COMMERCE DEPARTMENT

July 11, 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-25-29

Dear Mr. Seuffert:

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

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

The Report was filed by Minnesota Power (MP or the Company) on April 1, 2025.

The Department:

- Recommends the Commission **accept** Minnesota Power's 2024 Safety Report.
- Recommends the Commission **accept** Minnesota Power's 2024 Service Quality Report pending receipt of requested detail in its Supplemental Filing:
  - Explain the difference between its forecast and actual 2024 remote-reconnect program costs, as noted in section F.2.
  - Provide the missing payment services error rate percentage as noted in section F.4.1.
- Will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that MP will file later in 2025.
- Recommends setting the benchmarking of MP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data.

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

Sincerely,

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

MBK/ad
Attachment

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Acronyms and Abbreviations

AMI	Advanced Metering Infrastructure
AMR	Automated Meter Reading
ANSI	American National Standards Institute
ASAI	Average Service Availability Index
CAIDI	Customer Average Interruption Duration Index
CAO	Consumer Affairs Office (of the Public Utilities Commission)
CELI	Customers Experiencing Lengthy Interruptions
CEMI	Customers Experiencing Multiple Interruptions
CMI	Customer Minutes of Interruption
CWR	Cold Weather Rule
Department	Department of Commerce, Division of Energy Resources
DSM	Demand-Side Management
EEI	Edison Electric Institute
EIA	U.S. Energy Information Administration
ETR	Estimated Time of Restoration
EVSE	Electric Vehicle Supply Equipment (Report p. 24)
FLISR	Fault Location Isolation and Service Restoration
GIS	Geographic Information System
Grid Mod	Grid Modernization
IDP	Integrated Distribution Plan
IEEE	Institute of Electric and Electronics Engineers
IVR	Interactive Voice Response
kW	Kilowatt
kWh	Kilowatt-Hour
LIHEAP	Lower-income home energy assistance program
MAIFI	Momentary Average Interruption Frequency Index
MP	Minnesota Power
OMS	Outage Management System
OSHA	United States Occupational Safety and Health Administration
OSHD	Occupational Safety and Health Division of Minnesota Department of Labor and Industry
PM	Preventative Maintenance (Report p. 19)
PUC	Public Utilities Commission
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SRSQ	Safety, Reliability, and Service Quality

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E015/M-25-29

I. INTRODUCTION

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

II. PROCEDURAL BACKGROUND

April 1, 2025	MP filed its 2024 SRSQ Report.
April 30, 2025	The Commission issued a notice of comment period for the Report.

Topics open for comment that are relevant to MP:

- Should the Commission accept the Electric Utilities' 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?
- Should the Commission accept Minnesota Power's 5-year rolling average reliability standard alternative? If not, should the Commission consider a transition to an alternative approach in the reliability standards for Minnesota Power based on the utility's discussion of Institute of Electrical and Electronic Engineers (IEEE) reporting issues and U.S. Energy Information Administration (EIA) 861 data?
- Are there other issues or concerns related to this matter?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.[1]

[1] Commission's Notice of Comment Period, April 30, 2025, (eDockets: 20254-218387-01) (hereinafter "Commission's notice").

III. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The 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 the Department's review of MP's 2024 Safety, Reliability, and Service Quality Reports;
- A discussion of the Company's reliability standards for 2025; and
- A discussion of the Company's compliance with other Commission Orders.

A. RESPONSE TO NOTICE TOPICS

1. *Should the Commission accept MP 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?*

The Department recommends that the Commission accept MP's 2024 Safety and Service Quality Report, pending the additional detail requested from MP in its supplemental filing.

MP will be supplementing its report in the fall of 2025with the results of IEEE's 2024 performance year benchmarking results.[2] The Department plans to file supplemental comments regarding its review of that information after the supplemental filing is received and will provide a recommendation on the Reliability Report at that time.

2. *Should the Commission accept Minnesota Power's 5-year rolling average reliability standard alternative? If not, should the Commission consider a transition to an alternative approach in the reliability standards for Minnesota Power based on the utility's discussion of IEEE reporting issues and EIA 861 data?*

The Department recommends benchmarking MP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data. The Department includes a more detailed discussion of its analysis and recommendations in section D, below.

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

The Department does not have any additional concerns at this time.

[2] Report at 48.

B. ANNUAL SAFETY REPORT

The annual safety report consists of two parts in accordance with Minnesota Rules 7826.0400:

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.

B.1. Department Review

The following tables are a compilation of MP's summaries of the reported the Company filed with OSHA and OSHD for the last ten years.

Table 1: Case Data from Reports filed with OSHA and OSHD (2014 – 2024) [3]

Year	Deaths	Cases with Days Away from Work	Cases with Job Transfer/ Restriction	Other Recordable Cases	Days of Job Transfer/ Restriction	Days Away from Work
2014	0	3	8	10	267	26
2015	0	5	4	8	115	26
2016	0	8	5	15	171	107
2017	0	10	6	15	629	139
2018	0	1	3	14	87	2
2019	0	3	4	12	319	95
2020	0	5	11	13	762	102
2021	1	6	1	10	259	287
2022	0	5	9	10	369	51
2023	0	4	10	12	687	91
10-Year Average	**0.1**	**5.0**	**6.1**	**11.9**	**366.5**	**92.6**
2024	0	8	4	7	621	114

Source: Minnesota Department of Commerce

There was an increase in the number of cases in 2024 compared to the recent ten-year average, and the resulting number of days of job transfer or restriction per case also increased in 2024. MP explained that one employee's injury was a re-aggravation of a long-standing medical condition which required surgery and a long recovery period and accounted for over 60% of the lost time experienced in 2024.[4]

[3] Report at Table 7, page 42.
[4] Department Attachment 1, MP Supplemental Response to Department Information Request (IR) No. 4.

MP reported 18 injuries and 1 skin disorder injury in 2024.[5] Both of these figures represent a decrease from 2023 (22 and 3 respectively).

Table 2 summarizes MP's most recent and past reports' information regarding property damage claims that occurred as a result of downed wires or other electrical system failures.

Table 2: Property Damage Claims (2014 – 2024) [6]

Year	Claims	Total Amount Paid
2014	23	$26,939
2015	29	$76,376
2016	16	$15,466
2017	4	$4,364
2018	10	$22,374
2019	13	$111,048
2020	13	$40,594
2021	16	$67,487
2022	20	$120,097
2023	17	$35,323
10-Year Average	**16.1**	**$52,007**
2024	19	$51,455

Source: Minnesota Department of Commerce

MP's 2024 annual expense for property damage claims was up in 2024 compared to 2023 but was slightly below the ten-year average. Approximately 49% of the value of 2024 claims were for crop damage. MP explained that these claims were the result of necessary repairs from a weather event of MP's direct current transmission line structures in North Dakota and Minnesota and were unavoidable due to the location of the structures.[7]

The Department acknowledges MP's fulfillment of the annual safety report requirements of Minnesota Rules 7826.0400.

B.2. Department Recommendation

The Department recommends that the Commission accept MP's annual safety report.

C. ANNUAL RELIABILITY REPORT

Minnesota Rules 7826.0500 through 7826.0700 describe the:

- Reliability reporting requirements;

[5] Report at Table 7, page 42.
[6] Report at Table 8, pages 43-44.
[7] Department Attachment 2, MP Response to Department IR No. 5.

- Reliability standards; and
- Reporting requirements for major service interruptions.

The Department provides a summary and analysis of the reliability reporting requirements from statute and additional information as required by Commission Orders below.

C.1. Reliability Performance

In accordance with Minnesota Rules 7826.0500, MP reports the utility's SAIDI, SAIFI, and CAIDI[8] by work center and system-wide for each calendar year.

The Commission established a benchmarking approach to setting reliability standards for investor-owned utilities using IEEE benchmarks.[9] The Commission set MP's statewide reliability standards for its Minnesota service territory at the IEEE benchmarking second quartile for medium utilities and at the work-center level at the IEEE benchmarking second quartile for small utilities.[10]

IEEE does not publish its benchmarking results for the prior year until the third quarter of the following year, so MP does not yet know how the utility's 2024 performance metrics compare to the 2024 benchmarks. MP will make a supplemental filing within 30 days of when IEEE Benchmark Year 2025 results for 2024 Data are published.[11]

The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that MP will file later in 2025.

C.1.1. 2024 Performance

Since 2024 IEEE Benchmark Reliability Survey results will not be available until later this year, the Department reviewed 2024 performance against the 2023 IEEE benchmarks to serve as a useful proxy for the yet-to-be-calculated 2024 benchmarks. The following table shows the Company's 2024 reliability performance compared with the 2023 goals set for the statewide system using IEEE's second quartile benchmarks for medium utilities and for MP's work centers using IEEE's second quartile benchmarks for small utilities.

[8] SAIDI = System Average Interruption Duration Index, SAIFI = System Average Interruption Frequency Index, CAIDI = Customer Average Interruption Duration Index.
[9] This benchmarking methodology was first adopted in the Docket No. E015/M-20-404 Order dated December 18, 2020 (eDockets: 202012-169158-03) for service territory-wide reliability standards, Order point 7. It was later extended to the work-center level in the Docket No. E015/M-21-230 Order dated March 2, 2022 (eDockets: 20223-183363-02), at Order point 5. Order point 4 of this Order also established three work centers for MP: Central, Northern, and Western.
[10] The Docket No. E015/M-24-29 Order dated January 13, 2025 (eDockets: 20251-213880-01) is the most recent Annual Report's order and maintains the IEEE benchmarking methodology for MP's reliability standards for 2024 (at Order point 2).
[11] Report at 48.

Table 3: MP 2024 Reliability Performance vs. 2023 IEEE Benchmark[12]

Work Center	Metric	2023 IEEE Benchmark[13]	2024 MP Performance	Met Benchmark?
Central	SAIDI	180	68.46	Yes
	SAIFI	1.11	0.93	Yes
	CAIDI	132	73.92	Yes
Northern	SAIDI	180	179.99	Yes
	SAIFI	1.11	1.82	No
	CAIDI	132	99.03	Yes
Western	SAIDI	180	183.72	No
	SAIFI	1.11	1.71	No
	CAIDI	132	107.27	Yes
System	SAIDI	121	119.9	Yes
	SAIFI	1.00	1.30	No
	CAIDI	139	92.41	Yes

Source: Minnesota Department of Commerce

Table 3 provides a comparison of the IEEE 2023 performance year benchmark with MP's 2024 performance year. This comparison is meant to provide a point of reference for MP's actual 2024 reliability performance compared to the most-recent available goals. The Department will provide an updated letter reviewing the performance against the 2024 benchmarks after the Company submits its supplemental filing with the IEEE Benchmark Results Survey for the 2024 performance year.

When comparing MP's 2024 performance against 2023 benchmark, MP meets eight out of twelve of the benchmarks. The Company exceeded the SAIFI goal for its system and its Western and Northern work centers. The Company also did not meet the 2023 SAIDI goal at the Western work center.

MP identified weather as the largest reliability factor contributing to outages in 2024. The Company's review and analysis found overhead equipment failure, vegetation, and underground equipment failure to be the key factors driving those results.[14]

Based on its review of Minnesota Power's 2024 system-wide reliability requirements reporting, the Department concludes the Company appears to have fulfilled the requirements of Minnesota Rules 7826.0500 subpart 1.A., 1.B., and 1.C. along with the work center reporting required by Commission orders.

[12] MP's 2024 Performance and 2023 performance year benchmarks reported in Report at Table 2, page 17.
[13] The IEEE 2023 performance year results note that the small utility quartiles are too small to be statistically significant in the 2023 performance year. MP's work center benchmarks are based on IEEE's small utility data. See *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Supplemental Comments, October 14, 2024, Docket No. E015/24-29 (eDockets: 202410-210927-01) at Department Attachment 1, page 4 of 9.
[14] Report at pages 57 and 19.

C.1.2. Trends in Performance

The Commission Order in Docket No. E015/M-21-230 requires Minnesota Power to report reliability metrics at both the system-wide and work center level.[15]

The Department provides Figures 1 – 6 below, showing MP's SAIFI, SAIDI, and CAIDI normalized performance rates and goals for the system overall and by work center.[16]

Figure 1: SAIDI for Overall System (2020 – 2024)

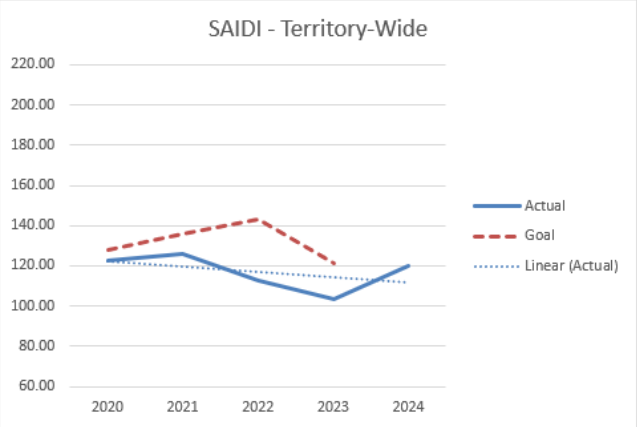


Figure 2: SAIDI by Work Center (2020 – 2024)

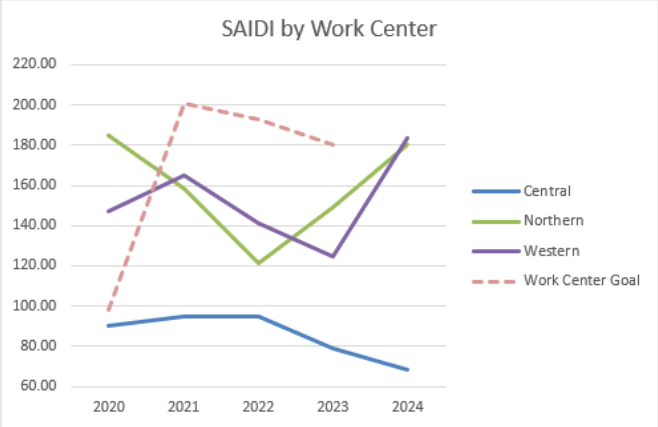


Figure 3: SAIFI for Overall System (2020 – 2024)

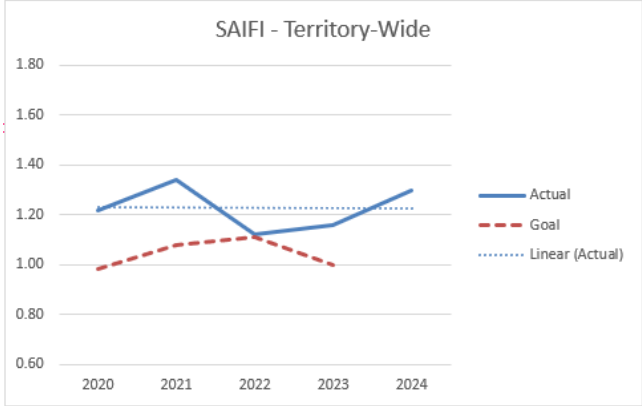
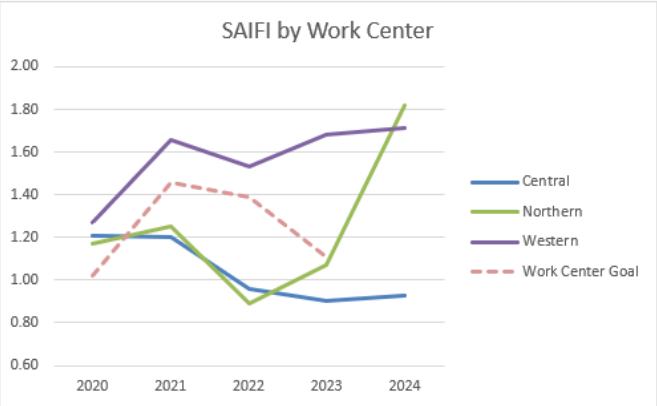


Figure 4: SAIFI by Work Center (2020 – 2024)



[15] *In the Matter of Minnesota Power's 2020 Safety, Reliability and Service Quality Standards Report*, PUC Order, March 2, 2022, Docket No. E015/M-21-225 (eDockets: 20223-183363-02) at Order Points 2 and 4.

[16] The 2024 data was retrieved from Report at Table 2, page 17. Historic data retrieved from prior filings with MP confirmation of 2020 – 2022 IEEE standards (to resolve discrepancies from prior reports) in the Department Comment's Attachment 3 in Docket No. E015/M-24-29 (eDockets: 20246-208092-01). Note that the 2020 work center goals were set by the Commission Order in Docket No. E015/M-20-404 rather than the IEEE standards.

Figure 5: CAIDI for Overall System (2020 – 2024)

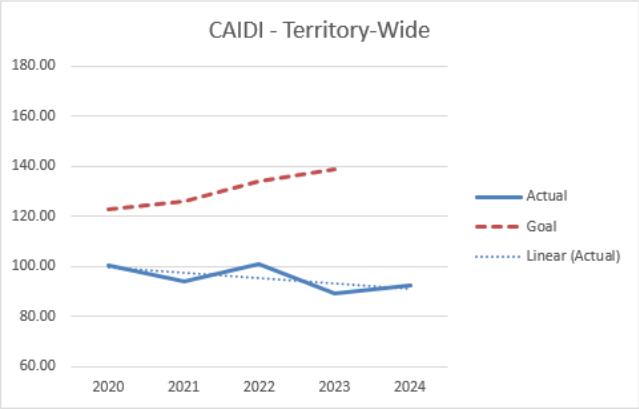
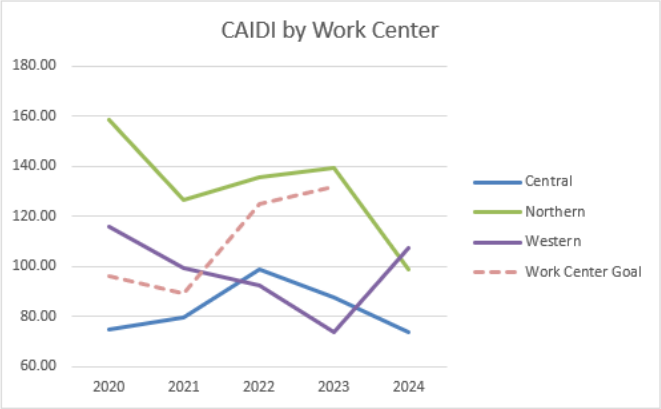


Figure 6: CAIDI by Work Center (2020 – 2024)



On an overall system level, MP's SAIDI and SAIFI values have been trending up over the last ten years while its CAIDI results have been quite stable over the last ten years. Over the last five years, MP's SAIFI performance has been stable while SAIDI and CAIDI have been improving. The Company's 2024 overall system performance is slightly worse in all metrics from the five-year trend.

On a work center level, the Central work center has generally performed the best on SAIDI, SAIFI, and CAIDI over the last five years. The Northern work center's CAIDI results improved in 2024 while its SAIDI and SAIFI performance declined. The Western work center's performance declined in 2024 in all metrics compared to 2023.

C.2. Normalization

MP uses 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 the IEEE's Major Event Threshold. In cases where a storm or other event MP experienced has a greater SAIDI than the threshold, those events are removed from the data, and this time-period is called a Major Event.[17]

In 2024, MP did not have any major events excluded, so the utility's normalized and non-normalized performance is the same.[18] MP had an average of 2.6 major events from 2019–2023, with a high of six events in 2022.[19]

C.3. Action Plan to Improve Reliability

MP stated that most of the outages in 2024 were attributed to weather, overhead equipment failures, vegetation, and underground equipment failure.[20] The Company provided updates on its efforts to

[17] Report at 56.
[18] Report at 45.
[19] Report at 57.
[20] Ibid.

address these challenges and enhance its reliability performance as described below. MP also included a discussion on reliability costs in its Report including an overview of its long-range capital plan.[21]

MP is engaging in strategic undergrounding efforts, targeting areas where customers limit access to vegetation management and areas where overhead lines were installed in inaccessible areas with heavy vegetation. The new standard for customer line extensions is to install underground facilities in all feasible locations.[22] The Company states that strategic undergrounding is a key component to improving reliability by hardening the system to be more resilient to storms.[23]

The Company highlighted the work that the Grid Modernization (Grid Mod) team has been doing, noting that the team was formalized in 2024 with three engineers reporting to a senior engineer in the Enterprise Programs department.[24] The Grid Mod team has responsibility for all grid modernization devices across the distribution system including TripSavers, motor operated switches, reclosers, IntelliRupters, smart grid sensors, and microgrid battery storage.[25]

The Company noted that its preventative maintenance program[26] should increase the reliability of MP's distribution assets going forward.[27] MP also highlighted its asset renewal programs which target areas known or likely to impact customer reliability and system resiliency.[28]

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.E.

C.4. Bulk Power Supply Interruptions

A bulk power supply interruption is defined as an interruption of a distribution feeder that is greater or equal to 46kv.[29]

Minnesota Power identified five bulk power interruptions to its system in 2025. These outages occurred on four feeders: 31 Line (Babbitt – Winton), 198 Line (Bear Creek), 59 Line (Mahtowa – Sandstone), and 23 Line (Bear Creek).[30]

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[21] Report at 22 – 25.
[22] Report at 19.
[23] Report at 26.
[24] Report at 58
[25] Report at 58. See also Report at pages 26-28.
[26] *In the Matter of Minnesota Power's 2022 Annual Safety, Reliability, and Service Quality Report*, Department Comments' Attachment A, June 16, 2023, Docket No. E015/M-23-75 (eDockets: 2023-196628-01) at PDF page 41-43 of 52 and Department Attachment 3, MP Response to Department IR No. 11.
[27] Report at 58.
[28] Report at 26.
[29] Department Attachment 4, MP Response to Department IR No. 13.
[30] Report at 58.

At the 31 Line (Babbitt-Winton), one outage was caused by contractor error, and one occurred when a transmission guy-wire fell into the feeder below. In both situations repairs were made, and in the first, safety conversations were had with MP's contractors.[31]

The remaining bulk power interruptions were caused by weather events. The interruptions at 190 Line (Bear Creek) and 59 Line (Mahtowa-Sandstone) both occurred on May 10th when wind caused vegetation to fall. Vegetation crews removed the vegetation and corrected other encroachment issues identified. The interruption at 23 Line (Bear Creek) was the result of a lightning strike causing the line to lock out. The area lightning arrestors were inspected and replaced as needed.[32]

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.F.

C.5. Major Service Interruptions

A major service interruption is an outage on a feeder of any voltage class that meets all the following criteria: feeder lockout, greater than 500 customers affected, and no customer restored before the 60-minute mark.[33]

Appendix A lists MP's major service interruptions in 2024. It includes 27 distribution system status outage notifications with an average duration of 119.41 minutes which affected an average of 1,350 customers. This represents an increase in outage events but a decrease in the average duration and average number of customers impacted per event (from 23 outages in 2023 with an average of 183.43 minutes and 1,604 customers impacted).

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.G.

C.6. Worst Performing Circuit

Consistent with past reports, 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 2024 information in Table 4 below.

The Department notes:

- The highest SAIDI result was in the Western work center's rural area. The Western work center's rural location with the highest customer outage minutes had the second highest SAIDI results of the feeder data provided for worst-performing feeders.
- The International Falls 2 feeder had both the highest SAIDI and highest customer outage minutes for the Northern work center's urban area.

[31] Report at 59.
[32] Ibid.
[33] Department Attachment 4, MP Response to Department IR No. 13.

- Of the eleven feeders which were reported as MP's 2024 worst performing feeders, none were repeat worst performers from 2020 – 2023 (as far back as the Department has tracked this detail on a per work center basis).

Table 4: Summary of MP's 2024 Worst-Performing Feeders in Urban and Rural Areas by Work Center[34]

	Criteria	Work Center	Circuit	# of Customers	SAIDI	SAIFI	CAIDI
Urban	High SAIDI	Central	Colbyville 244	2,312	152.80	2.40	63.79
		Northern	International Falls 2	1,376	448.91	2.06	217.42
		Western	Nature Road Stepdown 1	658	388.42	3.39	114.51
	High CAIDI	Central	Ridgeview 252	3,061	115.70	0.89	129.44
		Northern	International Falls 2	1,376	448.91	2.06	217.42
		Western	South Pine River Stepdown 1	926	316.44	2.33	135.53
Rural	High SAIDI	Central	Pioneer Road 270	336	459.29	6.43	71.38
		Northern	Spudville East 1	62	641.87	2.73	235.48
		Western	Cuyuna 1	115	1,103.63	4.72	233.73
	High CAIDI	Central	Sandstone 452	1,221	402.38	2.45	164.32
		Northern	Chisholm 2	570	387.98	5.04	76.92
		Western	Little Falls North Stepdown 1	596	1,058.79	3.28	322.62

Source: Minnesota Department of Commerce

MP described its efforts to address reliability issues on the worst performing feeders in each of its work centers in the Report along with details on the outage causes.[35] MP indicated that some feeder issues have been addressed with its ongoing grid modernization efforts while others will require significant upgrades to infrastructure or options are still under review. For example, MP noted that the Chisholm area will be undergoing a complete overhaul in the next few years.[36]

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.H.

C.7. Compliance with ANSI Voltage Standards

MP provided Table 18 listing the known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute (ANSI) for nominal system voltage greater or less than voltage range B. The Company reported 21 instances of voltage violations in 2024 compared to 17 in 2023.[37] From 2014 – 2023, MP reported an average of 15.6 violations, so 2024 reflects an increase from the recent ten-year average. Most instances were attributed to underground equipment (13 instances) and overhead equipment (5 instances) in 2024.

[34] Report at Tables 15-17, pages 60 – 62.
[35] Report at 60-63.
[36] Report at 62.
[37] Report at 63.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.I.

C.8. Work Center Staffing Levels

Minnesota Power provided work center staffing data, including the number of full-time employees by work center in 2024 in Table 19 on page 65 of the filing. This information is summarized, along with a comparison to 2023 reported employee counts below.

Table 5a: Comparison of MP's 2023 and 2024 Staffing Levels by Work Center[38]

Description	Central			Northern			Western		
	2023	2024	Δ	2023	2024	Δ	2023	2024	Δ
Line Ops Field – Line	48	47	-2%	25	25	0%	31	32	3%
Line Ops Field – Substation	8	14	75%	8	9	13%	5	6	20%
Line Ops Support – OPS	1	3	200%	1	1	0%	1	2	100%
Line Ops Support – Line	7	6	-14%	2	2	0%	2	2	0%
Line Ops Support – Fleet	10	9	-10%	3	3	0%	3	3	0%
Line Ops Support – Substation	2	6	200%	1	1	0%	-	-	-
Line Ops Support – Inventory	6	7	17%	2	3	50%	3	3	0%
Engineering Support – Distribution	22	22	0%	8	10	25%	10	10	0%
Engineering Support – Meter	16	16	0%	1	2	100%	5	5	0%
Engineering Support - GIS	9	-	-100%	1	-	-100%	1	-	-100%
Total	**129**	**130**	**1%**	**52**	**56**	**8%**	**61**	**63**	**3%**

Source: Minnesota Department of Commerce

[38] Report at Table 19, page 65.

Table 5b: Comparison of MP's 2023 and 2024 Staffing Levels of Common Staff [39]

Description	2023	2024	Δ
Line Ops Field – Service Dispatch	8	8	0%
Line Ops Field – System Operations	21	21	0%
Line Ops Field – Veg. Management	3	4	33%
Engineering Support – GIS	-	10	-
Engineering Support – Relay	8	8	0%
Engineering Support – Transmission	7	7	0%
Engineering Support – Substation	17	16	-6%
Contractors – Line	52	44	-15%
Contractors – Groundline	10	12	20%
Contractors – Engineering	-	12	-
Contractors – Vegetation	80	100	25%
Total	**206**	**242**	**17%**

Source: Minnesota Department of Commerce

MP increased overall staffing levels by 43 positions in 2024, 60% of which were contractors.[40] In 2024, MP created two new common staff roles: Engineering Support – GIS and Contractors – Engineering.

- The Engineering Support-GIS roles were moved from being reported by work center to being reported as Common Staff. MP explained that most of the GIS employees are located in the Duluth area and support the entire company.[41] There was an increase of one Engineering Support – GIS role in 2024.
- MP increased the number of contractors from 142 in 2023 to 168 in 2024 and added a new category of contractors for engineering. MP explained that contract engineers focus on programs such as strategic undergrounding and grid modernization projects while many of MP's engineering staff are focused on asset renewal and break-in work such as road relocations or customer request.[42]

MP stated that the overall increase in staffing has mostly been an increase in contractors who are assisting with the growing budgets tied to asset renewal, reliability, and grid modernization projects. In part, contractors have filled some difficult to hire positions across the organization which MP hopes to eventually fill internally, releasing contract employees at that time.[43]

[39] Ibid.
[40] Total staff count increase calculation: 2024 Total Staff Count (Central 130 + Northern 56 + Western 63 + Common Staff 242 = 491) - 2023 Total Staff Count (129 Central + 52 Northern + 61 Western + 206 Common Staff = 448) = 43.
Contractor increase calculation: Difference between 2024 Contractor Count (44 Line + 12 Groundline + 12 Engineering + 100 Vegetation = 168) and 2023 Contractor Count (42 Line + 10 Groundline + 80 Vegetation = 142) = 26 divided by 2024 staff increase of 43 = 60.46%.
[41] Department Attachment 5, MP Response to Department IR No. 7.
[42] Ibid.
[43] Department Attachment 6, MP Response to Department IR No. 8.

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

C.9. Other Information

MP provided additional reliability performance data as required by Commission orders beginning on page 66 of its SRSQ Report. The Department reviews this information below, in section F. Compliance with Pertinent Commission Orders.

C.10. Department Recommendation

The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that MP will file later in 2025.

D. RELIABILITY STANDARDS FOR 2025

In Compliance with the Order in last year's SRSQ filing, Minnesota Power included a discussion of reliability benchmarking in its report.

D.1. MP's Proposed Five-Year Rolling Average Reliability Standard

MP proposed using a five-year average of the IEEE benchmarks to set MP's benchmarking.[44] MP's proposed reliability benchmarking would continue basing the statewide system benchmark on IEEE's results for medium-sized utilities and work center benchmarks on small-sized utilities and have a one-year lag of IEEE data compared to the MP performance year. This means that for the 2025 performance year, MP proposes to benchmark the company's performance against IEEE Benchmark Year 2021-2025 results for 2020 – 2024 data.[45] MP proposed moving away from a performance year matching approach to eliminate the need for a supplemental filing given that reliability varies year over year and nationally, peers experience varied weather, so a trend-based approach smooths out some of this volatility.[46]

MP states that it feels a trend-based approach aligns more closely with the lifecycle of its reliability improvement projects which often take multiple seasons or year to complete.[47] MP noted that before 2017, the Company used an internal 5-year average for goal setting; however, this resulted in data siloed from the rest of the industry.[48]

The Department would caution that this still doesn't control for the possibility that IEEE data won't be available or reliable if insufficient reporting occurs, given that IEEE reliability reporting is voluntary and managed outside of the PUC's jurisdiction. MP suggested that if there is a year where not enough

[44] Report at 48.
[45] Department Attachment 7, MP Response to Department IR No. 6 and confirmation email.
[46] Ibid at 3.
[47] Report at 53.
[48] Report at 49.

utilities participated, that year could be thrown out of the average and that using a 5-year, even with less participants, would create significant results.[49] In response to Department information request 6, MP provided the number of participants by utility size included in the IEEE data. While only 2023 results had a note from IEEE that the sample size (4) was too small to be statistically significant, the average number of small-sized utility participants from 2019 – 2023 was 4.6. Given that 2023 participation was not atypical, the Department would not advocate excluding 2023 from the average if MP's proposed methodology is adopted.

D.2. Discussion of EIA 861 Data

MP stated that it supplies annual data for EIA 861 each year, but that EIA 861 only asks for annual totals.[50] EIA 861 publishes summary information for all participants, but without performing statistical analysis.[51] MP also notes that while the IEEE submission process prevents the participant from moving forward if any data is missing or incorrect,[52] EIA 861 appears to have minimal efforts to verify data accuracy and consistency.[53]

The EIA 861 website describes the data as a census of all United States electric utilities.[54] The 2023 final data appears to have been released on October 10, 2024, and the site lists the next release as October 2025. The 2023 final data for reliability includes responses from 967 utilities, including 42 responses from cooperative, municipal, and investor-owned utilities in Minnesota. Responding utilities provided varying levels of detail, typically providing data based on either the IEEE standard or an "other standard" that does not provide additional detail. Some utilities provided all data points for their chosen standard while some provide just a few of the data points for the chosen standard.[55] In 2023, EIA's reliability data provided a state summary, but this does not correspond to a simple average of the detailed data from the states tab. The methodology for the states tab of EIA data is unclear, and it was not provided in the 2021 and 2022 data that the Department reviewed.

The Department considers MP's concerns about the completeness of EIA data to be valid. The Department also notes that in order to provide relevant benchmarking, statistical analysis of EIA data would be required to determine appropriate comparisons.

D.3. Department Analysis

The Department reviewed MP's proposed 2025 benchmark methodology, the historic IEEE benchmarking approach, and EIA data. A comparison of these potential benchmark options is included below.

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[49] Department Attachment 7, MP Response to Department IR No. 6 at 3.
[50] Report at 51.
[51] Ibid.
[52] Report at 50.
[53] Report at 51.
[54] *Annual Electric Power Industry Report, Form EIA-861 detailed data files.* U.S. Energy Information Administration, (October 10, 2024). Available at: https://www.eia.gov/electricity/data/eia861/.
[55] The Department reviewed the EIA 861 data for 2023, Reliability_2023 spreadsheet to provide this detail on the EIA results.

Table 6: Comparison of Potential Benchmarks against MP's 2024 Performance[56]

Work Center	Metric	2023 IEEE Benchmark[57]	Proposed 5-Yr Avg IEEE Benchmark[58]	2023 EIA MN Data, IEEE standard[59]	2024 MP Performance
Central	SAIDI	180	172.80	72.80	68.46
	SAIFI	1.11	1.34	0.778	0.93
	CAIDI	132	107.2	93.60	73.92
Northern	SAIDI	180	172.80	72.80	179.99
	SAIFI	1.11	1.34	0.778	1.82
	CAIDI	132	107.2	93.60	99.03
Western	SAIDI	180	172.80	72.80	183.72
	SAIFI	1.11	1.34	0.778	1.71
	CAIDI	132	107.2	93.60	107.27
System	SAIDI	121	133.60	72.80	119.9
	SAIFI	1.00	1.07	0.778	1.30
	CAIDI	139	129.2	93.60	92.41

Source: Minnesota Department of Commerce

The Minnesota EIA data reported on the State Total tab of the 2023 EIA reliability data is significantly lower than the IEEE data, but the raw data reported by utilities also shows clear reporting gaps. MP also stated that the EIA reporting system does not include validation to ensure quality data collection or consistent definitions used by utility in their data reporting. Additionally, EIA results are raw data which would require additional analysis to determine appropriate comparisons to develop meaningful benchmarks for performance. For these reasons, The Department does not recommend shifting reliability benchmarking to the EIA data.

The Department agrees that using a five-year average of data to develop the reliability benchmark for MP would smooth out individual year variability. When considering MP's proposal to use a five-year average of IEEE data rather than matching the performance year of IEEE data, the Department accepts MP's comment that a trend-based approach is appropriate because IEEE data reflects national results which may not be influenced by the same factors influencing MP's individual year performance. Because of this, the Department also is supportive of shifting from matching a single performance year to taking a trend-based approach to benchmarking. The Department also supports allowing a one-year

[56] MP's 2024 Performance and 2023 performance year benchmarks reported in Report at Table 2, page 17.
[57] The IEEE 2023 performance year results note that the small utility quartiles are too small to be statistically significant in the 2023 performance year. MP's work center benchmarks are based on IEEE's small utility data. See *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Supplemental Comments, October 14, 2024, Docket No. E015/24-29 (eDockets: 202410-210927-01) at Department Attachment 1, page 4 of 9.
[58] The proposed 5-year average IEEE benchmark column reports the average of the 2019 – 2023 performance year data. The 2023 small-sized IEEE results (listed for work center benchmarks) was denoted as not statistically significant in IEEE's results.
[59] The EIA data column reports the EIA reported IEEE standards reliability data without major events, state total for Minnesota from the 2023 Reliability data retrieved from *Annual Electric Power Industry Report, Form EIA-861 detailed data files.* U.S. Energy Information Administration, (October 10, 2024). Available at: https://www.eia.gov/electricity/data/eia861/.

lag in the trend analysis compared to the performance year in order to eliminate the need for a supplemental filing (based on the IEEE's pattern of publishing the prior performance year's results in the third quarter of the current year) and in recognition of the fact that national reliability data (such as IEEE results) would be based on utilities experiencing different weather impacts than Minnesota utilities may experience. The Department also understands the concern of siloed data comparisons if utilities are benchmarked against their own performance rather than broader industry performance.

The Department will continue reviewing MP's reliability performance in the given year against the approved benchmarks as well as reviewing MP's year-over-year performance to understand the Company's performance trend.

See section C.1. for further commentary on MP's reliability performance and standards for 2024.

D.4. Department Recommendation

As a result of reviewing the information provided, the EIA website and reliability data, and the analysis above, the Department supports MP's proposal to benchmark MP's 2025 performance to the five-year average of the IEEE benchmarks (2020 – 2024 performance year data), comparing MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data. If IEEE does not report utility-sized response results in the future, the Department recommends that the IEEE overall results for that year be used instead of relying on the utility-size results for the benchmark calculations.

E. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules 7826.1300 require each utility to file information regarding its service quality performance as detailed in Minnesota Rules 7826.1400 through 7826.2000.

The Department provides a summary and analysis of the service quality reporting requirements from Minnesota Rules and as modified by Commission Orders below.

E.1. Meter Reading Performance (Minn R. 7826.1400)

MP provided detailed meter reading information, including information on its monthly meter-reading staffing levels in its Report. Table 7 summarizes MP's meter reading statistics.

Table 7: Meter-Reading Performance 2014-2024 [60]

Year	Company Read	Estimated	% Estimated
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%
2023	157,087	124	0.08%
10-Year Average	**149,660**	**375**	**0.24%**
2024	155,069	105	0.07%

Source: Minnesota Department of Commerce

MP deployed automated meter reading equipment to most of its customers from 2009 to 2023 and reported that 99.75% of its customers have AMI- Solid State meters as of January 2024.[61] Customers who opt-out of AMI now pay a $20 monthly fee to read and maintain their meters.[62]

The Company reported eight meters at Company-read service points were not read for a period of 6-12 months in 2024 and seven meters that were not read for a period greater than 12 months.[63] Customers with Company-read meters that were not read for 6-12 months were left reminder notices at the premises and/or sent reminder letters of the utility's need to access the meter, and phone calls are made to schedule meter readings.[64] When an account is unresponsive, a disconnection warning is issued; however, disconnections for unread meters are not performed during Cold Weather Rule months.[65]

The Company reported it maintained an average of approximately 6.0 meter-reading customer service representatives in 2024. This number increased slightly from 5.83 meter-reading staff reported in 2023.[66]

[60] Report at Tables 25-29, pages 71-73.
[61] Report at 70-71.
[62] Report at 70 and 88.
[63] Report at 75.
[64] Ibid.
[65] Ibid.
[66] Report at 76.

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

E.2. Involuntary Disconnections (Minn. R. 7826.1500)

The following table summarizes residential customer disconnection statistics reported by MP in its annual reports.

Table 8: Residential Customer Involuntary Disconnect Information [67]

Year	Received Disconnect Notice	CWR Protection			Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought	Granted	% Granted		Count	%	
2014	35,796	2,852	2,852	100.0%	3,257	799	24.5%	443
2015	22,537	2,173	2,173	100.0%	520	154	29.6%	56
2016	12,191	2,916	2,916	100.0%	1,933	213	11.0%	634
2017	17,454	3,475	3,475	100.0%	2,668	1,284	48.1%	1,680
2018	18,961	4,311	4,311	100.0%	2,492	1,219	48.9%	1,592
2019	16,049	4,232	4,232	100.0%	2,138	1,056	49.4%	1,357
2020	5,925	2,845	2,845	100.0%	298	149	50.0%	206
2021	17,523	1,295	1,295	100.0%	1,019	566	55.5%	546
2022	21,538	2,404	2,404	100.0%	2,027	1,295	63.9%	1,345
2023	20,927	3,968	3,968	100.0%	3,035	1,991	65.6%	2,111
10-Yr Avg	**18,890**	**3,047**	**3,047**	**100.0%**	**1,939**	**873**	**44.7%**	**997**
2024	20,485	3,886	3,886	100.0%	3,116	2,111	67.7%	2,026

Source: Minnesota Department of Commerce

MP reported that 21,748 disconnection notices were sent to residential, small commercial, and large commercial customers in 2024 with 20,485 (94.2%) of these notices being for residential customers. All customers seeking cold weather rule protection were granted it, and the percent of disconnections restored within 24 hours has been increasing over the last ten years.

The disconnection moratorium that was in place during the early part of the COVID-19 pandemic ended in 2021,[68] and disconnection notices increased in subsequent years with a peak of 21,538 notices sent in 2022. This figure is down modestly again in 2024.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.1500.

[67] Report at Tables 38-41, pages 84-86.
[68] The disconnection moratorium was in effect from March 2020 to August 2021. See Docket E, G999/CI-20-375.

E.3. Service Extension Request Response Times (Minn. R. 7826.1600)

Table 9 below summarizes MP's 2024 service extension request data.

Table 9: 2024 Service Extension Requests [69]

Service Type	New Service		Previously Served Location	
	# of Installations	% Request Date Met	# of Installations	% Request Date Met
Residential	1,011	93.3%	392	99.5%
Commercial	165	78.2%	21	90.5%
Industrial	-	-	-	-
Municipal	16	75.0%	4	100%
Total	**1,192**	**90.9%**	**417**	**99.0%**
5-Yr Avg[70]	**1,230**	**66.0%**	**1,943**	**94.1%**

Source: Minnesota Department of Commerce

The number of service extensions requests in 2024 was down from the five-year average for both new sites and previously served locations. MP met significantly more of its new service request timelines in 2024 than the recent average and made modest improvements to the already strong response time for previously served locations. Consistent with last year, the Company stated that the primary reason for delays was customer's contractor/electrician not ready.[71]

The Department acknowledges that MP has fulfilled the requirements of Minnesota Rules 7826.1600.

E.4. Call Center Response Times (Minn. R. 7826.1200 and 7826.1700)

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 7826.1200 requires that 80% of calls during business hours be answered within 20 seconds.

[69] Report at Figures 24-31, pages 90-96.
[70] Five-year average is based on 2019-2023 performance years as MP reported in prior SRSQ reports.
[71] Report at 93.

Table 10: Call Center Response Times [72]

Year	Business Hours		After Hours		Combined
	Total Calls Offered	% Answered within 20 Seconds	Total Calls Offered	% Answered within 20 Seconds	% Answered within 20 Seconds
2020	115,251	81.48%	18,202	50.69%	77.28%
2021	123,019	50.01%	19,287	48.95%	49.86%
2022	134,035	44.85%	19,572	41.42%	44.42%
2023	118,212	79.95%	14,611	51.74%	76.85%
4-Year Avg[73]	**122,629**	**64.07%**	**17,918**	**48.20%**	**62.10%**
2024	116,017	80.35%	15,329	77.21%	79.98%

Source: Minnesota Department of Commerce

In 2024, MP met the requirement to answer 80% of calls during business hours within 20 seconds for the first time since 2020. Most calls (88%) occurred during business hours.[74]

The Company answered 79.98% of all calls within 20 seconds, and 80.35% of calls during business hours within 20 seconds in 2024. November was the lowest performance month with 66% of calls during business hours answered within 20 seconds, and March and April were the highest performance months with 90% of calls during business hours (7 am – 5:30 pm) answered within 20 seconds. MP explained that the Company had three experienced Call Center staff move into other positions in the Company in July and August, resulting in short-staffing followed by a training period for onboarding staff that aligned with an increase in call volume in the fall, at the start of the Cold Weather Rule.[75] The low performance in November was influenced by staffing shortages, absences for illness, and completing training of new hires to begin taking calls the first week of December, which saw a rebound in response times to 84%.[76]

The Department concludes MP is in compliance with the reporting required under Minnesota Rules 7826.1200 and 7826.1700.

E.5. Emergency Medical Account Status (Minn. R. 7826.1800)

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

[72] Report at Tables 43 - 44, pages 101-103.
[73] The Department notes that Docket E015/M-20-404 did not detail call counts, so the Department provides a four-year average (2020-2023) for comparison rather than a five-year average as has been provided for some other metrics.
[74] Calculation: 116,017 calls during business hours / (116,017 business hour calls + 15,329 after hours calls).
[75] Report at 99.
[76] Report at 99-100.

In 2024, 91 MP customers requested, and all were granted, emergency medical account status.[77] This is a decrease from the 98 customers who requested and were granted emergency medical account status in 2023.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.1800.

E.6. Customer Deposits (Minn. R. 7826.1900)

No customers were required to make a deposit as a condition of receiving service in 2024.

MP refunded all customer deposits in 2014, and the Company generally does not collect deposits, though deposits "may be reconsidered in the future as part of a specific electric service agreement provision for a commercial or industrial customer."[78]

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.1900.

E.7. Customer Complaints (Minn. R. 7826.2000)

MP's report on customer complaints included the required information. Table 11 contains a limited summary of MP's customer complaint history.

Table 11: Customer Complaint Selected Summary (2019 – 2024) [79]

Year	Number of Complaints	# Forwarded by CAO	% Same Day Resolution	% Resolved by Taking Customer-Requested Action	Top Complaint: High Bill
2019	525	40	60.0%	13.9%	69.3%
2020	545	30	52.0%	21.5%	78.7%
2021	513	27	29.6%	29.0%	81.5%
2022	346	32	13.9%	15.6%	81.9%
2023	161	25	15.5%	11.2%	82.6%
5-Year Avg	**418**	**31**	**34.2%**	**18.2%**	**78.8%**
2024	265	27	30.2%	10.9%	77.7%

Source: Minnesota Department of Commerce

Last year the Company indicated that it anticipated an increased complaint count in 2024 as interim rates went into effect on January 1, 2024, and MP indicated that it believes the number of complaints in a given year is in large part driven by increases on customer bills through rate cases (interim rates or final rates), other line item changes, and/or bill increases due to increased usage (typically with

[77] Report at 104.
[78] Report at 105.
[79] Report at Tables 46-49, pages 106-108.

particularly cold winters).[80] This prediction bore out, with a large increase (104) in complaints while the top complaint category remained high bill, which made up 77.7% of complaints in 2024. In 2024, 92% of complaints were from residential customers.[81] The Company had a large increase in complaints which were outside of its control (80% in 2024 compared to a five year average of 60% from 2019-2023).[82] MP explained that this is a result of meter data accuracy through the full AMI deployment and that the enhanced data transparency provided into metering allows analysts to determine when the issues are related to usage on the customer's side of the meter.[83] The Company added that this data accuracy also empowered customers to take proactive steps to manage their energy consumption.[84]

The Company received 27 customer complaints that were forwarded from the Commission's CAO, below the five-year average of 31.

The Department acknowledges MP's fulfillment of the requirements of Minnesota Rules 7826.2000.

E.8. Department Recommendation

The Department recommends that the Commission accept MP's annual service quality report pending receipt of detail in its Supplemental Filing as outlined in sections F.2. and F.4.1. below.

F. COMPLIANCE WITH PERTINENT COMMISSION ORDERS

F.1. Docket No. E015/M-19-254 Order dated January 28, 2020

The Commission's January 28, 2020 Order in Docket No. E015/M-19-254 included Attachment B: Updated Annual Reporting Requirements.[85] The Department summarizes MP's compliance with each reporting requirement in turn below.

The requirements outlined in Attachment B include some reliability performance metrics that were discussed earlier in these comments as well as some additional metrics.

The Department notes that the Order required utilities to provide normalized and non-normalized data for several metrics. From the Department's perspective, normalizing data may be useful when looking at broad system trends such as SAIDI and SAIFI, and average customer impacts such as CAIDI and MAIFI can be deduced by these system trends. In contrast, the purpose of capturing CEMI and CELI is to better understand extremes (rather than averages), so normalizing this data seems to minimize the impact of multiple or lengthy interruptions experienced by customers by erasing the most extreme examples. With that said, the Department can appreciate the usefulness of being able to compare

[80] *In the Matter of MP's 2023 annual SRSQ Report,* Department Comments' Attachment 7 (Email response from MP regarding customer complaints), June 28, 2024, Docket No. E015/M-24-29 (eDockets: 20246-208092-01) at PDF page 45 of 54 (hereinafter "Docket No. E015/M-24-29 Department Comments").
[81] Report at 106.
[82] Report at 108.
[83] Department Attachment 8, MP Response to Department IR No. 9.
[84] Ibid.
[85] The Order's Attachment B is included as Department Attachment 9.

normalized and non-normalized data, as a result we continue to support the reporting of both normalized and non-normalized data.

F.1.1. Non-normalized SAIDI, SAIFI, and CAIDI values

There were not any major events excluded based on the IEEE 2.5 beta method in 2024, so the normalized and non-normalized are the same. The Department's commentary on reliability performance is in section C.1. above.

F.1.2. Normalized SAIDI, SAIFI, and CAIDI values

The Department's commentary on normalized SAIDI, SAIFI, and CAIDI values is provided in section C.1. above.

F.1.3. MAIFI[86] – Normalized and Non-normalized

MP provided the normalized and non-normalized MAIFI on page 55 of its annual report, and the Department provides this information below.

Table 12: Normalized MAIFI for 2024 and Three-Year Average (2021-2023)[87]

Work Center	2024 MAIFI	3-Yr Average (2021-2023)
Central	3.24	3.43
Northern	3.11	2.68
Western	4.62	4.64
System	3.62	3.67

Source: Minnesota Department of Commerce

As in 2023, customers in the Western service area again experienced the highest rate of momentary outages in 2024. Compared to the 2021-2023 three-year average, the Northern work center had an increase in momentary interruptions while the Central and Western work centers as well as the system have seen improvements.

[86] MAIFI = Momentary Average Interruption Frequency Index.
[87] Report at Table 13, page 55.

F.1.4. CEMI[88] – Normalized and Non-normalized outage levels of 3, 4, 5, and 6[89]

MP's CEMI reporting requirements were clarified by a later Commission order to include system and service area reporting for CEMI data, with storm included and storm excluded, at outage levels 3, 4, 5, and 6.[90] The Company provided this information in Table 20 of its report.

Table 13: Storm Included CEMI for 2024 and Three-Year Average (2021-2023) [91]

Number of Interruptions	Overall		Central		Northern		Western	
	2024	Avg*	2024	Avg	2024	Avg	2024	Avg
3	6.84%	7.21%	1.08%	8.62%	4.92%	5.15%	18.54%	10.97%
4	0.35%	3.05%	0.00%	0.33%	1.47%	3.92%	0.41%	5.42%
5	3.17%	1.31%	0.69%	1.49%	12.21%	0.00%	2.98%	4.08%
6+	0.24%	1.46%	0.44%	2.46%	0.00%	0.04%	0.00%	1.71%

**The overall averages are five-year averages (2019-2023).*

Source: Minnesota Department of Commerce

MP has been reporting service area-level data since 2021, so the Department reviewed 2024 CEMI rates against the three-year average for 2021 – 2023 for work centers and against the five-year average (2019 – 2023) for the overall system. Most CEMI rates were better in 2024 compared to the recent averages, except for the percent of the Western area's customers experiencing three interruptions.

F.1.5. Highest number of interruptions experienced by any one customer

MP provided this information on page 66 of its Annual Report by work center:

- Pioneer Road 270: 6.43 outages (Central);
- Balkan 2: 5.95 outages (Northern); and
- Little Falls South 1: 5.46 outages (Western).

Each of the highest CEMI feeders in 2024 is unique from the highest CEMI feeders reported in 2023.

[88] CEMI = Customers Experiencing Multiple Interruptions.
[89] This reporting requirement was clarified *In the Matter of MP's 2022 Annual SRSQ Report,* PUC, Order, December 5, 2023, Docket No. E015/M-23-75, (eDockets: 202312-200980-02), at Order Point 7 (hereinafter "Docket No. E015/M-23-75 SRSQ PUC Order").
[90] Ibid.
[91] Report at Table 20, page 66.

F.1.6. CELI[92] – Normalized and Non-normalized at intervals greater than 6, 12, and 24 hours[93]

MP's CELI reporting requirements were clarified by a later Commission order to include system and service area reporting for CELI data, with storm included and storm excluded, for outages of 6, 12, and 24 hours.[94] The Company provided this information in Table 21 of its report.

Table 14: Storm Included CELI for 2024 and Three-Year Average (2021-2023)[95]

Length of Interruptions	Overall		Central		Northern		Western	
	2024	Avg	2024	Avg	2024	Avg	2024	Avg
6 hr.	3.88%	7.19%	1.85%	4.68%	7.75%	12.25%	5.61%	16.13%
12 hr.	0.05%	3.03%	0.02%	2.19%	0.06%	2.51%	0.08%	8.36%
24 hr.	0.00%	0.86%	0.00%	1.06%	0.00%	0.57%	0.00%	2.39%

Source: Minnesota Department of Commerce

CELI data was up slightly in 2024 compared to 2023 but remained below the recent averages because of the peaks seen in 2022. The Central area performed better than the overall system while the Northern and Western areas' performance drove the increase for the overall system.

F.1.7. Longest interruption experienced by any one customer

MP provided this information by work center on pages 66-67 of its Annual Report. The Company reported the longest interruptions experienced at each of its work centers.

Compared to the longest outage in 2023 (6,360 minutes in the Northern work center's region), the longest outage length was significantly lower in 2024. In 2024, the Company's longest interruption in 2024 was 1,082 minutes, affecting one customer of the Western work center. The Central work center had a similar length outage of 1,078 minutes which affected three customers. The longest outage for the Northern work center in 2024 was 863 minutes and affected 12 customers. The longest outages at each work center in 2024 were caused by strong winds that took down trees and overhead lines.

F.1.8. Breakdown of field versus office staff

The Department previously discussed staffing and included this information in Tables 5a and 5b of these comments.

[92] CELI = Customers Experiencing Lengthy Interruptions.
[93] The Docket No. E015/M-23-75 SRSQ PUC Order, (eDockets: 202312-200980-02), at Order Point 7 further clarified this reporting requirement
[94] Ibid.
[95] Report at Table 21, page 66.

F.1.9. Estimated restoration times

The Company provided this information on page 68 of its Annual Report.

MP explained in a clarification last year that the Company provides initial estimates when an outage is reported based on the GIS model and prediction engine in the software. The Company then provides a final estimated restoration time after a sight/system assessment is completed in the field. The Report's Table 23 provides the accuracy of the initial and final estimated restoration times compared to the actual restoration time.[96]

Table 15: Estimated Time of Restoration (ETR) Accuracy[97]

ETR Accuracy %	Earlier than -90 minutes	-90 to 0 minutes	0 to +30 minutes	Later than 30 minutes
Initial	53.8%	29.9%	3.8%	12.5%
Final	69.7%	26.2%	1.3%	2.8%

Source: Minnesota Department of Commerce

Last year the Department had expressed concern in the degradation of ETR accuracy compared to prior years, and the Company explained that it anticipated its new Outage Management System (OMS), anticipated to be in service in late 2024 would provide more accurate information including ETR calculations.[98]

MP's accuracy improved significantly in 2024 compared to 2023. In 2023, 83.2% of initial estimates were restored later than 30 minutes from the ETR whereas in 2024, 83.7% of the initial estimates were restored by or before the ETR. For the final estimates, the accuracy was even better in 2024, with 96% of restorations being by or before the estimated restoration time.

F.1.10. 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. Reliability performance and benchmarking is discussed further in section C.1. Reliability Performance of these comments.

F.1.11. Performance by customer class

The Company provided this information in Table 22 on page 67 of its Annual Report.

The Department reviewed this data in relation to the most recent years' performance as well as against the recent three-year averages from 2021-2023. Many reliability metrics experienced a peak in 2022 which skewed the three-year averages higher. As a result, despite most performance by customer class values being relatively stable from 2023 to 2024, the 2024 results are significantly lower (better) than

[96] Docket No. E015/M-24-29 Department Comments' Department Attachment 9 (Company Response to Department IR 3) (eDockets: 20246-208092-01) at PDF page 48 of 54.
[97] Report at Table 23, page 68.
[98] *In the Matter of MP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Response Comments, August 6, 2024, Docket No. E015/24-29 (eDockets: 20248-209308-01) at 1.

the recent three-year averages. The non-normalized Residential and Commercial SAIDI and CAIDI show the greatest variance (improvements) in 2024 from the recent average.

F.1.12. Causes of sustained customer outages by work center

MP provides a summary of worst performing feeder information including number of customers impacted and causes on pages 59 – 63 of its Annual Report and outlined above in section C.6. of the Department's Comments.

MP also provided Appendix A which includes Distribution System Status Outage Notifications including outage details such as outage duration, number of customers affected, and causes of outages. The notifications in Appendix A do not include results at the work center level.

F.2. Docket No. E015/M-19-766 Order dated December 9, 2020: Remote Reconnect Pilot

The Commission's December 9, 2020 Order in Docket E015/M-19-766 approved the Company's Remote-Reconnect Pilot program and set requirements for pilot program data to be reported in the Company's annual SRSQ report.[99] The Remote-Reconnect Pilot Program was initially approved for three years, but was later extended to five years, running from August 2021 – July 2026.[100]

Table 16a, below, summarizes the Remote-Reconnect Pilot program's reporting.

Table 16a: Remote-Reconnect Reporting (2021 – 2024)[101]

Reporting Criteria	2021[102]	2022	2023	2024
Participating Customers	3,731	4,437	10,178	11,630
LIHEAP[103] Customers (monthly average)	8,100	8,876	9,518	9,492
Self-Declared Low-Income Customers	NA	NA	564	477
Remote-Reconnect Participants receiving LIHEAP	904	823	2,027	1,862
Customers who Opted Out of the Pilot	15	24	42	46
Estimated Annual Cost Savings from Remote-Connect Program	($464,000)	($48,000)	($652,000)	($67,000)

Source: Minnesota Department of Commerce

[99] *In the Matter of MP's Reconnect Pilot Program*, PUC, Order, December 9, 2020, Docket No. E015/M-19-766, (eDockets: 202012-168890-01), at 4 described the Remote-Reconnect program reporting requirements (hereinafter "Remote-Reconnect Pilot Docket No. E015/M-19-766").
[100] Remote-Reconnect Pilot Docket No. E015/M-19-766, PUC, Minutes, January 9, 2024, (eDockets: 20241-202001-02). The consent agenda minutes reflect the PUC's approval to extend the Remote-Reconnect Pilot Program from three to five-years, running from August 2021 – July 2026.
[101] Report at 88-89.
[102] Note that the Pilot began in August 2021, so 2021's data is for a partial year.
[103] LIHEAP = Low-Income Home Energy Assistance Program.

Participation in the Remote-Reconnect program increased again in 2024 while overall LIHEAP customers decreased as well as LIHEAP customers participating in the remote-reconnect program. Last year, MP had forecast that 2024 net program costs would be $185,000,[104] so the actual 2024 net program costs of $67,000 are down significantly from 2023 and are also less than had been anticipated for the year. The Department asks MP to explain this difference between forecast and actual 2024 remote-reconnect program costs in its supplemental comments.

Beginning in October 2023, customers who opt out (without documentation of health reasons for opting out) of AMI will be charged $20 per month to cover the costs associated with providing and maintaining the old technology. Six customers submitted medical professional documentation and have had their AMI opt-out fees waived.[105]

Table 16b: Remote-Reconnect Comparison of Reconnections within 24 Hours[106]

	2021[107]	2022	2023	2024
Remote	200	600	1,102	1,448
Standard (Not Remote)	337	695	889	663
% of Reconnects within 24 hours that were Remote	37.24%	46.33%	55.35%	68.59%

Source: Minnesota Department of Commerce

Table 16a shows that the ratio of reconnections within 24 hours that were reconnected remotely has been increasing over the last four years, with most reconnections done remotely since 2023.

Reconnection timelines from 2021 to 2024 have fluctuated. Beginning in 2023, MP began providing the reconnections timelines from disconnect and from customer request to reconnect since the disconnection duration is significantly influenced by customer action.[108]

[104] Docket No. E015/M-24-29 Department Comments' Department Attachment 10 (Company Response to Department IR 8) (eDockets: 20246-208092-01) at PDF page 51 of 54.
[105] Report at 89. The opt-out fee waiver requires annual renewal of the health exemption.
[106] Report at 90.
[107] Note that the Pilot began in August 2021, so 2021's data is for a partial year.
[108] Report at 89.

Table 16c: Reconnection Timelines from Disconnect vs Customer Request[109]

All Customers	2023[110]	2024
Average Time to Reconnect from Disconnect		
Standard	17 Days, 12:48:44	25 Days, 2:50:03
Remote	6 Days, 22:23:08	10 Days, 0:30:23
Average Time to Reconnect from Request		
Standard	0 Days, 9:44:40	0 Days, 9:17:58
Remote	0 Days, 0:06:28	0 Days, 0:07:25

Source: Minnesota Department of Commerce

The average time to reconnect from disconnect increased in 2024 compared to 2023. However, the average time to reconnect from the customer's request to reconnect improved by 27 minutes while the time to reconnect remote customers increased by one minute but remained strong at approximately seven and a half minutes from request. For all customers, the average time from customer request to reconnection was approximately 9 hours and 17 minutes for standard meters and seven hours and 25 minutes for remote-capable meters. LIHEAP remote-capable customers reconnect the fastest reported reconnection times from customer request, at just under 40 seconds.[111]

F.3. Docket No. E015/M-20-404 Order dated December 18, 2020

F.3.1. ***Ordering paragraph 5:*** *The utilities must file the reliability for feeders with grid modernization investments such as Advanced Metering Infrastructure (AMI) or Fault Location Isolation and Service Restoration (FLISR) to the historic five-year average reliability for the same feeders before modernization investments.*

Report Table 4 on page 29 provides the reliability metrics for feeders with grid modernization investment. Generally, SAIDI has improved since installation of grid modernization technology.

In addition to this table and narrative, the Company also provided an overview of reliability cost on pages 22 – 25 of its Report. This overview shows SAIDI and SAIFI with capital costs and MP states that the increased capital spending over the last five years reflects the Company's commitment to improve the reliability of its system through strategic investments.[112]

[109] Ibid.
[110] Docket No. E015/M-24-29 Department Comments' Department Attachment 10 (Company Response to Department IR 8) (eDockets: 20246-208092-01) at PDF page 52 of 54.
[111] Report at 89.
[112] Report at 22.

F.4. Docket No. E015/M-21-230 Order dated December 2, 2021

*F.4.1. **Ordering paragraph 2 and 3**: Required MP to provide percentage uptime and error rate percentage information beginning in April 2023 and for the next three reporting cycles, to build baselines for web-based service metrics.*

MP provided uptime and error rate percentage metrics for its electronic utility-customer interactive platforms in Tables 35-37 of its filing, reproduced here:

Table 17a: MP's Uptime Percentage (2024)[113]

Site	% Uptime	# of Outages	Downtime (Minutes)
General Website – MN Power.com	99.99%	35	59
MyAccount	99.99%	4	4
Outage Reporting Form	100.00%	1	4
Outage Map	100.00%	1	6
Payment Service through Speedpay.com	100.00%	No Data	No Data

Source: Minnesota Department of Commerce

The 2024 uptime data provided reflects consistently strong performance, and an improvement from 2023 in terms of downtime. MP again provided the percent uptime for its online payment service through Speedpay.com, but it does not appear to have included the error rate percentage information required under Order paragraph 2. The Department requests MP provide this information in its supplemental filing.

This year represents the third reporting cycle of web-based service metrics. The Department provides the three-year averages (2022 – 2024 performance years' data) to provide MP's baseline performance below. The Company's worst performance year during the reporting period was 2023.

[113] Report at 81-82.

Table 17b: MP's Average Uptime Percentage (2022-2024)[114]

Site	% Uptime	# of Outages	Downtime (Minutes)
General Website – MN Power.com	99.97%	61	131
MyAccount	99.99%	8	18
Outage Reporting Form	100.00%	8	10
Outage Map	100.00%	0	2
Payment Service through Speedpay.com[115]	99.97%	No Data	No Data

Source: Minnesota Department of Commerce

The Department recommends the Commission require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.

F.4.2. ***Ordering paragraph 3 and 4:*** *Required MP to continue providing defined utility-customer interaction data.*

The Company provided the required information on pages 67 – 70 of its Annual Report. The Department summarizes this information along with the 2021 – 2023 averages below.

Table 18: MP Page Views and App Installations[116]

Description	3-Yr Average (2021-2023)	2024
Website	1,715,308	1,725,089
MyAccount	718,488	613,265
Mobile App Installations	8,333	8,241
Facebook	24,813	47,812
Instagram	11,305	1,322
LinkedIn	14,000[117]	8,609

Source: Minnesota Department of Commerce

Minnesota Power also provided a summary of emails received through its customerservice@mnpower.ocm email address with categorization of email subject. Generally, MP has been receiving more emails each year than the previous years. In 2024, MP received 19,426 emails[118] compared to the three-year average (2021-2023) of 16,771 emails. The highest frequency email categories since 2020 have been: Fuel Assistance, Miscellaneous, and Billing Inquiry.[119]

[114] Data for 2024 retrieved from Report at 81-82. Prior years' data retrieved from earlier SRSQ filings.
[115] The average uptime level reported for Speedpay.com is based on the "internet" reporting MP provided for this service.
[116] Report at Table 33, page 79.
[117] LinkedIn data was not provided in 2021 and 2022, so the 2023 value is reported here rather than a three-year average.
[118] Report at Table 34, page 80.
[119] Report at 81. In 2021, "Not Specified" was the second most frequent email category.

F.4.3. ***Ordering paragraph 7:*** *Required MP to file public facing summaries with its annual SRSQ report. This requirement was later updated to require the SRSQ summary be published on the website after a single click away from the home page.*[120]

The Company included its 2024 public-facing summary on pages 14-15 of its 2024 Report. The summary is published on MP's website, one-click from the homepage at https://minnesotapower.blob.core.windows.net/content/Content/Documents/Company/Transmission/SRSQ_2024.pdf. To access the summary from the home page, the user must scroll to the bottom of the page and select the 2024 Safety, Reliability, and Service Quality Report link under the Energy Portfolio header.

F.5. Docket No. E015/M-22-163 Order dated January 18, 2023

Eliminated the standalone Annual Summary of Customer Complaints docket (YY-13) and required utilities to include customer complaint data from Minnesota Rules 7826.2000 in the Annual Service Quality Reports.

F.6. Docket No. E015/M-24-29 Order dated January 13, 2025

F.6.1. ***Ordering paragraph 2:*** *Set MP's 2024 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set MP's work center reliability standards at the IEEE benchmarking 2nd quartile for small utilities. Required MP to file a supplement to its' 2024 SRSQ report 30 days after IEEE publishes its benchmarking results.*

The Company acknowledged that it will provide a supplemental filing after the IEEE results are published this fall.

F.6.2. ***Ordering paragraphs 8, 9, and 10:*** *Required MP to include a discussion on alternative approaches to reliability standard setting in its 2024 SRSQ report including addressing IEEE reporting's sample size and data exclusion challenges and a discussion of EIA 861 data.*

The Company provided this information, and the Department provided its discussion and recommendation on alternative approaches to reliability standard setting in section D. above.

F.6.3. ***Ordering paragraph 12:*** *Required MP to include a discussion on the impact of its new OMS on reporting*

[120] *In the Matter of MP's 2021 annual SRSQ and Proposed Reliability Standards for 2022*, PUC, Order, November 9, 2022, Docket No. E015/M-22-163, (eDockets: 202211-190522-01), at order point 8.

metrics and a comparison of data from its existing OMS system and its new OMS data in its 2024 SRSQ report.

MP included this discussion on pages 68-69 of its report and indicated that it did not anticipate any significant impacts to reliability data due to the new OMS. The new OMS went live on December 3, 2024. The Company noted that the system provides improved data for MP's operational needs and an improved user interface.

The Department recommends that the Commission require MP to include reliability performance data from both its old and new Outage Management System (OMS), if available, in next year's report.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the Report, MP's responses to Department Information Requests, and information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

B. ANNUAL SAFETY REPORT

- B.2. The Department recommends that the Commission accept MP's annual safety report.

C. ANNUAL RELIABILITY REPORT

- C.10. The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that MP will file later in 2025.

D. RELIABILITY STANDARDS FOR 2025

- D.4. The Department recommends benchmarking MP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for MP's statewide system against IEEE's medium-sized utilities' data and MP's work centers against IEEE's small-sized utilities' data.
- D.4 If IEEE does not report utility-sized response results in the future, the Department recommends that the IEEE overall results for that year be used instead of relying on the utility-size results for the benchmark calculations.

E. ANNUAL SERVICE QUALITY REPORT

- E.8. The Department recommends that the Commission accept MP's annual service quality report pending receipt of the requested detail in its Supplemental Filing:
    - Explain the difference between its forecast and actual 2024 remote-reconnect program costs, as noted in section F.2.
    - Provide the missing payment services error rate percentage as noted in section F.4.1.

F. COMPLIANCE WITH PERTINENT COMMISSION ORDERS

- F.4.1. The Department recommends that the Commission require MP to continue reporting uptime of utility-customer interactive platforms to maintain transparency on performance.
- F.6.3. The Department recommends that the Commission require MP to include reliability performance data from both its old and new Outage Management System (OMS), if available, in next year's report.

Attachments

Attachment 1	Department IR 4 – Safety Reporting
Attachment 2	Department IR 5 – 2024 Damage Claims
Attachment 3	Department IR 11 – Preventative Maintenance Program
Attachment 4	Department IR 13 – Bulk Power Supply Interruptions
Attachment 5	Department IR 7 – Staffing – FTEs, GIS Reporting, Contractor vs staff
Attachment 6	Department IR 8 – Staffing – increases over time, future plans
Attachment 7	Department IR 6 – Reliability benchmarking, email confirmation
Attachment 8	Department IR 9 – Complaints – no control
Attachment 9	Attachment B from Docket No. E015/M-19-254 Order dated January 28, 2020

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
Requested From: Analeisha Vang, MP Regulatory Compliance Specialist Date of Request: 5/9/2025
Type of Inquiry: General Response Due: 5/19/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Mary Beth Kehrwald
Email Address(es): marybeth.kehrwald@state.mn.us
Phone Number(s): 651-539-1808

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: **4**
Topic: Safety Reporting
Reference(s): Petition's Table 7 – 2024 OSHA Reportable Injuries (p. 42)

Request (Supplemental):

In the IR response, you noted that MP experienced a total of 6 lost-time injuries in 2024 and referenced 133 days of lost time (131 days for lost time injuries + 2 lost days for a vehicle accident). MP's SRSQ Report, Table 7, MP reported 8 cases of OSHA reportable incidents which resulted in 114 days away from work.

Can you please address this discrepancy in case count and days away from work?

Response (Supplemental):

Minnesota Power (or the "Company") has verified that the 8 cases for the '*Total number of cases with days away from work*' and 114 '*Days away from work*' categories listed in Table 7 of Minnesota Power's 2024 Safety, Reliability and Service Quality Report ("SRSQ Report") are accurate. The discrepancy in numbers reported is due to the methodology used in tracking lost-time days as described below:

- **Case Count**: The Company's initial response to DOC IR 4 reported a total of 6 cases and 133 lost-time days (131 days associated with lost-time injuries and 2 days due to a vehicle accident). The number provided in the IR response was the total number of cases for the injury classifications of soreness/pain and sprains, reflecting a predominant trend. The two additional OSHA-reported cases were for other injury classifications and should have been included in the total count.
- **Days Away from Work**: The Company's initial response to DOC IR 4 reported 133 lost-time days. This discrepancy occurred because Perillon, the environmental health and safety management system used by Minnesota Power, continues counting lost-time days beyond the end of the calendar year. Employees

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To be completed by responder

Response Date: June 6, 2025
Response by: Harper Brickson, Manager - Safety & Industrial Hygiene
Email Address: hbrickson@allete.com
Phone Number: (218) 355-3101

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
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Assigned Analyst(s): Mary Beth Kehrwald
Email Address(es): marybeth.kehrwald@state.mn.us
Phone Number(s): 651-539-1808

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experiencing lost-time injuries that extend into the new calendar year continue accruing lost-time days (no reset occurs on January 1), and that accrual amount is reflected in Perillon. For the SRSQ Report, the days away from work in 2024 were correctly calculated; however, that was inadvertently missed for the IR response.

One supplemental note to provide context regarding the lost-time days for 2024. A single employee incident accounted for 63% (72 of 114 days) of total lost-time days, significantly influencing overall lost-time figures.

Minnesota Power apologizes for incongruity between what was provided in the SRSQ Report and the initial response to DOC IR 4. The Company will make every effort to ensure clear alignment between internally tracked lost-time days and OSHA-reported figures to prevent future inconsistencies in reporting.

****

Request:

A. The OSHA Reporting Data shows an increase in total number of cases with days away from work in 2024 compared to the 2014-2023 ten-year average of 5.
   a. Please provide an explanation for the increase.
   b. Describe what MP is doing to try to reduce the frequency and severity of safety reporting cases.
B. The average days of job transfer or restriction per case was up significantly in 2024 (155.25)[1] compared to the recent ten-year average (75.6).[2] Please provide an explanation for this increase.

[1] Calculated based on MP's reported 621 days of job transfer or restriction divided by 4 cases with job transfer or restriction).
[2] Ten-year average is based on data provided for 2014-2023 in prior SRSQ reports.

To be completed by responder

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Assigned Analyst(s): Mary Beth Kehrwald
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Phone Number(s): 651-539-1808

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Response:

A.

a. Last year, Minnesota Power experienced a total of 6 lost time injuries. Notably, one employee's injury accounted for 55% (72 of 131 days) of the lost time. This injury was a re-aggravation of a long-standing medical condition, which necessitated medical care beyond self-care. Consequently, the employee had to miss a significant number of workdays due to surgery and the healing process required for recovery. Additionally, another incident resulted in 2 lost days for an employee involved in a non-preventable, no-fault motor vehicle accident.

b. Minnesota Power is committed to enhancing workplace safety and reducing the frequency and severity of safety reporting cases through several key initiatives:

- Early Reporting: Minnesota Power has significantly improved the rate of employees reporting workplace injuries, increasing from 60% in Q1 of 2024 to 100% in Q1 of 2025. This ensures timely intervention and support.
- Movement Health: To help prevent such injuries and prepare our bodies for work, whether in the office or the field, Minnesota Power provides a movement health program called ALLETE Moves. This program encourages employees to participate in Daily 5's of movement, which can be whole body or targeted exercises as they choose. The goal is to prevent soft tissue injuries and promote overall physical well-being.
- Industrial Athlete Program: In partnership with our Injury Care Management provider, Minnesota Power offers this program to employees who have experienced musculoskeletal injuries. The program provides additional and ongoing support to help these employees recover effectively.
- High Energy Hazard Awareness: This initiative aims to increase awareness of high-risk hazards in the workplace, helping employees recognize and mitigate potential dangers.

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- Safety Classification and Learning Model: By implementing this model, Minnesota Power can identify the appropriate level of learning required and establish a defined timeline to address and correct hazards. This structured approach is expected to positively impact the frequency and severity of safety reporting cases.
- These efforts reflect Minnesota Power's dedication to creating a safer work environment and supporting their employees' well-being.

B. Additionally, this same injury was a contributing factor to the increase in restricted workdays as it was 66% (431 of our 657) of our restricted days. Due to the long period of time the employee was on restricted duty until they were able to return to full duty, the overall number of restricted workdays increased significantly.

To be completed by responder

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Email Address: hbrickson@allete.com
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Request Number: **5**
Topic: 2024 Damage Claims
Reference(s): Petition, Table 8 (p. 43-44)

Request:

A. Table 8 shows that approximately 49% of the damage claims in 2024 were for Crop Damage – ND. Please provide a description of these claims and if they were preventable.
B. Please identify the claims in Table 8 that were the result of MP work procedure or MP staff actions.
C. Please identify the claims in Table 8 that were the result of MP resources that were improperly maintained.
D. Please describe actions that are being taken by MP to reduce the risk of future claims related to MP resources or actions.

Response:

A. In 2024, a sizeable weather event damaged Minnesota Power's direct current transmission line ("DC Line") structures in North Dakota and Minnesota. While completing the necessary structure replacements, Minnesota Power (or the "Company") caused crop damage and soil compaction, which decreases water infiltration for some landowners. Due to the location of the structures, none of these claims were preventable.

   Minnesota Power makes every effort to minimize the impact to landowner property; however, DC Line restoration requires the use of large equipment and an increase in the footprint due to the necessity to remove damaged/tipped over structures. Landowners are compensated at fair market value for damaged crops and soil compaction caused by the operation of large equipment and the temporary placement of structures on their land.

To be completed by responder

Response Date: May 30, 2025
Response by: Jodi Lumberg
Email Address: jlumberg@allete.com
Phone Number: (218) 355-3509

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
Requested From: Analeisha Vang, MP Regulatory Compliance Specialist Date of Request: 5/9/2025
Type of Inquiry: General Response Due: 5/19/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Mary Beth Kehrwald
Email Address(es): marybeth.kehrwald@state.mn.us
Phone Number(s): 651-539-1808

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B. Except for the vehicle claims, the remaining claims in Table 8 were the result of Minnesota Power work procedure or staff actions. The rental vehicle claims were caused by debris on the roadway.

C. None of the claims in Table 8 were the result of Minnesota Power resources being improperly maintained.

D. When an incident occurs, a detailed review is performed internally. Additionally, Minnesota Power has a proactive system in place called "Good Catch/Close Calls." If an employee notices something unusual or identifies a missed step in a process, they are encouraged to submit a ticket. These tickets are reviewed by both peers and management. Based on the findings, reviewing staff either communicate directly with the crews or works on developing a solution. This process helps raise awareness across the organization. Updates are shared via email and discussed during safety meetings to ensure everyone stays informed.

On an annual basis, Minnesota Power provides the following: Journeyman training, Apprentice training, block training on a variety of subjects, and MSHA (Mine Safety & Health Administration) training. Additionally, the Company utilizes its safety meetings and other breakout sessions to educate employees throughout the year.

To be completed by responder

Response Date: May 30, 2025
Response by: Jodi Lumberg
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Phone Number: (218) 355-3509

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
Requested From: Ana Vang, Minnesota Power Regulatory Compliance Specialist; Lori Hoyum
Date of Request: 5/21/2025
Type of Inquiry: General Response Due: 6/2/2025

SEND RESPONSE VIA EMAIL TO: Utility.Discovery@state.mn.us as well as the assigned analyst(s).
Assigned Analyst(s): Mary Beth Kehrwald
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Request Number:	**11**
Topic:	Preventative Maintenance (PM) Program
Reference(s):	Petition, p. 19-20

Request:

In Department Comments of Docket E015/M-23-75, Department Attachment A,[1] MP provided details on the Company's Preventative Maintenance (PM) program.

Please provide an update on the Preventative Maintenance program including PM frequency for MP's various asset types and other program changes since the details provided in Department Attachment A.

Response:

Minnesota Power continues to evaluate preventative maintenance practices through external sensing of other utilities' best practices, vendor recommendations, and reliability of current balance of plant. Minnesota Power uses a consultant to review groundline poles across the service territory on a ten-year cycle. Minnesota Power test operates distribution switches on a 3-year cycle (currently in year 3 of first cycle). Electronic type distribution reclosers have batteries replaced every 2 years, and hydraulic type reclosers are removed for maintenance or replaced on a 7-year cycle. Minnesota Power continues to evaluate new technologies and maintenance practices to create a more reliable system.

[1] *In the Matter of Minnesota Power's 2022 Annual Safety, Reliability, and Service Quality Report*, Department Comments' Attachment A, June 16, 2023, (eDockets: 2023-196628-01) at PDF page 41-43 of 52.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
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Date of Request: 5/21/2025
Type of Inquiry: General Response Due: 6/2/2025

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Request Number: **13**
Topic: Bulk Power Supply Interruptions
Reference(s): Petition's Table 14 and Appendix A

Request:

The Petition's Table 14 identifies five bulk power supply interruptions. Three of these interruptions don't appear to be documented in Appendix A's documentation for major service interruptions:

- 198 Line (Bear Creek) on May 10, 2024;
- 59 Line (Mahtowa-Sandstone) on May 10, 2024; and
- 23 Line (Bear Creek) on July 8, 2024.

A. Please describe what determines when an event is identified as (1) a bulk power supply interruption and (2) a major service interruption.
B. Describe how many customers were impacted by each bulk power supply interruption which is not documented in Appendix A.

Response:

A. (1) A "bulk power supply interruption" is currently defined as an interruption of a distribution feeder that is greater or equal to 46kv.
(2) A major service interruption (*aka Appendix A reporting criteria*) is an outage on a feeder of any voltage class that meets all of the following criteria: Feeder lockout, greater than 500 customers affected, no customer restored before the 60-minute mark.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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

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Date of Request: 5/21/2025
Type of Inquiry: General Response Due: 6/2/2025

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B. 198 Line and 59 Line are listed separately but were both part of the same outage caused by one tree that took out both feeders. 198 Line was restored before the 60-minute mark, so this outage didn't meet the major service interruption criteria (reporting requirements).

- 198 Line (Bear Creek) on May 10, 2024.
  - Customer Total: 2,442
  - 198 Line feeds Hinckley West 461 and 462, Hinckley East 463 and Sandstone 452

- 59 Line (Mahtowa-Sandstone) on May 10, 2024.
  - Customer Total: 2,404
  - 59 Line feeds Finlayson 6511, Barnum 6421, and Denham 6431

23 Line which feeds Askov 6521 was restored under the 60-minute mark, so this outage did not meet the major service interruption criteria (reporting requirements).

- 23 Line (Bear Creek) on July 8, 2024.
  - Customer Total: 737
  - 23 Line feeds Kerrick 6501 and Askov 6521

To be completed by responder

Response Date: 5/30/2025
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Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
Requested From: Analeisha Vang, MP Regulatory Compliance Specialist Date of Request: 5/9/2025
Type of Inquiry: General Response Due: 5/19/2025

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Request Number: **7**
Topic: Staffing
Reference(s): Petition, p. 64-65

Request:

Table 19 indicates that it shows the employee count be work center. It shows that all Engineering Support – GIS staff are now considered common staff rather than attributed to specific work centers. It also shows a new category of contractors, engineering, which was not reported last year.

A. Please confirm that Table 19 reported the full-time equivalent (FTE) position counts (rather than individual employee count) as required by Minnesota Rules 7826.0500 Subpart 1. J. If it reported employee counts, provide an updated table reporting FTE counts for 2024 and 2023 (if last year's docket also reported employee counts rather than FTE counts).
B. Please explain the shift from Engineering Support – GIS staff being reported via work center in prior years to common staff in 2024.
C. Please provide an explanation for the need for engineering contractors and how their work differs from engineering support staff employed by MP.

Response:

A. The employee counts reported in Table 15 for 2023 and in Table 19 for 2024 also represent the full-time equivalent counts as required by Minnesota Rules 7826.0500 Subpart 1.J.

B. In the past, the GIS team had employees located in local service centers even though they supported the entire company. Most of the GIS employees are located in the Duluth area now and support the entire company. A change was made to reflect this shift.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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Type of Inquiry: General Response Due: 5/19/2025

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C. With Minnesota Power's growing budgets tied to asset renewal, grid modernization, and reliability improvements, contract engineers have been hired to assist with larger projects across the company. Many of the local engineering support staff are focused on asset renewal and break-in work such as road relocations or customer requests. Our contract engineers were hired to focus on programs such as strategic undergrounding and grid modernization projects.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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Request Number: **8**
Topic: Staffing
Reference(s): Petition, p. 64-65

Request:

MP's reported staff and contractor count has increased 45% from 337.5 in 2020 to 491 in 2024.

A. Please provide a brief explanation for this increase in staffing, including addressing:
   a. Projects that are driving the need for increased staffing as well as if these needs are temporary or long-term;
   b. How technology is affecting the Company's ability to do its work and staff workload;
   c. Other relevant factors.
B. Please indicate MP's anticipated staffing needs/changes planned in the next five years.

Response:

A. Staffing has increased across the organization mostly with contract employees (engineers, vegetation management, and line contractors) to assist with the growing budgets tied to asset renewal, reliability, and grid modernization projects. Technology is not the driving factor for the increased staffing; more work is being designed and completed at an accelerated pace in order to upgrade aging infrastructure, modernize the grid, and improve reliability. In addition, it has been difficult to hire certain positions across the organization such that contract employees were hired to cover these key roles as we eventually aim to fill these positions internally.
B. Minnesota Power does not anticipate significant staffing changes from current numbers to support distribution over the next five years. As key roles are hired internally, contract employees can be released.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
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Request Number: **6**
Topic: Reliability Benchmarking
Reference(s): Petition, pages 47 - 54

Request:

A. Please clarify what period MP is proposing the five-year average IEEE benchmarking be based on in terms of IEEE performance years relative to MP's SRSQ performance year (e.g. compare MP's 2024 reliability performance, included in the filing dated 4/1/2025, against IEEE performance years 2019 – 2023 (published by IEEE in Q3 2020 – Q3 2024)).
   a. Please provide the IEEE small and medium-sized 2nd quartile data for each of these IEEE performance years.
   b. Please describe why it's beneficial to compare MP's annual reliability performance against a five-year average performance benchmark when averages may dilute the ability to contextualize performance against the year's weather events, especially if the average excludes the matching IEEE performance year to MP's performance year.

B. In IEEE's Q3 2024 report of 2023 performance benchmarks, IEEE noted that IEEE Small quartiles were too small to be statistically significant. How does MP propose setting the metrics for work centers in years when IEEE data is not statistically significant?

C. MP states that the national trend for SAIDI is increasing and SAIFI is slightly decreasing (Petition, p. 52) while stating that MP's performance for both is stable (p. 49).
   a. Please provide a brief explanation for the national trend and MP's actual performance.
   b. If the national trend in SAIDI is worsening, does MP anticipate its performance trend worsening if the utility is benchmarked against national averages rather than its own performance (will the utility's goal change)?

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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

Docket Number: E015/M-25-29 ☐Nonpublic ☒Public
Requested From: Analeisha Vang, MP Regulatory Compliance Specialist Date of Request: 5/9/2025
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Response:

A. a. Below is the requested IEEE information for 2nd quartile data for medium and small size utilities.

Medium Size Utility	IEEE SAIDI	IEEE SAIFI	IEEE CAIDI	# of Participants
2023	121	1.00	139	40
2022	143	1.11	134	42
2021	136	1.08	126	45
2020	128	0.98	123	49
2019	140	1.17	124	48
Averages	133.60	1.07	129.2	*44.8*
Small Size Utility	**IEEE SAIDI**	**IEEE SAIFI**	**IEEE CAIDI**	**# of Participants**
2023	180	1.11	132	4
2022	193	1.39	125	4
2021	201	1.46	89	5
2020	187	1.42	119	4
2019	103	1.32	71	6
Averages	172.80	1.34	107.2	*4.6*

b. Minnesota Power (or the "Company") proposes comparing its performance to the 5-year average of IEEE benchmark 2nd quartile results for Medium and Small utilities respectively. The 5-year average for 2024 would include 2019-2023 IEEE results. The Company feels that this trend-based approach will eliminate the need to submit a supplemental filing while providing a better approach to reliability goal setting.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

Minnesota Department of Commerce
85 7th Place East | Suite 280 | St. Paul, MN 55101
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Minnesota Power is proposing a transition to move away from matching data on a year-by-year approach to a trend-based model. Reliability varies year over year and across the country, mostly affected by weather patterns that can significantly change how a utility performs depending on where they are serving customers. For example, in 2024, the Company experienced zero major event excluded days. The 2024 IEEE benchmark results from peers across the nation will likely all have experienced more severe weather events over the same time. However, in 2022, Minnesota Power experienced 8 major events excluding days. This was well above the average of peer utilities who typically experience 2-3 major event days per year using the IEEE 2.5 beta method. This volatility provides a constantly moving target for reliability goal setting. With the trend-based approach, the 5-year averages smooth out some of this volatility. The results will better demonstrate if Minnesota Power is performing above the trend of its peers.

Further, Minnesota Power's policies and initiatives are always being refined as the utility experiences change. Many of the Company's programs, such as asset management and vegetation maintenance, take 7-10 years to complete one cycle through the system. Reliability improvement projects are often a multi-year endeavor. These projects all go through permitting, design, supply chain delays, and construction that may take multiple seasons or years to complete. Minnesota Power feels that a trend-based approach aligns more closely with the lifecycle of its efforts.

B. Minnesota Power proposes a 5-year average of IEEE Small utility 2nd quartile data. If there is a year where not enough utilities participated, that year could be thrown out of the average. By using a 5-year average, even with less participants, there are enough participants over a longer time frame to create significant statistical results.

C. a. Minnesota Power does not have specific data to cite exact causes for the national trends. Generally, there seems to be more frequent and severe weather. There has also been a recent awareness of wildfires

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To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

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and utilities across the nation are changing strategies to avoid utility caused ignitions, with some utilities taking planned power outages through Public Safety Power Shutoff (PSPS).

Over the last 5 years Minnesota Power's reliability has improved on average for both SAIDI and SAIFI. Minnesota Power is confident that its efforts in asset management, strategic undergrounding, and grid modernization are effectively keeping pace with these external impacts. As more of the Company's reliability improvement projects and grid modernization efforts roll out, continued improvements in SAIDI and SAIFI is expected.

b. Minnesota Power expects that over the next 5-10 years, the Company will meet or exceed its reliability goals and expects to trend better than the national average.

To be completed by responder

Response Date: 5/30/2025
Response by: Eric Clement, Manager – T&D Grid Modernization
Email Address: eclement@mnpower.com
Phone Number: 218-471-4009

Kehrwald, Mary Beth (She/Her/Hers) (COMM)

From: Eric Clement (MP) <eclement@mnpower.com>
Sent: Wednesday, June 4, 2025 7:32 AM
To: Kehrwald, Mary Beth (She/Her/Hers) (COMM)
Cc: Lori Hoyum (MP); Tiana Heger (MP)
Subject: RE: [EXTERNAL MAIL] Docket 25-29_IR 6 Response, 2024 Performance Year Benchmarks

Follow Up Flag: Follow up
Flag Status: Completed

Sorry for the confusion Mary Beth, your assumptions are correct.

- 2024 performance year goals are already set and MP will submit a supplemental filing when the IEEE results for the 2024 performance year data are published (anticipated in Q3 2025).
- The discussion on future benchmarking impacts the recommendations for the 2025 performance year. MP's SRSQ report for the 2025 performance year is anticipated to be filed on April 1, 2026.
    - For the 2025 performance year, MP proposes to benchmark the company's performance against IEEE Benchmark Year 2021-2025 Results for 2020 – 2024 Data (phrasing is taken from IEEE's title slides for results).

Please reach out with any other questions.

Thanks, Eric

From: Kehrwald, Mary Beth (She/Her/Hers) (COMM) <MaryBeth.Kehrwald@state.mn.us>
Sent: Tuesday, June 3, 2025 11:46 AM
To: Eric Clement (MP) <eclement@mnpower.com>
Cc: Lori Hoyum (MP) <lhoyum@mnpower.com>; Tiana Heger (MP) <theger@mnpower.com>
Subject: [EXTERNAL MAIL] Docket 25-29_IR 6 Response, 2024 Performance Year Benchmarks

Hi Eric,

Thanks for providing the response to the Department's IR 6 in Docket No. 25-29. This discussion can get a little complicated given the performance years versus report years, so I wanted to follow up for clarification.

In the Petition, MP stated proposed 2024 goals based on MP's proposed five-year rolling average approach on page 112 of the petition; however, the PUC Order from last year's report set the 2024 performance year benchmarks using the same methodology of past reports (Order Point 2), which would mean that the 2024 performance year is benchmarked against the IEEE data that will be reported in Q3 2025 (as indicated on page 48 of the petition).

I wanted to check in to make sure that we are in alignment on our understanding:

- 2024 performance year goals are already set and MP will submit a supplemental filing when the IEEE results for the 2024 performance year data are published (anticipated in Q3 2025).
- The discussion on future benchmarking impacts the recommendations for the 2025 performance year. MP's SRSQ report for the 2025 performance year is anticipated to be filed on April 1, 2026.
    - For the 2025 performance year, MP proposes to benchmark the company's performance against IEEE Benchmark Year 2021-2025 Results for 2020 – 2024 Data (phrasing is taken from IEEE's title slides for results).

Please reply to confirm. Thanks!

Mary Beth Kehrwald
Public Utilities Financial Analyst
651-539-1808
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

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Request Number: **9**
Topic: Complaints – No Control
Reference(s): Petition, Table 49, p. 108

Request:

MP indicated that 80% of complaints were not in the utility's control in 2024. The five-year average from 2019 – 2023 was for 60% of complaints to be outside of the utility's control.

Please provide an explanation for this increase in complaints that were outside of the utility's control.

Response:

The observed increase, with 80% of complaints in 2024 being outside of the utility's control compared to the five-year average of percentages of approximately 60% that the Department has identified, is primarily attributable to advancements in meter data accuracy through a full Advanced Metering Infrastructure ("AMI") rollout as well as increased utilization of the MyAccount platform by our Call Center Representatives and customers. These tools have significantly enhanced our ability to analyze and address customer concerns about usage and related bills.

A substantial portion of complaints are related to perceived high bills and related requests for meter testing. In many cases, the improved data from our advanced meters and the self-service tools available through MyAccount allowed us to determine that the issues were related to usage on the customer's side of the meter. As such, these matters were outside of Minnesota Power's control to resolve and therefore were resolved utilizing the No Control resolution type. We remain committed to providing our customers with the tools and resources needed to better understand and manage their energy usage. The improvements in data accuracy and accessibility have not only helped clarify the source of these complaints but also empowered customers to take proactive steps in managing their energy consumption through increased transparency regarding usage amounts and time periods.

To be completed by responder

Response Date: 05/30/2025
Response by: Tina S. Koecher
Email Address: tkoecher@mnpower.com
Phone Number: 218-355-3805

Attachment B: Updated Annual Reporting Requirements

1. Non-normalized SAIDI, SAIFI, and CAIDI values
2. SAIDI, SAIFI, and CAIDI, MAIFI, CEMI, and CELI normalized values calculated using the IEEE 1366 Standard.
3. MAIFI – normalized and non-normalized.
4. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.
5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
6. CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.
7. The longest experienced interruption by any one customer (or feeder, if customer level is not available).
8. A breakdown of field versus office staff as required Minn. Rules 7826.0500 Subp. 1, J, including separate information on the number of contractors for each work center.
9. Estimated restoration time accuracy, using the following windows:
    a. Within -90 minutes to 0 of estimated restoration time
    b. Within 0 to +30 minutes of estimated restoration time
10. IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI from the IEEE benchmarking working group
11. Performance by customer class:

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized					
	Normalized					
Commercial	Non-normalized					
	Normalized					
Industrial	Non-normalized					
	Normalized					

If reporting by class is not yet possible, an explanation of when the utility will have this capability.

12. Causes of sustained customer outages, by work center.

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-25-29

Dated this **11th** day of **July 2025**

/s/Sharon Ferguson

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