

December 15, 2025

Sasha Bergman
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: Second Supplemental Comments of the Minnesota Department of Commerce
Docket No. E015/M-25-29

Dear Ms. Bergman:

Attached are the second supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

Minnesota Power's 2024 Annual Safety, Reliability, and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2025.

The Report was filed by Minnesota Power (MP or the Company) on April 1, 2025. The Company filed Reply Comments on July 25, 2025 and first Supplemental Comments on August 25, 2025. The Department filed its first Supplemental Comments on November 3, 2025. The Company filed its Compliance filing on November 21, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission):

- Accept Minnesota Power's 2024 SRSQ Report.
- Set the benchmarking for MP's 2025 performance to the five-year average of the IEEE second-quartile benchmark (based on 2020 – 2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data.

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

MK/ad

Acronyms and Abbreviations

CAIDI	Customer Average Interruption Duration Index; the average time to restore service once an outage occurs. ¹
Department	Department of Commerce, Division of Energy Resources
EI	Edison Electric Institute
EIA	U.S. Energy Information Administration
IEEE	Institute of Electric and Electronics Engineers
MP	Minnesota Power
OMS	Outage Management System
PUC	Public Utilities Commission
SAIDI	System Average Interruption Duration Index; measures the total duration of an interruption for the average customer during a given period. ²
SAIFI	System Average Interruption Frequency Index; the average number of times that a system customer experiences an outage during the year. ³
SRSQ	Safety, Reliability, and Service Quality

¹ *Reliability*. National Association of Regulatory Utility Commissioners, (last visited December 1, 2025). Available at: <https://www.naruc.org/serving-the-public-interest/about/reliability/>.

² *Ibid.*

³ *Ibid.*



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/M-25-29

I. INTRODUCTION

On April 1, 2025, Minnesota Power (MP or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E015/M-25-29 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826.

The Department filed its initial comments on July 11, 2025 which included preliminary recommendations and a request for MP to provide additional information in a supplemental filing. MP filed reply comments on July 25, 2025 and its first supplemental comments on August 25, 2025 addressing the additional reporting requested in the Department's initial comments. The Department filed its first supplemental comments on November 3, 2025.

MP filed its second supplemental comments, reporting 2024 IEEE benchmarking data on November 21, 2025.

II. PROCEDURAL BACKGROUND

April 1, 2025	MP filed its 2024 SRSQ Report.
April 30, 2025	The Commission issued a notice of comment period for the Report.
July 11, 2025	The Department filed its initial comments.
July 25, 2025	MP filed its reply comments.
August 25, 2025	MP filed its first supplemental comments.
November 3, 2025	The Department filed its first supplemental comments.
November 7, 2025	IEEE published its updated IEEE Benchmark Year 2025 Results for 2024 Data which included utility size based results.
November 21, 2025	MP filed its compliance filing reporting IEEE benchmarking data.

III. DEPARTMENT ANALYSIS

A. PREVIOUS DEPARTMENT RECOMMENDATIONS

In the Department's initial comments⁴ filed on July 11, 2025 and first supplemental comments⁵ filed on November 3, 2025, the Department provided its analysis and recommendations on the Safety and Service Quality Reports.⁶

The Department updated its recommendations in its first supplemental comments, and recommended that the Commission:

- Accept MP's annual safety report.
- Accept MP's annual service quality report.
- Require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.

The Department provided a preliminary analysis of the utility's annual reliability report and proposed benchmarking for 2025 performance in its initial comments. At the time of the supplemental filing, the IEEE 2024 performance year results based on utility size were not yet available, so the Department noted that it would provide a recommendation on the reliability report and proposed benchmarking after the Company's supplemental filing reporting 2024 IEEE performance year results was received.

The Department continues to support the recommendations from its first supplemental comments and provides an update based on the Company's compliance filing below.

B. ANNUAL RELIABILITY REPORT – BENCHMARKING DATA

Consistent with the Commission's January 13, 2025 order in Docket No. E015/M-24-29,⁷ MP provided the IEEE 2024 performance year results in its compliance filing.⁸ The Commission set MP's 2024 statewide reliability standards for its Minnesota service territory at the IEEE benchmarking second quartile for medium utilities and at the work center level at the IEEE benchmarking second quartile for small utilities.

⁴ Department Comments, July 11, 2025 (eDockets [20257-220862-01](#)) (hereinafter "Department Comments").

⁵ Department First Supplemental Comments, November 3, 2025 (eDockets [202511-224628-01](#)).

⁶ The Department's initial and first supplemental comments responded to: MP's Initial Report, April 1, 2025 (eDockets [20254-217120-01](#)); MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)); MP First Supplemental Comments, August 25, 2025 (eDockets [20258-222361-01](#)).

⁷ *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, PUC Order, January 13, 2025, Docket No. E015/M-24-29 (eDockets: [20251-213880-01](#)) at Order points 2 and 3.

⁸ MP Compliance Filing, November 21, 2025 (eDockets: [202511-225185-01](#)) (hereinafter "MP Compliance Filing").

B.1. Limitations of IEEE Data

The Department notes that IEEE initially published Benchmark Year 2025 Results for 2024 Data on an all-respondent basis on August 15, 2025. IEEE later published updated results for the 2024 performance year which included utility size based results on November 7, 2025.⁹ This tiered results publishing is consistent with how IEEE published results for the 2023 performance year, and to the best of the Department's knowledge is the result of the Department or Minnesota electric utilities reaching out to IEEE to request utility size based results be published the last two years.

The 2023 performance year utility size based results were published with a caveat that the small utility data was not statistically significant.¹⁰ As the Company noted, the small utility sample size was again very small (4 respondents) in the 2024 performance year.¹¹ The Department reviewed IEEE performance data from 2020 – 2025, and in four out of these five years, the small utility sample size was based on four respondents.¹²

The Department raised concerns about the statistical significance of the small utility size results in last year's docket in addition to IEEE's results not initially including utility size based results and requested the discussion on alternate approaches to reliability standard setting that was included in the report¹³ which the Department discussed in its initial comments¹⁴ and revisits in sections B.3. and B.4. below.

B.2. MP's 2024 Performance Against IEEE Goals

The Company's second supplemental filing provides the IEEE 2024 benchmarking data which is summarized with MP's reliability performance data in Table 1 below.

⁹ *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>.

¹⁰ *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department Supplemental Comments, October 14, 2024, Docket No. E015/M-24-29 (eDockets: [202410-210927-01](https://cmte.ieee.org/pes-drwg/benchmarking/)) at 2.

¹¹ MP Compliance Filing at 1.

¹² *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>. IEEE's 2021 performance year data reported five small utility size respondents.

¹³ Report at 48-53.

¹⁴ Department Comments, July 11, 2025, (eDockets: [20257-220862-01](https://cmte.ieee.org/pes-drwg/benchmarking/)) at Section D, pages 14 – 17 and 34.

Table 1: MP 2024 Reliability Performance vs. 2024 IEEE Benchmark¹⁵

Work Center	Metric ¹⁶	2024 IEEE Benchmark ¹⁷	2024 MP Performance	Met Benchmark?	MP 5-Year Avg Performance (2019-2023) ¹⁸	2024 Performance Variance from 5-Yr Avg
Central	SAIDI	112	68.46	Yes	93.48	(25.02)
	SAIFI	0.91	0.93	No	1.07	(0.14)
	CAIDI	113	73.92	Yes	87.97	(14.05)
Northern	SAIDI	112	179.99	No	156.59	23.40
	SAIFI	0.91	1.82	No	1.14	0.68
	CAIDI	113	99.03	Yes	137.46	(38.43)
Western	SAIDI	112	183.72	No	144.28	39.45
	SAIFI	0.91	1.71	No	1.54	0.18
	CAIDI	113	107.27	Yes	95.20	12.08
System	SAIDI	150	119.90	Yes	121.77	(1.87)
	SAIFI	1.15	1.30	No	1.24	0.06
	CAIDI	128	92.41	Yes	98.24	(5.86)

Source: Minnesota Department of Commerce

In 2024, MP met six out of twelve (50%) of the benchmarks which is a decline from last year when the Company met 75% of the benchmarks. The Company missed the 2024 SAIDI goal at the Northern and Western work centers. The Company also exceeded the SAIFI goal for its system and each work center in 2024. The Company has exceeded its SAIFI goal for its system and for the Western work center each of the last five years.

MP identified weather as the largest reliability factor contributing to outages in 2024. The Company’s review and analysis found overhead equipment failure, vegetation, and underground equipment failure to be the other key factors affecting reliability.¹⁹ The Company described a variety of ongoing investments to address reliability including strategic undergrounding of overhead lines, installation of

¹⁵ MP Compliance Filing at 2, table labeled Overall and Work Center Reliability Results Compared to 2025 IEEE Benchmark Results – 2024 data.

¹⁶ SAIDI = System Average Interruption Duration Index, SAIFI = System Average Interruption Frequency Index, CAIDI = Customer Average Interruption Duration Index.

¹⁷ The IEEE 2023 performance year results note that the small utility quartiles are too small to be statistically significant in the 2023 performance year. MP’s work center benchmarks are based on IEEE’s small utility data. See *In the Matter of MP’s 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Supplemental Comments, October 14, 2024, Docket No. E015/24-29 (eDockets: [202410-210927-01](#)) at Department Attachment 1, page 4 of 9.

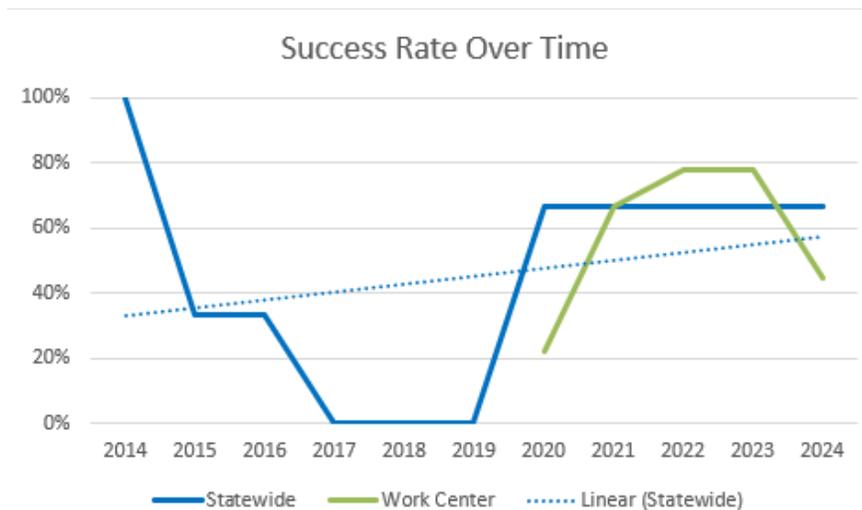
¹⁸ For the Western work center, 4-year averages (2020 – 2023) are shown. Data for 2019 was not found in historic petitions for this work center.

¹⁹ Report at pages 57 and 19 and MP Compliance Filing at page 2.

automation equipment, and future projects to improve outage restoration along with continued preventative maintenance.²⁰

Figure 1, below, shows the Company’s success rate at achieving its reliability benchmarking goals (based on IEEE data) from 2015 – 2024.

Figure 1: MP Goal Achieved % for 2014 - 2024²¹



As Figure 1 shows, the work center success rate has fluctuated while the Company’s statewide success rate has been stable over the last several years. The Department believes that reviewing MP’s performance against the Company’s five-year average (as shown in Table 1) is more indicative of performance over time than the goal achievement shown in Figure 1, especially for work centers, given the limited small-utility sample size reflected in IEEE results.

MP’s 2024 performance compared to the Company’s five-year averages was mixed. The Central work center performed better in 2024 than the average while seven out of nine of the remaining metrics were worse than the five-year averages (based on 2019 – 2023). CAIDI at the Northern work center and systemwide were better in 2024 than the five-year averages. These results coupled with the Company’s goal achievement indicate that the Company has yet to see improvements in reducing the average annual number of times an average member was without power (SAIFI).

²⁰ MP Compliance Filing at pages 2-3. See also the Department Comments, sections C.1. Reliability Performance and C.3. Action Plan to Improve Reliability for additional narrative on performance and Company efforts to improve reliability.

²¹ Only statewide benchmarks were set for MP from 2014 – 2019. Beginning in 2020, benchmarks were set at the statewide and work center levels, so the goal achieved calculation increased from being based on performance against goal for three metrics to twelve metrics in 2020.

B.3. Discussion of MP’s Proposed 2025 Benchmark: IEEE Five-Year Average with One-Year Lag

As discussed in MP’s Report and the Department’s initial comments, MP proposed using a five-year average of the IEEE benchmarks to set MP’s benchmarking.²² MP’s proposed reliability benchmarking would continue basing the statewide system benchmark on IEEE’s second-quartile results for medium-sized utilities and base work center benchmarks on the second-quartile benchmarks for small-sized utilities with a one-year lag of IEEE data compared to the MP performance year. This means that for the 2025 performance year, MP proposes to benchmark the company’s performance against IEEE Benchmark Year 2021-2025 results for 2020 – 2024 data.²³

The Department was initially supportive of MP’s proposed benchmarking approach;²⁴ however, while reviewing the most recent IEEE results the Department noticed that the small-sized utility data for the last five years was based on a very small number of respondents each year.²⁵ The Department is concerned about the outsize impact that a single utility’s results can have on the overall IEEE small-utility size data given the limited number of respondents.

Table 2 provides the five-year averages of IEEE results by respondent type, to correspond with the proposed benchmarking for the 2025 performance year.

Table 2: Five Year Averages of IEEE Data (2020 – 2024 Performance Years)²⁶

Metric	All IEEE Respondents	Medium-Sized Utilities	Small-Sized Utilities
SAIDI	129.60	135.60	174.60
SAIFI	1.06	1.06	1.26
CAIDI	125.40	130.00	115.60

Source: Minnesota Department of Commerce

Table 2 shows that the small-sized utility results vary the most significantly from the all respondent data which the Department suggests is a result of the large impact that each respondent has in the small sample size of small-utilities providing reliability data to IEEE.

²² Report at 48.

²³ Department Comments, July 11, 2025, (eDockets: [20257-220862-01](https://dockets.dhs.gov/20257-220862-01)) at Section D and Attachment 7, MP Response to Department IR No. 6.

²⁴ Id. at Section D. 4.

²⁵ According to IEEE’s results by year, the small-size utility results were based on five respondents in 2021 and four respondents for the other four years from 2020 to 2024. *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>. IEEE’s 2021 performance year data reported five small utility size respondents.

²⁶ Five-year averages calculated based on the 2020 to 2024 performance year IEEE results. *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>.

In response to the Department raising this concern, MP stated that it believes “using the five-year average [of the utility-size results] helps smooth year-to-year variations that might be amplified by the smaller sample size, providing a more stable and representative benchmark” and continues to recommend using the small-sized utility IEEE results for benchmarking workforce centers and medium-sized results for benchmarking the Company’s statewide results.²⁷

The Department still has concerns about the likelihood of IEEE publishing utility-sized performance results in the future and about the limited sample size for the small-utility results; however, the Department believes that the shift to using the five-year average helps mitigate some of these concerns by moderating the effect that an individual utility’s performance would have on the benchmark. Additionally, the proposed five-year average includes a one-year lag in performance years, which means that parties will know if utility-sized results are available when making benchmarking recommendations in future SRSQ dockets. As a result, the Department continues to support the Company’s proposal to benchmark the Company’s 2025 performance to the five-year average of IEEE second-quartile benchmarks (based on 2020 – 2024 performance year data), comparing MP’s statewide system against IEEE’s medium-sized utilities’ data and MP’s work centers against IEEE’s small-sized utilities’ data.

B.4. Department Recommendation

The Department recommends that the Commission accept MP’s Reliability Report as complete.

The Department recommends that the Commission benchmark MP’s 2025 performance to the five-year average of the IEEE second-quartile benchmarks (based on 2020 – 2024 performance year data), comparing MP’s statewide system against IEEE’s medium-sized utilities’ data and MP’s work centers against IEEE’s small-sized utilities’ data. For 2025, this would result in the system wide and work-center benchmarks outlined in Table 3 below.

Table 3: Recommended 2025 Benchmarks based on IEEE Five-Year Averages (2020 – 2024 Performance Years)²⁸

Metric	Statewide System Benchmark	Work Center Benchmark
SAIDI	135.60	174.60
SAIFI	1.06	1.26
CAIDI	130.00	115.60

Source: Minnesota Department of Commerce

²⁷ Department Attachment 1, MP Response to Department Information Request (IR) No. 14.

²⁸ Five-year averages calculated based on the 2020 to 2024 performance year IEEE results. *IEEE Distribution Reliability Working Group - Benchmarking*. IEEE (last visited November 13, 2025). Available at: <https://cmte.ieee.org/pes-drwg/benchmarking/>.

C. IMPACT OF MP ALLETE ACQUISITION DOCKET ON FUTURE SRSQ REPORTS

The December 10, 2025 Order in the MP ALLETE Acquisition docket includes language that will begin implementing underperformance penalties related to the Company's SRSQ filings with reporting starting one year after the close of the Acquisition and enforcement beginning two years after the close of the Acquisition.²⁹ The Acquisition closing is expected on December 15, 2025.³⁰

In the interest of memorializing SRSQ reporting requirements within the SRSQ docket, the Department includes an excerpt of the December 10, 2025 Order as an attachment to these comments.³¹

IV. DEPARTMENT RECOMMENDATIONS

From the Department's initial comments, the Department continues to recommend that the Commission:

- Accept MP's annual safety report.
- Accept MP's annual service quality report.
- Require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.

Based on analysis of the Report and subsequent filings, the Department provides additional recommendations below. The recommendations correspond to the subheadings of Section III above.

B. ANNUAL RELIABILITY REPORT – BENCHMARKING DATA

- B.4. Accept MP's annual service quality report.
- B.4. Benchmark MP's 2025 performance to the five-year average of the IEEE second-quartile benchmark (based on 2020 – 2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data.

²⁹ *In the Matter of Petition of MP for Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners*, Commission Order Approving Petition for Acquisition with Conditions and Establishing Other Requirements, December 10, 2025, Docket No. E015/PA-24-198 (eDockets: [202512-225721-01](https://investor.allete.com/node/23246/pdf)) at Order Point 2 (on page 31) and page 12 of the Settlement Stipulation (PDF page 52 of 95), items 1.64 a. and 1.64 b.

³⁰ *ALLETE Receives Written Order from MPUC Approving Acquisition by CPP Investments and Global Infrastructure Partners, Closing Expected Dec. 15*. ALLETE, Inc, (December 11, 2025). Available at: <https://investor.allete.com/node/23246/pdf>.

³¹ Department Attachment 2, excerpt from *In the Matter of Petition of MP for Acquisition of ALLETE by Canada Pension Plan Investment Board and Global Infrastructure Partners*, Commission Order Approving Petition for Acquisition with Conditions and Establishing Other Requirements, December 10, 2025, Docket No. E015/PA-24-198 (eDockets: [202512-225721-01](https://investor.allete.com/node/23246/pdf)) at pages 12-13 of the Settlement Stipulation (PDF pages 52-53 of 95), items 1.64 a. and 1.64 b. which was approved in Order Point 2 (on page 31).



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-25-29

Nonpublic Public

Requested From: Minnesota Power; Ana Vang, MP Regulatory Compliance Specialist

Date of Request: 12/4/2025

Type of Inquiry: General

Response Due: 12/15/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number: 14
Topic: 2025 Performance Benchmarking
Reference(s): Compliance filing, IEEE results

Request:

As MP noted in its compliance filing, the IEEE small utility size data again includes only four respondents for 2024 performance data. I reviewed IEEE's results site, and from 2020-2024 performance years, the small sized utilities had four respondents in four years and five in the other year.

- (1) Given the limited sample size of small sized utility results, does MP still believe it is reasonable to base the work center benchmarking goal on the recent five-year average of small size utilities as was proposed in the petition? Please provide a brief explanation.
- (2) Is the Company opposed to basing statewide and work center benchmarking on the IEEE all respondents' data instead of utility size data?

For reference, the recent IEEE data by respondent type is included below along with five-year averages.

	IEEE All Respondents			IEEE Medium Sized Utilities			IEEE Small Sized Utilities		
	SAIDI	SAIFI	CAIDI	SAIDI	SAIFI	CAIDI	SAIDI	SAIFI	CAIDI
2020	127.00	1.06	118.00	128.00	0.98	123.00	187.00	1.42	119.00
2021	136.00	1.10	121.00	136.00	1.08	126.00	201.00	1.46	89.00
2022	131.00	1.09	128.00	143.00	1.11	134.00	193.00	1.39	125.00
2023	119.00	0.98	136.00	121.00	1.00	139.00	180.00	1.11	132.00
2024	135.00	1.06	124.00	150.00	1.15	128.00	112.00	0.91	113.00
5-Yr Avg	129.60	1.06	125.40	135.60	1.06	130.00	174.60	1.26	115.60

To be completed by responder

Response Date: 12/12/25

Response by: Lee Gustafson

Email Address: lgustafson@mnpower.com

Phone Number: 218-355-2399



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-25-29

Nonpublic Public

Requested From: Minnesota Power; Ana Vang, MP Regulatory Compliance Specialist

Date of Request: 12/4/2025

Type of Inquiry: General

Response Due: 12/15/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Response:

Minnesota Power appreciates the Department of Commerce's thoughtful review of the Company's SRSQ filing and the ongoing collaborative efforts to ensure appropriate benchmarking standards for service quality reporting. The Company values the Department's engagement on these important matters and looks forward to continued collaboration. While there may be opportunities to explore more robust comparison methodologies in future proceedings, for the purposes of this year's benchmarking and without a more comprehensive process, Minnesota Power believes the current benchmarking approach should move to the five-year average as recommended in the SRSQ.

- (1) Given the limited sample size of small sized utility results, does MP still believe it is reasonable to base the work center benchmarking goal on the recent five-year average of small size utilities as was proposed in the petition? Please provide a brief explanation.
 - a. Minnesota Power continues to believe it is reasonable to base the work center benchmarking goal on the recent five-year average of small size utilities. As noted in the SRSQ filing, while the sample size of four to five respondents is limited, this represents the most appropriate peer group for meaningful comparison. The small utility category captures utilities with similar operational characteristics, service territory attributes, and customer density patterns that make performance comparisons more valid and actionable. Using a five-year average helps smooth year-to-year variations that might be amplified by the smaller sample size, providing a more stable and representative benchmark.
- (2) Is the Company opposed to basing statewide and work center benchmarking on the IEEE all respondents' data instead of utility size data?
 - a. Minnesota Power is opposed to basing statewide and work center benchmarking on the IEEE all respondents' data instead of utility size data. Comparing Minnesota Power's performance to all IEEE respondents would not provide an appropriate "apples to apples" comparison. For example, larger utilities (which make up nearly forty percent of all respondents) typically operate in

To be completed by responder

Response Date: 12/12/25

Response by: Lee Gustafson

Email Address: lgustafson@mnpower.com

Phone Number: 218-355-2399



Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-25-29

Nonpublic Public

Requested From: Minnesota Power; Ana Vang, MP Regulatory Compliance Specialist

Date of Request: 12/4/2025

Type of Inquiry: General

Response Due: 12/15/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).

Assigned Analyst(s): Mary Beth Kehrwald

Email Address(es): marybeth.kehrwald@state.mn.us

Phone Number(s): 651-539-1808

ADDITIONAL INSTRUCTIONS:

Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

significantly different environments, with more dense urban and suburban networks, substantially more customers per mile of distribution line, and different operational challenges than those faced by utilities like Minnesota Power. These fundamental differences in service territory characteristics, customer density, geography, and system configuration make direct comparisons to the broader IEEE dataset inappropriate and potentially misleading for benchmarking purposes.

To be completed by responder

Response Date: 12/12/25

Response by: Lee Gustafson

Email Address: lgustafson@mnpower.com

Phone Number: 218-355-2399

Excerpt from the December 10, 2025 Order in Docket No. E015/PA-24-198, PDF pages 52-53 which is from the Settlement Statement approved in Order Point 2. See section 1.64.

to the Fund totaling \$50 million no later than March 3, 2030.

- c. The Fund will only be used to finance Minnesota Power investments in clean firm technology approved by the Public Utilities Commission. “Clean firm technology” means “a carbon-free resource, as defined by Minn. Stat. § 216B.1691, subd. 1(b), that can be dispatched and provide energy continuously for a duration of 50 hours or more.” The Settling Parties recognize that new or additional technologies and options may emerge at any time. If Minnesota Power identifies an opportunity that may meet the intent of the Fund but does not fully satisfy the aforementioned definition, it may propose the opportunity to the Commission after conferring with the Department to confirm that the Department does not object in principle.
- d. Neither contributions to the Fund nor the portion of an investment or project financed with the Fund would be subject to cost recovery (e.g., no return on capital or depreciation).

1.64 The following metrics are tied to present requirements in Minnesota Power’s annual Safety, Reliability, and Service Quality (“SRSQ”) docket. Going forward, changes to Commission rules governing service quality or changes to the metrics in the SRSQ docket may also change these metrics, subject to the underperformance payments noted below. Each of the following are subject to reporting starting one year after the close of the Acquisition and enforcement beginning two years after the close of the Acquisition:

- a. If Minnesota Power’s statewide service reliability fails to meet or exceed the Institute of Electrical and Electronics Engineers (“IEEE”) second quartile benchmark for medium utilities, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- b. If one or more of Minnesota Power’s work centers’ reliability fails to meet or exceed the IEEE second quartile benchmark for small utilities, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- c. If the number of non-MN DIP service complaints by Minnesota Power customers forwarded to the utility from the Commission's Consumer Affairs Office exceeds fifty (50) in a given reporting year, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- d. If Minnesota Power fails to grant at least 99 percent of Cold Weather Rule protection requests which meet Minnesota statutory requirements, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- e. If Minnesota Power fails to restore at least 65 percent of involuntarily disconnected, as defined in the Minnesota Rule 7826.1500, residential customers to service within 24 hours, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- f. If Minnesota Power fails to answer at least 80 percent of customer calls received

during business hours within 20 seconds, Minnesota Power shall be required to make a \$250,000 underperformance payment.

- g. If Minnesota Power fails to ensure that at least 99.3 percent of customer invoices are accurate, Minnesota Power shall be required to make a \$250,000 underperformance payment.
- h. Fifty percent of any under-performance payments assessed will be applied to customer bills during the following July billing cycle of a given performance year on an equal rate per kWh for each customer; the remaining fifty percent will be reinvested into options to address the cause of the underperformance. Any bill credit amounts not remitted by the end of the July billing cycle shall accrue interest beginning after the September billing cycle of the applicable year at a rate equal to that applied to Minnesota Power's customer deposits.
- i. Underperformance payments shall not be recoverable from Minnesota Power ratepayers.

J. Other Commitments

1.65 ALLETE will continue to publish a Corporate Sustainability Report, which contains information related to environmental, social and governance issues, including the company's efforts to encourage diversity, equity and inclusion.

1.66 For as long as Minnesota Power is owned by the Partners, Minnesota Power will maintain historical levels of economic development in the State of Minnesota.

1.67 For as long as Minnesota Power is owned by the Partners, Minnesota Power will remain headquartered in Duluth, Minnesota

1.68 The Partners and Minnesota Power affirm that they are committed to the regulatory process in Minnesota and the jurisdiction of the Commission.

1.69 The Partners and Minnesota Power affirm that they are committed to Commission determinations regarding capital and O&M costs, utility rate recovery, cost allocations, utility capital.

1.70 The Partners and Minnesota Power affirm that they are committed to Commission determinations regarding resource planning, distribution planning and resource acquisition decisions.

1.71 The Partners and Minnesota Power commit to efforts to achieve Minnesota's Carbon Free Standard with least cost pathways to compliance ultimately determined by the Commission in IRP and related dockets.

1.72 The Partners defer to Minnesota Power to maintain culture, relationships, and overall approach to operations.

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
Supplemental Comments**

Docket No. E015/M-25-29

Dated this 15th day of **December 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-29
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-29
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-29
4	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-29
6	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
7	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-29
8	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 25-29
9	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
10	Sarah	Whiting	swhiting@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-29