

September 10, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-18-250

Dear Mr. Wolf:

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report.

The 2017 report was filed on April 2, 2018 by:

Jenna Warmuth
Senior Public Policy Advisor
Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802-2093

The Department recommends that the Minnesota Public Utilities Commission (Commission) **accept Minnesota Power's Safety, Reliability and Service Quality Standards Report and set reliability goals for 2018 at 2017 levels. The Department further recommends approval of Minnesota Power's proposed Reconnect Pilot Program, pending more information from the Company.** The Department is available to answer any questions that the Commission may have on this matter.

Sincerely,

/s/ Danielle D. Winner
Rates Analyst

DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E015/M-18-250

I. BACKGROUND

On April 2, 2018, Minnesota Power (MP or the Company) submitted its annual Safety, Reliability, and Service Quality Standards Report (SRSQ, SRSQ Report, or Service Quality Report), which also included a proposal for the Reconnect Pilot Program.

On July 30, 2018, the Energy CENTS Coalition (ECC or Energy CENTS) submitted Reply Comments detailing a number of concerns with the Company's SRSQ Report. ECC recommended that the Commission direct Minnesota Power to suspend all service disconnections pending an investigation into the Company's disconnection and reconnection practices, reject the Company's proposed Reconnect Pilot, and require Minnesota Power to report low-income Conservation Improvement Program (CIP) participation numbers by counting participants rather than measures.

On August 1, 2018, the Commerce Department, Division of Energy Resources (Department or DER) filed comments recommending that the Commission accept the Company's SRSQ Report, set 2018 reliability standards at 2017 levels, and provide more information about the Reconnect Pilot.

Reply Comments were filed on August 15th, 16th, and 20th, 2018, by the following organizations, respectively: Office of the Attorney General- Residential Utilities Division (OAG-RUD), Legal Services Adocacy Project (LSAP), Citizen's Utility Board (CUB), and the Minnesota Citizens Federation Northeast (Citizen's Federation), collectively referred to in these comments as the "Consumer Advocates." The Consumer Advocates agreed with ECC's concerns and recommendations.

On August 20, 2018, Minnesota Power filed Reply Comments addressing the concerns raised by Energy CENTS and responding to the Department's request for more information concerning the Reconnect Pilot. In those Reply Comments, Minnesota Power denied ECC's allegations and recommended that the Commission reject ECC's recommendations concerning an investigation. Minnesota Power further recommended that the Commission accept the proposed Reconnect

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Pilot and reject the Department's recommendation to set 2018 reliability standards at 2017 levels.

The Department now files these Response Comments, which address both Minnesota Power's Reply Comments and also the concerns raised by ECC and the Consumer Advocates. In Section II, the Department provides an analysis of these issues, and in Section III provides recommendations.

II. DEPARTMENT ANALYSIS

In Part A of this Section, the Department addresses Minnesota Power's August 20th Reply to the Department's August 1st Comments. In Part B, the Department addresses the following concerns raised by Energy CENTS and echoed by the Consumer Advocates: disconnection and reconnection practices and policies, disconnection data, reconnection data, conservation activities, and Minnesota Power's proposed Reconnect Pilot.

A. MP REPLY TO DEPARTMENT COMMENTS

1. Reliability Standards

In its August 1, 2018 Comments, the Department recommended that the Commission accept Minnesota Power's 2018 SRSQ for 2017 activities and set reliability standards for 2018 at 2017 levels. The Company disagreed, and argued that the Commission should return to its rolling 5-year average practice. The Company argues that the Commission froze 2017 goals at 2016 levels because the Company did not meet 2016 goals; but since the Company again did not meet 2017 goals, MP argues that the Commission should seek consistency between the set goals and realistic trends. The Company also argues that it is being penalized because its data looks worse as a result of more precise reporting due to incorporation of Advanced Metering Infrastructure (AMI).

The Department notes that when MP fails to meet its reliability goals, it is an indication that the Company should put more resources towards reliability practices. Lowering the goals when the Company is failing to meet its goals may incentivize the Company to maintain the status quo rather than invest in reliability. Therefore, keeping goals high will provide the Company an opportunity to demonstrate that it has adequately responded to the Commission's reliability concerns.

However, the Department is sympathetic to the Company's concern about AMI integration introducing a new element into reporting that was not there previously. Therefore, the Department suggests a compromise and recommends that the Commission set 2018 goals at an average between 2017 goals and the 5-year rolling average.

2. *Reconnect Pilot*

In its August 1st Comments, the the Department asked the Company to respond to a number of concerns regarding the Reconnect Pilot. This section details those concerns and the Company's responses.

- a. *The Department asked MP to detail challenges to restoring power via payment plans, describe MP's approach to offering payment plans outside the Cold Weather Rule (CWR) months, and explain how the Company intends to address these challenges going forward*

The Company provided a discussion of its procedures and also its work with the Commission's Consumer Affairs Office (CAO) in identifying and addressing challenges within the CARE program. The Department is satisfied with this response, and asks that the Company file any final report or documentation from its work with the CAO in the relevant year's SRSQ Report.

- b. *The Department asked MP to comment on whether it may be useful to extend the Reconnect Pilot Program to a control group of non-low-income customers*

ECC raised a concern about the effects of MP's Reconnect Pilot on low-income customers during MP's Rate Case proceeding (Docket No. E015/GR-16-664), so the Department's initial comments asked for further information. The Department suggested that, as a remedy to ECC's concerns and to collect better sampling results, the Company might also include a control group of non-low income customers. The Company responded that it queried the current population of meters with this capability and found that 25% are associated with customers who are not receiving benefits from the Low-Income Home Energy Assistance Program (LIHEAP). The Department notes that this percentage is likely to change over time, as the Company proceeds to install more remote-capable meters and as customers move to and from the households with those meters. Further, while LIHEAP is often considered an acceptable indicator of a customer's income, there are many low income customers who are not on LIHEAP.

Nonetheless, the Department concludes that the Company appears to have acceptably avoided placing remote-capable meters with solely low income customers. The Department recommends that, due to the likelihood that this figure will change over time, the Company

submit in its annual Service Quality Report the percentage of remote-capable customers who receive LIHEAP.

- c. The Department asked MP to comment on why a remote disconnection signal is needed to have a remote reconnection.*

The Company explained that “the technology entails an integrated switch built into the meter,” and stated:

Further, if a remote disconnection signal were not used, it may suggest a physical change to the meter in the field. Physically changing the state of the disconnect switch under the glass of the meter in the field is not an option. It would require breaking the tamper seals which is currently only done in the Company’s testing facility. Also, if the disconnection state the switch is in doesn’t match the last position of the switch that was in the meter’s memory, the meter locks out with an error and the switch is stuck in that state and is not operable. This type of event would require an immediate field visit for remediation.¹

The Department is satisfied with this response.

- d. The Department asked MP to provide support for a variance to Minnesota Rules, part 7820.2500 that would be required in order to implement the Reconnect Pilot Program.*

The Company states that it is not looking for a variance to the rules because using remote technology would not preclude an in-person visit. The Company intends to follow all Minnesota Rules.

The Department is satisfied with this response.

- e. The Department asked MP to submit a cost study detailing the costs of the four available reconnections: remote during business hours, remote during non-business hours, in-person during business hours, and in-person during non-business hours*

¹ MP Reply Comments, page 16.

In response, Minnesota Power did not provide a cost study, but did provide a description of costs involved in reconnecting customers in person. From the Department’s understanding, the following describes the costs outlined by the Company:

- Regular Business Hours: \$40-\$55/hour of Labor and Vehicle Costs
- After-Business Hours: \$109-\$154/2 hours of Labor and Vehicle Costs

Using 2014 data, the Company identified 237 reconnections that would be considered Reconnect Program-eligible customers. Of those 237, 95% of reconnections occurred during business hours and 5% occurred during non-business hours, which corresponds to approximately 225 reconnections and 12 reconnections, respectively. Therefore, total approximate costs for in-person reconnections in 2014 would be:

Table 1. MP’s Estimated 2014 Labor and Vehicle Costs to Reconnect Customers In-Person, Business Hours, Non-Business Hours, and Total

Labor and Vehicle Cost to Reconnect Customers in Person During Business Hours (2014)	Labor and Vehicle Cost to Reconnect Customers in Person During After-Business Hours (2014)	Total Labor and Vehicle Cost to Reconnect Customers (2014)
\$9,000-\$12,375	\$1,308-\$1,848	\$10,308-\$14,223

Assuming that In-Person Reconnect Fees during business hours are \$20 and In-Person Reconnect Fee during non-business Hours are \$100, the Company charged the following in fees:

Table 2. MP’s Estimated 2014 Fees Charged to Customers for In-Person Reconnections, Business Hours, Non-Business Hours, and Total

Fees Charged to Customers Reconnected In-Person During Business Hours	Fees Charged to Customers Reconnected In-Person During Non-Business Hours	Total Fees Charged to Customers
\$4,500	\$1,200	\$5,700

Therefore, Minnesota Power stated that these results leave “more than a \$4,700 to \$8,700 cost differential under these assumptions.”² The Company noted that these assumptions do not include the costs of overhead, or lost productivity or inefficiencies due to “break-in work.” Finally, the Company suggested that if further detail about costs is needed, it should be included as part of compliance reporting for the pilot in the annual SRSQ filing.

² MP Reply Comments, page 16.

The Department is not satisfied with this response for a number of reasons.

The Company only attempted to illustrate the costs of reconnecting customers in-person, but did not address the expected costs of reconnecting customers remotely. Table 3 below shows the four types of customer circumstances for which the Department requested information, and indicates the two covered by the Company’s response:

Table 3. Cost Information for Customer Circumstances Requested and Received

	Business Hours	Non-Business Hours
In-Person Reconnect	√	√
Remote Reconnect		

Information about costs of connecting remotely is needed to assess whether the proposed fees of the Reconnect Pilot would be reasonable. Without this information, it is unclear whether the Reconnect Pilot actually produces cost savings.

The Department notes that the Company actually appears to recover a higher percentage of its after-hours costs than business-hours costs, as demonstrated in the following table.

Table 4. 2014 Percentage of In-Person Reconnection Costs Recovered by Company Reconnection Fees, Business Hours, Non-Business Hours, Total

Percentage of Business Hour Costs Recovered	Percentage of Non-Business Hour Costs Recovered	Percentage of Total Costs Recovered
36%-50%	65%-92%	40-55%

These figures suggest that there may be more of a need to focus on reducing the costs of business-hour reconnections. Presumably, however, both business-hour and non-business-hour costs would be reduced if remote meters are installed; yet the Company has yet to demonstrate the cost savings. Thus, the Department cannot, as stated in our August 1, 2018 Comments, “verify that the reconnection cost savings associated with the proposed pilot are properly reflected in the pilot’s reconnect fee.”

However, as the Company points out, not all costs affiliated with reconnections are actually recovered from the customers who cause such costs. In a rate case, the remaining unrecovered costs are embedded in base rates that are charged to all customers. In theory, the Company should report net reconnection costs (reconnection costs less reconnection fee revenue) as costs eligible for recovery through base rates; this approach ensures that no double recovery takes place. If the Reconnect Pilot does in fact produce cost savings, then a greater percentage of reconnection costs will be recovered by the cost causers via reconnection fees. This cost

savings would then be expected to reduce net reconnection costs in the Company's next rate case.

Therefore, the Company not only needs to demonstrate how the cost of remotely reconnecting customers would produce cost savings, but also needs to show how this impact would be realized in the Company's next rate case.

Finally, the Department does not support the Company's suggestion to wait to look into further cost detail in a future compliance filing; doing so would defeat the point of using a cost study to help the Commission make a decision about whether or not to move forward with the program.

The Department concludes that while the Reconnect Program logically sounds more cost effective than the current reconnection practices, the Company has not adequately demonstrated it to be so. Therefore, the Department recommends that the Commission deny the Company's proposed Reconnect Program, unless the Company submits an adequate cost study detailing the marginal cost of serving each type of customer circumstance identified in Table 3 above, and demonstrates how this program would result in a reduction of net reconnection costs captured in the Company's next rate case.

f. The Department requested that the Company remove the proposed tariff change language from Section VI, page 3.5, Regulation 20.A and create a new standalone tariff page dedicated to the Reconnect Pilot

The Company submitted a new standalone tariff page. The Department thanks the Company and is satisfied with the new page.

B. ENERGY CENTS AND CONSUMER ADVOCATES CONCERNS

1. Disconnection and Reconnection Policies and Practices

a. Full Payment of Arrears Required for Reconnection during Non-CWR Months

ECC contends that Minnesota Power's practice of making disconnected customers pay the full balance of their bill to get reconnected during non-Cold Weather Rule (CWR) months violates Minnesota Statute 216B.098 (subd. 3).

As evidence, ECC shows various Information Requests (IRs) and interactions with the Company. Later in the comments, ECC also notes that in one IR, the Company states that payment agreements are only offered to disconnected customers during CWR months. ECC recommends that the Commission interpret Minnesota Statute 216B.098 (subd. 3) to mean that disconnected customers must be offered a payment plan. The OAG-RUD, LASP, CUB, and the Citizen's Federation all agree with Energy CENTS's assessment and recommendation.

In Reply to this allegation, Minnesota Power contended that it has not violated statute because the Company does offer payment plans to disconnected customers—they simply do so prior to the customer being disconnected.

The Department notes that while Minnesota Power does appear to be requiring disconnected customers to pay their balance in full during non-CWR months, this policy does not appear to be uniformly applied to all disconnected customers. The Company has consistently reported a number of customers who were restored to service by entering a payment plan each year, as shown in the following table:

Table 5. Number and Percentage of Disconnected Customers Restored to Service by Entering a Payment Plan, 2003-2017

Year	Customers Disconnected	Customers Restored by Entering Payment Plan	Percentage of Customers Restored by Entering Payment Plan
2003	2,010	120	6.0
2004	2,042	41	2.0
2005	2,279	64	2.8
2006	2,315	83	3.6
2007	3,038	171	5.6
2008	3,293	204	6.2
2009	3,229	311	9.6
2010	2,853	297	10.4
2011	3,009	331	11.0
2012	3,518	569	16.2
2013	3,171	576	18.2
2014	3,257	443	13.6
2015	5,20	56	10.8
2016	1,933	634	32.8
2017	2,668	1,680	63.0

At the same time, the Company stated that it only *recently* began including in this count customers who were restored via payment plan under the CWR. Since the Company appears to have begun this new data procedure in 2015, it stands to reason that disconnected customers restored via payment plan prior to 2015 were restored during non-CWR months.

The Department concludes, therefore, that in non-CWR months, Minnesota Power appears to be treating disconnected customers who seem to be similarly situated differently. While concerning, this conclusion does not answer the question of whether the Company *should* be offering payment plans to disconnected customers during non-CWR months.

To this point, Company and the Consumer Advocates disagree on the interpretation of Minn. Stat. 216B.098 (subd. 3), which states:

A utility shall offer a payment agreement for the payment of arrears. Payment agreements must consider a customer's financial circumstances and any extenuating circumstances of the household. No additional service deposit may be charged as a consideration to continue service to a customer who has entered and is reasonably on time under an accepted payment agreement.

Upon reviewing the statute, the Department observes that careful reading of the statute indicates that requiring payment in full prior to reconnection does not *necessarily* violate this statute. For example, if a customer is in arrears, MP must offer a payment agreement that considers the "customer's financial circumstances and any extenuating circumstances of the household." If such a customer enters into a payment agreement and is later disconnected during non-CWR months due to not being "reasonably on time under an accepted payment agreement," the statute doesn't prohibit MP from requiring payment in full prior to reconnection during non-CWR months. Thus, Minn. Stat. 216B.098 is vague enough that reasonable parties may interpret it differently as to its application during non-CWR months.³ In contrast, the CWR statute (Minn. Stat. 216B.096) is not vague on this front, as it requires utilities to offer payment plans to disconnected customers during the CWR months. The Department discusses the CWR below.

Even though it appears that MP has not violated Minn. Stat. 216B.098 during non-CWR months, the Department is sympathetic to the Consumer Advocates' arguments, not due to statutory reasons, but instead due to reasons of public policy. If MP's practice is to ask disconnected low-

³ It may even be that Minn. Stat. 216B.098 (subd. 3) was written in an intentionally vague manner so as to give utilities and the Commission flexibility in the statute's application. It appears that to date, since Minnesota Power has worked with the Commission's CAO on the issue of full payment prior to reconnection, the Commission has operated under the de facto assumption that the statute does not necessarily require a payment plan to be offered to disconnected customers.

income customers to pay for their balance in full prior to being reconnected, rather than, say, enter into a new payment plan, such a policy seems to emphasize punishment over resolution, particularly if customers did not previously enter into payment plans (for whatever reason), or if customers have been reasonably on time in payments in the past. As Minnesota Power has recognized, “The disconnection of a customer’s service is the Company’s most costly course of action and therefore, disconnection is the Company’s last resort in remedying past due payments.”⁴

Minn. Stat. 216B.098 does not require customers to enter into a payment plan, and thus customers may either choose not to do so or not be fully cognizant about their options, despite the notices, due to numerous circumstances. If for any reason a customer has not entered into a payment plan prior to being disconnected, they should be able to re-establish service by entering into a payment plan after they have been disconnected. If it’s okay that one day a customer may enter into a payment plan, and the next day may not because they’ve been disconnected, *even though they may owe the same amount on each day*, there must be a meaningful difference between those customers to warrant the disparity in treatment.

If that is in fact the Company’s practice, MP appears to be offering the justification that the disconnected customer has had multiple instances to enter into a payment arrangement and has not pursued them. However, the Department would argue that being disconnected may provide the necessary motivation for the customer to finally enter into a payment arrangement or even enter into a new payment agreement. Therefore, if a disconnected customer is willing to enter into a payment agreement, there is no meaningful difference between the connected and disconnected customers. Further, being disconnected is already a significant punishment for failing to enter into a payment plan; requiring balance paid in full on top of disconnection not only adds a second layer of punishment but doesn’t seem practical. For certain types of disconnected customers- such as those willing to enter into payment agreements, or those for whom disconnection is a first time occurrence- jumping two steps up in punishment seems excessively harsh.

Thus, the Department concludes that the Company has not offered a meaningful distinction between connected and disconnected customers that justifies why one but not the other should be permitted to enter into a payment plan. Further, the Department concludes that Minnesota Power’s policy of requiring balance paid in full prior to reconnection is overly punitive especially towards first-time disconnections and towards customers who become motivated to enter into a payment plan once disconnected.

⁴ MP’s November 4, 2015 Supplemental Comments, Docket No. E015/M-15-323, page 2.

Therefore, the Department recommends that the Commission direct the Company to offer payment plans to all disconnected customers during non-CWR months, unless that customer has a history of repeatedly breaking payment plans or repeatedly being disconnected for nonpayment.

b. Reconnection during CWR Months

As to the CWR, there was a question as to whether MP was complying with this statute. Specifically, ECC questioned: "If a customer establishes a payment agreement under the CWR, it is unclear how the Company is complying with the CWR statute if they are disconnecting that customer in the same month in which that plan was established."⁵ MP's response was that:

ECC calls into question how the Company is complying with the CWR statute if they are disconnecting the customer in the same month in which that plan was established. Minnesota Power would suggest that ECC has answered their own question. A customer may have been disconnected in a given month and then reconnected through a payment agreement in that same month. As such, it would stand to reason that both would be reported in that month.⁶

MP appears to be saying that the disconnected customers entered into a payment plans after they were disconnected. However, MP's response needs clarification. Thus, MP should answer these questions regarding customer disconnects occurring in the same month in which a payment plan was executed:

1. How many of these disconnections occurred during CWR months? How many during non-CWR months?
2. Did MP offer a payment plan to every customer who was disconnected prior to their disconnection?
3. If not, why not?
4. If so, how many customers chose to enter into a payment plan? For any customers who did not have payment plans, does MP have information as to why the payment plans were not executed?
5. Did MP reconnect every customer after a payment plan was executed? If not, why not?
6. Did MP disconnect any customer who had entered into a payment plan in the same month *after* that the customer entered into a payment plan? If so, why?

⁵ ECC's July 30, 2018 Comments, pages 8-9. Other parties raised similar questions.

⁶ MP's August 20, 2018 Reply Comments, page 5.

Answers to these questions would be helpful for this record.

c. Timeliness of Payment Plan Offers

Energy CENTS alleges that Minnesota Power is not proactive enough about offering customers payment plans to prevent disconnection. As evidence to this point, Energy CENTS cites that the Company's disconnections went up significantly from 2016 to 2017. ECC also points to the fact that 32.5% of disconnections occur during CWR months, and that the average past due amounts and days past due are high. ECC recommends that the Commission look into MP's payment plan practices, as part of the wider recommended investigation. LSAP, CUB, and the Citizen's Federation also expressed concern regarding the timeliness of MP's offering of payment plans.

The Department also requested more information regarding this process from the Company. In Reply Comments to this allegation, the Company provided a discussion on the pre-disconnection procedures, stating that customers are encouraged to enter into payment plans throughout the billing, past due notice, credit and collections, and disconnection notice steps. MP appears to offer payment plans via mail, ebill (where applicable), Interactive Voice Response call, and in-person visits. In its initial filing and Reply Comments, the Company provided procedural flow charts, as well as example bills, notices, pamphlets, and the Company's annual CWR notice. Finally, the Company stated that it has been collaborating with the Commission's CAO office to reach low income customers more effectively regarding the Company's CARE program; this process has involved discussion of disconnection processes.

The Department notes that it may be beneficial for the CAO and the Company to elicit feedback from the Consumer Advocates during this process, and, as mentioned previously in Part A.2.a., requests that MP file any final report or document resulting from this process in the appropriate year's Service Quality filing.

Minnesota Power further addressed Energy CENTS's timeliness concern as follows:

As reported in the Company's most recent SRSQ, an overwhelming majority of customers that receive a notice of proposed disconnection are able to prevent disconnection by making a payment plan or bringing their account current. In fact, the majority of customers who received notices in 2017 were not actually disconnected from service.⁷

⁷ MP Reply Comments, page 7.

The Department notes that this statement is not entirely accurate, as the Company reports the number of customers who were *restored* from disconnection by entering into a payment plan, not the number of customers *prevented* from disconnection by entering a payment plan. In its August 1, 2018 Comments, the Department commented that the Company's record on percentage of customers restored by entering into a payment plan has improved in recent years—however, given the Company's concurrent changes in data reporting for reconnections, the Department concluded:

Therefore, it is unclear to the Department whether the Company has actually been improving in its attempts to enter into payment plans with disconnected customers, or whether the Company's numbers improved simply because MP is now classifying more customers (those entering payments plans in CWR months) as "Customers Entering into Payment Plan."⁸

The Department maintains that this information continues to be unclear. Presumably, however, if the Commission decides to direct the Company to offer payment plans to disconnected customers during non-CWR months (rather than requiring these customers to pay their balance in full), the Company's record on this front will continue to improve.

As to the Consumer Advocates' main concern, however, which appears to be whether MP is offering payment plans as a preventative measure prior to disconnection, there appears to be no current indicator. The Department notes that the Company reports both the annual number of customers who received disconnection notices but were not subsequently disconnected,⁹ and the annual number of customers who sought CWR protection. However, neither of these measurements quite captures the number of customers who avoided disconnection by entering a payment plan. The number of customers who received disconnection notices but were not subsequently disconnected likely includes customers who simply paid their past due amounts without a payment plan, and so measurement is too broad in scope of a measurement. The number of customers who sought CWR protection presumably consists largely of preventative payment plan customers—but only during the CWR months. This measurement is therefore too narrow in scope. The best indicator of how proactive the Company is in its payment plan outreach is the number of customers who avoided disconnection by entering into a payment plan, which is not currently reported by the Company.

⁸ Department Comments, page 20-21.

⁹ The Company reports the number of customers who received disconnection notices and the number of customers who were involuntarily disconnected; the number of customers who received disconnection notices but were not disconnected can thus be inferred by subtracting the number disconnected from those who received disconnection notices.

The Department therefore concludes that it is unclear how proactive the Company has been in offering payment plans to prevent disconnection because there is currently no reported measurement of this activity. The Department recommends that the Commission direct the Company to begin reporting this number in future Service Quality Reports.

d. Payment Plan Terms

ECC stated that when Minnesota Power does offer payment plans to customers, these offers do not adequately take into account the customer's financial circumstances. As evidence to this point, Energy CENTS cited to an IR that stated that payment plans can be set to weekly, bi-weekly, or monthly schedules. The variation and frequency in payment schedules appears to be Energy CENTS's greatest concern here. ECC recommended that the Commission look into MP's payment plan practices, as part of the wider recommended investigation. ECC further recommended that the Commission require the Company to provide total amounts of payment scheduled each month, and to explain how bi-weekly payment terms are sensitive to a customer's financial circumstances.

The Department does not see a problem with offering different types of plans to different customers based upon each customer's financial circumstances. The Department would further note that the term "bi-weekly" may be used either to mean "twice a week" or "every other week." Absent more evidence, the Department does not see a reason to examine this issue more closely.

e. Reliance on LIHEAP

Energy CENTS appears to argue that the Company relies too heavily on the receipt of LIHEAP for reconnection, and recommends that "the Company's reliance on LIHEAP and LIEHAP crisis funds as a means for restoring customer service" be investigated as part of the wider proposed Commission investigation.¹⁰

The Department provides the following table detailing MP LIHEAP funds received in recent years:

¹⁰ Energy CENTS Comments, page 18.

Table 6. LIHEAP Funds Received by Minnesota Power, 2014-2017¹¹

Year	LIHEAP Funds	LIHEAP Crisis Funds	Total
2014	\$1,597,377.50	\$548,366.78	\$2,145,744.28
2015	\$1,420,138.56	\$404,237.98	\$1,824,376.54
2016	\$1,423,897.48	\$1,020,663.42	\$2,444,560.90
2017	\$1,728,835.89	\$573,207.91	\$2,302,043.80

In response to Energy CENTS, the Company states that it is not MP, but the customers who are relying on LIHEAP funds.

Energy CENTS's arguments are not clear. The fact that the Company relies on LIHEAP funds for reconnection is not in and of itself a problem that needs to be corrected. It is logical that if the Company requires payment in full prior to reconnecting customers, the Company and customer would rely partially on LIHEAP funds for reconnection. Further, if the number of disconnections increases, it would make sense that the Company must rely on LIHEAP funds even more (subject to funding availability), as the dollar amount needed to reconnect more customers would increase.

Instead, it appears that, broadly speaking, these are the actual problems: that there a couple thousand customers disconnected each year, and that only a fraction of those customers are reconnected within 24 hours. Both of these problems stem largely from a customer's inability to pay; the solutions, therefore, need to increase resources to low-income customers and decrease barriers to low-income customer payment. The Company and customer use and reliance on LIHEAP funds is a resource--not a barrier--thus does not need to be corrected.

However, the Department notes that there is an additional potential resource not yet discussed in this docket that may help mitigate disconnections in the first place, and that is the Company's proposal to automatically enroll all LIHEAP customers in the Company's CARE program, which is a topic being discussed in Docket 11-409. In that Docket, the Company identified approximately 5,000 LIHEAP customers not enrolled in CARE who would benefit from the CARE program. Additionally, the Department notes that reducing the administrative burden of the Company by not requiring a separate CARE application would open up Company resources and allow Minnesota Power to focus more heavily on outreach and disconnection prevention.

¹¹ MP Response to ECC Information Request No. 6 in instant docket, 18-250. MP stated in that IR response: "Minnesota Power is not able to distinguish 'LIHEAP crisis funds' from other LIHEAP dollars in its Customer Information System ('CIS'). The information provided below is taken directly from the eHeat website and is not cross-referenced with the Company's CIS data for the reason stated above."

Thus, the Department recommends that the Commission reject Energy CENTS’s proposal to examine the Company’s reliance on LIHEAP and LIHEAP crisis funds, and recommends that the Company give greater weight to the Company’s CARE proposal in Docket 11-409.

2. *Reconnection Data*

The Consumer Advocates appear to have two primary concerns with the reconnection data. The first is how the Company corrected its data from 29.6% to 73.37% in 2015 and from 11% to 51.29% in 2016. The second is that Energy CENTS believes the data is suspect because the data does not align with historical trends of reconnections and LIHEAP funds. ECC recommends that the Commission should not rely on the Company’s data but instead the Commission should require an external audit. ECC also recommends that the Commission require the Company to provide more information about the revisions implemented in correcting the data. The OAG-RUD, LSAP, CUB, and the Citizen’s Federation all echoed ECC’s concerns and agreed with ECC on the remedy.

The Department traced back the Company’s final correct figures for 2015 and 2016 to where the figures came from. Before addressing ECC’s concerns, the Department provides the following background of MP’s corrected data. The Department follows this discussion first by addressing ECC’s concerns about the nature of data corrections, then by addressing historical trends.

a. *Background of 2015 and 2016 reconnection data*

In the Company’s 2016 Service Quality Report (Docket 16-268), the Company submitted this data for 2015:

Table 7. MP’s Initial 2015 Disconnection/Reconnection Data from 2016 SRSQ (16-268)

2015 INVOLUNTARY DISCONNECT REPORT														
Month	# Customers Receiving Disconnection Notices			# Customers requested CWR Protection	# Customers Granted CWR Protection	# Customers Disconnected Involuntarily			# Customers Restored within 24 Hours			# Customers Restored to Service by entering into a Payment Plan		
	Res	Com	Ind	Res Only	Res Only	Res	Com	Ind	Res	Com	Ind	Res	Com	Ind
Jan	3335	884	18	434	434	60	2	0	12	0	0	7	0	0
Feb	5978	534	10	324	324	34	3	0	9	0	0	6	0	0
Mar	4531	651	17	70	70	0	4	0	1	0	0	2	0	0
Apr	3989	843	12	2	2	0	3	0	0	0	0	2	0	0
May	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Jun	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Jul	853	109	3	0	0	44	0	0	11	2	0	0	0	0
Aug	403	61	0	0	0	142	0	0	22	0	0	0	0	0
Sep	400	107	0	0	0	57	0	0	23	1	0	0	0	0
Oct	692	98	3	271	271	44	0	0	3	1	0	18	0	0
Nov	1348	113	2	586	586	77	4	0	36	0	0	7	0	0
Dec	1008	124	0	486	486	62	0	0	37	0	0	14	0	0
Totals	22537	3524	65	2173	2173	520	16	0	154	4	0	56	0	0

From this data, we can calculate that, of residential customers receiving a disconnect notice in 2015, 29.6% were reconnected in 24 hours (154 residential customers restored within 24 hours/520 residential customers disconnected involuntarily).

In the Company’s 2017 Service Quality Report (Docket 17-252), the Company submitted this data for 2016:

Table 8. MP’s Initial 2016 Disconnection/Reconnection Data from 2017 SRSQ (17-252)

Month	Customers Receiving Disconnection Notices			Customer s who sought CWR Protection	Customer Disconnected Involuntarily			Customers Restored within 24 Hours			Customers restored to service by entering into a Payment Plan		
	Residential	Commercial	Industrial		Residential	Commercial	Industrial	Residential	Commercial	Industrial	Residential	Commercial	Industrial
January	969	70	2	436	78	4	0	8	0	0	24	2	0
February	1,072	63	3	416	104	2	0	5	0	0	30	0	0
March	1,012	76	2	388	115	2	0	21	0	0	33	0	0
April	1,114	65	2	93	154	3	0	8	0	0	48	1	0
May	1,540	107	3	1	358	9	0	28	0	0	124	2	0
June	1,013	78	1	1	320	9	0	36	1	0	114	1	0
July	989	67	4		119	1	0	15	0	0	44	1	0
August	802	62	4		326	8	0	12	0	0	93	4	0
September	699	54	0	1	199	4	0	19	0	0	52	0	0
October	924	74	2	384	59	3	0	27	1	0	27	1	0
November	1,113	87	4	653	43	5	0	22	0	0	22	0	0
December	945	66	2	543	59	3	0	12	0	0	23	1	0

From this data, we can calculate that, of residential customers receiving a disconnect notice in 2016, 11% were reconnected in 24 hours (213 residential customers restored in 24 hours/1,933 residential customers disconnected involuntarily).

In the Company’s 2016 Rate Case (Docket 16-664), ECC asked in IR 12 that the Company confirm the following percentages of customers reconnected in 24 hours: 35.4% in 2013, 24.5% in 2014, 29.6% in 2015, and 11% in 2016. In its response on April 19, 2017, the Company stated that it provided incorrect data in both the 2016 and 2017 filings (which refer to the 2015 and 2016 data, respectively), and stated that the corrected figures were 73.5% in 2015 and 50.6% in 2016.¹²

In the April 19th Response to ECC IR#12, the Company provided the following 2015 corrected data:

¹² Note that the Company actually stated that the corrected figures were for years 2016 and 2017, but these years referred to the filing years, rather than the years that the data reflects. For clarity, the Department is using the years the data reflects.

Table 9. MP's Corrected 2015 Disconnection/Reconnection Data from April 19th, 2017 Response to ECC IR#12 in Company's 2016 Rate Case (16-664)

2015 Involuntary Disconnection Report Submitted for SRSQ April 1, 2016													
Month	Customers Receiving Disconnection Notices			Customers Who Sought CWR Protection	Customers Disconnected Involuntarily			Customers Restored within 24 hours			Customers Restored to Service by entering into a payment plan		
	Res	Com	Ind	Res Only	Res	Com	Ind	Res	Com	Ind	Res	Com	Ind
Jan	3335	884	18	434	60	2	0	12	0	0	7	0	0
Feb	5978	534	10	324	34	3	0	9	0	0	6	0	0
Mar	4531	651	17	70	0	4	0	1	0	0	2	0	0
Apr	3989	843	12	2	0	3	0	0	0	0	2	0	0
May *	0	0	0	0	0	0	0	0	0	0	0	0	0
Jun *	0	0	0	0	0	0	0	0	0	0	0	0	0
Jul *	628	64	3	0	72	0	0	70	0	0	0	0	0
Aug *	326	40	0	1	233	5	0	221	0	0	1	0	0
Sep *	332	66	1	2	79	0	0	78	4	0	0	0	0
Oct *	604	64	3	267	64	0	0	55	0	0	12	0	0
Nov	1180	64	2	574	81	1	0	30	0	0	5	0	0
Dec	908	77	1	476	67	0	0	31	0	0	10	0	0
Totals	21811	3287	67	2150	690	18	0	507	4	0	45	0	0

* Transition to new Customer Information System. Collections on hold until July 5, 2015. Limited collection activity and disconnections from July to October 15, 2015.

* The method of measuring reconnections with a payment plan was not created in our new CIS until October 13, 2015, and relies on the agent to enter a specific customer contact.

From this data, we can calculate that, of residential customers receiving a disconnect notice in 2015, 73.48% were reconnected in 24 hours (507 residential customers restored in 24 hours/690 residential customers disconnected involuntarily). The Company reported this figure as 73.5%.

In its April 19th Response to ECC IR #12, the Company also submitted the following 2016 corrected data:

Table 10. MP's Corrected 2016 Disconnection/Reconnection Data from April 19th, 2017 Response to ECC IR#12 in Company's 2016 Rate Case (16-664)

2016 Involuntary Disconnection Report Submitted for SRSQ April 1, 2017													
Month	Customers Receiving Disconnection Notices			Customers Who Sought CWR Protection	Customers Disconnected Involuntarily			Customers Restored within 24 hours			Customers Restored to Service by entering into a payment plan		
	Res	Com	Ind	Res Only	Res	Com	Ind	Res	Com	Ind	Res	Com	Ind
Jan	968	71	2	436	82	4	0	41	3	0	11	0	0
Feb	1072	63	3	416	104	3	0	47	0	0	7	0	0
Mar	1012	76	2	388	129	2	0	51	0	0	24	0	0
Apr	1114	65	2	93	160	3	0	85	1	0	9	0	0
May	1540	107	3	1	358	9	0	202	2	0	35	0	0
Jun	1013	78	1	1	320	9	0	179	2	0	38	1	0
Jul	988	68	4	0	119	1	0	60	1	0	17	0	0
Aug	802	62	4	0	325	9	0	142	7	0	13	0	0
Sep	698	54	0	1	199	4	0	97	0	0	23	0	0
Oct	923	75	2	384	72	3	0	40	1	0	33	1	0
Nov	1113	87	4	653	64	6	0	34	2	0	28	0	0
Dec	945	66	2	543	76	3	0	38	2	0	17	0	0
Totals	12188	872	29	2916	2008	56	0	1016	21	0	255	2	0

From this data, we can calculate that, of residential customers receiving a disconnect notice in 2016, 50.60% were reconnected in 24 hours (1,016 residential customers restored in 24 hours/2,008 residential customers disconnected involuntarily). The Company reported this figure as 50.6%.

On May 19th, 2017, the Company provided a supplemental response to ECC IR 12. In this supplement, the Company issued a correction to its April 19th Response, and stated that in fact, 52% of residential disconnected customers in 2016 were reconnected within 24 hours. The Company resubmitted its data for both 2015 and 2016.

In its May 19th Supplemental Response to ECC IR#12, MP submitted the following data for 2015. This is the same data that appears in Schedule 1 of ECC’s July 30th Comments in the instant docket:

Table 11. MP’s Final, Corrected 2015 Disconnection/Reconnection Data from May 19th, 2017 Supplemental Response to ECC IR#12 in Company’s 2016 Rate Case (16-664)

2015 Involuntary Disconnection Report Submitted for SRSQ April 1, 2016													
5/1/2017	Customers Receiving Disconnection Notices			Customers Who Sought CWR Protection	Customers Disconnected Involuntarily			Customers Restored within 24 hours			Customers Restored to Service by entering into a payment plan		
Month	Res	Com	Ind	Res Only	Res	Com	Ind	Res	Com	Ind	Res	Com	Ind
Jan	3335	884	18	434	60	2	0	12	0	0	7	0	0
Feb	5978	534	10	324	34	3	0	9	0	0	6	0	0
Mar	4531	651	17	70	0	4	0	1	0	0	2	0	0
Apr	3989	843	12	2	0	3	0	0	0	0	2	0	0
May *	0	0	0	0	0	0	0	0	0	0	0	0	0
Jun *	0	0	0	0	0	0	0	0	0	0	0	0	0
Jul *	628	64	3	0	72	0	0	70	0	0	0	0	0
Aug *	326	40	0	1	233	5	0	221	0	0	1	0	0
Sep *	332	66	1	2	79	0	0	78	4	0	0	0	0
Oct *	604	64	3	267	64	0	0	55	0	0	12	0	0
Nov	1180	64	2	574	81	1	0	30	0	0	5	0	0
Dec	908	77	1	476	67	0	0	31	0	0	10	0	0
Totals	21811	3287	67	2150	691	14	0	507	4	0	45	0	0
* Transition to new Customer Information System. Collections on hold until July 5, 2015. Limited collection activity and disconnections from July to October 15, 2015.													
* The method of measuring reconnections with a payment plan was not created in our new CIS until October 13, 2015, and relies on the agent to enter a specific customer contact.													

The change from the April 19th data (for 2015) to the May 19th data (for 2015) is that the Company added one additional residential customer to those disconnected involuntarily. From this data, we can calculate that, of residential customers receiving a disconnect notice in 2015, 73.37% were reconnected in 24 hours (507 residential customers restored in 24 hours/691 residential customers disconnected involuntarily). However, although MP submitted corrected data on May 19th, the Company did not appear to correct its final percentage number, which the Company continued to report as 73.5%.

In its May 19th Supplemental Response to ECC IR#12, MP submitted the following data for 2016. This is the same data that appears in Schedule 1 of ECC’s July 30th Comments in the instant docket:

Table 12. MP’s Final, Corrected 2016 Disconnection/Reconnection Data from May 19th, 2017 Supplemental Response to ECC IR#12 in Company’s 2016 Rate Case (16-664)

2016 Involuntary Disconnection Report Submitted for SRSQ April 1, 2017													
Month	Customers Receiving Disconnection Notices			Customers Who Sought CWR Protection	Customers Disconnected Involuntarily			Customers Restored within 24 hours			Customers Restored to Service by entering into a payment plan		
	Res	Com	Ind	Res Only	Res	Com	Ind	Res	Com	Ind	Res	Com	Ind
Jan	968	71	2	436	82	4	0	41	3	0	11	0	0
Feb	1072	63	3	416	104	3	0	47	0	0	7	0	0
Mar	1012	76	2	388	129	2	0	51	0	0	24	0	0
Apr	1114	65	2	93	160	3	0	85	1	0	9	0	0
May	1540	107	3	1	358	9	0	202	2	0	35	0	0
Jun	1013	78	1	1	320	9	0	179	2	0	38	1	0
Jul	988	68	4	0	119	1	0	60	1	0	17	0	0
Aug	802	62	4	0	325	9	0	142	7	0	13	0	0
Sep	698	54	0	1	199	4	0	97	0	0	23	0	0
Oct	923	75	2	384	72	3	0	40	1	0	33	1	0
Nov	1113	87	4	653	64	6	0	34	2	0	28	0	0
Dec	945	66	2	543	76	3	0	38	2	0	17	0	0
Totals	12188	872	29	2916	1981	50	0	1016	21	0	255	2	0

The change from the April 19th data (for 2016) to the May 19th data (for 2016) is that the Company subtracted 27 residential customers from those disconnected involuntarily. From this data, we can calculate that, of residential customers receiving a disconnect notice in 2016, 51.29% were reconnected in 24 hours (1,016 residential customers restored in 24 hours/1,981 residential customers disconnected involuntarily). The Company reported the corrected figure as 52%. It is unclear to the Department why the Company chose to round up in this instance; correct rounding would result in 51%.

Therefore, the Company concluded in ECC IR #12 in the Rate Case by stating that the 2015 figure was 73.5% and the 2016 figure was 52%. The Department notes that both of these figures are slightly incorrect, as the 73.5% figure reflects the original April 19th response to ECC IR#12, and the 52% figure was improperly rounded. Instead, these figures should have been 73% and 51% for 2015 and 2016, respectively.

On August 9, 2017, the Company filed Supplemental Comments in the 2016 and 2017 Service Quality Dockets (16-268 and 17-252, respectively), stating the updated percentages of 73.5% and 52%. The Company did not provide the accompanying data.¹³

¹³ In the Supplemental Comments of those Dockets, the Company refers to a spreadsheet Attachment, but did not appear to attach anything.

On May 9th, 2018, in the instant docket, Energy CENTS asked MP to verify that the percentages for 2015 and 2016 were 73.5% and 50.6%, respectively. However, those percentages reflect the data that MP submitted to ECC IR#12 in the original response on April 19th, but do not reflect the May 19th response data. The Company responded in the instant docket on May 21, 2018, providing the May 19th Response data, and stated that the corrected figures for 2015 and 2016 are 73.37% and 51.29%, respectively. The Department notes that these are the correct figures that should have been reported in the May 19th response.

Given the above series of events, the Department can understand why there was confusion regarding the actual percentages for residential customers reconnected within 24 hours.

b. Nature of corrections

The Consumer Advocates expressed concern as to the accuracy of MP’s corrected disconnection and reconnection data. The Department summarizes the original figures and corrected figures below:

Table 13. Change from MP’s Initial to Final Corrected Disconnection/Reconnection Data, 2015 and 2016

	Initial			Final Corrected			Initial to Final Corrected
	Residential Disconnections	Residential Customers Reconnected in 24 Hours	Percentage of Disconnected Residential Customers Reconnected in 24 Hours	Residential Disconnections	Residential Customers Reconnected in 24 Hours	Percentage of Disconnected Residential Customers Reconnected in 24 Hours	Percentage Increase, Initial to Final Corrected
2015	520	154	29.6%	691	507	73.37%	147.9%
2016	1,933	213	11%	1,981	1,016	51.29%	366.3%

While MP should have reported correct data rather than mis-reporting multiple times, the previous section traces these corrections through to their origins. Certainly, MP needs to improve its tracking and reporting. The issue at question, therefore, is more about the nature of the changes in data reporting.

The Company states that the corrections were due to the following reporting changes:

- Prior to 2015, some reports counted date of disconnection in the Company’s system, while others counted the date of disconnection in the field. The Company has decided

- to use the date the disconnection occurred in the field, and corrected the 2015 and 2016 data to account for this fact.
- Prior to 2015, some reports did not count disconnections in which one customer was disconnected and another customer was started at the same location; the Company is now including these, and corrected the 2015 and 2016 data to account for this fact.
- Some reports did not count disconnections where a payment plan was created under the CWR in the same month; the Company is now including these, and corrected the 2015 and 2016 data to account for this fact.

The Department notes that the first of these changes (recording the field disconnection date versus the field and/or system disconnection dates) should largely result in *shifts* of disconnection numbers between years, rather than an *increase* in the total number of disconnections. In an email to the Department, the Company clarified that of these reporting changes, it was the third of these changes (counting disconnections where a payment plan was created under the CWR in the same month) that had the largest impact on the data; the other two changes had fairly minimal impacts.¹⁴

The Department is generally satisfied with this response, and appreciates that the Company took measures to standardize its reporting and correct figures when mistakes were found during the rate case proceeding.

c. The Company's corrected data and historical trends

In the instant docket, ECC contended that MP's 2015 and 2016 corrected reconnection data is suspect because it does not align with historical trends. Specifically, ECC noted that reconnections within 24 hours tend to correlate with receipt of LIHEAP crisis funds. Energy CENTS recommended that the Commission require the Company to describe how the revisions resulted in the two graphs presented below:

¹⁴ See Attachment 1 to these Response Comments.

Figure 1. MP Non-Corrected LIHEAP Funds and Reconnections, Submitted to Energy CENTS in April 19, 2017 Response to ECC IR#12 During 2016 Rate Case (16-664)

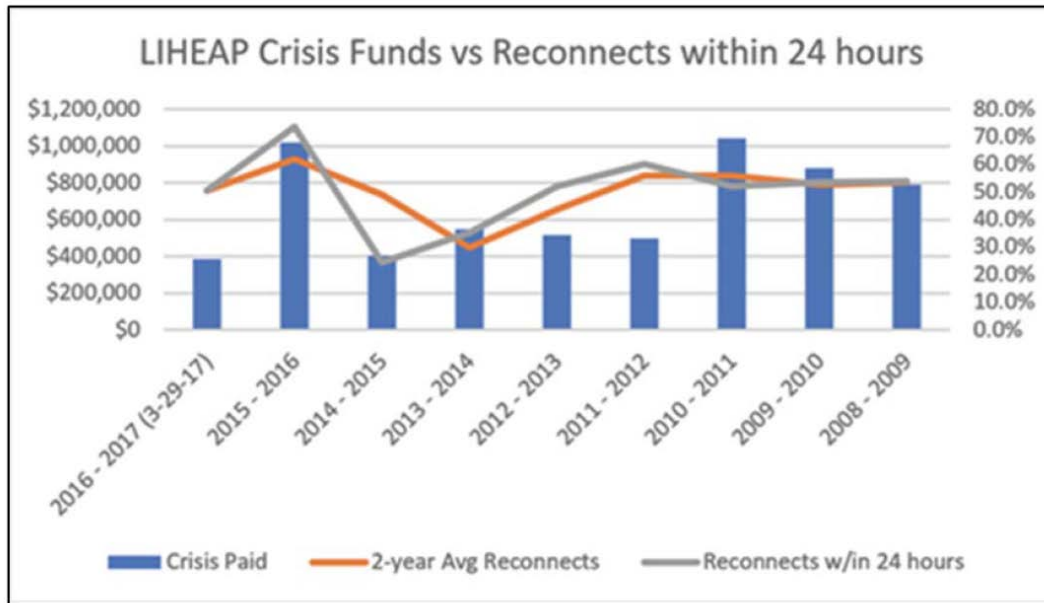
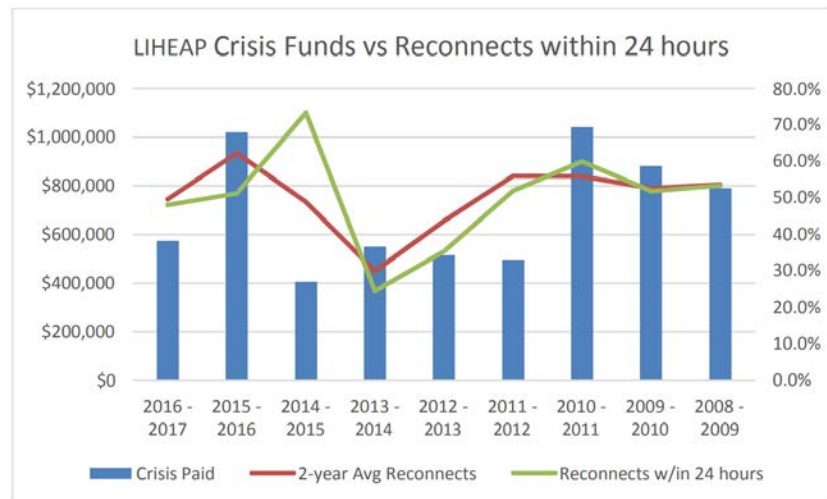


Figure 2. MP Corrected LIHEAP Funds and Reconnections, Submitted to Energy CENTS in May 21, 2018 Response to ECC IR#3 in Instant Docket (18-250)



In Reply Comments, the Company stated that 2015 data cannot be compared to other years because there was a system upgrade in May 2015. As a result, there were no May-June 2015 disconnects. The Department notes that based on the data provided in response to ECC#12

during the Rate Case, it also appears that disconnections and collections activities were minimal from July through October of 2015 (with the exception of August, it appears). This information means that 2015 disconnection figures are abnormally low from May through October of 2015.

However, the Department notes that while MP appears to have updated its procedures for years 2015 and 2016, the Company informed the Department via email that no data prior to May 2015 was corrected.¹⁵ Therefore, it is inappropriate to compare pre- May 2015 data to data from May 2015 and forward. Since Figure 1 provided in the rate case proceeding was based on pre-correction data that was more comparable between different years, the Department concludes that Figure 1 is more accurate from a comparison standpoint.

The Department agrees with Energy CENTS that logically, receipt of LIHEAP crisis funds and 24 reconnection rates should correlate. The Department also agrees that based on this observation, the 2014-2015 reconnection data looks “off.” However, given the two different mitigating factors at play—that the 2015 disconnection rate was abnormally low to being with, and that pre- and post-2015 data measured disconnections and reconnections differently—the Department does not think that one odd graph is enough evidence to warrant an external audit of the Company’s restoration data.

However, this proceeding also identifies just how significant this change in data reporting practices was. The Company appears simply to have decided to change this practice within the course of discovery, without Commission notice or approval. For our purposes here, pre-May 2015 data appears to be essentially meaningless.

3. Disconnection Data

ECC contends that the Company violated reporting statutes 216b.096 (subd. 1) and 216B.091 because it did not file in a timely manner. ECC further contends that the disconnection figures reported in the 2017 CWR Reports do not match those reported in MP’s instant SRSQ. As evidence, Energy CENTS cites filing information from eDockets and also an IR response. ECC recommends that the Commission require MP to suspend service disconnections until an investigation is completed and the Company can demonstrate that they are complying with statutory requirements and filing timely and accurate reports.

The Department confirmed that Energy CENTS’s account of reporting timelines is accurate. The Department also confirmed Energy CENTS’s 2017 data for all but the month of October. In initial comments, Energy CENTS reports that MP’s CWR Report shows 83 disconnections; however, the 83 figure only reflects MP’s report detailing activity for October 1-15, 2017. MP’s report for October 16-31 shows 112 disconnections.

¹⁵ See Attachment 1 to these Response Comments.

Minnesota Statutes require two reports to be submitted for the “bridge” CWR months of April and October. Typically, these reports capture two different sets of figures, and so the full number of disconnections for the month should be 83+112, or 195 customers. However, the Department confirmed with the Company via email that the October 16-31 CWR report counts *all* disconnections for the month of October, rather than those occurring in simply the second half of the month.¹⁶ Therefore, for the month of October 2017, the CWR report shows 112 disconnections total.

In Reply Comments, Minnesota Power acknowledged its lapse in reporting, and stated that it had to deal with staff turnover and miscommunication. In Reply Comments, the Company also stated that the CWR Reports and the SRSQ Reports used different data queries up through the end of 2017. In 2018, the Company implemented a redesigned SRSQ reporting query that matched the query used by the CWR reports. Thus, the CWR Reports submitted in 2017 will likely produce different results than the 2017 SRSQ report; since the November and December reports were not actually submitted until 2018, they were based on a query that matched the CWR query.

The Department notes that this explanation is consistent with the variation in the data when the entire year is considered, and is also consistent with the Company’s claim that it has standardized which dates it records for disconnection. The following table shows the percentage differences in each month from the CWR Reports and SRSQ, as well as the cumulative variation between the two for the entire year.

¹⁶ See Attachment 1 to these Response Comments.

Table 14. Number of Customers Disconnected Each Month of 2017 as Reported in MP's SRSQ versus CWR Monthly Reports

Month	Number of Customers Disconnected each Month, Reported in SRSQ	Number of Customers Disconnected each Month, Reported in CWR Monthly Reports	Percent Difference
January	94	75	-20.2%
February	86	61	-29.1%
March	167	138	-17.4%
April	244	306	25.4%
May	262	257	-1.9%
June	622	618	-0.6%
July	326	324	-0.6%
August	362	360	-0.6%
September	215	214	-0.5%
October	132	112	-15.2%
November	99	99	0.0%
December	59	59	0.0%
All Months	2,668	2,623	-1.7%

What this data indicates is that the Company reported approximately the same total number of disconnections between the two different reports, but the disconnections were reported in slightly different months. This information squares with the idea that the Company changed its reported disconnection date. It would also indicate that the -1.7% difference between the two reports would be due to the SRSQ query capturing disconnections that occurred in the Company's system in December 2016, but occurred in the field in January 2017.

Given that the differences in data can be explained, the Department does not believe an external audit or investigation of the Company's data is warranted. However, the Department is concerned that the Company again appeared to make changes in data practices without notifying the Commission or stakeholders in advance, or explaining why these types of differences may arise in the first place. Furthermore, the Company has clearly failed to meet statutory reporting requirements.

While suspending disconnections would not help address the issue and would likely result in larger problems in the future, the Department believes some sort of remedy is in order. The Department suggests that the Commission, in next year's SRSQ, again review the Company's

compliance with CWR reporting, as well as compare CWR and SRSQ data. If the Commission finds that the Company has not improved in the consistency of its data, an external audit may then be warranted.

4. Low Income Conservation

Energy CENTS contended that the Company is not doing enough conservation activities to help low income customers. As evidence, Energy CENTS pointed to the Company's 2017 reported number of audits and measures installed.¹⁷ However, ECC does not appear to issue a recommendation related to the alleged shortcomings of MP's performance. ECC also noted that the Company's low income CIP reporting is not transparent because the Company currently reports measures, rather than households, as program participants. Therefore, ECC recommended that the Commission require the Company to report low-income CIP participation by counting participants and measures separately. CUB and the Citizen's Federation agreed with ECC's recommendation.

In Reply Comments, MP specified that it does report customer participation in the Energy Analysis section of its annual CIP status report. However, the Company agrees that adding this figure to the Energy Partners section of the report would add transparency and reduce confusion, and so stated that the Company will report customer participation in both sections going forward.

While this issue appears to be resolved, the Department notes that the Commission may wish to require the Company to report low income program statistics as ECC recommended and MP agreed in future service quality filings, for ease of reference.

5. Reconnect Pilot

Energy CENTS opposed the Reconnect Pilot, and recommended that the Commission deny it, giving six reasons as to why the Pilot should be denied. LSAP, CUB, and the Citizen's Federation also shared in some of these concerns. The Department addresses each of these concerns below.

a. ECC argues that the pilot is at odds with in-person disconnection provisions

Both Energy CENTS and LSAP expressed concern regarding the Company's ability to comply with Minnesota Rule 7820.2500, which states, in part: "Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the

¹⁷ However, ECC did not provide any comparable data to render the information meaningful.

service is rendered and an attempt to make personal contact with the customer at the address.” MP’s response states in part:

Minnesota Power contends that this process follows Minn. Statute § 216B.098 Subd 3, as the customer has received a notice of disconnection (Attachment A), has been contacted by the Company via multiple methods to inform the customer they can make a payment plan to avoid disconnection, and has had the opportunity to contact the Company to enter into a payment plan. If agreement on a payment amount cannot be made between the Customer and the Company, the customer is referred to the MPUC. The MPUC will determine if a variance from service regulations for a single customer is appropriate. The Company will then reconnect a customer based upon the agreed to terms.

...

Minnesota Power has repeatedly stated that the pilot would not change its obligations under Minn. R., 7820.2500. Even though the pilot requires the use of remote disconnection technology as a part of the process and to be able to use remote reconnection, it does not preclude, nor is Minnesota Power proposing variance from, a personal visit by a representative capable of receiving payment in conjunction with the disconnection of service. It is fully Minnesota Power’s intention and obligation to follow the rules for disconnection. That said, Minn. R. 7820.2500 only references that the disconnection must happen in conjunction with a personal visit by a representative of the utility. It does not specify the technology used for disconnection. As such, it does not preclude the use of a remote disconnection switch, so long as the process is followed.¹⁸

That is, the Company states repeatedly that it would not violate Minnesota statute in this regard, and that the Reconnect Pilot would still require a personal visit in conjunction with a remote disconnection. The Department notes, however, that MP’s response does not exactly answer Energy CENTS’s question as to how or when MP would make the personal visit. It appears that the difference among parties may be the interpretation of Minnesota Rule 7820.2500 that “service may be disconnected only in conjunction with a personal visit.” The Department notes that since terms are not explicitly defined, it is not clear whether this means an in-person visit concurrent with disconnection, or otherwise. The Department therefore recommends that the Commission clarify Minnesota Rule 7820.2500.

¹⁸ MP Reply Comments, pages 8 and 13.

Presumably, there will be some type of internal procedure concerning staff decision-making and actions surrounding remote disconnection with a concurrent personal visit. The Department requests that Minnesota Power provide such a procedural manual that parties can review or otherwise identify how the Company will comply in providing a personal visit in conjunction with the disconnection.

b. ECC argues that the pilot will not help restore more customers in 24 hours

Energy CENTS states “[I]f the Company’s internal practices regarding payment agreements do not change, the pilot will not help to restore more customers within 24 hours of service disconnection.”¹⁹ MP does not explicitly address this claim in Reply Comments, but the Department does not agree with Energy CENTS’s statement. There are essentially four types of customers in question: those on a payment plan with remote reconnect, those on a payment plan without remote reconnect, those not a payment plan with remote reconnect, and those not on a payment plan without remote reconnect.

Even if the Commission decides that Minnesota Power may continue to require payment in full prior to reconnection during non-CWR months, customers who are not on a payment plan but have remote reconnect capabilities would still benefit from this program, as they will have faster reconnections that would cost them less than they would pay if the reconnection were conducted after hours.

However, if the Commission decides that Minnesota Power must offer payment plans to disconnected customers, then disconnected customers on a payment plan would also benefit from this program.

The Department notes that the goals of reconnecting customers quickly through technology and reconnecting customers quickly through payment arrangements are not mutually exclusive goals; both may be pursued in tandem. The Department therefore does not see why the technology component needs to be held up for the payment component, as some customers would still benefit from the technology component alone.

c. ECC argues that potential for discriminatory treatment exists

Energy CENTS argues that the Reconnect Pilot should be rejected because ...“the same potential for discriminatory treatment exists in the resubmitted pilot [as the pilot submitted in the rate case.”²⁰ Energy CENTS appears to define the potentially discriminated against target as “the lowest income, urban customers within the Company’s service territory,” but does not define what potentially discriminatory treatment this group might receive or why they would be

¹⁹ Energy CENTS Comments, page 15.

²⁰ Energy CENTS Comments, page 16.

treated in this manner. If anything, the Department notes that, were this not a pilot program that customers explicitly must qualify for, this group might even be considered to be receiving unreasonable *preference or advantage* in their ability to pay less and receive faster reconnection services. Unless Energy CENTS can better describe the discriminatory treatment that these customers may be subjected to, the Department is satisfied that potential discriminatory treatment is not a concern.

d. ECC argues that the Company does not provide a cost estimate for the pilot

This concern was raised by Energy CENTS and echoed by CUB and the Citizen's Federation. As discussed above, the Department also requested further cost information. However, it appears that ECC, CUB and the Citizen's Federation are requesting a slightly different type of cost study than what the Department requested. While the Department requested a marginal *customer* cost study of each of the four types of customers seeking reconnection,²¹ ECC appears to request something more akin to a marginal *program* cost study. ECC's specific concern seems to be as to where exactly the money for the program is coming from, as there is an additional cost to make meters remote-enabled, but the Company stated that there will be no "material" rate impacts. CUB and the Citizen's Federation appear to be requesting something more along the lines of a program cost/benefit study, as those groups indicate a need for an "estimation of net costs."

The Company did not respond to these concerns.

The costs of remote-enabled AMI for the pilot's target population may be outweighed by the costs of in-person reconnection during non-business hours and would reconnect customers more quickly. However, the Company seems to have only provided the one discussion of costs in response to the Department's concerns, and did not address the concerns of ECC, CUB, and the Citizen's Federation. The Department is not opposed to the Company being required to submit some type of cost study that would better address the concerns of ECC and the Consumer Advocates. However, as discussed in Part A.2.e. above, the Department recommends that the Commission deny the Company's proposed Reconnect Program, unless the Company submits an adequate cost study detailing the marginal cost of serving each type of customer circumstance identified in Table 3 above, and demonstrates how this program will result in a reduction of net reconnection costs captured in the Company's next rate case.

²¹ Remote reconnection during business hours, remote reconnection during non-business hours, non-remote reconnection during business hours, non-remote reconnection during non-business hours.

- e. ECC argues that the Company's justification for the pilot contradicts the rationale that they provided for their inability to restore more customers within 24 hours of service disconnection*

ECC points out that prior to reconnecting customers, the Company confirms that those customers are still residing at the disconnected location. The Company states that to confirm that customers are still in residence, it requires that the customer "be in contact with the Company,"²² and that to reconnect remotely, the customer will be walked through the process over the phone by a Company customer service representative. ECC "questions how a customer-initiated phone call, which could be placed from any location, confirms that a customer remains at the affected residence."

The Company does not respond to ECC on this count. However, the Department is not concerned about this possibility, as it seems extremely unlikely that a disconnected customer would be calling to reconnect a property for which they have made payment arrangements, but at which they no longer reside. Further, if such an instance does occur, a pilot program is precisely the avenue for recording and learning from it.

- f. ECC argues that the Company is using low-income people to experiment with new technology and to potentially save customer-service related costs*

The Department addressed this issue in its August 1, 2018 Comments, as a similar concern was brought up by Energy CENTS in the Company's 2016 Rate Case. The Company responded in Reply Comments, and the Department addressed the Company's Reply in Part A.2.b. above. The Department concluded that the Company appears to have acceptably avoided placing remote-capable meters with solely low income customers. However, due to the likelihood that this will change over time, the Department recommended that the Company submit in its annual SRSQ the percentage of remote-capable customers who receive LIHEAP.

- g. Department's Reconnect Conclusion*

Based on the Department's analysis in both the Rate Case and in Initial Comments, and taking into account the concerns of Energy CENTS and the Consumer Advocates, the Department concludes that the benefits of the Reconnect Pilot appear to outweigh any potential costs. However, the Department agrees with Energy CENTS and the Consumer Advocates that further cost analysis would be beneficial to the record. The Department further concludes that the Reconnect Pilot should be accompanied by annual reporting within the SRSQ. Further, MP should provide answer to the questions above and listed below as to compliance with the CWR law.

²² ECC July 30, 2018 Comments at Page 17.

III. RECOMMENDATIONS

Based on the Department's review and findings of the Company's disconnection and reconnection data and practices in these Response Comments, the Department concludes that a Commission investigation is not necessary at this time.

As to whether MP is currently in violation of the CWR law, the Department recommends that MP answer these questions regarding customer disconnects occurring in the same month in which a payment plan was executed:

1. How many of these disconnections occurred during CWR months? How many during non-CWR months?
2. Did MP offer a payment plan to every customer who was disconnected prior to their disconnection?
3. If not, why not?
4. If so, how many customers chose to enter into a payment plan? For any customers who did not have payment plans, does MP have information as to why the payment plans were not executed?
5. Did MP reconnect every customer after a payment plan was executed? If not, why not?
6. Did MP disconnect any customer who had entered into a payment plan in the same month *after* that the customer entered into a payment plan? If so, why?

As to the remaining aspects of the service quality report and Reconnect Pilot, the Department recommends that the Commission:

1. set 2018 goals at an average between 2017 goals and the 5-year rolling average;
2. direct the Company to offer payment plans to all disconnected customers during non-CWR months, unless that customer has a history of repeatedly breaking payment plans or repeatedly being disconnected for nonpayment, and incorporate this number into its annual SRSQ reports;
3. direct the Company to, in next year's SRSQ, review the Company's compliance with CWR reporting and compare CWR and SRSQ data;
4. deny the Company's proposed Reconnect Program, unless the Company submits:
 - a. a procedural manual for MP staff detailing how remote disconnection will coincide with personal visits in conjunction with disconnection; and

- b. an adequate cost study detailing the marginal cost of serving each type of customer circumstance identified in Table 3 above, and the impact that this will have on the Company's calculation of net reconnection costs in a future rate case;
5. clarify its interpretation of Minnesota Rules 7820.2500;
6. accept the agreement between Minnesota Power and Energy CENTS regarding CIP reporting and require MP to file the information in future service quality reports;
7. reject Energy CENTS's proposal to suspend all service disconnections pending a Commission investigation;
8. give greater weight to the Company's CARE proposal in Docket 11-409 as a way to prevent customer disconnections, and;
9. require the Company to file any final report or documentation from its work with the CAO in the relevant year's SRSQ Report.

Further, if the Commission chooses to approve the Company's Reconnect Pilot Program, the Commission should require the Company to report in its annual SRSQ:

- a. The number of customers on the program;
- b. The number of remote-capable customers who receive LIHEAP;
- c. The number of customers on the program who receive LIHEAP;
- d. The number of customers who have chosen to opt-out of the program; and
- e. The estimated savings cost of the program, both annual and lifetime.

/ja

From: Jenna Warmuth (MP)
To: [Winner, Danielle \(COMM\)](#)
Subject: RE: 18-250 questions
Date: Thursday, September 06, 2018 8:57:19 AM
Attachments: [image001.png](#)

Danielle,

Our responses to your clarifications are placed below in the highlighted text. If you have any further questions, please feel free to shoot me an email or give me a call. I know that all of these different iterations between MP and ECC can get a bit hard to trace.

1. The October 2017 disconnection data in the Service Quality filing reports 132 disconnections, and the CWR Reports show 83 ([first half of October](#)) and 112 ([second half of October](#)). It seems like usually the two October reports are added together, but here that would result in 195 disconnections. Do you know if the 112 counted the first 83 as well, so that there are 112 total, or is 195 the correct amount for the October CWR reports? **Yes, the 112 included the first 83 as well. We will look at better distinguishing these figures in future CWR reports.**
2. In response to Energy CENTS, MP says that the numbers in the Service Quality Reports are different from the CWR reports because of the Service Quality data query redesign. This makes sense to me- so, just to confirm my understanding, the redesign incorporated those three elements that MP talked about with regards to the change in the 2015 and 2016 data, correct? (using field disconnection date rather than system date, counting customers where one customer disconnected and another reconnected at same location, and counting customers where customer was disconnected and established a payment plan in the same month) **Yes, that is true.**
3. For the corrected 2015 and 2016 disconnection and 24-hour reconnection data- can you tell me how much each of those three elements impacted the data change? For example, was the increase in 24-hour reconnections largely due to using the field disconnection date, did each of those elements have an equal impact, did one of those elements not actually make a big difference in the corrections, etc? **We gather data of disconnections based the disconnection field activity. The largest element that impacted the disconnect numbers was counting customers where the customer was disconnected and established a payment plan in the same month. All other factors were fairly minimal for disconnects. The 24-hour reconnections are based on the timing between the reconnect and disconnect field activities, so the field disconnection and reconnect dates had the biggest impact.**
4. Was any pre-2015 data corrected? It's a little unclear looking at those LIHEAP Crisis Funds vs Reconnects in 24 hours graphs- some years the data looks different, and others it looks the same. **The data corrected was from May 2015 forward. All prior data came from another Customer Information System and has not been corrected. How the data was stored in our old Customer Information Systems varies from our new Customer Information System, so the corrections made to the data post-May 2015 would not be applicable to data pre-May 2015.**

Thank you,

Jenna Warmuth

Senior Public Policy Advisor

ALLETE PAC Administrator

Minnesota Power

Office: 218.355.3448

Cell: 218.969.5976

From: Winner, Danielle (COMM) [mailto:danielle.winner@state.mn.us]**Sent:** Tuesday, September 4, 2018 2:02 PM**To:** Jenna Warmuth (MP) <jwarmuth@mnpower.com>**Subject:** RE: 18-250 questions

[ALERT – External Email – Handle Accordingly]

Sounds good, thank you!

From: Jenna Warmuth (MP) <jwarmuth@mnpower.com>**Sent:** Tuesday, September 04, 2018 2:01 PM**To:** Winner, Danielle (COMM) <danielle.winner@state.mn.us>**Subject:** RE: 18-250 questions

Hi Danielle,

The person who works most closely with this data has been out on vacation but will return to the office tomorrow. We will get back to you as soon as possible. Thank you for your patience!

Jenna

From: Winner, Danielle (COMM) [mailto:danielle.winner@state.mn.us]**Sent:** Thursday, August 30, 2018 11:01 AM**To:** Jenna Warmuth (MP) <jwarmuth@mnpower.com>**Subject:** 18-250 questions

[ALERT – External Email – Handle Accordingly]

Hi Jenna-

I actually do have a few questions for you when you get a chance:

1. The October 2017 disconnection data in the Service Quality filing reports 132 disconnections, and the CWR Reports show 83 ([first half of October](#)) and 112 ([second half of October](#)). It seems like usually the two October reports are added together, but here that would result in 195 disconnections. Do you know if the 112 counted the first 83 as well, so

- that there are 112 total, or is 195 the correct amount for the October CWR reports?
2. In response to Energy CENTS, MP says that the numbers in the Service Quality Reports are different from the CWR reports because of the Service Quality data query redesign. This makes sense to me- so, just to confirm my understanding, the redesign incorporated those three elements that MP talked about with regards to the change in the 2015 and 2016 data, correct? (using field disconnection date rather than system date, counting customers where one customer disconnected and another reconnected at same location, and counting customers where customer was disconnected and established a payment plan in the same month)
 3. For the corrected 2015 and 2016 disconnection and 24-hour reconnection data- can you tell me how much each of those three elements impacted the data change? For example, was the increase in 24-hour reconnections largely due to using the field disconnection date, did each of those elements have an equal impact, did one of those elements not actually make a big difference in the corrections, etc?
 4. Was any pre-2015 data corrected? It's a little unclear looking at those LIHEAP Crisis Funds vs Reconnects in 24 hours graphs- some years the data looks different, and others it looks the same.

Let me know when you think you'll be able to get back to me on this- I'm hoping to incorporate your answers into my comments by mid-week next week, but I understand it may take longer on your end.

Hope you're doing well,

Danielle Winner

Public Utilities Rates Analyst

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Minnesota Department of Commerce

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CERTIFICATE OF SERVICE

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

Docket No. E015/M-18-250

Dated this **10th** day of **September 2018**

/s/Sharon Ferguson

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