



August 29, 2022

**VIA E-FILING**

Will Seuffert  
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 2021 Safety,  
Reliability and Service Quality Standards Report  
Docket No. E015/M-22-163  
COMPLIANCE FILING**

Dear Mr. Seuffert:

Minnesota Power (or the "Company") submits its Compliance Filing pursuant to Order Point 3 of the Minnesota Public Utilities Commission's ("Commission") March 2, 2022 Order in the Company's 2020 Safety, Reliability and Service Quality Standards Report Docket.<sup>1</sup> Order Point 2 set the Company's 2021 Minnesota service territory-wide Reliability Standard at the Institute of Electrical and Electronics Engineers ("IEEE") benchmarking second quartile for medium utilities. Additionally, it stipulates that Minnesota Power must submit a supplemental filing to its 2021 service quality report 30 days after IEEE publishes the 2021 benchmarking results, with an explanation for any standards the utilities did not meet.

IEEE published the 2021 benchmarking second quartile for medium utilities results in July 2022. The results for the System Average Interruption Duration Index ("SAIDI"), the System Average Interruption Frequency Index ("SAIFI"), and Customer Average Interruption Duration Index ("CAIDI") are as follows:

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<sup>1</sup> Docket No. E015/M-21-230.

## SAIDI

Medium	45	SAIDI ALL	SAIDI IEEE	SAIDI WOF	SAIDI WOP
0	MN	39	28	28	27
1	Q1	154	97	94	86
2	MEDIAN	219	136	120	115
3	Q3	448	184	165	152
4	MAX	7454	405	391	347

## SAIFI & CAIDI

Medium	45	SAIFI ALL	SAIFI IEEE	SAIFI WOF	SAIFI WOP	CAIDI ALL	CAIDI IEEE
0	MN	0.28	0.25	0.24	0.24	77	62
1	Q1	1.11	0.83	0.74	0.68	133	108
2	MEDIAN	1.35	1.08	0.95	0.88	182	126
3	Q3	1.76	1.48	1.24	1.14	254	142
4	MAX	3.31	2.16	1.97	1.66	2414	218

Based on the IEEE second quartile standards for medium utilities, Minnesota Power met these major event-excluded target goals for SAIDI by 10 minutes and CAIDI by 32.2 minutes but failed to meet its goals for SAIFI by 0.26.

	SAIDI	SAIFI	CAIDI
<b>2021 IEEE Benchmark (2020 data)</b>	128.00	0.98	123.00
<b>2022 IEEE Benchmark (2021 data)</b>	136.00	1.08	126
<b>2021 Results</b>	126.00	1.34	93.80

Weather and overhead equipment failures continued to be the largest contributor to outage causes in 2021. Minnesota Power is in its second year of strategically undergrounding overhead lines and is continuing to increase the budget for this project over the next 5 years. Along with undergrounding high risk areas of feeders, grid modernization continues to be a focus during asset renewal on the Company's aging system. Automation equipment such as IntelliRupters, Tripsavers, motor operated switches and re-closers are being installed on Minnesota Power's systems and increased investments are planned for future projects to improve automated outage restoration for customers which will lead to improved reliability and shorter outages. The Company's Asset Management Department continues to prioritize preventative maintenance activities on aging switches and re-closers as well as responding to employee identified maintenance items through the geospatial reporting tool.

In 2021, Minnesota Power hired a Distribution Grid Modernization engineer to drive the grid modernization programs going forward. Minnesota Power will act on these identified areas of improvement to limit outage extents and durations. All of these actions should not only improve the Company's SAIFI numbers moving forward, but overall reliability metrics should be improved.

Minnesota Power continually strives to meet customer needs while also maintaining the core tenets of a reliable, safe and affordable grid. The Company appreciates the Commission's continued interest in this matter. Please contact me at (218) 355-3082 or [cvatalaro@mnpower.com](mailto:cvatalaro@mnpower.com) if you have any questions regarding this filing.

Yours truly,

A handwritten signature in cursive script that reads "Claire Vatalaro".

Claire Vatalaro  
*Regulatory Compliance Specialist*

CMRV:th

STATE OF MINNESOTA     )  
                                      ) ss  
COUNTY OF ST. LOUIS    )

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AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 29<sup>th</sup> day of August, 2022, she served Minnesota Power's Compliance Filing in **Docket No. E015/M-22-163** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



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Tiana Heger