

October 10, 2022

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## **VIA E-FILING**

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

RE: In the Matter of Minnesota Power's Petition for Approval of the Annual Forecasted Rates for its Rider for Fuel and Purchased Energy Charge PUC Docket No. E015/AA-22-216

Dear Mr. Seuffert:

The Large Power Intervenors ("LPI")<sup>1</sup> respectfully submit this letter comment in response to the notice of extended reply comment period issued by the Minnesota Public Utilities Commission ("Commission") in the above-titled matter.<sup>2</sup> LPI has reviewed and would like to thank the Minnesota Department of Commerce, Division of Energy Resources ("Department") and Minnesota Power for the thoughtful comments to date. After review, LPI supports the Department's recommendation that Minnesota Power's 2023 Annual Forecast of Automatic Adjustment Charges include a \$5.32 million adjustment to reflect annualized planning resource auction ("PRA") revenues.<sup>3</sup>

As of August 31, 2022, Minnesota Power's forecasted total cost of fuel increased from the initially projected \$265.7 million to \$294.5 million.<sup>4</sup> While the Department appears to largely agree with Minnesota Power's updated forecast,<sup>5</sup> the Department noted the importance of returning PRA revenues to ratepayers as a means to provide immediate ratepayer relief.<sup>6</sup> On this

LPI is an *ad hoc* consortium of Large Power ("LP") and Large Light & Power ("LLP") customers on Minnesota Power's system consisting for purposes of this filing of Blandin Paper Company; Boise White Paper, a Packaging Corporation of America company, formerly known as Boise, Inc.; Cleveland-Cliffs Minorca Mine, Inc.; Enbridge Energy Limited Partnership; Gerdau Ameristeel US Inc.; Hibbing Taconite Company; Northern Foundry, LLC; Sappi Cloquet, LLC; USG Interiors, Inc.; United States Steel Corporation (Keetac and Minntac Mines); and United Taconite, LLC.

<sup>&</sup>lt;sup>2</sup> Notice of Extended Reply Comment (July 28, 2022) (eDocket No. 202210-189596-02).

Response to Reply Comment by the Department at 7 (Oct. 6, 2022) (eDocket No. 202210-189596-02) ("Department Response").

Reply Comments by Minnesota Power at 1-2 (Aug. 31, 2022) (eDocket No. 20228-188728-01) ("MP Reply").

Department Response at 7.

<sup>6</sup> Initial Comment by the Department at 16 (June 30, 2022) (eDocket No. 20226-187096-02).

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point, the Company confirmed that it included a \$3.8 million adjustment in its updated 2023 forecast; however, this only accounted for anticipated PRA revenue from January through May 2023.<sup>7</sup> To account for a complete 2023 forecast, the Department recommended a fully annualized reduction of \$5.32 million for PRA revenues.<sup>8</sup>

Given that ratepayers are now forecasted to pay higher costs through the automatic adjustment process and are also facing the prospect of increased base rates as a result of Minnesota Power's pending rate case,<sup>9</sup> mitigating the impact of the 2023 FPE rates is in the best interest of ratepayers. LPI, therefore, supports the Department's proposed \$5.32 million reduction to account for annualized PRA revenues.

By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

Stoel Rives LLP

s/Riley A. Conlin

Riley A. Conlin

RAC:cal Enclosures

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MP Reply at 5.

<sup>8</sup> Department Response at 7.

<sup>&</sup>lt;sup>9</sup> See PUC Docket No. E015/GR-21-335.

## **CERTIFICATE OF SERVICE**

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s) to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

## RESPONSE TO REPLY LETTER COMMENT SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS

In the Matter of Minnesota Power's Petition for Approval of the Annual Forecasted Rates for its Rider for Fuel and Purchased Energy Charge
PUC Docket No. E015/AA-22-216

Dated this	10th day	of October,	2022.
/s/ Carmel	Laney		

Carmel Laney

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