



August 12, 2020

VIA E-FILING

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

Re: Comments in the Matter of Minnesota Power, Otter Tail Power, and Xcel Energy's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019
Docket No. E015/M-20-404

Dear Mr. Seuffert:

Minnesota Power (the "Company") respectfully submits to the Minnesota Public Utilities Commission ("Commission") the following comments in the matter of the Company's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2019 ("SRSQ").

Background

On April 1, 2020, Minnesota Power filed their annual SRSQ report as set by Minn. Rules, Chapter 7826 and in Commission orders. A Notice of Comment Period was issued on April 20, 2020. The Commission opened specific topics for comment.

Response to Topics

1. Should the MPUC accept the 2019 SRSQ reports?

Minnesota Power has provided all requested information for the 2019 SRSQ filing and the report can be accepted unless the MPUC requires additional information.

2. Should the MPUC approve MP's proposed transition from a rolling 5 year average to set reliability standards to bench marking to the IEEE Reliability Working Group?
Please discuss:

- a. Time lag of IEEE bench marking data

The time lag will have one year of missing data, for example, for 2020 goals Minnesota Power would have to use 2014-2018 IEEE reliability data since the 2019 data is not published until after April 1st of the following year (2020).

- b. Xcel's proposal to use a 5 year average of IEEE 2nd quartile results vs OTP and MP's proposal to use the prior year's bench marking results, keeping standards consistent between utilities

Minnesota Power agrees with Xcel Energy to use a five year average of IEEE second quartile results for reliability targets. The Company would prefer to be benchmarked to similar sized utilities which would place us as a medium sized company in the eyes of IEEE (100,000-1,000,000 customers).

- c. The move from reporting reliability results for each work center to the state as a whole, and whether utilities need a variance to Minn Rules 7826.0500 Subp 1 A-C, and Subp 2

Minnesota Power already reports reliability numbers as one work center which covers the entire service territory. Minnesota Power would not need a variance for Minn. Rules 7826.0500 Subp 1 A-C, and Subp 2; Minnesota Power only has one work center.

- d. The choice of using the IEEE working group vs EIA data for bench marking

Minnesota Power believes the IEEE working group has similar information to other utilities since all respondents use the IEEE 1366 – Guide for Electric Power Distribution Reliability Indices for guidance on reporting. The respondents on EIA may or may not follow IEEE 1366 for collecting and reporting on reliability data.

3. Feedback on utilities' proposed public facing summary of annual reports. Discuss:

- a. Whether the information is digestible for members of the general public

Minnesota Power is open to additional avenues for making the information public and will provide more input in reply comments.

- b. If there is any additional content utilities should include in the documents

Minnesota Power believes the content is sufficient at this time.

- c. Potential methods of distributing this information to customers

Minnesota Power is open to additional forms of customer communications. The Company currently focuses on immediate concerns of outage notifications and updates.

4. Should the commission grant Xcel's requested variance to Minn Rules 7826.0500 subpart 1.G? Should the commission vary this rule for all utilities?

Minnesota Power has developed a tracking mechanism within its Outage Management System to help collect and process Major Service Interruptions notifications.

5. Are there other issues or concerns to address?

Minnesota Power has no other issues to discuss in these comments.

Conclusion

Minnesota Power appreciates the opportunity to respond to the topics raised by the Commission.

If you have any questions regarding this filing, please contact me at 218-723-3963 or dmoeller@allete.com.

Yours truly,

A handwritten signature in black ink that reads "David R. Moeller". The signature is written in a cursive, flowing style.

David R. Moeller
*Senior Attorney and Director of
Regulatory Compliance*

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