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Lori Hoyum
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November 4, 2015

VIA E-FILING

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

RE: In the Matter of Minnesota Power's 2015 Annual Report Concerning Safety, Reliability and Service Quality, And Proposed Annual Reliability Standards Docket No. E015/M-15-323

Dear Mr. Wolf:

Minnesota Power hereby submits, via electronic filing, its Supplemental Comments in response to the Department of Commerce, Division of Energy Resources September 23, 2015 Response to Comments in the docket.

Please contact me at the number above if you have any questions regarding this filing.

Yours truly,

A handwritten signature in cursive script that reads "Lori Hoyum".

Lori Hoyum

Attachment
cc: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Minnesota Power’s 2015 Annual Report
Concerning Safety, Reliability, Service Quality,
And Proposed Annual Reliability Standards

Docket No. E015/M-15-323

Supplemental Comments

I. Introduction

The Department of Commerce, Division of Energy Resources (“the Department”) released its Response to Reply Comments in the 2014 Safety, Reliability and Service Quality Report (“Report”) docket on September 23, 2015. The following Supplemental Comments address the Department’s inquiries related to Minnesota Power’s (or, “the Company”) Reply Comments dated August 10, 2015.

II. Response to Comments

The following items encompass Minnesota Power’s responses to the Department’s inquiries from its September 23, 2015 Response to Comments in the docket.

1. A discussion on the process it used to identify the potential cause(s) for the decreasing number of involuntarily disconnected customers able to be restored within 24 hours, and Information to assure the Commission that the decline in involuntary disconnect restoration time is not due to an internal cause

In response to the Department’s inquiry, Minnesota Power analyzed the previous five years of submitted SRSQ Involuntary Disconnections data, and inquired with Customer Information Systems (“CIS”) professionals who handle these transactions. The Company could not pinpoint an internal factor that contributed to the decrease in twenty-four hour restoration time for its customers.

The disconnection of a customer's service is the Company's most costly course of action and therefore, disconnection is the Company's last resort in remedying past due payments. Minnesota Power's internal business practices regarding the reconnection of a customer's service have remained unchanged for several years. Once the Company receives payment, the customer's service is generally reconnected the same business day and reconnection time does not exceed twenty-four hours from when payment is received. Consequently, the Company concludes that the 2014 decline in involuntary disconnect restoration time is likely not due to an internal matter.

2. A discussion of its anticipated plans for the service center buildings in Nisswa, Aurora, and Chisholm, specifically, whether MP plans to sell these buildings, and how the Company will ensure that any gain on the sale is returned to ratepayers.

Minnesota Power intends to sell the three identified Minnesota Power service centers as soon as possible. Any sale of the facilities will be contingent upon securing Minnesota Public Utilities Commission approval. The current estimated market value for each of the three service centers is below the current book value of each asset. Therefore, no gain on sale of any one of the facilities is expected at this juncture.

III. Conclusion

Minnesota Power appreciates the opportunity to address the Department's remaining concerns. The Company is aware of the economic challenges of some of its customers and strives to support them with appropriate and reasonable business practices.

Respectfully submitted,

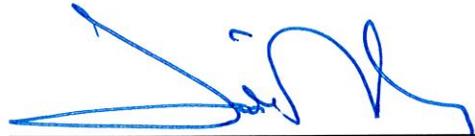


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STATE OF MINNESOTA)
) ss
COUNTY OF ST. LOUIS)

AFFIDAVIT OF SERVICE VIA
E-FILING AND
FIRST CLASS MAIL

Jodi Nash, of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 4th day of **November, 2015**, she e-filed Minnesota Power's Supplemental Comments in Docket No. E015/M-15-323 to the Minnesota Public Utilities Commission ("MPUC") and Minnesota Department of Commerce ("DoC") via electronic filing. The remaining parties on the attached service list were served as indicated.



Jodi Nash

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-323_M-15-323
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_15-323_M-15-323
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_15-323_M-15-323
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_15-323_M-15-323
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-323_M-15-323
John	Lindell	agorud.ecf@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_15-323_M-15-323
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_15-323_M-15-323
Ron	Spangler, Jr.	rlspangler@otpc.com	Otter Tail Power Company	215 So. Cascade St. PO Box 496 Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_15-323_M-15-323
SaGonna	Thompson	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_15-323_M-15-323
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_15-323_M-15-323