ENERGY
CENTS
COALITION

Commit Energy Now To Survive

July 30, 2018

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

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,

Pam Marshall

Pam Marshall

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

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report	**ENERGY CENTS COALITION COMMENTS**
DOCKET NO. E015/M-18-250	July 30, 2018

I. INTRODUCTION

The Energy CENTS Coalition (ECC) appreciates the opportunity to comment in the above-captioned matter. In these comments, ECC will address Minnesota Power's ("MP" or "the Company") disconnection and reconnection practices, statutory compliance regarding payment arrangements, Cold Weather Rule (CWR) reporting, LIHEAP outreach efforts and the proposed Reconnect Pilot. ECC does not believe that the Commission can rely upon the numbers that the Company reports and respectfully requests that the Commission open an investigation into the Company's disconnection and reconnection practices, including interviews with affected customers and an external audit of the Company's tracking and reporting practices.

II. SERVICE DISCONNECTIONS AND RECONNECTIONS

<u>Reconnections within 24 hours</u>

In the 2016 rate case,[1] the Company originally reported that only 11% of involuntarily disconnected customers in 2016 were reconnected to service within 24 hours. The Company subsequently reported that the "corrected" and "accurate" percentage for 24 hour reconnections in 2016 was 51.29%. In the rate case, MP initially reported that the percentage of customers restored within 24 hours in 2015 was 29.6% and, subsequently, "corrected" that figure to 73.37% (Schedule 1). ECC asked the Company to explain the significant discrepancy between the original and "corrected" numbers. In response, the Company stated that they "reviewed … [their] reporting process for disconnections and reconnections and revised the process for improved accuracy and uniformity. This resulted in some disconnection numbers being 'out of date' in past filings" (Schedule 1).

In this docket, ECC asked the Company to explain the factors that contributed to the increase in the percentage of customers reconnected within 24 hours from 24.5% in 2014 to 73.5% in 2015. ECC also asked the Company to explain the factors that contributed to the decrease in the percentage of customers reconnected within 24 hours from 73.5% in 2015 to 50.6% in 2016 to 48.1% in 2017. The Company's response was that they "cannot definitively point to why the percentage of customers reconnected within 24 hours would increase or decrease in a given year" (Schedule 2). In addition, the Company stated that

> when considering *payment options* for reconnection, account activity such as kept or broken payment plans, is considered. Further, there may be a combination of customer dollars and funds verified through an agency, *to bring an account current for reconnection*…the customer needs to keep their payment plan *or, as described under CWR (sic) keep 'reasonably timely payments'*…[Minnesota] Power offers the customer a pay plan, often in conjunction with agency funds, and considers this as 'payment in

[1] In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, Docket No. E015/GR-16-664.

> full'…The Company reconnects once funds are promised or obtained…Minnesota Power works with customers to identify *payment options that are attainable* while also working *to keep account balances as current as possible and out of collections*. (Schedule 3, emphasis added).

The Company's practices and responses indicate a potential violation of Minn. Stat. § 216B.098 (subd. 3) that 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* (emphasis added).

By definition, a disconnected customer has an arrearage balance. If the Commission determines that the statute requires that MP offer disconnected customers a payment agreement, the Company is clearly violating that statute. In the 2016 rate case, for example, the Company indicated "that customers who have been disconnected for non- payment are *required to pay the full balance on their account* plus a reconnection fee."[2] Even if the Commission doesn't make the determination that the statute requires the Company to offer payment plans to establish a reconnection of service, nothing in the payment agreement statute discusses payment "options" or reliance on agency funds or consideration of the status of past payment agreements or keeping account balances as current as possible. Further, the Company is wrong that the condition of "reasonably on time" applies only during the CWR period. For each instance in which the Company has demanded full payment from a past-due customer (disconnected from service or not), they are potentially violating this Minnesota Statute.

In 2015, the Department raised a concern about the decreasing number of MP customers restored within 24 hours and stated:

> the proportion of customers restored within 24 hours of being involuntarily disconnected declined in 2013 [35.4%] and even further in 2014 [24.5%].

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[2] *Id.*

> In years prior to 2013, the number of customers restored within 24 hours was approximately 50 percent. The Department requests that the Company provide discussion on what is, or may be, causing the decline in restoring involuntarily disconnected customers within 24 hours.[3]

In response to the Departments request, the Company said:

> that they cannot definitively pinpoint the cause for the increase of time restoring involuntarily disconnected customers. The increase may be due to an extended length of time needed for the customer to collect the necessary funds to establish reconnection… Once the customer *pays their balance in full* or an agency verifies funds for the account, Minnesota Power reconnects service (emphasis added).[4]

The Department, however, continued to question the decline in the number of customers restored within 24 hours, declaring:

> While the previous 2 years' significant drop in reconnections within 24 hours may be anomalous and not signify a trend, the Department remains concerned that MP's explanation focuses on potential causes outside its control. The Department requests that MP discuss in Supplemental Reply Comments the process that it used to try to identify the cause(s) for the sudden decrease in this performance metric. In addition, the Company should provide information to assure the Commission that the decline in restoration time is not due to any internal cause(s).[5]

The Company provided the following, supplemental response:

> Minnesota Power's internal business practices regarding the reconnection of a customer's service have remained unchanged for several years. Once the Company receives payment, the customer's service is generally reconnected the same business day and reconnection time does not exceed twenty-four hours from when payment is received. Consequently, the Company concludes that the 2014 decline in involuntary disconnect restoration time is likely not due to an internal matter.[6]

At the Commission meeting to discuss this matter, the following exchange took place:

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[3] Comments, MN Department of Commerce, Docket No. E015/M-15-323, July 31, 2015, p. 10.
[4] Minnesota Power Reply Comments, August 10, 2015, Docket 15-323, pp. 2-3.
[5] Response Comments, MN Department of Commerce, Docket No. E015/M-15-323, September 23, 2015, p. 2.
[6] *Id*., Supplemental Comments, MN Power, November 4, 2015, p. 2.

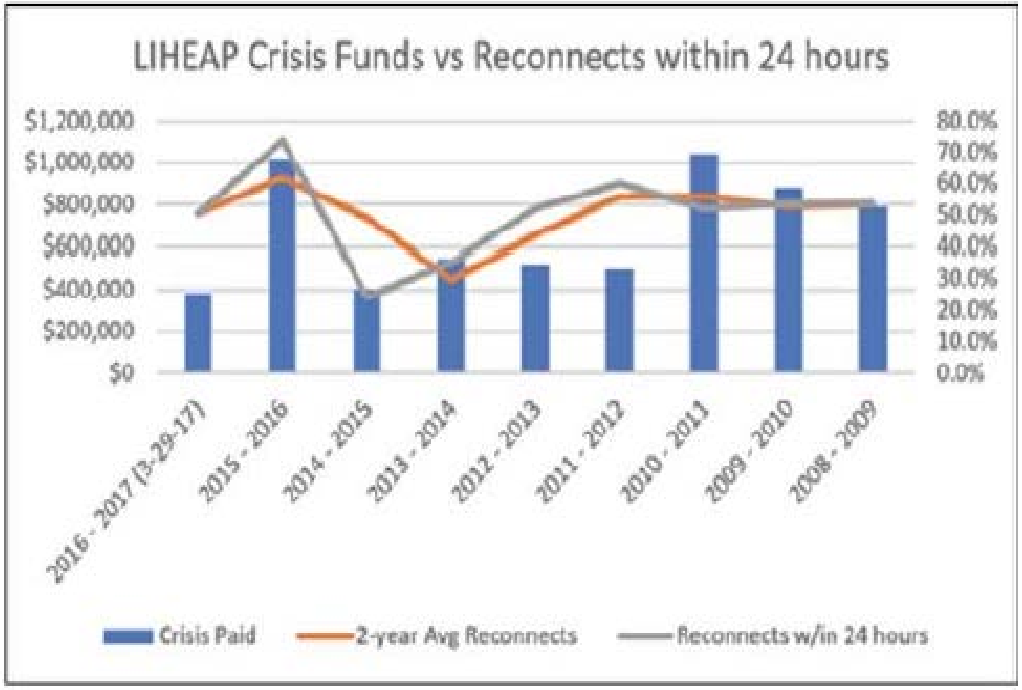
> Commissioner Lange: *The discussion from the Company with the Department was such that the Company basically looked at its processes and procedures and said we don't see how there could be anything internally…that's causing…fewer customers being reconnected within 24 hours. So, I'm just wondering what factors on the customer side would lead to a slower reconnection. If it's not on the Company side, what factors on the customer side inhibit reconnection?*
>
> MN Power (Jenna Warmuth): *I mean it would be speculation obviously but, we believe its most likely financial considerations…<u>it's just taking people more time to collect the funds they need to get the reconnection established</u>* (emphasis added).

It is clear that the Company requires full payment for past-due bills in order to restore service to disconnected customers. As discussed further below, the Company may be violating the statutory payment agreement requirement even as it applies to *connected* customers.

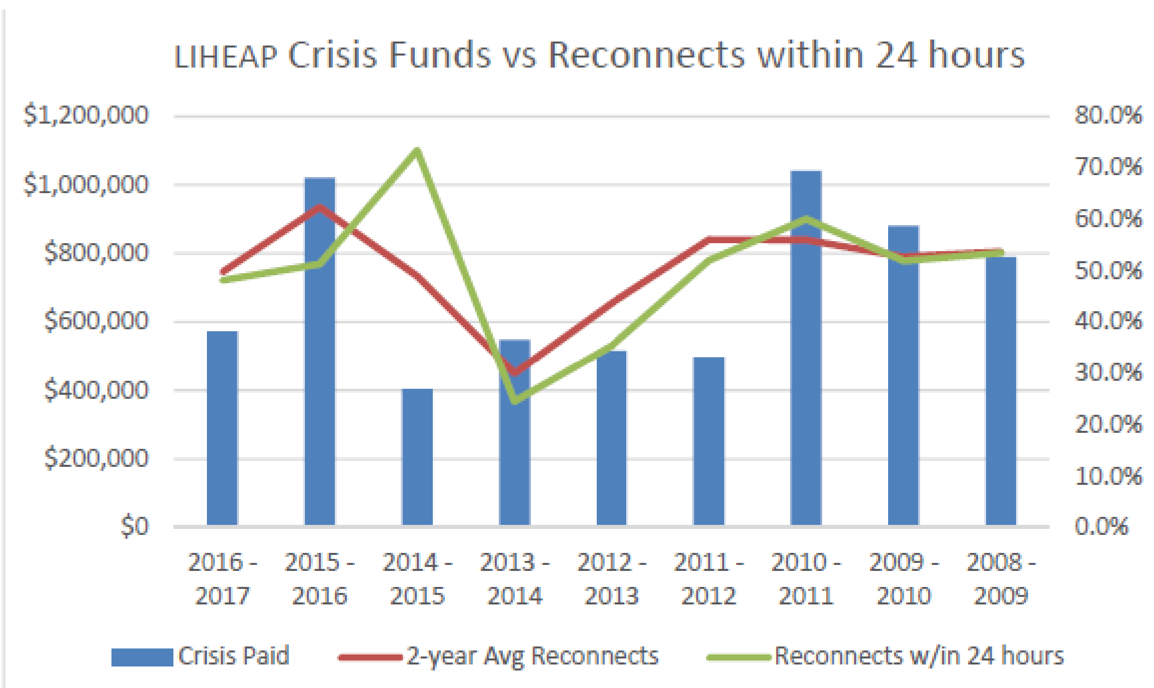
The answer to the Department's question regarding the decline in 24-hour service restorations in 2013 and 2014 is reflected in the graph below and in the Company's own statements about their reliance on agency funds. The graph shows that the level of LIHEAP crisis funds correlates to the number of customers restored to service. In 2015- 2016, the Company's customers received $1,020,663.42 million in LIHEAP crisis funds (funds provided to LIHEAP customers in addition to their primary grant to prevent service disconnection) and only $573,207.91 in 2016-2017.[7] Further, 57% of all service disconnections occurred in just four months when the LIHEAP program is closed (June 1-September 30) and no crisis grants are awarded. In fact, the Company states that "many factors could play into the difference in disconnected customers restored to service in the CWR and non-CWR months. Possible factors include…scarcity of available crisis funds" (Schedule 4).

Historically, the number of 24-hour service reconnections trends with the level of LIHEAP crisis funds received on behalf of MP's customers. In the 2016 rate case, the Company provided the graph below:

[7] MP response to ECC Information Request No. 6.



ECC asked the Company to update that graph to show the numbers and amounts for 2017. In response to this request, MP provided the following graph (Schedule 6):



ECC notes that the graphs are inconsistent for the years 2014-2015—the year that the Company initially stated that they restored 29.6% of disconnected customers within 24 hours and then "corrected" that number to 73.5%. The Company's correction, however, is suspect because 24-hour reconnections historically trend with the amount of LIHEAP crisis funds MP received and because 2014 was the year in which the Department found that 24-hour service reconnections declined most significantly. Further, the Company's "correction" took place two years after the initial number was reported.

ECC recommends that the Commission decline to rely on the Company's reported numbers and require an external audit of the disparate service restoration numbers provided by the Company. ECC also recommends that the Commission require the Company to provide a detailed explanation of what revisions they implemented for "improved accuracy and uniformity" of their service reconnection numbers and how such revisions resulted in the two incongruent graphs. Finally, the Commission should determine whether or not the Company is required to offer payment agreements to disconnected customers.

Payment agreements for past-due customers

It appears that the Company may also be violating the payment agreement statute to customers who are past-due but have not been disconnected from service. The Company acknowledges that "payment plans may be set to a schedule of weekly, bi-weekly or monthly and have varying term lengths…the average of the total payment plan due [not the scheduled payments] is $160.75"(Schedule 4). The Company should be required to provide the total amount of payment required ("scheduled") each month and, further, explain how bi-weekly payment terms consider the financial circumstances of their customers. The Commission's investigation should include a review of the Company's payment arrangement practices, particularly given the recent increase in the number of service disconnections.

<u>Customer service disconnections</u>

In 2016, 2,008 MP customers were disconnected from service. In 2017, that number increased to 2,668. MP states that they

> cannot definitively point to reasons for the increase…however, a contributing factor is a decrease in the balance threshold for severance from $200 to $100 that went into place in May 2017…this threshold…can lead to disconnection if efforts to bring the balance current…are unsuccessful…there is an important balance between avoiding disconnection and keeping customer balances…within ranges that are attainable by the customer and that satisfy amounts due for services rendered…this is in part the basis for Minn. Rules to explicitly define permissible service disconnection reasons (Schedule 5).

While the Company points to statutes governing disconnections in this response, they do not site Minnesota's payment agreement statute (§ 216B.098). That Statute does not reference payment "ranges that are attainable" or "that satisfy amounts due for services rendered," but, instead, requires the Company to consider a past-due customer's financial circumstances and any extenuating household circumstances. The graphs on page 6 above may explain the increase in service disconnections between 2015-2016 and 2016-2017—LIHEAP crisis funding was considerably higher in the 2015-2016 heating season.

<u>Cold weather service disconnections</u>

In Schedule 6, the Company discusses different methods for counting the number of disconnected customers including variations that could be caused "*where a disconnection occurred with a payment plan created under CWR in that same month*…during times when the CWR applies, a customer may be reconnected if they enter into a payment plan (emphasis added)." 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. The Commission should further investigate the Company's disconnection practices under the Cold Weather Rule, particularly as many as 32.5% of all MP residential service disconnections in 2017 occurred in the winter months (Schedule 7). This statement also highlights the fact that the Company only offers payment agreements to disconnected customers during the CWR rather than year-round as Minn. Stat. 216B.098 seems to require.

LIHEAP customer service disconnections

The number of MP customers receiving LIHEAP in 2017 was 9,966 or 8.4% of MP's residential customer class. Yet, in 2017, LIHEAP customers represented nearly 34% (33.9%) of all disconnected customers. Further, over 9% of all MP LIHEAP customers were involuntarily disconnected in 2017 (Schedule 7).

LIHEAP customers also represented 22% (3,853) of all residential customers (17,454) that received a disconnection notice in 2017 (Schedule 8). The average past due bill for customers who received a disconnection notice was $478.03, the average number of days past-due was 89 days, the average electric usage was 725 kWh/month and the range of electric usage was 0-12,146 kWh/month. Particularly since the amount and number of days past-due represent averages, the numbers suggest that the Company is not proactively offering payment agreements in a timely manner.

The Company also reports that 178 (4.6%) of the nearly 4,000 LIHEAP customers that received a disconnection notice in 2017 also received a Low Income Energy Partners audit. Given the staggering rate of electric consumption in the range discussed above, it is unclear why the Company would not perform more Energy Partners audits. Even if a LIHEAP customer did receive an audit, however, it is difficult to ascertain how many of them actually received any energy-savings installed measures. Further, even if they did receive installed measures, 12,030 of the 16,773 measures installed in 2017 involved only lighting. Only 124 of the 12,030 installed measures were refrigerators. The balance of the installed measures in 2017 included five programmable thermostats, water aerators, timers or showerheads, power strips or refrigerator thermometers.[8] This information contradicts the Company's assertion that they focus on the "most impactful energy savings measures and actions for helping the customer to save energy and lower their electric bills" (Schedule 8). Further, no electrically heated homes were assisted in 2017 through the Energy Partners program.[9] Finally, the Company complicates the ability for stakeholders to track low-income CIP participation because, unlike other Minnesota utilities, MP *defines the number of measures installed as participants* instead of defining participants as the number of customers assisted. ECC recommends that the Commission require the Company to report participation in the low-income Energy Partners Program by counting participants rather than measures and to report, separately, the type and number of measures installed.

All of this information should be understood within the context of the Company's low-income customer outreach efforts. ECC intends to discuss those efforts in greater detail in the Company's CARE docket. Generally, however, all the Company's efforts to identify LIHEAP-eligible customers are undermined by the Company's own practices—disproportionate numbers of LIHEAP customer service disconnections, inadequate CIP targeting (too heavily relying on federal Weatherization Assistance Program agencies rather than a focus on high-consumption electric customers), and failure to make a sufficient number of sustainable payment agreements. Additional outreach efforts to identify more LIHEAP-eligible customers are futile if the

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[8] In the Matter of Minnesota Power's 2017 Electric CIP Status Report, Docket No. E015/CIP-16-117.01, Minnesota Power's response to Fresh Energy Information Request No. 1.
[9] *Id*. Information Request No. 4.

Company continues to disconnect at least 9% of all of them or fails to make affordable payment arrangements with as many as 34% of them.

Cold weather rule and service disconnection reporting

Minn. Stat. § 216B.091 requires specific reporting measures and states:

> (a) Each public utility must report the following data on residential customers to the commission monthly, in a format determined by the commission:
>
> (1) number of customers;
>
> (2) number and total amount of accounts past due;
>
> (3) average customer past due amount;
>
> (4) total revenue received from the low-income home energy assistance program and other sources contributing to the bills of low-income persons;
>
> (5) average monthly bill;
>
> (6) total sales revenue;
>
> (7) total write-offs due to uncollectible bills;
>
> (8) number of disconnection notices mailed;
>
> (9) number of accounts disconnected for nonpayment;
>
> (10) number of accounts reconnected to service; and
>
> (11) number of accounts that remain disconnected, grouped by the duration of disconnection, as follows:
>
> (i) 1-30 days;
>
> (ii) 31-60 days; and
>
> (iii) more than 60 days.
>
> (b) Monthly reports for October through April must also include the following data:
>
> (1) number of cold weather protection requests;
>
> (2) number of payment arrangement requests received and granted;
>
> (3) number of right to appeal notices mailed to customers;
>
> (4) number of reconnect request appeals withdrawn;
>
> (5) number of occupied heat-affected accounts disconnected for 24 hours or more for electric and natural gas service separately;
>
> (6) number of occupied non-heat-affected accounts disconnected for 24 hours or more for electric and gas service separately;
>
> (7) number of customers granted cold weather rule protection;

(8) number of customers disconnected who did not request cold weather rule protection; and

(9) number of customers disconnected who requested cold weather rule protection.

(c) The data reported under paragraphs (a) and (b) is presumed to be accurate upon submission and must be made available through the commission's electronic filing system.

A monthly report must be filed with the commission no later than 45 days after the last day of the month for which data is reported (emphasis added).

In addition, Minn. Stat. § 216B.096, subd. 11 requires the following:

Annually on November 1, a utility must electronically file with the commission a report, in a format specified by the commission, specifying the number of utility heating service customers whose service is disconnected or remains disconnected for nonpayment as of October 1 and October 15. ***If customers remain disconnected on October 15, a utility must file a report each week between November 1 and the end of the cold weather period*** (emphasis added) specifying:

(1) the number of utility heating service customers that are or remain disconnected from service for nonpayment; and

(2) the number of utility heating service customers that are reconnected to service each week. The utility may discontinue weekly reporting if the number of utility heating service customers that are or remain disconnected reaches zero before the end of the cold weather period.

The data reported under this subdivision are presumed to be accurate upon submission and must be made available through the commission's electronic filing system.

As shown in Schedule 9, however, Minnesota Power filed reports on the following dates:

Monthly reports	Filing Date	Mos/Wks Non-compliant
January-June, 2017	**July 26, 2017**	**5 months**
April 2017	**November 21, 2017**	**7 months**
July-October, 2017	**November 21, 2017**	**3 months**

CWR weeks/months	Filing Date	
January 20-March 31, 2017	**April 3, 2017**	**ALL but one**
October 15-December 31, 2017	**March 28, 2018**	**ALL**

According to the Company, there was "turnover in the department responsible for reporting this information. The lapse in reporting on a monthly and weekly basis was due to a miscommunication between responsible parties" (Schedule 9). The significant delays in reporting lasted almost an entire year (April 3, 2017-March 28, 2018) straining the Company's explanation for the delay as a function of "turnover" and their characterization of such prolonged delays as "miscommunication." MP further stated that "going forward the Company *intends to* fully comply with Minn. Stat. § 216B.096, subd. 11 (emphasis added). The Company is silent about their non-compliance with Minn. Stat. § 216B.091. But, they have repeatedly violated both statutes.

It is also unclear why the numbers included in the Company's SRSQ report and the numbers filed under the reporting statutes differ, at times by as much as 20-25%:

2017 Service Disconnections	SRSQ	216B.096/.091 Reports[10]
January	94	75
February	86	61
March	167	138
April	244	306
May	262	257
June	622	618
July	326	324
August	362	360
September	215	214
October	132	83
November	99	99
December	59	59

In only two months in 2017 did the SRSQ reported number match the mandated report number and, in five months, there was a significant discrepancy between the two reported numbers. Most concerning, the two most significant variations between the two reported numbers occur in the CWR bridge months of April and October.

[10] Docket No. 17-02.

ECC recommends that the Commission require MP to suspend any 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.

III. RECONNECT PILOT

In the SRSQ report, the Company, "in accordance with the guidance provided by the Commission," proposed the Reconnect Pilot Program originally proposed in the 2016 rate case (SRSQ Report, p.34). But, the "guidance" the Commission provided in the rate case was to reject the Administrative Law Judge's finding that the Reconnect Pilot was just and reasonable. The Commission's Order stated:

> The Administrative Law Judge concluded that the Company's proposal is just and reasonable, dismissing the concerns of Energy CENTS. He reasoned that *remote disconnection of service is not an issue raised by the Company as part of its pilot* and is therefore not under consideration. He also reasoned that because reconnection is initiated via a phone call by the customer to the Company, there is no safety issue. He further reasoned that once customers who are disconnected "get their finances in order sufficient to resume electric service, the pilot benefits them directly by ensuring" reconnection at the same low price that applies during regular business hours. The Commission is not persuaded by the Administrative Law Judge's reasoning and will not adopt his recommendation. He insufficiently addressed the concerns of Energy CENTS, and as a result, his reasoning is not persuasive (emphasis added).[11]

In fact, just as in the rate case, the Company acknowledges that a "remote disconnection signal would have to have been sent to the meter" and it is unclear how such a signal complies with disconnection statutes that require a personal visit by an MP staff person who has the authority to accept a payment and avert the disconnection. There are several other reasons that the Commission should again reject the proposed Pilot.

[11] FINDINGS OF FACT, CONCLUSIONS, AND ORDER In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, DOCKET NO. E-015/GR-16-664, March 12, 2018, p. 81.

First, the Company claims that all Minnesota laws and rules regarding service disconnection “must be followed regardless of technology used” (SRSQ p. 37). Minn. Rule 7820.2500 states:

> Service may be disconnected only in conjunction with a personal visit by a representative of the utility to the address where the service is rendered and an attempt to make personal contact with the customer at the address. If the address is a building containing two or more dwelling units, the representative shall make a personal visit to the door of the customer's dwelling unit within the building. If security provisions in the building preclude free access on the part of the representative, the representative shall attempt to gain access to the building from the caretaker, for the purpose of attempting to make personal contact with the customer. The representative of the utility shall at all times be capable of receiving payment, if nonpayment is the cause of the disconnection of service, or the representative shall be able to certify that the cause of disconnection has been remedied by the customer.

In addition, Minn. Rule 7820.2900 states:

> The customer may apply to the utility to waive its right to disconnect. If the utility refuses to waive its right to disconnect, the customer may apply to the commission for emergency status. If the commission determines the customer has a probable claim in the dispute and that hardship may result in the event of disconnection of service, it may declare an emergency status to exist and order the utility to continue service for a period not to exceed 30 days.

Minn. Rule 7820.2400 requires a written disconnection notice and Minn. Stat. § 216B.097 requires the Company to inform cities of residential service disconnections. The Company does not indicate, when remotely disconnecting customers, *how* they will comply with these provisions.

Second, if the Company’s internal practices regarding payment agreements do not change, the pilot will not help to restore more customers within 24 hours of a service disconnection. In fact, in the 2016 rate case, the Company stated:

> It is difficult to say whether the Reconnect Pilot will increase the number of customers restored to service within 24 hours because while the remote reconnection capabilities will enable customers to be remotely and immediately

> reconnected once payment is received, it is still the customer's responsibility to make the appropriate payments to timely restore service.[12]

The Reconnect Pilot does nothing to address the more fundamental problems of the number and duration of service disconnections.

Third, the same potential for discriminatory treatment exists in the resubmitted pilot. In the rate case, the Company defined the target population, primarily customers in Cloquet and Duluth:

> [the Company] identified 216 customers that have "frequent disconnections," roughly 150 of which are included in the proposed pilot. For the purposes of this pilot, frequent disconnection refers to a customer that has four or more total disconnections. Of the 216 customers that meet the "frequent disconnections" criteria, 39 have been on the CARE rate and 138 are renters.[13]

The resubmitted Pilot targets the same customers—the lowest income, urban customers within the Company's service territory—those "with frequent disconnections (four or more over a five year period)…would be prioritized for the Pilot (SRSQ Report, p. 36)."

Fourth, the Company does not provide a cost estimate for the Pilot. Absent any substantiation, MP claims that "there are no material rate impacts" even though they acknowledge that adding remote reconnection capability will result in an "increased cost of 28% per meter" (SRSQ Report, p. 35).

Fifth, as discussed in the 2016 rate case, 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. When discussing restoration of service under their current practices, the Company stated "for safety reasons, the Company does not reconnect customers without *confirming they are still in residence, which requires the customer to be in contact*

[12] *Id, at* Exhibit 200, Schedule 24 (Marshall, Direct Testimony).
[13] *Id.* Schedule 25.

with the Company" (emphasis added).[14] When discussing the Pilot in this docket, however, the Company maintains that it is a safer way to reconnect customers and that "a customer service representative would initiate the reconnection and stay on the line with the customer to walk them through the process and affirm the reconnection" (SRSQ, p. 34). Beyond the contradictory safety claims, it is unclear how a company representative would contact a customer to initiate a remote service *disconnection* ECC also questions how a customer-initiated phone call, which could be placed from any location, confirms that a customer remains at the affected residence.

Sixth, ECC believes that the Company is using low-income people to experiment with new technology and to potentially save customer service-related costs. MP states:

> Of those meters with advanced metering infrastructure, not all have the remote reconnect capability. It would not be economical to automatically configure all installed AMI technology with this capability, as there is an increased cost of nearly 28 percent per meter…At this time…it makes sense to incur the incremental cost only where the communications infrastructure is in place…and where the level of disconnect/reconnect activity *warrants* the investment (emphasis added SRSQ, pp. 35-36).

Nothing about this Pilot is "warranted." The Company wants to initiate this pilot to provide "an example of how technology modernization can improve processes, increase safety, save time, and minimize expenditure of resources" (SRSQ, p. 36). Given that this Company cannot even accurately report the correct number of service disconnections and reconnections, the investment in this experiment may well be a dangerous one and one that almost certainly will undermine existing Minnesota utility consumer protections. The fact that the company wants to use this Pilot to "expand the availability to offer this capability to its customers [and] to ensure that systems and

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[14] *Id.*, Schedule 23.

processes are in place to scale this offering," is even more concerning. ECC recommends that the Commission reject this Pilot.

IV. CONCLUSION

ECC respectfully recommends that the Commission:

1) Require Minnesota Power to suspend all service disconnections pending an investigation including, but not limited to:
    a) The Company's compliance with all Minnesota Statutes and Rules regarding utility service disconnection during and outside of the CWR period, service reconnection and payment agreements, including identification of responsible employees;
    b) The Company's compliance with Minnesota Statutes and Rules regarding utility service disconnection reporting, including identification of responsible employees;
    c) An external audit to review the number of the Company's customers disconnected from service, restoration of service within 24 hours and restoration of service under payment agreements and interviews with affected customers, including those identified as the target population for the Reconnect Pilot;
    d) Information regarding payment agreements, including the amount and frequency of requested payments on customers' past-due balances;
    e) The Company's reliance on LIHEAP and LIHEAP crisis funds as a means for restoring customer service;
2) Reject the Company's proposed Remote Reconnection Pilot
3) Require the Company to report participation in the low-income Energy Partners Program by counting participants rather than measures.

Respectfully submitted, July 30, 2018

Pam Marshall

Pam Marshall

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018
Requesting By:	Pam Marshall Energy CENTS Coalition 823 E 7th Street, St. Paul, MN 55106 651-774-9010 pam@energycents.org		

REQUEST NO.	
7	In the Company's 2017 SRSQ Report for 2016, the Company originally reported that 11% of involuntarily disconnected customers were reconnected within 24 hours. In the Company's 2016 SRSQ Report for 2015, the Company originally reported that 29.6% of involuntarily disconnected customers were reconnected within 24 hours. In subsequent responses (ECC IR No. 12 in Docket 16-664), the company said they provided the following corrected numbers: 2016: 73.5% 2017: 50.6% A) Please clarify that the corrected information that the Company provided were for service years 2015 and 2016 and indicate if the following information is accurate: 2015: 73.5% 2016: 50.6% B) Please explain how such significant corrections (from 29.6% to 73.5% in 2015 and from 11% to 50.6% in 2016) were required. What were the original reported numbers based upon? What were the revised numbers based upon? Who was responsible for the originally reported numbers? Who was responsible for the corrected numbers? C) Please provide the raw data to show how both the original and revised numbers were derived.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

	D) What systems are in place to ensure (beyond using the actual disconnection date) that the numbers provided are accurate?

RESPONSE:

A. As outlined in the Company's 2018 SRSQ and ECC IR #3, the Company has reviewed its reporting process for disconnections and reconnections and revised the process for improved accuracy and uniformity. This resulted in some disconnection numbers being "out of date" in past filings. Using the guidelines provided in ECC IR #3, the accurate percentage of customers reconnected within 24 hours in 2015 and 2016 is as follows:

   2015 – 73.37%
   2016 – 51.29%

B. Please see Part A for explanation of reconfigured numbers. Due to privacy, the Company does not believe it is relevant or prudent to include employee identification for this request.

C. The Company has provided available data with each iteration of its corrections. (See past SRSQ Reports and ECC IR #12.01 Attach Supp in docket no. E015/GR-16-664 provided as Attachment A to this IR.)

D. Please see Part A to this IR.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

5/1/2017

2015 Involuntary Disconnection Report
Submitted for SRSQ April 1, 2016

	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.

2016 Involuntary Disconnection Report
Submitted for SRSQ April 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	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**

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018
Requesting By:	Pam Marshall Energy CENTS Coalition 823 E 7th Street, St. Paul, MN 55106 651-774-9010 pam@energycents.org		

REQUEST NO.	
8	Please provide the following information about customers restored within 24 hours (provided in Docket No. 16-664 to ECC IR No. 12) In 2013, the percentage of customers reconnected within 24 hours was 35.4% In 2014, the percentage of customers reconnected within 24 hours was 24.5% In 2015, the percentage of customers reconnected within 24 hours was (corrected number) 73.5% In 2016, the percentage of customers reconnected within 24 hours was (corrected number) 50.6% A) Explain what practices, procedures, LIHEAP funding levels or any other factors contributed to the increase in the percentage of customers reconnected within 24 hours from 24.5% in 2014 to 73.5% in 2015. B) Explain what practices, procedures, LIHEAP funding levels or any other factors contributed to the decrease in the percentage of customers reconnected within 24 hours from 73.5% in 2015 to 50.6% in 2016 to 48.1% in 2017.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

RESPONSE:

For both responses A & B, as outlined in the Company's 2018 SRSQ and ECC IR #3, the Company has reviewed its reporting process for disconnections and reconnections and revised the process for improved accuracy and uniformity. This resulted in some disconnection numbers being "out of date" in past filings. As provided in ECC IR #7, the accurate percentage of customer reconnected within 24 hours in 2015 and 2016 is as follows:

2015 – 73.37%
2016 – 51.29%

Minnesota Power cannot definitively point to why the percentage of customers reconnected within 24 hours would increase or decrease in a given year. The variables for disconnection, as described in ECC IR #10, Part D, outline some of the reasoning behind how and why a customer may be disconnected as well as the process for reconnection.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018

Requesting By: Pam Marshall
Energy CENTS Coalition
823 E 7th Street, St. Paul, MN 55106
651-774-9010
pam@energycents.org

REQUEST NO.	Ben,/Jenna
10	In Docket No. 15-323 Reply Comments, the Company stated: "that they cannot definitively pinpoint the cause for the increase of time restoring involuntarily disconnected customers. The increase may be due to an extended length of time needed for the customers to collect the necessary funds to establish reconnection … Once the customer *pays their balance in full or an agency verifies funds for the account*, Minnesota Power reconnects service (emphasis added)." In Supplemental Comments in Docket No. 15-323, the Company stated: "Minnesota Power's internal business practices regarding the reconnection of a customer's service have remained unchanged for several years. Once the Company *receives payment*, the customer's service is generally reconnected the same business day and reconnection time does not exceed twenty-four hours from when payment is received. Consequently, the Company concludes that the 2014 decline in voluntary disconnect restoration time is likely not due to an internal matter. A) Please clarify that the reference in the first quotation to paying their full balance means that a customers is not restored to service under a payment plan. B) Please clarify that the reference to payment received in the second quotation means that a customer is not restored to service under a payment plan.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

	C) Please indicate how many customers in each year from 2014-2017 were ***not*** restored to service, outside the Cold Weather Rule period, because they did not pay their full balance. D) Please explain how the Company's practice of requiring payment of the full past due balance complies with Minn. Stat. 216B.098 that states, in part, "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." E) How can an agency verify funds for customers during the months from May 1 – September 30 when LIHEAP agencies are closed?

RESPONSE:

A. Minnesota Power works with customers to determine a payment plan that is reflective of their circumstances, with the intent to bring the account current. When considering payment options for reconnection, account activity such as kept or broken payment plans, is considered. Further, there may be a combination of customer dollars and funds, as verified through an agency, to bring an account current for reconnection. Minnesota Power considers all of these factors when determining "payment in full." The Company does not definitively wait to verify funds have been collected before reconnection occurs, but may verify with an agency or request a confirmation code if paid online, particularly if prior payment plans have not been kept. The point being that the customer needs to keep their payment plan or, as described under CWR keep "reasonably timely payments". Power offers the customer a pay plan, often in conjunction with agency funds, and considers this as "payment in full" The Company does not wait to verify funds have been collected before reconnection occurs.

B. The highlighted statement is referring to the fact that the Company reconnects once funds are promised or obtained. The quote is not speaking to what the possible triggers are for reconnection.

C.

Year	Customers
2014	129

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448

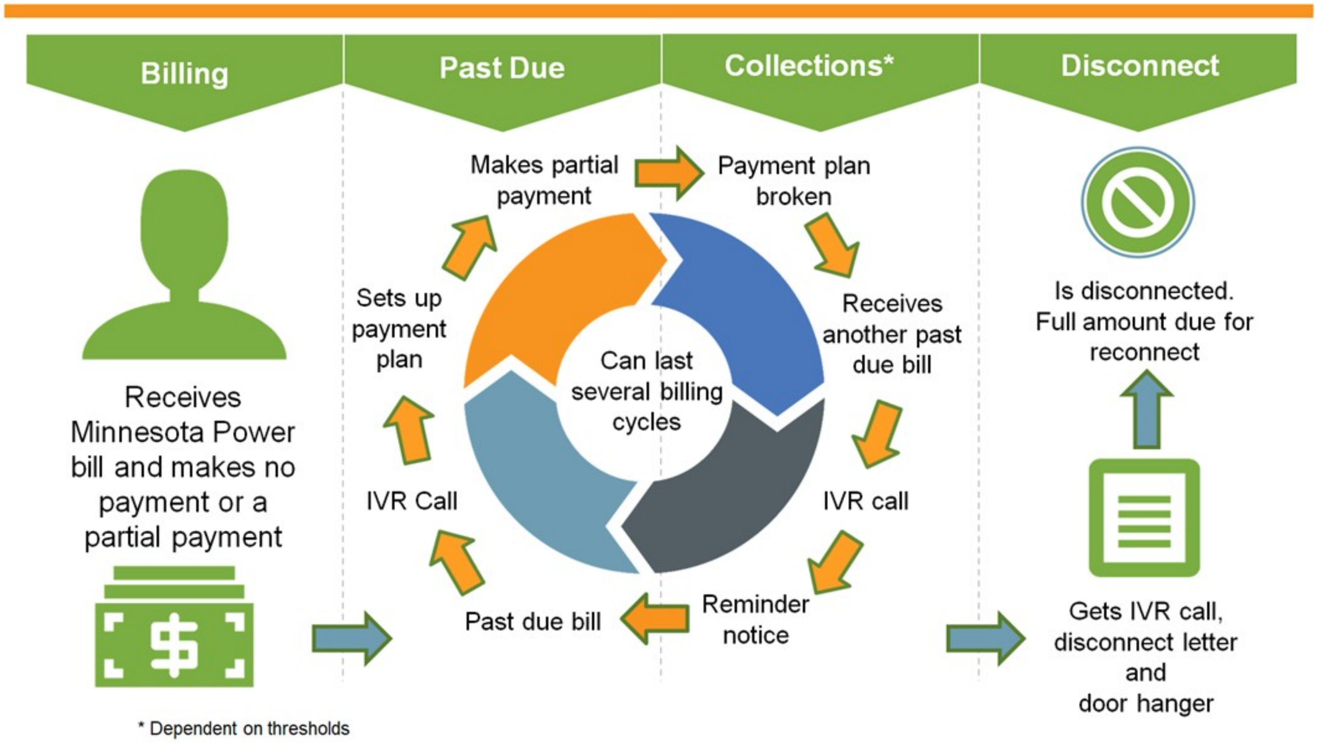
2015	14
2016	49
2017	109

For the years 2015-2017 this data represents the number of residential customers by year who were disconnected between 4/16 and 10/14 and never reconnected.

For the year 2014 this information was collected in a slightly different manner than other years as it is pre-conversion to the Company's current CIS. Some assumptions had to be made regarding the 129 unrestored customers. The Company looked for those customers who did not have a reconnect flag associated with their premise and were still disconnected during the specified timeframe.

D. Minnesota Power follows the disconnection rules and processes as outlined in Minn. Stat. §§ 216B.096, 216B.0976, and 216B.098, and Minn. R. 7820.1000 through 7820.1300 and 7820.2400 through 7820.3000. These procedures are described in the Electric Service Regulations of Minnesota Power, Minnesota Power Electric Rate Book, Section VI, most specifically on pages 3.4 and 3.17. Minnesota Power follows all rules and regulations, including notices and the option of a payment agreement, prior to disconnection. A high level depiction of the process is summarized in the figure below, beginning with the billing, followed by past due bill notices, the credit and collections process, and ultimately potential disconnection. This is not a strictly linear process. Rather, Minnesota Power works with customers to identify payment options that are attainable while also working to keep account balances as current as possible and out of collections. Please also refer to response A of this information request.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448



E. This question is best referred to the Department of Commerce. Minnesota Power has no influence on the processes of the agency; however, it is Minnesota Power's understanding that at least minimal staffing is maintained in some, if not all, of the agencies and they do not entirely close. In addition, there are several organizations that provide funds outside of the CWR designated months when LIHEAP funds are not available

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Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018

Requesting By: Pam Marshall
Energy CENTS Coalition
823 E 7th Street, St. Paul, MN 55106
651-774-9010
pam@energycents.org

REQUEST NO.	
12	Please refer to the following information provided by the Company in the 2017 SRSQ Report:

Month	Customers Disconnected Involuntarily	Customers Restored within 24 hours	Customers Restored by entering payment plan
January	94	47	57
February	86	49	58
March	167	92	97
April	244	107	122
May	262	119	150
June	622	272	376
July	326	143	201
August	362	177	235
September	215	123	168
October	132	64	96
November	99	58	78
December	59	33	42

A) Please explain why the percentage of disconnected customers restored to service within 24 hours is 50%-58.5% during the winter months and 43.7%-48.9% in the months May-August.

B) Please provide the duration of the service disconnection for customers whose service was restored by entering a payment agreement.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

	C) What was the average past due balance of the customers who were disconnected? D) What was the average past due balance of the customers restored within 24 hours? E) What was the average past due balance for customers restored under a payment plan? F) What was the average monthly payment required for customers who were restored under a payment plan. G) How many customers restored under a payment plan received LIHEAP?

RESPONSE:

A. Many factors could play into the difference in disconnected customers restored to service in the CWR and non-CWR months. Possible factors include but are not limited to: scarcity of available crisis funds and the CWR no longer available during summer months.

B. Customers reconnected by entering into a payment plan were disconnected between 0 and 235 days.
   - 86% of these customers were restored within 7 days.
   - 91% of these customers were restored within 14 days.
   - 95% of these customers were restored within 30 days.

C. The average past due balance of disconnected customers was $471.00.

D. The average past due balance of customer restored within 24 hours was $456.77.

E. The average past due balance for customers restored under a payment plan was $485.75.

F. Minnesota Power works with each customer and their unique situation to define a schedule that fits their needs. This means payment plans may be set to a schedule of weekly, bi-weekly or monthly and have varying term lengths. This variation in schedule and term makes responding to this request with an average monthly payment difficult without distorting the values. Therefore, the following are the average of the total payment plan due, not the scheduled payments. Also, this average monthly payment value excludes payment plans with only one scheduled payment, as that scheduled payment is a payment

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

in full. Average monthly payment required - $160.75.

G.

Month	Customers Restored by Entering a Pay Plan	LIHEAP Qualified
2017-01	57	28
2017-02	58	34
2017-03	97	41
2017-04	122	42
2017-05	150	38
2017-06	376	133
2017-07	201	69
2017-08	235	82
2017-09	168	65
2017-10	96	28
2017-11	78	29
2017-12	42	16

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018

Requesting By: Pam Marshall
Energy CENTS Coalition
823 E 7th Street, St. Paul, MN 55106
651-774-9010
pam@energycents.org

REQUEST NO.	
5	Please explain why the number of involuntarily disconnected customers increased from 2,008 in 2016 to 2,668 in 2017.

RESPONSE:

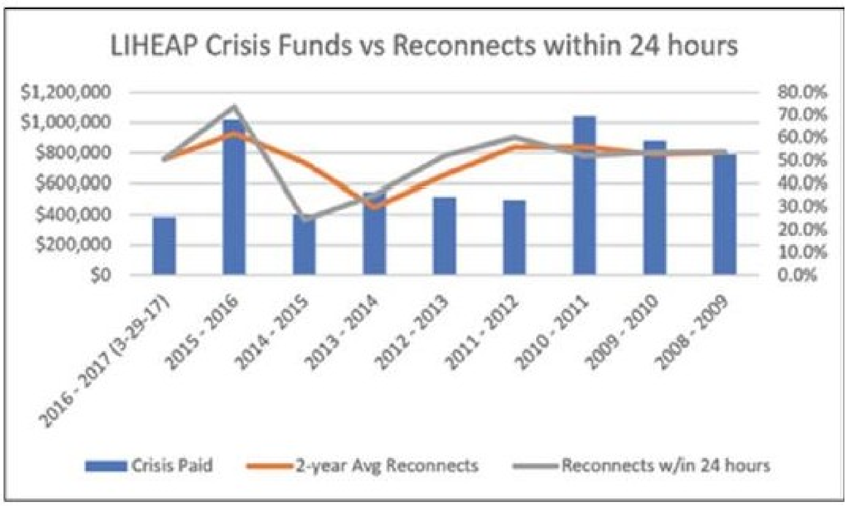
Minnesota Power cannot definitively point to reasons for the increase in disconnections from 2016 to 2017; however, a contributing factor is a decrease in the balance threshold for severance from $200 to $100 that went into place in May 2017. This threshold, combined with number of days past due, is used for initiating the severance process which can lead to disconnection if efforts to bring the balance current during the collections process are unsuccessful. Minnesota Power had increased the severance threshold during its customer information system conversion process and has been gradually adjusting back to the pre-system implementation level of $100. As stated in Appendix A of the SRSQ, there is an important balance between avoiding disconnection and keeping customer balances, including arrears, and related payment agreements, within ranges that are attainable by the customer and that satisfy amounts due for services rendered and received. This is in part the basis for Minn. Rules to explicitly define permissible service disconnection reasons.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018

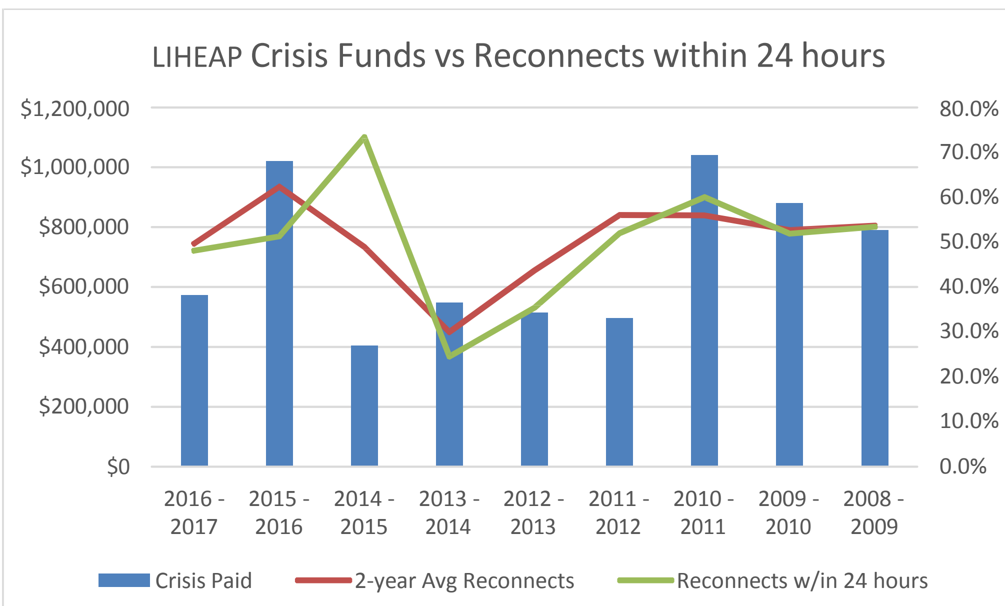
Requesting By: Pam Marshall
Energy CENTS Coalition
823 E 7th Street, St. Paul, MN 55106
651-774-9010
pam@energycents.org

REQUEST NO.	
3	Please update the table below for 2016 and to date in 2017 (provided in Docket No. 16-664) to ECC IR #12. 

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

RESPONSE:
As noted in the Company's 2018 SRSQ filing, in Appendix A, Pages 29-30, in light of some recent corrections to previously reported figures, Minnesota Power reviewed its reporting process for disconnections and reconnections and revised the process for improved accuracy. In the past, some reports used the date the disconnection was completed in the system to count disconnections, while others used the date the disconnection notice occurred in the field. In addition, there were situations when one customer was disconnected and another was started at the same location, and this type of customer could have been missed or the wrong customer could have been counted. Also, in months where a disconnection occurred with a payment plan created under CWR in that same month, disconnections were not included in previous counts. During times when the CWR applies, a customer may be reconnected if they enter into a payment plan.

For uniformity and accuracy in determining the number of disconnections, going forward the Company will use the date the disconnection was completed in the field when determining the customer affected. With this change, the number of disconnections that had been communicated before in any previous report/information request could be different than the numbers provided in the Company's April 1, 2018 Report. Consequently, the Company has revised the graph provided below to reflect the most accurate and current disconnection data.



Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018

Requesting By: Pam Marshall
Energy CENTS Coalition
823 E 7th Street, St. Paul, MN 55106
651-774-9010
pam@energycents.org

REQUEST NO.	
1	Of the 2,668 customers involuntarily disconnected in 2017, please provide the following information:

Total Customers Disconnected	Customer Disconnected and received LIHEAP	Total LIHEAP Customers	Month
94			January
86			February
167			March
244			April
262			May
622			June
326			July
362			August
215			September
132			October
99			November
59			December
Total: 2,668			

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

RESPONSE:

	Disconnections				Participation
Month	Residential (Non-LIHEAP)	LIHEAP	Total		LIHEAP
2017-01	56	38	94		8959
2017-02	43	43	86		9404
2017-03	114	53	167		9753
2017-04	159	85	244		9942
2017-05	169	93	262		9966
2017-06	418	204	622		9508
2017-07	208	118	326		9390
2017-08	235	127	362		9250
2017-09	140	75	215		9158
2017-10	103	29	132		6156
2017-11	76	23	99		7007
2017-12	42	17	59		7780
Total	1763	905	2,668		

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018
Requesting By:	Pam Marshall Energy CENTS Coalition 823 E 7th Street, St. Paul, MN 55106 651-774-9010 pam@energycents.org		

REQUEST NO.	Ben
14	A) What was the total number of MN Power residential customers in 2017? B) Of the 17,454 residential customer accounts that received service disconnection notices, please provide the following: 1. How many received LIHEAP? 2. How many were enrolled in CARE? 3. How many received an energy audit or services through Energy Partners? 4. What was the average number of days past-due? 5. What was the average amount past due? C) What was the average and range of electric usage for the 2,668 disconnected residential customers? D) How many of the 3,475 customers who received Cold Weather Rule (CWR) Protection were involuntarily disconnected? E) How many of the 3,475 customers who received CWR protection were exempt from any EITE charges?

Response by:	Jenna Warmuth
Title:	Senior Public Policy Advisor
Department:	Regulatory Affairs
Telephone:	218-355-3448

RESPONSE:

A) The total Residential Customer Accounts in 2017 was 118,956[1].

B) To clarify, 17,454 residential customer disconnection notices were sent. A single account could receive multiple notices in a given year.

1. 3,853 customers received LIHEAP.

2. There were 1,397 customers enrolled in CARE.

3. Minnesota Power's Conservation Improvement Program offers three home energy audit services for residential customers that include in-home visits to identify energy-saving opportunities. These audit services are: Standard Home Energy Analysis (free), Advanced Home Energy Analysis (fee for service), and Low Income Energy Partners Energy Analysis. A residential customer may participate in any of these three offerings, with the Low Income Energy Partners program specifically available to low-income customers. During in-home visits, customers are provided with energy-saving measures free of charge based on the specific applicability to the home. This can range from lighting products to advanced power strips for reducing plug load. The Low Income Energy Partners program is delivered in collaboration with community agencies. Agencies have the flexibility to focus on the most impactful energy-saving measures and actions for helping the customer to save energy and lower their electric bills. In addition to the direct installation measures referenced above, other energy-saving actions such as the replacement of a refrigerator or freezer, may also apply. Of the distinct accounts that received one or more disconnection notices in 2017, 178 received a Low Income Energy Partners audit, 56 received a Standard Home Energy Analysis audit and 3 received an Advanced Home Energy Analysis audit in 2017.

4. The average number of days past due was 89 days.

5. The average amount past due was $478.03. This average amount past due is based on the arrears of the customer on the date a disconnection notice was sent.

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[1] Distinct account count in every business date in the 2017 calendar year with at least one day with an active residential utility SA.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448

C) The average electric usage for the disconnected customers was 725 kWh/month
The range of electric usage for the disconnected residential customers was: 0 kWh to 12,146 kWh/month.

D) 730 customers were involuntarily disconnected after initially receiving CWR protection. This count includes each unique disconnection by month and account. If an account was disconnected in April and August, the two disconnections are included in the 730 customer count.

E) The Company has not implemented its EITE recovery rider to date.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: State Government Affairs
Telephone: 218-355-3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018
Requesting By:	Pam Marshall Energy CENTS Coalition 823 E 7th Street, St. Paul, MN 55106 651-774-9010 pam@energycents.org		

REQUEST NO.	Jenna
16	RE: CWR Reporting (Dockets 15-02, 16-02, 17-02, 18-02) A) In Docket 17-02, please explain why the required weekly CWR reports for January 20, 2017 through March 31, 2017 were all filed on April 3, 2017? B) In Docket 17-02, please explain why the required weekly CWR reports for the period April 15, 2017 through April 30, 2017 was filed in November 21, 2017. C) In Docket 17-02, please explain why the required weekly CWR reports for the period October 15, 2017 through December 2017 were all filed on March 28, 2018. D) In Docket 17-02, please explain why the required monthly reports for January-June were all filed on July 26, 2017? E) In Docket 17-02, please explain why the required monthly reports for July – October 2017 were all filed on November 21, 2017. Also, please explain why the reports for April 2017 were filed on November 21, 2017.

Response by:	Jenna Warmuth
Title:	Senior Public Policy Advisor
Department:	Regulatory Affairs
Telephone:	218-355-3448

RESPONSE:

In response to A-E, the Company experienced turnover in the department responsible for reporting this information. The lapse in reporting on a monthly and weekly basis was due to a miscommunication between responsible parties. Going forward the company intends to fully comply with Minn. Stat. § 216B.096, Subd. 11.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs
Telephone: 218-355-3448

AFFIDAVIT OF SERVICE

Pam Marshall, being duly sworn, says that on the 30th day of July 2018, she served the individuals on the attached service list, by electronic filing, the Energy CENTS Coalition's Comments In the Matter of Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report, MPUC Docket No. E-015/M-18-250.

Pam Marshall

____

Pam Marshall

Patricia Fischer

____

PATRICIA M. FISCHER
NOTARY PUBLIC - MINNESOTA
My Commission Expires
January 31, 2022

Patty Fischer

Subscribed and sworn to before me
this 30th day of July, 2018

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
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-250_M-18-250
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	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
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
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-250_M-18-250
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_18-250_M-18-250
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