



ENERGY
CENTS
COALITION

Commit Energy Now To Survive

September 10, 2018

Mr. Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: In the Matter of Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report

MPUC Docket No. E-015/M-18-250

Dear Mr. Wolf:

Enclosed please find the Energy CENTS Coalition's Reply Comments in the above-captioned matter. An Affidavit of Service is also enclosed.

If you have any questions, please contact me at 651-774-9010.

Sincerely,

Pam Marshall

Pam Marshall

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION
121 Seventh Place East, Suite 350
St. Paul, MN 55101-21

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuenger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Minnesota Power’s
2018 Safety, Reliability and Service Quality
Standards Report

**ENERGY CENTS COALITION
REPLY COMMENTS**

DOCKET NO. E015/M-18-250

September 10, 2018

I. INTRODUCTION

The Energy CENTS Coalition (ECC) appreciates the opportunity to provide additional comments in the matter of Minnesota Power’s (“MP” or “the Company”) 2018 Safety, Reliability and Service Quality Standards Report (SRSQ). In these comments, ECC will respond to the Company’s Reply Comments dated August 20, 2018. ECC contends that the Company has not adequately addressed ECC’s concerns about several of the Company’s customer service practices and renews the recommendation that the Commission further investigate these practices. ECC continues to recommend that the Commission reject the Company’s proposed Remote Reconnection Pilot.

Before addressing the specific issues involved in this docket, however, ECC believes it is important that the Commission understand the challenge presented to parties, particularly those with limited resources, when a Company ignores deadlines for Information Requests. In this

case, ECC asked MP to respond to 16 requests for information. ECC provided those requests to the Company on May 9, 2018 and the Company's responses were due by May 21, 2018. ECC received two of those responses on May 31, 2018 (seven working days late) and one of the responses on June 5, 2018 (10 working days late). The first extension that the Commission granted for Initial Comments was June 1, 2018 and ECC had anticipated filing comments on that date. If additional extensions had not been granted, ECC would have had one day to incorporate two of the information requests and would have received one of the Company's responses after the comment deadline passed. ECC respectfully requests that the Commission direct Minnesota Power to provide responses to Information Requests in a timely manner.

Minnesota Power asserts that ECC's allegations are "unfounded" and "unsubstantiated." On the contrary, ECC's concerns are based only on information obtained from the Company and, in every instance, the Company either admits their non-compliance with Minnesota's utility reporting statutes, or does not explain the significant discrepancies in reported numbers, or ignores the increase in the number and duration of service disconnections, or provides specious interpretations of Minnesota utility consumer protection statutes in order to justify their unreasonable practices. As discussed further below, the Company's explanation or "evidence" does not counter any of ECC's concerns, including:

- 1) The Company asserts that the reported number of customers reconnected within 24 hours (from 29.6% to 73.37% in 2015 and from 11% to 51.29% in 2016) is due to counting service disconnections in the "field" as opposed to counting disconnections when "completed in the system." But, these numbers, by definition, would not vary enough (if at all) to explain the dramatic difference between the initial and "corrected" number of customers reconnected to service within 24 hours. The Company argues that no disconnections took place in two months of 2015 and, "therefore, using 2015 as a benchmark ...is not advisable" MP at 10. Obviously, however, the *number* of disconnections would not affect the *percentage* of those reconnected within 24 hours.

The Company's historical numbers of customers reconnected within 24 hours also cause ECC to question those "corrected" numbers. ECC questions the 2017 number

as well because service disconnections *increased* 32.9% in 2017 while the amount of LIHEAP crisis funding *decreased* by 50%.

	Percentage reconnected within 24 hours	
2013	35.4%	
2014	24.5%	
2015	29.6% (original)	73.37% (“corrected”)
2016	11% (original)	51.29% (“corrected”)
2017	48.1%	

- 2) Minn. Stat. § 216B.098 requires utilities to offer payment arrangements to customers in arrears. By definition, disconnected customers are in arrears and ECC believes the intent of this statute is to offer arrangements to customers in order to re-establish service. If ECC’s interpretation is wrong, then the increase in the number of MP service disconnections (32.9% from 2016 to 2017), the increase in the duration of service disconnections (283 to 295 days) and the increase in the average number of days customers are disconnected (21.1 to 24 days) will continue.
- 3) The Company states that “the timing [of Cold Weather Rule and service disconnection reports] was not in alignment with statutory obligations” MP at 11. In 22 weeks from January – March 31, 2017 and from October 15 – December 31, 2017, the Company failed to file required weekly reports. Ten of those weekly reports were filed nearly six months late. Five monthly reports in 2017 were filed five months late, one was filed six months late and three were filed three months late. Both the Company’s characterization of *heat-affected, winter electric service disconnections* as a problem of “alignment” and their defense that they “did report the information to the Commission ...since determining *the timing issue*” undermine the significant violation of the reporting statutes (MP at 11, emphasis added).
- 4) The Company’s “redesigned” reporting does not explain why the numbers of service disconnections reported in the SRSQ and the CWR reports are significantly different. This difference leads ECC to question the accuracy of any of the reported numbers.
- 5) Minnesota Power states that the monthly CWR reports for November and December were filed on January 29, 2018. In other words, in violation of statute, the November report was still not filed within 45 days after the last day of the month for which data is reported. The Company further states that the SRSQ redesign “began” in January 2018, MP at 11. Unless the redesign was *completed* in January 2018, it is unclear how the 2017 November and December reports could have “used the new consistent reporting design shared by CWR and SRSQ reports,” MP at 11. Even less clear is why the required weekly CWR reports for November and December 2017 were not submitted until **March 28, 2018**. January and February 2018 weekly reports were filed March 28, 2018 and March and April 2018 reports were filed May 14, 2018.¹ The Company continues to violate the reporting statutes.

¹ Docket 08-02.

- 6) The number of MP customers receiving LIHEAP in 2017 was 9,966 or 8.4% of MP's residential customer class. Yet, in 2017, LIHEAP customers represented nearly 34% (33.9%) of all disconnected customers, ECC Initial Comments at Schedules 6 and 7.
- 7) The Company states that "there may be a benefit to further increasing targeted CIP outreach to low income households who have struggled with their electric bills or who have the highest electric usage," MP at 13. ECC believes that there is definitely a benefit to target CIP resources to those particular customers. However, ECC believes the Company should focus on providing measures that are most likely to reduce customers' electric bills, such as insulation, water heater replacement and electric appliance replacement. The Company agreed with ECC, at 12, that "including the customer participation number in both the Energy Analysis as well as the Energy Partners program ... would add transparency and reduce confusion" and, at 13, that they will begin tracking Energy Partners program installed measures "at the participant level."
- 8) In reference to the proposed Reconnect Pilot, Minnesota Power states at 14, that "there was no discrimination in the selection of pilot participants when meters were deployed. Objective criteria regarding disconnection activity was used." The Company also states that ECC's argument about targeting low income customers "makes little sense as there would be no change for a customer group." And, at 15, the Company states that pilot participants were "selected based on disconnection/reconnection frequency, not income...the current population of meters with this capability indicates that nearly 25% are non-LIHEAP." First, ECC's point about discrimination did not involve how the specific meters were deployed. ECC's point was that the Company has said that they:

identified 216 customers that have "frequent disconnections," roughly 150 of which are included in the proposed pilot. For the purposes of this pilot, frequent disconnection refers to a customer that has four or more total disconnections. Of the 216 customers that meet the "frequent disconnections" criteria, 39 have been on the CARE rate and 138 are renters.²

The point is the pilot is aimed at low-income customers. With this new information, 75% of the potential participants are LIHEAP customers. Of course, the remainder of the potential pilot customers, those that experience inability to pay and frequent service disconnections, are most likely low-income as well. Particularly given the increasing number and duration of service disconnections, the Company should be required to focus on offering sustainable payment arrangements to customers in order to avoid service disconnections in the first place.

² In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota, DOCKET NO. E-015/GR-16-664, Exhibit 200, Schedule 24 (Marshall, Direct Testimony).

II. ADDITIONAL RESPONSES TO MINNESOTA POWER'S COMMENTS

Service reconnections

Minnesota Power states that they require full payment and a reconnection fee in order to restore service to a disconnected customer and asserts that this practice complies with Minn. Stat. § 216B.098 (subd. 3). That Statute states:

A utility shall offer a payment agreement for the payment of arrears. Payment agreements must consider a customer's financial circumstances and any extenuating circumstances of the household. No additional service deposit may be charged as a consideration to continue service to a customer who has entered and is reasonably on time under an accepted payment agreement.

The Company argues that, because “there is no reference to reconnecting service,” that their practice is lawful. They further argue that “financial” and “extenuating circumstances” means “availability of (agency) funding, payment history, status of account balances ... credit history [and] that disconnection for nonpayment would be a consideration of financial circumstances,” MP at 4. As one of the advocacy organizations that worked to pass the payment agreement statute, ECC has a very different understanding of the meaning of “financial” and “extenuating circumstances.” To ECC, financial circumstances means the ability of the household to pay for utility service and extenuating circumstances means something that impacts that ability to pay—e.g. job loss, hospitalization, fewer household members to contribute financially, mental health issues, etc.

In fact, the Cold Weather Rule (CWR) statute reinforces ECC's interpretation of the payment agreement statute. Minn. Stat. § 216B.096 states, in part:

Subd 1.(e) "Household income" means the combined income, as defined in section 290A.03, subdivision 3, of all residents of the customer's household, computed on an annual basis. Household income does not include any amount received for energy assistance.

Subd 5. (a) During the cold weather period, a utility may not disconnect and must reconnect utility heating service of a customer whose household income is at or below 50 percent of the state median income if the customer enters into and makes reasonably timely payments under a mutually acceptable payment agreement with the utility that is based on the financial resources and circumstances of the household; provided that, a utility may not require a customer to pay more than ten percent of the household income toward current and past utility bills for utility heating service.

The CWR Statute explicitly excludes energy assistance (agency) funding as household income and links financial resources *to* the circumstances of the household. A common sense reading of the payment agreement statute does the same and does not invoke customer credit rating, account balance or customer payment history. At the very least, the payment agreement statute does not *prohibit* the Company from negotiating payment agreements in order to restore service to disconnected customers. But, Minnesota Power takes it a step further—not only do they refuse to negotiate arrangements to disconnected customers—they actually base the rationale for the requirement of full payment on a distorted interpretation of the relevant statute.

To further complicate this issue, the Company provides a table (MP at 8) showing the number of customers reconnected, during non-CWR months, by entering into a payment plan. At the same time, the Company states that they require full payment in order to restore service to disconnected customers in the non-CWR months. These apparently contradictory statements might be reconciled by the following two Company statements: 1) “there may be a combination of customer dollars and funds, as verified through an agency, to bring an account current for reconnection. Minnesota Power considers all of these factors when determining “payment in full”³; and, 2) the average monthly payment amount required “excludes payment plans with only one scheduled payment, as that scheduled payment is a payment in full.”⁴ It seems that the Company is counting payment in full as a satisfied “payment agreement.” In any case, ECC

³ ECC Initial Comments, Schedule 3.

⁴ ECC Initial Comments, Schedule 4.

respectfully requests that the Commission require Minnesota Power to explain why they say they require payment in full in order to restore customers during the non-CWR months and, at the same time, why they show the number of customers they claim to restore under a payment plan.

Even more confusing, the table (at 8) includes the number of LIHEAP accounts with a payment arrangement but, as the information below shows, those numbers *do not represent the number of LIHEAP customers restored to service by entering a payment arrangement*:

	LIHEAP customers restored by entering a payment plan ⁵	LIHEAP customers with a payment plan (MP at 8)
2017-01	28	231
2017-02	34	183
2017-03	41	238
2017-04	42	250
2017-05	38	298
2017-06	133	488
2017-07	69	343
2017-08	82	352
2017-09	65	286
2017-10	28	160
2017-11	29	188
2017-12	16	134

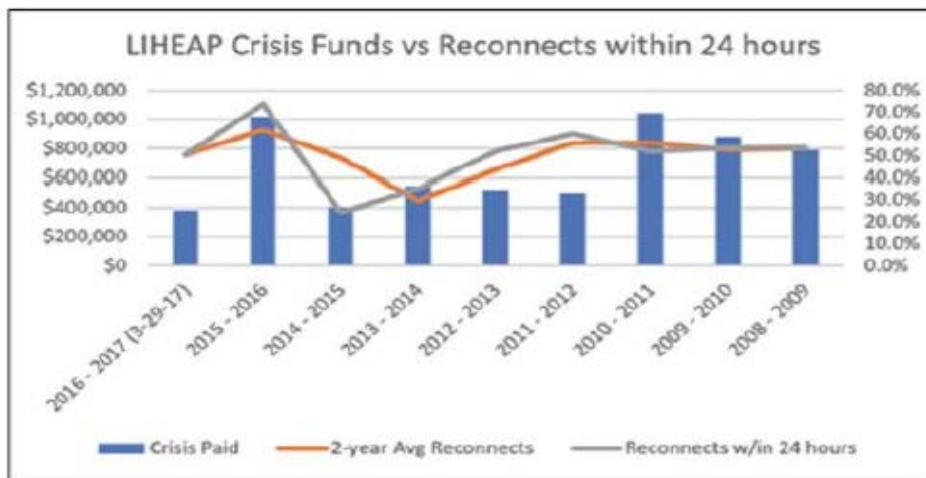
In the Company’s Reply Comments, Attachment A included various customer service materials, past-due bill payment requests, and disconnection notices. These notices actually reinforce and extend ECC’s concerns. First, none of the past-due bill and disconnection notices provide information about filing a complaint with the Commission. Second, in addition to requiring full past-due bill payment and a reconnection fee in order to reestablish service, the Company also requires a deposit of two month’s average electric usage. Third, the Company provides an example of a bill with a scheduled payment plan under CWR. This particular customer is required to pay \$200 per month, an amount that would be onerous for a low-income

⁵*Id.*

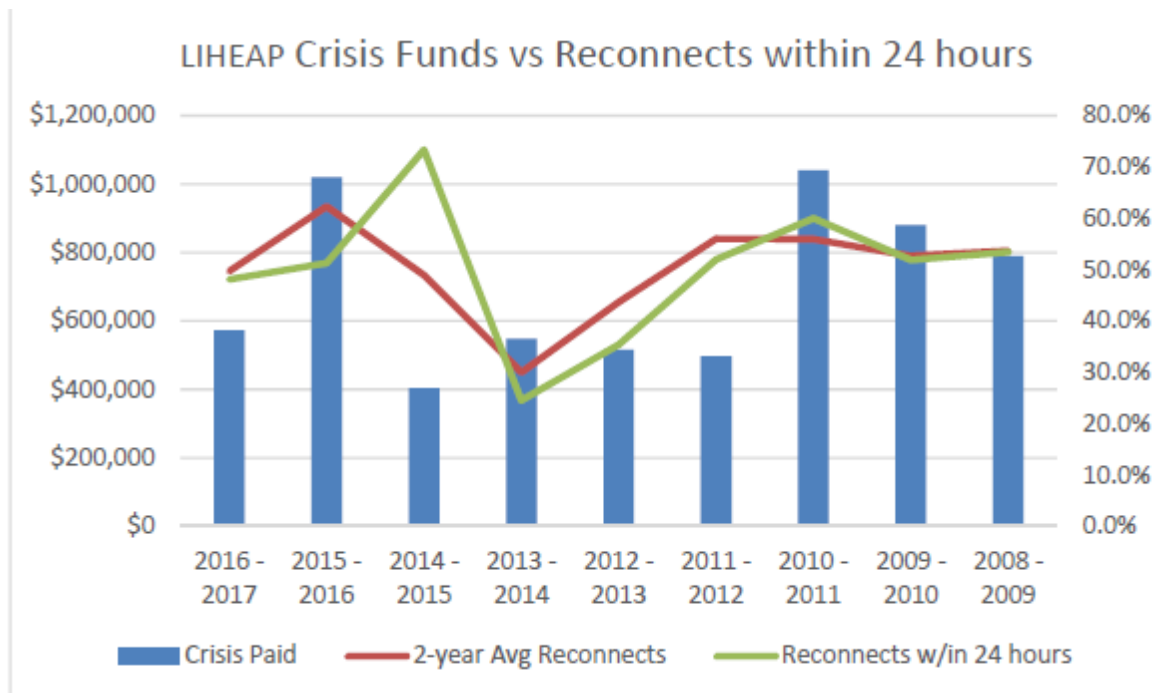
household. ECC respectfully requests that the Commission require the Company to show that their CWR payment arrangements do not exceed ten percent of a customer’s household income.

LIHEAP Crisis funds and service reconnections

In the attached Schedule 2, the Company states, “Minnesota Power is not able to distinguish ‘LIHEAP crisis funds’ from other LIHEAP dollars in its Customer Information System (“CIS”), therefore the Company could not provide the ‘Customers restored within 24 hours and received LIHEAP Crisis Funds’ as requested.” Yet, the Company provided the following two graphs showing the number of customers restored within 24 hours and the level of LIHEAP crisis dollars for several years.⁶



⁶ ECC Initial Comments, Schedule 6.



As previously discussed, the difference between these two graphs track the difference between the original and “corrected” percentages of customers reconnected within 24 hours. In Schedule 3, the Company also provided information about LIHEAP Crisis funds, obtained from the Department’s e-heat system. In the initial graph and reported 24-hour reconnections, the level of LIHEAP crisis funds tracked fairly consistently with the level of LIHEAP crisis funds. In the “corrected” graph, the one year in which there is a significant variation between 24-hour reconnections and LIHEAP crisis funds is 2015, the year in which the Company first reported 29.6% 24-hour service restorations and then corrected that number of 73.37% and the year in which only \$404,238 LIHEAP Crisis funds were received. ECC questions this number, not just because it varies so significantly from the originally reported number, but also because the percentage of 24-hour reconnects in 2016 (“corrected” figure of 51.29%) is *lower* in a year when LIHEAP Crisis funds in that year was more than double the amount in 2015 (\$1,020,663).

It has already been established that the Company requires payment of the full past-due balance in order to reconnect service and that “[Minnesota] Power offers the customer a pay plan, *often in conjunction with agency funds*, and considers this as ‘payment in full’...The Company reconnects once funds are promised or obtained (emphasis added).”⁷ The Company, at 10, however, states that “the Company does not agree that there is a direct correlation between crisis funding received and reconnections within 24 hours. In fact, the Company’s statistics show that in 2017 ... roughly 10% of 24 hour reconnects were made with help from energy assistance programs.” To the best of ECC’s knowledge, the Company has not provided any information about these ‘statistics.’

ECC respectfully requests that the Commission require Minnesota Power to provide information about the number of customers restored to service with LIHEAP crisis funds, to offer payment arrangements to disconnected customers that do not rely primarily on the availability of LIHEAP agency funds and to report the number of reconnections of service in a consistent manner. ECC also reiterates the recommendation that the Commission investigate the differences in the original and reported numbers depicted in the two graphs that the Company provided.

Payment arrangements

The Company maintains that “the disconnection for non-payment process would not be triggered if a payment agreement was entered and kept” MP at 4. However, it is not clear that the Company is offering payment agreements that are affordable and sustainable. The Company states:

⁷ ECC Initial Comments, Schedule 3.

Payment plans may be set to a schedule of weekly, bi-weekly or monthly and have varying term lengths. This variation in schedule and term makes responding ...with an average monthly payment difficult without distorting the values. Therefore, the following are the average of the total payment plan due, not the scheduled payments...Average monthly payment required - \$160.75.⁸

It is not clear to ECC whether the average monthly payment amount would be higher or lower than “scheduled payments” but, the required average monthly payment amount may not be sustainable for low income customers, particularly if it does not include the current month’s electric bill. Further, the Company claims, at 6, that their “offering of payment agreements ... [is] proactive and timely.” ECC questions this claim since the average past due balance for disconnected customers was \$471 and customers receiving disconnection notices (17,454) were past due an average of 89 days.⁹

ECC reiterates the request that the Commission require the Company to provide the total amount of payment required each month and, further, to explain how weekly or bi-weekly payment terms consider the financial circumstances of their customers.

In addition, ECC respectfully requests that the Commission require Minnesota Power to prominently include information, in customer service materials and on past due bills, about filing a complaint or appealing the amount of monthly payment that the Company is requiring. As shown in the Company’s Reply Comments, Attachment A, the only reference to the Public Utilities Commission is in the “New Customer Guide.” In Attachment D, the Company is providing financial resource and CWR information. That brochure includes the following statement “If you and Minnesota Power cannot agree on a payment plan, you have 10 days to appeal to the Public Utilities Commission.” No Commission contact information is included on this brochure. ECC further requests that the Commission review all of the Company’s customer

⁸Id.

⁹ ECC Initial Comments, Schedules 4 and 8.

service material to ensure that Minnesota Power’s customers are aware of their right to file a complaint and that the appropriate contact information is clearly displayed.

Service disconnections

Schedule 1 includes information from Minnesota Power’s CWR reports for 2017 and 2018. ECC’s concern about MP’s service reconnection policies is reflected in that schedule, particularly in the number of customers who remain disconnected longer than 61 days. The contrast between MP’s practice and Xcel Energy’s is shown in the following table:

<u>Customers remaining disconnected 61+ days</u>		
2017	Minnesota Power	Xcel Energy
Jan	203	27
Feb	208	17
Mar	207	18
Nov	427	155
Dec	431	92
2018	Minnesota Power	Xcel Energy
Jan	344	43
Feb	346	23
Mar	293	33

With nearly ten times the number of residential customers, Xcel Energy has significantly fewer customers that remain disconnected longer than 61 consecutive days. ECC respectfully requests that the Commission require MP to enter payment agreements in order to restore electric service to disconnected customers, particularly those whose heat is affected by that service disconnection.

Reconnect Pilot

For the reasons outlined above, in the most recent MP rate case and in the Initial Comments in this matter, ECC continues to recommend that the Commission reject the Company's proposed Reconnect Pilot. In addition, the Company, at 15, states that "customers initially selected to receive the meters with the remote reconnect capability were selected based on disconnection/reconnection frequency, not income." Of course, low-income customers are least likely to afford to pay for electric service and most likely to experience utility service disconnections. Also, MP LIHEAP customers represent 34% of all disconnected customers even though they represent only 8% of the general residential customer class.

In addition, at 16, the Company states that "95% of [the 237 reconnection] orders were completed during regular working hours." Further, it is unclear to ECC how, if a personal representative is present when a remote disconnect signal is sent, the pilot addresses the Company's concerns about "difficult access, hazardous location, and threats such as a dog or other potential unsafe condition" (SRSQ, p. 36). The pilot, in other words, will not result in cost-savings or safety benefits. Most importantly, the pilot does not change the Company's requirement that disconnected customers pay the entire past due balance, a reconnection fee and a substantial service deposit in order to restore their electric service.

III. CONCLUSION

ECC does not believe that the Company has adequately addressed the concerns outlined above and in ECC's Initial Comments. Therefore, ECC renews the initial recommendations and respectfully requests that the Commission:

- 1) Require Minnesota Power to suspend all service disconnections pending an investigation including, but not limited to:

- a) The Company's compliance with all Minnesota Statutes and Rules regarding utility service disconnection during and outside of the CWR period, service reconnection and payment agreements, including identification of responsible employees;
 - b) The Company's compliance with Minnesota Statutes and Rules regarding utility service disconnection reporting, including identification of responsible employees;
 - c) An external audit to review the number of the Company's customers disconnected from service, restoration of service within 24 hours and restoration of service under payment agreements and interviews with affected customers, including those identified as the target population for the Reconnect Pilot;
 - d) Information regarding payment agreements, including the amount and frequency of requested payments on customers' past-due balances;
 - e) The Company's reliance on LIHEAP and LIHEAP crisis funds as a means for restoring customer service;
- 2) Reject the Company's proposed Remote Reconnection Pilot
 - 3) Require the Company to report participation in the low-income Energy Partners Program by counting participants rather than measures.

In addition, ECC also respectfully requests that the Commission:

- 4) require the Company to show that their CWR payment arrangements do not exceed ten percent of a customer's household income;
- 5) require the Company to offer payment arrangements to disconnected customers;
- 6) require Minnesota Power to explain why they say they require payment in full in order to restore customers during the non-CWR months and, at the same time, why they show the number of customers they claim to restore under a payment plan;
- 7) require the Company to provide information about the number of customers restored to service with LIHEAP crisis funds;
- 8) require the Company to prominently include information, in customer service materials and on past due bills, about filing a complaint or appealing the amount of monthly payment that the Company is requiring;
- 9) review all of the Company's customer service material to ensure that Minnesota Power's customers are aware of their right to file a complaint and that the appropriate contact information is clearly displayed.

Respectfully submitted,

September 10, 2018



Pam Marshall

Schedule 1

2017	# of CWR requests	# of reconnection requests granted	Customers remaining disconnected 61+ days	Customers remaining disconnected	Customers disconnected 24+ hours heat-affected	Customers disconnected for non-payment
Jan	564	50	243	203	45	75
Feb	425	55	246	208	36	61
Mar	406	95	259	207	67	138
Apr (16-30)	203	13	407	302	115	224
Oct (15-31)	blank	32	458	394	35	84
Nov	852	78	472	427	39	99
Dec	542	41	464	431	23	59
2018						
Jan	890	64	385	344	54	118
Feb	644	63	401	346	95	118
Mar	504	27	374	293	92	168

RESPONSE:

Month	LIHEAP Reconnects w/in 24 hrs ¹	Total Reconnects w/in 24 hrs
2017-01	22	47
2017-02	28	49
2017-03	36	92
2017-04	35	107
2017-05	27	119
2017-06	78	272
2017-07	44	143
2017-08	54	177
2017-09	43	123
2017-10	15	64
2017-11	19	58
2017-12	11	33
	412	1,284

A clarification to note is that in the table provided by ECC in IR #2, the total number of reconnects cited as 2,668 is incorrect in the "Total Customers Restored w/in 24 hrs" column. The 2,688 number provided reflects **total** disconnects in 2017, not **reconnects within 24hrs**. Please refer to the original filing, Appendix A, page 27 for the correct total of customers restored within 24 hours, which is 1,284.

¹ "Minnesota Power is not able to distinguish "LIHEAP crisis funds" from other LIHEAP dollars in its Customer Information System ("CIS")", therefore the Company could not provide the "Customers restored w/in 24 hours and received LIHEAP Crisis Funds" as requested.

Response by: Jenna Warmuth
Title: Senior Public Policy Advisor
Department: Regulatory Affairs 218-355-
Telephone: 3448

Energy CENTS Coalition
Utility Information Request

Docket Number:	E015/M-18-250	Date of Request:	May 9, 2018
Requested From:	Minnesota Power	Response Due:	May 21, 2018
Requesting By:	Pam Marshall Energy CENTS Coalition 823 E 7 th Street, St. Paul, MN 55106 651-774-9010 pam@energycents.org		

REQUEST NO.																
6	Please provide the total amount of LIHEAP and LIHEAP Crisis funds received on behalf of MN Power customers: <table border="0" style="width: 100%; margin-top: 10px;"> <tr> <td style="width: 30%;"></td> <td style="width: 35%; text-align: center;">LIHEAP Funds</td> <td style="width: 35%; text-align: center;">LIHEAP Crisis Funds</td> </tr> <tr> <td>2014</td> <td></td> <td></td> </tr> <tr> <td>2105</td> <td></td> <td></td> </tr> <tr> <td>2016</td> <td></td> <td></td> </tr> <tr> <td>2017</td> <td></td> <td></td> </tr> </table>		LIHEAP Funds	LIHEAP Crisis Funds	2014			2105			2016			2017		
	LIHEAP Funds	LIHEAP Crisis Funds														
2014																
2105																
2016																
2017																

RESPONSE:

Minnesota Power is not able to distinguish “LIHEAP crisis funds” from other LIHEAP dollars in its Customer Information System (“CIS”). The information provided below is taken directly from the eHeat website and is not cross-referenced with the Company’s CIS data for the reason stated above.

Year	LIHEAP Funds	LIHEAP Crisis Funds	Total
2014	1,597,377.50	548,366.78	2,145,744.28
2015	1,420,138.56	404,237.98	1,824,376.54
2016	1,423,897.48	1,020,663.42	2,444,560.90
2017	1,728,835.89	573,207.91	2,302,043.80

Response by: Jenna Warmuth
 Title: Senior Public Policy Advisor
 Department: Regulatory Affairs
 Telephone: 218-355-3448

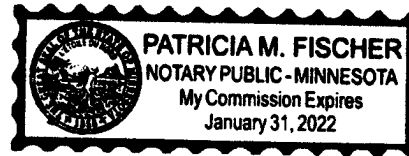
AFFIDAVIT OF SERVICE

Pam Marshall, being duly sworn, says that on the 10th day of September 2018, she served the individuals on the attached service list, by electronic filing, the Energy CENTS Coalition's Reply Comments In the Matter of Minnesota Power's 2018 Safety, Reliability and Service Quality Standards Report, MPUC Docket No. E-015/M-18-250.

Pam Marshall

Pam Marshall

Patricia M. Fischer



Patty Fischer

Subscribed and sworn to before me
this 10th day of September, 2018

Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Carl	Cronin	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-250_M-18-250
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_18-250_M-18-250
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-250_M-18-250
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_18-250_M-18-250
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-250_M-18-250
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-250_M-18-250
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duluth, MN 55802	Electronic Service	No	OFF_SL_18-250_M-18-250
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-250_M-18-250
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-250_M-18-250