

June 24, 2025

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

RE: Comments of the Minnesota Department of Commerce
Docket No. E015/M-11-409

Dear Mr. Seuffert:

On March 3, 2025, Minnesota Power (MP or the Company) filed its Thirteenth Annual Report on the Rider for Customer Affordability of Residential Electricity (CARE) Discount Program.¹ On March 20, 2025, the Commission issued a Notice of Comment Period asking commenters whether the Commission should accept MP's Annual Report, approve changes to MP's Affordability Surcharge, and to review other issues within the report.²

On April 16, 2025, the Minnesota Department of Commerce (Department) filed Comments recommending the Minnesota Public Utilities Commission (Commission) accept MP's Report and requested additional information and analysis by the Company in Reply Comments before making final recommendations.³

On April 17, 2025, the Citizens Utility Board of Minnesota (CUB) and the Legal Services Advocacy Project (LSAP) jointly submitted Comments recommending MP convene a stakeholder process to explore increasing enrolment and modifying the CARE program.⁴

¹ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Compliance Filing – Annual Report, Minnesota Power, March 3, 2025, Docket No. E015/M-11-409, (eDockets) [20253-215957-01](#).

² *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Notice of Comment Period, Minnesota Public Utilities Commission, March 20, 2025, Docket No. E015/M-11-409, (eDockets) [20253-216633-01](#).

³ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Minnesota Department of Commerce, Comments, April 16, 2025, Docket No. E015/M-11-409, (eDockets) [20254-217804-01](#).

⁴ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Citizens Utility Board of Minnesota and Legal Services Advocacy Project, Comments, April 17, 2025, Docket No. E015/M-11-409, (eDockets) [20254-217848-01](#).

On April 30, 2025, the Company filed Reply Comments addressing questions posed by the Department, in addition to the Comments submitted jointly by the CUB and LSAP.⁵

On April 30, 2025, Energy Cents Coalition filed Comments supporting CUB and LSAP's suggestion to approve the surcharge while also convening a stakeholder group.⁶

On June 17, 2025, the Commission Staff issued its Briefing Papers related to the instant docket, summarizing the Comments issued by the parties and providing a series of decision options.⁷

The Department apologizes for not submitting Response Comments to the Company's Reply Comments to clarify the Department's positions on the items addressed by the Company.

In response to the proposed Decision Options issued by Commission Staff, the Department supports all (decision options 1 through 7, including all of 4.a. through 4.d.) as follows:

1. Accept Minnesota Power's Annual 2024 CARE Program Report.
2. Approve Minnesota Power's proposal to reduce its Affordability Surcharge as detailed in Attachment B of its March 3, 2025 Report.
3. Accept Minnesota Power's proposed Low-Income Affordability Program Surcharge tariff language as detailed in Attachment C in its of its March 3, 2025 Report.
4. Require Minnesota Power to convene a stakeholder process that addresses the following issues:
 - a. Determine a new, higher budget threshold that will allow the percentage-of-income affordability discount to be reopened to new participants with the goal of implementing changes at the start of the next program year (October 1, 2025)
 - b. Determine the associated customer surcharge required to support this budget.
 - c. Consider improvements to communications and outreach strategies to inform customers of programmatic revisions and raise awareness of assistance resources.
 - d. Consider what, if any, changes to reporting are warranted.
5. Require Minnesota Power to file a report and recommendation in this docket detailing the outcome of the stakeholder process by August 1, 2025, or a later date agreed to by the parties.

⁵ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Reply Comments, Minnesota Power, April 30, 2025, Docket No. E015/M-11-409, (eDockets) [20255-218453-01](#).

⁶ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Energy Cents Coalition, Comments, April 30, 2025, Docket No. E015/M-11-409, (eDockets) [20254-218400-01](#).

⁷ *In the Matter of Minnesota Power's Petition for Approval of a Pilot Rider for Customer Affordability of Residential Electricity*, Notice of Commission Meeting, Minnesota Public Utilities Commission, June 17, 2025, Docket No. E015/M-11-409, (eDockets) [20256-219828-01](#). Briefing Papers found at "Details 2022-274," "7. Briefing Papers"

Will Seuffert

Date: June 24, 2025

Page 3

Delegate authority to the Executive Secretary to approve the filing if no party or participant files an objection within 30 days of the Company's filing. If a party or participant files an objection within 30 days, the Executive Secretary will issue a notice of comment period on the disputed issues.

6. In the event the low-income home energy assistance program ("LIHEAP") funding is discontinued by the federal government, require Minnesota Power to continue to provide CARE funding to ratepayers who have received energy assistance from LIHEAP any time in federal fiscal year 2024. If this provision is triggered, Minnesota Power shall file an update related to CARE funding in this docket by October 1, 2025.
7. Require Minnesota Power to file 5-year summary data with the annual CARE reports in an .xlsx format.

If approved by the Commission, the Department plans to participate in the stakeholder process and is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB

Assistant Commissioner of Regulatory Analysis

AG/ad

Attachment

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-11-409

Dated this **25th** day of **June 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	11-409Official
2	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	11-409Official
3	Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	11-409Official
4	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	11-409Official
5	Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	11-409Official
6	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	11-409Official
7	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	11-409Official
8	Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE		2110 W. 1st Street Duluth MN, 55806 United States	Electronic Service		No	11-409Official
9	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	11-409Official
10	George	Shardlow	george@energycents.org	Energy CENTS Coalition		823 E. 7th Street Saint Paul MN, 55106 United States	Electronic Service		No	11-409Official