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November 2, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota
Docket No. E015/GR-16-664

Dear Mr. Wolf:

Enclosed for filing is the Application of Minnesota Power for Authority to Increase Rates for Electric Utility Service in Minnesota (“Application”). This Application is being filed with the Minnesota Public Utilities Commission (“Commission”) pursuant to Minn. Stat. § 216B.16, subd. 1.

Minnesota Power seeks authority to increase general rates by \$55,123,680, or 9.1 percent, over current rates, effective January 1, 2017. If the Commission elects to suspend the proposed rate increase pursuant to Minn. Stat. § 216B.16, subd. 2, pursuant to Minn. Stat. § 216B.16, subd. 3, Minnesota Power requests an interim rate increase of \$48,632,259, or 8.0 percent over current rates, to be effective January 1, 2017 with final rates effective within ten months of the date of the Application. Minnesota Power acknowledges that this period may be extended by 90 days pursuant to Minn. Stat. § 216B.16, subd. 2(f).

Minnesota Power’s Application is presented in five volumes as described below:

Volume I	Transmittal Letter Index Statement Regarding Trade Secret Information Summary of Filing Notice of Change in Rates Completeness Checklist Proposed Notice to Counties and Municipalities Proposed Newspaper Publication List of Counties and Cities Certificate of Service Service List
Volume II	Index Notice and Petition for Interim Rates Interim Rate Petition Schedules Interim Tariff Sheets – Redlined Interim Tariff Sheets – Clean Agreement and Undertaking Certification Proposed Notice to Customers
Volume III	Direct Testimony in Support of Change of Rates
Volume IV	Index Informational Requirements Tariff Pages – Redlined Tariff Pages – Clean
Volume V	Workpapers

Pursuant to Minn. R. 7825.2600, Subp. 2, Minnesota Power is also submitting a separate miscellaneous rate change Petition for Approval of a New Base Cost of Fuel and Purchased Energy in Docket No. E015/MR-16-709.

Please note that certain portions of the enclosed documents and exhibits contain non-public, trade secret information. Relevant pages containing non-public, trade secret information are designated as such. The index of non-public information attached to the Statement Regarding Trade Secret Information contained herein summarizes the documents and exhibits that have been designated as non-public and/or trade secret and the justification for that designation.

Minnesota Power appreciates the Commission's attention to this request, and looks forward to productive discussions with our stakeholders.

Sincerely,

A handwritten signature in black ink, appearing to read "David J. McMillan", written over a horizontal line.

David J. McMillan
Executive Vice President
Minnesota Power

Enclosures

cc: Official Service Lists

*In the Matter of the Application of Minnesota Power for Authority
to Increase Rates for Electric Utility Service in Minnesota*
Docket No. E015/GR-16-664

VOLUME I

**Notice of Change in Rates
Proposed Notices to Counties and Municipalities**

Transmittal Letter

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Statement Regarding Trade Secret Information

Summary of Filing

Notice of Change in Rates

Completeness Checklist

Proposed Notice to Counties and Municipalities

Proposed Newspaper Publication

List of Counties and Cities

Certificate of Service

Service List

STATEMENT REGARDING JUSTIFICATION FOR EXCISING TRADE SECRET INFORMATION

Pursuant to the Minnesota Public Utilities Commission's Revised Procedures for Handling Trade Secret and Privileged Data in furtherance of Minn. Stat. § 13.37 and Minn. Rule 7829.0500, Minnesota Power has designated portions of designated exhibits attached to the Application for Authority to Increase Rates for Electric Utility Service in Minnesota ("Application") as Trade Secret.

The Application consists of Minnesota Power's interim and general rate case filings and contains information regarding methods, techniques, and processes for obtaining and managing fuel supply resources for its generating facilities, including fuel supply, contract terms and conditions, as well as fuel cost projections. Designated exhibits to the Application also contain confidential financial, personnel, contractual, and energy procurement information that is materially sensitive and commercially valuable to Minnesota Power. Minnesota Power follows strict internal procedures to maintain the secrecy of all of this information in order to capitalize on the economic value of the information. As a result of public availability, Minnesota Power and its customers would suffer severe competitive implications, including a detrimental effect on energy costs paid by Minnesota Power's customers.

Minnesota Power believes that this statement and the attached Index of Non-Public Information Contained in Filing provide the justification as to why the information excised from the Application should remain a trade secret under Minn. Stat. § 13.37. The attached Index of Non-Public Information Contained in Filing summarizes the portions of the Application that have been designated as non-public and/or trade secret and the justification for that designation. Minnesota Power respectfully requests the opportunity to provide additional justification in the event of a challenge to the trade secret designation provided herein.

Index of Non-Public/Trade Secret Information Contained in Filing

Item/Location	Justification
Volume II	
Volume II, Interim Rates, Schedule B-4(IR)	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume II, Interim Rates, Schedule E-1(IR)	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume II, Interim Rates, Schedule E-2(IR)	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.

Item/Location	Justification
Volume II, Interim Rates Schedule G-8(IR)	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume III, Direct Testimony	
Volume III, Direct Testimony, Exhibit____(SWM), Schedule 2 – Minnesota Power Summary of Quantifiable Cost Controls and Savings	Certain information in this schedule has been designated as non-public, as it contains information Minnesota Power considers to be trade secret as it contains information about contractually-negotiated terms. To maintain our competitiveness in contract negotiations regarding these terms, Minnesota Power maintains the confidentiality of these data. Minnesota Power has taken reasonable precautions to maintain confidentiality and it is, therefore, trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b).
Volume III, Direct Testimony, Exhibit ____ (JJS), Schedule 2 – Summary of Generation Cost Control Measures	Certain information in this schedule has been designated as non-public, as it contains information Minnesota Power considers to be trade secret as it contains information about contractually-negotiated terms. To maintain our competitiveness in contract negotiations regarding these terms, Minnesota Power maintains the confidentiality of these data. Minnesota Power has taken reasonable precautions to maintain confidentiality and it is, therefore, trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b).

Item/Location	Justification
Volume III, Direct Testimony, Exhibit ____ (NRJ), Schedule 2, Minnesota Power’s 2016 Salary Benchmark Study	The compensation information contained in this schedule is highly confidential and is designated as trade secret information as defined by Minn. Stat. § 13.37, subd. 1(b), in that this information has not been publicly released. It also derives independent economic value from not being generally known to, and not being readily ascertainable by, other persons who can obtain economic value from its disclosure or use.
Volume III, Direct Testimony, Exhibit ____ (NRJ), Schedule 4, Excerpt from the 2015 Towers Watson Energy Services BENVAL Study, Volume III	This document has been designated as non-public in its entirety, as it contains information Minnesota Power considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information was purchased from Towers Watson, a third party, and derives independent economic value from not being generally known to, or readily ascertainable by, others who could obtain economic advantage from its disclosure or use.
Volume III, Direct Testimony, Exhibit ____ (JIP), Schedule 4 – Asset-Based Wholesale Sales 2010 to 2017 Test Year	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). This information has important economic value to Minnesota Power as a result of this information remaining not public, and Minnesota Power has taken reasonable precautions to maintain its confidentiality.
Volume III, Direct Testimony, Exhibit ____ (SJS), Schedule 2 – Summary of Marginal Energy Cost Study	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). This information has important economic value to Minnesota Power as a result of this information remaining not public, and Minnesota Power has taken reasonable precautions to maintain its confidentiality.

Item/Location	Justification
Volume III, Direct Testimony, Exhibit ____ (MAP), Schedule 3	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume III, Direct Testimony, Exhibit ____ (MAP), Schedule 5	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume IV	
Volume IV, General Rates, Schedule E-1	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.

Item/Location	Justification
Volume IV, General Rates, Schedule E-2	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume IV, General Rates, Schedule G-8	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume IV, General Rates, Schedule I – 5A – Ten Highest Paid Officers and Employees’ Compensation	Schedule I – 5A includes compensation information for the highest paid employees of the Company. Minn. Stat. § 216B.16, subdivision 17(c) allows for the salary of one or more of the ten highest paid officers and employees of Minnesota Power, other than the five highest paid, to be treated as private data on individuals. It also derives independent economic value from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.
Volume V	

Item/Location	Justification
Volume V, Cost of Capital, PLC-2, S&P Global Ratings for ALLETE 2016	This document has been designated as non-public in its entirety, as it contains information Minnesota Power considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information was purchased from S&P, a third party, and derives independent economic value from not being generally known to, or readily ascertainable by, others who could obtain economic advantage from its disclosure or use.
Volume V, Cost of Capital, PLC-3-S&P Corporate Methodology	This document has been designated as non-public in its entirety, as it contains information Minnesota Power considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information was purchased from S&P, a third party, and derives independent economic value from not being generally known to, or readily ascertainable by, others who could obtain economic advantage from its disclosure or use.
Volume V, Cost of Capital, PLC-4, Moody's Rating for ALLETE	This document has been designated as non-public in its entirety, as it contains information Minnesota Power considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information was purchased from Moody's, a third party, and derives independent economic value from not being generally known to, or readily ascertainable by, others who could obtain economic advantage from its disclosure or use.
Volume V, Cost of Capital, PLC-5, Moody's Rating Methodology	This document has been designated as non-public in its entirety, as it contains information Minnesota Power considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information was purchased from Moody's, a third party, and derives independent economic value from not being generally known to, or readily ascertainable by, others who could obtain economic advantage from its disclosure or use.

Item/Location	Justification
Volume V, ADJ-IS-24	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume V, ADJ-IS-28	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.
Volume V, ADJ-IS-30	The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.

Item/Location	Justification
Volume V, FC-1	<p>The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.</p> <p>In addition, the information contained in this schedule constitutes market data predictions Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). This information has important economic value to Minnesota Power as a result of this information remaining not public, and Minnesota Power has taken reasonable precautions to maintain its confidentiality.</p>
Volume V, AF-9	<p>The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.</p>

Item/Location	Justification
Volume V, AF-10	<p>The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.</p>
Volume V, AF-11	<p>The information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address or related usage) in this schedule consist of “private data on individuals” and “confidential customer data” as recognized under the Minnesota Data Practices Act. As such, any unique information that can identify an individual customer is maintained by the Company as not public data and protected from public disclosure.</p>

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

Docket No. E015/GR-16-664

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

SUMMARY OF FILING

On November 2, 2016, Minnesota Power filed with the Minnesota Public Utilities Commission (“Commission”) an Application to Increase Rates for Electric Utility Service in Minnesota (“Application”). Pursuant to Minn. Stat. § 216B.16, subd. 1, Minnesota Power requests a rate increase of \$55,123,680, or 9.1 percent, effective January 1, 2017, without suspension. If the Commission elects to suspend the proposed rate increase under Minn. Stat. § 216B.16, subd. 2, Minnesota Power requests, pursuant to Minn. Stat. § 216B.16, subd. 3, that an interim rate increase of \$48,632,259, or 8.0 percent, be effective on January 1, 2017, with final rates becoming effective within ten months of the date of the Application.

The average monthly impact of the proposed rate increase for residential customers with an average usage of 744 kilowatt hour will be approximately \$15 per month or \$180 annually. If the requested rates are suspended, the interim rates will increase the bill for a typical residential customer with average usage by approximately \$6 per month or \$72 annually. The impact on individual customers will be higher or lower depending on each customer’s actual electric consumption. Minnesota Power also proposes changes to its rate design and terms of service.

The proposed rate schedules and a comparison of present and proposed rates are available at www.mnpower.com/2016RateReview or at the Minnesota Department of Commerce, 85 Seventh Place East, Suite 500, St. Paul, Minnesota 55101. This filing is also available through the eDockets link on the website of the Commission at mn.gov/puc, under Docket Number E015/GR-16-664.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger	Chair
Nancy Lange	Commissioner
Dan Lipschultz	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

Docket No. E015/GR-16-664

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

NOTICE OF CHANGE IN RATES

A. Introduction

Minnesota Power seeks authority from the Minnesota Public Utilities Commission (“Commission”) to increase retail electric rates in Minnesota pursuant to Minn. Stat. § 216B.16 and Minn. R. 7825.3100-7825.4600 and 7829.2400. Minnesota Power requests a rate increase of \$55,123,680, or 9.1 percent, effective January 1, 2017 without suspension. If the Commission elects to suspend the proposed rate increase under Minn. Stat. § 216B.16, subd. 2, Minnesota Power requests, pursuant to Minn. Stat. § 216B.16, subd. 3, that an interim rate increase of \$48,632,259, or 8.0 percent, be effective on January 1, 2017, with final rates becoming effective within ten months of the date of the Application. Minnesota Power also proposes changes to its rate design and terms of service.

This Application includes the following information in accordance with Minnesota Statutes and the Commission’s rules:

**B. Notice and Proposal Regarding General Rate Change
(Minn. R. 7825.3200A(1) and 7825.3500)**

1. Name, address and telephone number of utility.

Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 722-2641

2. Name, address and telephone number of attorneys for the utility.

David R. Moeller
Senior Attorney
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3963

Elizabeth M. Brama
Valerie T. Herring
Kodi Jean Verhalen
Briggs and Morgan, P.A.
2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
(612) 977-8400

3. Date of filing and date modified rates are to be effective.

The date of this filing is November 2, 2016. Pursuant to Minn. Stat. § 216B.16, subd. 1, Minnesota Power respectfully requests that the overall rate increase it proposes become effective January 1, 2017, sixty (60) days after filing, without suspension. A schedule of rates and tariffs reflecting the revenue increase requested and the proposed rate design described in the attached documents is included with the Application.

If the Commission suspends the proposed rate increase under Minn. Stat. § 216B.16, subd. 2, Minnesota Power respectfully requests, pursuant to Minn. Stat. § 216B.16, subd. 3, that the Commission approve the interim rate increase proposed in the Petition for Interim Rates, which is filed as part of this Application, effective January 1, 2017, with final rates effective within ten months of the date of this Application.

4. Description and purpose of the change in rates requested.

The Application for a change in rates applies to all Minnesota Power retail customers in the State of Minnesota. The overall purpose of the proposed rate change is to produce the additional revenue necessary to meet Minnesota Power's cost of service for the test year ending

December 31, 2017. This filing complies with the provisions of Minn. Stat. § 216B.16 and the Commission's rules governing rate changes.

5. Effect of the change in rates.

The effect of the proposed rate increase will be an increase in gross revenues for the test year of \$55,123,680, or an approximate increase of 9.1 percent. The effect of the interim rates is a \$48,632,259, or 8.0 percent, overall increase over gross present rate revenues.

6. Signature and title of utility officer authorizing the proposal.

The Application is signed on behalf of Minnesota Power by David J. McMillan, Executive Vice President-Minnesota Power.

C. Modified Rates (Minn. R. 7825.3200A(2) and 7825.3600)

Included in this Application are rate schedules containing the proposed changed rates and tariffs. General rate schedules and tariffs are included in Volume IV of this Application and are supported by the Direct Testimony of Marcia Podratz, Director of Rates.

**D. Expert Opinions and Supporting Documents
(Minn. R. 7825.3200A(3) and 7825.3700)**

The statements of fact, expert opinions, and substantiating documents and exhibits supporting Minnesota Power's proposed change in rates accompany this Application. Pursuant to Minn. R. 7825.3700, David McMillan, Executive Vice President-Minnesota Power, provides Direct Testimony as Minnesota Power's designated official in support of the Application. A list of Minnesota Power's other witnesses is provided in Mr. McMillan's Direct Testimony.

**E. Information Requirements
(Minn. R. 7825.3200A(4) and 7825.3800 to 7825.4400)**

Included in this Application in Volume III are the Direct Testimonies of Minnesota Power's witnesses. Volumes II and IV contain the Company's interim and proposed general rate tariffs and Volume IV contains our Information Requirements. These volumes, along with Volume I as well as Volume V Workpapers, represent Minnesota Power's supporting

documentation and contain the information in support of the general rate increase required by Minn. R. 7825.3800 through Minn. R. 7825.4400.

Data are provided for the 2015 most recent fiscal year, the 2016 projected year, and the proposed test year ending December 31, 2017.

**F. Methods and Procedures for Refunding
(Minn. R. 7825.3200A(5) and 7825.3300)**

This Application is accompanied by an “Agreement and Undertaking” signed and verified by David McMillan, Executive Vice President-Minnesota Power, which commits Minnesota Power to make any refunds ordered by the Commission.

**G. Notice to Municipalities and Counties
(Minn. Stat. § 216B.16, subd. 1 and Minn. R. 7829.2400, Subp. 3)**

Pursuant to Minn. Stat. § 216B.16, subd. 1, Minnesota Power proposes to mail the Proposed Notice to Counties and Municipalities included with the Application to all municipalities and counties in Minnesota Power’s Minnesota electric service territory. This notice includes a discussion of the proposed interim rates, as well as information regarding the general electric rate case filing. Minnesota Power respectfully requests Commission approval of the notice so it may be mailed in a timely fashion.

**H. Customer Notice
(Minn. R. 7829.2400, Subp. 3)**

Minnesota Power will send a rate change notice to retail customers as a bill insert that explains the proposed general rate increase. If Minnesota Power’s requested retail electric rate increase is suspended, Minnesota Power will also explain the impact of its interim rates on customer bills in the same bill insert.

Included in this Application is an example of Minnesota Power’s proposed notice of its rate increase. Minnesota Power will work with Commission Staff to revise the notice as necessary so that Minnesota Power may insert the notices in the first bill a customer receives containing changed rates.

Minnesota Power will also publish public notice of the rate change in the newspapers of general circulation in all county seats in Minnesota Power's electric service territory. Included in this Application is an example of Minnesota Power's proposed newspaper notice. Minnesota Power will work with Commission Staff to revise the notice as necessary for prompt Commission approval. Minnesota Power intends to publish the newspaper notice within 30 days of Commission approval of the notice.

I. Filings Requiring Determination of Gross Revenue Requirement (Minn. R. 7829.2400)

Pursuant to Minn. R. 7829.2400, Minnesota Power submits the following information in addition to that required by Minn. R. 7825.3100 – 7825.4600.

1. Summary (Minn. R. 7829.2400, Subp. 1)

A summary of the Application is attached to this Notice.

2. Service; Proof of service (Minn. R. 7829.2400, Subp. 2)

Minnesota Power has served copies of the Application on the Department of Commerce, Division of Energy Resources and the Office of the Attorney General – Residential Utilities and Antitrust Division. Minnesota Power will serve a copy of the Summary of Filing on all parties on Minnesota Power's general service list and on the parties to Minnesota Power's last rate case proceeding (Docket No. E015/GR-09-1151). A certificate of service is attached.

3. Notice to public and governing bodies (Minn. R. 7829.2400, Subp. 3)

See Sections G and H above.

4. Notice of Hearing (Minn. R. 7829.2400, Subp. 7)

Minnesota Power will notify customers of hearings held in connection with this Application as directed by the Commission. Minnesota Power will also publish notice of the hearings in newspapers of general circulation in all county seats in Minnesota Power's electric service area, as directed by the Commission. *Please see* Section H above.

J. Request for Protection of Non-Public Information

Minnesota Power recognizes and supports the need for transparency in the review of its Application. A limited number of schedules and workpapers include Protected Data designated as Trade Secret or Non-Public information according to Minn. Stat. § 13.37, subd. 1(b) and Minn. R. 7829.0500. Minnesota Power has taken reasonable efforts to maintain the secrecy of this Protected Data, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.

Minnesota Power provides an index of non-public information contained in this filing with its Statement Regarding Justification for Excising Trade Secret Information, summarizing the documents and exhibits that have been designated as non-public and/or trade secret and the justification for that designation. Minnesota Power is filing complete Public and Non-Public versions of the portions of this Application that contain Trade Secret or Non-Public information.

K. Service List

Pursuant to Minn. R. 7829.0700, Minnesota Power respectfully requests the following persons representing Minnesota Power be placed on the Commission’s official service list for this proceeding:

David R. Moeller
Minnesota Power
30 West Superior Street
Duluth, MN 55802
dmoeller@allete.com

Marcia A. Podratz
Minnesota Power
30 West Superior Street
Duluth, MN 55802
mpodratz@mnpower.com

Elizabeth M. Brama
Briggs and Morgan, P.A.
2200 IDS Center
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ebrama@briggs.com
Valerie T. Herring
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2200 IDS Center
80 South 8th Street
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Kodi Jean Verhalen
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2200 IDS Center
80 South 8th Street
Minneapolis, MN 55402
kverhalen@briggs.com

L. Conclusion

Minnesota Power respectfully requests consideration and acceptance of its Application and the accompanying Notices to municipalities and counties, customers, and the public.

Dated: November 2, 2016

Respectfully submitted,



David J. McMillan
Executive Vice President-Minnesota Power
30 West Superior Street
Duluth, MN 55802
218-279-5000

Subscribed to before me
this 2nd day of November, 2016.



Notary Public



Source	Information Required	Section of Application
Minnesota Statutes and Rules		
7825.3500	Proposal for Change in Rates	
	The Utility's proposal for a change in rates shall summarize the notice of change in rates and shall include the following information:	Volume I, Notice of Change in Rates
(A)	name, address, and telephone number of the utility without abbreviation and the name and address and telephone number of the attorney for the utility, if there be one;	Volume I, Notice of Change in Rates
(B)	date of filing and date modified rates are effective;	Volume I, Notice of Change in Rates
(C)	description and purpose of the change in rates requested;	Volume I, Notice of Change in Rates
(D)	effect of the change in rates expressed in gross revenue dollars and as a percentage of test year gross revenue; and	Volume I, Notice of Change in Rates
(E)	signature and title of utility officer authorizing the proposal.	Volume I, Notice of Change in Rates
7829.2400	Filing requiring determination of gross revenue.	
Subpart 1	Summary. A utility filing a general rate case or other filing that requires determination of its gross revenue requirement shall include, on a separate page, a brief summary of the filing, sufficient to apprise potentially interested parties of its nature and general content.	Volume I. Summary of Filing
Subpart 2	Service. A utility filing a general rate change request shall serve copies of the filing on the department and the Office of the Attorney General. The utility shall serve the filing or the summary described in Subpart 1 on the persons on the applicable general service list and persons who were parties to its last general rate case or incentive plan proceeding.	Volume I, Notice of Change in Rates and Service List
Subpart 3	Notice to public and governing bodies. A utility seeking a general rate change shall give notice of the proposed change to the governing body of each municipality and county in its service area and to its ratepayers. The utility shall also publish notice of the proposed change in newspapers of general circulation in all county seats in its service area.	Volume I, Proposed Notice to Counties and Municipalities
7825.3300	Methods and Procedures for Refunding.	
	An unqualified agreement, signed by an authorized official of the utility, to refund to the customers or credit to customers' accounts within 90 days from the effective date of the commission order any portion of the increase in rates determined to be unreasonable together with interest at the average prime interest rate computed from the effective date of the proposed rates through the date of refund or credit.	Volume II, Agreement and Undertaking to Refund

Source	Information Required	Section of Application
7825.3600	Modified Rates	
	Revised or new pages to the rate book previously filed with the commission and by identifying those pages which were not changed. Each revised or new page of the rate book shall contain the revision number and the page number of the revised page.	Volume II, Interim Rates, Interim Rate Tariff Pages and Schedule G-9(IR) Volume IV, General Rates, Tariff Pages and Schedule G-9
7825.3700	Expert Opinions and Supporting Exhibits	
	Expert opinions and supporting exhibits shall include written statements, in question and answer format, together with supporting exhibits of utility personnel and other expert witnesses as denied appropriate by the utility in support of the proposal.	Volume III – All Witness Testimony
7825.3900	Jurisdictional Financial Summary Schedule	
	A jurisdictional financial summary schedule as required by part 7825.3800 shall be filed showing:	
(A)	the proposed rate base, operating income, overall rate of return, and the calculation of income requirements, income deficiency, and revenue requirements for the test year;	Volume II, Interim Rates, Schedule A-1(IR) Volume IV, General Rates, Schedule A-1
(B)	the actual unadjusted average rate base consisting of the same components as the proposed rate base, unadjusted operating income, overall rate of return, and the calculation of income requirements, income deficiency, and revenue requirements for the most recent fiscal year; and	Volume II, Interim Rates, Schedule A-1(IR) Volume IV, General Rates, Schedule A-1
(C)	the projected unadjusted average rate base consisting of the same components as the proposed rate base, unadjusted operating income under present rates, overall rate of return, and the calculation of income requirements, income deficiency, and revenue requirements for the projected fiscal year.	Volume II, Interim Rates, Schedule A-1(IR) Volume IV, General Rates, Schedule A-1
7825.4000	Rate Base Schedules	
	The following rate base schedules as required by part 7825.3800 shall be filed:	
(A)	A rate base summary schedule by major rate base component (e.g. plant in service, construction work in progress, and plant held for future use) showing the proposed rate base, the unadjusted average rate base for the most recent fiscal year and unadjusted average rate base for the projected fiscal year. The totals for this schedule shall agree with the rate base amounts included in the financial summary.	Volume II, Interim Rates, Schedule A-2(IR) Volume IV, General Rates, Schedule A-2

Source	Information Required	Section of Application
(B)	A comparison of total utility and Minnesota jurisdictional rate base amounts by detailed rate base component showing:	
(1)	total utility and the proposed jurisdictional rate base amounts for the test year including the adjustments, if any, used in determining the proposed rate base;	Volume II, Interim Rates, Schedule A-5(IR) Volume IV, General Rates, Schedule A-5
(2)	the unadjusted average total utility and jurisdictional rate base amounts for the most recent fiscal year and the projected fiscal year.	Volume II, Interim Rates, Schedule A-2(IR) Volume IV, General Rates, Schedule A-2
(C)	Adjustment schedules, if any, showing the title, purpose, and description and the summary calculations of each adjustment used in determining the proposed jurisdictional rate base.	Volume II, Interim Rates, Schedule A-5(IR) Volume IV, General Rates, Schedule A-5 Volume III, Direct Testimony of Marcia Podratz Volume V, Workpapers, ADJ-RB
(D)	A summary by rate base component of the assumptions made and the approaches used in determining average unadjusted rate base for the projected fiscal year. Such assumptions and approaches shall be identified and quantified into two categories: known changes from the most recent fiscal year and projected changes.	Volume II, Interim Rates, Schedules A-7(IR), B-1(IR), and B-2(IR) Volume IV, General Rates, Schedules A-7, B-5, and B-6
(E)	For multijurisdictional utilities only, a summary by rate base component of the jurisdictional allocation factors used in allocating the total utility rate base amounts to the Minnesota jurisdiction. This summary shall be supported by a schedule showing for each allocation factor the total utility and jurisdictional statistics used in determining the proposed rate base and the Minnesota jurisdictional rate base for the most recent fiscal year and the projected fiscal year.	Volume II, Interim Rates, Schedule B-5(IR) Volume IV, General Rates, Schedule B-4
7825.4100	Operating Income Schedules	
	The following operating income schedules as required by part 7825.3800 shall be filed:	
(A)	A summary schedule of jurisdictional operating income statements which reflect proposed test year operating income, and unadjusted jurisdictional operating income for the most recent fiscal year and the projected fiscal year calculated using present rates.	Volume II, Interim Rates, Schedule A-3(IR) Volume IV, General Rates, Schedule A-3

Source	Information Required	Section of Application
(B)	For multijurisdictional utilities only, a schedule showing the comparison of total utility and unadjusted jurisdictional operating income statement for the test year, for the most recent fiscal year and the projected fiscal year. In addition, the schedule shall provide the proposed adjustments, if any, to jurisdictional operating income for the test year together with the proposed operating income statement.	Volume II, Interim Rates, Schedules A-3(IR) and A-6(IR) Volume IV, General Rates, Schedules A-3 and A-6
(C)	For investor-owned utilities only, a summary schedule showing the computation of total utility and allocated Minnesota jurisdictional federal and state income tax expense and deferred income taxes for the test year, the most recent fiscal year, and the project fiscal year. This summary schedule shall be supported by a detailed schedule, showing the development of the combined federal and state income tax rates.	Volume IV, General Rates, Schedules H-1 and H-2
(D)	A summary schedule of adjustments, if any, to jurisdictional test year operating income and detailed schedules for each adjustment providing an adjustment title, purpose and description of the adjustment, and summary calculations.	Volume II, Interim Rates, Schedule A-6(IR) Volume III, Direct Testimony of Marcia Podratz Volume IV, General Rates, Schedule A-6 Volume V, Workpapers, ADJ-IS
(E)	A schedule summarizing the assumptions made and the approaches used in projecting each major element of operating income. Such assumptions and approaches shall be identified and quantified into two categories: known changes from the most recent fiscal year and projected changes.	Volume II, Interim Rates, Schedules A-7(IR), B-1(IR), and B-2 (IR) Volume IV, General Rates, Schedules A-7, B-5, and B-6
(F)	For multijurisdictional utilities only, a schedule providing, by operating income element, the factor or factors used in allocating total utility operating income to Minnesota jurisdiction. This schedule shall be supported by a schedule which sets forth the statistics used in determining each jurisdictional allocation factor for the test year, the most recent fiscal year, and the projected fiscal year.	Volume II, Interim Rates, Schedule B-5(IR) Volume IV, General Rates, Schedule B-4
7825.4200	Rate of Return Cost of Capital Schedules	
	The following rate of return cost of capital schedules as required by part 7825.3800 shall be filed:	

Source	Information Required	Section of Application
(A)	a rate of return cost of capital summary schedule showing the calculation of the weighted cost of capital using the proposed capital structure and the average capital structures for the most recent fiscal year and the projected fiscal year. This information shall be provided for the unconsolidated parent and subsidiary corporations, or for the consolidated parent corporation.	Volume II, Interim Rates, Schedule D-1(IR) Volume IV, General Rates, Schedule D-1 Volume V, Workpapers, Cost of Capital, PLC-1
(B)	supporting schedules showing the calculation of the embedded cost of long-term debt, if any, and the embedded cost of preferred stock, if any, at the end of the most recent fiscal year and the projected fiscal year.	Volume IV, General Rates, Schedule D-2
(C)	schedule showing average short-term securities for the proposed test year, most recent fiscal year, and the projected fiscal year.	N/A; <i>See</i> Volume III, Direct Testimony of Patrick Cutshall at Section IV(A)
7825.4300	Rate Structure and Design Information	
	The following rate structure and design information as required by part 7825.3800 shall be filed:	
(A)	A summary comparison of test year operating revenue under present and proposed rates by customer class of service showing the difference in revenue and the percentage change.	Volume II, Interim Rates, Schedule E-1(IR) Volume IV, General Rates, Schedule E-1
(B)	A detailed comparison of test year operating revenue under present and proposed rates by type of charge including minimum, demand, energy by block, gross receipts, automatic adjustments, and other charge categories within each rate schedule and within each customer class of service.	Volume II, Interim Rates, Schedules E-1(IR) and E-2(IR) Volume IV, General Rates, Schedules E-1 and E-2
(C)	A cost-of-service study by customer class of service, by geographic area, or other categorization as deemed appropriate for the change in rates requested, showing revenues, costs, and profitability for each class of service, geographic area, or other appropriate category, identifying the procedures and underlying rationale for cost and revenue allocations. Such study is appropriate whenever the utility proposed a change in rates which results in a material change in its rate structure.	Volume II, Interim Rates, Schedule C-1(IR) Volume IV, General Rates, Schedule C-1
7825.4400	Other Supplemental Information	
	The following supplemental information as required by part 7825.3800 shall be filed:	
(A)	Annual report to stockholders or members including financial statement and statistical supplements for the most recent fiscal year. If a utility is not audited by an independent public accountant, unaudited financial statements will satisfy this filing requirement.	Volume IV, General Rates, Schedule F

Source	Information Required	Section of Application
(B)	For investor-owned utilities only, a schedule showing the development of the gross revenue conversion factor.	Volume II, Interim Rates, Schedule G-7(IR) Volume IV, General Rates, Schedule G-7
(C)	For cooperatives only, REA Form 7, Financial and Statistical Report for the last month of the most recent fiscal year.	N/A
(D)	For cooperatives only, REA Form 7A, Annual Supplement to Financial and Statistical Report.	N/A
(E)	For REA cooperatives only, REA Form 325, Financial Forecast.	N/A
Minn. Stat. § 216B.16		
Subd. 1	If the filing utility does not have an approved energy conservation improvement plan on file with the department, it shall also include in its notice an energy conservation plan pursuant to section 216B.241	N/A
Subd. 17	(a) The commission may not allow as operating expenses a public utility's travel, entertainment, and related employee expenses that the commission deems unreasonable and unnecessary for the provision of utility service. In order to assist the commission in evaluating the travel, entertainment, and related employee expenses that may be allowed for ratemaking purposes, a public utility filing a general rate case petition shall include a schedule separately itemizing all travel, entertainment, and related employee expenses as specified by the commission, including but not limited to the following categories: (1) travel and lodging expenses; (2) food and beverage expenses; (3) recreational and entertainment expenses; (4) board of director-related expenses, including and separately itemizing all compensation and expense reimbursements; (5) expenses for the ten highest paid officers and employees, including and separately itemizing all compensation and expense reimbursements; (6) dues and expenses for memberships in organizations or clubs; (7) gift expenses; (8) expenses related to owned, leased, or chartered aircraft; and (9) lobbying expenses.	Volume III, Direct Testimony of Steven Morris at Section V Volume IV, General Rates, Schedule I

Source	Information Required	Section of Application
	<p>(b) To comply with the requirements of paragraph (a), each applicable expense incurred in the most recently completed fiscal year must be itemized, separately, and each itemization must include the date of the expense, the amount of the expense, the vendor name, and the business purpose of the expense. The separate itemization required by this paragraph may be provided using standard accounting reports already utilized by the utility involved in the rate case, in a written format or an electronic format that is acceptable to the commission. For expenses identified in response to paragraph (a), clauses (1) and (2), the utility shall disclose the total amounts for each expense category and provide separate itemization for those expenses incurred by or on behalf of any employee at the level of vice president or higher and for board members. The petitioning utility shall also provide a one-page summary of the total amounts for each expense category included in the petitioning utility's proposed test year.</p>	<p>Volume III, Direct Testimony of Steven Morris at Section V</p> <p>Volume IV, General Rates, Schedule I</p>
	<p>(c) Except as otherwise provided in this paragraph, data submitted to the commission under paragraph (a) are public data. The commission or an administrative law judge assigned to the case may treat the salary of one or more of the ten highest paid officers and employees, other than the five highest paid, as private data on individuals as defined in section 13.02, subdivision 12, or issue a protective order governing release of the salary, if the utility establishes that the competitive disadvantage to the utility that would result from release of the salary outweighs the public interest in access to the data. Access to the data by a government entity that is a party to the rate case must not be restricted.</p>	<p>Volume IV, General Rates, Schedule I-5A</p>
Commission Policy Statements		
Policy Statement		
Advertising	Statement that recovery is requested only for permitted advertisements.	<p>Volume II, Interim Rates, Schedule G-1(IR)</p> <p>Volume III, Direct Testimony of Marcia Podratz at Section V(A)10</p> <p>Volume IV, General Rates, Schedule G-1</p> <p>Volume V, Workpapers, Schedule ADJ-IS 14</p>

Source	Information Required	Section of Application
	Description of advertisements for which recovery is requested.	<p>Volume II, Interim Rates, Schedule G-1(IR)</p> <p>Volume III, Direct Testimony of Marcia Podratz at Section V(A)10</p> <p>Volume IV, General Rates, Schedule G-1</p> <p>Volume V, Workpapers, Schedule ADJ-IS-14</p>
	<p>Complete samples of all advertising for which recovery is requested, including a schedule that:</p> <ol style="list-style-type: none"> 1. Identifies the sample ad. 2. Categorizes the advertisements by allowable and disallowable type. 3. Defines the percentage by which the content fits into the allowable and disallowable statutory categories. 4. Provides the corresponding test year dollar amount for each ad. 5. Describes the period of time during which each ad will be used, the service area in which it will appear, and the media employed. 	<p>Volume II, Interim Rates, Schedule G-1(IR)</p> <p>Volume IV, General Rates, Schedule G-1</p> <p>Volume V, Workpapers, Schedule ADJ-IS 14</p>
Charitable Contributions	Evidence as to whether the recipients of the contributions serve the utility's Minnesota service area; are nondiscriminatory in selecting recipients; and do not promote political or special interest groups.	<p>Volume II, Interim Rates, Schedule G-2(IR)</p> <p>Volume III, Direct Testimony of Marcia Podratz at Section V(A)9</p> <p>Volume IV, General Rates, Schedule G-2</p>
	Evidence as to what organizations are gifted, their activities, and that no part of the contribution goes to benefit any private stockholder or individual.	<p>Volume II, Interim Rates, Schedule G-2(IR)</p> <p>Volume III, Direct Testimony of Marcia Podratz at Section V(A)9</p> <p>Volume IV, General Rates, Schedule G-2</p>
	Itemized schedule showing amount, recipient and time of donations.	<p>Volume II, Interim Rates, Schedule G-2(IR)</p> <p>Volume III, Direct Testimony of Marcia Podratz at Section V(A)9</p> <p>Volume IV, General Rates, Schedule G-2</p>

Source	Information Required	Section of Application
Organizational Dues	Schedule showing each organization claimed for ratemaking purposes, the number of employees for which membership dues are paid, and the corresponding dollar amount of dues.	Volume II, Interim Rates, Schedule G-3(IR) Volume IV, General Rates, Schedule G-3
	Testimony explaining whether the primary purpose of the organization is educating utility employees about providing improved utility service, training employees to become better qualified to provide improved utility service, or membership is a necessary qualification for employees to carry on their responsibilities or provides essential information to the utility	Volume III, Direct Testimony of Marcia Podratz at Section V(A)11 Volume IV, General Rates, Schedule G-3
Research Expenses	Schedule describing each research activity and itemizes and supports all expenses for each activity	Volume II, Interim Rates, Schedule G-4(IR) Volume IV, General Rates, Schedule G-4
	Testimony that explains the nature of control of the research, identifies who will conduct the research, describes who will benefit from the research and the time needed for those benefits to accrue, and who will acquire property rights to the products that result from the research.	Volume II, Interim Rates, Schedule G-4(IR) Volume IV, General Rates, Schedule G-4 Volume III, Direct Testimony of Marcia Podratz at Section V(A)21
Cash Working Capital	Lead/lag study with: 1) lead time divided into service to meter reading; meter reading to billing; and billing to collection; and 2) lag expenses divided into categories such as fuel, purchased power, labor, etc.	Volume II, Interim Rates, Schedule G-6(IR) Volume III, Direct Testimony of Marcia Podratz at Section IV(B)(8) Volume IV, General Rates, Schedule G-6
	Other issues may include average minimum cash balances required, depreciation, dividends and interest on debt.	Volume II, Interim Rates, Schedule G-6(IR) Volume III, Direct Testimony of Marcia Podratz at Section IV(B)(8) Volume IV, General Rates, Schedule G-6
Commission's Statement of Policy on Interim Rates Adopted April 14, 1982	http://mn.gov/puc-stat/documents/pdf_files/012031.pdf	
Page 2(1)	Name, address and telephone number of utility and attorneys.	Volume II, Petition for Interim Rates
Page 2(2)	Date of filing and date proposed interim rates are requested to become effective.	Volume II, Petition for Interim Rates

Source	Information Required	Section of Application
Page 2(3)	Description and need for interim rates.	Volume II, Petition for Interim Rates
Page 2(4)	Description and corresponding dollar amount change included in interim rates as compared with most current approved general rate case and with the most recent year for which audited data is available.	Volume II, Petition for Interim Rates Volume II, Schedule A-1(IR)
Page 2(5)	Effect of the interim rates expressed in gross revenue dollars and as a percentage of test year gross revenues.	Volume II, Petition for Interim Rates
Page 2(6)	Certification by officer of the utility.	Volume II, Petition for Interim Rates
Page 3(7)	Signature and title of the utility officer authorizing the proposed interim rates.	Volume II, Petition for Interim Rates
Page 3(1)	A schedule showing the interim rate of return calculation.	Volume II, Interim Rates Schedule D-1(IR)
Page 3(2)	A schedule showing the interim operating income statement.	Volume II, Interim Rates, Schedule A-4(IR)
Page 3(3)	A schedule showing the interim proposed rate base.	Volume II, Interim Rates, Schedule A-5(IR)
Page 4(4)	A schedule showing revenue deficiency calculations for each of the operating income statements and rate bases requested in (2) and (3) above. The revenue deficiency should be calculated for the actual data and the interim data using the rate of return calculated in (1) above.	Volume II, Interim Rates, Schedule A-1(IR)
	Modified Tariffs	Volume II, Interim Rates, Clean and Redlined Tariffs
	Notices	Volume II, Interim Rates, Proposed Notice to Customers
All Utility Dockets		
E999/CI-03-869	In the Matter of Detailing Criteria and Standards for Measuring an Electric Utility's Good Faith Efforts in Meeting the Renewable Energy Objectives Under Minn. Stat. § 216B.1691	
E999/CI-04-1616	In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits	
ORDER ESTABLISHING INITIAL PROTOCOLS FOR TRADING RENEWABLE ENERGY CREDITS (DEC. 18, 2007)	Utilities seeking recovery of prudent costs related to registration, annual fees and transaction costs related to renewable energy credit purchases shall file specific proposals for cost recovery, to be reviewed by the Department and other parties.	Volume III, Direct Testimony of Julie Pierce, Section VII.
E,G999/CI-08-132	In the Matter of a Commission Investigation into the Establishment of Criteria and Standards for the Decoupling of Energy Sales from Revenues	
ORDER ESTABLISHING CRITERIA AND STANDARDS TO BE UTILIZED IN PILOT PROPOSALS FOR REVENUE DECOUPLING (JUNE 19, 2009)	[If a utility seeks Commission approval for a pilot decoupling proposal,] decoupling pilot proposals should be filed and implemented within a rate case.	Minnesota Power has not included any proposal for decoupling in this rate filing.

Source	Information Required	Section of Application
E,G999/CI-13-626	In the Matter of a Commission Inquiry into Decommissioning Policies Related to Depreciation	
ORDER PROHIBITING USE OF DECOMMISSIONING PROBABILITIES TO CALCULATE THE SALVAGE PORTION OF DEPRECIATION EXPENSES (OCT. 26, 2015)		
Order Point 1	Utilities shall stop using decommissioning probabilities in determining the salvage portion of depreciation expense.	Volume III, Direct Testimony of Steven Morris at Section VI
Order Point 3	Minnesota Power shall stop using decommissioning probabilities starting in its next general rate case, or as of January 1, 2020, if it has not filed a general rate case by that date.	Volume III, Direct Testimony of Steven Morris at Section VI
E999-AA-09-961	In the Matter of the Review of the 2008-2009 Annual Automatic Adjustment Reports for All Electric Utilities	
ORDER ACTING ON ELECTRIC UTILITIES' ANNUAL REPORTS AND REQUIRING ADDITIONAL FILINGS (APR. 6, 2012)	The Commission will require the utilities to continue to show benefits of the MISO Day 1 in their rate cases before receiving cost recovery of MISO Schedule 10 costs.	Volume III, Direct Testimony of Christopher Fleege at Section VI(B)
E999/AA-10-884	In the Matter of the Review of the 2009-2010 Annual Automatic Adjustment Reports for All Electric Utilities	
ORDER ACTING ON ELECTRIC UTILITIES' ANNUAL REPORTS AND REQUIRING ADDITIONAL FILINGS (APR. 6, 2012)	The Commission will require the utilities to continue to show benefits of MISO Day 1 in their rate cases before receiving cost recovery of MISO Schedule 10 costs.	Volume III, Direct Testimony of Christopher Fleege at Section VI(B)
Minnesota Power Dockets		
E015/AI-08-339	In the Matter of Minnesota Power's Petition for Approval of an Administrative Services Agreement between ALLETE, Inc. and its Subsidiary, ALLETE Properties, LLC (f/k/a MP Real Estate Holdings, Inc.)	
E015/AI-08-340	In the Matter of Minnesota Power's Petition for Approval of an Administrative Services Agreement Between ALLETE, Inc. and its Subsidiary, Superior Water, Light and Power (SWL&P)	
E015/AI-08-341	In the Matter of Minnesota Power's Petition for Approval of an Administrative Services Agreement Between ALLETE, Inc. and its Subsidiary, Minnesota Power Enterprises, Inc. (MP Enterprises)	
ORDER (JAN. 13, 2009)	The Company must demonstrate in future rate cases that the First Amendment to the Services Agreement has not resulted in cross-subsidization by Minnesota Power's ratepayers of the activities of its affiliated companies.	Volume III, Direct Testimony of Steven Morris at Section IV

Source	Information Required	Section of Application
E015/PA-08-928	In the Matter of a Petition for Approval of a Redevelopment Agreement for the M.L. Hibbard Units 3 & 4 Boilers and Related Facilities from the City of Duluth and for Approval of Investments and Expenditures at the M.L. Hibbard Energy Center Through Minnesota Power's Renewable Energy Rider under Minn. Stat. § 216B.1645	
ORDER APPROVING PURCHASE AND MAKING FINDINGS RELEVANT TO RECOVERY OF UPGRADE EXPENDITURES THROUGH THE RENEWABLE ENERGY RIDER (SEPT. 22, 2009)		
Order Point 4(a)	MP shall address, in the first rate case after Hibbard goes into service and in all subsequent rate cases until the Commission orders otherwise, whether the Hibbard facility is used and useful in providing retail utility service and whether the investments and related expenses and revenues are reasonable and prudently incurred.	Volume III, Direct Testimony of Joshua Skelton at Section IV
Order Point 4(j)	In the first rate case filed with a test year in which the upgrades to the Hibbard plant are in service, MP shall include testimony and supporting schedules on how costs included in the rider could be incorporated into base rates, including the effects on rate base and the income statement, the class cost of service study, and class revenue allocation.	Volume III, Direct Testimony of Josh Skelton, Section IV
Order Point 4(o)	MP shall credit the revenues MP receives from NewPage under the steam agreement to ratepayers in the next rate case or through the rider, whichever occurs first.	Volume III, Direct Testimony of Marcia Podratz at Section V(C) and Exhibit__(MAP), Schedule 4, p. 1, line 48
E015/M-09-285	In the Matter of the Petition of Minnesota Power for Approval of Investments and Expenditures in the Bison I Wind Project for Recovery through Minnesota Power's Renewable Resources Rider Under Minn. Stat. Section 216B.1645.	
ORDER (JULY 7, 2009)	Require Minnesota Power to file a complete information, when filing its renewable rider, explaining any cost deviation from the costs approved in this docket. If there are any overages, the Company shall address them in its next rate case.	Volume III, Direct Testimony of Joshua Skelton at Section IV
E015/GR-09-1151	In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota	
FINDINGS OF FACT, CONCLUSIONS, AND ORDER (NOV. 2, 2010)		

Source	Information Required	Section of Application
Page 45	If the Company acquires forecast-related data from third parties and subsequently relies on that data to make its sales forecasts in its next rate case, the Company must be prepared to provide verification of that data in response to requests by the parties.	Volume III, Direct Testimony of Julie Pierce, Section I
Order Point 8	The Company shall amortize the rate case expenses authorized for recovery herein over a three-year period and shall defer amounts recovered for rate case expense after the three-year amortization period for consideration in the Company's next rate case.	Volume III, Direct Testimony of Marcia Podratz at Section V(A)15
Order Point 11	In its next rate case filing, the Company shall address and provide testimony on the issue of whether it is reasonable for ratepayers to continue to bear the costs of Other Post-Employment Benefits expenses.	Volume III, Direct Testimony of Nicole Johnson at Section V(C)
Order Point 12	In its next rate case filing, the Company shall provide (a) a list showing, for every non-bargaining employee, the employee's job title/position, base salary, bonus and incentives, and other compensation; and (b) salary surveys and analyses linking each listed employee with employees holding comparable positions in other businesses.	Volume III, Direct Testimony of Nicole Johnson at Section III(D) and Exhibit ___ (NRJ), Schedule 2
	<i>Clarified by Feb. 4, 2011 Order:</i> should not be limited to utility-industry positions and salaries.	Volume III, Direct Testimony of Nicole Johnson at Section III(D) and Exhibit ___ (NRJ), Schedule 2
Order Point 13	In its next rate case filing, the Company shall include an itemized schedule of employee recognition expenses with the other itemized schedules required under Minn. Stat. § 216B.16, subd. 17.	Volume III, Direct Testimony of Steven Morris at Section V(C). Recognition expenses excluded except safety and years of service awards included in Volume IV, General Rates, Schedule I-7.
Order Point 14	In its next rate case filing, the Company shall include a cost/benefit analysis of the use of corporate aircraft.	Volume III, Direct Testimony of Steven Morris, Section V(A).
Order Point 15	In its next rate case filing, the Company shall provide testimony about its efforts to control costs. It shall list all cost reductions made, state which cost reductions are permanent, and quantify total cost savings.	Volume III, Direct Testimony of Steven Morris at Section III and Exhibit ___ (SWM), Schedule 2; Nicole Johnson at Section II(A) and Exhibit ___ (NRJ), Schedule 1; Joshua Skelton at Section VI and Exhibit ___ (JJS), Schedule 2; and Christopher Fleege at Section VII and Exhibit ___ (CEF), Schedule 6

Source	Information Required	Section of Application
Order Point 16	The Company shall develop written policies on including in rates the costs of employee travel, lodging, and meal expenses and shall implement an employee expense compliance plan to ensure that these policies are followed. The Company shall report on these efforts in its next rate case filing.	Volume III, Direct Testimony of Steven Morris at Section V
Order Point 17.	The Company shall account for future lobbying expenses by assigning both employee and contract lobbying expenses to FERC Account 426.4 and excluding this category from operating and maintenance expenses recovered from ratepayers.	Volume III, Direct Testimony of Steven Morris at Section V; Direct Testimony of Marcia Podratz at Section V(A)13
Order Point 18	The Company shall continue working with the [Division of Energy Resources] on improving the electronic linkage between its Class Cost of Service Study, its forecasting processes, and its revenue models.	Volume III, Direct Testimony of Marcia Podratz at XI
Order Point 19	In future rate case filings, the Company shall provide all data used in its test year sales forecasts at least 30 days before filing the rate case.	Data submitted September 30, 2016
Order Point 20	In future rate case filings, the Company shall conduct any Class Cost of Service Study (CCOSS) by calculating and assigning income taxes by class based on the adjusted net taxable income by class as determined by the CCOSS.	Volume III, Direct Testimony of Stewart Shimmin at Section II.
Order Point 21	In its next rate case filing, the Company shall provide a description and an explanation of each classification and allocation method used in its CCOSS and justify why that method is appropriate and superior to alternative methods considered.	Volume III, Direct Testimony of Stewart Shimmin at Section II.
Order Point 22	In its next rate case filing, the Company shall provide a marginal energy cost study.	Volume III, Direct Testimony of Stewart Shimmin at Section II and Exhibit ___ (SJS), Schedule 2
Order Point 23	Minnesota Power shall start a new load research study by the end of 2011.	Volume III, Direct Testimony of Stewart Shimmin at Section II.
Order Point 24	Within 30 days of the date of this order, the Company shall develop and propose a time-of-use tariff for the Large Light and Power customer class.	Volume III, Direct Testimony of Marcia Podratz at Section XII(E)
Order Point 25	Within 90 days of the date of this order, the Company shall develop and propose a program to address the needs of low-income, high-usage residential customers modeled on Xcel's program, including its Power On program. This program shall include regular compliance reports similar to those Xcel is required to make as part of its electric utility's low income discount program.	Volume III, Direct Testimony of Marcia Podratz at Section XII(A)
Order Point 26	In its next rate case filing, the Company shall recommend whether to continue the pilot Residential General service rate design.	Volume III, Direct Testimony of Marcia Podratz at Section XII(A)

Source	Information Required	Section of Application
E015/M-11-234	In the Matter of the Petition of Minnesota Power for Approval of Investment and Expenditure in the Bison 2 Wind Project Pursuant to Minn. Stat. § 126B.1645	
ORDER (SEPT. 8, 2011)	The Company will have the opportunity to seek recovery of other costs [beyond the initial estimates in this petition] on a prospective basis (no deferred accounting) in a subsequent rate case.	Volume III, Direct Testimony of Joshua Skelton at Section IV(C)
E015/M-11-626	In the Matter of the Petition by Minnesota Power for Approval of Investments and Expenditures in the Bison 3 Wind	
ORDER (NOV. 2, 2011)	The Company will have the opportunity to seek recovery of other costs [beyond the initial estimates in this petition] on a prospective basis, with no deferred accounting, in a subsequent rate case.	Volume III, Direct Testimony of Joshua Skelton at Section IV(C)
E015/M-10-1083	In the Matter of Minnesota Power's Petition for Approval to Defer the Tax Impact of the Patient Protection and Affordable Care Act on Medicare Part D Subsidies	
ORDER DEFERRING ISSUE AND REQUIRING DETAILED ACCOUNTING (MAY 24, 2011)	Minnesota Power shall upon requesting cost recovery in its next rate case filing, provide a detailed accounting of the effects of the Patient Protection and Affordable Care Act (PPACA) including:	Volume III, Direct Testimony of Jamie Jago at Section IV and Nicole Johnson at Section IV(A)
	(a) dates and full description of any and all changes in benefit plans due to any aspect of the PPACA;	Volume III, Direct Testimony of Nicole Johnson at Section IV(A)
	(b) changes in benefit and costs due to any aspect of the PPACA;	Volume III, Direct Testimony of Nicole Johnson at Section IV(A)
	(c) identification of any and all changes in taxes due to any aspect of the PPACA or due to the PPACA as a whole;	Volume III, Direct Testimony of Jamie Jago at Section IV and Nicole Johnson at Section IV(A)
	(d) any sources of revenue due to the PPACA;	Volume III, Direct Testimony of Nicole Johnson at Section IV(A)
	(e) identification of any other changes in costs due to the PPACA.	Volume III, Direct Testimony of Nicole Johnson at Section IV(A)
E015/AI-11-868	In the Matter of Minnesota Power's Petition for Approval of Affiliated Interests Between ALLETE, Inc. and ALLETE Clean Energy	
ORDER APPROVING LEASE AGREEMENT AND SALE OF METEOROLOGICAL TOWERS AND REQUIRING ANNUAL COMPLIANCE REPORT (JULY 23, 2012)	The Lease agreement between ALLETE, Inc. and ALLETE Clean Energy for office space contained in the affiliate interest transaction is consistent with the public interest, and the Commission so approves, recognizing that: . . . (B) Minnesota Power is required to reflect these lease payments in its next rate case.	Volume III, Direct Testimony of Steven Morris at Section IV
E015/M-12-1359 E015/M-95-1441	In the Matter of a Request by Minnesota Power for a Modification of its Service Extension Tariff	
ORDER MODIFYING SERVICE EXTENSION TARIFFS AND REQUIRING TARIFFS AND REQUIRING FURTHER FILINGS (OCT. 7, 2013)	In its next rate case filing, Minnesota Power shall include a fully embedded, average cost study of service-extension costs by customer class and by single-phase and three-phase service.	Volume III, Direct Testimony of Marcia Podratz at Section XII(R) and Exhibit__(MAP), Schedule 14.

Source	Information Required	Section of Application
E015-AI-15-712	In the Matter of Minnesota Power’s (MP’s) Petition for Approval of Affiliate Interests Between ALLETE, Inc. and ALLETE Clean Energy (ACE) – New Lease Agreement	
ORDER (JAN. 14, 2016)	Required MP to provide the following in MP’s next rate case: Background on Investor Relations and Board of Directors costs, including categories of types of costs, basis for the categories of costs, amounts of costs by category, how costs are allocated between shareholders and ratepayers and why the allocation is reasonable. For any costs (besides Investor Relations and Board of Directors) that MP continues to allocation using its “Corporate Equity” allocator, MP should provide support that these costs cannot be directly assigned and cannot be allocated using an indirect cost causative allocator. Additionally, MP should explain and support why the Commission’s general allocator of “Expenses less purchased goods sold” is not used, including why the Company’s “Corporate Equity” allocator is a superior allocator and does not harm ratepayers.	Volume III, Direct Testimony of Steven Morris at Section IV

NOTICE TO COUNTIES AND MUNICIPALITIES

Under Minn. Stat. § 216B.16, Subd. 1

On XXXX XX, 20XX, the Minnesota Public Utilities Commission (“Commission”) accepted as of XXXX XX, 2016 Minnesota Power's application for a general increase in rates for electric service provided to customers in the State of Minnesota of approximately \$55.1 million, or about 9 percent, pursuant to Minn. Stat. § 216B.16.

In accordance with Minn. Stat. § 216B.16, subd. 2, the Commission has suspended proposed final rates to allow the Commission time to evaluate the application. In accordance with Minn. Stat. § 216B.16, subd. 3, the Commission has authorized a total interim rate increase of approximately \$48.6 million or about 8 percent to be effective XXXX XX, 2017. During this interim period, Minnesota Power electric customers’ bills will be approximately 8 percent higher depending on service class, and the rates will remain in effect until a final rate level is determined.

Examples of the effect of these increases on typical bills are as follows:

Proposed change in monthly electricity costs¹

Customer classification	Avg. monthly kWh usage	Previous monthly costs	Proposed interim monthly increase	Proposed final monthly increase
Residential	744	\$77	\$6	\$15
Residential CARE	778	\$62	\$5	\$14
Residential Dual Fuel	1,119	\$96	\$7	\$10
General Service	2,670	\$283	\$22	\$28
Commercial & Industrial Dual Fuel	4,278	\$345	\$26	\$38
Municipal Pumping	6,220	\$639	\$49	\$67
Large Light and Power	297,246	\$23,958	\$1,821	\$2,235
Large Power	50,916,417	\$3,362,486	\$248,747	\$226,009
Street and Area Lighting	364	\$59	\$5	\$0

¹ Monthly increases include all line items on bills except sales taxes and municipal franchise fees, and may vary by individual customer based on usage characteristics.

*The rate levels upon which the previous monthly costs are based were authorized in Docket No. E-015/GR-09-1151.

The Commission will determine the amount of increase in rates it will allow by year-end 2017, and final rates reflecting that determination will be implemented thereafter. If the final rate level is less than the interim rate level, the amount collected during the interim period attributable to that difference will be refunded to customers with interest.

The proposed rate schedules and a comparison of present and proposed rates may be examined by the public during normal business hours at the Minnesota Department of Commerce, 85 7th Place East, Suite 500, St. Paul, MN 55101, Telephone: 651-296-4026, TTY: 651-297-3067; and at the Minnesota Power office located at 30 West Superior Street, Duluth, Minnesota 55802. It is also available on the Internet at:

Minnesota Power Web site: www.mnpower.com;
 Commission Web site: www.mn.gov/puc
 Docket Number E-015/GR-16-664.

The Minnesota Department of Commerce, among other parties, will review Minnesota Power's books and records in this proceeding.

An Administrative Law Judge will schedule public hearings. Customers will be notified when the hearings are scheduled. Public notice of hearings dates and locations will be published in local newspapers in Minnesota Power's service area.

Persons who wish to formally intervene or testify in this case should contact the Administrative Law Judge, Minnesota Office of Administrative Hearings, 600 North Robert St., St. Paul, MN 55101.



RATE INCREASE NOTICE

XXXX 2017

AN ALLETE COMPANY

Minnesota Power has asked the Minnesota Public Utilities Commission (MPUC) for permission to increase its electric rates by approximately \$55.1 million, or about 9 percent overall. Depending on customer class and usage, the actual percent will vary based upon final approval by the MPUC. The MPUC will make its decision regarding final rates late 2017.

Public Comment

Administrative Law Judge _____ has scheduled public hearings so that customers may have an opportunity to present their views regarding Minnesota Power's recently filed retail rate case (MPUC Docket No. E-015/GR-16-664 and OAH Docket No. _____). Any Minnesota Power customer or other person may attend or provide comments at the hearings. You are invited to comment on the adequacy and quality of Minnesota Power's service, the level of rates or other related matters. You do not need to be represented by an attorney.

Public Hearings Schedule

DATE	DATE
Location	Location

DATE	DATE
Location	Location

Written comments may be sent to Administrative Law Judge _____, Office of Administrative Hearings, PO Box 64620, St. Paul, MN 55164-0620 or by email to _____@state.mn.us. Written comments are most effective when they include: 1) the section of Minnesota Power's proposal you are addressing, 2) your specific recommendations, 3) the reason for your recommendations, 4) Docket No. OAH _____ and MPUC E015/GR-16-664. Comments must be received by xxx,xx,20xx.

Important: Comments will be made available to the public on the Commission's Web site, except in limited circumstances consistent with the Minnesota Government Data Practices Act. The Commission does not edit or delete personal identifying information from submissions.

Accommodations

If you need any reasonable accommodation to enable you to fully participate in these public hearings (i.e., sign language or foreign language interpreter, wheelchair accessibility, or large-print materials please contact the MPUC at 651-201-2202 or 800-657-3782 one week in advance of the hearing.

Evidentiary Hearings

Formal evidentiary hearings on Minnesota Power's proposal are scheduled to start on xxx,xx,20xx, at xx:xx x.m., in the Large Hearing Room, Minnesota Public Utilities Commission, 121 Seventh Place East, Suite 350, St. Paul, MN. The purpose of the evidentiary hearings is to allow Minnesota Power, the Minnesota Department of Commerce—Division of Energy Resources, the Office of Attorney General—Residential Utilities and Antitrust Division and others to present testimony and to cross-examine each other's witnesses on the proposed rate increase.

Anyone who wishes to formally intervene in this case should contact the Administrative Law Judge, _____, at the Office of Administrative Hearings, PO Box 64620, St. Paul, MN 55164-0620 or by email to _____@state.mn.us.

Effect of Rate Changes

Below are examples of the effect of the proposed increase on typical bills of Minnesota Power's customers. Individual changes may be higher or lower depending on actual electricity usage.

Customer classification	Avg. monthly kWh usage	Previous monthly costs	Proposed interim monthly increase	Proposed final monthly increase
Residential	744	\$77	\$6	\$15
Residential CARE	778	\$62	\$5	\$14
Residential Dual Fuel	1,119	\$96	\$7	\$10
General Service	2,670	\$283	\$22	\$28
Commercial & Industrial Dual Fuel	4,278	\$345	\$26	\$38
Municipal Pumping	6,220	\$639	\$49	\$67
Large Light and Power	297,246	\$23,958	\$1,821	\$2,235
Large Power	50,916,417	\$3,362,486	\$248,747	\$226,009
Street and Area Lighting	364	\$59	\$5	\$0

*Monthly increases include all line items on bills except sales taxes and municipal franchise fees, and may vary by customer based on usage.

The rate changes described in this notice have been requested by Minnesota Power. The MPUC may either grant or deny the requested changes, in whole or in part, and may grant a lesser or greater increase than that requested for any class or classes of service.

For More Information

You may examine our current and proposed rate schedules and our request for new rates by visiting our Web site at www.mnpower.com. Or, you may contact the Minnesota Department of Commerce at 85 7th Place East, Suite 500, St. Paul, MN 55101, Phone: (651) 296-9314. Customers with hearing or speech disabilities may call through Minnesota Relay (800) 627-3529 or 711. Web: mn.gov/puc (search by docket number: select 16 in the year field, enter 664 in the number field, click on search, and the list of documents will appear on the next page).

Customers may submit comments with the Minnesota Public Utilities Commission:

Minnesota Public Utilities Commission

Online: Visit mn.gov/puc, select Speak Up!, find this docket (16-664), and add your comments to the discussion.

U.S. Mail: 121 7th Place East, Suite 350

St. Paul, MN 55101

Phone: 651-296-0406 or 1-800-657-3782

Customers with hearing or speech disabilities may call through Minnesota Relay 1-800-627-3529 or 711.

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Barnum, MN 55707

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Chickamaw Beach, MN 56474

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Cloquet City Administrator
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Kanabec County Commissioners
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Mora, MN 55051

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Lavell Township Clerk
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Bonnie Bieniek
Little Falls Township Clerk
20313 Highway 27
Little Falls, MN 56345

Peter Jager
Little Sauk Township Clerk
18557 County 11
Long Prairie, MN 56347

Julie Jacobson
Lone Pine Township Clerk
31469 E. Shore Drive
Pengilly, MN 55775

Walter Zastrow
Long Prairie Township Clerk
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MP's Service List to Counties and Municipalities

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Partridge Township Clerk
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Bruno, MN 55712

Lora Eames
Perch Lake Township Clerk
720 Salmi Road
Cloquet, MN 55720

Darlene Kroll
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Willow River, MN 55795

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Thomson Township Clerk
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Esko, MN 55733

Polly McDonald
Breitung Township Clerk
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Canosia Township Clerk
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Fayal Town Clerk
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Eveleth, MN 55791

Martin Fair
Industrial Township Clerk
7578 Albert Road
Saginaw, MN 55779

Ellen Hanson
Lakewood Township Clerk
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Duluth, MN 55803

Lois Lennartson
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Sturgeon Lake, MN 55783

CERTIFICATE OF SERVICE

I, Susan Romans, hereby certify that on the 2nd day of November, 2016, on behalf of Minnesota Power, I electronically filed a true and correct copy of Minnesota Power's Application for Authority to Increase Electric Service Rates in Minnesota (Docket No. E015/GR-16-664). A copy of the filing was provided via personal service to the Residential Utilities and Antitrust Division of the Office of the Attorney General and the Minnesota Department of Commerce, Division of Energy Resources. A summary of the filing was provided via electronic service or United States first class mail as designated on the attached service list.



Susan Romans

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