



April 16, 2025

VIA E-FILING

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

Re: In the Matter of Minnesota Power's Petition for Approval of a
Rider for Customer Affordability of Residential Electricity (CARE)
Docket No. E015/M-11-409
COMMENTS

Dear Mr. Seuffert:

On March 3, 2025, Minnesota Power (or the "Company") submitted its Thirteenth Annual Report for the Rider for Customer Affordability of Residential Electricity (or "CARE") discount program. The report was filed in compliance with Commission Orders issued in Docket Nos. E015/M-11-409 and E015/GR-09-1151, as well as pursuant to Minn. Stat. § 216B.16, subd. 15.

On March 20, 2025, the Public Utilities Commission filed a Notice of Comment Period with the following topic open for Comment for Minnesota Power only: CARE Program participants that use the self-declaration process to enroll must become approved for EAP before the May 1 grace period. Describe at what interval MP flags these accounts and describe the outreach efforts MP deploys to keep these customers on the CARE Program leading up to May 1.

Minnesota Power has a self-declaration process that complements the Low Income Home Energy Assistance Program ("LIHEAP" or "EAP") approval option for customers to qualify as income-eligible for the purposes of discount eligibility under the Company's residential rate design.¹ The self-declaration process uses categorical qualification (e.g., eligibility through other programs such as LIHEAP, Supplemental Nutrition Assistance Program; Minnesota Family Investment Program; Special Supplemental Nutrition Program for Women, Infants and Children; Temporary Assistance for Needy Families; Food Distribution Program on Indian Reservations; Supplemental Security Income;

¹ MPUC Docket No. E015/M-20-850, In the Matter of the Petition for Approval of Minnesota Power's Residential Rate Design, COMPLIANCE FILING (December 1, 2022).

MinnesotaCare) and/or a 60 percent of State Median Income ("SMI") threshold for the low-income self-declaration criteria. The objective is to provide a straightforward self-declaration process, leveraging other program eligibility processes, where possible, and using a simple check box type of form for customers to make their declarations. Those who are not eligible and approved for any of the programs listed for categorical qualification have the option to provide income data by way of check box income bands to qualify under the 60 percent of SMI criterion, which is above the income guideline of 50 percent of SMI used for the LIHEAP.

Self-declarations are recorded in the Company's billing system with an effective date at the time they are made. These are what is referred to as a characteristic on the customer's account or what could be called a flag on the account. If customers indicate they have a senior age 62 or older or someone who is living with a disability in their home, this is also added as a characteristic on the account for eligibility purposes under CARE.

A qualification exception applies under the CARE Program for customers who initially self-declare as income-eligible to receive a bill discount. This is in addition to the residential rate discount. All other CARE Program provisions apply. Participants enrolled in the CARE Program through the self-declaration process are flagged in the billing system with a CARE alert and their date of enrollment. Continued eligibility for the CARE Program, beyond the initial exception in the first year of self-declaration, is subject to customers requesting and being approved for EAP within one year of their low-income self-declaration. For consistency with other CARE Program provisions, the grace period of May 1st under CARE is followed, meaning customers have until the May 1st following their initial one-year self-declaration anniversary to receive EAP approval and stay in the program. By filtering accounts based on enrollment dates, the Company can identify which participants need EAP approval before the May 1 grace period deadline. If they are not EAP-approved by this deadline, they are removed from the CARE Program. An on-bill message is provided when customers are removed from CARE.

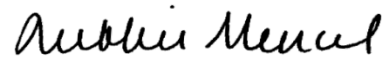
To encourage EAP enrollment, two communications were sent to these participants. The first letter, sent in October, informed them of the timeline for EAP approval. The second letter, sent in the following March, reminded those who were not yet approved that they had until May 1 to complete their EAP approval to avoid any disruption in their CARE Program participation. This proactive approach is intentionally planned around the EAP year and related communications. The objective is to ensure that all participants are advised of the required actions to continue to receive their program discount benefits without interruption.

Self-declarations can be made by customers at any time. New residential customers receive information about the self-declaration option shortly after they begin service with the Company. The cycle of communications follows from one year to the next for any

customers who have their first year of self-declaration and CARE participation under the exception provision.

If you have any questions, please contact me at (218) 355-3182 or dmencel@mnpower.com.

Yours truly,

A handwritten signature in black ink, appearing to read "Debbie Mencil". The script is fluid and cursive.

Debbie Mencil
Regulatory Compliance Specialist

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STATE OF MINNESOTA)
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COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

I, Tiana C. Heger of the City of Duluth, County of St. Louis, State of Minnesota, hereby certify that on the 16th day of April, 2025, I electronically filed a true and correct copy of Minnesota Power's Comments in **Docket No. E015/M-11-409** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on eDocket's Official Service List for this Docket were served as requested.



Tiana Heger