



AN ALLETE COMPANY

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July 25, 2025

**VIA E-FILING**

Mike Bull  
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 2024 Annual Safety, Reliability, and Service  
Quality Report  
**Docket No. E015/M-25-29**  
**REPLY COMMENTS**

Dear Mr. Bull:

Minnesota Power respectfully submits these Reply Comments in response to the July 11, 2025 Comments of the Minnesota Department of Commerce ("Department") in the above referenced Docket.

Minnesota Power appreciates the Department's thorough review of the Company's 2024 SRSQ Report, and the opportunity to provide the additional information requested by the Department. Please contact me at (218) 591-4870 or [avang@mnpower.com](mailto:avang@mnpower.com) if you have any questions regarding this filing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Analeisha Vang'.

Analeisha Vang  
*Regulatory Compliance Specialist, Senior*

AMV:th  
Attach.

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.*

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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In the Matter of Minnesota Power’s 2024 Annual Safety,  
Reliability, and Service Quality Report

Docket No. E015/M-25-29  
**REPLY COMMENTS**

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**I. INTRODUCTION**

Minnesota Power (or the “Company”) submits these Reply Comments in response to Initial Comments filed by the Department of Commerce, Division of Energy Resources (“Department”) on July 11, 2025, in the above-referenced Docket. On April 1, 2025, Minnesota Power submitted its Annual Safety, Reliability, and Service Quality Metrics Report for 2024 (“2024 SRSQ Report”) to the Minnesota Public Utilities Commission (“Commission”). The Department recommended accepting the Safety portion of Minnesota Power’s 2024 SRSQ Report and will make final recommendations on the Company’s 2024 Service Quality Report after reviewing its Reply Comments. In the following section, the Company provides the requested information.

**II. RESPONSE TO DEPARTMENT COMMENTS**

**A. *Explain the difference between the Company’s forecast and actual 2024 remote-reconnect program costs.***

A combination of fewer remote-capable meters installed and higher avoided costs for remote reconnections due to a change in Labor-Vehicle cost assumptions are the explanation for the difference in forecasted assumptions for 2024 of \$185,000 and actual 2024 remote-reconnect program costs of \$67,000.

In the Department’s referenced forecasted figures for 2024, as provided in Information Request 8 under Docket No. E015/M-24-29, it was assumed that 2,072 remote-capable meters would be installed in 2024 and 1,665 remote reconnections would occur. This was based on a total target of 12,250 remote-capable meters through the pilot and assuming similar remote reconnections to 2023 (1,665 remote reconnections with approximately 84% reconnected during business hours and 16% reconnected after hours). In actuality

in 2024, 1,452 remote-capable meters were installed, bringing total remote-capable meter installations to 11,630, and there were 2,026 remote reconnections with approximately 83% reconnected during business hours and 17% reconnected after hours. Further, as discussed in the letter filed October 22, 2024 in the Reconnect Pilot Docket No. E015/M-19-766, the Labor/Vehicle cost assumption was updated, in consultation with Commission Staff, starting with calendar year 2024 analysis. The primary driver for the change in these costs was contract wage increases. These updated assumptions are as follows:

The updated 2024 Labor/Vehicle costs are:

- Regular Business Hours: \$60-\$90, inclusive of an estimated one hour of labor as well as vehicle costs (Average \$75)
- After Business Hours: \$140-\$210, inclusive of an estimated two hours of labor as well as vehicle costs (Average \$175)

Originally, the Labor/Vehicle costs were:

- Regular Business Hours: \$55-\$80, inclusive of an estimated one hour of labor as well as vehicle costs (Average \$67.50)
- After Business Hours: \$120-\$180, inclusive of an estimated two hours of labor as well as vehicle costs (Average \$150)

Notably, on September 26, 2023, the Company requested a two-year extension to its Reconnect Pilot Program. On January 9, 2024, this request was approved as part of the consent agenda of the Commission, extending the Pilot through July 2026. While the Company did not install the full 12,250 remote-capable meters by the end of 2024, as originally assumed, the Company is on track to install the total target of 12,250 remote-capable meters before the end of the extended pilot period. As discussed in the pilot extension request, Minnesota Power encountered supply chain and resource issues that delayed implementation. The remaining meter deployments continue to include timing with reconnections, along with the other deployment criteria described in the proposal

(i.e. geographic diversity, difficult access, hazardous location, and/or threats or unsafe conditions).

**B. *Provide the missing payment services error rate percentage.***

As this is not standard reporting the Company had established through its payment vendor, this information was requested and the Company is awaiting this information. Minnesota Power's payment vendor does not capture and store data on attempted and failed payments that occur during or due to payment system (Speedpay) outages; however, as reported in the SRSQ (Table 36, page 82), uptime across channels was 99.9% to 100% in 2024. In previous years, the "failed" payments that are tracked through the Company's payment vendor are actual attempts that make it to the application and then fail for some reason, typically bad card info, nonsufficient funds (NSF), expired card, invalid/closed account, etc. For Automated Clearing House (ACH) payments, payment returns primarily fall into three general categories – Unauthorized Returns, Administrative Returns, and NSF Returns. As such, the reported information shows total returns, as well as a breakdown of returns that fall into these three general categories. For credit cards, approval and decline rates are reported. Minnesota Power will file a supplemental filing with the available data when they receive it from the payment vendor.

**C. *Outage Management System ("OMS") Data***

The Department recommended that the Commission require Minnesota Power to include reliability performance data from both its old and new OMS, if available, in next year's report. Minnesota Power's new OMS system went live on December 3, 2024, and the Company's old system was decommissioned at that time. Only reliability data from the new OMS system will be available for 2025.

### **III. CONCLUSION**

Minnesota Power appreciates the opportunity to address the Department's requests in this matter, and remains committed to providing safe, reliable and affordable electric service to its unique customer base in northeastern and central Minnesota.

Dated: July 25, 2025

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Vang', with a long horizontal flourish extending to the right.

Analeisha Vang  
Regulatory Compliance Specialist, Senior  
Minnesota Power  
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Duluth, MN 55802  
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avang@mnpower.com

STATE OF MINNESOTA    )  
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COUNTY OF ST. LOUIS    )

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 25<sup>th</sup> day of July, 2025, I electronically filed a true and correct copy of Minnesota Power’s Reply Comments in **Docket No. E015/M-25-29** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket’s Official Service List for this Docket were served as requested.



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Tiana Heger