



AN ALLETE COMPANY

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July 22, 2024

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

Re: **2023 Conservation Improvement Program Consolidated Filing**  
**Docket No. E015/M-24-48**  
**Reply Comments**

Dear Mr. Seuffert:

Minnesota Power (the “Company”) respectfully submits to the Minnesota Public Utilities Commission (“Commission”) the following reply comments regarding Minnesota Power’s 2023 Conservation Improvement Program (“CIP”) Consolidated Filing (“Consolidated Filing”).

### Reply Comments

On April 1, 2024, Minnesota Power filed its 2023 CIP Consolidated Filing. On July 2, 2024, the Minnesota Department of Commerce, Division of Energy Resources (“Department”) filed comments recommending that the Commission approve the Company’s Consolidated Filing. Specifically, the Department recommended the Commission:

1. Approve Minnesota Power’s 2023 CIP tracker account, as summarized in Table 1 above, with a December 31, 2023 tracker balance \$477,245;
2. Approve a 2024/2025 Conservation Program Adjustment of \$0.001444 per kWh, to be effective on the first billing cycle in the next full month after Commission approval;
3. Approve a DSM financial incentive of \$2,190,843 for Minnesota Power’s 2023 CIP achievements, to be included in the Company’s CIP tracker account no sooner than the issue date of the Commission’s *Order* in the present docket; and
4. Require Minnesota Power to submit a compliance filing, within 10 days of the issue date of the *Order* in the present docket, with revised tariff sheets reflecting the Commission’s determinations in this matter.

I AM  
**ZERO INJURY.**

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

Mr. Seuffert  
July 22, 2024  
Page 2

Minnesota Power also asks that the Commission approve a monthly Carrying Charge rate of 0.7292 percent, as requested on page 6 of its Consolidated filing.

Minnesota Power thanks the Department for their analysis of the Consolidated Filing, and looks forward to working with them in future dockets, stakeholder groups, and other processes.

If you have any questions regarding this filing, please contact me at (218) 591-4870 or [avang@mnpower.com](mailto:avang@mnpower.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Vang', with a stylized flourish at the end.

Analeisha Vang  
*Senior Public Policy Advisor*

AMV:th

STATE OF MINNESOTA    )  
                                  )ss  
COUNTY OF ST. LOUIS    )

AFFIDAVIT OF SERVICE VIA  
ELECTRONIC FILING

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Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 22<sup>nd</sup> day of July, 2024, she served Minnesota Power's Reply Comments in **Docket No. E015/M-24-48** on the Minnesota Public Utilities Commission and the Energy Resources Division of the Minnesota Department of Commerce via electronic filing. The persons on E-Docket's Official Service List for this Docket were served as requested.



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Tiana Heger