

May 1, 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 Minnesota Power's Petition for Approval of
the Annual Automatic Adjustment Charges for the period of
January 2025 through December 2025
Docket No. E015/AA-24-64
REPLY COMMENTS

Dear Ms. Bergman:

Minnesota Power respectfully submits these Reply Comments in response to the Initial Comments submitted by the Minnesota Department of Commerce, Division of Energy Resources in the above referenced Docket.

Please contact me at (218) 591-4870 or avang@mnpower.com if you have any questions regarding this filing.

Kind Regards,



Analeisha Vang
Regulatory Compliance Specialist,
Senior

AV:sr
Attach.

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

In the Matter of Minnesota Power’s Petition for
Approval of the Annual Automatic Adjustment Charges
for the period of January 2025 through December 2025

Docket No. E015/AA-24-64
**MINNESOTA POWER’S
ANNUAL TRUE UP
REPORT AND RATE
ADJUSTMENT PROPOSAL**

I. INTRODUCTION

On April 15, 2026, the Minnesota Department of Commerce, Division of Energy Resources (“Department”) submitted its Comments¹ in the above-referenced Docket to the Minnesota Public Utilities Commission (“Commission”). The Department reviewed Minnesota Power’s (the “Company”) Petition² for approval of the 2025 Annual Automatic Adjustment True-Up Report of Forecasted Fuel and Purchased Energy Rates and concluded that the Company’s actual fuel and purchased power costs for 2025 were reasonable, and that the Company correctly calculated its 2025 Fuel Clause Adjustment (FCA)/Forecasted Purchased Energy (FPE) Rider under-collection of \$3,468,069. The Department requested additional information regarding the 2025 true-up factor and supporting calculations and additional compliance reporting items. The Company provides the requested information in the following Reply Comments.

II. RESPONSES TO REQUESTED INFORMATION

A. 2025 True-Up Factor and Supporting Calculations

The Department requested that the Company provide its 2025 true-up factor and supporting calculations.

¹*In the Matter of Minnesota Power’s Petition for Approval of the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2025*, Department of Commerce Comments, April 15, 2026, Docket No. E015/AA-24-64

²*In the Matter of Minnesota Power’s Petition for Approval of the Annual Automatic Adjustment True-Up Report of the Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2024*, Minnesota Power Petition, March 3, 2026, Docket No. E015/AA-24-64

The True-Up factor is calculated by dividing the True-Up amount of \$3.5M by the applicable 2026 and 2027 sales to which the True-Up rate will apply.

Supporting calculations are provided in Attachment 1 – FAC Calculation 2025 – True Up Rates to these Reply Comments, which include detailed breakdowns of the true-up amount, forecasted sales, and the resulting factor.

B. Other Compliance Items

The Department noted the Company had not provided information on Order Points 4 and 5 of Commission’s August 7, 2025 Order in Minnesota Power’s 2024 True-Up.³ These order points require the Company to provide additional ARR/FTR information, as well as a list of strategies considered and implemented to address congestion and curtailment of energy. The Company will be addressing these order points in the upcoming 2027 FCA Forecast filing on May 1, 2026 in Docket No. E015/AA-26-64.

III. CONCLUSION

Minnesota Power appreciates the Department’s thorough review and recommendations. Based on the Department’s findings and the Company responses provided herein, the Company respectfully requests that the Commission take the following actions:

1. Find Minnesota Power’s actual 2025 fuel and purchased power costs recoverable through the FCA/FPE rider were reasonable for 2025.
2. Find Minnesota Power correctly calculated its 2025 FCA/FPE Rider under-collection of \$3,468,069.
3. Allow Minnesota Power to collect \$3,468,069 in the 12-month period following approval by the Commission.
4. Approve the compliance reporting portions of Minnesota Power’s Petition.

³ *In the Matter of Minnesota Power’s Petition for Approval of Annual Automatic Adjustment Charges for the Period of January 2024 through December 2024*, Minnesota Public Utilities Commission, Order, August 7, 2025, Docket No. E015/AA23-180

Dated: May 01, 2026

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'A. Vang', with a long, sweeping flourish extending to the right.

Analeisha Vang
Regulatory Compliance Specialist, Senior
Minnesota Power
30 W Superior Street
Duluth, MN 55802

STATE OF MINNESOTA)
)ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1st day of **May, 2026** she served Minnesota Power's Reply Comments in **Docket No. E015/AA-24-64** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on the Official Service List were served as requested.



Susan Romans