



July 31, 2025

VIA E-FILING

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

**Re: 2024 Conservation Improvement Program Consolidated Filing
Docket No. E015/M-25-48
Reply Comments**

Dear Mr. Bull:

Minnesota Power (the “Company”) respectfully submits to the Minnesota Public Utilities Commission (“Commission”) the following reply comments regarding Minnesota Power’s Energy Conservation and Optimization Program (“ECO”) Consolidated Filing (“Consolidated Filing”).

Reply Comments

On April 1, 2025, Minnesota Power filed its 2024 ECO Consolidated Filing. On July 22, 2025, the Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed comments recommending that the Commission approve the Company’s Consolidated Filing. Specifically, the Department recommended that in future filings, Minnesota Power:

1. Provide ECO trackers as Excel spreadsheets, with all formulae intact, covering all months from the prior year’s tracker and all months used to calculate the CPA.
2. May wish to provide redline and clean versions of its tariff pages that incorporate proposed CPA changes.

The Company is not opposed to these recommendations and will include them in future ECO Consolidated filings.

The Department recommended that the Commission:

1. Approve a performance incentive of \$2,600,685 for 2024 ECO activities;

2. Approve MP's 2024 ECO tracker account, resulting in a December 31, 2024 tracker balance of \$2,184,533;
3. Approve a 2025/2026 Conservation Program Adjustment of \$0.000817/kWh to be effective July 1, 2025, or the first month following the Commission's Order in this proceeding;
4. Approval to use a Carrying Charge rate of 0.6458% for the ECO Tracker; and
5. Require MP to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Minnesota Power thanks the Department for their analysis of the Consolidated Filing, and looks forward to working with them in future dockets, stakeholder groups, and other processes.

If you have any questions regarding this filing, please contact me at (218) 591-4870 or avang@mnpower.com.

Sincerely,



Analeisha Vang
Senior Public Policy Advisor

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STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Amy M. Honkala of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 31st day of July, 2025, I electronically filed a true and correct copy of Minnesota Power's **Reply Comments in Docket No. E015/M-25-48** 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.



Amy M. Honkala