

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

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Chair  
Commissioner  
Commissioner  
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In the Matter of the Application for Approval  
of Minnesota Power's Arrowhead Regional  
Emission Abatement Proposal

ISSUE DATE: June 13, 2006

DOCKET NO. E-015/M-05-1678

ORDER APPROVING MINNESOTA  
POWER'S PROPOSAL SUBJECT TO  
CONDITIONS AND CLARIFICATIONS

**PROCEDURAL HISTORY**

On October 14, 2005, Minnesota Power (the Company) proposed to undertake projects to reduce the pollution emitted from some of its electric generators in the Arrowhead region of Minnesota. The Company calls this proposal the "Arrowhead Regional Emission Abatement Plan" or "AREA Plan."

On December 13, 2005, the Company proposed to finance the AREA Plan through a "rider" or increase in the amount the Company charges for electric energy, pursuant to Minnesota Statutes § 216B.1692.

On December 16, 2005, the Izaak Walton League of America (IWLA) filed comments.

On January 17, 2006, the Minnesota Pollution Control Agency (MPCA) filed an evaluation report including data regarding the Company's emissions reduction proposal.<sup>1</sup>

On February 21, 2006, IWLA, the Minnesota Department of Commerce (the Department) and a collection of firms with large energy demands (the Large Power Intervenors) filed comments.

On March 7, 2006, the Company filed reply comments and proposed tariff pages.

On March 24, 2006, the Department filed additional comments.

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<sup>1</sup> MPCA is required to evaluate a utility's emissions reduction project filing and provide the Commission with specific data. Minn. Stat. § 216B.1692, subd. 4.

On April 4, 2006, the Office of Administrative Hearings (OAH) convened a public hearing on this matter, and subsequently filed a summary of the testimony received.

On April 7, 2006, MPCA provided an oral presentation of its analysis of the Company's plan.

The Commission met on May 25, 2006, to consider this matter.

## **FINDINGS AND CONCLUSIONS**

### **I. THE EMISSIONS REDUCTION PROPOSAL**

The Company filed its AREA Plan under Minnesota Statutes § 216B.1692. That statute authorizes electric utilities to file proposals to reduce emissions from large generating plants too old to be subject to the emissions restrictions applicable to new plants under the federal Clean Air Act, 42 U.S.C. § 7401 *et seq.* The statute also authorizes the Commission to permit the utility to recover the cost of its proposal without the need to file a general rate case, via an "emissions reduction rate rider."

The Company proposed to carry out extensive and costly renovations in two areas of Minnesota. The Company proposes to install low NO<sub>x</sub> burners and overfire air systems to reduce the amount of nitrogen oxides (NO<sub>x</sub>) emitted from both generators at the Syl Laskin Energy Center (Laskin) located in Aurora, near Hoyt Lakes. And the Company proposes to use new technology from Mobotec, a Swedish firm, to reduce the amount of NO<sub>x</sub>, sulfur dioxide (SO<sub>2</sub>) and mercury emitted from the three generators of the Taconite Harbor Energy Center (Taconite Harbor) located in Schroeder. Because Taconite Harbor is fueled with sub-bituminous coal, and Mobotec has not used its mercury-reduction system with this type of coal, the Company and Mobotec propose to test this system at the Taconite Harbor Unit 2 generator before proceeding further.

The Company does not anticipate that the AREA Plan will change any plant's generating capacity.

Minnesota Power estimates that the AREA plan will eventually require an investment of \$53.9 million plus \$4.07 million annually for operation and maintenance. The amount of the Company's proposed cost-recovery rider would grow over time as the Company installed more plant and as the newly-installed plant triggered operating and maintenance expenses. For purposes of calculating the rider, however, the Company agrees to cap the amount of capital investment at \$53.9 million and the annual amount of operating and maintenance expense at \$4.07 million.

### **II. COMMENTS**

#### **A. The Minnesota Pollution Control Agency**

MPCA has a statutory duty to report on a party's emissions reduction proposal under § 216B.1692. MPCA notes that the Minnesota Legislature adopted this statute to address a loophole in the federal Clean Air Act. In adopting the landmark emissions-control law in 1970, Congress

exempted existing power plants on the theory that they would gradually be retired or refurbished to comply with the emissions limits. But retirements and refurbishments have proven more gradual than anticipated, and many aging plants have remained in operation without conforming to the emissions limits required of newer plants. By providing a means to finance emission-reduction technology, § 216B.1692 is designed to remove a utility's disincentive to voluntarily bring older generators into compliance with the Clean Air Act standards – or at least closer to compliance.

The MPCA concludes that the AREA Plan meets the requirements of § 216B.1692. The Plan would substantially reduce emissions at existing large generators to either levels lower than the Clean Air Act requires for new generators, or the most cost-effective level of control, or both. The MPCA further concludes that the Plan would not increase any generator's capacity, and that the Company did not promulgate the Plan to fulfill any other state or federal standards, or as a corrective measure in any state or federal enforcement action.

The MPCA concludes that the Company fairly estimated the Plan's costs. Moreover, the Company has limited the risk of underestimating the costs by agreeing, for purposes of calculating cost recovery, to assume that the Plan will not cost more than \$53.9 million plus \$4.07 million per year for operation and maintenance.

The MPCA notes the benefits of reducing emissions of NO<sub>x</sub>, SO<sub>2</sub> and mercury. Using the same analysis employed in a prior § 216B.1692 case, the MPCA concludes that the Plan's anticipated benefits equal, and likely exceed, the Plan's anticipated costs. The MPCA was able to reach this conclusion even though it could not quantify, and therefore gave no weight to, some of the benefits of reducing regional haze, acid rain, ground-level ozone, and the emissions of fine particulates and mercury.

The MPCA also evaluated the Company's three alternative proposals for reducing emissions at Laskin and the two alternative proposals for reducing emissions at Taconite Harbor, and concluded that the AREA Plan identifies the most cost-effective proposal considered.

Nevertheless, the MPCA expresses concern that the method by which the Company proposes to reduce SO<sub>2</sub> emissions is likely to increase its emissions of fine particles, called particulate matter (PM). Fine particulates strongly correlate with increased health problems, including early death from cardiopulmonary disease and lung cancer. The federal Environmental Protection Agency established an ambient standard for fine particles, PM<sub>(2.5)</sub>, and requires state regulatory agencies to issue air alerts when monitoring shows actual ambient values approach levels that are still below the federal ambient standard. Minnesota has experienced several air alerts for high levels of fine particles.

The MPCA notes that the Company must control its PM emissions to comply with its operating permits, and that a number of technologies exist for this purpose. MPCA proposes that the Company explain how it plans to deal with the additional PM emissions.

## **B. Izaak Walton League of America**

Similar to the MPCA, the IWLA concludes that the AREA Plan, if successful, represents a cost-effective means to reduce air pollutant emissions at the Laskin and Taconite Harbor facilities. However, the IWLA asks the Commission to direct the Company to modify the Plan to reflect the potential costs associated with additional PM control at Taconite Harbor.

Additionally, IWLA proposes that the Commission continuously monitor Taconite Harbor to determine if the AREA Plan's goals are being met. IWLA also recommends that the Company declare how it will respond if Mobotec fails to meet the anticipated emission reductions.

## **C. The Department**

The Department supports the AREA Plan and cost-recovery rider, but also recommends that the Commission direct the Company to take additional steps.

First, the Department recommends that the Company report on the test of Mobotec's mercury reduction system on Taconite Harbor Unit 2. If the new technology cannot demonstrate the desired level of mercury reductions, the Department recommends that the Company propose remedial measures to achieve the desired reductions and provide support for the proposal.

Second, the Department supports the MPCA's recommendation that the Company explain how it intends to control the PM emissions that will result from the Company's SO<sub>2</sub> reduction strategy.

Third, the Department recommends accepting the Company's proposal to calculate the cost-recovery rider on the assumption that the AREA Plan will cost no more than \$53.9 million plus \$4.07 million annually for operating and maintenance expenses. The Department supports providing a mechanism to adjust the rider to compensate ("true up") to the extent that past revenues recovered differed from past costs incurred, subject to the caps noted above. The Department recommends that the Company report the proposed and actual costs of this project annually.

Finally, the Department recommends that the Commission direct the Company to file proposed tariff pages for its cost recovery rider.

## **D. Large Power Intervenors**

While the Large Power Intervenors do not oppose the AREA Plan, they express concerns about the Plan's cost and cost recovery mechanism.

First, the Large Power Intervenors express concern that controlling additional PM will add to the cost of the project. They question whether these costs would be in addition to the costs already identified – and capped – in the AREA Plan.

Second, these Intervenors argue that the rider will cause them to pay a disproportionate share of

the cost of the AREA Plan. While large power customers collectively consume 65% of the Company's energy output, the Intervenors argue that only 55% of the Company's costs are attributable to serving large power customers, as reflected in the Company's current rate design. By allocating the AREA Plan costs on the basis of energy consumption, these Intervenors argue, the rider fails to allocate costs on the basis of cost of service. To ameliorate this effect, these Intervenors ask the Company to eliminate the cost-recovery rider in its next rate case and to recover any remaining costs through base rates.

If the Commission requires the Company to provide a mechanism to adjust the rider to match revenues with costs, the Large Power Intervenors suggest keeping the mechanism simple. They note that the Plan's installation phase should be completed by 2008. In the interest of administrative convenience, these Intervenors suggest that the Commission defer such adjustments until the installation phase is complete and the capital costs are fully known (or until the Company's next general rate case).

#### **E. Minnesota Power**

The Company agrees to many of the requests made by the other parties. The Company agrees to report on the outcome of the test of the Mobotec system in controlling mercury emissions generated from sub-bituminous coal. The Company identifies three technologies it would employ to control the increased particulate materials resulting from the AREA Plan. The Company agrees not to seek to recover the cost of controlling additional PM emissions through the rider to the extent that these costs, when combined with the rest of the AREA Plan costs, would exceed the Plan's cost caps. And the Company provided proposed tariff pages.

While acknowledging that Mobotec has not previously employed its emission-reduction technology to reduce mercury emissions derived from sub-bituminous coal, the Company defends its proposal to employ the Mobotec system. Because mercury control is an evolving field, the Company notes that most control technologies have had limited application to date. The Company explained that it selected Mobotec after a systematic analysis of conventional and emerging technologies, guided by advice from the MPCA, and that Mobotec's unified system for controlling NO<sub>x</sub>, SO<sub>2</sub> and mercury offers the most promise for the least cost.

If Mobotec's system fails to provide the promised mercury reductions, the Company states that Mobotec is obligated to compensate by increasing its usage of its MinPlus mercury reduction technology at no additional cost. The Company also identifies a number of other technologies for reducing mercury emissions that Mobotec has developed or licenced for use.

Finally, the Company agrees to permit adjustments to its rider to achieve a better match between the Plan's costs and revenues. But in the interest of administrative convenience, the Company favors the proposal of the Large Power Intervenors to defer such adjustments until the installation phase is complete, or until a general rate case, whichever occurs first.

### **III. COMMISSION ANALYSIS OF AREA PLAN AND RATE RIDER**

The procedural requirements and substantive standards applicable to the Company's proposed emissions reduction rider are set forth in Minnesota Statutes § 216B.1692.

The Commission finds that the AREA Plan as modified herein comports with the statutory purposes and requirements, is in the public interest, and as such will be approved subject to the conditions set forth below. In reaching that conclusion, the Commission analyzes the Plan as follows.

**A. Procedural Requirements**

**1. Proposal to Reduce Emissions**

A utility seeking to obtain the benefits of § 216B.1692 must, 60 days before proposing a financing mechanism, submit a proposal for projects to reduce emissions at its generating facilities. The proposal must include the priority ordering of the emissions reductions project, a schedule for implementation, analysis relied on to develop the priority ranking, the alternative emissions reduction projects considered, emissions reductions expected to be achieved and the relation to applicable standards for new facilities under the federal Clean Air Act, and the general rationale and conclusions in determining the priority ranking. Minn. Stat. § 216B.1692, subd. 2.

The Company filed its AREA Plan with the Commission on October 14, 2005. The Commission finds that the AREA Plan fulfills the statute's timing and content requirements for an emissions reduction proposal.

**2. Petition to Recover Project Costs**

Sixty days after submitting a qualifying proposal for reducing emissions, a utility may ask the Commission to approve a rider to recover the costs of a qualifying emissions reduction project outside of a general rate case. The utility is required to provide specific information in that filing: a description of the project, activities involved in the project, a schedule for implementation, any analysis provided to the MPCA, assessment of alternatives to the project, proposed cost recovery method, any proposed recovery above cost, and the projected emissions reductions from the project. Minn. Stat. §216B.1692, subd. 3.

The Company filed its petition for approval of rate rider to recover the costs of the AREA Plan on December 13, 2005. The Company has also provided additional information in the record, including its March 7, 2006 reply comments and draft tariff pages.

The Commission finds that the Company's petition fulfills the statute's content requirements for a rider to recover the cost of the AREA Plan.

### **3. MPCA Evaluation**

The MPCA must evaluate a utility's emissions reduction proposal and 1) verify that the proposal meets the statutory qualifications, 2) describe the project's anticipated environmental benefits, and 3) assess the project's appropriateness. Minn. Stat. § 216B.1692, subd. 4. The MPCA filed its report on January 17, 2006, and provided an oral presentation of its analysis on April 7, as noted above. The Commission finds that the MPCA has provided the analysis and assessment required under the statute.

### **4. Opportunity for Written and Oral Comment**

After receiving the MPCA's environmental assessment, the Commission must allow opportunity for written and oral comment on the proposed emissions reduction rider proposal. Minn. Stat. § 216B.1692, subd. 5(a).

Opportunities for oral and written comment on the AREA Plan were as follows:

- On January 19, 2006, the Commission gave notice of the AREA Plan and rider, and solicited comments.
- On April 4, 2006, the OAH convened a public hearing on this matter. The Commission had given notice of this meeting on March 10, and the Company had published notice of this hearing in at least nine periodicals from March 19-24.
- On April 7, 2006, the Commission convened a public meeting to hear the MPCA's oral presentation of its analysis of the Company's plan. The Commission had given notice of this meeting on March 10.
- On May 25, the Commission convened a meeting to decide this matter. The Commission had given notice of this meeting on March 12 and 17.

The Commission finds that it has met and exceeded the requirement to provide an opportunity for written and oral comment.

### **B. Substantive Requirements / Criteria for Approval**

A utility may not recover the cost of its emission reduction project through a § 216B.1692 rate rider unless the project meets the following qualifications:

- The project is installed on existing large electric generating power plants, as defined by statute, located in the state.
- The project does not increase the capacity of the existing electric generating plant by more than 10 percent or 100 megawatts (MW).
- The project causes an existing plant to –

- (1) comply with new source review standards under the federal Clean Air Act, or
  - (2) emit air contaminants at levels substantially lower than allowed for new facilities under the federal Clean Air Act, or
  - (3) reduce a unit's emissions from current levels to the lowest cost-effective level when the utility demonstrates that it would not be cost effective to reduce emission to the levels in (1) or (2) above due to the age or condition of the generating unit.
- The utility is not pursuing the project to fulfill an existing obligation arising from the federal Clean Air Act or other new state or federal air quality standards, or any state or federal enforcement action.

Minn. Stat. § 216B.1692, subd. 1 and 5(c). In addition, the Commission may not authorize a utility to use a § 216B.1692 rate rider to recover costs not directly allocable to reduction of emissions. Minn. Stat. § 216B.1692, subd. 5(d).

The MPCA's January 17, 2006 Report states that the AREA Plan projects fulfill the statutorily-prescribed conditions. The Commission finds that the AREA Plan qualifies as an eligible project under the statute and reasonable costs related to its investments therein – including costs related to mitigating additional PM emissions – are eligible for recovery through the proposed rider.

### **C. Weighing Environmental Benefits and Consumer Costs**

Ultimately the Commission must approve, modify, or reject the proposed emissions reduction project based on whether the project – including the proposed cost recovery and any proposed recovery above cost – appropriately achieves environmental benefits at a reasonable cost to consumers. Minn. Stat. § 216B.1692, subd. 5(a). This provision requires the Commission to determine appropriateness, weighing environmental benefits against consumer costs. Since the value of certain environmental benefits cannot be reduced to dollars and cents, this weighing requires a policy decision for the Commission – a judgment about whether, taking all factors into consideration, the Project's benefits exceed its costs.

#### **1. Costs of the AREA Plan**

Costs are more easily quantified than benefits. The Company estimates the cost of its emissions reduction activities at Laskin and Taconite Harbor at \$53.9 million plus \$4.07 million annually for operation and maintenance. The MPCA concludes that this estimate is not excessive. While the financial consequence to customers of the AREA Plan will vary over time, the Company estimates that the rider will increase the cost of electricity for an average household no more than \$0.95 per month.

For purposes of comparing near-term consequences with later consequences, the MPCA applies a “discount rate” to the calculation of both costs and benefits. The Department criticizes the

MPCA's choice of discount rate for placing undue emphasis on later consequences and exaggerating the program's costs. However, because MPCA ultimately concluded that the AREA Plan's benefits would likely exceed their costs, the effect of the Department's critique is to bolster its confidence in the MPCA's conclusion.

## 2. Benefits of the AREA Plan

Evaluating benefits proves to be more challenging. By statute, the MPCA is given the responsibility to provide the Commission with an evaluation of the proposed project, including a description of the proposal's anticipated environmental benefits. The Commission gives the MPCA's report a central position in the Commission's understanding of those benefits.

The MPCA anticipates that the AREA Plan would eliminate half of the SO<sub>2</sub> (3,552 tons), two-thirds of the NO<sub>x</sub> (3,745 tons) and 72% of the mercury (64.4 pounds) emitted from Laskin and Taconite Harbor each year.

According to the MPCA, SO<sub>2</sub>, NO<sub>x</sub> and mercury contribute to widespread health concerns. SO<sub>2</sub> promotes acid rain. Among other harms, acid rain plays a role in converting mercury emissions into a form that is absorbed by fish. Because mercury can harm the development of the nervous system, mercury in fish contaminates the food supply for humans and other animals.

Also, NO<sub>x</sub> and SO<sub>2</sub> form PM that, when inhaled, contribute to cardiopulmonary disease and lung cancer, among other health problems. The MPCA cites a study that estimates the health benefits when SO<sub>2</sub> and NO<sub>x</sub> emissions are reduced at Minnesota coal-fired power plants.<sup>2</sup>

The MPCA notes that there are benefits to the Plan that are not directly quantifiable, including reduced emissions of mercury and other bioaccumulative metals and reduced contributions to ground level ozone (smog), regional haze and acid deposition. The MPCA also concludes that reducing emissions from Laskin and Taconite Harbor would benefit the nearby Boundary Waters Canoe Area Wilderness and Voyageurs National Park ecosystems.

In addition to the purely environmental benefits of reducing SO<sub>2</sub>, NO<sub>x</sub> and mercury emissions, the Company may reap economic benefits as well. The Department observes that the Clean Air Act authorizes firms to emit a limited amount of SO<sub>2</sub>, but also authorizes firms to buy or sell these emission "allowances" to meet their needs. To the extent that the AREA Plan permits the Company to reduce its SO<sub>2</sub> emissions, it could potentially sell its allowances to others, or at least refrain from buying as many from others. Similar allowance systems are under development for both NO<sub>x</sub> and

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<sup>2</sup> Nelson, C.D., *The Public Health Impacts of Particulate Emissions from Coal-fired Power Plants in Minnesota*. Thesis. Master of Science. University of Minnesota. October 2000.

mercury as part of the federal Clean Air Interstate Rule<sup>3</sup> and the Clean Air Mercury Rule.<sup>4</sup> Any financial benefits arising from the Company's reduced need for emission allowances would be applied to offset the cost of the AREA Plan to customers. Minn. Stat. § 216B.1692, subd. 5(b)(1).<sup>5</sup>

In sum, the MPCA concludes that the benefits of the AREA Plan most likely exceed their costs, and that the plan is reasonable and appropriate. No party has contested this conclusion; to the contrary, the parties have recommended Commission approval. Based on that record and the terms and purposes of § 216B.1692, the Commission finds that the AREA Plan appropriately achieves environmental benefits without unreasonable consumer costs.

### **3. Preference for the AREA Plan Over Alternatives**

Finally, the MPCA concludes that the proposals incorporated into the AREA Plan are more cost-effective than any of the alternatives considered by the Company. No party disagreed with the MPCA's conclusion or argued in favor of any alternative proposals. On the basis of the record, the Commission finds that the AREA Plan is superior to any alternatives considered.

For the foregoing reasons, the Commission finds that the AREA Plan appropriately achieves environmental benefits at a reasonable cost to consumers.

## **IV. CONDITIONS**

While the Commission finds that the AREA Plan fulfills the statutory purposes and requirements, the Commission will modify the Plan with the following conditions to ensure that its implementation appropriately achieves environmental benefits at reasonable cost.

First, the Commission finds merit in the Department's and IWLA's recommendation for ongoing reporting regarding the efficacy of the Mobotec system for reducing mercury emissions from sub-bituminous coal. The Commission will direct the Company to report the outcome of its test of the mercury-reduction technology at Taconite Harbor Unit 2.

Second, the Commission finds merit in the Department's and IWLA's recommendation to monitor the Company's progress in implementing its AREA Plan. To this end, the Commission will direct the Company to provide status reports on the level of NO<sub>x</sub> reductions achieved at Laskin; the level

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<sup>3</sup> 40 C.F.R. Parts 51, 72, 73, 74, 77, 78 and 96.

<sup>4</sup> 40 C.F.R. Part 60.

<sup>5</sup> See *In the Matter of the Minnesota Power 2004 Integrated Resource Plan*, Docket No. E-015/RP-04-865, ORDER ACCEPTING RESOURCE PLAN, ACCEPTING SETTLEMENT AS AMENDED, SETTING REPORTING REQUIREMENTS, FINDING COMPLIANCE WITH § 216B.1691, VARYING FILING DEADLINE AND REQUIRING COOPERATION WITH STAKEHOLDERS (May 19, 2006).

of mercury, NO<sub>x</sub>, and SO<sub>2</sub> reductions achieved at Taconite Harbor; and any contingency plans undertaken related to Mobotec mercury reductions and PM mitigation at Taconite Harbor.

Third, the Commission finds merit in the Department's recommendation to accept the Company's offer to limit the amount of AREA Plan cost recovery as an incentive for prudent management. The Company will calculate its rider amounts based on the cost of AREA Plan plant installed and the cost of operating and maintaining that plant – including the cost of any additional PM mitigation. But for purposes of calculating the amount of the cost-recovery rider, the Commission will direct the Company to limit the cost of the AREA Plan to \$53.9 million plus \$4.07 million per year for operation and maintenance. Additionally, the Company shall inform the Commission if the actual cost of the Plan exceeds these caps to enable the Commission to review of the matter.

Fourth, the Commission finds merit in the Department's proposal to permit the rider to be adjusted to ensure that the revenues recovered match the costs incurred, at least within the spending caps noted above. However, given that the Company anticipates completing the Plan's capital projects by 2008, the Commission finds merit in the proposal of the Company and the Large Power Intervenors to defer rider adjustments until all the Plan's components are in service and the capital costs are known. Consequently the Commission will authorize the parties to pursue such rider adjustments at that time.

Finally, the Commission will decline to otherwise modify or establish conditions regarding the design of the rider. Whatever the merits of the Large Power Intervenors' objections to a rider that allocates the Plan's cost on the basis of energy, the statute specifically authorizes this rate design. Minn. Stat. § 216B.1692, subd. 5(b)(5). Whether the rider should be eliminated in the Company's next rate case is a matter that will be deferred to that case.

### **ORDER**

1. The Commission hereby approves the Company's AREA Plan and rate rider, subject to the following conditions and reporting requirements.
2. The Company shall report its test of the Mobotec system for mercury reduction at Taconite Harbor Unit 2.
3. The Company shall submit periodic updates throughout the AREA Plan implementation period regarding the following:
  - A. The NO<sub>x</sub> reductions achieved at Laskin.
  - B. The mercury, NO<sub>x</sub>, and SO<sub>2</sub> reductions achieved at Taconite Harbor.
  - C. Any contingency plans undertaken, if necessary, and associated costs related to Mobotec mercury reductions and particulate matter mitigation at Taconite Harbor.

4. If the revenues collected by the rider differ from the AREA Plan's costs, parties may propose compensating rider adjustments once all of the AREA Plan components are in service or in the Company's next general rate case, whichever is sooner. But in no event shall the Company calculate the amount it recovers through the rider on the basis of more than \$53.9 million for capital costs and \$4.07 million for annual operating and maintenance expenses. If the actual cost of the AREA Plan exceeds these caps, the Company shall report this fact to the Commission to enable a Commission review the matter.
5. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar  
Executive Secretary

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