



AN ALLETE COMPANY

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December 4, 2015

VIA ELECTRONIC FILING

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

Re: In the Matter of a Petition to Ensure Competitive Electric Rates for
Energy-Intensive Trade-Exposed Customers
Docket No. E015/M-15-984

Dear Mr. Wolf:

As noted in Minnesota Power's initial Petition dated November 13, 2015 in the above-referenced Docket, Minnesota Power has deposited \$10,000 into the account of the Arrowhead Economic Opportunity Agency, Inc. ("AEOA") as required under Minn. Stat. § 216B.1696, subd. 3. This subdivision of the section states: "upon the filing of a utility for approval of an EITE rate schedule under this section, the filing utility must deposit \$10,000 into an account devoted to funding a program approved by the commission under Minnesota Statutes, section 216B.16, subdivision 15. The funds shall be used to expand the outreach of the Commission approved affordability program." The cover letter accompanying the check describes Minnesota Power's approach to additional outreach by AEOA of Minnesota Power's Customer Affordability of Residential Electricity ("CARE") Program.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller".

David R. Moeller

DRM:sr
Attach.
Cc: Official Service List



minnesota power / 30 west superior street / duluth, minnesota 55802-2093 / 800-228-4966 / www.mnpower.com

Date: December 3, 2015

To: Arrowhead Economic Opportunity Agency, Inc.
Attn: Scott Zahorik, Housing Department Director

From: Micheline Bayiha, Rates

RE: Low-income funding from filing the Energy-Intensive Trade-Exposed (EITE) petition

Background:

Under Minn. Stat. §216B.1696, subd. 3, “Upon the filing of a utility for approval for an EITE rate schedule, the filing utility must deposit \$10,000 into an account devoted to funding a program approved by the commission under Minnesota Statutes, section 216B.16, subdivision 15. The funds shall be used to expand the outreach of the commission-approved affordability program.”

Minnesota Power filed for approval of an EITE rate schedule in a petition to the Minnesota Public Utilities Commission (“MPUC” or “Commission”) on November 13, 2015 in MPUC Docket No. E015/M-15-984. In compliance with this filing requirement, enclosed is a check from Minnesota Power (“Company” or “MP”) for \$10,000 to be deposited into the account of the Arrowhead Economic Opportunity Agency, Inc. (“AEOA”). AEOA administers the Company’s commission-approved Customer Affordability of Residential Electricity (“CARE”) Program. The purpose of the funds is to “expand the outreach” of the CARE Program.

CARE Program Outreach Expansion

Since the approval of the CARE Program on November 1, 2011, Minnesota Power has consistently had an average number of 10,500 Low-Income Home Energy Assistance Program (“LIHEAP”) customers every year. In contrast, the CARE Program has had an approximate annual average of 5,000 participants. This means that there are at least 5,000 participants who do not receive the Minnesota Power discounted CARE rate that is available to all LIHEAP-qualified customers.

Furthermore, a research firm MP hired prior to its 2009 rate case estimated, based on its analysis, that as many as 36,000 of Minnesota Power’s residential customers are potentially income-eligible for energy assistance. MP would like to use the EITE low-income outreach funds to expand its LIHEAP pool of customers, which in turn would help to engage more potential participants to the CARE Program.

Following is the proposed outreach effort with the goal of expanding the LIHEAP pool and achieving the enrollment of current identified LIHEAP-qualified customers in the CARE program by end of CARE program year 2017 (September 30, 2017).

Purpose and Activities

1. AEOA shall receive a \$10,000 check from Minnesota Power referred to as the “EITE Funds”.
2. AEOA shall identify opportunities for increased enrollment in each county of MP’s service territory, develop and implement a registration campaign effort for LIHEAP-qualified customers not currently enrolled in the CARE program.
3. In coordination with Community Action Agencies in MP’s service territory, and not limited to the following, examples of outreach for the CARE program could include:
 - a. Conduct a direct contact reach-out to LIHEAP-qualified customers not enrolled in the CARE program to enroll them or determine why they choose not to participate.
 - b. Distribute CARE program information to churches, church bulletins, senior dining sites, grocery stores, Citizens Coalition newsletter, food shelves, etc.
 - c. Market the CARE program in targeted areas, events and programs susceptible to host low-income eligible customers such as Head Start, Section 8 program, Women Infants Children Program, etc.
4. Engage in other activities designed to increase the current MP LIHEAP pool of customers and participation in the CARE program.

Documentation and Reporting

1. Maintain a separate account of EITE Funds and provide monthly reporting to Minnesota Power that includes:
 - a. Itemized monthly accounting expenses including direct and administrative charges
 - b. A list of activities performed, including results
2. This outreach effort will begin upon the receipt of the \$10,000 check by AEOA and shall end by September 30, 2017 unless specifically requested otherwise by either party, 30 days prior to the end of the outreach effort.
3. Provide an overall report at the end of the outreach effort.

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Susan Romans of the City of Duluth, County of St. Louis, State of Minnesota,
says that on the **4th day of December, 2015**, she served Minnesota Power's Supplemental
Filing in Docket No. E015/M-15-984 on the Minnesota Public Utilities Commission and
the Energy Resources Division of the Minnesota Department of Commerce via electronic
filing. The persons on the attached service list were served as requested.



Susan Romans

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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