



AN ALLETE COMPANY

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July 22, 2024

**VIA E-FILING**

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

**Re:** In the Matter of Minnesota Power Annual Safety, Reliability,  
and Service Quality Metrics for 2023  
**Docket No. E015/M-24-29**  
**Reply Comments**

Dear Mr. Seuffert:

Minnesota Power (or the "Company") submits these Reply Comments in response to Initial Comments filed by the Department of Commerce, Division of Energy Resources ("Department") on June 28, 2024 in the above referenced matter.

Minnesota Power appreciates the Department's thorough review of the Company's 2023 SRSQ Report, and the opportunity to provide the additional information requested by the Department. If you have any questions regarding this filing, please contact me at (218) 355-3082 or [cvatalaro@allete.com](mailto:cvatalaro@allete.com).

Yours truly,

*Claire Vatalaro*

Claire Rajala Vatalaro  
*Regulatory Compliance Specialist*

CMRV:th  
Attach.

I AM  
**ZERO INJURY.**

*Together we choose to work safely for our families, each other, and the public.  
We commit to be injury-free through continuous learning and improvement.*

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

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In the Matter of Minnesota Power's Annual Safety,  
Reliability, Service Quality Metrics for 2023

Docket No. E015/M-24-29  
**Reply Comments**

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**I. INTRODUCTION**

Minnesota Power (or the “Company”) submits these Reply Comments in response to Initial Comments filed by the Department of Commerce, Division of Energy Resources (“Department”) on June 28, 2024, in the above-referenced Docket. On April 1, 2024, Minnesota Power submitted its Annual Safety, Reliability, and Service Quality Metrics Report for 2023 (“2023 SRSQ Report”) to the Minnesota Public Utilities Commission (“Commission”). The Department recommended to accept the Safety portion of Minnesota Power’s 2023 SRSQ Report and will make final recommendations on the Company’s 2023 Service Quality Report after reviewing its Reply Comments. Additionally, in the following section, the Company provides the requested information.

**II. RESPONSE TO DEPARTMENT COMMENTS**

1. **Provide an explanation for the degradation in ETR accuracy (both initial and final) that was seen in 2023 and describe any changes in tracking restoration time accuracy.**

The Company discovered that the data used for the Estimated Time of Restoration (“ETR”) calculations was not always accurate due to the aging Outage Management System (“OMS”). The new OMS will be in service in late 2024 and will provide better and more accurate information.

2. **Provide the error rate percentage for payment services, including a break down for unexpected errors, errors outside of the customer’s control and/or meaningful categorization, if available.**

As this is not standard reporting the Company had established through its payment vendor, this information was requested. Please note, Minnesota Power's payment vendor does not capture and store data on attempted and failed payments that occur during or due to payment system (Speedpay) outages; however, as reported in the SRSQ (Table 32, page 70), uptime across channels was 99.95% to 99.97% in 2023. The "failed" payments that are tracked through the Company's payment vendor are actual attempts that make it to the application and then fail for some reason, typically bad card info, non-sufficient funds (NSF), expired card, invalid/closed account, etc. For Automated Clearing House (ACH) payments, payment returns primarily fall into three general categories – Unauthorized Returns, Administrative Returns, and NSF Returns. As such, the reported information shows total returns, as well as a breakdown of returns that fall into these three general categories. For credit cards, approval and decline rates are reported. Please refer to Attachment A for this summary information on payment error rates and categorization.

**3. Requests Minnesota Power add work center as a data point to the Distribution System Outage Notifications (included as Appendix A of the 2023 Annual Report) in future SRSQ reports.**

The Company will provide this additional requested information in future Safety, Reliability and Service Quality Reports.

**4. Regarding the Remote-Reconnect Pilot Program, provide the overall average time to reconnect using the remote-reconnect program compared to the standard reconnection process, as required in the December 9, 2020 Order in Docket No. E015/M-19-766.**

The Below table provides the overall average time to reconnect using the remote-reconnect program compared to the standard reconnection process in the format of DD/HH/MM/SS (Days, Hours, Minutes, Seconds):

Average Time to Reconnect from Disconnect	Standard	Remote
LIHEAP Customers	5 Days, 4:34:44	3 Days, 7:21:56
Self-Declare Customers	5 Days, 5:15:35	4 Days, 1:14:57
Standard Customers	22 Days, 6:6:31	9 Days, 3:52:29
All Customers	17 Days, 12:48:44	6 Days, 22:23:8
Average Time to Reconnect from Request	Standard	Remote
LIHEAP Customers	0 Days, 4:13:56	0 Days, 0:0:53
Self-Declare Customers	0 Days, 2:59:3	0 Days, 0:0:51
Standard Customers	0 Days, 11:54:0	0 Days, 0:9:57
All Customers	0 Days, 9:44:40	0 Days, 0:6:28

The Company will provide this information in this format in future Safety, Reliability and Service Quality Reports.

**5. Requests that in its compliance filing, once the Institute of Electrical and Electronic Engineers (IEEE) Benchmark Year 2024 Results for 2023 Data are published, MP include second quartile reliability standards for both medium and small utilities.**

The Company will provide this additional requested information in future Safety, Reliability and Service Quality Reports.

**III. CONCLUSION**

Minnesota Power appreciates the opportunity to address the Department’s requests in this matter, and remains committed to providing safe, reliable and affordable electric service to its unique customer base in northeastern and central Minnesota. Please contact me at (218) 355-3082 or cvatalaro@allete.com if you have any questions regarding this filing.

Dated: July 22, 2024

Respectfully Submitted,

*Claire Vatalaro*

Claire Rajala Vatalaro  
*Regulatory Compliance Specialist*

**Credit Card Transactions**

Date	Submitted	Approved	Declined	Approval Rate	Decline Rate
Jan-23	21,160	20,217	943	95.543%	4.457%
Feb-23	21,626	20,645	981	95.464%	4.536%
Mar-23	21,610	20,743	867	95.988%	4.012%
Apr-23	20,099	19,259	840	95.821%	4.179%
May-23	20,827	19,963	864	95.852%	4.148%
Jun-23	19,650	18,856	794	95.959%	4.041%
Jul-23	19,582	18,744	838	95.721%	4.279%
Aug-23	20,442	19,467	975	95.230%	4.770%
Sep-23	21,020	20,073	947	95.495%	4.505%
Oct-23	20,700	19,811	889	95.705%	4.295%
Nov-23	19,922	19,059	863	95.668%	4.332%
Dec-23	19,033	18,170	863	95.466%	4.534%

**Automated Clearing House (ACH)**

Date	Total ACH Payments	Total Returns	Unauthorized Returns (5,7,10,29,51)	Unauthorized Return %	Administrative Returns (2,3,4)	Administrative Return %	NSF Returns (1,9)	NSF Return %
Jan-23	41,405	250	0	0.00%	86	0.21%	156	0.38%
Feb-23	40,499	225	3	0.01%	70	0.17%	140	0.35%
Mar-23	41,571	259	3	0.01%	75	0.18%	150	0.36%
Apr-23	38,681	249	2	0.01%	81	0.21%	154	0.40%
May-23	43,364	227	4	0.01%	62	0.14%	154	0.36%
Jun-23	40,273	290	4	0.01%	87	0.22%	185	0.46%
Jul-23	41,179	263	4	0.01%	80	0.19%	169	0.41%
Aug-23	41,762	304	2	0.00%	100	0.24%	189	0.45%
Sep-23	40,155	290	3	0.01%	101	0.25%	169	0.42%
Oct-23	44,413	294	1	0.00%	99	0.22%	183	0.41%
Nov-23	40,730	244	1	0.00%	84	0.21%	153	0.38%
Dec-23	40,022	270	3	0.01%	89	0.22%	165	0.41%

- 1 Insufficient Funds
- 2 Account Closed
- 3 No Account/Unable to Locate Account
- 4 Invalid Account Number Structure Unauthorized
- 5 Unauthorized Consumer Debit using Corporate SEC Code
- 7 Customer Revoked Authorization
- 9 Uncollected Funds
- 10 Originator not known and/or not authorized to Debit Receiver's Account
- 29 Not Authorized by Corporate Customer
- 51 Ineligible / Improper Item Related to RCK

**Overall %**

0.60%  
0.56%  
0.62%  
0.64%  
0.52%  
0.72%  
0.64%  
0.73%  
0.72%  
0.66%  
0.60%  
0.67%

STATE OF MINNESOTA    )  
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COUNTY OF ST. LOUIS    )

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 22<sup>nd</sup> day of July, 2024, she served Minnesota Power’s Reply Comments in **Docket No. E015/M-24-29** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket’s Official Service List for this Docket were served as requested.



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Tiana Heger