



May 22, 2023

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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 Automatic Adjustment Charges for the Period of January 2022 through December 2022
PUC Docket No. E-015/AA-21-312**

Dear Mr. Seuffert:

The Large Power Intervenors ("LPI")¹ submit the following letter response comment pursuant to the Minnesota Public Utilities Commission's ("Commission") Notice of Extended Reply and Response Comment Periods in the above-titled docket.² Consistent with its April 17, 2023, letter comment and for the reasons elaborated upon below, LPI maintains that Minnesota Power has not met its burden to demonstrate that its proposed \$13.3 million 2022 fuel and purchased energy true-up ("FCA" or "FCA True-Up") will result in just and reasonable rates. The proposed FCA True-Up should instead be eliminated or, at a minimum, reduced.³ Additionally, in an attempt to curb continuing increases, LPI urges the Commission to order Minnesota Power to explore rate mitigation options in future proceedings.

A. The Commission Should Reject Minnesota Power's Request for a \$13.3 Million 2022 FCA True-Up

The Commission is charged with, and possesses authority to, set just and reasonable rates for ratepayers. When assessing the reasonableness of costs, the Commission must determine whether the Company has (a) demonstrated the amount of given costs as a judicial fact,⁴ and (b)

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 Notice of Extended Reply and Response Comment Periods (Apr. 21, 2023) (eDocket No. 20234-195059-01).

³ Letter Comment by LPI at 2-3 (Apr. 17, 2023) (eDocket No. 20234-194882-01) ("LPI Letter").

⁴ *See In re Petition of N. States Power Co.*, 416 N.W.2d 719, 722-23 (Minn. 1987).

established that it is just and reasonable for ratepayers (as opposed to shareholders) to bear those costs.⁵ Minnesota law unequivocally prioritizes rate competitiveness in the determination of just and reasonable rates. First, it is the energy policy of the state that “retail electricity rates for each customer class be at least five percent below the national average.”⁶ Second, it is also Minnesota’s goal to “ensure competitive electric rates for energy-intensive trade-exposed customers.”⁷ In the LPI Comment, LPI requested additional information from Minnesota Power to facilitate further analysis in reply comments. While appreciative of the information provided by the Company,⁸ Minnesota Power has not demonstrated that it is just and reasonable for ratepayers to bear further increases at this time.

Increasing FCA costs are placing unreasonable strains on customers. In 2022, the Company’s initially forecasted total cost of fuel was \$229,065,935 (subsequently increased by \$36 million and potentially increasing by \$13.3 million more).⁹ In 2023 and 2024 the Company’s forecasts increased to \$265,752,178 and \$263,625,304, respectively.¹⁰ These costs are, undoubtedly, contributing to increasing projected rates for customers, which are trending upwards at an alarming rate applying Company projections. For example, when responding to LPI Information Request No. 5000 in November 2022, the Company’s 2023 and 2024 projected rate for Large Power customers was approximately \$97.01/MWh.¹¹ In response to LPI’s request, Minnesota Power updated these projections in the MP Reply Comment (filed approximately six months after the initial LPI Information Request No. 5000). **In the span of only a few months, the Company’s 2023 and 2024 Large Power customer projections are now approximately \$100.66/MWh and \$104.53/MWh, respectively.**¹² The Commission must address these shockingly high projections and act to give meaning to explicit state policy.

As this pertains to the additional \$13.3 million FCA True-Up at issue in this proceeding, LPI remains concerned that continuing increases are not just and reasonable at this time. The Company’s ratepayers are already facing increased costs due to the Company’s 2021 rate case.¹³

⁵ *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”).

⁶ Minn. Stat. § 216C.05, subd. 2(4).

⁷ Minn. Stat. § 216B.1696, subd. 2(a).

⁸ Reply Comment by Minnesota Power (May 11, 2023) (eDocket No. 20235-195781-02) (“MP Reply Comment”).

⁹ Initial Filing by Minnesota Power at 5 (May 3, 2021) (eDocket No. 20215-173763-01).

¹⁰ *In the Matter of Minnesota Power’s Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2023 through December 2023*, PUC Docket No. E-015/AA-22-216 Initial Filing by Minnesota Power at 7, Table 1 (May 2, 2022); *In the Matter of Minnesota Power’s Petition for Approval of the Annual Forecast of Automatic Adjustment Charges for the Period of January 2024 through December 2024*, PUC Docket No. E-015/AA-23-180, Initial Filing by Minnesota Power at 6 (May 1, 2023). Over the 2022 to 2024 forecasting period the Company’s forecasted MWh sales ranged from 8,572,304 MWh to 8,978,100.

¹¹ LPI Letter at Ex. A, Table 2(b).

¹² MP Reply Comment at Updated Table 2(b).

¹³ *See In the Matter of the Application by Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota*, PUC Docket No. E-015/GR-21-335.

Furthermore, customers already paid, and did not object to, the Company's proposal to increase FCA rates by \$36 million during 2022.¹⁴ To add another \$13.3 million will only serve to compound the uncompetitive rate pressures described above. When taken together, the Company's 2022 FCA incremental true-ups (\$36 million + \$13.3 million = \$49.3 million) and the approved increase in the Company's rate case (which is roughly 9% or around \$58 million)¹⁵ is nearly the same value as Minnesota Power's initially requested increase in its rate case.¹⁶ In other words, the incremental 2022 FCA True-Ups have roughly covered the Commission's reduction to the Company's requested revenue deficiency in its rate case. And, while a \$13.3 million true-up appears relatively minor, the fact remains that Minnesota Power's average delivered cost of energy is untenable.

LPI therefore respectfully requests that the Commission exercise its broad ratemaking authority and carefully analyze the Company's proposed \$13.3 million FCA True-Up request within the broader scope of the overall increases facing customers to determine whether further increases are appropriate.

B. The Commission Should Order Exploration of Rate Mitigation Strategies

LPI requests that the Commission also order Minnesota Power to explore further rate mitigation options to provide customers with additional opportunities to control rapidly increasing electricity costs. Minnesota Power acknowledges that it "continually evaluates additional demand response," and that it has been ordered to pursue more demand response options.¹⁷ Given the current trajectory of customers' rates (described above), the need to facilitate these proposals is urgent, and LPI believes that stakeholder conversations and workshops should begin as soon as possible. The Commission has previously ordered the Company to work with customers on rate design issues, and LPI urges the Commission to direct a similar process here.¹⁸

In terms of timing, LPI appreciates the Commission's direction to the Company in its rate case in terms of addressing the Large Light & Power time-of-use rate in either the potentially forthcoming 2023 rate case or the Company's 2025 FCA forecast docket.¹⁹ These options would also be ideal for the Company to address potential rate mitigation options. Therefore, LPI's preferred approach would be for the Commission to direct the Company to work with customers throughout the remainder of 2023 and include a discussion of potential rate mitigation options

¹⁴ 2022 Annual True-Up Report at 1 (Mar. 1, 2023) (eDocket No. 20233-193558-01).

¹⁵ *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, PUC Docket No. E-015/GR-21-335, Findings of Fact, Conclusions, and Order at 1, 69 (Feb. 28, 2023).

¹⁶ *Id.* at 1 (the combined true-ups of \$49.3 million + \$58 million (the approximate value of the final rate case increase) = \$107.3 million, nearly the same as the initially requested \$108.3 million in the rate case).

¹⁷ MP Reply Comment at 5.

¹⁸ *See In the Matter of Minnesota Power's Compliance Report on Rate Design for Large Power Customers*, PUC Docket No. E-015/M-21-61.

¹⁹ *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, E-015/GR-21-335, Order Denying Petitions for Reconsideration and Granting, in Part, Requests for Clarification at 2 (May 15, 2023).

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and/or a new demand response proposal in the potentially filed 2023 rate case or around the timing of the 2025 FCA forecast docket.

LPI is grateful for the opportunity to provide this letter in response to the MP Reply Comment, and looks forward to working with parties on this matter going forward.

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

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Enclosures

cc: Service List

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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 address indicated below by electronic mail at Minneapolis, Minnesota.

RESPONSE LETTER COMMENT SUBMITTED ON BEHALF OF THE LARGE POWER INTERVENORS

In the Matter of Minnesota Power's Petition
for Approval of the Annual Automatic
Adjustment Charges for the Period of
January 2022 through December 2022
PUC Docket No. E-015/AA-21-312

Dated this 22nd day of May, 2023.

/s/ Carmel Laney

Carmel Laney

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