

**State of Minnesota
Before the Public Utilities Commission**

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Minnesota Power’s Revised Petition for a Competitive Rate for Energy-Intensive Trade-Exposed (EITE) Customers and an EITE Cost Recovery Rider Docket No. E-015/M-16-564

Comments of the Citizens Utility Board of Minnesota and Energy CENTS Coalition

The Citizens Utility Board of Minnesota (“CUB”) and Energy CENTS Coalition (“ECC” or “Energy CENTS”) appreciate the opportunity to comment jointly on Minnesota Power’s (“MP” or “the Company”) request to extend the term of its rate discount for energy-intensive, trade-exposed customers (“EITE rider”).

We understand Minnesota Power’s filing as follows. MP would continue the EITE rider until final rates from its current rate case (Docket No. E015/GR-19-442) are in place. If final rates are not in place by February 1, 2021, the date that the EITE rider expires, the EITE rider would be extended. If final rates are in place before February 1, 2021, the EITE rider would expire at that time. Additionally, MP does not intend to propose a further EITE rate after the expiration of the current rate. Rather, MP prefers to address class cost allocation and large power rates through the rate case.¹

CUB and Energy CENTS have argued, and we continue to believe, that it is preferable to address rates through a rate case proceeding.² This allows the Commission and parties to consider cost allocation in a comprehensive way and to properly consider customer impacts.

CUB’s and Energy CENTS’s primary concern related to the EITE rate continues to be its effect on other ratepayers, and on residential ratepayers in particular. To date, the cost of the EITE rate discount has been entirely offset by increased revenues from EITE customers and, therefore, has not required recovery through a rider to other customers. Minnesota Power has stated that it expects this situation to continue. In its most recent compliance filing in this docket, Minnesota Power wrote, “future comparisons in 2019 and 2020 of EITE customer revenues (excluding rider revenue) compared to the 2016 baseline, will likely show a large increase in EITE customer revenue, even without an EITE customer load increase. As a result, Minnesota Power does not expect to place a bill line for EITE cost recovery on customer bills during the four-year EITE term.”³ Because no EITE rider cost recovery is necessary, the main concerns that CUB and Energy CENTS have with this rate are mitigated.

¹ Podratz Direct, Docket No. E015/GR-19-442, at 103.

² Request of the Citizens Utility Board of Minnesota, Energy CENTS Coalition, and Minnesota Citizens Federation Northeast, Docket No: E-015/M-16-564, December 8, 2016.

³ Minnesota Power compliance filing, February 1, 2019, Docket No. E015/M-16-564 at 7.

CUB and Energy CENTS respectfully request that the Commission prohibit the company from recovering any EITE-related costs from non-EITE customers beyond February 1, 2021. With that consumer protection in place, we do not object to the extension of the EITE rate.

Thank you for your consideration.

Sincerely,

November 25, 2019

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