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May 14, 2025

VIA ELECTRONIC FILING

Will Seuffert Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101

Re: In the Matter of Recent Utility Cold Weather Rule Reports

Docket No. E,G-999/PR-25-02

Reply Comments of Minnesota Energy Resources Corporation

Dear Mr. Seuffert:

On February 28, 2025, the Minnesota Public Utilities Commission ("Commission") issued a Notice of Comment Period on Cold Weather Rule Reports for Regulated Gas and Electric Companies (the "Notice") in the above-referenced docket. Citizens Utility Board of Minnesota ("CUB") and the Legal Services Advocacy Project ("LSAP") filed joint comments on January 31, 2025 in Docket No. E,G-999/PR-24-2. Commission Staff reproduced CUB/LSAP's recommendations from those January 31, 2025 comments as Appendix A in the Notice. On March 31, 2025, Minnesota Energy Resources Corporation ("MERC" or "Company") filed Comments in response to the issues and topics in the Commission's February 28, 2025 Notice. On April 18, 2025, CUB/LSAP filed Reply Comments in the above-referenced docket.

MERC submits these Reply Comments in response to CUB/LSAP's April 18, 2025 Reply Comments.

While MERC's intention with the filing of its March 31, 2025 Comments were to be responsive to CUB/LSAP's initial concerns regarding information on the Company's current policies and practices on disconnections, service deposits and payment agreements, the Company supports CUB/LSAP's continued recommendations at Appendix #1 and #2 of the Notice.¹

¹ Appendix A, Request #1 of the February 28, 2025 Notice reads as follows: Require regulated utilities to submit a compliance filing in the instant docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. Require regulated utilities to submit additional filings in Docket No. E,G-

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Respectfully submitted,

Joylyn Hoffman Malueg Senior Project Specialist

Joseph C. Hogma Malueg

Minnesota Energy Resources Corporation

cc: Service List

^{999/}PR-YR-02 whenever there are changes to their disconnection, service deposit, and payment agreement policies and practices. For those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined.

Appendix A, Request #2 of the February 28, 2025 Notice reads as follows: Require regulated utilities to display their disconnection, service deposit, and payment agreement policies and practices on their respective websites, and explain those procedures in clear, easy-to-understand language.

CUB and LSAP continues to make these recommendations in their April 18, 2025 Comments filed in the above referenced docket.

CERTIFICATE OF SERVICE

I, Colleen T. Sipiorski, hereby certify that on the 14th day of May, 2025, on behalf of Minnesota Energy Resources Corporation (MERC), I electronically filed a true and correct copy of MERC Reply Comments on www.edockets.state.mn.us. Said documents were also served via U.S. mail and electronic service as designated on the attached service list.

Dated this 14th day of May, 2025.

/s/ Colleen T. Sipiorski
Colleen T. Sipiorski

Last Name	First Name	Email	Organization	Agency	Delivery Method	Alternate □ View Trade Service List	
Anderson	Kristine	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		Electronic Service	No	PR-25-2
Baumtrog	Ryan	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	Electronic Service	No	PR-25-2
Brodin	Matthew	mbrodin@allete.com	Minnesota Power		Electronic Service	No	PR-25-2
Commerce Attorneys	Generic	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Electronic Service	Yes	PR-25-2
Crawford	Brandon	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No	PR-25-2
Dahlberg	Beverly	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		Electronic Service	No	PR-25-2
Dockter	Bridget	bridget.dockter@xcelenergy.com			Electronic Service	No	PR-25-2
Edstrom	Brian	briane@cubminnesota.org	Citizens Utility Board of Minnesota		Electronic Service	No	PR-25-2
Elwood	Ron	relwood@mnlsap.org	Legal Services Advocacy Project		Electronic Service	No	PR-25-2
Ferguson	Sharon	sharon.ferguson@state.mn.us		Department of Commerce	Electronic Service	No	PR-25-2
Glumack	Jenny	jenny@mrea.org	Minnesota Rural Electric Association		Electronic Service	No	PR-25-2
Heinen	Adam	aheinen@dakotaelectric.com	Dakota Electric Association		Electronic Service	No	PR-25-2
Jacobson	Travis	travis.jacobson@mdu.com	Great Plains Natural Gas Company		Electronic Service	No	PR-25-2
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Kremeier	Collin	ckremeier@otpco.com	Otter Tail Power Company		Electronic Service	No	PR-25-2
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Loos	Jason	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		Electronic Service	No	PR-25-2
Moe	Darrick	darrick@mrea.org	Minnesota Rural Electric Association		Electronic Service	No	PR-25-2
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Peterson	Jennifer	jjpeterson@mnpower.com	Minnesota Power		Electronic Service	No	PR-25-2
Residential Utilities Division	Generic Notice	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Electronic Service	Yes	PR-25-2
Schinzing	Jodi	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		Electronic Service	No	PR-25-2
Schultz	Lori	lorischultz@minncap.org	Minnesota Community Action Partnership		Electronic Service	No	PR-25-2
Seuffert	Will	will.seuffert@state.mn.us		Public Utilities Commission	Electronic Service	Yes	PR-25-2
Stasik	Richard	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		Electronic Service	No	PR-25-2
Teiken	Katherine	katherine.teiken@state.mn.us			Electronic Service	No	PR-25-2