

April 14, 2022

PUBLIC DOCUMENT

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/AA-20-463

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

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 2021.

The Petition was filed on March 1, 2022 and corrected on April 1, 2022 by:

Hillary A. Creurer, Regulatory Compliance Manager
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The Department recommends the Minnesota Public Utilities Commission (Commission) **approve** Minnesota Power's petition. The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ HOLLY SODERBECK
Financial Analyst

/s/ NANCY CAMPBELL
Financial Analyst Coordinator, CPA

Analysts HS, NC/ja
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/AA-20-463

I. INTRODUCTION

On March 1, 2022, Minnesota Power (Minnesota Power or the Company) filed its Annual Automatic Adjustment 2021 True-Up Report (Petition) of the Company's Fuel and Purchased Energy (FPE) rates for calendar year 2021 with the Minnesota Public Utilities Commission (Commission). The Company submitted its [Petition](#) pursuant to the Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03-802 and the applicable reporting requirements provided for in Minnesota Rules 7825.2800 to 7825.2840. Minnesota Power requests the Commission approve the 2021 true-up for the Company's Forecasted Fuel and Purchased Energy rates and find the Company's filing complies with the applicable reporting requirements.

On April 1, 2022, Minnesota Power filed a [correction](#) to its March 1, 2022 filing. Minnesota Power explained:

The Company discovered an error in the 2022 Rate Impact spreadsheet which was included in Attachment No. 2 on Page 26 of the March Filing. The Municipal sales were inadvertently included in the total retail FAC [Fuel Adjustment Clause] MWh sales used to calculate the True-up rate.

The instant comments address the March 1, 2022 filing and the April 1, 2022 correction.

On December 22, 2020, the Commission authorized Minnesota Power to implement its 2021 Fuel Clause Adjustment (FCA) forecast based on forecasted sales of 8,187,964 MWh and forecasted fuel costs of \$216.4 million¹.

On July 30, 2021, the Company submitted a proposal to increase the approved monthly fuel cost rates for September through December 2021 by \$8.4 million, related to two unforeseen weather-related outages which impacted the Company's High Voltage Direct Current (HVDC) Transmission line. Minnesota Power used the 30-day notice period and received no objection to the proposed rate adjustment².

In the instant Petition, the Company's actual 2021 sales were 9,194,640 MWh (12 percent greater than forecasted) and actual fuel costs were \$318.0 million (46.9 percent greater than originally forecasted). Minnesota Power's petition states it under collected fuel costs by \$55.8 million. In addition, Minnesota

¹ Petition, p. 1.

² Petition, p. 1.

Power states in its Petition it over refunded 2020 fuel costs by approximately \$500,000 due to higher than forecasted sales during September 2021 through December 2021. Minnesota Power proposes a 2021 FCA true-up amount of approximately \$56.3 million.³

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Minnesota Power's Petition and Correction to determine (1) whether the Company's actual 2021 energy costs were reasonable and prudent, (2) whether the Company correctly calculated the 2021 true-up for its FPE rates, and (3) whether the Petition complies with the reporting requirements set forth in the applicable Minnesota Rules and Commission Orders. Minnesota Power's FPE and Fuel Clause Adjustment (FCA) refer to essentially the same cost recovery mechanism and are used interchangeably throughout the instant comments.

A. SUMMARY OF RECENT FUEL CLAUSE ADJUSTMENT REFORM

[Minnesota Statutes § 216B.16](#), subd. 7 authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their FCA rates monthly to reflect, on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation (Docket No. E999/CI-03-802) to explore possible changes to the FCA and invited stakeholders to comment on the purpose, structure, rationale, and relevance of the FCA. The Commission's December 19, 2017 [Order](#) in Docket No. E999/CI-03-802 approved certain reforms to the FCA mechanism. Specifically, Order Point 1 of the December 19, 2017 [Order](#) approved the Department's FCA reform proposals as follows:

- a. The Commission will set recovery of the electric utility's fuel, power purchase agreement, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.
- b. Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- c. The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- d. Each electric utility will be allowed to track any changes in \$/MWh fuel clause costs that occur over the year and there will be no carrying charge on the tracker.

³ Petition, pp. 2-3.

- e. Annually, each electric utility will report actual \$/MWh fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year. The emphasis is on the overall average actual \$/MWh even if actual monthly costs vary from expected monthly costs.
- f. Each electric utility will refund any over-collections and show the prudence of costs before recovering under-collections. If annual revenues collected are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs, the utility must show why it is reasonable to charge the higher costs (under collections) to ratepayers through a true-up mechanism.

The Commission's December 12, 2018 [Order](#) in Docket No. E999/CI-03-802 modified the FCA reform previously approved in the Commission's December 19, 2017 *Order* in the same docket. In particular, the December 12, 2018 *Order*:

- Established a January 1, 2020 implementation date for the FCA reform.
- Required the utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year following the relevant calendar year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.
- Granted the relevant utilities a variance to Minnesota Rule 7825.2600, subpart 3, which requires the FCA be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base rates annually.

The Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03/802 provided additional details to finalize the FCA reform. Specifically, the June 12, 2019 *Order* approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these Rules.
- A procedural schedule, as shown in Appendix A of the *Order*.
- A threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.

- Tracking under or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.
- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019 [joint comments](#)⁴ in Docket No. E999/CI-03-802 and the requirement that the annual true-up filings include a complete analysis and discussion of the consequences of self-commitment and self-scheduling of their generators, including the annual difference between production costs and corresponding prevailing market prices.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019 joint comments⁵ in Docket No. E999/CI-03-802.

The instant Petition provides the true-up between the Company's actual fuel/purchased power cost recovery through its FPE and the actual corresponding fuel/purchased power costs incurred by Minnesota Power for the period of January 1 – December 31, 2021.

B. PURPOSE OF MINNESOTA POWER'S PETITION

In its Petition, Minnesota Power: (1) demonstrated the Company's fuel/purchased power costs for 2021 were reasonable and prudent⁶, (2) requested Commission approval to use the Significant Unforeseen Impact clause to begin collection of the Company's 2021 FCA true-up charge of \$56.3 million⁷, to be applied to sales subject to the FCA over the period of April 2022 through August 2023,⁸ and (3) requested Commission approval of the FCA true-up compliance reporting required by Minnesota Rules 7825.2800 – 7825.2840 and applicable Commission order⁹s. The Department discusses each of these three areas in the following sections.

On July 30, 2021, Minnesota Power [petitioned](#) the Commission for Approval of the Annual Forecasted Rates for its Rider for Fuel and Purchased Energy Charge related to Docket Nos. E015/AA-19-302 and E015/AA-20-463. In its July 30, 2021 Petition, Minnesota Power provided an update to the 2021 fuel clause adjustment forecast related to two significant unforeseen weather- related outages which impacted the Company's HVDC Transmission Line. After a 30-day notice period, no party objected to

⁴ In the March 1, 2019 joint comments, Attachment 1 corresponds to Minnesota Power.

⁵ In the March 1, 2019 joint comments, Attachment 4 corresponds to Minnesota Power and reflects the Company's current FPE Rate Schedule as approved by the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.

⁶ Petition, pp. 4 – 8.

⁷ Petition, pp. 2-3 states, "During 2021, Minnesota Power under collected fuel costs by \$55.8 million and over refunded 2020 fuel costs by approximately \$500,000 due to higher than forecasted sales during September 2021 through December 2021 refund time period."

⁸ Petition, p. 7. The Company is requesting collection of a 17 month period to reduce the impact on customers compared to normal 12 month recovery period.

⁹ Petition, pp. 3-4.

the rate adjustment requested on July 30, 2021 and Minnesota Power increased the approved monthly fuel cost rates for September through December 2021 by \$8.4 million, in accordance with the Commission's [Order](#) dated June 12, 2019.¹⁰

C. PRUDENCY AND REASONABLENESS OF MINNESOTA POWER'S ACTUAL 2021 FUEL/PURCHASED POWER COSTS

Minnesota Power's actual 2021 fuel/purchased costs were significantly higher than the forecasted costs approved and used to set the corresponding FPE rates for 2021. As Minnesota Power noted in its Petition, actual 2021 fuel/purchased power costs were higher than forecasted primarily due to:

- **Sales** – Customer sales increased 12 percent over forecasted sales mainly due to increased industrial sales.¹¹ The increase in sales aids in offsetting the increase in actual costs compared to forecasted costs. The increase in fuel/purchases costs over forecasted costs was primarily due to an increase in Market prices and not due to the increase in Industrial sales.¹²

Another impact of higher than forecasted sales is related to Retail Loss of Load. Because customers nominated close to full production through 2021, and Minnesota Power forecasted sales to be lower, less sales were needed for Retail Loss of Load.¹³

Asset Based Margins were nearly \$3 million (36 percent) lower than forecasted. The decrease in credit was mainly due to Midcontinent Independent System Operator (MISO) Costs which were increased in 2021 due to higher market prices. A portion of MISO Costs are allocated to Asset Based sales on a per MWh basis and decreased the wholesale margin.¹⁴

- **Generation** – Minnesota Power saw an increase in generation during 2021. The higher energy production at Minnesota Power's thermal generation fleet is a result of increased customer sales, lower renewable production, and higher market prices. Minnesota's zero cost fuel resources saw a decrease of approximately 14 percent in generation due to lower-than-expected wind and extreme drought conditions.¹⁵

Lower generation increased Market Purchases, which were \$57.28 million higher than forecasted. Energy prices were up significantly, but in addition to increased prices, Minnesota Power purchased more than forecasted because hydro and wind generation and wind purchases were below forecasted amounts.¹⁶

¹⁰ Petition, p. 1.

¹¹ Petition, p. 5.

¹² Department Attachment 1.

¹³ Petition, Attachment No. 2, p. 33.

¹⁴ Petition, Attachment No. 2, p. 33.

¹⁵ Petition, p. 6.

¹⁶ Department Attachment 2.

Minnesota Power forecasted **[TRADE SECRET DATA HAS BEEN EXCISED]** purchases from NextEra Energy with actual market purchases reported from NextEra Energy of **[TRADE SECRET DATA HAS BEEN EXCISED]**.¹⁷ In response to the Department's Information Request No. 4¹⁸, the Company attributed the difference between the forecast and actual purchased energy from NextEra Energy to several different factors:

- A portion of the NextEra Energy purchases were for non-firm retail customers, which were included in the forecast under the "Purchase to Serve Non-Firm Retail Customer."
 - A portion of the NextEra Energy purchases were to cover Minnesota's Green Pricing program (Renewable Source).
 - A large portion of purchased power from NextEra Energy related to Minnesota Power's need to purchase more from the market during coal conservation efforts from October 2021 through December 2021.
- **MISO Charges and Market Prices** – Power markets experienced major price volatility due to extreme weather events. Concerns over coal supply and the global energy crunch resulted in a significant increase in both natural gas and power market prices. Natural gas prices increased approximately 95 percent in 2021 compared to 2020 and power prices increased by about 120 percent in 2021 compared to 2020.¹⁹

Minnesota Power reported significantly higher MISO charges for congestion, Financial Transmission Rights (FTRs), and Auction Revenue Rights (ARRs) in 2021. In response to Department Information Request No. 5, the Company stated:

Significantly higher LMPs [Locational Marginal Price] within the region was the driver of the increased MISO charges, which includes the congestion and losses between MP's [Minnesota Power] energy resources and load. A portion of those costs were offset by revenue MP received from MISO through FTRs and ARRs.²⁰

Minnesota Power expects elevated LMPs for 2022 and 2023, similar to levels experienced during 2021, which will continue to impact congestion and loss separation.²¹

With respect to MISO and the Organization of MISO States (OMS) reviewing FTR and AAR underfunding concerns, the Department asked Minnesota Power what it is doing to manage its exposure of congestion costs. Minnesota Power stated:

¹⁷ Petition, Attachment No. 2, p. 10.

¹⁸ Department Attachment No. 2.

¹⁹ Petition, p. 7.

²⁰ Department Attachment 3, p. 1.

²¹ Department Attachment 3.

Minnesota Power participates in the Reserved Resource Point (RSP) process in an effort to align ARR along generation to load paths that pose the most significant congestion cost risk. In addition to the RSP process, Minnesota Power also participates in the annual ARR Allocation, the Annual FTR Auction, and the Multi-Period Monthly FTR Auctions. During Q4, 2021, Minnesota Power voted in favor of MISO forming an FTR TCM Task Force, and agrees that the underfunding issue is significant within the MISO footprint particularly given the strong transformation to cleaner energy within Minnesota.²²

The following table summarizes and compares select energy sales and cost data relevant to Minnesota Power's 2021 FCA true-up:

Table 1: Comparison of Select Forecasted to Actual Data for Minnesota Power's 2021 Fuel Clause Adjustment True-up²³

Data Description	2021 Forecast (A)	2021 Actual (B)	Percentage Difference (B-A)/A
MWh Sales Subject to FPE	8,187,964	9,194,640	12.29%
Total Cost of Fuel/Purchased Power	216,381,920	318,005,657	46.96%
Average Fuel/Purchased Power Cost per MWh	26.42	34.59	30.92%

Table 1 shows Minnesota Power's relevant 2021 MWh sales were approximately 12 percent greater than forecasted and the Company's total system actual fuel/purchased power costs recoverable through the FPE for 2021 were about 47 percent more than the forecasted 2021 costs. Table 1 also shows the average fuel and purchase power costs were about 31 percent higher than forecasted on a per MWh basis.

The cost and offsetting credit/revenue components of the Company's actual and forecasted 2021 fuel/purchased power costs recoverable through the FPE can be broken into several major categories, as summarized in the following table:

²² Department Attachment 3.

²³ Data in Table 1 retrieved from Tables 1 and 2 on pp. 4 – 5 of Petition.

Table 2: Minnesota Power's Forecasted and Actual 2021 Fuel/Purchased Power Costs and Offsetting Credits/Revenues by Major Category²⁴

Fuel/Purchased Power Cost, Credit, or Revenue Category	2021 Initial Forecast (A)	2021 Revised 7/30/2021 (B)	2021 Actual (C)	Percentage Difference (C-A)/A
Plant Generation Costs	95,021,916	95,021,916	111,316,949	17.15%
Plus: Purchased Power Costs	223,688,549	223,688,549	302,780,486	35.36%
Plus: MISO Charges	24,860,016	24,860,016	64,223,807	158.34%
Less: MISO Schedule 16, 17, & 24	(214,567)	(214,567)	(79,627)	-62.89%
Less: Fuel Cost Recovered through Inter System Sales	127,835,782	127,835,782	160,780,204	25.77%
Less: Costs Related to Solar	-	-	1,366	N/A
Plus: Time of Generation and Solar Energy Adjustment	432,654	432,654	386,358	-10.70%
Significant Events Filing - HVDC ²⁵ Costs	-	8,423,738	-	N/A
Total Cost of Fuel	216,381,920	224,805,658	318,005,657	46.96%
Total FPE or FCA Sales (MWh)	8,188	8,188	9,195	12.30%
Average Cost of Fuel	26.42	27.46	34.59	30.87%

Table 2 shows Minnesota Power's actual 2021 plant generation and purchased power costs, the two largest components of the total net fuel/purchased costs, were substantially greater than forecasted. Minnesota Power provided data in its Petition showing the average MISO market price was **[TRADE SECRET DATA HAS BEEN EXCISED]** than forecasted.²⁶ The higher energy market prices combined with higher sales caused higher general and purchased power costs for 2021.

Table 2 also shows MISO charges were significantly greater than forecasted (\$64 million actual compared to \$24.8 million forecasted, or 158 percent higher).

Minnesota Power explained that customer sales increased by approximately 1,006,676 MWhs or 12 percent over forecasted sales mainly due to increased industrial sales, which were close to full production.²⁷ Inter system sales also increased by 485,759 MWhs mainly due to increased MISO market sales, liquidated sales, and customer sales. However, inter system sales and related costs are removed from the Total Sales of Electricity as they are non-FCA MWhs. Minnesota Power's 2021 forecast assumed customers would nominate lower due to the pandemic, but actual 2021 nominations were closer to full production, and, therefore, less sales were needed for Retail Loss of Load.²⁸

²⁴ Data in Table 2 retrieved from Table 1 on p. 4 in Petition.

²⁵ High Voltage Direct Current (HVDC) Transmission Line, Petition, p. 1.

²⁶ Petition, p. 7 on Table 4.

²⁷ Petition, p. 5.

²⁸ Petition, p. 6.

**Table 3: Minnesota Power Sales Reconciliation Difference
between Forecasted and Actual 2021 Sales²⁹**

2021 Sales (MWh)	Forecasted Sales	Actual Sales	Difference
Residential	1,034,896	1,043,665	8,769
Commercial	1,121,024	1,174,413	53,389
Industrial	4,592,122	5,542,593	950,471
Lighting	12,106	10,445	(1,661)
Municipal Pumping	45,550	47,423	1,873
Municipals	1,398,623	1,393,315	(5,308)
Inter System Sales	4,869,313	5,355,063	485,749
Total Sales of Electricity	13,073,637	14,566,917	1,493,283
Customer intersystem Sales	764,396	1,067,722	303,326
Market Sales	2,236,937	3,412,055	1,175,118
Station Service	7,885	6,126	(1,759)
Sales due to Retail and Resale Loss of Load	1,860,096	869,160	(990,936)
Less: Inter System Sales	4,869,313	5,355,063	485,749
Less: Solar Generation & Purchases	16,357	17,215	858
Total Fuel Clause Sales	8,187,964	9,194,640	1,006,676

The Department notes the Petition Attachment No. 3 on page 41 shows a \$0.95 million increase in energy losses and a \$38.39 million increase in energy congestion costs, which appear to be largely a result of Minnesota Power purchasing more day-ahead asset energy MWhs.

Minnesota Power experienced higher sales than forecasted, but also higher MISO Charges, plant generation costs, and purchased power costs in 2021. Total cost of fuel was nearly 47 percent higher than forecasted in 2021³⁰. Based on Minnesota Power's actual experience in 2021, the Department concludes it is reasonable the Company's actual 2021 fuel/purchased costs recoverable through the FCA were more than those forecasted. The Department notes that most of the reasons for increased fuel costs, including lower renewable production, higher gas and energy market prices, and higher MISO charges, were mostly beyond Minnesota Power's control, although continued cost controls and efficiency are important to keep fuel costs reasonable. The Department recommends the Commission find Minnesota Power's actual 2021 fuel/purchased power costs recoverable through the FCA were reasonable.

²⁹ Data in Table 3 retrieved from Table 2, on p. 5 of Petition.

³⁰ Instant comments, Table 2.

D. MINNESOTA POWER'S 2021 FUEL CLAUSE ADJUSTMENT TRUE-UP

Minnesota Power requests the use of the Significant Unforeseen Impact clause to begin collecting the proposed 2021 FCA true-up starting April 1, 2022. The Commission's December 19, 2017 [Order](#) in Docket No. E999/CI-03-802 states, "The Commission will set recovery of the utility's fuel, power purchase agreement, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a **significant unforeseen impact**" [Emphasis Added]. The Commission's June 12, 2019 [Order](#) in Docket No. E999/CI-03/802 states:

The Commission adopts threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant unforeseen impact that may justify an adjustment to the approved fuel rates. The Electric utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.

In its Petition, Minnesota Power requests recovery of \$56.3 million in FCA under collections. The Company stated it under collected 2021 fuel costs by \$55.8 million and also over refunded 2020 fuel costs by approximately \$500,000.³¹

Table 4: Over/(Under) Collection Calculation³²

2021 Actual Collections from Customers	214,366,713
Less: Actual Costs and Actual Sales	270,204,980
Remaining Under Collection	(55,838,267)
2020 Over Refunded Amount	(525,128)
Net 2021 FCA True-up Amount	(56,363,395)

In its Petition, Minnesota Power requests to collect the \$56,363,395 under collection from customers effective April 2022 through August 2023.

Minnesota Power's March 1, 2022 filing included the proposed true-up rates for April 2022 through December 2022 as follows:

³¹ DOC Attachment 1, response to DOC IR No. 1, explains the Company's 2020 Over Refunded Amount calculated as \$4,186,598 amount actually refunded to customer less the amount for 2020 over-collected and estimated to be refunded based on forecasted sales of \$3,661,470 for an over refund of \$525,128.

³² Data retrieved from Petition, Attachment No. 2, p. 2 and p. 26.

Table 5: Customer Rate Impact – 17 month Spread³³

¢/kWh	2022 Forecasted Rates	2021 True- up Rates	Net Rate Impact
Apr-2022	2.505	0.487	2.992
May-2022	2.470	0.480	2.950
Jun-2022	2.584	0.480	3.064
Jul-2022	2.953	0.446	3.399
Aug-2022	2.749	0.457	3.206
Sep-2022	2.527	0.472	2.999
Oct-2022	2.565	0.465	3.030
Nov-2022	2.436	0.451	2.887
Dec-2022	2.525	0.414	2.940

Minnesota Power will align forecasted sales with its approved 2023 forecast, once approved. Minnesota Power estimates the proposed 2021 FCA True-Up will be approximately \$3.50 per month for the average residential customer.³⁴

Minnesota Power's April 1, 2022 correction included updated proposed true-up rates for May 2022 through December 2022. Because no objections were filed during the 30-day notice period of its March 1, 2022 filing, Minnesota Power began collecting the 2021 FCA True-up on April 1, 2022. Minnesota Power also filed a correction to its March 1, 2022 filing on April 1, 2022. The correction explained the Company discovered an error in the 2022 Rate Impact spreadsheet and as a result, Minnesota Power revised its proposed 2021 FCA True-up beginning May 2022. The following tables compare the Company's initial proposal to the Company's corrected proposal.³⁵

³³ Petition, p. 8.

³⁴ Petition, p. 8.

³⁵ Corrected Filing, pp. 1-2.

Table 6: 2021 True-up Rates, Initial Filing and Corrected Filing

¢/kWh	Initial 2021 True-up Rates ³⁶	Corrected 2021 True-up Rates ³⁷
Apr-2022	0.487	0.487
May-2022	0.480	0.571
Jun-2022	0.480	0.575
Jul-2022	0.446	0.543
Aug-2022	0.457	0.554
Sep-2022	0.472	0.565
Oct-2022	0.465	0.565
Nov-2022	0.451	0.550
Dec-2022	0.414	0.505

Table 7: Net Rate Impact, Initial Filing and Corrected Filing

¢/kWh	Initial Net Rate Impact ³⁸	Corrected Net Rate Impact ³⁹	Difference in Net Rate Impact ⁴⁰
Apr-2022	2.992	2.992	-
May-2022	2.950	3.041	0.091
Jun-2022	3.064	3.159	0.095
Jul-2022	3.399	3.496	0.097
Aug-2022	3.206	3.303	0.097
Sep-2022	2.999	3.092	0.093
Oct-2022	3.030	3.130	0.100
Nov-2022	2.887	2.986	0.099
Dec-2022	2.940	3.030	0.090

The Department concludes Minnesota Power correctly calculated its 2021 FCA/FPE Rider under collection of \$56,363,395. The Department considers the Company's proposal to collect the amount from customers effective April 2022 through August 2023 reasonable. Minnesota Power will charge the rates for April 2022 through December 2022 as shown in Table 6 in the instant Comments. The

³⁶ Petition, p. 8

³⁷ Corrected filing, p. 1.

³⁸ Petition, p. 8

³⁹ Sum of FPE 2022 Forecasted Rate (¢/kWh) and FPE 2021 True-up Rate (¢/kWh) columns on Corrected filing, Attachment 2, p. 4.

⁴⁰ Calculation from Table 7 of instant comments, Corrected Net Rate Impact column less Initial Net Rate Impact column.

Company will provide an update for January 2023 through August 2023 rates once the Company has an approved 2023 forecast.⁴¹

E. COMPLIANCE WITH REPORTING REQUIREMENTS

The Department verified the instant Petition included the information required per the following:

- Minnesota Rules 7825.2800 – 7825.2840, as revised on pages 3 – 4 and approved in Point 1 of the Commission’s June 12, 2019 [Order](#) in Docket No. E999/CI-03-802.
 - Minnesota Power filed its Petition on March 1, 2022.
- Annual FCA true-up general reporting guidelines, as outlined on page 7 and approved in Point 5 of the Commission’s June 12, 2019 [Order](#) in Docket No. E999/CI-03-802.
 - Minnesota Power’s filing included a submittal letter.
 - Minnesota Power’s filing included comparison of 2021 forecast and 2021, including variances by month⁴² of the following:
 - retail fuel and purchased energy adjustment
 - sales for 2021
 - MISO costs
 - unit outage information
 - Minnesota Power’s filing included an explanation of why the forecasted rate differed from actual costs and why it is reasonable for ratepayers to pay more.⁴³
- Annual FCA true-up reporting compliance matrix specific to Minnesota Power as shown in Attachment 1 of the March 1, 2019 [joint comments](#) and approved in Point 7 of the Commission’s June 12, 2019 *Order* in Docket No. E999/CI-03-802.
 - Minnesota Power’s filing included:
 - Fuel & Energy Source Procurement and Energy Dispatching Policies, Attachment No. 11.
 - Independent Auditor’s Report, Attachment No. 1.
 - Annual Report of Automatic Adjustment Charges, Attachment No. 2.
 - Notice of Reports Availability, Attachment No. 12.
 - Monthly MISO Day 2 Charges and Allocation, Attachment No. 3.
 - Annual and Daily Ancillary Services Market Charges and Summary, Attachment No. 6.
 - Auction Revenue Rights (ARR) Process Information, Attachment No. 4
 - Generation Facilities Maintenance Expenses, Attachment No. 10
 - Report Addressing the PPA with Manitoba Hydro, Attachment No. 7

⁴¹ Petition, p. 8.

⁴² Petition, Attachment 2.

⁴³ Petition, p. 8.

- Offsetting Revenues and/or Compensation Received by Investor-Owned Utilities, Attachment No. 9
- Plant Outage Reporting, Attachment No. 5
- Wind Curtailment Reporting, Attachment No. 8

The Department performed a more detailed review of Minnesota Power's Generations Maintenance Expenses and correlation to incremental forced outage costs compliance filing, as discussed below.

1. *Maintenance Expenses of Generation Plants and Correlation to Incremental Forced Outage Costs (In the Matter of the Review of the 2005 AAA of Charges for all Electric Utilities, Docket No. E999/AA-06-1208)*

In its February 6, 2008 [Order](#) in Docket No. E999/AA-06-1208 (Order 06-1208), the Commission required all electric utilities subject to automatic adjustment filing requirements, except for Dakota Electric, to include in future annual automatic adjustment filings the actual expenses pertaining to maintenance of generation plants, with a comparison to the generation maintenance budget from the utility's most recent rate case.

This requirement stems from the drastic increase in investor-owned utilities (IOUs) outage costs during FYE06 and FYE07. When a plant experiences a forced outage, the utility must replace the megawatt hours the plant would have produced if it had been operating, usually through wholesale market purchases. The cost of those market purchases flows through the FCA directly to ratepayers. The high outage costs incurred by investor-owned utilities in fiscal years 2006 and 2007 raised questions as to whether the utilities were (1) maintaining plants appropriately to prevent forced outages, and (2) spending as much on plant maintenance as they were charging to their customers in base rates. The Commission agreed with the Department and the Large Power Intervenors that "utilities have a duty to minimize unplanned facility outages through adequate maintenance and to minimize the costs of scheduled outages through careful planning, prudent timing, and efficient completion of schedule work" (Order 06-1208, p. 5).

The Department summarizes Minnesota Power's maintenance spending below. As stated in the Department's FYE18 and FYE19 analysis, Minnesota Power is spending less on maintenance of their generation facilities than the \$42.0 million approved in its most recent rate case. The Company spent \$29.6 million in 2019, \$30.3 million in 2020⁴⁴ and \$36.1 million in 2021⁴⁵.

⁴⁴ Minnesota Power's actual generation maintenance expense was \$29.6 million for 2019 and \$30.3 million for 2020. See Docket No. E015/AA-19-302.

⁴⁵ Attachment No. 10, p. 2 in the Petition.

**Table 8: Comparison of Generation Maintenance
Expense for Minnesota Power (\$ millions)**

Test Year⁴⁶	Approved Rate Case Amount	Actual 2018- 2021 Average	Difference
2017	\$42.0	\$32.0	-23.81%

Because (1) the amount of generation maintenance expense is linked to a utility's forced outages, (2) utilities have an incentive to minimize generation maintenance expense between rate cases, and (3) utilities do not have a strong incentive to minimize the replacement power costs for which they receive flow through recovery, the Department intends to continue to monitor the IOUs' actual expenses pertaining to maintenance of generation plants, with a comparison to the generation maintenance amount approved in Minnesota Power's most recent rate cases in future FCA true-up filings.

The Department notes Minnesota Power's average maintenance spending for 2019 to 2021 was \$32.0 million, or 23.81 percent lower than the \$42.0 million provided in Minnesota Power's rates. As a result, the Department reviewed Minnesota Power's incremental forced outage costs for 2021 as reported on Minnesota Power's Attachment No. 5. Minnesota Power's incremental forced outage costs of \$9,799,512 were significantly higher than Minnesota Power's forecasted incremental forced outage costs of negative \$3,503,793 million, largely due to higher energy market prices and increased outage days. The Department reviewed Minnesota Power's explanations for plant outages as provided in Minnesota Power's Attachment 5, Plant Outages, and found Minnesota Power's explanations to be reasonable. As a result, the Department will accept Minnesota Power's forced outage costs for the 2021 true-up. However, the Department will carefully review Minnesota Power's generation maintenance expense level in the open general rate case and correlation to incremental forced outage costs in future FCA forecasts and true-up filings.

The Department concludes Minnesota Power's Petition complies with the applicable reporting requirements and recommends the Commission approve the compliance reporting portions of the Company's Petition.

III. CONCLUSIONS AND RECOMMENDATIONS

Based on our review, the Department concludes (1) Minnesota Power's actual fuel/purchased power costs for 2021 were reasonable and prudent, (2) Minnesota Power correctly calculated its 2021 FCA/FPE Rider under-collection of \$56,363,395, and (3) Minnesota Power's Petition complies with the applicable reporting requirements. Therefore, the Department recommends the Commission take the following actions:

⁴⁶ Most recent, finalized rate case is Docket No. E015/GR-16-664. Minnesota Power has an open rate case, Docket No. E015/GR-21-335.

- Find Minnesota Power's actual 2021 fuel/purchased power costs recoverable through the FCA/FPE rider were reasonable and prudent for 2021.
- Find Minnesota Power correctly calculated its 2021 FCA/FPE Rider under-collection of \$56,363,395.
- Allow Minnesota Power to collect \$56,363,395 from April 2022 through August 2023. Allow Minnesota Power to charge the rates for April 2022 through December 2022 as shown in Table 6 in the instant Comments. Require the Company to provide an update for rates from January 2023 through August 2023 once the Company has an approved 2023 forecast.
- Approve the compliance reporting portions of Minnesota Power's Petition.



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

Docket Number: E015/AA-20-463
Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 3/10/22
Response Due: 3/21/22

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

Assigned Analyst(s): Nancy Campbell & Holly Soderbeck

Email Address(es): nancy.campbell@state.mn.us & holly.soderbeck@state.mn.us

Phone Number(s): 651-539-1821 & 651-539-1849

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:	6
Topic:	Industrial Sales
Reference(s):	MP's Table 2, Sales Comparison

Request:

MP's Table 2 - Sales Comparison for 2021 shows Total Fuel Clause Sales were 1,006,676 MWhs higher than forecasted, and Industrial sales were the majority of the higher sales as a result of being 950,471 MWhs higher than forecasted.

- (a) Should Industrial Customers pay most of the 2021 FCA true-up since these customers were largely the reason for the higher FCA costs? Please explain your response.
- (b) Will the Industrial Customer pay for most of the 2021 FCA true-up based on the way MP will charge the 17-month 2021 true-up? Please explain your response.

Response:

- (a) The increase in FCA costs was primarily due to the increase in Market prices and was not due to the increase in Industrial Sales. The increased Market prices increased the cost to purchase energy from the MISO market and increased MISO charges for 2021. Please refer to "Table 4: Average Market Price Comparison" on page 7 of Minnesota Power's 2021 Annual True Up Report and Rate Adjustment Proposal filed March 1, 2022 (AA-20-463) for a comparison of Average Market Prices between the 2021 forecast and 2021 actuals.
- (b) The 2021 FCA True Up will be a rate that is applied to customer firm usage in 2022 and 2023 so Industrial customers will pay their appropriate share of the 2021 FCA True Up based on their firm energy usage and E8760 energy allocator.

To be completed by responder

Response Date: 3/21/2022
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: 218-355-3678



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

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ADDITIONAL INSTRUCTIONS:

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Request Number:	4
Topic:	Purchase Power - Market
Reference(s):	MP's Attachment 2, Page 10 of 34

Request:

MP's Total Purchase Power actual 2021 costs were \$79.092 million higher than forecasted. The majority of the higher Purchase Power costs was in the Purchase Power – Market Categories. Please address the two questions regarding Purchase Power – Market costs:

- (a) Please explain why “Market Purchases” were \$57.28 million higher than forecasted and why this cost is reasonable to charge ratepayers through the 2021 FCA true-up?
- (b) Please explain why “NextEra Energy” was forecasted to be \$0 but MP bought purchase power that cost \$23.297 million for 2021? Please explain why this is reasonable to charge ratepayers through the 2022 FCA true-up?

Response:

- (a) One of the reasons that Market Purchase were \$57.28 million higher than forecasted is due to Energy prices being up 120 percent in 2021 compared to 2020. Please refer to “Table 4: Average Market Price Comparison” on page 7 of Minnesota Power’s 2021 Annual True Up Report and Rate Adjustment Proposal filed March 1, 2022 (AA-20-463) for a comparison of Average Market Prices between the 2021 forecast and 2021 actuals. Minnesota Power forecasted Market Prices to be \$23.80 in 2021 but actuals came in \$17.36 higher. This higher average market price increased in cost of Minnesota Power’s market purchases throughout 2021.

To be completed by responder

Response Date: 3/21/2022
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: 218-355-3678



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Another factor for the increase in purchases was Minnesota Power saw actual hydro generation, wind generation, and wind purchases come in below forecast for 2021. This decrease in renewable generation and purchases resulted in more purchases from the market to cover load.

These costs are reasonable to charge ratepayers as they are prudent costs related to serving customer loads and with a 120 percent increase in market prices, the increased purchases cost more than forecasted.

- (b) NextEra Energy ("NEPM") was forecasted to be \$0 because when the 2021 FAC Forecast was prepared, no purchases with NEPM had been executed. In the 2021 FAC Forecast, one of the placeholders we supply is a line labeled "Purchase to Serve Non-Firm Retail Customer." This is a placeholder as the purchases to serve these customers are not made until closer to the start of the year. The amount we had in the 2021 FAC Forecast was \$15,767,710 but when actuals are reported, they are lumped together in the individual counter party lines.

For 2021 actuals, the market purchases of \$23,297,299 from NEPM consisted of \$79,375 to cover Minnesota Power's Green Pricing Program (Renewable Source) and \$11,073,514.61 to serve the non-firm retail customer. These two amounts are removed from the total fuel costs through the intersystem sales section. A large portion of the \$12,144,509.38 that remained in purchased power for NEPM were due to the fact that more purchases from the market were needed during our coal conservation efforts from October 2021 through December 2021.

To be completed by responder

Response Date: 3/21/2022
Response by: Ryan LaCoursiere
Email Address: rlacoursiere@mnpower.com
Phone Number: 218-355-3678



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

Assigned Analyst(s): Nancy Campbell & Holly Soderbeck

Email Address(es): nancy.campbell@state.mn.us & holly.soderbeck@state.mn.us

Phone Number(s): 651-539-1821 & 651-539-1849

ADDITIONAL INSTRUCTIONS:

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Request Number:	5
Topic:	MISO Charges
Reference(s):	MP's Attachment 3, Page 41 of 45

Request:

For Congestion, FTRs & ARRs categories of MISO Charges for 2021, MP forecasted \$2.871 million in costs, but actual costs were \$41.266 million, for a \$38.395 million in higher costs for 2021.

- (a) Please explain all the reasons for why MISO charges for congestion, FTRs and ARRs were so high for 2021.
- (b) Does MP expect MISO charges for congestion, FTRs and ARRs to be an ongoing problem and continue at 2021 levels in 2022 and 2023, or does MP expect this to be limited to 2021? Please explain.
- (c) MISO and the Organization of MISO States (OMS) are looking at FTR and ARR underfunding and concerns with participants not managing their exposure to congestion costs. Please explain what is MP doing to manage their exposure to congestion costs?

Response:

- (a) Significantly higher LMPs within the region was the driver of the increased MISO charges, which includes the congestion and losses between MP's energy resources and load. A portion of those costs were offset by revenue MP received from MISO through FTRs and ARRs. MP does not receive enough revenue from the FTRs/ARRs to offset all congestion and loss costs, which is especially true for MP's newer wind assets where it's difficult to get FTRs through MISO's process. As LMPs increased in 2021,

To be completed by responder

Response Date: March 21, 2022
Response by: Nate Elling
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85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

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Requested From: Minnesota Power
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the price separation resulted in congestion and loss costs increasing as well. LMPs at the Minnesota Power load node increased at a higher rate than LMPs at Minnesota Power's energy sources, the increased price separation was seen most predominantly with Minnesota Power's wind portfolio. The unexpected increase in LMPs resulted in the increased congestion and loss costs in 2021.

- (b) Based on current forward natural gas and power prices, Minnesota Power expects to continue to see elevated LMPs for 2022 and 2023 that are consistent with where LMPs came in during 2021. The sustained higher LMPs will continue to be a problem for congestion and loss separation between gen and load nodes in 2022 and 2023. This can be impacted by changes in transmission and generation (outages, new build, etc.).
- (c) Minnesota Power participates in the Reserved Source Point (RSP) process in an effort to align ARRs along generation to load paths that pose the most significant congestion cost risk. In addition to the RSP process, Minnesota Power also participates in the annual ARR Allocation, the Annual FTR Auction, and the Multi-Period Monthly FTR Auctions. During Q4, 2021, Minnesota Power voted in favor of MISO forming an FTR TCM Task Force, and agrees that the underfunding issue is significant within the MISO footprint particularly given the strong transformation to cleaner energy within Minnesota.

As stated earlier, Minnesota Power does not receive sufficient revenue from MISO's current ARR/FTR allocation process to cover all congestion cost between generation and load. Minnesota Power anticipates this will continue to be an issue until MISO's FTR process goes through a redesign/update.

To be completed by responder

Response Date: March 21, 2022
Response by: Nate Elling
Email Address: nelling@mnpower.com
Phone Number: (218) 723-7494

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons 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
Public Comments**

Docket No. E015/AA-20-463

Dated this 14th day of April 2022

/s/Sharon Ferguson

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Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_20-463_AA-20-463
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_20-463_AA-20-463

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher J.	Oppitz	N/A	-	PO Box 910 Park Rapids, MN 56470-0910	Paper Service	No	OFF_SL_20-463_AA-20-463
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_20-463_AA-20-463
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_20-463_AA-20-463
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_20-463_AA-20-463
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-463_AA-20-463
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_20-463_AA-20-463
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_20-463_AA-20-463
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-463_AA-20-463
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_20-463_AA-20-463
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_20-463_AA-20-463

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Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_20-463_AA-20-463
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_20-463_AA-20-463
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_20-463_AA-20-463
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-463_AA-20-463
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_20-463_AA-20-463
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_20-463_AA-20-463
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-463_AA-20-463
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	No	OFF_SL_20-463_AA-20-463
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_20-463_AA-20-463

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Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_20-463_AA-20-463
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road Cloquet, Minnesota 55720	Electronic Service	No	OFF_SL_20-463_AA-20-463
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-463_AA-20-463
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_20-463_AA-20-463
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_20-463_AA-20-463
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_20-463_AA-20-463
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_20-463_AA-20-463
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_20-463_AA-20-463
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Paper Service	No	OFF_SL_20-463_AA-20-463
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-463_AA-20-463

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Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_20-463_AA-20-463
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_20-463_AA-20-463