

March 18, 2026

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E015/M-25-433

Dear Ms. Bergman:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

*In the Matter of Minnesota Power's Petition for Approval of a Transmission
Cost Recovery Rider.*

The Petition was filed by Minnesota Power on December 22, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve the Petition with modifications**, as described herein. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

AU/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/M-25-433

I. INTRODUCTION

Minnesota Power seeks annual cost recovery for the construction of its approved transmission projects.¹ With the proposed adjustment to the utility's tariff within this Rider for Transmission Cost Recovery (TCR), the utility expects to generate revenue to pay for 2026 associated costs of two transmission projects, MISO charges and credits, and MISO Auction Revenue Rights for the Multi-Value Project (MVP). Statutory guidance for seeking approval to annually recover construction costs for transmission projects is outlined in Minn. Stat. § 216B.16, subd. 7b (2026).

Minn. Stat. § 216B.16, subd. 7b 2026 (TCR Statute) authorizes annual recovery of construction costs for certain pre-approved transmission projects. Administratively, the utility requests authorization to recover the costs in the TCR Rider. Each year, Minnesota Power and other utilities must file a Petition that describes its plans to recover transmission-related construction costs subject to Commission approval before implementation of its tariff adjustment factor.

As described in the utility's Petition, Minnesota Power seeks to recover pre-approved construction cost for the following transmission projects and categories:

- Duluth Loop
- High Voltage Direct Current (HVDC) Modernization Project
- Midcontinent Independent System Operator (MISO) Charges and Credits, and
- MISO Auction Revenue Rights (ARR) revenues for the Multi-Value Projects (MVP).²

MP proposes that the 2026 Transmission Factor take effect August 1, 2026, or on the first of the month following Commission approval and no sooner than 90 days from the Petition filing date.³

In these comments, the Department reviews Minnesota Power's Petition to recover costs in its TCR Rider.

¹ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. §216B.16, subd. 7b*, Minnesota Power, December 22, 2025, Docket No. E015/M-25-433 (eDockets) [202512-226103-01](#), hereinafter "Petition".

² Petition at 4.

³ Per MP's Response to DOC IR No. 2.

II. PROCEDURAL BACKGROUND

December 22, 2025 MP submits its Petition for the Utility’s 2026 TCR Rider.

III. SUMMARY OF PROPOSAL

MP’s Petition requests approval of its forecasted 2026 annual revenue requirements, 2025 Tracker Balance, and resulting 2026 Transmission Factors under the TCR to recover certain Minnesota jurisdictional transmission costs.

A summary of MP’s proposed line items and related revenue requirements for the period are included in Table 1 below.⁴

Table 1: Summary of Proposed 2026 MN Revenue Requirements

Item	2026 MN Revenue Requirements
Tracker Balance as of Dec. 31, 2025	\$ 20,358,701
Duluth Loop	\$ 5,996,790
ID# 113305 Duluth Loop Reliability Project	1,964,131
ID# 113316 Ridgeview Sub - Duluth Loop	1,133,238
ID# 113317 Arrowhead Sub - Duluth Loop	510,328
ID# 113318 Hilltop Sub - Duluth Loop	1,312,469
ID# 113539 230kV Projects	1,080,398
Prorata ADIT ⁵	(3,775)
HDVC Modernization	\$ 29,627,587
ID# 113372 HVDC Modernization - ND	13,374,747
ID# 113373 HVDC Modernization - MN	12,567,585
ID# 114425 HTEC Project – MN	997,277
ID# 114426 HTEC Project – ND	1,051,517
ID# 114067 St Louis Cty	822,087
ID# 114374 ND HVDC Mod 345kV	821,990
Prorata ADIT ⁶	(7,614)
Net RECB Revenue & Expenses	\$ 14,239,149
Auction Revenue Rights (ARR) Credit for MVP	\$ (237,868)
Total:	\$ 69,984,359

⁴ Petition Exhibit B-1, Exhibit B-2, Exhibit B-4, and Exhibit B-5.

⁵ Exhibit B-4 at pg. 3 of 30. Prorata ADIT x MN Jurisdictional Allocator. (2,285) x 0.82593 = (3,775).

⁶ Exhibit B-5 at pg. 3 of 36. Prorata ADIT x MN Jurisdictional Allocator. (9,219) x 0.82593 = (7,614).

IV. DEPARTMENT ANALYSIS

A. STATUTORY REQUIREMENTS

The Department searched statutes and Commission Orders to formulate its comments. To facilitate these comments, the Department notes that Minnesota Legislation provides guidance for the recovery of construction costs in a Utility's TCR Rider. The legislative guidance helps the Department verify various aspects of MP's TCR Rider. Such guidance includes criteria on project eligibility, cost minimization of projects, and the parameters retrieved for the construction of costs proposed for recoupment.⁷ Together with Commission Orders, the statutes below help identify the topics for discussion, analysis and resulting recommendations.

To facilitate the Department's discussion of the TCR, the 2026 TCR statute, Minn. Stat. 216b.16, subd. 7b, states:

Subd. 7b. Transmission cost adjustment.

(a) Notwithstanding any other provision of this chapter, the commission may approve a tariff mechanism for the automatic annual adjustment of charges for the Minnesota jurisdictional cost net of associated revenues of:

(1) new transmission facilities that have been separately filed and reviewed and approved by the commission under section 216B.243 or new transmission or distribution facilities that are certified as a priority project deemed to be a priority transmission project under section 216B.2425;

(2) new transmission facilities approved by the regulatory commission of the state in which the new transmission facilities are to be constructed, to the extent approval is required by the laws of that state, and determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system; and

(3) charges incurred by a utility under a federally approved tariff that accrue from other transmission owners' regionally planned transmission projects that have been determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system.

(b) Upon filing by a public utility or utilities providing transmission service, the commission may approve, reject, or modify, after notice and comment, a tariff that:

⁷ As seen within the Statute, an example parameter includes the cost of facilities, paragraph (b)(1).

(1) allows the utility to recover on a timely basis the costs net of revenues of facilities approved under section 216B.243 or certified or deemed to be certified under section 216B.2425 or exempt from the requirements of section 216B.243;

(2) allows the utility to recover charges incurred under a federally approved tariff that accrue from other transmission owners' regionally planned transmission projects that have been determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system. These charges must be reduced or offset by revenues received by the utility and by amounts the utility charges to other regional transmission owners, to the extent those revenues and charges have not been otherwise offset;

(3) allows the utility to recover on a timely basis the costs net of revenues of facilities approved by the regulatory commission of the state in which the new transmission facilities are to be constructed and determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system;

(4) allows the utility to recover costs associated with distribution planning required under section 216B.2425;

(5) allows the utility to recover costs associated with investments in distribution facilities to modernize the utility's grid that have been certified by the commission under section 216B.2425;

(6) allows the utility to recover on a timely basis the costs of upgrades that are not allocated to participating distributed generation facilities under the commission order issued in docket No. E002., E015, or E017/CI-24-288.

(7) allows a return on investment at the level approved in the utility's last general rate case, unless a different return is found to be consistent with the public interest;

(8) provides a current return on construction work in progress, if recovery from Minnesota retail customers for the allowance for funds used during construction is not sought through any other mechanism;

(9) allows for recovery of other expenses if shown to promote a least-cost project option or is otherwise in the public interest;

(10) allocates project costs appropriately between wholesale and retail customers;

(11) provides a mechanism for recovery above cost, if necessary to improve the overall economics of the project or projects or is otherwise in the public interest; and

(12) terminates recovery once costs have been fully recovered or have otherwise been reflected in the utility's general rates.

(c) A public utility may file annual rate adjustments to be applied to customer bills paid under the tariff approved in paragraph (b). In its filing, the public utility shall provide:

(1) a description of and context for the facilities included for recovery;

(2) a schedule for implementation of applicable projects;

(3) the utility's costs for these projects;

(4) a description of the utility's efforts to ensure the lowest costs to ratepayers for the project; and

(5) calculations to establish that the rate adjustment is consistent with the terms of the tariff established in paragraph (b).

(d) Upon receiving a filing for a rate adjustment pursuant to the tariff established in paragraph (b), the commission shall approve the annual rate adjustments provided that, after notice and comment, the costs included for recovery through the tariff were or are expected to be prudently incurred and achieve transmission system improvements at the lowest feasible and prudent cost to ratepayers.

B. 2025 TCR PETITION

MP filed its original 2025 Petition⁸ in November of 2024, and subsequently withdrew it in April 2025⁹. MP refiled its 2025 Petition¹⁰ in August 2025. MP's August 2025 Petition mirrored the November 2024 Petition with the exception that no revenues or expenses associated with the Northland Reliability Project (NRP) and Alexandria – Big Oaks Project were included.¹¹ The Company's primary reason for

⁸ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Power, November 13, 2024, Docket No. E015/M-24-382 (eDockets) [202411-211901-01](#), hereinafter "2025 November Petition."

⁹ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Power, Withdrawal Request, April 8, 2025, Docket No. E015/M-24-382 (eDockets) [20254-217387-01](#).

¹⁰ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Power, August 19, 2025, Docket No. E015/M-24-382 (eDockets) [20258-222233-01](#), hereinafter "2025 August Petition".

¹¹ 2025 August Petition at 4-5.

excluding these two MISO Tranche 1 Long Range Transmission (LRTP) projects (currently MP's only LRTP projects) from the TCR is because MP thinks they are more appropriately considered Federal Energy Regulatory Commission (FERC) jurisdictional projects rather than retail jurisdictional projects.¹²

Removing NRP and the Alexandria-Big Oaks Project increased the revenue requirement by approximately \$5 million.¹³ MP stated the following regarding the cost recovery treatment for NRP and Alexandria-Big Oaks Project:

As part of MISO's Tranche 1 LRTP portfolio, these projects have been determined to have both significant costs and system-wide benefits. Cost associated with these projects are allocated to MISO North members through MISO's Schedule 26A based on each entity's share of energy consumed. Minnesota Power is approximately 2.5 percent of MISO North. Revenues and expenses for LRTP investments are billed and credited to utilities through MISO Schedule 26A. Beginning in 2025, Minnesota Power began receiving revenue from its investments in the NRP and Alexandria-Big Oaks, with the Company's ownership share at approximately 50 percent and 16.5 percent, respectively. Given the substantial gap between the relatively small amount of allocated costs and the much larger investment share of Minnesota Power ownership, these projects are of a different nature than the transmission projects previously included in the TCR, which were more closely aligned with direct customer benefits.

As MISO's LRTP projects are intended to provide system-wide benefits, it is important to align any federal incentives administered through FERC with those bearing the risk associated with building the LRTP projects. Currently the FERC allows a higher return on equity ("ROE") than the ROE approved by the Commission. The Minnesota Supreme Court has determined that it is solely in the utility's discretion as to which projects are included in its TCR, and it stands to reason that investors in these types of projects are entitled to the FERC-allowed ROE. By removing the projects from the TCR, Minnesota Power's shareholders will retain the FERC-allowed ROE, which is a component of Schedule 26A Revenue. With this change, Minnesota Power's retail customers will not pay for these projects, as all cost recovery will be collected at the FERC-jurisdiction through MISO, but customers will still receive the system reliability, expanded capacity, and reduced congestion benefits associated with these projects.¹⁴

¹² *Id.*

¹³ 2025 August Petition at 38-39.

¹⁴ 2025 August Petition at 5-6.

Even though the 2025 August Petition increased the revenue requirement by \$5 million, the Department recognized that MP's proposal to exclude NRP and the Alexandria-Big Oaks Project mirrored Otter Tail Power Company's (Otter Tail or OTP) proposal initially made in its 2016 General Rate Case.¹⁵ Otter Tail proposed a similar "all out" method where Big Stone Lines, a MISO transmission line, be excluded from OTP's TCR and recovery for this transmission line at a FERC jurisdictional level rather than at the retail level. Essentially, Otter Tail was proposing to keep the net MISO revenues including the FERC ROE which was higher than the Commission approved ROE. The Commission initially denied this proposal, which Otter Tail appealed. This case ultimately ended up at the Minnesota Supreme Court where it was determined that it is up to the utility's discretion as to which projects are included in its TCR, and that investors in these types of projects are entitled to the FERC-allowed ROE.¹⁶

As discussed above, MP noted that the "Minnesota Supreme Court has determined that it is solely in the utility's discretion as to which projects are included in its TCR, and it stands to reason that investors in these types of projects are entitled to the FERC-allowed ROE."¹⁷ MP confirmed in reply comments¹⁸ its proposed "all out" method is comparable to the OTP Method and did not identify any differences.

The 2025 TCR Petition was approved by the Commission in the March 2026 Order¹⁹, MP is continuing to propose this "all-out" method in its 2026 TCR Rider Petition.

C. PROJECT ELIGIBILITY

An in-state transmission project is eligible for recovery under the TCR Rider statute if the project is 1) approved under the certificate of need statute, 2) exempt from the certificate of need statute, 3) certified as or deemed to be a priority project under the state transmission plan, or 4) determined to benefit the utility or transmission system by the Midcontinent Independent System Operator (MISO).²⁰ For the 2026 TCR Rider, MP seeks approval to recover costs for the following projects and categories:

- Duluth Loop
- HVDC Modernization Project
- MISO Charges & Credits—This includes the Net RECB Revenue & Expenses, and

¹⁵ *In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota*, Otter Tail Power Company, February 16, 2016, Docket No. E017/GR-15-1033 (eDockets), hereinafter "OTP Method."

¹⁶ *In re the Appl. of Otter Tail Power Co. for Auth. to Increase Rates for Elec. Serv. in the State of Minn.*, 942 N.W.2d 175, 181 (Minn. 2020).

¹⁷ 2025 August Petition at 6.

¹⁸ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Power, Reply Comments, December 11, 2025, Docket No. E015/M-24-382 (eDockets) [202512-225753-01](#), hereinafter "2025 December Reply Comments."

¹⁹ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Public Utilities Commission, March 10, 2026, Docket No. E015/M-24-382 (eDockets) [20263-229100-01](#), hereinafter "March 2026 Order."

²⁰ See 2026 Minn. Stat. § 216B.16, subd. 7b, 216B.243 and 216B.2425.

- Auction Revenue Rights (ARR) Credit for MVP in the Revenue Requirements table above (Table 1).²¹

Based upon Statutory guidance and Orders for approval by the Commission, the Department recommends that the above projects and categories be included in MP's 2026 TCR.²² Given the pool of eligible projects, the Department reviews MP's estimated project costs in accordance with statute and Commission Orders.

D. TCR PROJECT COSTS

The Commission set a standard for evaluating TCR project costs going forward in Xcel Energy's TCR filing in Docket No. 09-1048.²³ In its April 7, 2010, Order for the assignment of project costs, the Commission stated:

[...] the Commission finds that TCR project cost recovery through the rider should be limited to the amount of the initial cost estimates at the time the projects are approved as eligible projects, with the opportunity for the Company to seek recovery of excluded costs on a prospective basis in a subsequent rate case. A request to allow cost recovery for project costs above the amount of the initial estimate may be brought for Commission review only if unforeseen or extraordinary circumstances arise on a project.

The Commission applied this same approach to Otter Tail Power Company in its 2013 TCR in Docket No. 13-103.²⁴ In its March 10, 2014, Order, the Commission stated:

Accordingly, the Commission continues to believe that project costs included in the TCR rider should be capped at certificate of need levels. [...]

[I]mposition of a cap protects the integrity of the certificate of need process, in which it is critical that the cost estimates for the alternatives being compared are as reliable as possible. And capping costs at the

²¹ Petition at 4.

²² *Order Granting Certificate of Need and Issuing Route Permit*, April 3, 2023, Docket No. E-015/CN-21-140 (eDockets) [20234-194456-02](#), at 12; *Order Granting Certificate of Need and Issuing Route Permit*, October 25, 2024, Docket No. E-015/CN-22-607, (eDockets) [202410-211332-01](#), at 22; and *In the Matter of Minnesota Power's Request for Approval of its 2022 Transmission Factors under its Transmission Cost Recovery Rider*, Minnesota Department of Commerce, Comments, May 23, 2022, Docket No. E015/M-21-857, (eDockets) [20225-185991-01](#), at 8.

²³ *Order Approving 2010 TCR Project Eligibility and Rider, 2009 TCR Tracker Report, and TCR Rate Factors*, April 27, 2010, Docket No. E-002/M-09-1048, (eDockets) [20104-49616-01](#), at 6; *Order Granting Certificate of Need and Issuing Route Permit*, October 30, 2024, Docket No. E002, E017, ET2, E015, ET10/CN-22-538, (eDockets) [202410-211465-02](#), at 6.

²⁴ *Order Capping Costs, Denying Rider Recovery of Excess Costs, and Requiring Inclusion of All Miso Schedule 26 Costs And Revenues in TCR Rider*, March 10, 2014, Docket No. E-017/M-13-103, (eDockets) [20143-97156-01](#), at 4.

certificate of need levels is consistent with the Commission's actions in similar cases involving other utilities' riders. [...]

In the absence of a rate case, the best available proxy for determining prudence and reasonableness is the cost determination made on the record of a certificate of need or cost recovery eligibility proceeding. Here, the relevant proceeding is a certificate of need case. Otter Tail should continue recovering the costs it sponsored in its certificate of need case unless and until it demonstrates in a rate case that higher costs are prudent and reasonable. [Footnotes omitted.]

D.1. Duluth Loop

Given past Commission Orders, MP discusses its construction costs estimates for the Duluth Loop Project.²⁵ In its Certificate of Need and Route Permit Application approved by the Commission, MP estimated the capital cost range of the Project between \$50 million and \$70 million (in 2021 dollars).²⁶ The Department requested MP to escalate the high end of the range, \$70 million, to 2026 dollars. MP calculated the high end of the range to be \$109 million (in 2026 dollars).²⁷

In the 2024 TCR, the Department noted that cost estimates were trending toward \$70 million because of rising material and labor costs. MP stated in an Information Request that it would closely monitor costs and supply chain risks as they arose.²⁸

In the 2025 TCR, the Department analyzed the cost impacts of the project delays due to supply chain issues and acquiring its wetland permit.²⁹ At the time of MP's initial filing, the in-service date was December 2025.³⁰ MP's in-service date is currently December 2026.³¹

Final testing and commissioning work is in process at all three substations.³² Remaining work is expected to continue through 2026, while meeting the anticipated in-service date of December 2026.³³

²⁵ Petition at 32-34.

²⁶ *Order Granting Certificate of Need and Issuing Route Permit*, Public Utility Commission, April 3, 2023, Docket No. E-015/CN- (eDockets) [20234-194456-02](#), at 12. The cost estimates can be found in *Findings of Fact, Conclusions of Law, and Recommendation*, Office of Administrative Hearings, December 15, 2022, Docket No. E-015/CN-21-140 (eDockets) [202212-191387-01](#), at 33 and 83.

²⁷ Per MP's Response to DOC IR No. 5.

²⁸ *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider Under Minn. Stat. § 216B.16, subd. 7b*, Public Utility Commission, March 5, 2024, Docket No. E-015/M-23-460, (eDockets) [20243-204071-01](#).

²⁹ 2025 August Petition, at 11-12.

³⁰ *Certificate of Need and Duluth Loop ROUTE Permit Application for the Duluth Loop Reliability Project*, Minnesota Power, October 21, 2021, Docket No. E015/CN-21-140, (eDockets) [202110-179004-03](#), at 2-11.

³¹ Petition at 23.

³² Petition at 23 and per MP's Response to DOC IR No. 3.

³³ Petition at 23 and per MP's Response to DOC IR No. 3.

In the current Petition, the Department notes that MP’s proposed 2026 revenue requirements for the Duluth Loop are based on net plant costs of approximately \$73 million and construction work in-progress (CWIP) costs of approximately \$40 million, for a total of approximately \$113 million through 2026.³⁴ Thus, the Department concludes the Company’s current Duluth Loop capital project costs exceed the capital cost range established in the Certificate of Need and Route Permit proceeding by \$4 million, as calculated below.

Table 2: Duluth Loop Capital Spend Compared to Cost Cap

CWIP	\$39,942,048
Net Plant	\$72,731,507
Proposed Capital Spend for Recovery	\$112,673,555
Capital Cost Cap in 2026 Dollars	\$108,953,301 ³⁵
Capital Spend Over/(Under) Cap	\$3,720,254

As noted above, the Commission continues to believe that project costs included in the TCR rider should be capped at certificate of need levels. MP’s total proposed capital spend recovery of \$112.7 million is above \$109 million (in 2026 dollars). The Department therefore recommends the Commission require MP to adjust its proposed rate recovery to cap the Duluth Loop total capital spending at the \$109 million required figure. The remaining \$3.7 million in capital expenditures can be requested for recovery with justification to support cost overrun in the Company’s next rate case.

D.2. HVDC Modernization

MP discusses its cost estimates for the HVDC Modernization project.³⁶ The Department verified that the \$660-\$940 million is the same as authorized by the Commission in MP’s Certificate of Need.³⁷

In the current Petition, the Department notes that MP’s proposed 2026 revenue requirements for the HVDC Modernization project are based on CWIP costs of approximately \$523 million.³⁸ Thus, the Department concludes the Company’s HVDC Modernization capital project costs are under the initial cost estimates established in the Certificate of Need proceeding.

Currently, MP is completing the permitting process and construction began in May 2025. The project in-service date is now scheduled for April 2030.³⁹ The Company’s in-service date was initially scheduled for December 2028, however, when MP reached out to its preferred supplier, the earliest

³⁴ Petition, Exhibit B-4 at 3.

³⁵ Per MP’s Response to DOC IR No. 5: $70,000,000 \times (1,266.193/813.5) = 108,953,301$.

³⁶ Petition at 26-28.

³⁷ *In the Matter of the Application of Minnesota Power for a Certificate of Need for the HVDC Modernization Project in Hermantown, Saint Louis County*, Office of Administrative Hearings, June 21, 2024, Docket No. E-015/CN-22-607, (eDockets) [20246-207868-02](#), at 32, 138-140. See Also, *Order granting certificate of need and issuing route permit*, March 5, 2024, Docket No. E-015/CN-22-607, (eDockets) [202410-211332-01](#), at 22-23.

³⁸ Petition, Exhibit B-5 at 3.

³⁹ Petition at 22.

implementation date for the equipment used in the HVDC terminals that MP could secure was April 2030.⁴⁰

D.3. MISO Transmission Projects

During the 2008 Minnesota Legislative Session, Minn. Stat. § 216B.16, subd. 7 was amended to allow utilities providing transmission service to recover the charges incurred by a utility “that accrue from other transmission owners’ regionally planned transmission projects that have been determined by MISO to benefit the utility,” as provided for under a “federally approved tariff,” upon Commission approval. The Statute further requires any recovery to “be reduced or offset by revenues received by the utility and by amounts the utility charges to other regional transmission owners, to the extent those revenues and charges have not been otherwise offset.”

In its June 23, 2009 Order, the Commission directs the Company to “provide supporting documentation to substantiate the actual RECB charges incurred during the upcoming year as part of future Rider filings.”⁴¹ MP provided the required documentation in its Petition.⁴²

In its Petition, MP proposed to include net RECB charges (MISO Schedules 26/26A, 37 and 38) totaling \$17,240,140 on a Total Company basis and \$14,239,149 on a Minnesota Jurisdictional basis in its TCR for cost recovery.⁴³ The Company provided a detailed calculation of its RECB revenues and expenses by MISO schedule in Exhibit B-2 of the Petition. The Petition excludes Schedule 26A revenue because it was all generated from the Alexandria-Big Stone Project and therefore is being allocated to the FERC jurisdiction rather than the retail jurisdiction.

The Department reviewed MP’s calculations and proposal to recover its net RECB charges in the TCR Rider and concludes that the Company’s calculation is reasonable.

E. NET REGIONAL EXPANSION AND COST BENEFIT (RECB) CHARGES (MISO SCHEDULES 26/26A, 37 & 38)

Minnesota Statutes § 216B.16, subd. 7b(b)(2) permits the Commission to approve, reject, or modify, after notice, a tariff that “allows the utility to recover charges incurred under a federally approved tariff that accrue from other transmission owners’ regionally planned transmission projects that have been determined by [MISO] to benefit the utility or integrated transmission system.” The statute requires that any recovery “be reduced or offset by revenues received by the utility and by amounts the utility charges to other regional transmission owners, to the extent those revenues and charges have not been otherwise offset.”

⁴⁰ Petition at 30.

⁴¹ *In the Matter of Minnesota Power’s Request for Approval of its 2009 Rate Adjustment Mechanism under its Transmission Cost Recovery Rider*, Order Approving Transmission Factors with Conditions, June 23, 2009, Docket No. E-015/M-08-1176, (eDockets) [20096-38819-01](#), at 4.

⁴² Petition at Exhibit C-1.

⁴³ Petition at Exhibit B-2, at 4.

MISO's regionally planned transmission projects are also called Regional Expansion and Cost Benefit (RECB) projects. Moreover, RECB charges and revenues are generally reflected under MISO Schedules 26/26A. MISO Schedule 26 includes other regionally shared projects such as Market Efficiency Projects and Generation Interconnection Projects. MISO Schedule 26A includes projects deemed as Multi-Value Projects (MVPs).

In addition to MISO Schedules 26/26A, utilities also receive revenues related to regionally shared projects under MISO Schedules 37 and 38. MISO Schedule 37 revenues represent a utility's share of contributions MISO receives from American Transmission Systems, Inc., which left MISO on June 1, 2011 to integrate with PJM. Likewise, MISO Schedule 38 revenues represent a utility's share of payments from Duke-Ohio and Duke-Kentucky, which left MISO on December 31, 2011, but have an ongoing obligation to pay for MISO projects due to their previous membership.

In its June 23, 2009 Order in Docket No. E015/M-08-1176, the Commission directed the Company to "provide supporting documentation to substantiate the actual RECB charges incurred during the upcoming year as part of future Rider filings." MP provided the required documentation in Exhibit C-1 of its petition.

As shown in Exhibit B-2, Page 4 of its petition, MP proposes to include net RECB charges (MISO Schedules 26/26A, 37 and 38) totaling \$14,239,149 in its TCR revenue requirements. The Company provided a detailed calculation of its RECB revenues and expenses by MISO schedule in Exhibit B-2 of the petition. As discussed above, the Petition excludes Schedule 26A revenue because it was all generated from the Alexandria-Big Stone Project and therefore is being allocated to the FERC jurisdiction rather than the retail jurisdiction.

The Department reviewed and agrees with MP's calculation and proposal to recover its net RECB charges in the current petition.

F. MVP AUCTION REVENUE RIGHTS (ARR)

As described in the Petition, MISO Auction Revenue Rights (ARR) revenues are MP's entitlement to a share of revenue generated in annual Financial Transmission Rights (FTR) auctions.⁴⁴ MP states that its firm historical usage of MISO's transmission system determines its share and, depending upon the FTR auction clearing price of an ARR path, the share could result in revenue or a charge.

On page 35 of its Petition, MP stated it included MVP ARR revenues for MVPs that the Company does not own but is allocated a portion of the costs and revenues as a MISO member. As shown in Exhibit B-2, page 3 of the Petition, MP proposed to credit retail customers (\$237,868) for their estimated jurisdictional share of 2026 MVP ARR revenues.

The Department reviewed MP's proposed treatment of MVP ARR revenues and agrees with its approach.

⁴⁴ Petition, page 4.

G. TRACKER BALANCE

As shown in Exhibit B-1, MP proposed to recover its 2025 tracker balance of \$20,358,701 to reflect prior under-recoveries.⁴⁵ MP's tracker balance calculations are shown in Exhibit B-2. In addition, MP's Petition notes that the tracker balance for Large Power Class is \$12.6 million and that the balance for all other classes is \$7.7 million.⁴⁶

The Department reviewed MP's tracker calculations as shown in Petition Exhibit B-2 and recommends the Commission approve MP's 2025 tracker balance for recovery in the 2026 revenue requirements.

H. OTHER WHOLESALE TRANSMISSION REVENUES (NON-RECB)

The Department has noted in the past that the bulk of Minnesota regulated electric utilities' transmission assets over 100 kilovolts are non-RECB projects for MISO purposes and are included in the utilities' base rates rather than in a transmission rider.⁴⁷ As such, any wholesale transmission revenues and expenses (MISO Schedule 9 revenues and expenses) associated with these facilities are now generally reflected in base rates.⁴⁸

However, in addition to the wholesale transmission revenues and expenses through MISO Schedules 26/26A for RECB projects as discussed above, some utilities receive other wholesale transmission revenues from third-party transmission customers who are charged the utility's Federal Energy Regulatory Commission (FERC) jurisdictional MISO tariff⁴⁹ rate for the use of the utility's non-RECB transmission system. Similar to RECB charges reflected in MISO Schedules 26/26A, these non-RECB charges are reflected in MISO Schedule 9 revenues for the party that owns the transmission assets and in MISO Schedule 9 expenses for any party that uses the transmission assets (including the assets' owner).

While most of these costs and revenues are reflected in utilities' base rates, sometimes Minnesota rate-regulated utilities have non-RECB transmission projects that qualify for TCR Rider recovery. In those instances, some utilities have provided a net credit⁵⁰ in their TCR Rider to account for revenues it expects to receive from MISO for other utilities' use of the transmission asset. This net credit reflects the difference between what the utility pays MISO for using its own non-RECB transmission asset and what the utility receives from MISO for other utilities' use of the asset.

⁴⁵ Petition at Exhibit B-1, at 1.

⁴⁶ Petition at 36.

⁴⁷ Petition at 23 and 38, *In the Matter of Minnesota Power's Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b*, Minnesota Power, October 24, 2023, Docket No. E-015/M-23-460 (eDockets) [202310-199855-01](#), at 11.

⁴⁸ Petition at 21 and 35.

⁴⁹ Utility-specific rates are contained in Attachment O of MISO's Open Access Transmission Tariff (OATT).

⁵⁰ As opposed to MISO Schedules 26/26A revenues and expenses which are reflected at gross in Minnesota rate-regulated utilities TCR Riders. The gross and net methods produce the same results. However, the Department generally prefers the gross method since it reflects all the MISO revenues and expenses associated with a specific project.

For example, if FERC determined annual revenue requirements for a specific non-RECB project totaled \$100 and MP were the owner, the \$100 would be allocated and charged to all utilities located in MP's transmission pricing zone, based on their respective loads in that zone. If MP makes up 80% of the load in its own transmission pricing zone, MP would be required to pay MISO \$80 in Schedule 9 expenses (paying MISO for MP's use of its own facilities). The other utilities with load in MP's transmission pricing zone would pay the remaining \$20 in MISO Schedule 9 expenses to reflect their reliance on MP's facilities. MISO would pay MP the entire \$100 in MISO Schedule 9 revenues for its ownership of the project. The difference between what MP pays and receives for its ownership of the non-RECB project is the \$20 net credit.⁵¹

It is the Department's understanding that both the Duluth Loop and HVDC Modernization projects are considered to be non-RECB projects for MISO purposes. MP confirmed that no net credits from MISO under Schedule 9 have been received at this time for other utilities use in 2026, as described below.⁵²

The Duluth Loop Project is located entirely within the Minnesota Power local balancing authority area and it is a baseline reliability project that does not qualify for cost allocation under the MISO Tariff. Therefore, the Company has not received any direct net credits from MISO for other utilities use of the Duluth Loop project facilities. The HVDC Modernization Project is not projected to be in service until late 2028, at the earliest, therefore, no net credits have been received.

The Department understands that the Duluth Loop Project is a network of 115 kV transmission lines and substations that were approved by MISO. The Department recommends MP explain in reply comments whether there is any other load (other than MP) in its local transmission pricing zone. If so, please explain in reply comments whether MP will receive MISO Schedule 9 revenues from MISO for the Duluth Loop Project once the project goes into service (expected in December 2026). In addition, the Department recommends the Commission require MP to report in future TCR riders any net credits it received from MISO for other utilities use of the Duluth Loop and HVDC Modernization projects once they are in-service, as well as any other applicable future projects.

I. INTERNAL CAPITALIZED COSTS

In a previous transmission factor proceeding (Docket No. E015/M-11-695), the Commission determined MP's internal capitalized costs should be excluded from recovery under the Company's

⁵¹ Sometimes the net credit is presented in percentage terms. In this example, the net credit would equal 20% of the revenue requirements.

⁵² Per MP's Response to DOC IR No. 4.

TCR Rider.⁵³ As explained in MP's Petition, the Company complied with the Commission's directive and excluded internal capitalized costs.⁵⁴

The Department reviewed MP's proposed accounting for internal capitalized costs and concludes the Company complied with the Commission's directive.⁵⁵

J. RATE OF RETURN ON INVESTMENT

Minn. Stat. § 216B.16, subd. 7b (2026) allows utilities to charge ratepayers a return on investment at the level approved in the utility's last general rate case, unless a different return is found to be consistent with the public interest. As explained on pages 41 and 42 of the Petition, MP proposes to use its equity and debt components approved in its last retail rate case (Docket No. E015/GR-23-155) to calculate its return on investment in this proceeding.

The Department notes that the ALLETE Acquisition in Docket E015/PA-24-198 required the Return on Equity (ROE) to be decreased from 9.78% to 9.65%. The Department asks MP to provide an analysis of the financial impact of the ALLETE Acquisition ROE requirement on the current Petition in their Reply Comments.

K. ALLOCATION

Minn. Stat. § 216B.16, subd 7b (2026) requires utilities to allocate project costs appropriately between wholesale and retail customers. As shown in Exhibit B-3 of its petition⁵⁶, MP proposes to use the jurisdictional demand allocators the Commission approved in its 2024 retail rate case (Docket No. E015/GR-23-155) to allocate costs between the Large Power class and non-Large Power retail customer classes.

Since MP's proposal is consistent with the Commission's prior allocation determinations, the Department agrees with this approach.

L. PRORATED ACCUMULATED DEFERRED INCOME TAXES

MP proposes its 2026 Transmission Factors will take effect on August 1, 2026, or the first of the month following Commission approval. For tax purposes, 2026 is considered a future year, therefore MP must use the *pro rata* calculation. The calculation helps avoid a violation to the normalization for the allocation factors, which is required by the IRS when taking accelerated depreciation.

⁵³ *In the Matter of Minnesota Power's Petition for Approval of its 2011 Transmission Cost Recovery Rider Factor*, Order, November 12, 2013, Docket No. E-015/M-11-695, (eDockets) [201311-93584-01](#), at 4.

⁵⁴ Petition at 12, 37, in Exhibit B-4, and Exhibit B-5.

⁵⁵ For purposes of this docket, the Department agrees with MP that evidence that Internal Capital costs are excluded from the current TCR is by noting there are no line items in Exhibit B-4 (Duluth Loop Project) and B-5 (HVDC Modernization Project).

⁵⁶ Exhibit B-3, page 2.

Based on its review, the Department recommends approval of MP's *pro rata* method.

M. POTENTIALLY ELIGIBLE PROJECTS

The Commission's Ordering Point 7 from the December 3, 2020, *Order Approving Transmission Cost Recovery, Clarifying Prior Order, and Requiring Filings* requires MP to include descriptions of all potentially eligible TCR projects.⁵⁷ The Company is required to list the projects it will seek recovery of in the future, and the impacts those projects will have on the Transmission Cost Recovery Factor.

MP's current Petition states that "there are currently no potentially eligible projects seeking Commission approval through the regulatory review process."⁵⁸ MP does identify two projects assigned to the FERC jurisdiction for which MP will not be seeking recovery through the TCR. Both projects are with the Tranche 1 Long Range Transmission Planning portfolio of new transmission projects that was approved by the MISO Board of Directors on July 25, 2022. MP plans to take part in the Northland Reliability Project and the Eastern Segment of the Big Stone South – Alexandria – Big Oaks 345 kV Transmission Line Project.

Based on the above, the Department concludes MP complied with Ordering Point No. 7 of the Commission's December 3, 2020, Order.

N. RATE DESIGN

The TCR is applicable to electric service under all of MP's Retail Rate Schedules including Large Power, except its Competitive Rate Schedules 73 and 79. In addition, it applies to service under the Large Power Interruptible and Large Power Incremental Production Service riders.⁵⁹ MP proposes to allocate the retail revenue requirement Transmission Demand jurisdictional and class allocators reflecting the outcomes of the Company's 2024 rate case as discussed above.⁶⁰

Within the Large Power class, MP proposes to incorporate both a demand and an energy rate adder by splitting the Large Power customer retail revenue requirement between demand and energy based on the demand and energy revenue split (approximately 50% demand/50% energy) consistent with MP's most recent rate case in Docket No. E015/GR-23-155.⁶¹

This is the same method that was used to allocate costs within the Large Power class in previous MP TCR Rider filings. The Department agrees with this approach.

⁵⁷ *Order Approving Transmission Cost Recovery, Clarifying Prior Order, and Requiring Filings*, December 3, 2020, Docket No. E-015/M-19-440 (eDockets) [202012-168746-01](#), at 6.

⁵⁸ Petition at 6-7.

⁵⁹ Petition at Exhibit A, at 1.

⁶⁰ Petition at 41-42.

⁶¹ Petition at Exhibit B-1, at 1.

O. BILL IMPACT AND TARIFF REVIEW

As stated above, MP proposes its 2026 Transmission Factors will take effect on August 1, 2026, or the first of the month following Commission approval. Table 3 below summarizes the bill impact of Minnesota Power’s proposal.

Table 3: Minnesota Power’s Proposed Bill Impact⁶²

	Current Rate	Proposed Rate	Increase
Large Power (\$/kW per month)	0.83	3.44	2.61
Large Power (\$/kWh)	0.117	0.498	0.381
All Other Classes (\$/kWh)	0.305	0.961	0.656

The Department reviewed the calculations for the proposed rates and finds them to be calculated correctly. In addition, Petition Exhibit A provides a copy of the revised tariff for the transmission rider, which was updated for the proposed rates. The current and proposed rates in Petition Exhibit A correspond to Table 3 above.

P. INFLATION COMPARISON

Order Point 2 of the Commission’s December 10, 2025, Order in Docket No. E015/PA-24-198 requires MP to “include a comparison of its requested rate increase and the annual rate of inflation in any general rate case, rider, filing, or any other proceeding that would request an increase to residential customer rates.”⁶³ The Company provides an inflation comparison in Petition Table 7. From the Department’s perspective, the information the Company provided is sufficient to conclude MP has complied with the requirements of the Order.

V. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Petition, the Department has prepared recommendations, which are provided below.

- The Department recommends the Commission approve MP’s Petition with the modification to require MP to adjust its proposed rate recovery to cap the Duluth Loop total capital spending at \$108,953,301, reducing capital expenditures by \$3,720,254.

⁶² Petition, Exhibit B-1 at 1.

⁶³ *In the Matter of the Petition of Minnesota Power for Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners*, PUC, Order, December 10, 2025, Docket No. E015/PA-24-198 (eDockets) [202512-225721-01](#), at 9 and 31.

- The Department recommends MP explain in reply comments whether it will receive MISO Schedule 9 revenues from MISO for the Duluth Loop Project once the project goes into service (expected in December 2026).
- The Department recommends the Commission require MP to report in future TCR riders any net credits it receives from MISO for other utilities use of the Duluth Loop and HVDC Modernization projects once they are in-service, as well as any other applicable future projects.
- The Department notes that the ALLETE Acquisition in Docket E015/PA-24-198 required the Return on Equity (ROE) to be decreased from 9.78% to 9.65%. The Department asks MP to provide an analysis of the financial impact of the ALLETE Acquisition ROE requirement on the current Petition in their Reply Comments.
- The Department recommends the Commission require MP to file updated proposed tariff revisions to reflect the above modifications.

Attachments



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-25-433
Requested From: Minnesota Power
Type of Inquiry: Financial

Nonpublic Public
Date of Request: 1/22/2026
Response Due: 2/2/2026

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Ashley Uphus, Mark Johnson
Email Address(es): ashley.uphus@state.mn.us; mark.a.johnson@state.mn.us
Phone Number(s): 651-539-1787; 651-539-1824

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 2
Topic: Effective Date
Reference(s): Petition, page 9

Request:

Page 9 of the Petition states "Minnesota Power proposes that the 2026 Transmission Factor take effect August 1, 2025, or the first of the month following Commission approval and no sooner than 90 days from the Petition filing date".

- a. Please confirm Minnesota Power proposes that the 2026 Transmission Factor take effect August 1, 2026, or the first of the month following Commission approval and no sooner than 90 days from the Petition filing date.

Response:

- a. Yes, Minnesota Power proposes that the 2026 Transmission Factor take effect August 1, 2026, or the first date of the month following Commission approval and no sooner than 90 days from the Petition filing date. The Company apologizes for inadvertently stating the year as 2025, rather than 2026.

To be completed by responder

Response Date: January 29, 2026
Response by: Lori Hoyum
Email: lhoyum@mnpower.com
Phone Number: (218) 269-0712



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

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Date of Request: 1/22/2026
Response Due: 2/2/2026

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Assigned Analyst(s): Ashley Uphus, Mark Johnson
Email Address(es): ashley.uphus@state.mn.us; mark.a.johnson@state.mn.us
Phone Number(s): 651-539-1787; 651-539-1824

ADDITIONAL INSTRUCTIONS:

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Request Number: 3
Topic: Duluth Loop Project Schedule
Reference(s): Petition at 23

Request:

The Petition includes the following anticipated completion dates, please verify each component is complete:

- a. Physical construction work at Ridgeview Substation completed by December 2025;
- b. Upgrades to the 230kV line of the Duluth Loop Project and the wreck-out of the former 98L tap completed by November 2025; and
- c. 115kV transmission line segment 56L completed in December 2025.

Request:

- a. Physical construction work at the Ridgeview Substation was completed on December 18, 2025.
- b. Upgrades to the 230kV line of the Duluth Loop Project and the wreck-out of the former 98L tap were completed December 2, 2025.
- c. The 115kV transmission line segment 56L was completed December 18, 2025.

To be completed by responder

Response Date: January 29, 2026
Response by: Lori Hoyum
Email Address: lhoyum@mnpower.com
Phone Number: (218) 269-0712



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
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Response Due: 2/2/2026

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Assigned Analyst(s): Ashley Uphus, Mark Johnson
Email Address(es): ashley.uphus@state.mn.us; mark.a.johnson@state.mn.us
Phone Number(s): 651-539-1787; 651-539-1824

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Request Number: 4
Topic: Other Wholesale Transmission Revenues
Reference(s): See the body of this information request.

Request:

Please provide any net credits the Company receives from MISO under Schedule 9 for other utilities use of the Duluth Loop and HVDC Modernization projects in 2026.

Request:

The Duluth Loop Project is located entirely within the Minnesota Power local balancing authority area and it is a baseline reliability project that does not qualify for cost allocation under the MISO Tariff. Therefore, the Company has not received any direct net credits from MISO for other utilities use of the Duluth Loop project facilities. The HVDC Modernization Project is not projected to be in service until late 2028, at the earliest; therefore, no net credits have been received.

To be completed by responder

Response Date: January 29, 2026
Response by: Lori Hoyum
Email Address: lhoyum@mnpower.com
Phone Number: (218) 269-0712



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-25-433
Requested From: Minnesota Power
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Nonpublic Public
Date of Request: 1/22/2026
Response Due: 2/2/2026

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Email Address(es): ashley.uphus@state.mn.us; mark.a.johnson@state.mn.us

Phone Number(s): 651-539-1787; 651-539-1824

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 5
Topic: Duluth Loop Inflation Increase
Reference(s): Petition Exhibit B-4, Page 30

Request:

- a. Please explain how the project cost escalations factors for 2021 to 2026 in Exhibit B-4, page 30, are being used/applied.
- b. Please escalate the initial estimate of \$70 million to 2026 dollars using the same escalation factor in Exhibit B-4, page 30.

Response:

- a. Refer to the first tab labeled Project Costs in DOC IR 01.3 Attach labeled "Duluth Loop – Inflation Increase 2026" for the formulas showing the application of the Handy Whitman Factors. The factors are used to deflate current nominal dollars back to dollars of a selected year. For example, the 2026 current dollars of \$28,541,360 are deflated back to 2021 dollars by the ratio of the 2021 factor divided by the 2026 factor, or $\$28,541,360 \times (813.5/1,266.2) = \$18,337,171$. This approach is consistent with prior applications of the Handy Whitman Factors in prior TCR (transmission cost recovery) rider filings where applicable.
- b. The \$70 million (2021 dollars) initial estimate escalates to \$109 million (2026 dollars) using the factor in Exhibit B-4, page 30.

$$\$70 \text{ million} \times (1,266.193/813.5) = \$109 \text{ million}$$

To be completed by responder

Response Date: January 29, 2026
Response by: Stewart Shimmin
Email Address: sshimmin@mnpower.com
Phone Number: (218) 355-3562

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E015/M-25-433

Dated this **18th** day of **March 2026**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-433
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-433
3	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-433
4	Jennifer	Cady	jjcady@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-433
5	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-433
6	Jackson	Evans	jjevans@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-433
7	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-433
8	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-433
9	Jennifer	Kuklenski	jkuklenski@mnpower.com	Minnesota Power		30 W Superior St, Duluth, MN, 55802 Duluth MN, 54534 United States	Electronic Service		No	M-25-433
10	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-433
11	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-433
12	Jess	McCullough	jmccullough@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-433
13	Debbie	Mencel	dmencel@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN,	Electronic Service		No	M-25-433

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55802-2093 United States				
14	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-433
15	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-433
16	Sarah	Whiting	swhiting@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	M-25-433