

August 6, 2024

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

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E015/M-24-29

Dear Mr. Seuffert:

On April 1, 2024, Minnesota Power (MP or the Company) filed its 2023 Annual Safety, Reliability, and Service Quality Standards (SRSQ) [Report](#) and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024.

The Department filed [Comments](#) on June 28, 2024 providing its analysis, and:

- Recommending the Commission accept the 2023 Safety Report and set the 2024 statewide reliability standards at the Institute of Electrical and Electronic Engineers (IEEE) benchmarking 2nd quartile for medium utilities and the work center reliability standards at the IEEE benchmarking 2nd quartile for small utilities.
- Withholding a recommendation on the 2023 Service Quality Report and requesting MP to provide additional information in reply comments.
- Making recommendations for MP to include additional data to include in future SRSQ Reports.
- Withholding a recommendation on the 2023 Reliability Report until after the Company's future Supplemental Filing on the IEEE 2023 benchmarking data that MP will file later in 2024.

The Company submitted [Reply Comments](#) on July 22, 2024 providing the additional information that the Department requested regarding 2023 service quality performance. The Company also acknowledged the Department's requests for additional information to be included in future filings and confirming that the Company will include the requested information.

Regarding 2023 performance, MP stated that the information used for the Estimated Time of Restoration (ETR), which had indicated worsening accuracy in 2023, was not always accurate. The Company will be putting a new Outage Management System (OMS) in service in late 2024 which is anticipated to provide more accurate information including ETR calculations.¹ The Department considers this explanation minimal and will continue to monitor the ETR accuracy in future filings but acknowledges that MP met the reporting requirement regarding ETR for 2023. The Department notes that it would anticipate a new OMS roll-out will also impact other reporting metrics and requests that MP include a discussion on this and comparison of data from its existing OMS system with new OMS data (as available) in the 2024 SRSQ Report.

¹ Company Reply Comments, page 1.

The Company reported uptime of 99.95% to 99.97% of the payment system and detailed payment errors in Attachment A to the Reply Comments. Based on the detail provided, most failed payments tracked through the payment application failed due to account-related information such as insufficient funds, closed accounts, expired cards, etc.² The Department acknowledges that MP provided the required information on payment system uptime and error detail.

The Company provided a table on the overall average time to reconnect using the remote-reconnect program compared to the standard reconnection process. The Company noted it will provide this information in future SRSQ Reports. The Department notes that based on the information provided in MP's table, remote reconnection from either a disconnect or request to reconnection are both significantly shorter times for remote compared to standard reconnections. The Department supports MP continuing to provide this table and will continue to review this information in future SRSQ Reports.

Based on the Company's Reply Comments and the Department's analysis outlined in the June 28, 2024 Comments, the Department recommends that the Commission:

- **Accept** Minnesota Power's 2023 Safety Report.
- **Accept** Minnesota Power's 2023 Service Quality Report.
- Set the 2024 statewide reliability standards at the IEEE benchmarking 2nd quartile for medium utilities and the work center reliability standards at the IEEE benchmarking 2nd quartile for small utilities.
- Request MP include a discussion on the impact of the new OMS on reporting metrics and comparison of data from its existing OMS system and new OMS data (as available) in its 2024 SRSQ Report.

The Department will provide a recommendation on the Company's 2023 Reliability Report after reviewing the Company's future Supplemental Filing on IEEE 2023 benchmarking data that MP will file later in 2024.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

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² Company Reply Comments, page 2 and Attachment A.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. E015/M-24-29

Dated this 6th day of **August 2024**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	Brodin	mbrodin@allete.com	Minnesota Power Company	30 West Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-29_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-29_Official
MP Regulatory	Compliance	MPRegulatoryCompliance@mnpower.com	Minnesota Power	30 W Superior St. Duluth, MN 55802	Electronic Service	No	OFF_SL_24-29_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-29_Official
Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-29_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-29_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-29_Official
Claire	Vatalaro	cvatalaro@allete.com	Allete	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_24-29_Official