

September 20, 2021

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
Saint Paul, Minnesota 55101-2147

RE: **Letter from the Minnesota Commerce Department, Division of Energy Resources**  
Docket No. E015/M-21-349

Dear Mr. Seuffert:

This letter is intended to clarify the resolution of clarifications requested by the Minnesota Commerce Department, Division of Energy Resources (Department) in initial comments filed on July 26, 2021 in Docket No. E015/M-21-349. In those comments, the Department requested that Minnesota Power (Company) clarify its reasoning behind the Company's statement that it will not request recovery of costs associated with its deferred accounting request in its upcoming rate case, and that Minnesota Power explain where and when it plans to recover the deferred costs addressed in the Petition filed May 21, 2021 in the instant docket.

On August 2, 2021, Minnesota Power filed reply comments stating that including costs associated with the deferred accounting request in the upcoming rate case would "split cost recovery between two rate cases" and would burden the upcoming rate case with another issue amidst many items and costs to evaluate.<sup>1</sup> In addition, the Company stated that it intends to "recover these costs in a future rate case once the pilot program has concluded."<sup>2</sup>

The Department appreciates the Company's clarification and has no further questions in this matter. Department staff are available to answer any questions the Commission may have.

Sincerely,

/s/ WILL NISSEN  
Public Utilities Rates Analyst

WN/ja

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<sup>1</sup> Reply Comments filed August 2, 2021 by Minnesota Power in Docket No. E015/M-21-239. Page 4.

<sup>2</sup> *Id.* Page 5.

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Letter**

**Docket No. E015/M-21-349**

**Dated this 20<sup>th</sup> day of September 2021**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_21-349_M-21-349
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_21-349_M-21-349
Jess	McCullough	jmccullough@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_21-349_M-21-349
David	Moeller	dmoeller@allte.com	Minnesota Power	30 W Superior St  Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-349_M-21-349
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_21-349_M-21-349
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_21-349_M-21-349