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November 18, 2019

**VIA ELECTRONIC FILING**

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
350 Metro Square Building  
121 Seventh Place East  
St. Paul, MN 55101

Re: Minnesota Power's Reply Comments on Completeness  
*In the Matter of the Application of Minnesota Power for Authority to Increase  
Electric Service Rates in Minnesota*  
MPUC Docket No. E015/GR-19-442

Dear Mr. Wolf:

Enclosed for filing, please find Minnesota Power's Reply Comments on Completeness in the above-referenced matter. By copy of this letter, I am providing service to those listed on the service list on file with the Minnesota Public Utilities Commission.

If you have any questions, please feel free to contact me.

Yours truly,

David R. Moeller

Enclosure  
cc: Service List

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

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Docket No. E015/GR-19-442

In the Matter of the Application of  
Minnesota Power for Authority to Increase  
Electric Service Rates in Minnesota

**MINNESOTA POWER’S  
REPLY COMMENTS ON  
COMPLETENESS**

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**INTRODUCTION**

On November 1, 2019, ALLETE, Inc. d/b/a Minnesota Power (“Minnesota Power” or “the Company”) filed a Notice of Change in Rates in the above-captioned docket pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. R. 7825.3200(A). Minnesota Power also filed a Petition for Interim Rates pursuant to the Statement of Policy on Interim Rates of the Minnesota Public Utilities Commission (“Commission”). The Commission issued its Notice of Comment Period on Completeness and Procedures (“Notice on Completeness”) on November 5, 2019, seeking comments on whether Minnesota Power’s rate change notice complies with the filing requirements set out in statute, rule, and relevant Commission’s orders, and whether the filing should be referred to the Office of Administrative Hearings (“OAH”) for contested case proceedings.

On November 12, 2019, the Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed comments regarding the two issues identified in the Commission’s Notice on Completeness. The Department identified that portions of the Company’s Schedule H (employee travel and entertainment data) was provided by link to a public-facing Company website rather than e-filed on November 1, and that the Company immediately also e-filed Schedule H on November 7, 2019 at the Department’s request. As such, the Department recommended that the Commission find Minnesota Power’s initial filing complete as of either November 1 or November 7, 2019. In addition, both the Department and an ad hoc association of large industrial customers of Minnesota Power known as the Large Power Intervenors (“LPI”) recommended submitting the matter to the OAH for contested case proceedings.

Although the Commission did not request comments on any other issues, the Department also included commentary on interim rates, suggesting that the Commission depart from the

statutory interim rate formula in a single respect. Comments on interim rates levels were also filed on November 12, 2019, by the Minnesota Office of the Attorney General – Residential Utilities and Antitrust Division (“OAG”) and LPI. As interim rates must be set by the Commission ex parte, these unsolicited comments do not comply with Minnesota law or with the Commission’s Notice on Completeness. Accordingly, they should not be formally accepted or considered by the Commission. In addition, the proposals to reduce interim rates would result in inequitable and incurable harm to Minnesota Power and do not warrant a departure from the statutory interim rate formula.

## **COMMENTS**

### **A. The Issues Noticed by the Commission**

#### **1. Completeness**

Minnesota Power appreciates the Department’s thorough review of the Company’s initial filing. Consistent with the Department’s comments, the Company agrees that this matter should be accepted, and supports referral of the matter to the OAH for contested case proceedings.

With respect to the date on which the Company’s filing should be deemed complete, the Department noted that “Minnesota Power filed a link to Schedule H information in eDockets on November 1, so the Commission may determine that the case was technically complete as of November 1.”<sup>1</sup> The Department also recommended that “the Commission accept the Application as complete as of November 1, 2019, when Minnesota Power filed its rate case, or as of November 7, 2019, when the Company filed its complete Schedule H information.”<sup>2</sup>

Minnesota Power respectfully submits that the Company’s application was complete, or substantially complete, as of November 1, 2019. In addition to submitting a live link to all of Schedule H in the e-filing, the Company provided courtesy copies of the materials to Commission Staff, the Department, the OAG, and LPI. (This was the same manner in which the Company submitted this data in its most recent rate case, where it was not considered a completeness question.) For these reasons, and because the Company’s approach did not impede any party’s ability to review all components of the filing, Minnesota Power recommends that the Commission accept the filing as complete, or substantially complete, as of November 1, 2019.

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<sup>1</sup> Department Initial Comments on Completeness at 2.

<sup>2</sup> Department Initial Comments on Completeness at 3.

Whether the Commission determines that the filing was substantially complete as of November 1 or 7, 2019, Minnesota Power requests Commission approval to implement interim rates beginning on January 1, 2020. Pursuant to Minn. Stat. § 216B.16, subd. 3 “the Commission shall order an interim rate schedule into effect *not later than 60 days after the initial filing date*” (emphasis added). In other words, the Commission may order an interim rate schedule within *or* up to 60 days after the initial filing. Customer noticing and billing is greatly simplified by a January 1 implementation date, reducing potential confusion to the customer and enhancing administrative efficiency for the Company.

**2. Submission of the Case to the OAH**

The Department, OAG, and LPI recommend submission of Minnesota Power’s Application to the OAH for a contested case proceeding. The Company agrees to this recommendation.

**B. Other Issues Raised by the Parties**

**1. Standard for Establishing Interim Rates**

By Minnesota law, the Commission “*shall* order the interim rate schedule *ex parte* without a public hearing.”<sup>3</sup> Consistent with this requirement, the Commission’s November 5, 2019 Notice on Completeness did not include Minnesota Power’s interim rate petition as a topic open for comment. Nevertheless, Department, OAG, and LPI submitted unsolicited comments about Minnesota Power’s interim rate petition and made varying proposals. Minnesota Power respectfully requests that the Commission set interim rates as the Company proposed, on an *ex parte* basis without consideration of these comments, as statutorily required.<sup>4</sup>

In addition to and apart from the *ex parte* requirement, Minn. Stat. § 216B.16, subd. 3(b) requires the Commission to establish interim rates pursuant to the specific formula set forth in that statutory subdivision, unless exigent circumstances exist. Here, no party disputes that Minnesota Power’s interim rate request follows the statutory formula.<sup>5</sup> Furthermore, neither the Department

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<sup>3</sup> Minn. Stat. § 216B.16, subd. 3(a) (emphasis added).

<sup>4</sup> To the extent relevant to Minnesota Power’s application to increase final rates, parties are able to raise issues during the course of this rate case proceeding. The interim rate issues raised by OAG, Department, and LPI are not appropriately raised in completeness comments.

<sup>5</sup> Specifically, Minnesota Power established its interim rate request based on the language of Minn. Stat. § 216B.16, subd. 3(b), by using the *proposed* test year cost of capital, rate base, and expenses, a rate of return equal to that authorized in Minnesota Power’s 2016 Rate Case, rate base and expenses of the same kind authorized by the Commission in Minnesota Power’s 2016 Rate Case, and no change in the existing Commission-approved rate design.

nor LPI suggest that exigent circumstances exist to justify their proposed reductions.<sup>6</sup> Even so, the Department, LPI, and OAG ask the Commission to depart from this formula and reduce the Company's rates even before the contested case begins. These proposals would cause immediate, unrecoverable harm to the Company by reducing its interim rate revenues without the opportunity to correct any under recoveries, and should be rejected.

## **2. Department Comments**

In its Notice and Petition for Interim Rates, Minnesota Power identified its proposed treatment of a 10-year, 100 MW asset-based power market sales contract with Basin Electric Power Cooperative (the "Large Market Contract" or "LMC") that ends April 30, 2020, in an effort to be transparent about how this contract was being addressed for purposes of interim and final rates. Specifically, Minnesota Power removed four months of LMC margins from the 2020 test year to achieve balanced annualization of the contract in both the 2010 and 2020 test years. In its interim rate petition, the Company noted that:

During the course of the 2009 Rate Case, the Commission adjusted Minnesota Power's 2010 test year to reflect 12 full months of asset-based wholesale margins from the LMC, although Minnesota Power only received eight months of LMC revenues in that test year. The LMC will now expire during the 2020 test year (on April 30, 2020). As a result of the adjustment made in Minnesota Power's 2009 Rate Case, customers will have received the full benefit of ten years of LMC asset-based wholesale margins by December 31, 2019. As such, the Company's proposed 2020 test year reflects removal of four months of margins from both final and interim rates. This adjustment maintains symmetrical LMC revenues between the test years at the beginning and end of the contract, as well as consistency with the requirement of Minn. Stat. § 216B.16, subd. 3(b) that a utility's interim rate schedule shall be calculated using the proposed test year cost of capital, rate base, and expenses.<sup>7</sup>

The Department and LPI take issue with Minnesota Power's interim and final rate adjustment related to the LMC. In particular, the Department argues that four months of margins from LMC should not be removed from interim rates because "there may be new contracts or additional asset-based margins through the Midcontinent Independent System Operator's

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<sup>6</sup> While OAG does argue that exigent circumstances exist, the OAG's proposal to reduce interim rates is made on wholly different grounds than the Department's or LPI's approaches.

<sup>7</sup> See Minnesota Power Notice and Petition for Interim Rates (internal citations omitted).

["MISO"] energy market that may replace some or all these contract margins.”<sup>8</sup> This speculation does not warrant departure from the statutory focus on the proposed test year revenue and expenses, and does not constitute exigent circumstances. Exigent circumstances is a situation that “demands unusual or immediate action”<sup>9</sup> and “bespeaks urgency or emergency.”<sup>10</sup> There is no urgent situation here when there is the ability to develop the record on this issue in the upcoming contested case proceeding, and the interim rate level will continue well into 2021 but is adjusted when final rates are set.

In any event, Minnesota Power already included a description and available data on replacement sales in its total asset-based wholesale margin estimate for the 2020 test year. As explained in Direct Testimony submitted by Company witness Julie I. Pierce, Minnesota Power’s test year assumptions included three ongoing bilateral contracts, along with an estimate for MISO market sales determined using an RTSim production cost model.<sup>11</sup> Thus, Minnesota Power did not simply remove the LMC, but rather also included replacement sales that could be achieved once the LMC expired and additional surplus generation was available to sell to determine its total estimated asset-based wholesale margin for the 2020 test year.

In estimating these asset-based wholesale sales, Minnesota Power also took into account changes in the Company’s generation portfolio since 2010 that impact both the amount of surplus generation available for wholesale transactions and the sale price for the test year transactions. Ms. Pierce explained that as part of Minnesota Power’s *EnergyForward* strategy, its generation portfolio has shifted to rely more on renewable generation sources (primarily wind generation) and less on thermal generation.<sup>12</sup> This shift has decreased the amount of surplus generation Minnesota Power has available to make both bilateral contract sales and MISO market sales.<sup>13</sup> At the same time, the increase in wind generation across the MISO footprint has also impacted MISO market pricing, in that MISO prices are generally lower when wind generation output is at its highest levels – when Minnesota Power has surplus generation – and higher when wind generation output

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<sup>8</sup> Department’s Initial Comments on Completeness at 3-4.

<sup>9</sup> *In re the Application of Minn. Power for Authority to Increase Rates for Elec. Serv. in Minnesota*, 838 N.W.2d 747, 757 (Minn. 2013) quoting Black’s Law Dictionary 227 (9th ed. 2009).

<sup>10</sup> *In re the Application of Peoples Nat. Gas Co. for Auth. To Increase Rates for Gas Util. Serv. in Minn.*, 389 N.W.2d 903, 907 (Minn. 1986).

<sup>11</sup> Direct Testimony of Julie I. Pierce at 32.

<sup>12</sup> Direct Testimony of Julie I. Pierce at 6-7.

<sup>13</sup> Direct Testimony of Julie I. Pierce at 9.

is at its lowest levels and Minnesota Power does not have surplus generation to sell.<sup>14</sup> Specifically, as noted by Ms. Pierce, “in 2018 on-peak market prices were 17 percent higher than the average in low wind periods and 19 percent lower than average in the high wind periods.”<sup>15</sup> As a result, Minnesota Power’s projected asset-based wholesale sale margins for the 2020 test year already include reasonable assumptions about the amount and revenue offsetting the expiration of the LMC.

Finally, to the extent the Department disputes Minnesota Power’s estimate of its test year asset-based wholesale margin, this is not an appropriate basis for an adjustment to the Company’s interim rate request. At this point in the proceeding, the only evidence (both testimony and data) related to asset-based wholesale sales margins has been provided by Minnesota Power in its initial filing. In contrast, the Department’s assertion that there may be additional sales is speculation at this time.

If any adjustment to Minnesota Power’s initial test year estimate for its wholesale sales margin is ultimately warranted during the course of the proceeding, the appropriate time to make such an adjustment is in final rates after this issue has been fully developed during the contested case proceeding. The statutory interim rate formula, which ensures full refunds to customer with interest (without similar protections to the Company), contemplates exactly this course of action. Conversely, if the Department’s proposal were accepted and no further wholesale margin develops, the Company would lose approximately \$10 million in revenue requirement annually, with no opportunity to recapture the loss. This harm would be compounded – and in fact doubled or more – if the regulatory process requires continuation of interim rates well into 2021 or even 2022. As such, an interim rate reduction is not warranted.

### **3. LPI Comments**

In its comments, LPI seeks “clarification” and further information regarding the treatment of the LMC in Minnesota Power’s 2009 rate case. Fundamentally, LPI questions Minnesota Power’s assertion that its customers have received the full 10 years of benefit from the LMC as of December 31, 2019. However, Minnesota Power’s initial filing contains the information demonstrating that removal of the LMC from the test year is consistent with the Commission’s

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<sup>14</sup> Direct Testimony of Julie I. Pierce at 17.

<sup>15</sup> Direct Testimony of Julie I. Pierce at 17.

prior treatment of this contract in the 2009 rate case, and that customers have received 10 full years of benefit from this contract by the end of 2019.

As identified in the Company's interim rate petition and further explained by Ms. Pierce in testimony, the LMC commenced on May 1, 2010 – during the 2010 test year for Minnesota Power's 2009 rate case. In its initial filing in the 2009 rate case, Minnesota Power proposed to include only eight months of sales from the LMC in the test year to match the actual amount of sales that would occur during the 2010 calendar test year.<sup>16</sup> In its Direct Testimony in that case, the Department countered by requesting that the Company average four months of its asset-based wholesale margins from May to August 2010 and annualize that average over the entire 2010 test year.<sup>17</sup> Those selected four months included the then-new LMC as well as another new bilateral contract with Otter Tail Power Company ("OTP"), but excluded a separate contract with Great River Energy ("GRE") that was expiring in April 2010.<sup>18</sup> The Department justified this annualization by noting that both the LMC and the OTP contract were known and measureable changes for ratemaking purposes. Specifically with regard to the LMC, the Department testified that:

[t]his wholesale contract begins on May 1, 2010 and is a ten-year contract. As a result, the revenues collected by MP from [the LMC] is a known and measureable change in MP's circumstances that will extend a number of years. Therefore, for purposes of setting rates I recommend that this known and measurable change regarding the new [LMC] be reflected for the full 12 months.<sup>19</sup>

In Rebuttal Testimony, Minnesota Power agreed to the Department's methodology and thus incorporated a full 12 months of LMC sales into the Company's 2010 test year asset-based sale calculation.<sup>20</sup> Although Minnesota Power and the Department entered into a multi-party stipulation regarding overall asset-based wholesale margins, the stipulated amount was the mid-

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<sup>16</sup> *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota* ("Minnesota Power's 2009 Rate Case"), Docket No. E015/GR-09-1151, SEELING DIRECT at 14 (Nov. 2, 2009).

<sup>17</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, CAMPBELL DIRECT at 46-48 (March 31, 2010).

<sup>18</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, CAMPBELL DIRECT at 45 (March 31, 2010).

<sup>19</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, CAMPBELL DIRECT at 47 (March 31, 2010).

<sup>20</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, SEELING REBUTTAL at 7 (April 29, 2010) ("As suggested by Ms. Campbell, Minnesota Power has replaced the GRE contract by annualizing the [LMC] and OTP contracts in its model").

point between the Company's and the Department's *rebuttal* positions.<sup>21</sup> Thus, the stipulation included the adjustments made by Minnesota Power in rebuttal to annualize four months of LMC and OTP revenues across the entire 12 months of the test year. The Commission ultimately adopted the multi-party stipulation on this wholesale margin amount.<sup>22</sup> As a result, the 2010 test year credited Minnesota Power customers a full 12 months of revenue from LMC even though the contract only provided eight months of actual revenue to the Company in 2010. LPI was a party to this stipulation and in fact, helped to negotiate it; as such, LPI had a role in developing this outcome.

To further address LPI's questions, the annualization of two contracts did not result in an "offsetting calculation" to the LMC contract. The LMC and OTP contract were much larger contracts than the expiring GRE contract, and thus the annualization of these two contracts provided greater benefits in terms of revenue credits to Minnesota Power's customers than if the contracts had simply been incorporated into the test year based on actual expiration and start dates. As explained by Minnesota Power's witness Peter Seeling in the 2009 rate case, "[b]y substituting annualized [LMC]/OTP margins for the GRE contract, [the Department] increased the test year wholesale margins by an additional \$2.1 million."<sup>23</sup>

Given the treatment of LMC in the 2010 test year, it is appropriate to remove the remaining four months of margins from the LMC during the 2020 test year. Such treatment recognizes that customers have already received a full year of benefits from this contract during its first year, such that additional revenue credit in the last year of the contract would result in double counting of this revenue (or more, if the interim rates extend well beyond the test year, as is typically the case for Minnesota regulatory proceedings). Minnesota Power's proposed treatment is also consistent with the Department's recognition in the 2009 rate case that the test year should reflect known and measurable changes going forward. The LMC contract is expiring and inclusion of its revenues in the 2020 test year would set the asset-based wholesale margins too high on a going forward basis.

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<sup>21</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, ALJ REPORT at Finding No. 66 (Aug. 17, 2010) ("Multi-Party Stipulation provides for \$37.7 million in test year wholesale margins, which is the mid-point between Minnesota Power's proposed \$35.2 million and the [Department's] \$40.2 million.").

<sup>22</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, FINDINGS OF FACT, CONCLUSIONS, AND ORDER AT 15 (Nov. 2, 2010) ("Further, the Commission concurs with the Administrative Law Judge that the test-year wholesale margins agreed to by the parties are reasonable and supported by substantial record evidence.").

<sup>23</sup> *Minnesota Power's 2009 Rate Case*, Docket No. E015/GR-09-1151, SEELING REBUTTAL at 6 (April 29, 2010).

Further, as noted above, the LMC adjustment is not an exigent circumstance or urgent situation that requires the Commission to depart from the statutorily provided interim rates formula at this early stage of record development.

Finally, reducing revenues for the LMC contract would preclude the Company from recovering its full cost of service without adequate recourse, whereas the interim rate statute fully protects customers while this issue is vetted during the contested case process. This process is intended to maintain Minnesota Power's financial health during the regulatory process. With the Company having been recently downgraded by a credit rating agency, and managing against an existing negative outlook, deviating from the statutory formula to reduce interim rates would only put the Company at further risk and undermine the legislative intent of the interim rate statute. Accordingly, no adjustment to the Company's proposed interim rates is warranted.

#### **4. OAG comments**

##### **a. Averaging to Adjust Interim Rates**

Interim rates are calculated under Minn. Stat. § 216B.16, subd. 3(b) unless the Commission finds that exigent circumstances exist. In this context, the Minnesota Supreme Court has noted definitions of "exigent circumstances" as including "unusual or immediate action" or "bespeaks urgency or emergency."<sup>24</sup> The OAG has not identified any emergency, but rather made the same or similar arguments on interim rates that it has made in several recent and past rate case proceedings.<sup>25</sup>

Unlike in CenterPoint Energy Resources Corporation's ("CenterPoint") last rate case (Docket No. G008/GR-17-285), relied upon by the OAG, Minnesota Power does not have a combination of the factors cited in that case that supported the Commission's finding of exigent circumstances.

The OAG argues that because the Commission found exigent circumstances existed under the facts of the 2017 CenterPoint Energy Rate Case,<sup>26</sup> the Commission should do so for Minnesota Power's current interim rate petition.<sup>27</sup> The OAG specifically attempts to draw a parallel between

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<sup>24</sup> *In re Application of Minn. Power for Auth. to Increase Rates for Electric Serv. in Minn.*, 838 N.W.2d 747, 757-58 (Minn. 2013).

<sup>25</sup> OAG Initial Comments on Completeness at 5.

<sup>26</sup> *In the Matter of the Application of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas, for Auth. to Increase Rates for Nat'l Gas Util Svc. in Minn.* ("2017 CenterPoint Rate Case"), Docket No. G008/GR-17-285, ORDER SETTING INTERIM RATES at 3 (Sept. 29, 2017).

<sup>27</sup> OAG Initial Comments on Completeness at 5.

(1) a comparison of final rate determinations with approved interim rates in CenterPoint's last six rate cases and (2) Minnesota Power's four most recent rate cases, as the basis to find exigent circumstances.<sup>28</sup>

First, a comparison of past rate case outcomes does not bespeak urgency – nor is it surprising or inconsistent with the statutory interim rate process. The OAG makes fundamentally the same arguments it has made in several other rate cases, indicating an interest in obtaining a discount rather than identification of an emergency situation. Further, the OAG does not acknowledge that the Company has already voluntarily proposed several adjustments in formulating a reasonable interim rate request in compliance with the interim rate statute. Nor does the OAG acknowledge that the statutory structure is intended to assure revenues to the utility during the interim rate period, while protecting the customer by requiring the Company to: (1) refund any over collections while limiting recoupment of under collections and (2) pay interest on refunds but not accrue interest on under collections.<sup>29</sup> Additionally, the OAG does not address how its proposed interim rate reduction would affect the utility's ability to provide safe and reliable service in Minnesota during the interim rate period.

Second, in comparing approved interim rate increases to the final rate determinations, the OAG glosses over a key differentiating factor: in all six of the cited CenterPoint rate cases, filed between 2004 and 2017, CenterPoint's final approved rates were less than interim rates.<sup>30</sup> Additionally, CenterPoint's interim rates were in excess of final rates in a range from 16 percent to 47 percent.<sup>31</sup> Minnesota Power's rate request do not follow this same trend.

Going back to 1994, Minnesota Power has filed four rate cases prior to the current case.<sup>32</sup> In one of those four cases (Docket No. E015/GR-09-1151), the final rates determined by the Commission *exceeded* Minnesota Power's interim rate increase.<sup>33</sup> Further, in one of those four cases (Docket No. E015/GR-94-001), the final rate determined by the Commission was only 5.5 percent less than the interim rate increase.<sup>34</sup> Finally, the comparison of interim rates to final rates

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<sup>28</sup> OAG Initial Comments on Completeness at 5.

<sup>29</sup> Minn. Stat. § 216.16, subd. 3(c).

<sup>30</sup> *2017 CenterPoint Rate Case*, Docket No. G008/GR-17-285, ORDER SETTING INTERIM RATES at 3 (Sept. 29, 2017).

<sup>31</sup> *2017 CenterPoint Rate Case*, Docket No. G008/GR-17-285, STAFF BRIEFING PAPERS ON INTERIM RATES at 5 (Sept. 7, 2017).

<sup>32</sup> OAG Initial Comments on Completeness at 3.

<sup>33</sup> OAG Initial Comments on Completeness at 3.

<sup>34</sup> OAG Initial Comments on Completeness at 3.

for Minnesota Power's 2016 Rate Case was greatly impacted by the Company's proactive reduction of interim rates to account for post-filing news of the pending Keetac restart and the overall impact of the energy-intensive, trade-exposed customer rate authorized under Minn. Stat. § 216B.1696. For each of these reasons, it is unfair to attempt to compare the Commission's finding of exigent circumstances in the 2017 CenterPoint rate case to Minnesota Power's present interim rate petition. Minnesota Power therefore recommends rejection of the OAG's comments on both procedural and substantive grounds, and that the Commission approve implementation of the Company's requested interim rate schedule.

**b. Interest Rate on Potential Interim Rate Refunds**

Finally, LPI and OAG raise the issue of the reasonable level of interest to be applied to an interim rate refund, in the event interim rates are higher than proposed final rates. Minnesota law requires the Commission to set interim rates on an ex parte basis and that any issues regarding interest for any interim rate refund may be reserved and addressed by a party during the pendency of the rate case. While the Commission has set a default rate of interest in Minn. R. 7825.3300 as the average prime interest rate, Minn. Stat. § 216B.16, subd. 3(c) provides that the interest rate shall be determined by the Commission. However, a pre-determination of the appropriate rate of interest for a potential refund to customers would be improper at this time. The LPI and/or OAG may raise the amount of the interim rate refund interest rate during the contested case process, and the Commission has authority to assess and determine the appropriate rate of interest based upon the record established in this proceeding. This approach would also be consistent with past Commission practice.

**CONCLUSION**

Minnesota Power respectfully requests that the Commission find its Notice of Change in Rates complete as of November 1, 2019, and implement its proposed interim rate schedule effective January 1, 2020.

November 18, 2019.

Respectfully submitted,

**MINNESOTA POWER**



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**ATTORNEYS FOR MINNESOTA POWER**

IN THE MATTER OF THE APPLICATION OF  
MINNESOTA POWER FOR AUTHORITY TO  
INCREASE ELECTRIC SERVICE RATES IN  
MINNESOTA

MPUC DOCKET No. E015/GR-19-442

**CERTIFICATE OF SERVICE**

Jill N. Yeaman certifies that on the 18th day of November, 2019, on behalf of Minnesota Power, she efiled a true and correct copy of **Minnesota Power's Reply Comments on Completeness** via eDockets ([www.edockets.state.mn.us](http://www.edockets.state.mn.us)). Said document is also served via U.S. Mail or email as designated on the attached Service List on file with the Minnesota Public Utilities Commission in the above-referenced docket.

*/s/ Jill N. Yeaman*

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Jill N. Yeaman

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Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St  Grand Rapids, MN 55744	Paper Service	No	OFF_SL_19-442_Official GR-19-442
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St.  Bentonville, AR 72716-5530	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-442_Official GR-19-442
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave  Minneapolis, MN 55403	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Ron	Elwood	relwood@mnlsap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
John R.	Gasele	kgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417 Mountain Iron, MN 55768	Paper Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street  St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_19-442_Official GR-19-442
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Travis	Kolari	N/A	Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	OFF_SL_19-442_Official GR-19-442
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101  Two Harbors, MN 55616	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050  Boise, ID 83799-0050	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Tony	Mancuso	mancusot@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_19-442_Official GR-19-442
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442
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_19-442_Official GR-19-442
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street  Clouquet, MN 55720	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Herbert	Minke	hminke@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
James	Mortenson	james.mortenson@state.mn.us	Office of Administrative Hearings	PO BOX 64620  St. Paul, MN 55164-0620	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E  Park Rapids, MN 56470-1695	Paper Service	No	OFF_SL_19-442_Official GR-19-442
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661  Duluth, MN 55803	Electronic Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave  Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442
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_19-442_Official GR-19-442
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028  Pittsburgh, PA 15219	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street  Duluth, MN 55806	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Santi	Romani	N/A	United Taconite	P O Box 180  Eveleth, MN 55734	Paper Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street  Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd  Northfield, MN 55057	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street  Grand Rapids, MN 557442600	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
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_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	OFF_SL_19-442_Official GR-19-442
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	OFF_SL_19-442_Official GR-19-442

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Lori	Andresen	info@sosbluewaters.org	Save Our Sky Blue Waters	P.O. Box 3661  Duluth, Minnesota 55803	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Jessica L	Bayles	Jessica.Bayles@stoel.com	Stoel Rives LLP	1150 18th St NW Ste 325  Washington, DC 20036	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Sara	Bergan	sebergan@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Ingrid	Bjorklund	ingrid@bjorklundlaw.com	Bjorklund Law, PLLC	855 Village Center Drive #256  North Oaks, MN 55127	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
David F.	Boehm	dboehm@bkllawfirm.com	Boehm, Kurtz & Lowry	36 E 7th St Ste 1510  Cincinnati, OH 45202	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Elizabeth	Brama	ebrama@briggs.com	Briggs and Morgan	2200 IDS Center 80 South 8th Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Jon	Brekke	jbrekke@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael J.	Bull	mbull@mncee.org	Center for Energy and Environment	212 Third Ave N Ste 560 Minneapolis, MN 55401	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
David	Cartella	David.Cartella@cliffsnr.com	Cliffs Natural Resources Inc.	200 Public Square Ste 3300 Cleveland, OH 44114-2315	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Greg	Chandler	greg.chandler@upm.com	UPM Blandin Paper	115 SW First St Grand Rapids, MN 55744	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties
Steve W.	Chriss	Stephen.chriss@walmart.com	Wal-Mart	2001 SE 10th St. Bentonville, AR 72716-5530	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
John	Coffman	john@johncoffman.net	AARP	871 Tuxedo Blvd. St. Louis, MO 63119-2044	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_19-442_Potentially Interested Parties
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Lisa	Daniels	lisadaniels@windustry.org	Windustry	201 Ridgewood Ave Minneapolis, MN 55403	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Katie	Draper	Katie.Draper@millelacsband.com	Mille Lacs Band of Ojibwe	43408 Oodena Dr  Onamia, MN 56359	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101  Saint Paul, MN 55114	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Leonard	Fineday	Leonard.Fineday@llojibwe.org	Leech Lake Band of Ojibwe	190 Sailstar Drive NW  Leech Lake, MN 55663	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
John R.	Gasele	jpgasele@fryberger.com	Fryberger Buchanan Smith & Frederick PA	700 Lonsdale Building 302 W Superior St Ste 700 Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Barbara	Gervais	toftemn@boreal.org	Town of Tofte	P O Box 2293 7240 Tofte Park Road Tofte, MN 55615	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
J Drake	Hamilton	hamilton@fresh-energy.org	Fresh Energy	408 St Peter St  Saint Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Valerie	Herring	vherring@briggs.com	Briggs and Morgan, P.A.	2200 IDS Center 80 S. Eighth Street Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Rebekah	Howell	Rebekah.Howell@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 55164-0620	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
James	Jarvi	N/A	Minnesota Ore Operations - U S Steel	P O Box 417  Mountain Iron, MN 55768	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties
Alan	Jenkins	aj@jenkinsatlaw.com	Jenkins at Law	2265 Roswell Road Suite 100 Marietta, GA 30062	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Kelsey	Johnson	info@taconite.org	Iron Mining Association	324 West Superior St Ste 502  Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Sarah	Johnson Phillips	sarah.phillips@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Travis	Kolari	N/A	Keetac	PO Box 217  Keewatin, MN 55753	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Krikava	mkrikava@briggs.com	Briggs And Morgan, P.A.	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Becky	Lammi	cityclerk@ci.aurora.mn.us	City of Aurora	16 W 2nd Ave N PO Box 160 Aurora, MN 55705	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Carmel	Laney	carmel.laney@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
David	Langmo	david.langmo@sappi.com	Sappi North America	P O Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Emily	Larson	eLarson@duluthmn.gov	City of Duluth	411 W 1st St Rm 403  Duluth, MN 55802	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties
LeRoger	Lind	llind@yahoo.com	Save Lake Superior Association	P.O. Box 101  Two Harbors, MN 55616	Electronic Service	No	SPL_SL_19- 442_Potentially Interested Parties

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	SPL_SL_19-442_Potentially Interested Parties
Randy	Long	rlong@boisforte-nsn.gov	Bois Forte Band of Chippewa	5344 Lake Shore Drive  Nett Lake, MN 55772	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Patrick	Loupin	PatrickLoupin@Packaging Corp.com	Packaging Corporation of America	PO Box 990050  Boise, ID 83799-0050	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Philip	Mahowald	pmahowald@thejacobsonlawgroup.com	Jacobson Law Group	180 East Fifth Street Suite 940  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Sarah	Manchester	sarah.manchester@sappi.com	Sappi North American	255 State Street Floor 4 Boston, MA 02109-2617	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Tony	Mancuso	mancusot@stlouiscountymn.gov	Saint Louis County Property Mgmt Dept	Duluth Courthouse 100 N 5th Ave W Rm 515 Duluth, MN 55802-1209	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Joan	Markon	JoanMarkon@FDLREZ.COM	Fond du Lac Band of Lake Superior Chippewa	1720 Big Lake Road  Cloquet, MN 55720	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Keith	Matzdorf	keith.matzdorf@sappi.com	Sappi Fine Paper North America	PO Box 511 2201 Avenue B Cloquet, MN 55720	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
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	SPL_SL_19-442_Potentially Interested Parties
Matthew	McClincy	MMcClincy@usg.com	USG	35 Arch Street  Clouquet, MN 55720	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Natalie	McIntire	natalie.mcintire@gmail.com	Wind on the Wires	570 Asbury St Ste 201  Saint Paul, MN 55104-1850	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Kristin	Munsch	kmunsch@citizensutilityboard.org	Citizens Utility Board of Minnesota	309 W. Washington St. Ste. 800 Chicago, IL 60606	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

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Heidi	Nelson	Heidi.nelson@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Christopher J.	Oppitz	N/A	-	110 1/2 1ST ST E  Park Rapids, MN 56470-1695	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties
Elanne	Palcich	epalcich@cpinternet.com	Save Our Sky Blue Waters	P.O. Box 3661  Duluth, MN 55803	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Robert B	Peacock		Fond Du Lac Development Corp	105 University Road  Cloquet, MN 55702	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties
Max	Peters	maxp@cohasset-mn.com	City of Cohasset	305 NW First Ave  Cohasset, MN 55721	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

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Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Tolaver	Rapp	Tolaver.Rapp@cliffsnr.com	Cliffs Natural Resources	200 Public Square Suite 3400 Cleveland, OH 441142318	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail  Eagan, MN 55123	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
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	SPL_SL_19-442_Potentially Interested Parties
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Ralph	Riberich	rriberich@uss.com	United States Steel Corp	600 Grant St Ste 2028  Pittsburgh, PA 15219	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street  Duluth, MN 55806	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Santi	Romani	N/A	United Taconite	P O Box 180  Eveleth, MN 55734	Paper Service	No	SPL_SL_19-442_Potentially Interested Parties
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

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Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street  Wisconsin Rapids, WI 54495	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390  St. Paul, MN 55101	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd  Northfield, MN 55057	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Brett	Skyles	Brett.Skyles@co.itasca.mn.us	Itasca County	123 NE Fourth Street  Grand Rapids, MN 557442600	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Richard	Staffon	rcstaffon@msn.com	W. J. McCabe Chapter, Izaak Walton League of America	1405 Lawrence Road  Cloquet, Minnesota 55720	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	200 S 6th St Ste 470  Minneapolis, MN 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties

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Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Robert	Tammen	bobtammen@frontiernet.net	Wetland Action Group	PO Box 398 Soudan, MN 55782	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Jim	Tieberg	jtieberg@polymetmining.com	PolyMet Mining, Inc.	PO Box 475 County Highway 666 Hoyt Lakes, MN 55750	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Jessica	Tritsch	jessica.tritsch@sierraclub.org	Sierra Club	2327 E Franklin Ave Minneapolis, MN 55406	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Karen	Turnboom	karen.turnboom@versocom.com	Verso Corporation	100 Central Avenue Duluth, MN 55807	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Sara	Van Norman	sara@svn.legal	Van Norman Law, PLLC	1010 W Lake St Ste 100-130 Minneapolis, MN 55408	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Kodi	Verhalen	kverhalen@briggs.com	Briggs & Morgan	2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Kevin	Walli	kwalli@fryberger.com	Fryberger, Buchanan, Smith & Frederick	380 St. Peter St Ste 710 St. Paul, MN 55102	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_19-442_Potentially Interested Parties
Scott	Zahorik	scott.zahorik@aeoa.org	Arrowhead Economic Opportunity Agency	702 S. 3rd Avenue Virginia, MN 55792	Electronic Service	No	SPL_SL_19-442_Potentially Interested Parties