

November 3, 2025

Sasha Bergman  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: First Supplemental Comments of the Minnesota Department of Commerce  
Docket No. E015/M-25-29

Dear Ms. Bergman:

Attached are the first supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

*Minnesota Power's 2024 Annual Safety, Reliability, and Service Quality Standards Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2025.*

The Report was filed by Minnesota Power (MP or the Company) on April 1, 2025. The Company filed Reply Comments on July 25, 2025 and first Supplemental Comments on August 25, 2025.

The Department:

- Recommends the Minnesota Public Utilities Commission (Commission) **accept** MP's 2024 Safety Report.
- Recommends the Commission **accept** MP's 2024 Service Quality Report
- Will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that MP will file later in 2025.
- Will confirm its recommendation for benchmarking MP's 2025 performance in its future supplemental filing responding to MP's report of IEEE's 2024 performance data.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

MK/ar

## Acronyms and Abbreviations

IEEE	Institute of Electric and Electronics Engineers
MP	Minnesota Power
OMS	Outage Management System
SRSQ	Safety, Reliability, and Service Quality
Department	Department of Commerce, Division of Energy Resources
EI	Edison Electric Institute
EIA	U.S. Energy Information Administration
PUC or Commission	Public Utilities Commission



## Before the Minnesota Public Utilities Commission

### Comments of the Minnesota Department of Commerce

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Docket No. E015/M-25-29

#### I. INTRODUCTION

On April 1, 2025, Minnesota Power (MP or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E015/M-25-29 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826.

The Department filed its initial comments on July 11, 2025 which included preliminary recommendations and a request for MP to provide additional information in a supplemental filing.

MP filed reply comments on July 25, 2025 and its first supplemental comments on August 25, 2025 addressing the additional reporting requested in the Department's initial comments. The Department had intended to respond to those comments at the same time as its response to MP's supplemental filing reporting IEEE benchmarking data; however, the IEEE data is not yet available, and Commission staff requested that we proceed with our response in other matters related to the SRSQ at this time.

#### II. PROCEDURAL BACKGROUND

April 1, 2025	MP filed its 2024 SRSQ Report.
April 30, 2025	The Commission issued a notice of comment period for the Report.
July 11, 2025	The Department filed its initial comments.
July 25, 2025	MP filed its reply comments.
July 28, 2025	The Commission issued a notice of comment period for supplemental comments. The Commission established a deadline of August 14, 2025 for supplemental comments reporting IEEE's 2024 performance year benchmarking data.
August 25, 2025	MP filed its first supplemental comments.

### III. DEPARTMENT ANALYSIS

#### A. INITIAL DEPARTMENT RECOMMENDATIONS

In the Department's initial comments on July 11, 2025, the Department provided initial recommendations which included a request for the Company to provide additional detail on two items in the Service Quality Report. The Department also recommended that the Commission require MP to include reliability performance data from both its old and new Outage Management System (OMS), if available in next year's report. MP provided the requested additional detail on its remote-reconnect costs and payment services error rate percentage in its reply comments<sup>1</sup> and first supplemental comments.<sup>2</sup>

The Department includes its analysis and discussion of this additional reporting detail below.

#### B. MP'S ADDITIONAL REPORTING DETAIL REQUESTED IN THE DEPARTMENT'S INITIAL COMMENTS

##### B.1. Remote-Reconnect Program Costs

The Department's initial comments noted that in last year's SRSQ report, MP had anticipated the 2024 remote-reconnect program costs to be \$185,000, but the actual 2024 program costs were \$67,000.<sup>3</sup>

In reply comments, MP explained that the original 2024 forecast was based on an assumption that 2,072 remote-capable meters would be installed in 2024 and 1,665 remote reconnections would occur.<sup>4</sup> In 2024, MP actually installed 1,452 remote-capable meters and performed 2,026 remote reconnections.<sup>5</sup> In addition to the reduced number of remote-capable meter installs in 2024 and increased number of reconnections from the earlier forecast, MP also noted that the labor/vehicle cost assumptions were also updated in 2024 largely due to contract wage increases, which impacted the 2024 costs.<sup>6</sup> The Company noted that it is currently on track to install the total target of 12,250 remote-capable meters before the end of the extended pilot period in July 2026.<sup>7</sup>

Based on the Department's review of MP's additional information regarding remote-reconnect program costs, the Department finds this information to be reasonable.

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<sup>1</sup> MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)).

<sup>2</sup> MP First Supplemental Comments, August 25, 2025 (eDockets [20258-222361-01](#)).

<sup>3</sup> Department Comments, July 11, 2025, (eDockets [20257-220862-01](#)) at 29.

<sup>4</sup> MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)) at 1.

<sup>5</sup> Id. at 2.

<sup>6</sup> Id. at 2; the cost assumption updates were reported by MP in its October 22, 2024 letter in the Reconnect Pilot Docket, Docket No. E015/M-19-766 (eDockets [202410-211208-01](#)).

<sup>7</sup> Id. at 2.

### *B.2. Payment Services Error Rate*

The Docket No. E015/M-21-230 Order dated December 2, 2021 required MP to provide percentage uptime and error rate percentage information on web-based services, including payment services, for three reporting cycles which is completed with the 2024 performance year's reporting.<sup>8</sup>

MP's initial report reported 100% uptime of its payment services site (Speedpay) in 2024, but did not include the payment services' error rate percentage data.<sup>9</sup> In its reply comments, MP noted that its payment vendor does not capture and store data on attempted and failed payments that occur during or due to payment system outages.<sup>10</sup> MP provided a supplemental filing which provided a summary of "failed payments" provided by Speedpay, showing an overall automated clearinghouse failure rate of 0.75%<sup>11</sup> MP states that the "failed payments" are actual payment attempts that are made through the application and then fail for some reason, such as bad card information, non-sufficient funds, expired cards, et cetera.<sup>12</sup>

The Department acknowledges that the Company has fulfilled the payment services error rate reporting through its subsequent filings.

### *B.3. OMS Data Availability for Future Reporting*

MP stated that the new OMS system went live on December 3, 2024 and the old system was decommissioned at that time,<sup>13</sup> so the Company will not be able to include data from the old system in next year's SRSQ report.

Given that the old OMS is no longer operational, the Department will no longer recommend requiring reliability performance reporting from both its old and new OMS next year. Since the new system went live in late 2024, 2025 will be the first full year reporting data from the new OMS. The Department anticipates that we may see more significant differences from historic reliability data in next year's report.

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<sup>8</sup> *In the Matter of Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2020 Annual Service Quality Reports*, PUC Order, December 2, 2021, Docket No. E015/M-21-230, (eDockets [202112-180350-01](#)) at order points 2 and 3.

<sup>9</sup> MP Report, April 1, 2025 (eDockets [20254-217120-01](#)) at 81-82.

<sup>10</sup> MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)) at 3.

<sup>11</sup> Calculated from the Overall % rate reported in MP First Supplemental Comments, August 25, 2025 (eDockets [20258-222361-01](#)), at PDF page 2.

<sup>12</sup> MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)) at 3.

<sup>13</sup> MP Reply Comments, July 25, 2025 (eDockets [20257-221442-01](#)) at 3.

#### *B.4. Department Recommendation*

The Department acknowledges that the Company has satisfied the additional reporting requested by the Department. The Department recommends striking its earlier request for the Commission to require MP to include reliability performance data from both its old and new OMS in next year's report, given that the old OMS has been decommissioned.

As noted in the Department's initial comments, the Department continues to recommend that the Commission:

- Accept MP's annual safety report.
- Require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.

Additionally, in these comments, the Department recommends that the Commission:

- Accept MP's annual service quality report.

#### *C. ANNUAL RELIABILITY REPORT*

The Commission's January 13, 2025 order in Docket No. E015/M-24-29,<sup>14</sup> requires MP to provide the IEEE 2024 performance year results via a supplemental filing in this docket. IEEE has not yet published utility size-based results at this time. The Department will file second supplemental filings including a recommendation on MP's annual reliability report after IEEE updates its results and MP submits its supplemental findings including these results.

In the Department's preliminary comments, it recommended setting the benchmarking of MP's 2025 performance to the five-year average of the IEEE benchmarks (2020 – 2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities data. The Department anticipates continuing to support this recommendation; however, the Department will provide an update on this recommendation after MP submits its supplemental filing reporting the IEEE 2024 performance year results.

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<sup>14</sup> *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, PUC Order, January 13, 2025, Docket No. E015/M-24-29 (eDockets: [20251-213880-01](#)) at Order points 2 and 3.

#### IV. DEPARTMENT RECOMMENDATIONS

From the Department's initial comments, the Department continues to recommend that the Commission:

- Accept MP's annual safety report.
- Require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.
- Benchmark MP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data.
  - If IEEE does not report utility-sized response results in the future, the Department recommends that the IEEE overall results for that year be used instead of relying on the utility-size results for the benchmark calculations.

Based on analysis of the Report and subsequent filings, the Department provides additional recommendations below. The recommendations correspond to the subheadings of Section III above.

*B. MP'S ADDITIONAL REPORTING DETAIL REQUESTED IN THE DEPARTMENT'S INITIAL COMMENTS*

- B.4. Accept MP's annual service quality report.

*C. ANNUAL RELIABILITY REPORT*

- C. The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future supplemental filing on the IEEE 2024 benchmarking data that MP will file after IEEE publishes the utility size-based results.
- C. The Department anticipates maintaining its recommendation to benchmark MP's 2025 performance to the five-year average of IEEE benchmarks (2020-2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data. However, the Department will provide an update on this recommendation after MP submits its supplemental filing reporting the IEEE 2024 performance year results.

## **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  
Supplemental Comments**

**Docket No. E015/M-25-29**

Dated this **3<sup>rd</sup>** day of **November 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	Official 25-29
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-29
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-29
4	MP Regulatory	Compliance	mpregulatorycompliance@mnpower.com	Minnesota Power		30 W Superior St. Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-29
6	Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
7	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-29
8	Analeisha	Vang	avang@mnpower.com			30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	Official 25-29
9	Claire	Vatalaro	cvatalaro@allete.com	Allete		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	Official 25-29
10	Sarah	Whiting	swhiting@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	Official 25-29