December 10, 2020
VIA E-FILING
Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

## Re: In the Matter of Petition for Approval of a Transmission Cost Recovery Rider under Minn. Stat. § 216B.16, subd. 7b. Docket No. E015/M-19-440 Compliance Filing

Dear Mr. Seuffert:
Minnesota Power (or the "Company") submits to the Minnesota Public Utilities Commission ("Commission") its compliance filing in the above-referenced Docket. The transmission-cost-recovery statute, Minn. Stat. § 216B.16, subd. 7b, authorizes a utility to recover the Minnesota jurisdictional costs for certain transmission-related costs through a rider. ${ }^{1}$ On July 9, 2019, the Company submitted its petition seeking Commission approval of Minnesota Power's 2019 rate adjustment mechanism under its Rider for Transmission Cost Recovery. On December 3, 2020, approximately 17 months after Minnesota Power submitted its petition, and seven months after the May 14, 2020 Commission hearing, the written order was finally issued.

This compliance filing addresses the requirements of Order Points 3, 4 and 6 of the December 3, 2020 Order which include:
3. The net credits it receives from MISO under Schedule 9 for Dog Lake and Great Northern Transmission Line;
4. A copy of FERC's (Federal Energy Regulatory Commission) audit report regarding Minnesota Power's transmission formula rates in this proceeding when it becomes available; and
6. Compliance tariffs reflecting the modifications adopted in this order.

As recommended by the Department of Commerce, Division of Energy Resources ${ }^{2}$ and approved by the Commission in its December 3, 2020 Order, the Company has included

[^0]Mr. Seuffert
the net credits it received from MISO (Midcontinent Independent System Operator) for other utilities' use of the Dog Lake and GNTL facilities in 2019. Refer to Revised Exhibit B-1, Page 3, and B-2, Page 2 in Attachment A.

On December 4, 2020, the final public FERC Audit Report from the recent FERC audit of Minnesota Power's wholesale transmission rates was issued. A copy of the public FERC Audit Report has been filed in this Docket.

Lastly, an updated clean and redline version of the tariff sheets are attached to this compliance filing as Attachment B.

Please contact me at (218) 355-3601 or lhoyum@mnpower.com if you have any questions regarding this filing.

Yours truly,


Lori Hoyum
Regulatory Compliance Administrator

LMH:th
Attach.

Minnesota Power
Transmission Cost Recovery Rider: 2019 Factor Filing Summary: Revenue Requirements, Cost Allocation and Rate Design

| Year-End 2018 Tracker Balance (\$) | Total |
| :--- | ---: |
| Jurisdiction | $3,035,043$ |
| Large Power | $3,697,909$ |
| All Other Classes | $(662,865)$ |

2019 Revenue Requirements (\$)
MN Jurisdiction
27,733,993
Large Power
All Other Classes

Total 2019 Factor Revenue Requirements (\$)

| MN Jurisdiction | $30,769,037$ |
| :--- | ---: |
| Large Power | $20,803,103$ |
| All Other Classes | $9,965,934$ |

Billing Units 1/

| Large Power | kW - month | 643,844 |
| :--- | :---: | ---: |
| All Other Classes | kWh | $5,477,317,000$ |


| Billing Factors 2l |  | Proposed |
| :--- | ---: | ---: |
| Large Power | $\$ / \mathrm{kW}-$ month | 1.51 |
|  | $\Phi / k W h$ | 0.167 |
| All Other Classes | $\$ / k W h$ | 0.318 |


|  |  | Current Rate |  |  | Proposed |  |  | Increase |  |
| :--- | ---: | ---: | ---: | ---: | ---: | :---: | :---: | :---: | :---: |
| Large Power | $(\$ / \mathrm{kW}-\mathrm{mo})$. | 0.67 | 1.51 | 0.84 |  |  |  |  |  |
|  | $(\$ / \mathrm{kWh})$ | 0.064 | 0.167 | 0.103 |  |  |  |  |  |
| All Other Classes | $(\$ / \mathrm{kWh})$ | 0.193 | 0.318 | 0.125 |  |  |  |  |  |

## Notes:

1/ 2019 Budget
2/ The LP rate design is a demand rate adder (\$/kW-month) and an energy adder ( $\$ / \mathrm{kWh}$ ). The LP allocated costs are to be split between demand and energy on the 2017 base rate demand and energy revenue split of approximately $56 \%$ demand and $44 \%$ energy per results of MP's most recent MPUC rate case (Docket No. E015/GR-16-664). All other retail classes will have an energy adder ( $\$ / \mathrm{kWh}$ ).

Minnesota Power
Transmission Cost Recovery Rider: 2019 Factor Filing
Tracker Summary

| Year-End 2014 Tracker Balance (\$) | Total |
| :---: | :---: |
| MN Jurisdiction | 12,241,038 |
| Large Power | 7,365,824 |
| All Other Classes | 4,875,214 |
| 2015 Revenue Requirements (\$) |  |
| MN Jurisdiction | 14,925,089 |
| Large Power | 9,329,672 |
| All Other Classes | 5,595,417 |
| Total 2015 Cash Collections (\$) |  |
| MN Jurisdiction | $(14,065,310)$ |
| Large Power | $(8,641,139)$ |
| All Other Classes | $(5,424,171)$ |
| Year-End 2015 Tracker Balance (\$) |  |
| MN Jurisdiction | 13,100,818 |
| Large Power | 8,054,357 |
| All Other Classes | 5,046,461 |
| 2016 Revenue Requirements (\$) |  |
| MN Jurisdiction | 18,454,198 |
| Large Power | 11,535,718 |
| All Other Classes | 6,918,481 |
| Total 2016 Cash Collections (\$) |  |
| MN Jurisdiction | $(22,909,703)$ |
| Large Power | $(13,339,829)$ |
| All Other Classes | $(9,569,873)$ |
| Year-End 2016 Tracker Balance (\$) |  |
| MN Jurisdiction | 8,645,313 |
| Large Power | 6,250,245 |
| All Other Classes | 2,395,068 |
| 2017 Continuing Rider Revenue Requirements (\$) |  |
| MN Jurisdiction | 9,125,288 |
| Large Power | 5,704,217 |
| All Other Classes | 3,421,071 |
| 2017 Continuing Rider Cash Collections (\$) |  |
| MN Jurisdiction | $(14,994,648)$ |
| Large Power | $(8,855,395)$ |
| All Other Classes | $(6,139,253)$ |
| Year-End 2017 Tracker Balance (\$) |  |
| MN Jurisdiction | 2,775,954 |
| Large Power | 3,099,067 |
| All Other Classes | $(323,113)$ |
| 2018 Continuing Rider Revenue Requirements (\$) |  |
| MN Jurisdiction | 14,931,174 |
| Large Power | 9,314,631 |
| All Other Classes | 5,616,543 |
| 2018 Continuing Rider Cash Collections (\$) |  |
| MN Jurisdiction | $(14,672,084)$ |
| Large Power | $(8,715,790)$ |
| All Other Classes | $(5,956,295)$ |
| Year-End 2018 Tracker Balance (\$) |  |
| MN Jurisdiction | 3,035,043 |
| Large Power | 3,697,909 |
| All Other Classes | $(662,865)$ |

Minnesota Power
2019 Transmission Cost Recovery Rider
Summary: MN Jurisdictional Revenue Requirements and Class Allocations

| M Jurisdictional Project Revenue Requirements (\$) | 2019 |
| :---: | :---: |
| ID \#108005 Dog Lake Substation Expansion | 243,856 |
| ID \#108035 115kV Dog Lake - Badoura Line \#40 | 3,757 |
| ID \#108547 Dog Lake Expansion - Line \#24 | 34,547 |
| ID \#108550 Dog Lake Expansion - Line \#155 | 57,838 |
| ID \#108985 Baxter 534 FDR Underbuild 115kV | 16,434 |
| Subtotal Dog Lake Project Revenue Requirements | 356,433 |
| ID \#105471 Great Northern Transmission Line | 14,672,351 |
| ID \#107621 Iron Range Substation | 2,036,688 |
| ID \#107623 Series Comp Station | 686,192 |
| ID \#107626 Blackberry Substation Modifications | 8,282 |
| ID \#107627 Arrowhead Substation Modifications | 3,049 |
| ID \#107628 Forbes Substation Modifications | 3,659 |
| ID \#107629 Hilltop Substation Modifications | 3,049 |
| ID \#110418 Black River Regen | 26,017 |
| ID \#110435 GNTL Togo Regen | 16,965 |
| ID \#110738 GNTL Salol Radio Project | 1,876 |
| ID \#110742 GNTL Williams Radio Project | 1,566 |
| ID \#110743 Baudette Radio Project | 1,934 |
| ID \#110744 GNTL Fairland Radio Project | 1,761 |
| ID \#110745 GNTL Margie Radio Project | 2,756 |
| ID \#110747 GNTL Effie Radio Project | 3,416 |
| ID \#110748 GNTL Marcell Radio Project | 1,414 |
| ID \#110751 GNTL Shannon Radio Project | 1,097 |
| ID \#110753 GNTL Blackberry Radio Project | 595 |
| ID \#110760 GNTL 115 kV Line 9 Mod | 7,883 |
| ID \#110761 GNTL 230 kV Line 93 | 27,399 |
| ID \#110764 GNTL 230 kV Line 98 | 67,422 |
| ID \#110766 GNTL 230 kV Line 105 | 21,867 |
| ID \#110767 GNTL 230 kV Line 106 | 51,862 |
| ID \#111173 GNTL Fairland MW Site - MTEP 3831 | 940 |
| ID \#111174 GNTL Salol MW Radio - MTEP 3831 | 2,148 |
| Subtotal GNTL Project Revenue Requirements | 17,652,189 |
| Estimated MH Payments (\$) |  |
| 6690271 Manitoba Ltd Payments /1 | - |
| MH Must Take Fee (133 MW) /2 | - |
| Subtotal MH Estimated Payments | - |
| Net RECB Revenue \& Expenses | 10,466,128 |
| Dog Lake Base Rate Revenue Credit | $(4,880)$ |
| MVP Project Credit | $(85,679)$ |
| Schedule 9 Dog Lake Revenue Credit | $(12,869)$ |
| Schedule 9 GNTL Revenue Credit | $(637,328)$ |

Total MN Jurisdictional Revenue Requirements (\$)

Allocation to Class
Total MN Jurisdictional Revenue Requirements
Large Power
All Other Classes

Alloc $3 /$

| 1.00000 | $27,733,993$ |
| :--- | :--- |
| 0.61676 | $17,105,194$ |
| 0.38324 | $10,628,799$ |

Notes:
1/ Estimated contract payment for ongoing operating expenses and property taxes attributed to the minority owner (49\%); taken from Finance model w/ Return on CWIP.
$2 /$ Estimated contract payment for revenue requirements and operating expenses attributed to the 133 MW (17.7\%) portion of the total project; taken from Finance model w/ Return on CWIP.
3/ Allocators from MP's 2016 MPUC rate case Docket No. E-015/GR-16-664.

2018 Tracker (Sum of All Projects)


2019 Tracker (Sum of All Projects)


## RIDER FOR TRANSMISSION COST RECOVERY

Applicable to electric service under all Company's Retail Rate Schedules except Competitive Rate Schedules 73 and 79. In addition, this Rider is applicable to service under Company's Rider for Large Power Interruptible Service and Rider for Large Power Incremental Production Service.

The following charges are applicable in addition to all charges for service being taken under Company's standard rate schedules:

Large Power Customers

All other applicable Retail Rate Customers
\$0.671.51-per kW-month for all Billing Demand kW
and
0.064167 ¢ per kWh for all kWh
0.1933184 per kWh for all kWh

## RIDER FOR TRANSMISSION COST RECOVERY

Applicable to electric service under all Company's Retail Rate Schedules except Competitive Rate Schedules 73 and 79. In addition, this Rider is applicable to service under Company's Rider for Large Power Interruptible Service and Rider for Large Power Incremental Production Service.

The following charges are applicable in addition to all charges for service being taken under Company's standard rate schedules:

Large Power Customers

All other applicable Retail Rate Customers
\$1.51 per kW-month for all Billing Demand kW
and
$0.167 \Phi$ per kWh
for all kWh
$0.318 \$$ per kWh
for all kWh

Filing Date July 9, 2019

Effective Date $\qquad$
MPUC Docket No. $\qquad$ January 1, 2021

Order Date $\qquad$

Approved by: David R. Moeller
David R. Moeller
Senior Attorney \& Director of Regulatory Compliance

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STATE OF MINNESOTA )
) ss

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the \(10^{\text {th }}\) day of December, 2020, she served Minnesota Power's Compliance Filing in Docket No. E015/M-19-440 on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.
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[^0]:    ${ }^{1}$ https://www.revisor.mn.gov/statutes/cite/216B.16.
    ${ }^{2}$ See Page 14 of May 5, 2020 Briefing Papers in Docket No. E015/M-19-440.

