E015/PA-26-XX

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Leah N. Peterson
Director – Customer Analytics and Market Settlements

LARGE POWER SERVICE

customer requirements; all intersystem (pool) sales that involve capacity on a firm or participation basis; and all interruptible sales to Large Power, Large Light and Power, and General Service customers; but not including sales for Incremental Production Service.

PAYMENT

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

LARGE POWER SURCHARGE

Customers with Firm Demand load growth in excess of 50,000 kW could be subject to a Large Power Surcharge. The Company will assess the Large Power Surcharge tied to the load addition by calculating a margin contribution analysis approximately six months prior to reaching load growth of 50,000 kW. The analysis will compare estimated margin contribution analysis costs to estimated margin contribution analysis revenue for an outlook period of five years. If the attributable costs are greater than the revenue over the term of the initial ESA, then a Large Power Surcharge shall be applied to the customer bill. After the initial margin contribution analysis, the Company will perform the margin contribution analysis on an annual basis until no surcharge is calculated for a rolling five-year period. There may also be an annual margin contribution analysis true-up calculated and assessed, as applicable.

OPERATING PRACTICES

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

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Director – Customer Analytics and Market Settlements

Large Power Surcharge - Margin Contribution Analysis Calculation

Initially Filed Approximately Six Months Prior to Customer Reaching 50,000 kW

	Energy Cost Analysis (Determine Energy Cost Attributable to Serve Large Power Customer)			Capacity Cost Analysis (Determine Capacity Cost Attributable to Serve Large Power Customer)			Generation Asset Cost Analysis (Determine Revenue Requirements of Generation Attributable to Large Power Customer)	Transmission/Distribution Cost Analysis Attributable to Large Power Customer	Margin Contribution Analysis		
	[1]	[2]	[3] = [1] x [2]	[4]	[5]	[6] = [4] x [5]	[7]	[8]	[9] = [8] + [7] + [6] + [3]	[10]	[11] = [10] - [9]
Years 1-5 of ESA Term	Customer's kWh Usage	Energy Cost Attributable to Customer (\$ per kWh)	Total Marginal Energy Cost	Peak Billing Demand (kW)	Capacity Cost Attributable to Customer per kW	Total Marginal Capacity Cost	Generation Revenue Requirements Attributable to Customer (If Applicable)	Transmission/Distribution Revenue Requirements Attributable to Customer (If Applicable)	Total Attributable Costs	Electric Revenue	Electric Revenue in Excess of Attributable Costs
Forward Year 1	Customer's estimated kWh usage based on capacity and load factor	Based on procurement of energy, expected market energy prices, fuel prices, or another method determined as most appropriate	Calculation	Customer estimated peak kW	Based on procurement of capacity (MP short), opportunity cost (MP long), or another method determined as most appropriate	Calculation	Actual or estimated generation revenue requirement costs calculated by Minnesota Power (excludes fuel and charging costs)	Extension costs estimated by engineering. Revenue Requirement calculated by finance (to determine annual amount)	Calculation	Calculated based on the customer's service schedule, current rates and riders approved by MPUC or estimated rates, and energy/demand estimates provided by customer	Calculation
Forward Year 2											
Forward Year 3											
Forward Year 4											
Forward Year 5											
Total - Net Present Value	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Calculation (+) = No Surcharge Applicable (-) = Surcharge Applicable

Filed Annually After Initial Margin Contribution Analysis is Approved

	Energy Cost Analysis (Determine Energy Cost Attributable to Serve Large Power Customer)			Capacity Cost Analysis (Determine Capacity Cost Attributable to Serve Large Power Customer)			Generation Asset Cost Analysis (Determine Revenue Requirements of Generation Attributable to Large Power Customer)	Transmission/Distribution Cost Analysis Attributable to Large Power Customer	Margin Contribution Analysis		
	[1]	[2]	[3] = [1] x [2]	[4]	[5]	[6] = [4] x [5]	[7]	[8]	[9] = [8] + [7] + [6] + [3]	[10]	[11] = [10] - [9]
Years 2-6 of ESA Term	Customer's kWh Usage	Energy Cost Attributable to Customer (\$ per kWh)	Total Marginal Energy Cost	Peak Billing Demand (kW)	Capacity Cost Attributable to Customer per kW	Total Marginal Capacity Cost	Generation Revenue Requirements Attributable to Customer (If Applicable)	Transmission/Distribution Revenue Requirements Attributable to Customer (If Applicable)	Total Attributable Costs	Electric Revenue	Electric Revenue in Excess of Attributable Costs
Forward Year 2	Customer's estimated kWh usage based on capacity and load factor	Based on procurement of energy, expected market energy prices, fuel prices, or another method determined as most appropriate	Calculation	Customer estimated peak kW	Based on procurement of capacity (MP short), opportunity cost (MP long), or another method determined as most appropriate	Calculation	Actual or estimated generation revenue requirement costs calculated by Minnesota Power (excludes fuel and charging costs)	Extension costs estimated by engineering. Revenue Requirement calculated by finance (to determine annual amount)	Calculation	Calculated based on the customer's service schedule, current rates and riders approved by MPUC or estimated rates, and energy/demand estimates provided by customer	Calculation
Forward Year 3											
Forward Year 4											
Forward Year 5											
Forward Year 6											
Total - Net Present Value	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Calculation (+) = No Surcharge Applicable (-) = Surcharge Applicable

Filed Annually After Initial Margin Contribution Analysis is Approved

	Energy Cost Analysis (Determine Energy Cost Attributable to Serve Large Power Customer)			Capacity Cost Analysis (Determine Capacity Cost Attributable to Serve Large Power Customer)			Generation Asset Cost Analysis (Determine Revenue Requirements of Generation Attributable to Large Power Customer)	Transmission/Distribution Cost Analysis Attributable to Large Power Customer	Margin Contribution Analysis		
	[1]	[2]	[3] = [1] x [2]	[4]	[5]	[6] = [4] x [5]	[7]	[8]	[9] = [8] + [7] + [6] + [3]	[10]	[11] = [10] - [9]
Years 3-7 of ESA Term	Customer's kWh Usage	Energy Cost Attributable to Customer (\$ per kWh)	Total Marginal Energy Cost	Peak Billing Demand (kW)	Capacity Cost Attributable to Customer per kW	Total Marginal Capacity Cost	Generation Revenue Requirements Attributable to Customer (If Applicable)	Transmission/Distribution Revenue Requirements Attributable to Customer (If Applicable)	Total Attributable Costs	Electric Revenue	Electric Revenue in Excess of Attributable Costs
Forward Year 3	Customer's estimated kWh usage based on capacity and load factor	Based on procurement of energy, expected market energy prices, fuel prices, or another method determined as most appropriate	Calculation	Customer estimated peak kW	Based on procurement of capacity (MP short), opportunity cost (MP long), or another method determined as most appropriate	Calculation	Actual or estimated generation revenue requirement costs calculated by Minnesota Power (excludes fuel and charging costs)	Extension costs estimated by engineering. Revenue Requirement calculated by finance (to determine annual amount)	Calculation	Calculated based on the customer's service schedule, current rates and riders approved by MPUC or estimated rates, and energy/demand estimates provided by customer	Calculation
Forward Year 4											
Forward Year 5											
Forward Year 6											
Forward Year 7											
Total - Net Present Value	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Five Year Outlook Period	Calculation	Five Year Outlook Period	Calculation (+) = No Surcharge Applicable (-) = Surcharge Applicable

RIDER FOR CONSERVATION PROGRAM ADJUSTMENT

APPLICATION

Applicable to bills for electric service under all Retail Rate Schedules except for Company's Competitive Rate Schedules 73 and 79. This Rider shall not be applicable to Economy or Standby service to retail customers.

Except as provided below in the CUSTOMER EXEMPTIONS AND RATE ADJUSTMENTS section, there shall be added to each non-ECO exempt customer's monthly bill a Conservation Program Adjustment (CPA) charge which shall be the applicable CPA factor multiplied by the customer's monthly kWh of energy usage. The applicable CPA factor per kWh shall be determined annually as described below.

DETERMINATION OF THE CONSERVATION PROGRAM ADJUSTMENT FACTOR

The Conservation Program Adjustment factor shall be the quotient of the Recoverable Tracker balance, divided by projected retail energy sales (exclusive of those energy sales from customers who have been granted an exemption from ECO costs (see CUSTOMER EXEMPTIONS AND RATE ADJUSTMENTS section). The CPA factor will remain in effect until subsequent MPUC approval of an updated factor. The Recoverable Tracker balance shall be determined by adjusting the prior year-end Energy Conservation and Optimization (ECO) Tracker balance by:

- 1) Subtracting the unamortized beginning ECO Tracker account balance;
- 2) Adding financial incentives awarded by the MPUC not reflected in the prior year-end balance;
- 3) Adding actual and anticipated ECO program expenditures at their approved and/or budgeted level for the applicable time period; and
- 4) Subtracting actual and anticipated ECO cost recovery through base rates, determined by multiplying the CCRC (shown below) by the Company's budgeted retail sales in kWh to non-ECO exempt customers for the applicable time period; and
- 5) Subtracting actual and anticipated ECO cost recovery from the applicable CPA factor not accounted for in the prior year-end balance, as determined by multiplying the applicable CPA by the Company's budgeted retail sales in kWh to non-ECO exempt customers for the remaining applicable time period. The remaining applicable time period for the applicable CPA is dependent upon subsequent MPUC approval which, for the purposes of this calculation, Minnesota Power assumes to align with the end of the current fiscal year (June 30, 2025).

Filing Date: April 1, 2025 & ~~November 1, 2023~~ March XX, 2026 **MPUC Docket No:** E015/M-25-48
& E015/GR-23-155E015/PA-26-XX

Effective Date: December 1, 2025 & ~~March 1, 2025~~ **Order Date:** November 20, 2025 & ~~November 25, 2024~~

Approved by: Leah N. Peterson
Leah N. Peterson
Director – Customer Analytics and Market Settlements

RIDER FOR CONSERVATION PROGRAM ADJUSTMENT

All costs appropriately charged to the ECO Tracker account shall be eligible for recovery through this adjustment and all revenues received from the application of the CPA factor shall be credited to the ECO Tracker account.

In order to normalize the effect of significant changes in the CPA factor, the Company may request approval of an upper limit or cap on the calculated CPA factor.

The CPA factor effective December 1, 2025 for all non-ECO exempt customers shall be 0.0817¢ per kWh.

DETERMINATION OF CONSERVATION COST RECOVERY CHARGE (CCRC)

The CCRC is the amount included in base rates dedicated to the recovery of ECO costs as approved by the Minnesota Public Utilities Commission in the Company's last general rate case. The CCRC is approved and applied on a per kWh basis by dividing the test-year ECO expenses by the test-year sales volumes (net of ECO-exempt volumes). All revenues received from the CCRC shall be credited to the ECO Tracker Account.

The CCRC effective March 1, 2025 for all non-ECO exempt customers is 0.458916¢ per kWh.

CUSTOMER EXEMPTIONS AND RATE ADJUSTMENTS

For customers granted an exemption from ECO costs by the Commissioner of the Minnesota Department of Commerce, pursuant to Minn. Stat. § 216B.241, the CPA factor shall not be applicable. No CCRC is included in base rates for Large Power customers. For Large Power customers who have not been granted an exemption, the CCRC of 0.458916¢ per kWh shall apply to the total billing energy. In addition, non-Large Power customers who have been granted an exemption shall receive a billing credit of 0.458916¢ per kWh to offset the CCRC that is included in base rates under the applicable rate schedule. For those customer accounts granted exemption by a decision of the Commissioner after the beginning of a calendar year, any ECO collections billed after January 1 of the year following the Commissioner's decision shall be credited back to customers.

"Qualified large-scale data center" customers that pay the required fee under Minn. Stat. 216B.72 are exempt pursuant to Minn. Stat. § 216B.241 from the requirement to contribute to the Company's Conservation Improvement Program. Upon exemption from conservation program charges, the "qualified largescale data center" customers can no longer participate in the Company's Energy Conservation Improvement Program.

Filing Date: April 1, 2025 & ~~November 1, 2023~~ March XX, 2026 MPUC Docket No: E015/M-25-48
& E015/GR-23-155E015/PA-26-XX

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- 4) Subtracting actual and anticipated ECO cost recovery through base rates, determined by multiplying the CCRC (shown below) by the Company's budgeted retail sales in kWh to non-ECO exempt customers for the applicable time period; and
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Director – Customer Analytics and Market Settlements

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Leah N. Peterson
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STATE OF MINNESOTA)
)ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 14th day of April, 2026, I electronically filed a true and correct copy of Minnesota Power’s Compliance Filing in **Docket No. E015/M-26-126** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket’s Official Service List for this Docket were served as requested.



Tiana C. Heger