

October 6, 2022

PUBLIC DOCUMENT

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

RE: **PUBLIC Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/AA-22-216

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) attached its **PUBLIC** response to reply comments of in the following matter:

Minnesota Power's Petition for Approval of the Annual Forecasted Fuel and Purchased Energy Rates for the Calendar Year 2023.

Hillary A. Creurer, Regulatory Compliance Administrator for Minnesota Power, filed the Petition on May 2, 2022 and filed Reply Comments on August 31, 2022.

The Department recommends the Minnesota Public Utilities Commission (Commission) **accept Minnesota Power's revised 2023 Fuel Forecast, with modifications.**

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ HOLLY SODERBECK
Financial Analyst

/s/ NANCY CAMPBELL
Financial Analyst Coordinator

HS/NC/ar
Attachment



Before the Minnesota Public Utilities Commission

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

Docket No. E015/AA-22-216

I. BACKGROUND

On May 2, 2022, Minnesota Power (the Company) filed its *Annual Forecasted Fuel and Purchased Energy Rates* ([Fuel Report](#)) for the calendar year 2023. Minnesota Power made its Fuel Report to comply with the decisions the Minnesota Public Utilities Commission (Commission) rendered in its June 12, 2019 [Order](#) in Docket No. E999/CI-03-802 and in compliance with [Minnesota Rules](#) 7825.2800 to 7825.2840 governing Automatic Adjustment of Charges.

On June 30, 2022, the Minnesota Department of Commerce (Department) filed [Comments](#), recommending the Commission accept Minnesota Power's filing, subject to a subsequent true-up, with one exception. The Department requested Minnesota Power provide additional information in Reply Comments regarding:

1. The 2023 forecast for planned and forced outage costs; and
2. An estimate of the planning resource auction revenues it expects to receive during its 2023 FCA forecast period which covers January 2023 through December 2023.

On August 31, 2022, the Company filed [Reply Comments](#), providing an updated to its 2023 fuel and purchased energy (FPE) forecast. The Company provided the following main reasons for an updated 2023 FPE forecast:

The main driver for the revised 2023 FPE forecast is due to continued higher Midcontinent Independent System Operation (MISO) market pricing and the associated impacts on congestion costs between Company generation and load. Minnesota Power also anticipates an increase in generation from Boswell Energy Center due to higher MISO marketing pricing.¹

The Company proposes updating its website with the proposed revised FPE Forecasted rates by December 1, 2022 and will update its website with any changes the Commission orders.²

The Company's Reply Comments also included the additional information the Department requested.

These Response to Reply Comments discuss the Company's updated 2023 FPE forecast and requested additional information.

¹ Company Reply Comments, p. 2.

² Company Reply Comments, p. 7.

II. COMPANY'S REPLY COMMENTS

1. Proposed Monthly FPE Forecasted Rates

Minnesota Power updated its 2023 FPE forecast, as the Department further discusses below. As a result of the updated forecast, the Company proposed to update the Company's website with the revised FPE Forecasted rates by December 1, 2022. Minnesota Power stated it will submit a compliance filing with a redlined and clean version of the Fuel and Purchased Energy Rider Tariff sheets upon Commission approval.³

2. 2023 Fuel and Purchased Energy (FPE) Forecast Update

Minnesota Power's forecasted FPE costs increased over 10% from \$265,752,178 in the original forecast to \$294,446,791 in the revised forecast.⁴ The following table provides a comparison between the original and revised forecasts.

Table 1: Forecasted Fuel Cost Summary⁵

| 2023 Forecasted Fuel | Original Forecast | Revised Forecast | Percent Change |
|--|--------------------------|-------------------------|-----------------------|
| Company's Generating Stations | \$148,359,504 | \$160,055,752 | 7.88% |
| Plus: Purchased Energy | \$224,480,219 | \$212,741,108 | -5.23% |
| Plus: MISO Charges | \$48,576,079 | \$84,170,517 | 73.28% |
| Less: MISO Schedules 16, 17, & 24 | (\$289,240) | (\$261,937) | -9.44% |
| Less: Fuel Cost Recovered through Inter System Sales | \$154,774,719 | \$161,604,379 | 4.41% |
| Less: Costs Related to Solar | \$2,522,315 | \$2,522,315 | 0.00% |
| Plus: Time of Generation and Solar Energy Adjustment | \$1,344,170 | \$1,344,170 | 0.00% |
| Total Cost of Fuel | \$265,752,178 | \$294,446,791 | 10.80% |
| Total Fuel Clause Sales (GWh) | 8,978.1 | 8,815.4 | -1.81% |
| Average Cost of Fuel (\$/kWh) | 2.961 | 3.349 | 13.10% |

MISO Charges increased over 73% in the Company's revised forecast when compared to the original forecast. Additionally, the Company's generating stations increased almost 8% in the revised forecast compared to the original forecast, although offset by the 5% decrease in purchased energy.

The Company provided the increased MISO Costs is mainly driven by changes in the Locational Margin Price (LMP) forecast, and market prices including associated impacts on congestion between the Company's generation and load. The Company provided the Auction Revenue Rights (ARR) credits increased, helping to reduce the increased LMP forecast. The Company uses the ARRs to mitigate MISO

³ Company Reply Comments, p. 7.

⁴ Company Reply Comments, p. 3, Table 1. (Revised Forecast \$294,446,791 - Original Forecast \$265,752,178) / Original Forecast \$265,752,178 = 10.8%.

⁵ Company Reply Comments, p. 3, Table 1.

costs for customers. The ARR credit increased from [TRADE SECRET DATA HAS BEEN EXCISED] in the Company's updated forecast.⁶

The company's average market price (LMP) forecast increased to [TRADE SECRET DATA HAS BEEN EXCISED] (\$/MWh) in the revised forecast, up from [TRADE SECRET DATA HAS BEEN EXCISED] (\$/MWh) in the original forecast, resulting in a [TRADE SECRET DATA HAS BEEN EXCISED].⁷

i. Sales Forecast

The Company's revised 2023 forecast also shows a decrease in forecasted total fuel clause sales. The increase in forecasted fuel costs discussed above and the slight decrease in forecasted fuel clause sales results in an overall increase in average cost of fuel of 13%. The Company's average cost of fuel in 2021 was 3.459 (¢/kWh) and the 2019-2021 average was 2.777 (¢/kWh).⁸ The following table compares the Company's original and revised sales forecasts.

Table 2: Sales Forecast Summary⁹

| 2023 Forecasted Sales (GWh) | Original Forecast | Revised Forecast | Percent Change |
|---|--------------------------|-------------------------|-----------------------|
| Total Sales of Electricity | 13,594,358 | 13,212,639 | -2.81% |
| Residential | 1,036,816 | 1,043,077 | 0.60% |
| Commercial | 1,195,779 | 1,232,760 | 3.09% |
| LP Taconite | 4,231,901 | 4,042,289 | -4.48% |
| LP Paper and Pulp | 600,104 | 600,104 | 0.00% |
| LP Pipeline | 309,481 | 309,481 | 0.00% |
| Other Misc. | 334,745 | 333,726 | -0.30% |
| Municipals | 1,326,588 | 1,311,330 | -1.15% |
| Inter System Sales | 4,558,944 | 4,339,872 | -4.81% |
| Less: Inter System Sales | 4,558,944 | 4,339,871 | -4.81% |
| Customer Intersystem Sales | 844,414 | 755,606 | -10.52% |
| Market Sales | 3,712,057 | 3,581,792 | -3.51% |
| Station Service | 2,473 | 2,473 | 0.00% |
| Sales due to Retail Loss of Load | - | - | |
| Less: Solar Generation & Purchases | 57,323 | 57,323 | 0.00% |
| Total Fuel Clause Sales | 8,978,091 | 8,815,445 | -1.81% |

The Company's total fuel clause sales decreased 1.81% in its revised forecast compared to the original forecast.

The Company provided the lowered forecast in LP Taconite sales reflects its current 2023 steel and taconite industry expectations. The Company stated, "Since the time MP filed its initial forecast in May 2022, U.S. hot rolled band steel prices have fallen 45%,"¹⁰ which resulted in U.S. steelmakers reducing

⁶ Department Attachment 1, Minnesota Power's response to Department Information Request No. 20.

⁷ Company Reply Comments, p. 4.

⁸ Department Comments, p. 8.

⁹ Company Reply Comments, p. 3.

¹⁰ Department Attachment 2, Minnesota Power's response to Department Information Request No. 21.

production. Also, Minnesota Power noted European steel capacity has also idled, limiting Minnesota taconite pellet producers' ability to market their excess capacity.¹¹

ii. Annual Auction Revenue Rights (ARR)

At the time of the Company's initial filing, the Annual ARR Allocation was not completed. The Company revised its annual allocation for January through December 2023 based on actual allocations from the most recent annual ARR Allocation for Planning Year 22/23. The following table provides a comparison of the original and revised 2023 Estimated Annual ARR Allocation. The Company's revised ARR forecast by source is in the top line of the row, and the Company's Original ARR forecast is in italics directly below in the same row, by source.

Table 3: 2023 Estimated Annual Allocation¹²

| | | Winter (Jan-Feb) | | Spring | | Summer | | Fall | | Winter (Dec) | |
|--|--------------------------------------|---------------------|-------------|------------|-------------|------------|-------------|------------|-------------|--------------|-------------|
| Source | Sink | On Peak | Off Peak | On Peak | Off Peak | On Peak | Off Peak | On Peak | Off Peak | On Peak | Off Peak |
| MHEB <i>Original forecast</i> | [TRADE SECRET DATA HAS BEEN EXCISED] | | | | | | | | | | |
| MP.BISON1 <i>Original forecast</i> | | | | | | | | | | | |
| MP.BLNCHR123 <i>Original forecast</i> | | | | | | | | | | | |
| MP.BOS233 <i>Original forecast</i> | | | | | | | | | | | |
| MP.MP_BOS4 <i>Original forecast</i> | | | | | | | | | | | |
| MP.HIBBAR4 <i>Original forecast</i> | | | | | | | | | | | |
| MP.HVDCE <i>Original forecast</i> | | | | | | | | | | | |
| MP.THOMSON <i>Original forecast</i> | | | | | | | | | | | |
| MP.FONDLA1 <i>Original forecast</i> | | | | | | | | | | | |
| MP.OLIVER12 <i>Original forecast</i> | | | | | | | | | | | |

¹¹ Department Attachment 2, Minnesota Power's response to Department Information Request No. 21.

¹² Company Reply Comments, Attachment 4, p. 2 for Revised Estimate and Petition, Attachment 4, p. 2 for Original Estimate.

In its original forecast, the Company estimated 2023 annual allocations based on actual allocations from the previous year.¹³ In its revised forecast, the Company provided 2023 estimated annual allocations based on actual allocations from the most recent annual ARR Allocation for Planning Year 22/23.¹⁴

iii. Outage Costs

The Company's revised 2023 FPE Forecast also included updates to its Outage costs. The Company **[TRADE SECRET DATA HAS BEEN EXCISED]** its planned outage for Boswell Unit 4 from **[TRADE SECRET DATA HAS BEEN EXCISED]**.¹⁵ The Company provided it extended the planned outage to accommodate replacement of all air heater baskets after a routine air heater inspection identified baskets that are beyond their normal expected life showing excessive wear or were broken.¹⁶

The Company also revised its equivalent unplanned outage factor from 7.2% to 7.55% for Boswell Unit 3 and from 6.8% to 8.39% for Boswell Unit 4.¹⁷

The Department reviewed the Company's revised Annual Forecast of Automatic Adjustment Charges for the period of January 2023 through December 2023 (2023 FPE). Based on the Department's review of Minnesota Power's reply comments and responses to Department information requests, we find Minnesota Power's revised forecast to be reasonable. The Department notes that all differences between forecasted and actual revenues and expenses are subject to true-up which will occur in Minnesota Power's 2023 true-up filing.

3. 2023 Forecast for Planned and Forced Outage Costs

In its Comments, the Department requested the Company address differences between forecasted and actual Planned Outage incremental costs for 2020 and 2021. The following table provides the forecasted and actual costs.

**Table 4: Comparison of Forecast and Actual
Planned Outage Incremental Costs¹⁸**

| Incremental Costs | 2020 | 2021 |
|--------------------------|-------------|---------------|
| Forecasted | \$3,441,487 | (\$2,869,832) |
| Actual | (\$293,246) | \$6,415,192 |
| Difference | \$3,734,733 | \$9,285,025 |

¹³ Petition, Attachment 4, p. 2.

¹⁴ Company Reply Comments, Attachment 4, p. 2.

¹⁵ Company Reply Comments, p. 5.

¹⁶ Department Attachment 3, Minnesota Power's response to Department Information Request No. 22.

¹⁷ Company Reply Comments, p. 5.

¹⁸ Department Comments, Table 9, p. 13.

In its Reply Comments, the Company stated, “The difference in the 2020 incremental costs is due to a major planned outage at Boswell Unit 4, which was originally planned for the spring of 2020, but was postponed until the spring of 2021.”¹⁹ The Company also noted decreased LMPs in 2020 due to the pandemic, which decreased the purchase price of replacement power. The average forecasted purchase price for 2020 was \$25.85 and actuals were \$18.03 per MWh.²⁰

The Company noted increases in LMP in 2021 compared to its forecast. The actual average purchase price during outages in 2021 was \$32.45, compared to the forecast of \$19.98 per MWh.²¹

The Department considers Minnesota Power’s response to be reasonable and does not have further questions at this time regarding the Company’s explanation regarding the difference between forecasted and actual planned outage incremental costs.

4. Planning Resource Auction Revenues, January 2023 through December 2023

In its Comments, the Department noted the importance of returning planning resource auction (PRA) revenues to ratepayers who pay for capacity costs (utilities’ plant costs and purchased capacity) through either base rates in rate cases or in FCAs.²² The Department requested the Company provide an estimate of PRA revenues and recalculated FCA/PRA rates the Company expects to receive during its 2023 FCA Forecast period, covering January 2023 through December 2023.

In its Reply Comments, the Company provided its original 2023 FPE Forecast included approximately \$3.8 million of PRA revenue from January through May 2023, resulting from known MISO PRA results. The Company stated Minnesota Power assumes no open capacity position from June through December 2023 and therefore, it did not include PRA revenue in its revised 2023 FPE Forecast. The Company provided its projected capacity position being close to zero at the time of filing. The Company stated:

After Minnesota Power prepared the FAC forecast update, submitted on August 31, 2022, FERC approved MISO’s seasonal resource adequacy construct proposal. Minnesota Power anticipates the actual capacity position will likely change again given the new seasonal construct and Seasonal Adjusted Capacity (SAC) methodology for thermal resources. Although Minnesota Power’s final position will not be known until the end of December at the earliest, Minnesota Power is seeing indications there will be changes to its capacity position.²³

¹⁹ Company Reply Comments, p. 6.

²⁰ Company Reply Comments, p. 6.

²¹ Company Reply Comments, p. 6.

²² Department Comments, p. 16.

²³ Department Attachment 4, Minnesota Power’s response to Department Information Request No. 23.

Given the difficulty in forecasting and the fact that Minnesota Power's capacity position is likely to change as is currently forecasted, the Department recommends the Commission require Minnesota Power to annualize its known PRA revenue for January through May 2023 and apply the result in its 2023 FPE Forecast. The monthly PRA revenue for January through May 2023 is \$0.76 million,²⁴ which results in an annualized PRA revenue for January through December 2023 of \$9.12 million.²⁵ As a result, the Department recommends a \$5.32 million (\$9.12 million less \$3.8 million) increase in PRA revenue for the 2023 FCA forecast. The Department notes the Company's available resources have not changed, and its overall sales forecast has decreased slightly, indicating the Company may be able to make similar capacity sales in the upcoming MISO capacity auction.

III. RECOMMENDATIONS

The Department recommends the Commission:

- Accept Minnesota Power's revised Annual Forecast of Automatic Adjustment Charges for the period of January 2023 through December 2023, provided an adjustment of \$5.32 million for annualized PRA revenue is included and subject to a subsequent true-up.
- Require Minnesota Power file a compliance filing with a redlined and clean version of the Fuel and Purchased Energy Rider Tariff sheet upon Commission approval.

The Department is available to answer any questions the Commission may have.

²⁴ \$3.8 million PRA Revenue for five months (Jan – May 2023) is an average monthly revenue of \$0.76 million.

²⁵ Average monthly revenue of \$0.76 million multiplied by 12 months is \$9.12 million.



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

Docket Number: E015/AA-22-216
Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 9/6/2022
Response Due: 9/16/2022

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

Assigned Analyst(s): Holly Soderbeck, Nancy Campbell

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

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

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: 20
Topic: Auction Revenue Rights/MISO Costs
Reference(s): Minnesota Power Reply Comments and Revised 2023 FPE Forecast Update

Request:

- A. Please explain and provide support for the Auction Revenue Rights (ARRs) increasing costs as discussed on page 4 in Sections C and D of the revised forecast.
- B. Please explain what the Company is doing to mitigate MISO Costs, including use of ARRs.

Responses:

- A. Minnesota Power inadvertently made it seem that ARR were a cause for an increase in MISO costs. As a whole Minnesota Power's MISO Costs are increasing mainly due to Locational Margin Price ("LMP") forecast; however, these LMP costs are off-set by the increase in ARR benefit. ARRs are used to help mitigate MISO costs for customers. The ARR values were updated to reflect the actual auction clearing values. As noted on Attachment 3 page 28, in the Congestion, FTRs & ARRs section, the ARR credit increased from [TRADE SECRET DATA BEGINS [REDACTED] TRADE SECRET DATA ENDS].
- B. Minnesota Power utilizes ARRs to help mitigate MISO costs for customers. The Company converts the majority of its ARR paths to FTRs through the Annual ARR/FTR nomination and allocation process so that they can be used in the daily markets. The conversion of ARRs to FTRs also allows Minnesota Power to help mitigate MISO costs as they fluctuate from month to month. In addition to the nomination and allocation process, Minnesota Power also participates in the Annual and Monthly FTR auctions in an effort to help mitigate MISO

To be completed by responder

Response Date: September 16, 2022
Response by: Nate Elling
Email Address: nelling@mnpower.com
Phone Number: (218) 723-7494



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

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costs on paths that MP does not have ARR on. Minnesota Power also actively participates in MISO's Reserved Source Point (RSP) process, where the attempt is made to better align existing ARRs on generation to load paths that MP has to serve load. Minnesota Power has participated and will continue to participate in the MISO ARR/FTR Stakeholder Engagement Sessions hosted by London Economics, which evaluates the strengths and weaknesses of the ARR/FTR process.

To be completed by responder

Response Date: September 16, 2022
Response by: Nate Elling
Email Address: nelling@mnpower.com
Phone Number: (218) 723-7494



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

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Date of Request: 9/6/2022
Response Due: 9/16/2022

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

Assigned Analyst(s): Holly Soderbeck, Nancy Campbell
Email Address(es): holly.soderbeck@state.mn.us, nancy.campbell@state.mn.us
Phone Number(s): 651-539-1849, 651-539-1821

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: 21
Topic: LP Taconite Forecasted Sales
Reference(s): Minnesota Power Reply Comments and Revised 2023 FPE Forecast Update

Request:

- A. Please explain and provide support for the decrease in forecasted sales for LP Taconite as shown in the Company's Table 2 in the revised forecast.

Responses:

MP lowered its forecasted LP Taconite sales to reflect its current 2023 steel and taconite industry expectations. Since the time MP filed its initial forecast in May 2022, U.S. hot rolled band steel prices have fallen 45%¹. In response to market conditions and lower prices U.S. steelmakers are reducing production, as evidenced by US Steel's recent announcement to temporarily idle its Gary #8 blast furnace² and steel capacity utilization decreasing from 81.7% for the week ending April 23, 2022 to 78.2%³ for the week ending September 10, 2022. Additionally, Minnesota taconite producers are subject to the volatility in the seaborne pellet market. Due to the decreased steel demand and rising energy costs in Europe, a significant portion of European steel capacity has been idled. This idled production will reduce opportunities for Minnesota taconite pellet producers to market their excess capacity.

¹ <http://steelbenchmarker.com/history.pdf>

² <https://investors.ussteel.com/news/news-details/2022/United-States-Steel-Corporation-Provides-Third-Quarter-2022-Guidance/default.aspx>

³ <https://www.steel.org/industry-data/>

To be completed by responder

Response Date: September 16, 2022
Response by: Tim Beddow
Email Address: tbeddow@mnpower.com
Phone Number: 218-355-3391



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

Docket Number: E015/AA-22-216
Requested From: Minnesota Power
Type of Inquiry: Financial

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Assigned Analyst(s): Holly Soderbeck, Nancy Campbell
Email Address(es): holly.soderbeck@state.mn.us, nancy.campbell@state.mn.us
Phone Number(s): 651-539-1849, 651-539-1821

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Request Number: 22
Topic: Planned outage for Boswell Unit 4
Reference(s): Minnesota Power Reply Comments and Revised 2023 FPE Forecast Update

Request:

- A. Please explain and provide support for the revised forecast for planned outage days for Boswell Unit 4 as discussed on page 4 in Section E.

Responses:

- A. The fall 2023 Boswell Unit 4 outage was originally planned for 18 days, however it was deemed necessary to extend the outage to 30 days to accommodate replacement of all air heater baskets. A routine spring 2022 air heater inspection identified there were baskets that were well beyond their normal expected life that either showed excessive wear or were broken. Therefore it was determined necessary to replace all four layers of the baskets in 2023 rather than one or two layers that are more typically replaced at a time. Given the labor intensive nature of this work, it is necessary to extend the duration of the outage to 30 days.

To be completed by responder

Response Date: September 16, 2022
Response by: Amanda Kluge
Email Address: akluge@mnpower.com
Phone Number: (218) 313-4412



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

Docket Number: E015/AA-22-216
Requested From: Minnesota Power
Type of Inquiry: Financial

☐ Nonpublic ☒ Public
Date of Request: 9/6/2022
Response Due: 9/16/2022

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

Assigned Analyst(s): Holly Soderbeck, Nancy Campbell
Email Address(es): holly.soderbeck@state.mn.us, nancy.campbell@state.mn.us
Phone Number(s): 651-539-1849, 651-539-1821

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: 23
Topic: PRA Revenue
Reference(s): Minnesota Power Reply Comments and Revised 2023 FPE Forecast Update

Request:

- A. Please explain and provide support for Minnesota Power's assumption that it will have no open capacity position from June through December 2023 as discussed on page 6 in Section B of the revised forecast.

Responses:

- A. For the updated FAC forecast Minnesota Power updated its capacity position based on its latest assumptions and also took into consideration the uncertainty with MISO's proposed seasonal construct. The projected capacity position results at the time of filing showed Minnesota Power's capacity position being close to zero.

After Minnesota Power prepared the FAC forecast update, submitted on August 31, 2022, FERC approved MISO's seasonal resource adequacy construct proposal. Minnesota Power anticipates the actual capacity position will likely change again given the new seasonal construct and Seasonal Adjusted Capacity (SAC) methodology for thermal resources. Although Minnesota Power's final position will not be known until the end of December at the earliest, Minnesota Power is seeing indications there will be changes to its capacity position. For example, at the September 6, 2022 Loss of Load Working Group meeting MISO presented preliminary seasonal Planning Reserve Margins (PRM), which showed a 25.5% PRM requirement for winter season (prior planning year PRM was 8.7%). Adjustments to Minnesota Power's capacity position and any capacity surplus revenue would be reflected in any future true-up filings for the 2023 Fuel Adjustment Clause if found to be material and exceeds the 5% threshold. As a note, any needed capacity purchase costs are not currently included in Minnesota Power's Fuel Adjustment Clause.

To be completed by responder

Response Date: September 16, 2022
Response by: Logan Foerst
Email Address: lfoerst@mnpower.com
Phone Number: (218) 355-3089

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 Response Comments**

Docket No. E015/AA-22-216

Dated this 6th day of **October 2022**

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|---------------------------------|--|---|--------------------|-------------------|------------------------|
| Kevin | Adams | kadams@caprw.org | Community Action Partnership of Ramsey & Washington Counties | 450 Syndicate St N Ste 35 Saint Paul, MN 55104 | Electronic Service | No | OFF_SL_22-216_Official |
| Jorge | Alonso | jorge.alonso@state.mn.us | Public Utilities Commission | 121 7th Place East Suite 350 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Lori | Andresen | info@sosbluewaters.org | Save Our Sky Blue Waters | P.O. Box 3661 Duluth, Minnesota 55803 | Electronic Service | No | OFF_SL_22-216_Official |
| Allen | Barr | allen.barr@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota St Ste 1400 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Jessica L | Bayles | Jessica.Bayles@stoel.com | Stoel Rives LLP | 1150 18th St NW Ste 325 Washington, DC 20036 | Electronic Service | No | OFF_SL_22-216_Official |
| Sara | Bergan | sebergan@stoel.com | Stoel Rives LLP | 33 South Sixth Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Kristin | Berkland | kristin.berkland@ag.state.mn.us | Office of the Attorney General-RUD | 445 Minnesota Street Bremer Tower, Suite 1400 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| David F. | Boehm | dboehm@bkllawfirm.com | Boehm, Kurtz & Lowry | 36 E 7th St Ste 1510 Cincinnati, OH 45202 | Electronic Service | No | OFF_SL_22-216_Official |
| Jason | Bonnett | jason.bonnett@state.mn.us | Public Utilities Commission | 121 East 7th Place suite 350 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Elizabeth | Brama | ebrama@taftlaw.com | Taft Stettinius & Hollister LLP | 2200 IDS Center 80 South 8th Street Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|-----------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Jon | Brekke | jbrekke@grenergy.com | Great River Energy | 12300 Elm Creek Boulevard Maple Grove, MN 553694718 | Electronic Service | No | OFF_SL_22-216_Official |
| Matthew | Brodin | mbrodin@allete.com | Minnesota Power Company | 30 West Superior St Duluth, MN 55802 | Electronic Service | Yes | OFF_SL_22-216_Official |
| Christina | Brusven | cbrusven@fredlaw.com | Fredrikson Byron | 200 S 6th St Ste 4000 Minneapolis, MN 554021425 | Electronic Service | No | OFF_SL_22-216_Official |
| Jennifer | Cady | jjcady@mnpower.com | Minnesota Power | 30 W Superior St Duluth, MN 55802 | Electronic Service | Yes | OFF_SL_22-216_Official |
| David | Cartella | David.Cartella@cliffsnr.com | Cliffs Natural Resources Inc. | 200 Public Square Ste 3300 Cleveland, OH 44114-2315 | Electronic Service | No | OFF_SL_22-216_Official |
| Greg | Chandler | greg.chandler@upm.com | UPM Blandin Paper | 115 SW First St Grand Rapids, MN 55744 | Electronic Service | No | OFF_SL_22-216_Official |
| Steve W. | Chriss | Stephen.chriss@walmart.com | Wal-Mart | 2001 SE 10th St. Bentonville, AR 72716-5530 | Electronic Service | No | OFF_SL_22-216_Official |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_22-216_Official |
| Riley | Conlin | riley.conlin@stoel.com | Stoel Rives LLP | 33 S. 6th Street Suite 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |
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|------------|----------------|---------------------------------|--|---|--------------------|-------------------|------------------------|
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| Sean | Copeland | seancopeland@fdlrez.com | Fond du Lac Band of Lake Superior Chippewa | 1720 Big Lake Rd Cloquet, MN 55720 | Electronic Service | No | OFF_SL_22-216_Official |
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| Brian | Edstrom | briane@cubminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota St Ste W1360 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Ron | Elwood | relwood@mnlisap.org | Legal Services Advocacy Project | 970 Raymond Avenue Suite G-40 Saint Paul, MN 55114 | Electronic Service | No | OFF_SL_22-216_Official |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|--------------|-----------------------------|---|--|--------------------|-------------------|------------------------|
| Catherine | Fair | catherine@energycents.org | Energy CENTS Coalition | 823 E 7th St St Paul, MN 55106 | Electronic Service | No | OFF_SL_22-216_Official |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_22-216_Official |
| Frank | Frederickson | ffrederickson@mnpower.com | Minnesota Power | 30 W Superior St. Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-216_Official |
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| Bruce | Gerhardson | bgerhardson@otpc.com | Otter Tail Power Company | PO Box 496 215 S Cascade St Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_22-216_Official |
| Barbara | Gervais | toftemn@boreal.org | Town of Tofte | P O Box 2293 7240 Tofte Park Road Tofte, MN 55615 | Electronic Service | No | OFF_SL_22-216_Official |
| Jerome | Hall | hallj@stlouiscountymn.gov | Saint Louis County Property Mgmt Dept | Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209 | Electronic Service | No | OFF_SL_22-216_Official |
| Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_22-216_Official |
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| James | Jarvi | N/A | Minnesota Ore Operations - U S Steel | P O Box 417 Mountain Iron, MN 55768 | Paper Service | No | OFF_SL_22-216_Official |
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| Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy Company, Inc. | 11 East Superior St Ste 125 Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-216_Official |

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| Annie | Levenson Falk | annief@cupminnesota.org | Citizens Utility Board of Minnesota | 332 Minnesota Street, Suite W1360 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| LeRoger | Lind | llind@yahoo.com | Save Lake Superior Association | P.O. Box 101 Two Harbors, MN 55616 | Electronic Service | No | OFF_SL_22-216_Official |

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| Eric | Lindberg | elindberg@mncenter.org | Minnesota Center for Environmental Advocacy | 1919 University Avenue West Suite 515 Saint Paul, MN 55104-3435 | Electronic Service | No | OFF_SL_22-216_Official |
| Eric | Lipman | eric.lipman@state.mn.us | Office of Administrative Hearings | PO Box 64620 St. Paul, MN 551640620 | Electronic Service | No | OFF_SL_22-216_Official |
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| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_22-216_Official |
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| Sarah | Manchester | sarah.manchester@sappi.com | Sappi North American | 255 State Street Floor 4 Boston, MA 02109-2617 | Electronic Service | No | OFF_SL_22-216_Official |
| Emily | Marshall | emarshall@mojlaw.com | Miller O'Brien Jensen, PA | 120 S. 6th Street Suite 2400 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Keith | Matzdorf | keith.matzdorf@sappi.com | Sappi Fine Paper North America | PO Box 511 2201 Avenue B Cloquet, MN 55720 | Electronic Service | No | OFF_SL_22-216_Official |

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| Daryl | Maxwell | dmaxwell@hydro.mb.ca | Manitoba Hydro | 360 Portage Ave FL 16 PO Box 815, Station Main Winnipeg, Manitoba R3C 2P4 Canada | Electronic Service | No | OFF_SL_22-216_Official |
| Matthew | McClincy | MMcClincy@usg.com | USG | 35 Arch Street Clouquet, MN 55720 | Electronic Service | No | OFF_SL_22-216_Official |
| Craig | McDonnell | Craig.McDonnell@state.mn.us | MN Pollution Control Agency | 520 Lafayette Road St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Natalie | McIntire | natalie.mcintire@gmail.com | Wind on the Wires | 570 Asbury St Ste 201 Saint Paul, MN 55104-1850 | Electronic Service | No | OFF_SL_22-216_Official |
| Joseph | Meyer | joseph.meyer@ag.state.mn.us | Office of the Attorney General-RUD | Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131 | Electronic Service | No | OFF_SL_22-216_Official |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | Yes | OFF_SL_22-216_Official |
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| James | Mortenson | james.mortenson@state.mn.us | Office of Administrative Hearings | PO BOX 64620 St. Paul, MN 55164-0620 | Electronic Service | No | OFF_SL_22-216_Official |
| Evan | Mulholland | emulholland@mncenter.org | Minnesota Center for Environmental Advocacy | 1919 University Ave W Ste 515 Saint Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
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| David | Niles | david.niles@avantenergy.com | Minnesota Municipal Power Agency | 220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Michael | Noble | noble@fresh-energy.org | Fresh Energy | 408 Saint Peter St Ste 350 Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_22-216_Official |
| Rolf | Nordstrom | rnordstrom@gpisd.net | Great Plains Institute | 2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229 | Electronic Service | No | OFF_SL_22-216_Official |
| M. William | O'Brien | bobrien@mojlaw.com | Miller O'Brien Jensen, P.A. | 120 S 6th St Ste 2400 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Christopher J. | Oppitz | N/A | - | PO Box 910 Park Rapids, MN 56470-0910 | Paper Service | No | OFF_SL_22-216_Official |
| Elanne | Palcich | epalcich@cpinternet.com | Save Our Sky Blue Waters | P.O. Box 3661 Duluth, MN 55803 | Electronic Service | No | OFF_SL_22-216_Official |
| Max | Peters | maxp@cohasset-mn.com | City of Cohasset | 305 NW First Ave Cohasset, MN 55721 | Electronic Service | No | OFF_SL_22-216_Official |
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| William | Phillips | wphillips@aarp.org | AARP | 30 E. 7th St Suite 1200 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Marcia | Podratz | mpodratz@mnpower.com | Minnesota Power | 30 W Superior S Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-216_Official |

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|----------------|--------------------------------|--------------------------------------|---|---|--------------------|-------------------|------------------------|
| Tolaver | Rapp | Tolaver.Rapp@cliffsnr.com | Cliffs Natural Resources | 200 Public Square Suite 3400 Cleveland, OH 441142318 | Electronic Service | No | OFF_SL_22-216_Official |
| 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_22-216_Official |
| 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_22-216_Official |
| Ralph | Riberich | rriberich@uss.com | United States Steel Corp | 600 Grant St Ste 2028 Pittsburgh, PA 15219 | Electronic Service | No | OFF_SL_22-216_Official |
| Buddy | Robinson | buddy@citizensfed.org | Minnesota Citizens Federation NE | 2110 W. 1st Street Duluth, MN 55806 | Electronic Service | No | OFF_SL_22-216_Official |
| Santi | Romani | N/A | United Taconite | PO Box 180 Eveleth, MN 55734 | Paper Service | No | OFF_SL_22-216_Official |
| Susan | Romans | sromans@allete.com | Minnesota Power | 30 West Superior Street Legal Dept Duluth, MN 55802 | Electronic Service | No | OFF_SL_22-216_Official |
| Richard | Savelkoul | rsavelkoul@martinsquires.com | Martin & Squires, P.A. | 332 Minnesota Street Ste W2750 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_22-216_Official |
| Thomas | Scharff | thomas.scharff@versoco.com | Verso Corp | 600 High Street Wisconsin Rapids, WI 54495 | Electronic Service | No | OFF_SL_22-216_Official |
| Peter | Scholtz | peter.scholtz@ag.state.mn.us | Office of the Attorney General-RUD | Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131 | Electronic Service | No | OFF_SL_22-216_Official |

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|------------|----------------|-----------------------------------|--|---|--------------------|-------------------|------------------------|
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| Christine | Schwartz | Regulatory.records@xcelenergy.com | Xcel Energy | 414 Nicollet Mall FL 7 Minneapolis, MN 554011993 | Electronic Service | No | OFF_SL_22-216_Official |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_22-216_Official |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | No | OFF_SL_22-216_Official |
| Doug | Shoemaker | dougs@charter.net | Minnesota Renewable Energy | 2928 5th Ave S Minneapolis, MN 55408 | Electronic Service | No | OFF_SL_22-216_Official |
| Brett | Skyles | Brett.Skyles@co.itasca.mn.us | Itasca County | 123 NE Fourth Street Grand Rapids, MN 557442600 | Electronic Service | No | OFF_SL_22-216_Official |
| 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_22-216_Official |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 150 S 5th St Ste 700 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_22-216_Official |
| Robert | Tammen | bobtammen@frontiernet.net | Wetland Action Group | PO Box 398 Soudan, MN 55782 | Electronic Service | No | OFF_SL_22-216_Official |

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|------------|-----------|--------------------------------|--|--|--------------------|-------------------|------------------------|
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| Kodi | Verhalen | kverhalen@taftlaw.com | Taft Stettinius & Hollister LLP | 80 S 8th St Ste 2200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_22-216_Official |
| Kevin | Walli | kwalli@fryberger.com | Fryberger, Buchanan, Smith & Frederick | 380 St. Peter St Ste 710 St. Paul, MN 55102 | Electronic Service | No | OFF_SL_22-216_Official |
| Laurie | Williams | laurie.williams@sierraclub.org | Sierra Club | Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202 | Electronic Service | No | OFF_SL_22-216_Official |
| Scott | Zahorik | scott.zahorik@aeoa.org | Arrowhead Economic Opportunity Agency | 702 S. 3rd Avenue Virginia, MN 55792 | Electronic Service | No | OFF_SL_22-216_Official |