

November 13, 2019

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: In the Matter of Commission Consideration of Minnesota Power's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2018

MPUC Docket No. E-015/M-18-250

Dear Mr. Wolf:

Enclosed please find the Energy CENTS Coalition's Comments in the above-captioned matter. An Affidavit of Service is also enclosed.

If you have any questions, please contact me at 651-774-9010.

Sincerely,

A handwritten signature in cursive script that reads "Pam Marshall".

Pam Marshall

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-21

Katie Sieben	Chair
Dan Lipschultz	Commissioner
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of Commission Consideration of
Minnesota Power's Compliance with Annual
Safety, Reliability, and Service Quality Metrics for 2018

**ENERGY CENTS COALITION
COMMENTS**

DOCKET NO. E015/M-18-250

November 13, 2019

The Energy CENTS Coalition (ECC) welcomes the opportunity to provide the following comments. Parties involved in this matter agreed that Winthrop & Weinstine, P.A. ("the Firm") was the appropriate third-party to conduct the assessment of Minnesota Power's ("MP" or "the Company") customer collection practices, service disconnection and reconnection procedures and compliance with relevant statutes, rules and reporting requirements.

ECC appreciates the extensive and detailed information included in the Firm's Compliance Assessment and, with one minor exception discussed further below, agrees with the conclusions of that report. The assessment found that MP's collection practices fully comply with Minnesota Statutes and Rules. The report also satisfies ECC's original concerns about the Company's reporting inaccuracies and failures to file timely, required service disconnection information. Given the changes the Company has made—dedicating staff positions responsible for ensuring accurate and timely reporting, establishing consistent data points and enhancing internal communication—ECC shares the Firm's confidence that the Company's future reporting will be accurate, consistent and filed in a timely manner.

The compliance assessment included a discussion about the Company's compliance with Minnesota Statutes Section 216B.-098, subdivision 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.

ECC believes that a clarification of our position regarding this statute, the Company's current collection practices and a mutual agreement about those practices, will resolve the legal issue that was raised in the report and will not require further Commission action. ECC does not dispute the fact that the Company can request payment in full of any past-due balance, as a condition of reconnecting service, from a currently disconnected customer. Rather, ECC's original concern involved the Company's practice of requiring full payment on a past-due bill *before* that customer was disconnected.

The report states the following about one aspect of MP's collection practices that does appear to violate the payment agreement statute: if a disconnection "is pending but disconnection has not yet occurred, meaning the customer is 81 or more days past due with a balance exceeding the threshold and has not already entered into a [payment agreement], MP requires payment in full." ECC discussed this concern with MP and the Company has agreed to offer payment agreements to all past-due customers, including those who are scheduled for disconnection but whose service has not yet been disconnected. With that clarification and because MP has agreed to change this particular collection practice, ECC does not dispute the Company's compliance with the payment agreement statute or any of the other relevant consumer protection statutes and rules.

ECC respectfully requests that the Commission accept the report, commend the effort of both the Firm and the Company for the thorough assessment of MP's collection practices and reporting procedures, and find that no further action is required.

Respectfully submitted,

November 13, 2019



Pam Marshall
Energy CENTS Coalition

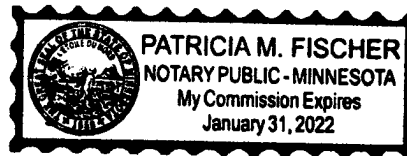
AFFIDAVIT OF SERVICE

Pam Marshall, being duly sworn, says that on the 13th day of November 2019, she served the individuals on the attached service list, by electronic filing, the Energy CENTS Coalition's Comments, In the Matter of Commission Consideration of Minnesota Power's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2018, MPUC Docket No. E-015/M-18-250.

Pam Marshall

Pam Marshall

Patricia Fischer



Patty Fischer

Subscribed and sworn to before me
this 13th day of November, 2019

Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-250_M-18-250
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-250_M-18-250
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-250_M-18-250
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-250_M-18-250
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_18-250_M-18-250
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-250_M-18-250
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_18-250_M-18-250
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-250_M-18-250

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-250_M-18-250
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-250_M-18-250

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	SPL_SL_18-250_M-18-250
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	SPL_SL_18-250_M-18-250
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	SPL_SL_18-250_M-18-250
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	SPL_SL_18-250_M-18-250
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	SPL_SL_18-250_M-18-250
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	SPL_SL_18-250_M-18-250
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	SPL_SL_18-250_M-18-250
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	SPL_SL_18-250_M-18-250
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200 St. Paul, MN 55101	Electronic Service	No	SPL_SL_18-250_M-18-250
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	SPL_SL_18-250_M-18-250

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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	SPL_SL_18-250_M-18-250