

April 28, 2026

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

RE: Comments of the Minnesota Department of Commerce  
Docket No.E015/M-19-766

Dear Ms. Bergman,

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

*In the Matter of Minnesota Power's Reconnect Pilot Program.*

The Petition was filed by Minnesota Power (MP or the Company) on April 1, 2026.

**The Department recommends the Commission terminate Minnesota Power's Reconnect Pilot Program and transition it to standard operations** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

JK/KB/ad  
Attachment



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E015/M-19-766

#### I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its comments on Minnesota Power's petition filed in Docket No. E015/M-19-766.

On April 1, 2026, Minnesota Power (MP) submitted a petition to terminate the Reconnect Pilot Program and authorize remote reconnection as a standard operational practice for eligible residential customers.<sup>1</sup> The Reconnect Pilot Program allows residential customers with compatible meters to restore electric service remotely after they meet reconnection requirements. MP states that the program enables service to be restored within minutes and does not require a field visit.<sup>2</sup>

Based on the pilot's performance, MP reports that remote reconnection is supported by its Advanced Metering Infrastructure (AMI) deployment and is now an established operational capability for residential customers.<sup>3</sup>

In its petition, the Company also requests:

- MP be released from its pilot-specific reporting obligations in the annual Safety, Reliability, and Service Quality (SRQS) report beginning in 2026;
- permit the Company to continue its \$0 reconnection fee for remote reconnection for residential customers, while fees for in-person reconnections remain in place; and
- authorize MP to file necessary tariff updates reflecting the remote reconnection fee policy within 30 days of the Commission's Order.<sup>4</sup>

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<sup>1</sup> *In the Matter of Minnesota Power's Reconnect Pilot Program*, Minnesota Power, Petition, April 1, 2026, Docket No. E015/M-19-766, (eDockets) [20264-229911-01](#) (hereinafter "Petition").

<sup>2</sup> *Id.*, at 2.

<sup>3</sup> *Id.*, at 5.

<sup>4</sup> *Id.*, at 1.

## II. PROCEDURAL BACKGROUND

December 2, 2019	MP files its petition to waive the reconnection fee for customers through its proposed remote-reconnect pilot program. <sup>5</sup>
December 9, 2020	The Commission issues its Order approving MP's remote-reconnect pilot program. <sup>6</sup>
September 26, 2023	MP submits a request to extend its Reconnect Pilot Program by two years. <sup>7</sup>
April 1, 2026	MP files a petition to transition its Reconnect Pilot program to a standard operational practice. <sup>8</sup>
April 7, 2026	The Commission issues a Notice of Comment in the present docket. <sup>9</sup>

Topic(s) open for comment:

- Should the Commission terminate Minnesota Power's Reconnect Pilot Program and transition it to standard operations?
- Should the Commission end Minnesota Power's requirement to include Reconnect Pilot Program-specific reporting requirements in its annual Safety, Reliability, and Service Quality (SRSQ) reports?
- Should the Commission require Minnesota Power to continue its current \$0 reconnection fee for remote-capable residential customers?
- Are there other issues or concerns related to this matter?

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<sup>5</sup> *In the Matter of Minnesota Power's Reconnect Pilot Program*, Minnesota Power, Petition, December 2, 2019, Docket No. E015/M-19-766, (eDockets) [2019-12-157962-01](#) (hereinafter "Pilot Program Proposal").

<sup>6</sup> *Order Approving Pilot Program*, December 9, 2020, Docket No. E015/M-19-766, (eDockets) [202012-168890-01](#) (hereinafter "Pilot Program Order").

<sup>7</sup> Minnesota Power, Extension Variance Request, September 26, 2023, Docket No. E015/M-19-766, (eDockets) [20239-199159-01](#) (hereinafter "Pilot Program Extension").

<sup>8</sup> Petition.

<sup>9</sup> *Notice of Comment Period on Possible Conclusion of Reconnect Pilot Program*, April 7, 2026, Docket No. E015/M-19-766, (eDockets) [20264-230087-01](#) (hereinafter "Notice").

### III. DEPARTMENT ANALYSIS

The Reconnect Pilot program was initially proposed in Docket No. E015/GR-16-664, where the Commission declined to make a ruling on the proposal as stakeholder concerns remained unresolved.<sup>10</sup> MP later submitted the Reconnect Pilot program in Docket No. E015/M-18-250 as part of Minnesota Power's 2017 Safety, Reliability, and Service Quality Report.<sup>11</sup> Due to continued stakeholder concerns and requests for additional information, MP requested to withdraw its proposal.<sup>12</sup> On May 14, 2019 the Commission approved the Company's request to withdraw and ordered MP to refile its petition under certain conditions. As a part of the Order, MP was also required to work with stakeholders to further develop the program.<sup>13</sup>

In its Reconnect Pilot Program proposal in Docket No. E015/M-19-766, MP reported stakeholder engagement with the Consumers Affairs Office (CAO), Energy CENTS Coalition, and Citizens Utility Board (CUB). At that time, stakeholders expressed mixed views on remote technology, noted particular interest in an automatic reconnection option, and emphasized retention of consumer protections.<sup>14</sup> However, the Department found that MP did not fulfill Commission directive in its proposal and requested further information from the Company, including a complete cost-benefit analysis.<sup>15</sup> MP subsequently provided this information in reply comments.<sup>16</sup> On December 9, 2020, the Commission approved the remote-reconnect pilot program and authorized the Company "to waive the reconnection fees for customers who take service under the reconnect pilot program."<sup>17</sup> The program remains subject to a two-year extension that continues the pilot through July 2026.<sup>18</sup>

In its most recent petition, MP requests that the Commission "issue an order concluding the Company's Reconnect Pilot Program approved in this docket and authorizing remote reconnection as a standard operational practice for eligible residential customers."<sup>19</sup>

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<sup>10</sup> *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, Findings of Fact, Conclusions, and Order*, March 12, 2018, Docket No. E015/GR-16-664, (eDockets) [20183-140963-01](#), at 81.

<sup>11</sup> *In the Matter of Minnesota Power's 2017 Safety, Reliability and Service Quality Standard Report*, Minnesota Power, Report, April 2, 2018, Docket No. E015/M-18-250, (eDockets) [20184-141629-01](#), at 34.

<sup>12</sup> *In the Matter of Minnesota Power's 2017 Safety, Reliability and Service Quality Standard Report*, Minnesota Power, Petition, April 10, 2019, Docket No. E015/M-18-250, (eDockets) [20194-151868-01](#).

<sup>13</sup> *In the Matter of Minnesota Power's 2017 Safety, Reliability, and Service-Quality Standards Report, Order Accepting Reports, Setting Filing Requirements, and Granting Withdrawal of Reconnect Pilot Proposal*, May 14, 2019, Docket No. E015/M-18-250 (eDockets) [20195-152910-01](#).

<sup>14</sup> Pilot Program Proposal, at 11.

<sup>15</sup> Department, Comments, January 2, 2020, Docket No. E015/M-19-766, (eDockets) [20201-158748-01](#).

<sup>16</sup> Minnesota Power, Reply Comments, February 20, 2020, Docket No. E015/M-19-766, (eDockets) [20202-160284-01](#).

<sup>17</sup> See Order Point 1 and 3. Pilot Program Order.

<sup>18</sup> Pilot Program Extension.

<sup>19</sup> Petition, at 1.

A. PROGRAM TRANSITION

The Department responds to the following Notice topic:

*Should the Commission terminate Minnesota Power's Reconnect Pilot Program and transition it to standard operations?*

In Minnesota Power's pilot program proposal, the Company estimated that up to ten percent of its 122,550 residential customers would participate.<sup>20</sup> MP reports that the pilot achieved its goal in January 2025. MP states, "the Company reached the pilot target of 12,250 remote-capable residential meters at the end of January 2025, with 12,298 remote-capable meters installed with residential customers at that time."<sup>21</sup> If the Commission were to approve the termination of the pilot program, the Company "will continue to provide in-person reconnection when remote reconnection is unavailable or otherwise necessary, consistent with applicable rules and tariffs."<sup>22</sup> MP also indicates that it will continue to offer meter upgrades at no additional charge, contingent on meter stock availability, for residential customers that seek remote reconnection but lack a remote-capable meter.<sup>23</sup>

The Department finds that MP has gathered sufficient information regarding participation levels and operational implementation of remote reconnection capability. Customer enrollment aligns with MP's program expectations and reflects broader utility trends toward AMI deployment and expanded use of remote capability. Accordingly, the Department supports termination of the pilot and transition to standard operations.

**The Department recommends the Commission terminate Minnesota Power's Reconnect Pilot Program and transition it to standard operations.**

**The Department recommends the Commission authorize Minnesota Power to file necessary tariff updates reflecting the remote reconnection fee policy within 30 days of the Commission's Order.**

B. SRSQ REPORTING

The Department responds to the following Notice topic:

*Should the Commission end Minnesota Power's requirement to include Reconnect Pilot Program-specific reporting requirements in its annual Safety, Reliability, and Service Quality (SRSQ) reports?*

As a part of its petition, MP requests that the Company no longer be subject to pilot-specific reporting requirements in its annual SRSQ. In its SRSQ, MP reports that the Company provides the following data for the Reconnect Pilot Program:

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<sup>20</sup> Pilot Program Proposal, 8.

<sup>21</sup> Petition, at 3.

<sup>22</sup> *Id.*, at 4.

<sup>23</sup> *Ibid.*

participation counts; total LIHEAP customers; number of LIHEAP customers participating; number of opt-outs; estimated annual cost savings; average reconnection time comparison; and the number of reconnections within 24 hours, distinguishing between standard and remote reconnections.<sup>24</sup>

Upon review, the Department supports elimination of Reconnect Pilot Program-specific reporting requirements, as those metrics are no longer necessary to support evaluation of the pilot if it is terminated. Moreover, in its annual SRSQ, MP is already required to report on involuntary disconnections<sup>25</sup> as well as metering reading performance, which includes AMI data.<sup>26</sup> However, outside of the Reconnect Pilot Program reporting requirements, the SRSQ does not require MP to report data related to Low Income Home Energy Assistance Program (LIHEAP) customers. The Department believes that LIHEAP-related data remains important to assess outcomes for low-income customers within the SRSQ. The Department also recognizes that other parties address LIHEAP and ancillary issues extensively in the context of economic regulation. Accordingly, the Department will review those parties' comments in this docket to determine the scope of any recommendation regarding this issue.

**The Department withholds its final recommendation on the requirement to include Reconnect Pilot Program-specific reporting requirements in its annual Safety, Reliability, and Service Quality (SRSQ) reports. The Department will submit a formal recommendation on this topic in reply comments.**

C. RECONNECTION FEE

The Department responds to the following Notice topic:

*Should the Commission require Minnesota Power to continue its current \$0 reconnection fee for remote-capable residential customers?*

The Department has consistently supported the Company's request to waive its reconnection fee for remote-capable residential customers with the condition that, "should the pilot become permanent in the future, the Department would expect Minnesota Power to furnish the specific net program costs and cost savings within a future rate case."<sup>27</sup>

The Commission appears to have agreed with the Department in its Pilot Program Order at Order Point 4:

Minnesota Power must provide testimony accounting for net cost changes due to remote reconnections in a future rate case to ensure that parties

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<sup>24</sup> Petition, at 2.

<sup>25</sup> [Minn. Rule 7826.1500](#)

<sup>26</sup> [Minn. Rule 7826.1400](#)

<sup>27</sup> *In the Matter of Minnesota Power's Reconnect Pilot Program*, Department, Response to Reply Comments, June 17, 2020, Docket No. E015/M-19-766, at 2, (eDockets) [20206-164054-01](#).

and the Commission are aware of the impacts on the representative test-year costs.<sup>28</sup>

The Department reviewed the Company's most recent general rate case, Docket No. E015/GR-23-155, focused on this topic and did not identify any testimony that addressed this issue. The Department requests that the Company provide an update as to the status of its compliance with this reporting requirement in its reply comments.

**The Department requests that Minnesota Power include, in reply comments, an update on its compliance with Order Point 4 of the Reconnect Pilot Program Order.<sup>29</sup>**

Additionally, the Department remains concerned about the Company's waiver of the reconnection fee for remote capable reconnection customers that have been disconnected due to non-payment. MP incurs some cost to reconnect those individuals, and under the standard regulatory policy of cost causers bearing the costs they impose on the system, those customers should be expected to pay the costs associated with their reconnection. The Department reasoned that, if waiving the reconnection fee were limited to a pilot program, then the extent of the costs imposed on other ratepayers was minimal and potentially temporary. Hence, the Department was willing to support waiving the reconnection fee in that instance.

The Order approving the pilot requires the Company to, at a minimum, provide an estimate of the costs associated with the program. As to whether Minnesota Power elects to recover some of the costs associated with remote reconnections of customers disconnected for non-payment or not, the Company's next general rate case can address the issue in the revenue apportionment process.

**The Department recommends that the Commission approve Minnesota Power's request to continue its current policy of waiving the reconnection fee for remote-capable residential customers.**

**The Department recommends that the Commission require Minnesota Power to provide, in its next general rate case, testimony that delineates the cost of remote reconnections and the cost of on-site reconnections.**

*D. OTHER ISSUES*

The Department responds to the following Notice topic:

*Are there other issues or concerns related to this matter?*

The Department has no other issues or concerns related to this matter at this time.

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<sup>28</sup> Pilot Program Order, at 5.

<sup>29</sup> *Ibid.*

#### IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of Minnesota Power's Reconnect Pilot Program and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

##### A. PROGRAM TRANSITION

- A.1. The Department recommends the Commission terminate Minnesota Power's Reconnect Pilot Program and transition it to standard operations.
- A.2. The Department recommends the Commission authorize Minnesota Power to file necessary tariff updates reflecting the remote reconnection fee policy within 30 days of the Commission's Order.

##### B. SRQS REPORTING

- B.1. The Department withholds its final recommendation on the requirement to include Reconnect Pilot Program-specific reporting requirements in its annual Safety, Reliability, and Service Quality (SRSQ) reports. The Department will submit a formal recommendation on this topic in reply comments.

##### C. RECONNECTION FEE

- C.1. The Department requests that Minnesota Power include, in reply comments, an update on its compliance with Order Point 4 of the Reconnect Pilot Program Order.<sup>30</sup>
- C.2. The Department recommends that the Commission approve Minnesota Power's request to continue its current policy of waiving the reconnection fee for remote-capable residential customers.
- C.3. The Department recommends that the Commission require Minnesota Power to provide, in its next general rate case, testimony that delineates the cost of remote reconnections and the cost of on-site reconnections.

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<sup>30</sup> See Order Point 4. Pilot Program Proposal.

## Attachments

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of people 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**  
**Comments**

**Docket No. E015/M-19-766**

Dated this **28<sup>th</sup>** day of **April 2026**

**/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	M-19-766
2	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-19-766
3	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	M-19-766
4	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	M-19-766
5	Hillary	Creurer	hcreurer@allete.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-19-766
6	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	M-19-766
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-19-766
8	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-19-766
9	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	M-19-766
10	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-19-766
11	Susan	Ludwig	sludwig@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-19-766
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-19-766
13	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-19-766

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	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	M-19-766
15	Susan	Romans	sromans@allete.com	Minnesota Power		30 West Superior Street Legal Dept Duulth MN, 55802 United States	Electronic Service		No	M-19-766