



AN ALLETE COMPANY

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October 7, 2024

VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of Minnesota Power's 2023 Safety,
Reliability and Service Quality Standards Report
Docket No. E015/M-24-29
SUPPLEMENTAL FILING**

Dear Mr. Seuffert:

Minnesota Power (or the "Company") submits this Compliance Filing pursuant to Order Point 2 of the Minnesota Public Utilities Commission's ("Commission") December 5, 2023 Order in the Company's 2022 Safety, Reliability and Service Quality ("SRSQ") Standards Report Docket.¹ Order Point 2 set the Company's 2023 Minnesota service territory-wide Reliability Standard at the Institute of Electrical and Electronics Engineers ("IEEE") benchmarking second quartile for medium utilities and the Work Centers benchmark second quartile for small utilities - and requires Minnesota Power to file a supplement to its 2023 SRSQ Report with an explanation of any standards not met.

IEEE published the 2023 benchmarking second quartile for medium utilities results for Minnesota Powers service territory wide and second quartile for small utilities Work Centers in September 2024. The results for the System Average Interruption Duration Index ("SAIDI"), the System Average Interruption Frequency Index ("SAIFI"), and Customer Average Interruption Duration Index ("CAIDI") are as follows:

¹ Docket No. E015/M-23-75.

I AM
ZERO INJURY.

*Together we choose to work safely for our families, each other, and the public.
We commit to be injury-free through continuous learning and improvement.*

IEEE Benchmark Year 2024 – Results for 2023 Data

	4	SAIDI ALL	SAIDI IEEE	SAIDI WOF	SAIDI WOP	SAIFI ALL	SAIFI IEEE	SAIFI WOF	SAIFI WOP	CAIDI ALL	CAIDI IEEE	CAIDI WOF	CAIDI WOP
SMALL	MIN	112	81	50	40	1.18	1.01	0.61	0.51	85	71	82	78
	Q1	188	149	133	117	1.28	1.06	0.86	0.79	135	96	140	127
	MEDIAN	289	180	174	147	1.32	1.11	0.98	0.90	167	132	166	154
	Q3	395	208	198	159	1.79	1.50	1.09	0.94	206	166	179	174
	MAX	485	268	231	179	3.20	2.58	1.33	1.00	276	186	197	201
	40	SAIDI ALL	SAIDI IEEE	SAIDI WOF	SAIDI WOP	SAIFI ALL	SAIFI IEEE	SAIFI WOF	SAIFI WOP	CAIDI ALL	CAIDI IEEE	CAIDI WOF	CAIDI WOP
MEDIUM	MIN	37	24	24	24	0.06	0.06	0.06	0.06	73	71	73	72
	Q1	136	85	80	74	0.95	0.74	0.64	0.58	152	111	113	115
	MEDIAN	222	121	107	103	1.28	1.00	0.86	0.78	188	139	143	142
	Q3	486	186	175	153	1.56	1.27	1.19	1.05	300	155	160	164
	MAX	2822	363	319	303	3.54	2.58	1.90	1.84	1032	589	562	562

Overall & Work Center Reliability Results in Comparison to 2024 IEEE Benchmark Results

Year 2023	SAIDI	SAIFI	CAIDI
IEEE Benchmark Year 2024 (2023 Data) Medium Utilities - 2nd Quartile	121	1.00	139
Results- Overall MP	103.60	1.16	89.33
IEEE Benchmark Year 2024 (2023 Data) Small Utilities - 2nd Quartile	180	1.11	132
Results- Central	78.68	0.90	87.60
Results- Northern	149.07	1.07	139.21
Results- Western	124.40	1.68	73.83

*Red indicates goal not met

Based on the IEEE second quartile standards for medium utilities, Minnesota Power - Overall Results met these major event-excluded target goals for SAIDI by 17.4 minutes and CAIDI by 49.67 minutes but failed to meet its goals for SAIFI by 0.16.

Based on the IEEE second quartile standards for small utilities, Minnesota Power - Work Centers met most of these major event-excluded target goals for SAIDI, SAIFI and CAIDI but failed to meet its goals for SAIFI in the Western Work Center by 0.57 and CAIDI in the Northern Work Center by 7.21 minutes.

Overhead Equipment, wildlife and vegetation were the largest contributor to outage causes in 2023. Minnesota Power is in its fourth year of strategically undergrounding overhead lines and will continue to invest in this initiative throughout this decade. Along with undergrounding high-risk areas of feeders, grid modernization continues to be a focus during asset renewal on the Company's aging system. Automation equipment such as IntelliRupters, TripSavers, motor operated switches and reclosers are being installed on Minnesota Power's systems and increased investments are planned for future projects to improve automated outage restoration for customers which will lead to improved reliability and shorter outages. The Company's Asset Management Department continues to prioritize preventative maintenance activities on aging switches and reclosers as well

Mr. Seuffert
October 7, 2024
Page 3

as responding to employee identified maintenance items through the geospatial reporting tool.

Minnesota Power continually strives to meet customer needs while also maintaining the core tenets of a reliable, safe, and affordable grid. The Company appreciates the Commission's continued interest in this matter. Please contact me at (218) 355-3082 or cvatalaro@allete.com if you have any questions regarding this filing.

Yours truly,

Claire Vatalaro

Claire Vatalaro
Regulatory Compliance Specialist

CMRV:kb

STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 7th day of October 2024, she served Minnesota Power's Compliance Filing in **Docket No. E015/M-24-29** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served electronically.



Susan Romans