COMMERCE DEPARTMENT

June 16, 2023

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-23-75

Dear Mr. Seuffert,

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

> Minnesota Power's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2022.

The Department:

- Recommends the Commission **accept** Minnesota Power's Annual Safety Report.

- Requests MP provide the following in reply comments:
  - Further information explaining the Days of Job Transfer or Restriction for 2022 being approximately 15 percent above the ten-year average.
  - Information regarding what safety awareness campaigns and/or trainings it has or intends to implement to mitigate incidents of vehicle damage.
  - Monthly data on its call center response time goals through the first half of 2023 supporting its claim of continuing improvement
  - Its plan to drive more traffic to Facebook and Instagram, or the threshold of participation at which it will no longer pursue these platforms.

- Will make final recommendations on the Company's Annual Service Quality Report after reviewing its reply comments.

- Will provide a recommendation on the Company's Annual Service Reliability Report after reviewing the Company's future supplemental filing on Institute of Electrical and Electronics Engineers benchmarking data for 2022.

The Department is available to answer any Commission questions.

Sincerely,

/s/ CHRIS WATKINS
Public Utilities Rates Analyst

CW/ja
Attachment

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E015/M-23-75

I. BACKGROUND

Minnesota Rules 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission (Commission) to establish safety, reliability, and service quality (SRSQ) standards for "utilities engaged in the retail distribution of electric service to the public" and to monitor performance as measured against those standards. The rules set forth three main annual reporting requirements:

(1) the annual safety report (Minnesota Rules, part 7826.0400),

(2) the annual reliability report (Minnesota Rules, parts 7826.0500, subp. 1 and 7826.0600, subp. 1), and

(3) the annual service quality report (Minnesota Rules, part 7826.1300).

In addition to the rule requirements, the Commission has issued six recent Orders that include additional reporting requirements. The Department lists these Orders chronologically below.

The Commission's January 28, 2020, Order in Docket No. E015/M-19-254 required Minnesota Power (MP or the Company) to include the following in its next and subsequent annual filings:

a. Non-normalized SAIDI, SAIFI, and CAIDI[1] values;
b. SAIDI, SAIFI, and CAIDI values calculated using the IEEE [Institute of Electrical and Electronics Engineers] 2.5 beta method;
c. MAIFI [Momentary Average Interruption Frequency Index], normalized and non-normalized;
d. CEMI [Customers Experiencing Multiple Interruptions] – at normalized and non-normalized outage levels of 4, 5, and 6;
e. The highest number of interruptions experienced by any one customer;
f. CELI [Customers Experiencing Lengthy Interruptions] – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours;

[1] SAIDI = System Average Interruption Duration Index, SAIFI = System Average Interruption Frequency Index, CAIDI = Customer Average Interruption Duration Index.

g. The longest experienced interruption by any one customer (or feeder);
h. A breakdown of field versus office staff required;
i. Estimated restoration times;
j. IEEE benchmarking;
k. Performance by customer class; and
l. More discussion of leading causes of outages and mitigation strategies.

On December 9, 2020, the Commission issued its *Order Approving Pilot Program* in Docket No. E015/M-19-766. MP committed to providing the following data in its annual SRSQ Reports that proceeding:

a. Number of customers participating in the remote-connect program;
b. Total number of MP customers receiving lower-income home energy assistance;
c. Number of remote-connect participants receiving low-income home energy assistance;
d. Number of customers who have opted out of the remote-connect program;
e. Estimated annual cost savings from the remote-connect program;
f. Average time to reconnect using the remote-reconnect program compared to the standard reconnection process; and
g. Number of reconnections restored within 24 hours of disconnection, distinguishing between standard and remote reconnections.

The Commission's December 18, 2020, Order in Docket No. E015/M-20-404 required the Company to propose a transition to the full benchmarking approach to setting reliability standards, including a discussion of the definition of work centers, benchmarking for individual work centers, and other considerations. The Commission also required the Company to report information on the number of website visits, logins to electronic customer communication platforms, emails from customers, and types of emails from customers. The Commission set service territory-wide reliability standards based for Minnesota Power based on the IEEE benchmarking second quartile for medium utilities.

In its December 2, 2021, Order in Docket No. E015/M-21-230 the Commission required the Company to provide additional information regarding:

1) Electronic utility-customer interaction beginning with the reports filed in April 2023;
2) Percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based services.
3) To continue to provide information on electronic utility-customer interaction such that baseline data are collected:
    a) Yearly total number of website visits;

b) Yearly total number of logins via electronic customer communication platforms;
c) Yearly total number of emails or other customer service electronic communications received; and
d) Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700.

4) Public facing summaries with their annual Safety, Reliability, and Service Quality reports.

On March 2, 2022, the Commission issued its *Order Accepting Reports and Setting 2021 Reliability Standards* in Docket No. E015/M-21-230, establishing three work centers for Minnesota Power's service territory, setting statewide reliability standards at the IEEE benchmark for the second quartile of medium utilities, and setting MP's reliability standards for its work centers at the IEEE benchmark for the second quartile of small utilities.

Lastly, in its January 18, 2023 Order in Docket No. E015/M-22-163 the Commission eliminated the standalone Annual Summary of Customer Complaints docket (YY-13) and required the Company to include customer complaint data from Minnesota Rules 7820.0500 in its Annual Service Quality reports with data filed as a part of Minnesota Rules 7826.2000.[2]

On April 3, 2023, MP filed its *2022 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI an CAIDI Reliability Standards for 2023* (2022 SRSQ Report or Annual Report) in Docket No. E015/M-23-75 to comply with the Commission's recent Orders referenced above and the requirements of Minnesota Rules Chapter 7826.

On April 26, 2023, the Commission filed a *Notice of Comment Period* requesting that parties respond to the following questions:

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2022 Safety, Reliability, and Service Quality Metrics reports?

2. Are the utilities' reports consistent with recent Orders and Minn. Rules Ch. 7826 on Electric Utility Standards?

3. At what level should the Commission set the utilities' 2023 Reliability Standards?

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[2] *In the Matter of Minnesota Power's 2021 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2022.* ORDER. Docket No. E015/M-22-163. January 18, 2023. Order Points 1 and 2. Accessed at: https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={C055C585-0000-CB28-B48C-0C100F954DD7}&documentTitle=20231-192232-03

4. What additional solutions might utilities pursue to improve call center response time?

5. Are there other issues or concerns related to this matter?

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed MP's Annual Report to assess compliance with Minnesota Rules, Chapter 7826, and the Commission's various Orders. The Department used information from past annual reports to facilitate identification of issues and trends regarding MP's performance.

The Department provides:

- responses to the Commission's questions;
- a summary of our review of MP's 2022 Safety, Reliability and Service Quality Reports;
- a discussion of the Company's reliability standards for 2023; and
- a discussion of the Company's compliance with other Commission Orders.

A. RESPONSE TO COMMISSION QUESTIONS

a. Should the Commission Accept MP's Safety, Reliability and Service Quality Metrics Reports?

The Department recommends that the Commission accept Minnesota Power's Annual Safety report. The Department is awaiting additional information regarding the Service Quality and Reliability portions of the Company's 2022 filing before making a recommendation regarding those aspects of the filing. MP will be supplementing its petition sometime in the fall of 2023. That supplement will include reliability goals for 2022 as developed using the IEEE benchmarking methodology. The Department plans to file supplemental comments regarding its review of that information soon after MP files that information.

b. Is Minnesota Power's 2022 Annual Report consistent with recent Orders and Minn. Rules Ch. 7826 on Electric Utility Standards?

Yes, the Department's review concludes the Company's report is consistent with the requirements listed in the Commission's question.

c. At what level should the Commission set Minnesota Power's 2023 Reliability Standards?

The Department recommends the Commission continue the current process of using the IEEE Distribution Reliability Group's annual benchmarks for Minnesota Power's 2023 Reliability Standards.

d. What additional solutions might utilities pursue to improve call center response time?

The Department has no specific recommendations to Minnesota Power to improve call center response times at this stage, has requested further clarifying information from the Company in reply comments, and will provide final recommendations after viewing MP's response.

e. Are there other issues or concerns related to this matter?

The Department does not have any additional concerns currently.

B. ANNUAL SAFETY REPORT

1. Summary of Minnesota Safety Standards

Minnesota Rules 7826.0400 requires the utility to file an annual safety report consisting of two parts:

A. A summary of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and

B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of any injuries or property damage described.

The following tables are a compilation of OTP's summaries of the reports the Company filed with OSHA and OSHD for the previous 10 years.

Table 1: Types and Numbers of Reports Filed with OSHA and OSHD (2013 -2022)

	Number of Deaths	Number of Cases with Days Away from Work	Number of Cases with Job Transfer or Restriction	Other Recordable Cases
2013	0	4	3	17
2014	0	3	8	10
2015	0	5	4	8
2016	0	8	5	15
2017	0	10	6	15
2018	0	1	3	14
2019	0	3	4	12
2020	0	5	11	13
2021	1	6	1	10

2022	0	5	9	10
Average	0.1	5	5.4	12.4
Variance	-0.1	0	3.6	-2.4

The above results suggest that there was not a significant increase or decrease in the metrics included in Table 1 for Minnesota Power in 2022.

Table 2: Number of Day of Restricted or Other Service in Reports filed with OSHA and OSHD (2013 -2022)

	Days of Job Transfer or Restriction	Days Away from Work
2013	218	29
2014	267	26
2015	115	26
2016	171	107
2017	629	139
2018	87	2
2019	319	95
2020	762	102
2021	259	287
2022	369	51
Average	319.6	86.4
Variance	49.4	-35.4

The Department notes the improvement in days away from work compared to the ten-year average, and requests further information from the Company explaining the Days of Job Transfer or Restriction for 2022 being approximately 15 percent above the ten-year average.

Table 3: Injury & Illness Types in Reports filed with OSHA and OSHD (2013 - 2022)

	Injuries	Skin Disorders	Respiratory Conditions	Poisonings	All Other Illnesses
2013	23	1	0	0	0
2014	21	0	0	0	0
2015	17	0	0	0	0
2016	28	0	0	0	0
2017	31	0	0	0	0
2018	18	0	0	0	0
2019	19	0	0	0	0
2020	29	0	0	0	0
2021	18	0	0	0	0
2022	20	3	1	0	0
Average	22.4	0.4	0.1	0	0
Variance	-2.4	2.6	0.9	0	0

The information in Table 3 for 2022 is consistent with prior years and the 10-year average. The Department has no additional comments.

The following table summarizes MP's most recent and past reports regarding property damage claims that occurred because of downed wires or other electrical system failures.

Table 4: Property Damage Claims (2013 – 2022)

	Claims	Total Amount Paid
2013	35	$71,796.27
2014	23	$26,939.32
2015	29	$76,375.92
2016	16	$15,466.26
2017	4	$4,364.27
2018	10	$22,374.13
2019	13	$111,048.35
2020	13	$40,594.36
2021	16	$67,487.13
2022	20	$120,097.36
Average	17.9	$55,654.337
Variance	2.1	$64,443.023

In 2022 Minnesota Power paid out property damage claims at a higher rate – and for a significantly higher total annual amount – than the ten-year average. The Department specifically notes that $35,874.48 of property damage claims were attributed to vehicle damage by the Company and requests further discussion from MP in reply comments about what safety awareness and/or trainings it has or intends to implement to mitigate incidents of vehicle damage.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0400.

C. ANNUAL RELIABILITY REPORT

Minnesota Rules 7826.0500 requires each utility to file an annual report with the following information:

1. reliability performance,
2. storm-normalization method,
3. action plan for remedying any failure to comply with the reliability standards,
4. bulk power supply interruptions,
5. major service interruptions,
6. circuit interruption data (identify worst performing circuit),
7. known instances in which nominal electric service voltages did not meet American National Standards Institute (ANSI) standards,
8. work center staffing levels, and
9. any other relevant information.

i. Reliability Performance

The Commission adopted a new methodology for benchmarking electric utility reliability for the three investor-owned utilities (IOUs) operating in Minnesota in its Order in Docket No. E002/M-20-404 dated December 18, 2020.[3] Specifically, the Commission required "utilities to report reliability based on the traditional five-year rolling average at the work-center level but required utilities to use the [Institute of Electrical and Electronic Engineers] IEEE benchmarking to measure system-wide performance."[4]

In that same Order the Commission required the utilities to discuss and propose a transition to a full benchmarking approach to setting reliability standards. In advance of the transition, the Commission delegated authority to the Executive Secretary to continue conversations with utilities and other

[3] Order Accepting Reports Requiring Additional Filings and Establishing Workshop in Docket Nos. E002/M-20-406 (Xcel), E017/M-20-401 (Otter Tail Power) and E015/M-20-404 (Minnesota Power).
[4] *Id.* at page 3.

interested parties on the definition of work-centers, the process for benchmarking individual work centers and other considerations for the transition to benchmarking.[5]

Finally, the Commission set the service territory-wide reliability standards for the IOUs using the IEEE benchmarking information instead of the traditional rules-based approach:

- Minnesota Power's service-territory wide reliability standard at the IEEE benchmarking second quartile for medium utilities.
- Otter Tail Power's service-territory wide reliability standard at the IEEE benchmarking second quartile for medium utilities.
- Xcel Energy's service-territory wide reliability standard at the IEEE benchmarking second quartile for large utilities.

The Commission extended the IEEE benchmarking methodology to the work-center level for the three IOUs in its Order dated March 2, 2022, in Docket Nos. E002/M-21-237 (Xcel), E017/M-21-235 (Otter Tail Power) and E015/M-20-230 (Minnesota Power). Specifically, the Commission adopted the following benchmarks:

- Minnesota Power –
    - Service territory-wide – second quartile for medium utilities.
    - Work-center – second quartile for small utilities.
- Otter Tail Power Company –
    - Service territory-wide – second quartile for medium utilities.
    - Work-center – second quartile for medium utilities.
- Xcel Energy –
    - Service territory-wide – second quartile for large utilities.
    - Work-center –
        - Southeast and Northwest - second quartile for medium utilities.
        - Metro East and Metro West – second quartile for large utilities.

Given that IEEE doesn't publish its benchmarking results for the prior year until August of the following year, the three IOUs don't yet know where they stand relative to those benchmarks for 2022 and will make a supplemental filing in September providing this information. Table 5 below provides this information for MP for 2021.

[5] *Id.* at Order Point 6, p. 7.

Table 5: Minnesota Power 2021 Reliability Performance vs. IEEE Benchmark Goal

Work Center	Metric	2021 IEEE Benchmarks	2021 MP Actuals	Met Benchmark?
Central	SAIDI	201.00	94.84	Yes
	SAIFI	1.46	1.20	Yes
	CAIDI	89.00	79.36	Yes
Northern	SAIDI	201.00	158.19	Yes
	SAIFI	1.46	1.25	Yes
	CAIDI	89.00	126.45	No
Western	SAIDI	201.00	164.95	Yes
	SAIFI	1.46	1.53	No
	CAIDI	89.00	99.16	No
System	SAIDI	136.00	126.00	Yes
	SAIFI	1.08	1.34	No
	CAIDI	126.00	94.03	Yes

The Company's 2021 results are good overall, with performance better than the IEEE benchmarks for eight of the twelve metrics listed. The Company stated that weather and overhead equipment failures continued to be the largest contributor to outages caused in 2021 and indicated that it was in its second year of strategically undergrounding lines in areas with known reliability issues and will be increasing the budget for this effort. Alongside these undergrounding projects, MP hired a Distribution Grid Modernization engineer to oversee grid modernization and the deployment of automated equipment to reduce outage restoration times.[6]

The following table shows the Company's 2022 statewide and work center reliability performance compared with the 2021 goals set to IEEE second quartile medium (statewide) and small (work center) utilities.

[6] Minnesota Power Company. Compliance Filing. Docket No. E015/M-22-163. August 29, 2022. Accessed at: https://www.edockets.state.mn.us/edockets/searchDocuments.do?method=showPoup&documentId={D07BEA82-0000-CC15-AF36-AA7A9536BAC7}&documentTitle=20228-188628-01

Table 6: MP's 2022 Reliability Performance Compared with 2021 IEEE Goals

Work Center	Metric	2022 Performance	2021 Goals
Central	SAIDI	94.77	201.00
	SAIFI	0.96	1.46
	CAIDI	98.72	89.00
Northern	SAIDI	121.10	201.00
	SAIFI	0.89	1.46
	CAIDI	136.07	89.00
Western	SAIDI	140.89	201.00
	SAIFI	1.53	1.46
	CAIDI	92.08	89.00
System	SAIDI	112.70	136.00
	SAIFI	1.12	1.08
	CAIDI	99.68	126.00

Text highlighted in red in Table 6 indicate reliability goals that were not met when comparing 2022 actuals to 2021 goals. While the Department notes that this comparison is not required given the new benchmarking approach the Commission adopted in Docket No. E015/M-20-230, it does provide Commission staff, Commissioners, and other interested parties a point of reference for MP's actual 2022 reliability results compared to most recent goals.

While the IEEE 2021 results provide a useful proxy for the yet-to-be-calculated 2022 IEEE reliability results, the Department will provide additional comments after MP provides the 2022 IEEE benchmarking information later this year.

Based on its review of Minnesota Power's 2022 system-wide reliability requirements reporting, the Department concludes the Company appears to have fulfilled the requirements of Minnesota Rules, part 7826.0500, subp. 1A, B, and C.

ii. Storm-Normalization Method

MP used the IEEE 2.5 beta method for storm normalization, which excludes data due to major events such as large storms. To determine which singular events should be excluded from the reliability metrics data, MP compares the SAIDI for individual events to IEEE's Major Event Threshold. In cases where a storm or other event MP experienced has a greater SAIDI than the IEEE Major Event Threshold, those major events are removed from the data, and this time-period is called a Major Event Day (MED). In 2022, MP had six MEDs, which is well above the five-year average of 2.8 MEDs/year and equal to the total amount of MEDs on MP's system in the previous three years combined.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1D.

iii. Action Plan to Improve Reliability

The Company provided updates to its ongoing efforts to enhance its reliability programming via new engineering staff hires, implementation of a trouble order tracking and remediation system put in place in 2018, continual auditing of the system to develop an asset management preventative maintenance program, and enhancements to inspection scheduling and technologies to proactively identify areas for investment.

The Department issued an information request (IR) to MP requesting further explanation of the information and criteria used by the Company to determine and document equipment condition, establish trends and expected failure assumptions, and prioritize projects for inclusion in the asset management and replacement plan. MP responded with a detailed description of how the Company aligns and tracks work orders, service requests, scheduled inspections, and preventative maintenance actions for its distribution and substation equipment. The Department finds this explication to be valuable to this discussion and has included MP's IR response in its entirety to these comments as Attachment A.[7]

The Department acknowledges MP fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.E.

iv. Bulk Power Supply and Major Service Interruptions

Minnesota Rules 7826.0500, subp. 1.F requires utilities to report information on each interruption to a bulk power supply facility during the calendar year. Minnesota Rules 7826.0500, subp. 1.G requires utilities to submit a copy of each major service interruption report submitted to the Commission's Consumer Affairs Office (CAO).[8] The Commission's December 18, 2020 Order granted all three utilities a variance to Minnesota Rules 7826.0500, subp. 1.G; in lieu of these report copies, each utility may simply submit a summary table of the reports in its annual SRSQ Report.

Minnesota Power identified nineteen bulk power interruptions to its system in 2022. These outages occurred on six feeders which are summarized below along with the total outage durations for the year, the primary cause of the outage identified by the Company, and mitigation actions under consideration by MP to prevent future system outages:[9]

[7] Attachment A. Minnesota Power Reply to DOC IR-10.
[8] Minnesota Rules 7826.0700 requires electric utilities to submit major service interruption reports to the Commission's CAO.
[9] Attachment B. Minnesota Power Reply to DOC IR-11

Table 7: MP 2022 Bulk Power Interruptions Summary

Feeder	Total Outage Duration in 2022	Primary Cause(s)	Mitigation Actions
198 Line (Bear Creek)	9.5 hours	Weather, UG equipment	Vegetation management (VM) to be completed in 2023, new switch added near new Hinckley West substation
23 Line (Bear Creek)	4.5 hours	Weather	Recloser being added to feeder to sectionalize heavily wooded section, battery storage pilot for feeder in initial planning stages
23 Line (Thomson)	5.4 hours	Weather	
32 Line (Tower-Winton)	1 hour	Weather	VM to be completed 2023, line rebuild and upgrade planned for 2031
33 Line (Winton)	8.6 hours	Weather	VM completed in 2022, rebuild and reconductoring to begin in 2024
59 Line (Mahtowa-Sandstone)	11.9 hours	Weather	Rebuilding and upgrading line in progress, est. completion 2026, new remote control capabilities added to switches in 2023, adding tie between 23 and 59 Lines

The Department notes that the 23 Line (Bear Creek) experienced five bulk power interruptions in 2022, up from two such events reported in 2021. The 33 Line (Winton) experienced one bulk power interruption in both 2021 and 2022.

Based on its review of Minnesota Power's 2021 bulk power supply facility reliability reporting metrics, the Department concludes the Company appears to have fulfilled the requirements of Minnesota Rules 7826.0500, subps. 1.F and 1.G.

v. Worst Performing Circuit

MP reported the four worst-performing feeders (two urban and two rural) for each of its three work centers, for a total of 12 feeders. The Department summarizes the 2022 information in Table 8.

The Department notes:

- The highest SAIDI results were for a feeder located in an urban area in the Central work center and in a rural area in the Northern work center.
- The highest CAIDI results were for a feeders located in urban areas in the Central and Northern work centers.
- The St. Croix 1 feeder had the highest SAIDI for an urban feeder in the Central work center for the second year in a row

The Department reviewed MP's historical data for worst-performing feeders and notes none of the feeders identified in the Report appear to present recurring reliability issues, except for the St. Croix 1 feeder in the Northern work center.

Table 8: Summary of Minnesota Power's 2022 Worst-Performing Feeders in Urban Areas in Central, Northern, and Western Work Centers

	Criteria	Work Center	Circuit	# of Customers	SAIDI	SAIFI	CAIDI
Urban	High SAIDI	Central	Hinckley West 461	585	701.77	5.11	137.33
		Northern	St. Croix 1	161	573.23	1.35	424.61
		Western	Cotton Tail Drive 1	54	636.94	3.02	210.91
	High CAIDI	Central	Gary 101	1,307	404.36	1.14	354.70
		Northern	Hat Trick 321	1,669	121.49	0.95	127.88
		Western	Long Lake 541	1,705	216.95	2.67	81.25
Rural	High SAIDI	Central	Hinckley West 462	334	660.88	5.07	130.35
		Northern	Nashwauk 318	28	1037.61	8.43	123.09
		Western	Walker Sub 2 Fdr 1	632	605.96	4.93	122.91
	High CAIDI	Central	Sandstone 452	1,248	450.56	3.63	124.12
		Northern	Lind Greenway 334	870	451.74	3.24	139.43
		Western	Walker Sub 2 Fdr 1	632	605.96	4.93	112.91

MP provided summaries of the remediation actions under consideration to address reliability issues on the worst performing feeders in each of its work centers which the Department outlines below:

- Central Work Center. The Hinckley West substation was rebuilt in 2022, the Company is looking for opportunities to strategically underground the distribution system assets to increase storm resiliency.[10]
- Northern Work Center. The Northern Engineering team is building and reviewing a plan that could improve feeders by reconfiguring, strategically undergrounding, adding additional feeders into this area, and adding automation technologies to rural feeders.[11]
- Western Work Center. The Company has initiated 2023 strategic undergrounding projects and continuing the asset management program to find, repair and replace equipment in this work center.[12]

The Department acknowledges MP fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.H.

vi. *Compliance with* American National Standards Institute *Voltage Standards*

MP provided a table listing the feeders and number of known occurrences where the voltage fell outside the American National Standards Institute (ANSI) C84.1 service voltage Range B (plus 6 percent to minus 13 percent of nominal) in 2022. The Company reported 16 instances of voltage violations in 2022 attributed to weather (3 instances), vegetation (3 instances), overhead (3 instances) and underground (4 instances) equipment, or unknown causes (3 instances). The Department notes that this is an improvement over the 24 reported voltage violations in 2021, but observes no further significant trend regarding this metric.

The Department acknowledges MP fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.I.

vii. *Work Center Staffing Levels*

Minnesota Power also provided work center staffing data, including the number of full-time employees, in 2022 in Table 11 on page 52 of the filing. The Department compares the Company's metrics for 2021 and 2022 in the following tables:

[10] MP 2022 SRSQ Report, at 54.
[11] *Id.,* at 55.
[12] *Id.,* at 56.

Table 9a: Comparison of Minnesota Power's 2021 and 2022 Central Work Center Staffing Levels

Description	2021	2022	Annual Percentage Change
Line Operations Field Workers -Line	46	49	7%
Line Operations Field Workers -Substation	9	8	-11%
Line Operations Support - OPS	1	1	0%
Line Operations Support – Line	9	9	0%
Line Operations Support – Fleet	7	9	29%
Line Operations Support – Substation	1	2	100%
Line Operations Support - Inventory	None reported	7	Not applicable
Engineering Support - Distribution	19	24	26%
Engineering Support - Meters	13	13	0%
Engineering Support - GIS	8	9	13%

Table 9b: Comparison of Minnesota Power's 2021 and 2022 Northern Work Center Staffing Levels

Description	2021	2022	Annual Percentage Change
Line Operations Field Workers -Line	26	25	-4%
Line Operations Field Workers -Substation	7	8	14%
Line Operations Support - OPS	1	1	0%
Line Operations Support – Line	1	1	0%
Line Operations Support – Fleet	3	3	0%
Line Operations Support – Substation	1	1	0%
Line Operations Support - Inventory	None reported	3	Not applicable
Engineering Support - Distribution	7	7	0%
Engineering Support - Meters	1	1	0%
Engineering Support - GIS	1	1	0%

Table 9c: Comparison of Minnesota Power's 2021 and 2022 Western Work Center Staffing Levels

Description	2021	2022	Annual Percentage Change
Line Operations Field Workers -Line	30	30	0%
Line Operations Field Workers -Substation	5	5	0%
Line Operations Support - OPS	1	1	0%
Line Operations Support – Line	2	2	0%
Line Operations Support – Fleet	3	3	0%
Line Operations Support – Substation	None reported	None reported	Not applicable
Line Operations Support - Inventory	None reported	3	Not applicable
Engineering Support - Distribution	7	7	0%
Engineering Support - Meters	4	4	0%
Engineering Support - GIS	1	1	0%

Table 9d: Comparison of Minnesota Power's 2021 and 2022 Common Staff Between Work Centers Staffing Levels

Description	2021	2022	Annual Percentage Change
Line Operations - Service Dispatch	None reported	8	Not applicable
Line Operations – System Operations	18	20	11%
Line Operations – Veg. Management	3	3	0%
Engineering Support - Transmission	6	6	0%
Engineering Support - Substation	13	18	38%
Contractors – Line	22	25	14%
Contractors - Groundline	2	10	400%
Vegetation	75	68	-9%

The Company's staffing levels appear to be consistent between 2021 and 2022 except for:

- Line Operations Support – Inventory: MP reported 13 employees with this new job description not reported in 2021.
- Contractors – Groundline: Increased contractor support shared between work centers by 400 percent
- The Central work center saw increases to 50 percent of its job categories, and the Northern and Western work centers saw increases to only two and one job categories, respectively.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1J.

viii. Other Information

MP used this section of MP's Annual Report to provide information regarding the Company's normalized and non-normalized results by work center for the following metrics:

- CEMI +3 to +6;
- CELI for 6, 12 and 24 hours, and

- Estimated Time of Restoration Time (ETR).

The Department discusses this topic further in its compliance review regarding that Order in a subsequent section of these comments.

The Department appreciates MP's efforts and additional information and acknowledges MP fulfilled the requirements of Minnesota Rules 7826.0500, subp. 1.K.

D. RELIABILITY STANDARDS FOR 2022

The Commission set MP's 2021 and subsequent statewide reliability standards at the IEEE benchmarking second quartile for medium utilities in its Order dated March 2, 2022, in Docket No. E015/M-21-230. The Commission also set MP's and work center reliability standards at the IEEE benchmarking second quartile for small utilities. This Commission decision represented a departure from the reliability performance standards delineated in Minnesota Rules 7826.0600.

The Commission's current approach identifies the various IEEE calculated reliability benchmarks as the goals for the Minnesota's three investor-owned utilities (IOUs). Table 10 compares MP's system-wide 2022 reliability results with the IEEE 2021 results. The IEEE 2021 results only serve as a proxy in this comparison for the yet to be calculated 2022 IEEE reliability results, which are typically provided in August the following year.

Table 10: MP System-wide 2022 Actual Reliability Compared to 2021 IEEE Results

Reliability Metric	Actual Performance	2021 IEEE Median Normalized Medium Sized Utility Results	Would Goal Have Been Met?
SAIFI	1.12	1.08	no
SAIDI	112.70	136	yes
CAIDI	100.89	126	yes

As the above table illustrates, the Company could meet the Commission's 2022 reliability goals at the service territory-wide level for SAIDI and CAIDI if the 2021 IEEE benchmark results remain constant or do not improve, but would not have met the SAIFI goal. Given that this comparison is something of a hypothetical, the Department will not provide work-center level information until the Company provides the actual 2022 IEEE results in a supplemental filing sometime in August 2023.

E. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules 7826.1300 requires each utility to file information regarding the following:

1. Meter Reading Performance (7826.1400),
2. Involuntary Disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),

4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

1. Meter Reading Performance

The following information is required for reporting on monthly meter reading performance by customer class:

A. the number and percentage of customer meters read by utility personnel;
B. the number and percentage of customer meters self-read by customers;
C. the number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months;
D. data on monthly meter reading staffing levels, by work center or geographical area.

Minnesota Power provided detailed meter reading information, including information on its monthly meter reading staffing levels. Table 11 summarizes MP's meter reading statistics.

Table 11: Meter-Reading Performance 2013 – 2022

	Company Read	Customer Read or Estimated	Customer Read (%)
2013	132,705	19	0.01%
2014	133,647	32	0.02%
2015	143,887	67	0.05%
2016	149,832	73	0.05%
2017	149,991	73	0.05%
2018	150,069	73	0.05%
2019	150,157	75	0.05%
2020	153,075	1,921	1.24%
2021	154,705	842	0.54%
2022	154,148	471	0.30%

MP's meter-reading performance over the years has remained consistent and 2022 was no departure from this trend, indicating continued recovery from COVID-19 related restrictions as the number of customer-read meters continues to trend downwards in 2022.

Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March are read monthly. The Company's information reflects that it read at least 99 percent of all meters each month during 2022. According to MP, there were 16 meters that were not read for a period of 6-12 months in 2022. This compares to 50 meters that were not read over the

same period in 2021. Additionally, the Company explained that these meters were not able to be read due to no access to the meter location and/or the meter is of the automated meter reading (AMR) type.

The Company reported it maintained an average of approximately 5.6 meter-reading customer service representatives in 2022. This number increased slightly from 5.4 reported in 2021.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.1400.

2. Involuntary Disconnections

The following information is required for reporting on involuntary disconnection of service by customer class and calendar month:

A. the number of customers who received disconnection notices,
B. the number of customers who sought cold weather rule protection under Minnesota Statutes, sections 216B.096 and 216B.097, and the number who were granted cold weather rule protection,
C. the total number of customers whose service was disconnected involuntarily, and the number of these customers restored to service within 24 hours, and
D. the number of disconnected customers restored to service by entering into a payment plan.

Table 12: Residential Customer Involuntary Disconnection Information

	Received Disconnect Notice	Sought CWR Protection	Granted CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 Hours	Restored by Entering Payment Plan
2013	40,451	2,617	2,612	99.8%	3,171	1,122	576
2014	35,796	2,852	2,852	100.0%	3,257	799	443
2015	22,537	2,173	2,173	100.0%	520	154	56
2016	12,191	2,916	2,916	100.0%	1,933	213	634
2017	17,454	3,475	3,475	100.0%	2,668	1,284	1,680
2018	18,961	4,311	4,311	100.0%	2,492	1,219	1,592
2019	16,049	4,232	4,232	100.0%	2,138	1,056	1,357
2020	5,925	2,845	2,845	100.0%	298	149	206
2021	17,523	1,295	1,295	100.0%	1,019	566	546
2022	21,538	2,404	2,404	100.0%	2,027	1,295	1345

The Company reported that 22,688 disconnection notices were sent to residential, commercial, and industrial customers in 2022, with 21,538 of these notices being for residential customers. This number is indicative of the general trend back towards the previous annual averages prior to the moratorium on disconnections during the COVID-19 pandemic.

While the increases in the number of customers seeking Cold Weather Rule protections and receiving disconnection notices in 2022 are concerning, the Department notes the annual number of customers in these reporting categories has been trending downward over the past 10 years as shown in Figures 1 and 2 below.

Figure 1: Number of Customers Seeking Cold-Weather Rule Protection (2013 -2022)

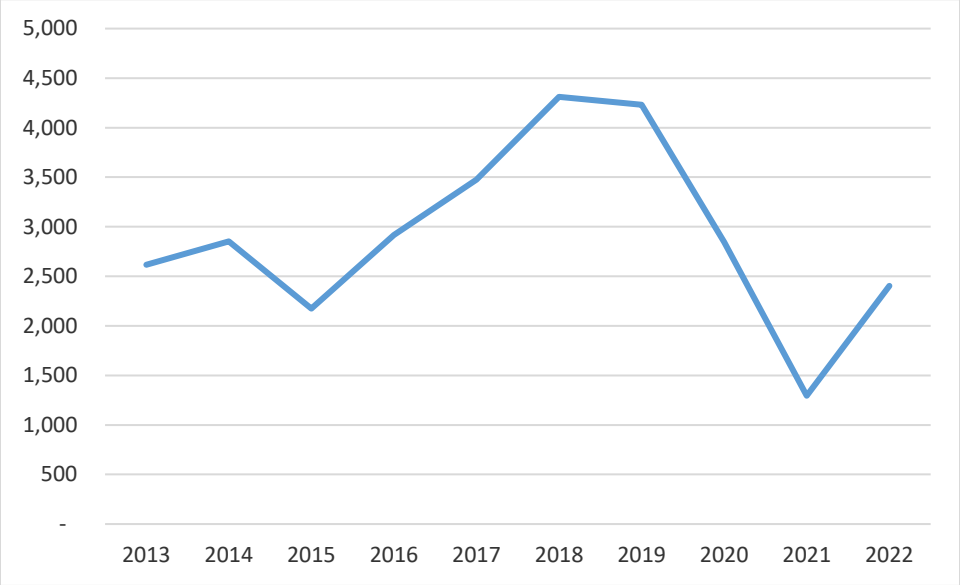
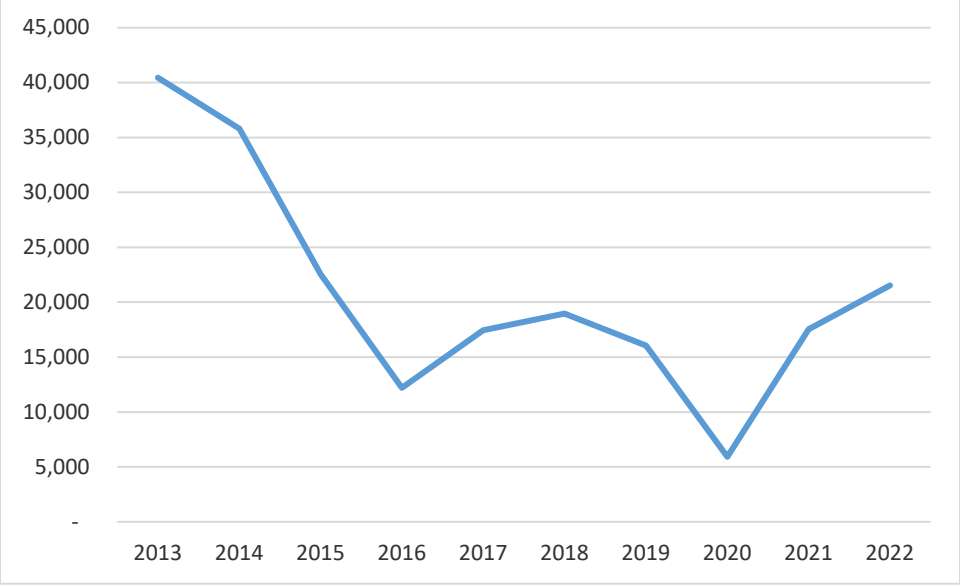


Figure 2: Number of Customers Receiving Disconnection Notices (2013 -2022)



Based on its review of Minnesota Power's 2021 involuntary disconnection service quality reporting requirements, the Department concludes MP met the reporting requirements of Minnesota Rules 7826.1500.

3. Service Extension Requests

The following information is required for reporting on service extension request response times by customer class and calendar month:

A. The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

For new service extension requests MP reported a total of 816 residential installations, 116 commercial installations, one industrial installation, and 19 municipal installations. MP met the requested in-service date for residential installations 78 percent of the time, its commercial installations 63 percent of the time, its industrial installations zero percent of the time, and its municipal installations 79 percent of the time. MP stated the primary reasons for not meeting an in-service date in 2022 were failures due to MP unable to meet the date (8.4 percent), customer not ready (7.8 percent), and weather (2.63 percent). MP stated that supply chain issues specifically for transformers and meter pedestals were the primary driver behind MP not being able to meet the agreed-upon date.[13]

For extension requests to a previously served location, MP reported a total of 413 residential installations, 24 commercial installations, zero industrial installations, and zero municipal installations. MP met the requested in-service date for residential installations 99 percent of the time and commercial installations 100 percent of the time. Results for industrial and municipal installations could not be calculated. MP stated the primary reasons for not meeting an in-service date in 2022 were Dates Met, such as when customers requested service on a Friday and Minnesota Power installed the meter on Monday.[14]

Based on its review of Minnesota Power's 2022 service extension service quality reporting requirements, the Department concludes MP met the reporting requirements of Minnesota Rules 7826.1600.

[13] MP 2022 SRSQ, at 86.
[14] *Id.,* at 89.

4. Call Center Response Times

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Further, Minnesota Rules, part 7826.1200 requires that 80 percent of all calls be answered within 20 seconds.

Minnesota Power reported in 2022, the Company answered 45 percent of calls during business hours (7:00 am to 5:30 pm) within 20 seconds and the Company met or exceeded the 80% goal threshold in one out of 12 months of the year. This is a decrease in performance from 2021, when MP answered 50 percent of calls during business hours within 20 seconds and met the 80% goal threshold in two of the twelve months of the year. Minnesota Power reported in 2020, the Company answered 41 percent of calls during non-business hours (5:30pm to 7:00pm) within 20 seconds, again down from 2021's performance of 49 percent.

The Company attributed its poor performance in meeting the goal threshold in 2022 to changes and challenges that impacted call response times: continuing COVID-19 impacts, residential rate transition to Time-of-Use (TOU), attrition in the Call Center, and unplanned absences.[15]

In 2022 MP transitioned nearly all of its Customer Care and Support Representatives (CCSRs) from a remote work environment back to the office location as COVID-19-related restrictions ended. This was done to improve response time through increased collaboration, real-time coaching, and peer-to-peer learning.[16] In response to a Department IR requesting more specific information on how this return-to-work affected recruitment and retention efforts MP explained that the Company does still allow work from home as an option under three scenarios: 1) outages, 2) inclement weather, and 3) quarantine purposed – balancing call center responsiveness with the Company's safety-first values.[17] The Company further explained that the mandatory office setting is not having a deleterious effect on recruitment as "the majority of incoming candidates have shared that they actually prefer and office setting."[18]

In DOC IR-14 the Department asked the Company to provide data used to benchmark MP against its peers regarding the wages offered for call center positions. The Company first noted that its call center employees are represented by the International Brotherhood of Electrical Workers Local Number 31 and because of this their wages and benefits are negotiated. The Company stated that the starting wage for CCSRs is $23.17 per hour with a six-month progression rate of $25.74 per hour, and this rate is competitive with call center wages of the other IOUs in Minnesota and nationally that offer wages in the range of $14 to $25 per hour.

[15] MP 2022 SRSQ, at 91.
[16] *Id.*
[17] Attachment C. Company Reply to DOC IR-14.
[18] *Id.*

The Company explained how the confluence of calls to its Call Center as collections resumed after COVID-19, efforts to address arrears pay down for LIHEAP customers and next-year LIHEAP applications, Customer Affordability of Residential Electricity affordability discount renewal applications, Cold Weather Rule inserts beginning to be received by customers, and customer inquiries regarding the transition from an inclining-block rate to a general TOU rate for residential customers all occurred early in 2022 as the Company faced simultaneous staffing shortages from attrition and workplace absences.[19] MP noted that the issues listed immediately above are among the most complex customer interactions the Company typically has in its call center, and these longer individual call durations combined with staffing shortages and unavailability were the primary driver of the Company failing to meet call center response goals throughout 2022.

The Company instituted work processes changes and attempted to accelerate hiring additional staff support in response to these challenges. The Company shortened the default call wrap time for representatives to document calls from three to two minutes to encourage employees to return to the call queue as quickly as possible. MP began offering a dedicated phone line for agencies that process energy assistance applications with a direct point of contact in December of 2022 to both alleviate pressure on the general call queue and ensure timely response to customers and agencies seeking LIHEAP resources.

The Company noted that as a result of these efforts call center response time reflected a 78 percent response rate in January, 88 percent in February, and 82 percent in mid-March (the time of the Company's preparation of the 2022 SRSQ Report).[20] The Department requests that the Company provide monthly data on its call center response time goals through the first half of 2023 in reply comments.

While MP's 2022 call center response results remain unsatisfactory into 2022, the Department notes the positive changes taken by the Company to address this issue and anticipates improvements throughout 2023. However, the Department cautions that many of the challenges mentioned by the Company relating to the overlap of various program enrollment periods will not be unique to 2022 recommends extra attention in monitoring this situation for the next couple of years to see if the Company can respond successfully to this new post-pandemic environment and managing customer engagement surrounding its ongoing and planned initiatives.

Based on its review of Minnesota Power's 2021 call center service quality reporting requirements, the Department concludes MP met the reporting requirements of Minnesota Rules 7826.1700.

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[19] MP 2022 SRSQ, at 91-93.
[20] *Id.,* at 91.

5. Emergency Medical Accounts

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes section 216B.098, subd. 5, the number of requests granted, and the number denied, including the reasons for each denial.

MP reported that 102 customers requested emergency medical account status and 102 of these requests were granted after customers provided the correct information, this is an increase from 73 customers requesting emergency medical account status in 2021. The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules, part 7826.1800.

6. Customer Deposits

Minnesota Power stated it refunded all deposits in 2014 and while the Company does not currently require deposits from customers, it remains open to reconsideration on the matter in the future. The Department notes this 2014 figure has been used in each of MP's SRSQ Reports since 2014.

Based on its review of Minnesota Power's 2022 customer deposits service quality reporting requirements, the Department concludes MP met the reporting requirements of Minnesota Rules 7826.1900.

7. Customer Complaints

The reporting on customer complaints must include the following information by customer class and calendar month:

A. the number of complaints received;
B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
D. the number and percentage of all complaints resolved by taking any of the following actions:
   (1) taking the action the customer requested;
   (2) taking an action the customer and the utility agree is an acceptable compromise;
   (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or
   (4) refusing to take the action the customer requested; and
E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office (CAO) for further investigation and action.

MP's report on customer complains includes the required information. Table 13 below contains a limited summary of MP's customer complaint history.

Table 13: Minnesota Power's Customer Complaint Totals 2016-2022

	Residential	Commercial	Industrial	Total
2016	388	46	0	434
2017	641	56	0	697
2018	559	71	0	630
2019	478	47	0	525
2020	485	60	0	545
2021	469	44	0	513
2022	297	49	0	346

The Department notes the continuing improvement in customer complaints by class and in aggregate in 2022, with the values for each metric well below the five-year average.

Table 14 below provides a breakdown of complaints by type.

Table 14: Customer Complaints Selected Summary 2017 – 2022

	Number of Complaints	Billing Error	High Bill	Inadequate Service	Incorrect Metering	Service Restoration	Wrongful Disconnection
2017	694	1.44%	77.81%	5.62%	13.11%	0.14%	1.87%
2018	630	1.59%	68.09%	6.19%	22.38%	0.32%	1.43%
2019	525	4.57%	69.33%	5.90%	19.24%	0.57%	0.38%
2020	545	4.22%	78.72%	4.77%	11.19%	0.73%	0.37%
2021	513	3.12%	81.48%	6.24%	9.16%	0.00%	0.00%
2022	346	5.78%	81.91%	4.63%	5.49%	1.16%	0.87%

MP noted it received 32 customer complaints that were forwarded to the utility from the Commission's Consumer Affairs Office (CAO), an 18 percent increase from the 27 complaints so received in 2021.

Based on its review of Minnesota Power's 2021 customer complaint service quality reporting requirements, the Department concludes MP has met the reporting requirements of Minnesota Rules 7826.2000.

E. COMPLIANCE WITH PERTINENT COMMISSION ORDERS

1. 2018 SRSQ Report - January 28, 2020, Order

The Commission's January 28, 2020 Order in Docket No. E015/M-19-254 included Attachment B, which updated the annual reporting requirements for the Company. Attachment B required MP to report the following :

a. Non-normalized SAIDI, SAIFI, and CAIDI values;
b. SAIDI, SAIFI, and CAIDI values calculated using the IEEE 2.5 beta method;
c. MAIFI, normalized and non-normalized;
d. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6;
e. The highest number of interruptions experienced by any one customer;
f. CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours;
g. The longest experienced interruption by any one customer (or feeder);
h. A breakdown of field versus office staff required;
i. Estimated restoration times;
j. IEEE benchmarking;
k. Performance by customer class; and
l. More discussion of leading causes of outages and mitigation strategies.

The Department summarizes MP's compliance with each reporting requirement in turn.

a) Non-normalized SAIDI, SAIFI, and CAIDI values

MP provided this information in Table 10 on page 49 of its 2022 SRSQ Report. The following tables show the normalized and non-normalized values for SAIDI, SAIFI, and CAIDI as the Company reported. As there were six Major Event Days (MEDs) during 2022 these numbers are not identical.

Table 15: 2022 Normalized and Non-normalized SAIDI, SAIFI, and CAIDI

Description	SAIDI	SAIFI	CAIDI
Central work center			
Non-normalized	332.27	1.72	193.18
Normalized	94.77	0.96	98.72
Northern work center			
Non-normalized	332.03	1.43	232.19
Normalized	121.10	0.89	136.07
Western work center			
Non-normalized	885.16	2.98	297.03
Normalized	140.89	1.53	92.08
Overall			
Non-normalized	496.57	2.05	242.27
Normalized	112.70	1.12	100.89

b) SAIDI, SAIFI, and CAIDI values calculated using the IEEE 2.5 beta method

See Table 10 above.

c) MAIFI – normalized and non-normalized

Table 16 below shows the Company's normalized and non-normalized MAIFI for 2022. There were six MEDs in 2021, so these numbers are not identical.

Table 16: 2022 Normalized and Non-Normalized MAIFI

Description	Non-Normalized	Normalized
Central WC	4.80	3.73
Northern WC	2.50	1.85
Western WC	6.20	3.85
MN Total	4.84	3.46

d) CEMI – at normalized and non-normalized outage levels of 4, 5, and 6

MP provided this information in page 52 of its Annual Report. Table 12 below shows the Company's CEMI performance for 2022 at various intervals.

Table 17: 2022 Non-Normalized and Normalized CEMI 3, 4, 5, 6 (%)

Work Center	+6	+5	+4	+3
Central				
Non-normalized	7.38%	4.00%	0.00%	6.35%
Normalized	0.00%	2.15%	0.00%	4.8%
Northern				
Non-normalized	0.12%	0.00%	7.01%	10.12%
Normalized	0.12%	0.00%	0.44%	3.78%
Western				
Non-normalized	4.92%	7.33%	8.22%	19.85%
Normalized	0.00%	0.02%	2.81%	11.06%

e) Highest number of interruptions by any one customer (or feeder, if customer level is not available)

MP provided this information on page 53 of its Annual Report by work center:

- Askov 6521: 5.39 outages (Central).
- Nashwauk 318: 8.43 outages (Northern).
- Sylvan H.E. 502: 5.50 outages (Western).

f) CELI – at intervals of greater than 6 hours, 12 hours, and 24 hours

MP provided this information by work center on page 59 of its 2022 SRSQ Report. Table 18 below shows the Company's CELI performance for 2022 at various intervals.

Table 18: 2022 CELI at 6, 12, and 24 Hours – Non-Normalized and Normalized by Work Center

Work Center	6 hr.	%	12 hr.	%	24 hr.	%
Central						
Non-normalized	6755	8.68%	5030	6.46%	2474	3.18%
Normalized	2155	2.77%	98	0.13%	10	0.01%
Northern						
Non-normalized	5615	24.41%	891	3.87%	377	1.64%
Normalized	860	3.74%	10	0.04%	0	0.00%
Western						
Non-normalized	18283	42.87%	10078	23.63%	3037	7.12%
Normalized	397	0.93%	18	0.04%	12	0.03%

g) Longest interruption experienced by any one customer

MP provided this information by work center on page 59 by work center:

- Central: 5,714 minutes, affected one customer
- Northern: 3,818 minutes, affected one customer
- Western: 4,850 minutes, affected one customer

h) A breakdown of field vs office staff required

Department previously discussed this information above and provided the information in Tables 9a through 9d of these comments.

i) Estimated time of restoration

The Company provided this information on page 60 of the Report. MP's Outage Management System estimated the accuracy of the initial estimated time of restoration (ETR) to be 87% accurate and the final ETR's to be 98% accurate, the Department notes these are the same values reported in 2021.

j) IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI

This requirement was superseded by a similar requirement in the Commission's Order dated March 2, 2022, in Docket No. E015/M-21-230.

k) Performance by customer class

Minnesota Power provided this information on page 60 of the Report. Table 19 recreates this information.

Table 19: Minnesota Power's 2022 Reliability Metrics by Customer Class

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized	99.91%	422.36	1.74	242.73	4.12
	Normalized	99.98%	95.86	0.95	100.90	2.94
Commercial	Non-normalized	99.98%	73.99	0.31	238.67	0.72
	Normalized	99.99%	16.79	0.17	98.76	0.52
Industrial	Non-normalized	99.99%	1.19	0.00	N/A	0.01
	Normalized	99.99%	0.27	0.00	N/A	0.01

l) More discussion of leading causes of outages and mitigation strategies

MP provided this information in its discussion of factors affecting reliability reporting in Section II.A of the Annual Report and discussed mitigation strategies from grid modernization projects in Section III.A of the Annual Report.

The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission's January 28, 2020 Order in Docket No. E015/M-19-254.

2. Reconnect Pilot Program Order – December 9, 2020, Order

On December 9, 2020, in Docket No. E015/M-19-766, the Commission approved Minnesota Power's proposal to implement its three-year Remote Reconnect Pilot Program (RRPP or Pilot). As part of this Order, the Commission directed the Company to report several performance metrics related to the Pilot in MP's Annual SRSQ Report. Minnesota Power delayed the RRPP's implementation due to the COVID-19 pandemic. The Company restarted the Pilot in June of 2021. Table 20 summarizes the information the Company provided regarding the RRPP.

Table 20: Remote Reconnect Pilot Program 2022 Summary

Reporting Requirement	Amount and Unit
Number of Participants	4,437 customers
Total Number of customers under the Low-Income Home Energy Assistance Program (LIHEAP)	8,875 customers/month*
Number of remote-connected participants with LIHEAP	823 customers
Number of customers who opted out of Pilot	24 customers
Estimated annual cost savings from the Pilot	($48,000)

*Average of monthly cumulative LIHEAP customers throughout 2022

Table 21: Remote Reconnect Pilot Program Comparison of Reconnection Times 2022 (days)

Description	Standard Process	RRPP Process	Percentage difference
Reconnection	10	9	-10%

MP noted that disconnection duration is heavily influenced by customer action, and thus the Company recalculated the average reconnection times after excluding those cases where the reconnection had a duration of ten days or more. Under this revised method, the average number of days under the pilot was 0.81, compared to 0.89 for non-pilot participants. For disconnection durations of 30 days or more,

pilot participants were reconnected in 1.81 days while standard collection process was 1.77, indicating that as the duration grows the impacts of the pilot and related technology are lessened.[21]

Table 22: Remote Reconnect Pilot Program Comparison of Reconnection within 24 Hours 2022

Description	Standard Process	RRPP Process	Percentage of Remote Disconnections
Reconnection	695	600	46%

The Company represented this Pilot as essentially an efficiency gain for both ratepayers and shareholders. MP would invest in more advanced meters (a capital expenditure) resulting in reduced ongoing labor costs. While the 2022 results are not entirely supportive of that narrative, the differences are apparently due to timing. The Company estimated the Pilot's incremental cost/benefit to be a negative $48,000 (costs were greater than benefits). MP incurred the cost of installing the new technology but has not had time without the influences of COVID-19-related protections and Commission-approved Transition Plan to realize the benefits associated with the investments in the new meters.

The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission's December 9, 2020 Order in Docket No. E015/M-19-766.

3. 2019 SRSQ Filing - December 18, 2020, Order

The Commission's December 2020 Order Points 14 and 16 in Docket No. E015/M-20-404 require utilities to include the following in their service quality reports:

> 14. For the two reporting cycles following the Commission's 2020 Order, each utility must report the data listed below, to the extent feasible. The Commission further specified that if a utility is unable to report the information, it must provide an explanation as to why the information is not filed and the plans for reporting the information in the future.
>
> a. Yearly total number of website visits;
> b. Yearly total number of logins via electronic customer communication platforms;
> c. Yearly total number of emails or other customer service electronic communications received; and
> d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700.

[21] MP 2022 SRSQ, at 83.

16. Each utility must file revised complaint categories.

a) Electronic Customer Communication – Summary 2022 Information

Minnesota Power included a discussion addressing Order Point 14 of the Commission's December 2020 Order on pages 64-65 of its Report.

Minnesota Power provided monthly page views of its website, Facebook, MyAccount, as well as the number of mobile app installations. The Department summarizes these annual figures in the table below for 2020 and 2021:

Table 23: Comparison of Minnesota Power's 2021 and 2022 Page Views and App Installations Totals

Description	2021 Results	2022 Results	Percentage Difference
Website	1,598,725	1,879,499	17.56%
MyAccount	490,667	850,123	73.26%
Mobile App Installations	8,506	8,332	-2.05%
Facebook	31,686	16,243	-48.74%
Instagram	30,647	1,086	-96.46%

Minnesota Power also provided a monthly summary of all emails received through the customerservice@mnpower.com email address, as well as a chart of the subject category of each email. The Department summarizes these annual figures for 2020 through 2022 in the table below:

Table 24: Comparison of Minnesota Power's 2020 - 2022 Annual Number of Emails Received and Approximate Number of Emails Received by Subject Category

Email Subject Category	2020 (approx.)	2021 (approx.)	2022 (approx.)
Fuel Assistance	5,600	7,000	7,500
Billing Inquiry	1,600	1,600	1,600
Miscellaneous	1,300	2,000	2,200
Not specified	1,100	2,200	N/A
Start/Stop	1,050	700	700
Phone Transfer	600	1,000	1,000

The Department notes that MP did not report 'Not Specified' as a tracked subject matter metric in 2022.

The information in Table 18 demonstrates Minnesota Power is seeing significant increases in customers using its internet-based communication channels, with the exception of Facebook and Instagram which saw precipitous drops in customer engagement in 2022. The information in Table 19 demonstrates something similar in aggregate. The Department views these increased levels of interaction as a positive, and asks for further information from the Company in reply comments regarding its plan to drive more traffic to Facebook and Instagram or the threshold of participation at which it will no longer pursue these platforms.

b) Revised Customer Complaint Categories

MP provided a synopsis of the 2021 Complaint Category Working Session convened by Commission staff and attended by the Consumer Affairs Office, Department of Commerce, Xcel Energy, Minnesota Power, and Otter Tail Power in Section XII of its 2022 SRSQ Report beginning on page 108. The Company explained that parties had agreed to including additional details in future reporting by expanding the "Inadequate Service" category to include four sub-categories: Field/Operations, Customer Service, Programs and Services, and Cold Weather Rule Protection. MP intends to begin reporting compliant with these new requirements in its 2023 SRSQ Report to be filed in April of 2024.

The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission's December 10, 2020 Order in Docket No. E015/M-20-404.

4. 2021 Annual SRSQ Filing – December 2, 2021, Order

The Commission's December 2021 Order Points 14 and 16 in Docket No. E015/M-21-230 require utilities to include the following in its service quality report:

5) Electronic utility-customer interaction beginning with the reports filed in April 2023;
6) Percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based services.
7) To continue to provide information on electronic utility-customer interaction such that baseline data are collected:
    a) Yearly total number of website visits;
    b) Yearly total number of logins via electronic customer communication platforms;
    c) Yearly total number of emails or other customer service electronic communications received; and
    d) Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700.
    e) Public facing summaries with their annual Safety, Reliability, and Service Quality reports.

a) *Specific Percentage Uptime and Error Rater Percentage Information*

Minnesota Power provided the uptime metrics for its website, outage reporting, outage map, Speedpay, and MyAccount, reproduced here in Table 25.

Table 25: Percentage Uptime

Percentage Uptime	
General Website	99.98%
Speedpay.com	99.94%
MyAccount	99.99%
Outage Reporting Form	100%
Outage Map	100%

b) *Percentage Uptime and Error Rate Percentage Base Data Collection*

Minnesota Power is committed to providing the Commission this information over the next three annual SRSQ reporting cycles.

c) *Continue to Provide Electronic Customer Information*

See pages 70-75 of the Annual Report and pages 29 and 30 of these comments.

d) *File Public Facing Summaries with the Annual SRSQ Report*

MP provided this information on pages 14 and 15 of its Annual Report.

The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission's December 2, 2021, Order in Docket No. E015/M-21-230.

5. 2021 Annual SRSQ Filing – March 2, 2022, Order

The Commission's March 2022 Order in Docket No. E015/M-21-230 requires Minnesota Power to include the following in its Annual Report at Order Points 2, 3, and 4.

2. The Commission sets Minnesota Power's 2021 statewide reliability standard at the IEEE benchmarking second quartile for medium utilities and set work center reliability standards at the IEEE benchmarking second quartile for small utilities.
3. Minnesota Power must file a supplemental filing to its 2021 safety, service quality, and reliability report 30 days after the IEEE publishes the 2021 benchmarking results. The supplemental filing must include an explanation for any standards the utility did not meet.
4. The Commission will establish three work centers for Minnesota Power, as described on pages 25-26 of the Company's 2020 Report.

The Department verifies Minnesota Power complied with Order Points 2 and 4 in its 2022 Annual Report. The requirement in Order Point 3 is prospective and the Company committed to provide that information as well.

The Department concludes Minnesota Power appears to have fulfilled the requirements of the Commission's March 2, 2022 Order in Docket No. E015/M-21-230 to the extent possible.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department:

- Recommends the Commission **accept** Minnesota Power's Annual Safety Report.

- Requests MP provide the following in reply comments:
    - Further information explaining the Days of Job Transfer or Restriction for 2022 being approximately 15 percent above the ten-year average.
    - Information regarding what safety awareness campaigns and/or trainings it has or intends to implement to mitigate incidents of vehicle damage.
    - Monthly data on its call center response time goals through the first half of 2023 in reply comments supporting its claim of continuing improvement
    - Its plan to drive more traffic to Facebook and Instagram, or the threshold of participation at which it will no longer pursue these platforms.

- Will make final recommendations on the Company's Annual Service Quality Report after reviewing its reply comments.

- Will provide a recommendation on the Company's Annual Service Reliability Report after reviewing the Company's future supplemental filing on Institute of Electrical and Electronics Engineers benchmarking data for 2022.

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-23-75 ☐Nonpublic ☒Public
Requested From: Claire Vatalaro, Minnesota Power Date of Request: 5/18/2023
Type of Inquiry: Financial Response Due: 5/30/2023

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Chris Watkins
Email Address(es): christopher.watkins@state.mn.us
Phone Number(s): 651.539.1817

ADDITIONAL INSTRUCTIONS:
Each response must be submitted as a text searchable PDF, unless otherwise directed. Please include the docket number, request number, and respondent name and title on the answers. If your response contains Trade Secret data, please include a public copy.

Request Number:	**10**
Topic:	Asset management preventative maintenance program
Reference(s):	Page 52

Request:

Please provide a detailed narrative of the information and criteria used to determine and document equipment condition, establish trends and expected failure assumptions, and prioritize projects for inclusion in the Company asset management and replacement plan for:

1. Poles, crossarms, insulators, and conductors
2. Switches, cutouts, and reclosers
3. Substation equipment
4. Underground conductors

Response:

1. Poles are inspected every ten years through the Company's contracted groundline inspection program. As issues are found, the pole is either trussed, treated, or replaced. All other pole hardware such as crossarms, insulators, and conductors are inspected through Minnesota Power's internal inspection program where line operations and asset coordinators can enter Service Requests through an App as issues are identified in the field.

2. Minnesota Power has completed audits of all distribution assets including switches, reclosers, voltage regulators and capacitor banks across our service territory. The audits were conducted using ESRI's Collector and Survey123 Applications. Asset Coordinators used the applications to gather location data,

To be completed by responder

Response Date: 5/30/2023
Response by: Hannah Freeman – Supervisor, Distribution Asset Management
Email Address: hfreeman@mnpower.com
Phone Number: 218-471-4008

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-23-75 ☐Nonpublic ☒Public
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equipment specifications, asset tags and pictures. Once the equipment audit was complete, the information was uploaded/updated into the asset management system MAXIMO. Preventative Maintenance (PM) activities were created for the Company's operations departments to complete.

The PM frequency was determined based on type of equipment and manufacturer recommendation. Areas known to have reliability issues were prioritized to have PM activities completed first. Switch PMs are on a 3-year frequency cycle, in which the Company is in its 2nd complete year. Switches identified during the PM activities as inoperable have been replaced or removed from the system. Hydraulic Recloser PM Frequency is 7 years. The Company is currently completing its 2nd year of this cycle. As hydraulic reclosers near their end of life they are replaced with items that require less maintenance such as Trip Savers or electronic, solid dielectric reclosers. Electronic Recloser PM frequency is 2 years, in which the Company is currently completing its 2nd year of this cycle. The devices that have batteries receive a new set every other year.

Voltage regulator and capacitor bank audits have been completed and those records are uploaded into Maximo. Minnesota Power is currently determining the frequency of the PM activities along with the maintenance criteria of which maintenance will be pushed out later this year.

3. Monthly onsite rounds are used to visually inspect substation equipment, the substation site, and take equipment readings. The types and frequencies of Preventative Maintenance (PM) and testing depend on the type of equipment and is based on manufacturer recommendations, relevant standards, and industry best practices. Data is recorded during inspections, testing and PM activities to monitor and trend equipment condition. If issues are identified a service request is entered via Survey123 and directed to the appropriate department to review the reported issue and determine if the equipment can be repaired or if it requires replacement. The data from inspections, PMs, equipment tests along with reported issues are used to prioritize replacement of equipment. In addition to this data, manufacturer and industry information on equipment life expectancy is also used to prioritize equipment in the asset management and replacement plan.

To be completed by responder

Response Date: 5/30/2023
Response by: Hannah Freeman – Supervisor, Distribution Asset Management
Email Address: hfreeman@mnpower.com
Phone Number: 218-471-4008

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85 7th Place East | Suite 280 | St. Paul, MN 55101
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4. Underground conductors currently do not go through an inspection cycle, though the equipment that is connected to the conductors are inspected every ten years through the contracted groundline inspection program. If issues are found, they are dealt with as soon as possible. The Company also tracks cable failures throughout its service territory. If a section of cable has failed more than 3 times, it is identified for replacement. Minnesota Power also prioritizes unjacketed cable for replacement as it is identified in the field. All lead-covered cable has now been replaced and is no longer in service.

To be completed by responder

Response Date: 5/30/2023
Response by: Hannah Freeman – Supervisor, Distribution Asset Management
Email Address: hfreeman@mnpower.com
Phone Number: 218-471-4008

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Request Number:	**11**
Topic:	Bulk Power Supply Interruptions
Reference(s):	Table 11, page 52

Request:
Please identify the underground equipment that failed on the 198 Line on August 10, 2022.

Response:

There was a 12-minute outage on 198 Line to isolate the voltage regulator failure at the new Hinckley West substation, with the final restoration of all stepdown substations fed from 198 line at 21 minutes. This regulator is padmounted and the failed elbow is considered underground equipment.

Request:

In response to the Minn. Rule 7826.0500, subpart 1(F) requirement that the Company provide information regarding "any remedial steps that have been taken or will be taken to prevent future interruption" for interruptions to bulk power supply facilities provided in Table 11 MP referred to the major service interruptions reports contained in Appendix A. For each of the outage reports in Appendix A the "Follow Up" section is blank, and the following outages listed in Table 11 are not documented in Appendix A:

- July 10, 2022 outage on 198 Line (Bear Creek)
- August 10, 2022 outage on 198 Line (Bear Creek)
- December 14, 2022 outage on 198 Line (Bear Creek)
- December 19, 2022 outage on 198 Line (Bear Creek)
- May 26, 2022 outage on 23 Line (Bear Creek)

To be completed by responder

Response Date: 5/30/2023
Response by: Lee Gustafson – Reliability Engineer
Email Address: lgustafson@mnpower.com
Phone Number: 218-355-2399

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-23-75 ☐Nonpublic ☒Public
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- December 14, 2022 outage on 23 Line (Bear Creek)
- December 15, 2022 outages on 23 Line (Bear Creek)
- December 21, 2022 outage on 23 Line (Bear Creek)
- December 14, 2022 outage on 23 Line (Thompson)
- June 25, 2022 outages on 32 Line (Tower-Winton) and 33 Line (Winton), unclear if included in the 34kV feeder lock-out affecting AKY-543 and BLS-509.
- July 10, 2022 outage on 59 Line (Mahtowa-Sandstone)
- December 14 and 15, 2022 outages (5) on 59 Line (Mahtowa-Sandstone), unclear if included in December 14-18 Storm reporting for the Central Area.

Please provide outage reports for all BPS facility outages listed in Table 11 and include the remedial actions have been or will be taken to prevent future interruption.

Response:

The reference to Appendix A and the included outage reports was a carryover item from previous years' Safety Reliability and Service Quality filings. Although Appendix A page 9, 27, 28 and 29 include some of these bulk supply power outages, the Minnesota Public Utilities Commission major services interruption reports are intended for different reporting criteria (Feeder breaker lockout for over an hour affecting over 500 customers.) Not all of the bulk power supply outages mentioned above met this criteria.

Nearly all the Bulk Power Supply Interruptions were caused by severe weather. After each storm, fallen trees were removed and line repairs were made. For a week after the December 14-15, 2022 storm, additional clearing was performed to clear many trees that were snow loaded and leaning into the right of way. Eleven of the nineteen outages listed in Table 11 were a part of a major event exclusion for those dates. The five outages on 59 Line (Mahtowa-Sandstone) were all related to the December storm and are mentioned in Appendix A, pages 27 and 28,

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To be completed by responder

Response Date: 5/30/2023
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Email Address: lgustafson@mnpower.com
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under the abbreviation MAT-59. 32 Line and 33 Line are located in the northern service territory and not related to AKY-543 and BLS-509 outages which occurred in our western service territory, there was a large storm that rolled through our entire service territory affecting many feeders over those two days. Remedial steps for each of the bulk power supplies are listed below by feeder.

198 Line (Bear Creek)

- Vegetation maintenance is scheduled to be completed in 2023.
- A new switch is being added to 198 Line near the new Hinckley West substation.

23 Line (Bear Creek) & (Thomson)

- Vegetation maintenance was recently completed for 23 Line.
- A recloser is in process of being added to 23 Line. This recloser will sectionalize a heavily forested section of the line to aid in reliability.
- Initial plans are being discussed for a battery storage pilot for the communities fed off of this feeder.

32 Line (Tower-Winton)

- Vegetation maintenance is scheduled to be completed in 2023.
- 32 Line rebuild and upgrade is planned for 2031.

33 Line (Winton)

- Vegetation maintenance was completed in 2022.
- Rebuild and reconductoring of 33 Line is in design and is expected to start construction in 2024.

59 Line (Mahtowa-Sandstone)

- Vegetation maintenance was completed 2-3 years ago on 59 Line.
- The process of rebuilding and upgrading 59 Line is in progress and is expected to be completed in 2026.
- Adding motor operators with remote control capabilities to existing switches is being completed in 2023.

To be completed by responder

Response Date: 5/30/2023
Response by: Lee Gustafson – Reliability Engineer
Email Address: lgustafson@mnpower.com
Phone Number: 218-355-2399

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- The Company is also planning to add a distribution tie between communities fed off 23 Line and 59 Line.

To be completed by responder

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Phone Number: 218-355-2399

Minnesota Department of Commerce
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Request Number:	**14**
Topic:	Call center response time
Reference(s):	Page 95

Request:

A. Regarding efforts to improve call center staffing and efficiency, please provide the following:
   1. The data used and analysis conducted by MP to complete the peer benchmarking effort that led the Company to believe that it is offering a competitive wage for the Call Center role.
   2. For each month in 2022, the total number of employee hours spent performing call center duties broken down to FTE and PTE aggregate values for each month.
   3. Data supporting MP's claim that 2023 call center performance is continuing to improve and is off to a promising start, please provide this information in a format similar to Table 41 on page 98 of the filing.
   4. Any learnings from the company obtained via exit interviews from call center employees – if conducted – that informed MP's efforts to attract and retain employees.

B. Has MP conducted any analysis of the impacts of ending work from home for call center employees on recruiting or retaining employees, or how having workers in the office affected absences from COVID-related illness?

Response:

A. Importantly, the Customer Care and Support Representatives in the Call Center are part of the Collective Bargaining Agreement ("CBA") with Minnesota Power covering employees represented by the International Brotherhood of Electrical Workers Local Number 31 ("IBEW Local 31"). As such, their wage and benefits are negotiated. That said, Minnesota Power has conducted informal peer benchmarking and found that

To be completed by responder

Response Date: 05/30/2023
Response by: Tina S. Koecher – Director - Customer Experience Operations
Email Address: tkoecher@mnpower.com
Phone Number: 218-355-3805

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
Information Request

Docket Number: E015/M-23-75 ☐Nonpublic ☒Public
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Type of Inquiry: Financial Response Due: 5/30/2023

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Assigned Analyst(s): Chris Watkins
Email Address(es): christopher.watkins@state.mn.us
Phone Number(s): 651.539.1817

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Call Center wages for other investor-owned utilities in Minnesota and across the country generally range from $14 per hour to $25 per hour. The utilities informally polled were generally electric only, though some were both electric and gas. Call Center representative job responsibilities range by utility from specialized (skills or topic-based routing) to universal (general call routing). Given its size in terms of customer count and the relative size of the Call Center, Minnesota Power has universal agents. With a current starting wage of $23.17 per hour and a six-month progression rate of $25.74 per hour, the wage is clearly competitive.

Please refer to Attachment A for item 2. Please refer to Attachment B for item 3.

As referenced in the filing, Call Center representatives primarily left their roles for other internal opportunities. This is "good attrition" in the sense that the Company is retaining this talent and the Call Center has long-been an excellent entry point for a career at Minnesota Power. The Company does not conduct exit interviews in these scenarios. For the few who left for external opportunities, the Company does provide the opportunity for employees to provide information in an exit interview. It is not mandatory for employees to partake in an exit interview and therefore feedback in this format is inconsistently received. In consulting with Human Resources, it has been quite some time since the Call Center has received feedback from an exit interview that would point to any enhancements that could be made on the attraction and retention of Call Center employees.

B. Minnesota Power continuously monitors its recruitment and retention realities overall, and the Customer Experience team works closely with Human Resources to adapt posting tactics to ensure a strong pool of candidates is identified when positions need to be filled. Thus far, the Company has been able to fill open positions. Through the interview process, the majority of incoming candidates have shared that they actually prefer an office setting, so this does not appear to be a barrier to recruitment and retention up to this point. Further, many of the internal positions Call Center representatives have left for are either fully in office or hybrid. Additionally, through mutual agreement with Local 31, the Company does offer work from home as an option under three scenarios for the Call Center – outages, inclement weather, and for

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To be completed by responder

Response Date: 05/30/2023
Response by: Tina S. Koecher – Director - Customer Experience Operations
Email Address: tkoecher@mnpower.com
Phone Number: 218-355-3805

Minnesota Department of Commerce
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quarantine purposes. This helps to balance responsiveness with the Company's strong safety value. It has also helped to limit the impact of COVID-19 related absences, while offering employees the flexibility to continue to work, if they are physically able to do so.

To be completed by responder

Response Date: 05/30/2023
Response by: Tina S. Koecher – Director - Customer Experience Operations
Email Address: tkoecher@mnpower.com
Phone Number: 218-355-3805

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-23-75

Dated this **16th** day of **June 2023**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	Brodin	mbrodin@allete.com	Minnesota Power Company	30 West Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-75_M-23-75
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-75_M-23-75
MP Regulatory	Compliance	MPRegulatoryCompliance@mnpower.com	Minnesota Power	30 W Superior St. Duluth, MN 55802	Electronic Service	No	OFF_SL_23-75_M-23-75
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_23-75_M-23-75
Discovery	Manager	discoverymanager@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-75_M-23-75
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_23-75_M-23-75
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-75_M-23-75
Claire	Vatalaro	cvatalaro@allete.com	Allete	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_23-75_M-23-75