



April 17, 2023

Andrew P. Moratzka
33 S Sixth Street, Suite 4200
Minneapolis, MN 55402
D. 612.373.8822
andrew.moratzka@stoel.com

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. E-015/AA-21-312**

Dear Mr. Seuffert:

The Large Power Intervenors ("LPI")¹ submit this letter comment² in response to Minnesota Power's annual true-up report for 2022, filed on March 1, 2023, in the above-titled docket.³ As it pertains to fuel and purchased energy ("FCA" or "FCA Adjustment") costs in 2022, the Company previously requested a \$36 million increase in fuel and purchased energy costs during the second half of 2022.⁴ The Company now seeks an additional \$13.3 million for under-recovered FCA costs, which it proposes collecting over a 12-month period.⁵ The Company primarily attributes the increased prices to "higher than forecasted" market prices, and combined these increases result in the average cost of fuel increasing from \$30.25 per MWh to \$31.91 per MWh.⁶

¹ LPI is an *ad hoc* consortium of industrial Large Power and Large Light & Power customers on Minnesota Power's (or the "Company") 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; United States Steel Corporation (Keetac and Minntac Mines); United Taconite, LLC; and USG Interiors, Inc.

² *In the Matter of an Investigation into the Appropriateness of Continuing to Permit Electric Energy Cost Adjustments*, PUC Docket No. E-999/CI-03-802, Order Approving Additional Details of New Fuel Clause Adjustment Process at Appendix A, A-2 (June 12, 2019) ("Scheduling Order"). The Scheduling Order contemplates initial comments by consumer advocates on April 15, 2023. Minn. R. 7829.0300, however, clarifies that if a deadline falls on a Saturday or Sunday, that day(s) is omitted from deadline computation. Therefore, LPI timely submits this initial comment on April 17, 2023. *See also* Minn. R. Civ. P. 6.01(a)(3)(C).

³ Compliance Filing by Minnesota Power (Mar. 1, 2023) (eDocket No. 20233-193558-01) ("2022 Report").

⁴ 2022 Report at 1.

⁵ *Id.* at 1-2.

⁶ *Id.* at 4.

It is well established under Minnesota law that customers are entitled to “just and reasonable” rates pursuant to Minn. Stat. § 216B.03. It is also the energy policy of the state that “retail electricity rates for each customer class be at least five percent below the national average.”⁷ Finally, it is also the state’s policy to “ensure competitive electric rates for energy-intensive trade-exposed customers.”⁸ When assessing the reasonableness of costs, the Minnesota Public Utilities Commission (“Commission”) must determine whether the Company has (a) demonstrated the amount of given costs as a judicial fact;⁹ and (b) established that it is just and reasonable for ratepayers (as opposed to shareholders) to bear those costs.¹⁰ LPI is not convinced that the Company has satisfied these requirements.

Increasing FCA rates represent one aspect that is part of the overall troubling trajectory of rates and bills on the Company’s system. For example, as it relates to the FCA, during the 2011-12 timeframe, fuel and purchased energy costs (including the base cost of fuel and the adjustment) appeared to average between \$19-\$20 per MWh.¹¹ In other words, customers’ fuel and purchased energy costs alone have increased by more than 60% in a little over 10 years. The magnitude of this increase appears counterintuitive in light of the Company’s decreased reliance on fossil fuel. Therefore, LPI submits this letter in part to request additional information from the Company in reply comment.

FCA rates and other increases are driving industrial customers’ rates and bills upward. According to the Company’s response to LPI Information Request No. 5000, Large Power customers’ average rate in 2022 was \$94.90 per MWh. Rates at this level are well above customers’ expectations and certainly raise concerns about the Company’s duty to have just and reasonable rates that comply with explicit state energy policy. In reply comments, LPI respectfully requests that the Company update the table in LPI Information Request No. 5000 (attached) to include 2022 actuals, updated/current 2023 information, and current 2024 forecasts inclusive of base rates, riders, FCA charges, etc.¹² In addition, LPI respectfully requests that the Company provide an additional level of detail, showing how each item contributes to the total number. For example, for 2022, it would indicate that \$31.91 per MWh is attributable to the FCA.¹³

In addition to the updated rates information, LPI requests the Company provide additional information in reply comments pertaining to increased market pricing in 2022 (and beyond), by supplementing the record with the following information: (a) if/how decisions to move baseload generation to seasonal/economic dispatch have exposed the Company to the market to a greater

⁷ Minn. Stat. § 216C.05, subd. 2(4).

⁸ Minn. Stat. § 216B.1696, subd. 2(a).

⁹ See *In re Petition of N. States Power Co.*, 416 N.W.2d 719, 722-23 (Minn. 1987).

¹⁰ *Id.* at 723 (finding that “by merely showing that it has incurred, or may hypothetically incur, expenses, the utility does not necessarily meet its burden of demonstrating that it is just and reasonable that the ratepayers bear the costs of those expenses”).

¹¹ *In the Matter of the 2011-2012 Annual Automatic Adjustment Reports*, PUC Docket No. E999/AA-12-757, [Minnesota Power Report](#) at Attach. 3, 1-2 (Aug. 31, 2012).

¹² LPI Information Request No. 5000 (attached as Exhibit A).

¹³ 2022 Report at 4. For costs associated with the FCA, LPI further requests that the Company provide a schedule breaking out the FCA costs by driver (*i.e.*, fuel costs, market purchases, etc.).

degree; (b) if/how the short- and long-term action plans in the Company's recent integrated resource plan (PUC Docket No. 21-33) impacted market exposure in 2022 or will impact market exposure in 2023 and beyond; (c) if/how the Company's existing demand response programs mitigate market exposure; (d) whether the Company is exploring economic demand response or other customer options to help further mitigate market exposure going forward; and (e) a detailed analysis explaining why/how FCA costs are increasing at a dramatic pace despite the Company's significantly lower reliance upon fossil-based fuel generation.

LPI looks forward to reviewing the Company's reply comments and 2024 forecast petition, and hopes the Company will endeavor to provide the information requested in paragraphs 4-5 (including footnote 13) herein, which will, undoubtedly, assist stakeholders in evaluating these important proceedings.

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

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Enclosures

cc: Service List

119239967.5 0064591-00006

LARGE POWER INTERVENORS

Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

Information Request No. 5000

a. Please update the data captured in Appendix L of the Company's pending Integrated Resource Plan (PUC Docket No. E015/RP-21-33), including the Company's requested increase in PUC Docket No. E015/GR-21-335 and other rate increases approved since the filing of the Company's Integrated Resource Plan Initial Filing. Table 1 from Appendix L is reproduced below as a representative sample.

Rate Class Impacts \1	2021	2022	2023	2024
Residential (average rate, cents/kWh)	12.114	12.114	12.114	12.114
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.49%	1.20%	1.31%
Average Impact (\$ / month)	-\$0.02	\$1.28	\$1.03	\$1.12
General Service (average rate, cents/kWh)	12.053	12.053	12.053	12.053
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.49%	1.20%	1.31%
Average Impact (\$ / month)	-\$0.09	\$4.72	\$3.78	\$4.10
Large Light & Power (average rate, cents/kWh)	9.434	9.434	9.434	9.434
Increase (cents/kWh)	-0.003	0.156	0.130	0.140
Increase (%)	-0.03%	1.66%	1.38%	1.49%
Average Impact (\$ / month)	-\$5.22	\$374.16	\$309.92	\$335.11
Large Power (average rate, cents/kWh)	7.223	7.223	7.223	7.223
Increase (cents/kWh)	-0.002	0.055	0.035	0.041
Increase (%)	-0.03%	0.76%	0.48%	0.57%
Average Impact (\$ / month)	-\$1,140	\$32,828	\$20,752	\$24,674
Lighting (average rate, cents/kWh)	19.086	19.086	19.086	19.086
Increase (cents/kWh)	-0.005	0.238	0.182	0.202
Increase (%)	-0.03%	1.25%	0.95%	1.06%
Average Impact (\$ / month)	-\$0.04	\$1.85	\$1.41	\$1.56
Average Weighted Increase (cents/kWh)	-0.002	0.099	0.074	0.083
Avg Weighted Increase (%)	-0.03%	1.15%	0.86%	0.96%
Notes: 1/ Average current rates are 2021 estimates. These estimates are based on 2020 base rates from Minnesota Power's last rate case (E-015/GR-19-442) with 2021 estimated cost recovery rider rates and estimated 2021 FPE and CPA factor added. CPA factor is not applied to Large Power Class.				

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS
Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

b. Referring to the response in subpart (a) above, please provide a second updated Appendix L chart to include all of the information in response to subpart (a) and the Company's planned or expected increases over the same period.

c. Using the updated information produced in subparts (a) and (b) above, please explain how the Company's projected rates achieve the state's policy goal that rates be 5% below the national average for all customer classes pursuant to Minn. Stat. § 216C.05, subd 2(4).

d. Using the updated information produced in subparts (a) and (b) above, please explain how the Company's projected rates comply with the state's policy goal to ensure competitive electric rates for energy-intensive, trade-exposed customers pursuant to Minn. Stat. § 216B.1696.

RESPONSE:

- a. Refer to the Table 1(a) below for the requested updates. The updated Average Current Rates by year include the Company's requested increase in MPUC Docket No. E015/GR-21-335 and other actual rates and approved rate increases since the filing of the Company's Integrated Resource Plan Initial Filing. The "Increase (cents/kWh)" and "Average Impact (\$/month)" are the original increases of the Preferred Plan as filed in the Company's Integrated Resource Plan Initial Filing. The "Increase (%)" is now calculated relative to the updated Average Current Rates, as opposed to being relative to only 2021 as in the original table. Otherwise, the original billing units, allocations and methodologies are unchanged from the initial filing.

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS

Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

Updated Table 1(a): Estimated Average Rate Impacts of Preferred Plan Relative to Actual and Projected Average Rates

Rate Class Impacts \1	2021	2022	2023	2024
Residential (average rate, cents/kWh)	12.867	15.442	15.565	15.565
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.17%	0.93%	1.02%
Average Impact (\$ / month)	-\$0.02	\$1.28	\$1.03	\$1.12
General Service (average rate, cents/kWh)	12.807	15.368	15.491	15.491
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.17%	0.94%	1.02%
Average Impact (\$ / month)	-\$0.09	\$4.72	\$3.78	\$4.10
Large Light & Power (average rate, cents/kWh)	10.187	12.281	12.491	12.491
Increase (cents/kWh)	-0.003	0.156	0.130	0.140
Increase (%)	-0.02%	1.27%	1.05%	1.13%
Average Impact (\$ / month)	-\$5.22	\$374.16	\$309.92	\$335.11
Large Power (average rate, cents/kWh)	8.040	9.490	9.605	9.605
Increase (cents/kWh)	-0.002	0.055	0.035	0.041
Increase (%)	-0.02%	0.58%	0.36%	0.43%
Average Impact (\$ / month)	-\$1,140	\$32,828	\$20,752	\$24,674
Lighting (average rate, cents/kWh)	19.840	23.721	23.937	23.937
Increase (cents/kWh)	-0.005	0.238	0.182	0.202
Increase (%)	-0.03%	1.00%	0.76%	0.84%
Average Impact (\$ / month)	-\$0.04	\$1.85	\$1.41	\$1.56
Average Weighted Increase (cents/kWh)	-0.002	0.099	0.074	0.083
Average Weighted Increase (%)	-0.02%	0.88%	0.65%	0.73%
Notes: 1/ 2021 average rates are based on 2020 base rates from Minnesota Power's last rate case (E-015/GR-19-442) updated with 2021 actual FAC, CPA and cost recovery rider rates. CPA factor is not applied to Large Power Class. 2022 average rates are based on 2020 base rates above updated with an 18.22 percent increase per the Company's current rate case (E-015/GR-21-335), and approved FAC with true-up, CPA rate and currently in-place cost recovery rider rates. 2023 average rates are				

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS
Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

based on 2022 average rates above, assuming in-place 2022 FAC and costs recovery rates continue. 2024 average rates are assumed the same as 2023 rates above.

- b. Refer to the Table 1(b) below for the requested updates. The updated Average Current Rates by year include the Company's requested increase in MPUC Docket No. E015/GR-21-335, other actual rates and approved rate increases since the filing of the Company's Integrated Resource Plan Initial Filing, and expected 2023 rate changes that have been filed, but not yet approved for the Fuel Adjustment Clause rates, Renewable Resources Rider rates and Transmission Cost Recovery rider rates. The "Increase (cents/kWh)" and "Average Impact (\$/month)" are the original increases of the Preferred Plan as filed in the Company's Integrated Resource Plan Initial Filing. The "Increase (%)" is now calculated relative to the updated Average Current Rates, as opposed to being relative to only 2021 as in the original table. Otherwise, the original billing units, allocations and methodologies are unchanged from the initial filing.

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS

Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

Updated Table 2(b): Estimated Average Rate Impacts of Preferred Plan Relative to Actual and Projected Average Rates

Rate Class Impacts \1	2021	2022	2023	2024
Residential (average rate, cents/kWh)	12.867	15.442	15.660	15.660
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.17%	0.93%	1.01%
Average Impact (\$ / month)	-\$0.02	\$1.28	\$1.03	\$1.12
General Service (average rate, cents/kWh)	12.807	15.368	15.587	15.587
Increase (cents/kWh)	-0.003	0.180	0.145	0.158
Increase (%)	-0.03%	1.17%	0.93%	1.01%
Average Impact (\$ / month)	-\$0.09	\$4.72	\$3.78	\$4.10
Large Light & Power (average rate, cents/kWh)	10.187	12.281	12.515	12.515
Increase (cents/kWh)	-0.003	0.156	0.130	0.140
Increase (%)	-0.02%	1.27%	1.04%	1.12%
Average Impact (\$ / month)	-\$5.22	\$374.16	\$309.92	\$335.11
Large Power (average rate, cents/kWh)	8.040	9.490	9.701	9.701
Increase (cents/kWh)	-0.002	0.055	0.035	0.041
Increase (%)	-0.02%	0.58%	0.36%	0.43%
Average Impact (\$ / month)	-\$1,140	\$32,828	\$20,752	\$24,674
Lighting (average rate, cents/kWh)	19.840	23.721	24.032	24.032
Increase (cents/kWh)	-0.005	0.238	0.182	0.202
Increase (%)	-0.03%	1.00%	0.76%	0.84%
Average Impact (\$ / month)	-\$0.04	\$1.85	\$1.41	\$1.56
Average Weighted Increase (cents/kWh)	-0.002	0.099	0.074	0.083
Average Weighted Increase (%)	-0.02%	0.88%	0.65%	0.72%
Notes: 1/ 2021 average rates are based on 2020 base rates from Minnesota Power's last rate case (E-015/GR-19-442) updated with 2021 actuals FAC, CPA and cost recovery rider rates. CPA factor is not applied to Large Power Class. 2022 average rates are based on 2020 base rates above updated with an 18.22 percent increase per the Company's current rate case (E-015/GR-21-335), and approved FAC with true-up, CPA rate and currently in-place cost recovery rider rates. 2023 average rates are				

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS

Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenor (Andrew P. Moratzka and Riley A. Conlin)

based on 2022 average rates above, updated for expected, filed but not yet approved 2023 FAC with true-up, new 2022 RRR rates assumed as of 3/1/2023 and new 2023 TCR rates assumed as of 1/1/2023. 2024 average rates are assumed the same as 2023 rates above.

- c. Minnesota Power strives to meet all Minnesota policy goals as well as state requirements. The projected rates for the IRP are projected rates for Minnesota Power and do not include projected rates for the national averages that would be compared for evaluating Minn. Stat. § 216C.05, subd 2(4) or competitiveness under Minn. Stat. § 216B.1696. Related to Minn. Stat. § 216B.1696, the Company voluntarily implemented an Energy Charge Credit to eligible Large Power customers without the need for any other customers to pay a surcharge. Because of this, when the EITE discount is discontinued, effective with final rate implementation in the current rate case, the Commission can continue to “ensure competitive electric rates for energy-intensive trade-exposed customers” by incorporating the discount into the final rate design.

Related to the energy policy statement in Minn. Stat. § 216C.05 subd. 2(4) that “It is the energy policy of the state of Minnesota that...retail electricity rates for each customer class be at least five percent below the national average,” Minnesota Power is extremely sensitive to keeping rates for its industrial customers and all other customer classes competitive and affordable. In developing its rate increase proposal for each customer class, Minnesota Power considered the Commission’s stated energy policy goals and desired regulatory outcomes, including reasonable rates that are affordable for customers.

As previously stated in the current rate case, Minnesota Power would prefer to have its industrial rates (the Large Power and Large Light and Power classes) and rates for all other classes reflect the CCOSS results but also recognizes that a transition is needed over time to avoid overly burdensome impacts on any particular class of customers and that there are rate impacts associated with this current IRP that will need to be allocated to all customer classes.

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

LARGE POWER INTERVENORS
Information Request

Docket Number(s): E015/RP-21-33; E015/GR-21-335;
E015/M-22-216; E015/M-21-60; E015/M-21-61

Date of Request: October 28, 2022

Requested From: Minnesota Power

Response Due: November 9, 2022

By: Large Power Intervenors (Andrew P. Moratzka and Riley A. Conlin)

d. See response to (c).

Witness: Stewart J Shimmin
Response by: Stewart J Shimmin
Title: Revenue Requirements Lead
Department: Rates
Telephone: (218) 355-3562

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.

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. E-015/AA-21-312

Dated this 17th day of April, 2023.

/s/ Carmel Laney
Carmel Laney

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, Minnesota 55803	Electronic Service	No	OFF_SL_21-312_AA-21-312
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325 Washington, DC 20036	Electronic Service	No	OFF_SL_21-312_AA-21-312
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
David F.	Boehm	dboehm@bklawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510 Cincinnati, OH 45202	Electronic Service	No	OFF_SL_21-312_AA-21-312
Elizabeth	Brama	ebrama@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_21-312_AA-21-312
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000 Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_21-312_AA-21-312
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	OFF_SL_21-312_AA-21-312
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Hillary	Creurer	hcreurer@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	OFF_SL_21-312_AA-21-312
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312
J.	Drake Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312
Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota St Ste W1360 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project	970 Raymond Avenue Suite G-40 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_21-312_AA-21-312
Catherine	Fair	catherine@energycents.org	Energy CENTS Coalition	823 E 7th St St Paul, MN 55106	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-312_AA-21-312
John R.	Gasele	jgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Tiana	Heger	theher@mnpower.com	Minnesota Power	30 W. Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kimberly	Hellwig	kimberly.hellwig@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312
Valerie	Herring	vherring@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_21-312_AA-21-312
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_21-312_AA-21-312
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2950 Yellowtail Ave. Marathon, FL 33050	Electronic Service	No	OFF_SL_21-312_AA-21-312
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nicolas	Kaylor	nkaylor@mojlaw.com		120 South 6th St Ste 2400 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Travis	Kolari	N/A	Keetac	PO Box 217 Keewatin, MN 55753	Paper Service	No	OFF_SL_21-312_AA-21-312
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	OFF_SL_21-312_AA-21-312
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403 Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101 Two Harbors, MN 55616	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-312_AA-21-312
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050 Boise, ID 83799-0050	Electronic Service	No	OFF_SL_21-312_AA-21-312
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-312_AA-21-312
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_21-312_AA-21-312
Emily	Marshall	emarshall@mojlaw.com	Miller O'Brien Jensen, PA	120 S. 6th Street Suite 2400 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
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_21-312_AA-21-312
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street Clouquet, MN 55720	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
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_21-312_AA-21-312
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-312_AA-21-312
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620 St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Michael	Noble	noble@fresh-energy.org	Fresh Energy	408 Saint Peter St Ste 350 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Christopher J.	Oppitz	N/A	-	PO Box 910 Park Rapids, MN 56470-0910	Paper Service	No	OFF_SL_21-312_AA-21-312
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661 Duluth, MN 55803	Electronic Service	No	OFF_SL_21-312_AA-21-312
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave Cohasset, MN 55721	Electronic Service	No	OFF_SL_21-312_AA-21-312
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-312_AA-21-312
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
Claire	Rajala	cmrajala@allte.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-312_AA-21-312
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-312_AA-21-312
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_21-312_AA-21-312
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028 Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_21-312_AA-21-312
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street Duluth, MN 55806	Electronic Service	No	OFF_SL_21-312_AA-21-312
Santi	Romani	N/A	United Taconite	PO Box 180 Eveleth, MN 55734	Paper Service	No	OFF_SL_21-312_AA-21-312
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_21-312_AA-21-312
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_21-312_AA-21-312
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_21-312_AA-21-312
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_21-312_AA-21-312
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_21-312_AA-21-312
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_21-312_AA-21-312
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_21-312_AA-21-312
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_21-312_AA-21-312
Kristen	Vake	kvake@taconite.org	Iron Mining Association of Minnesota	1003 Discovery Drive Chisholm, MN 55719	Electronic Service	No	OFF_SL_21-312_AA-21-312
Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP	80 S 8th St Ste 2200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-312_AA-21-312

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_21-312_AA-21- 312
Laurie	Williams	laurie.williams@sierraclub. org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_21-312_AA-21- 312
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_21-312_AA-21- 312