

February 12, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-21-61

Dear Mr. Seuffert,

On January 25, 2021 the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment Period* seeking comments on Minnesota Power's (MP or the Company) Compliance Report on Rate Design for Large Power Customers. Attached please find the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department).

The Department recommends **acceptance** of Minnesota Power's compliance report, and is available to answer any questions the Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst Coordinator

SLP/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E015/M-21-61

I. BACKGROUND INFORMATION

On June 30, 2020, the Minnesota Public Utilities Commission issued its Initial Order Approving Petition and Resolving Rate Case with Conditions in Minnesota Power's (MP or the Company) 2019 Rate Case.¹ In its Order, the Commission directed MP to work with its Large Power customers (LPI) to discuss rate design alternatives and to report on the those discussions within six months.

On December 22, MP filed its compliance report on its discussions with its LPI customers.

II. DEPARTMENT ANALYSIS

The Department has reviewed MP's compliance filing, and concludes that it complies with the directives set forth by the Commission in its June 30th Order.

MP's report details its outreach to its LPI customers. The Company met with its LPI customers individually to solicit feedback on their particular needs. MP states that LPI customers operate in industries subject to competitive commodity markets, and as such are uniform in their concerns with costs, including cost of electricity.

MP indicated LPI customers expressed some interest in additional opportunities for access to market priced electricity, and to additional demand response offerings. The 24/7 nature of the LPI operations does not lend itself well to TOU pricing structures, although some customers indicated some level of dynamic pricing may be workable.

The Department has reviewed MP's compliance report, and concludes that it complies with the Commission's June 30th Order. In its filing, MP stated it would be filing a petition for approval of additional demand response product offerings in the near future.² Given the proposed demand response filing, and that MP has stated it intends to file a general rate case later in 2021, the

¹ *In the Matter of the Application of Minnesota Power for Authority to Increase Electric Service Rates in Minnesota*, Order Resolving Rate Case with Conditions, Docket No. E015/GR-19-442

² The Company subsequently filed a proposal in Docket No. E015/M-21-28.

Department does not recommend any further action be taken as MP will have the opportunity to address LP customer feedback with proposed revisions or new offerings at the time of its rate case.

III. DEPARTMENT RECOMMENDATION

The Department recommends the Commission accept Minnesota Power's compliance filing.

/ja

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
Comments**

Docket No. E015/M-21-61

Dated this 12th day of February 2021

/s/Sharon Ferguson

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