

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 its 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, which contain confidential financial, personnel, contractual, energy procurement, and third-party proprietary 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 information contained in this schedule constitutes information Minnesota Power considers to be trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). 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 2, Direct Testimony and Supporting Schedules	
<p>Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ___ (Taran), Direct Schedules 2 through 5 – Moody’s Credit Report on ALLETE, Inc. (Apr. 30, 2020); Moody’s Credit Report on ALLETE, Inc. (Apr. 27, 2021); Moody’s Credit Report on ALLETE, Inc. (May 31, 2022); Moody’s Credit Report on ALLETE, Inc. (June 2, 2023)</p>	<p>Schedules 2 through 5 are propriety reports prepared by a third-party vendor and provided to the Company on the condition that these reports be protected as trade secret and not publicly released. These reports derive 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, the Company maintains these reports as trade secret pursuant to Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified these entire reports as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Subscription-based credit opinions prepared by a third party.</p> <p>Author: Moody’s Investors Service</p> <p>General Import: These documents represent credit rating information for ALLETE, Inc. and other financial information as generated by a third party, and which are received through a paid subscription. The data derives value from not being readily ascertainable by the public, and therefore is maintained as a trade secret.</p> <p>Dates Prepared: April 30, 2020; April 27, 2021; May 31, 2022; June 2, 2023.</p>

Item/Location	Justification
<p>Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ___ (Taran), Direct Schedules 7 through 10 – S&P’s Research Update on ALLETE, Inc. (Apr. 22, 2020); S&P’s Credit Report on ALLETE, Inc. (May 18, 2021); S&P’s Credit Report on ALLETE, Inc. (Feb. 10, 2023); S&P’s Credit Report on ALLETE, Inc. (June 14, 2023)</p>	<p>Schedules 7 through 10 are propriety reports prepared by a third-party vendor and provided to the Company on the condition that these reports be protected as trade secret and not publicly released. These reports derive 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, the Company maintains these reports as trade secret under Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified these entire reports as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Subscription-based credit ratings prepared by a third party.</p> <p>Author: S&P Global</p> <p>General Import: These documents represent credit rating information for ALLETE, Inc. and other financial information as generated by a third party, and which are received through a paid subscription. The data derives value from not being readily ascertainable by the public, and therefore is maintained as a trade secret.</p> <p>Date Prepared: April 22, 2020; May 18, 2021; February 10, 2023; June 14, 2023.</p>

Item/Location	Justification
<p>Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ___ (Cutshall), Direct Schedule 2 – EEI Pension and OPEB Survey 2022-2023</p>	<p>Schedule 2 is a propriety report prepared by a third-party vendor and provided to the Company on the condition that this report be protected as trade secret and not publicly released. This report 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, the Company maintains this report as trade secret under Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified this entire report as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Utility retirement plan data in the form of survey results gathered and prepared by a third party.</p> <p>Author: Edison Electric Institute (“EEI”)</p> <p>General Import: These documents represent the results of an EEI survey of member utilities’ retirement plan components and associated cost recovery. EEI makes this material available to members, including Minnesota Power, by request, but prepares this document independently, maintains this list as proprietary and confidential, and does not share it with the general public. The data derives value for EEI, participants in the survey, and EEI members from not being readily ascertainable by the public, and therefore is maintained as a trade secret.</p> <p>Date Prepared: 2022-2023</p>

Item/Location	Justification
<p>Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ___ (Cutshall), Direct Schedule 4 – EEI Pension and OPEB Survey Select Results 2022-2023</p>	<p>Schedule 4 is a propriety report prepared by a third-party vendor and provided to the Company on the condition that this report be protected as trade secret and not publicly released. This report 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, the Company maintains this report as trade secret under Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified this entire report as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Utility retirement plan data in the form of survey results gathered and prepared by a third party.</p> <p>Author: Edison Electric Institute (“EEI”)</p> <p>General Import: These documents represent the results of an EEI survey of member utilities’ retirement plan components and associated cost recovery. EEI makes this material available to members, including Minnesota Power, by request, but prepares this document independently, maintains this list as proprietary and confidential, and does not share it with the general public. The data derives value for EEI, participants in the survey, and EEI members from not being readily ascertainable by the public, and therefore is maintained as a trade secret.</p> <p>Date Prepared: 2022-2023</p>

Item/Location	Justification
Volume 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Frank L. Frederickson, Section V.C.2, customer load data.	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Frank L. Frederickson, Table 4, customer load data.	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Frank L. Frederickson, Table 5, customer load data.	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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
<p>Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ____ (Krollman), Schedule 2, Excerpt from the 2023 Willis Towers Watson Energy Services BenVal Study</p>	<p>Schedule 2 is a propriety report prepared by a third-party vendor and provided to the Company on the condition that this report be protected as trade secret and not publicly released. This report 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, the Company maintains this report as trade secret under Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified this entire report as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Third-party-prepared employer benefit value data</p> <p>Author: Willis Towers Watson</p> <p>General Import: The information provides comparative economic data, was purchased from third party Willis Towers Watson, 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.</p> <p>Date Prepared: 2023</p>

Item/Location	Justification
Volume 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Todd Z. Simmons, Table 5	The information in Table 5 includes sales data the Company considers to be trade secret information protected by the Minnesota Data Practices Act. This information has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons and is subject to efforts by the Company to protect the information from public disclosure or use. For this reason, the Company asks that the data be treated as non-public data pursuant to Minn. Stat. § 13.37, subd. 1(b).
Volume 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Julie I. Pierce, Table 2	The information contained in this table includes capacity price information the Company 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 2, Direct Testimony and Supporting Schedules, Direct Testimony and Schedules of Julie I. Pierce, Section V, capacity information	The information assigned a trade secret designation herein includes sales data the Company considers to be trade secret information protected by the Minnesota Data Practices Act. This information has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons and is subject to efforts by the Company to protect the information from public disclosure or use. For this reason, the Company asks that the data be treated as non-public data pursuant to Minn. Stat. § 13.37, subd. 1(b).

Item/Location	Justification
Volume 2, Direct Testimony and Supporting Schedules, MP Exhibit ____ (Turner), Schedule 2, Revenue Credits – 2024 Unadjusted Test Year	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 3, Required Filing Schedules	
Volume 3, Required Filing Schedules, Direct Schedule E-2, Rate Design, Sales, and Revenue – Monthly	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) 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 3, Required Filing Schedules, Schedule H – 5A, Ten Highest Paid Officers and Employees’ Compensation	Schedule H– 5A includes compensation information for the ten highest paid employees of the Company. Minn. Stat. § 216B.16, subd.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 constitutes trade secret, information as defined by Minn. Stat. § 13.37, subd. 1(b) because it 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 3, Required Filing Schedules, Direct Schedule I-1, Calculation of Conservation Cost Recovery Charge	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers	
Volume 4, Workpapers, ADJ-IS-22, CCRC Credit for Large Light & Power CIP Opt-Out Customers	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, ADJ-IS-24, NOx Allowances	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 4, Workpapers, ADJ-IS-29, LP Demand Response	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, ADJ-IS-29, Capacity Revenues and Expenses	<p>The information labeled as trade secret herein includes contractually-negotiated pricing information and is trade secret information as defined by Minn. Stat. § 13.37, subd. 1(b). This information has independent economic value from not being generally known to, and not being readily ascertainable by proper means by, other parties who could obtain economic value from its disclosure or use. The disclosure of this information could adversely impact contract negotiations, potentially increasing costs for these services for our customers. Thus, the Company maintains this information as trade secret.</p>

Item/Location	Justification
<p>Volume 4, Workpapers, COC-2, S&P Global State Adjustment Clauses Report (July 18, 2022), S&P Global RRA State Regulatory Evaluations – Energy (Aug. 2023).</p>	<p>The information in this section of Volume 4 is a propriety report prepared by a third-party vendor and provided to the Company on the condition that this report be protected as trade secret and not publicly released. This report 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, the Company maintains this report as trade secret pursuant to Minn. Stat. § 13.37, subd. 1(b). Because the Company has classified this entire report as trade secret information, the Company provides the following description of the excised material as required by Minn. Rule 7829.0500, subp. 3:</p> <p>Nature of the Material: Subscription-based market reports prepared by a third party.</p> <p>Author: S&P Global</p> <p>General Import: The information herein designated as trade secret is financial information purchased from a third party and has been designated as non-public in its entirety because it contains information the Company considers to be trade secret as defined by Minn. Stat. § 13.37, subd. 1(b). The information derives independent economic value from not being generally known to, or readily ascertainable by proper means by, others who could obtain economic advantage from its disclosure or use.</p> <p>Date Prepared: July 18, 2022, August 2023</p>

Item/Location	Justification
Volume 4, Workpapers, AF-4, 2024 Jurisdictional & Class Customer Allocation	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, AF-5, 2023 Jurisdictional & Class Customer Allocation	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, AF-6, 2022 Jurisdictional & Class Customer Allocation	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, IR-2, Sales Forecast, Revenue, and Rate Design Data	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) 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 4, Workpapers, OS-2, Lead Lag Study	The information designated as trade secret herein is contractually-negotiated pricing information and is trade secret information as defined by Minn. Stat. § 13.37, subd. 1(b). This information has independent economic value from not being generally known to, and not being readily ascertainable by proper means by, other parties who could obtain economic value from its disclosure or use. The disclosure of this information could adversely impact contract negotiations, potentially increasing costs for these services for our customers. Thus, the Company maintains this information as trade secret.
Volume 4, Workpapers, OS-3, Minnesota Power’s 2022 Annual Electric Utility Forecast Report	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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 4, Workpapers, OS-4, Minnesota Power's 2023 Annual Electric Utility Forecast Report	The information contained herein includes customer data and is designated as trade secret, as defined by Minn. Stat. § 13.37, subd. 1(b). Specific customer data (including the name, address, or related usage) consists 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.