

Minnesota Power's Comments on Environmental Disclosure

December 10, 2001

Place	Discussion
Pie Chart	Minnesota Power understands and agrees that a separate "Certain Purchases" slice of the pie would still remain (though perhaps under a new and improved label). Purchases would be handled such that if the generation source is known, the purchase would be incorporated into the existing fuel source category and the emission characteristics reported accordingly. If the purchase is from an unknown generation source, the fuel source as well as the associated emissions would be based on regional data. The total group of available resources to serve retail customers is the same group of resources included in the utility's retail fuel adjustment calculation.
Text on Statewide Coal-Fired Power Plants	Minnesota Power agrees that this text be removed from the brochure. The new emissions chart provides a better comparison by fuel source. In addition, a "bigger picture" view of state emissions, if necessary, is best provided by the MPCA on their website.
Emission Charts and Text	Minnesota Power agrees with the technical workgroup that language stating health impacts of various emissions would be misleading to customers. Health impacts are dependent on a variety of factors, including the emission concentration, the mix of pollutants present and the exposure level. It is not appropriate to imply health impacts when an emission does not exceed standards established to be protective of human health and welfare with a margin of safety.