

June 1, 2022

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

Re: 2021 Conservation Improvement Program Consolidated Filing Docket Nos. E015/M-22-130, E015/CIP-20-476.01

Dear Mr. Seuffert:

Minnesota Power (the "Company") respectfully submits to the Minnesota Public Utilities Commission ("Commission") the following reply comments regarding Minnesota Power's 2020 Conservation Improvement Program ("CIP") Consolidated Filing ("Consolidated Filing").

## **Reply Comments**

On April 1, 2022, Minnesota Power filed its 2021 CIP Consolidated Filing. On May 19, 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 2021 CIP tracker account, as summarized in Table 1 above, with a December 31, 2021 tracker balance \$3,583,333.
- Approve MP's monthly carrying charge rate of 0.2917 percent.
- Approve a 2022/2023 CPA of \$0.002002 per kWh, to be effective July 1, 2022, or on the first billing cycle in the next full month after Commission approval, whichever is later.
- 4. Approve a DSM financial incentive of \$1,937,003 for Minnesota Power's 2021 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.
- 5. Grant Minnesota Power a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 until issuance of the Commission's Order establishing MP's 2021/2022 CPA.
- 6. 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.



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Minnesota Power thanks the Department for their thorough 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) 355-3602 or <a href="mailto:avang@mnpower.com">avang@mnpower.com</a>.

Sincerely,

Analeisha Vang

Senior Public Policy Advisor

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STATE OF MINNESOTA	) ) ss	AFFIDAVIT OF SERVICE VIA ELECTRONIC FILING
COUNTY OF ST. LOUIS	)	

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1<sup>st</sup> day of June, 2022, she served Minnesota Power's Reply Comments in **Docket Nos. E015/M-22-130 and E015/CIP-20-476.01** 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.

Tiana Heger