



March 1, 2021

VIA E-FILING

Will Seuffert
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 Petition for
Approval of a Rider for Customer Affordability
of Residential Electricity (CARE)
Docket No. E015/M-11-409**

Dear Mr. Seuffert:

Minnesota Power (or the "Company") submits to the Minnesota Public Utilities Commission ("Commission") its Ninth Annual Report in compliance with Commission Orders in Docket Nos. E015/M-11-409 and E015/GR-09-1151 and pursuant to Minn. Stat. §216B.16, subd. 15, including Order Point 6 of the Commission's December 19, 2018 Order that requires Minnesota Power to "submit future annual reports on its CARE program on March 1, each year." The Company looks forward to working with the Commission to review the information contained in this Annual Report.

Please contact me at (218) 355-3805 or tkoecher@mnpower.com if you have any questions regarding this filing.

Yours truly,



Tina S. Koecher
Manager - Customer Experience Operations

TSK:th
Attach.

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

In the Matter of Minnesota Power's
Petition for Approval of a Rider for Customer
Affordability of Residential Electricity

Docket No. E015/M-11-409

Ninth Annual Report

SUMMARY

Minnesota Power respectfully submits its Ninth Annual Report for the Rider for Customer Affordability of Residential Electricity (or CARE) discount program to the Minnesota Public Utilities Commission ("Commission") in compliance with Commission Orders in Docket Nos. E015/M-11-409 and E015/GR-09-1151 and pursuant to Minn. Stat. § 216B.16, subd. 15.

Minnesota Power is seeking Commission approval of this Ninth Annual Report, which includes the program modifications that were developed through a collaborative stakeholder engagement process and approved by the Commission in its Order dated October 30, 2019, with a program implementation date of January 1, 2020.

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

In the Matter of Minnesota Power's
Petition for Approval of a Rider for Customer
Affordability of Residential Electricity

Docket No. E015/M-11-409

Ninth Annual Report

I. INTRODUCTION

Minnesota Power (or the “Company”) submits this Ninth Annual Report for its 2019-2020 Customer Affordability of Residential Electricity discount program (“CARE”, “CARE program” or “program”) to the Minnesota Public Utilities Commission (“Commission”) in compliance with Commission Orders in Docket Nos. E015/M-11-409 and E015/GR-09-1151 and pursuant to Minn. Stat. §216B.16, subd. 15. Minnesota Power is seeking Commission approval of this Ninth Annual Report which includes the program modifications that were developed through a collaborative stakeholder engagement process and approved by the Commission in its Order dated October 30, 2019, with a program implementation date of January 1, 2020.

Of note and consequence is that, while the CARE modifications implemented January 1, 2020, were not developed in a COVID-19 peacetime emergency context, the timing of these significant program changes has helped to reduce balances and potential arrears for customers in a time of great uncertainty. Further, while residential arrears balances have grown during the peacetime emergency, the number of customers with arrears decreased significantly midyear in 2020 and remained lower at the close of 2020 as compared to the counts observed at the end of 2019. There are many steps Minnesota Power has taken that contributed to these results, including the rate case resolution,¹ interim rate refunds, flexible payment plans, CARE discounts and referrals to apply for energy assistance dollars. While the results for program year 2020 are reported similarly to prior Annual CARE Reports, the year in which these changes were effectuated was by no means typical and does not serve as a representative baseline year.

¹ In the Matter of the Emergency Petition of Minnesota Power for Approval to Move Asset-Based Wholesale Sales Credits to the Fuel Adjustment Clause and Resolve Rate Case in Docket Nos. E015/M-20-429 and GR-19-442.

A. Background and Procedural History

Minn. Stat. § 216B.16, subd. 15, the low income affordability program statute, requires all gas utilities to file proposals for low income affordability programs. Minnesota Power is the only electric utility that offers an affordability program under this statute, pursuant to the Commission's November 2, 2010 Order in its general rate case under Docket No. E015/GR-09-1151.²

Minnesota Power has offered its CARE program to its residential customers since November 1, 2011. Those who qualify under the federally-funded Low Income Home Energy Assistance Program ("LIHEAP"), as determined by application and approval through Energy Assistance Program Service Providers, are eligible for CARE. The CARE program provides a discount to the Company's standard residential tiered rates and includes an arrearage forgiveness component. A participant may be removed from the program if two consecutive payments are missed or they fail to establish continued LIHEAP eligibility within the grace period of each year. In an effort to better serve low income customers, the CARE program has evolved since it was initially offered in 2011. Updates include automatic re-enrollment for continued eligibility for LIHEAP and removing the cap of 5,000 participants in the CARE program,³ the addition of an arrearage forgiveness component,⁴ and the removal of the requirement for budget billing.⁵ Figure 1 on page 4 summarizes program changes and improvements.

The Company has continually worked in collaboration with the Commission's Consumer Affairs Office ("CAO"), Energy CENTS Coalition, and nonprofit organizations within Minnesota Power's service territory to identify improvements to the CARE program, improve coordination with LIHEAP, and determine how best to enhance public outreach.⁶ Outreach efforts were discussed extensively in the Sixth Annual Report and accepted as adequately addressing the Commission's concerns regarding program outreach, as

² Xcel Energy provides its low income electric customers a discounted rate under its low income electric rate discount statute (Minn. Stat. § 216B.16, subd. 14). Xcel offers this discount as part of its PowerON program.

³ Order Accepting the Second Annual Report (July 3, 2014).

⁴ Order Accepting the Third Annual Report (July 10, 2015).

⁵ Order Accepting the Fifth Annual Report (January 5, 2018).

⁶ Order Accepting the Fifth Annual Report (January 5, 2018).

directed in the Commission's January 5, 2018 Order.⁷ Recommendations identified as program enhancements through a collaborative stakeholder engagement process were included as part of the Seventh Annual Report and were approved by the Commission in its October 30, 2019 Order for a program implementation date of January 1, 2020. At a high level, program enhancements include an affordability discount based on a target energy burden of three percent; an automatic flat \$15 discount for LIHEAP-approved customers who are senior, disabled, and legacy CARE participants; limited enrollment based on program funding; and a change in the grace period from May 31 to May 1.⁸

In its December 19, 2018 Order, the Commission established an Annual Report filing date of March 1. Minnesota Power's last Annual Report was submitted in March, 2020 and approved.⁹

B. Organization of Filing

Minnesota Power's Ninth Annual CARE Program Report covers the period of October 1, 2019 through September 30, 2020 ("program year 2020") and includes the traditional CARE-required reports it has provided in the past. Additionally, it contains the new reporting requirements including the program modifications that were developed through a collaborative stakeholder engagement process and approved by the Commission in its Order dated October 30, 2019, with a program implementation date of January 1, 2020.

⁷ Order Accepting the Sixth Annual Report (December 19, 2018).

⁸ Order Accepting the Seventh Annual Report (October 30, 2019).

⁹ Order Accepting the Eighth Annual Report (September 2, 2020).

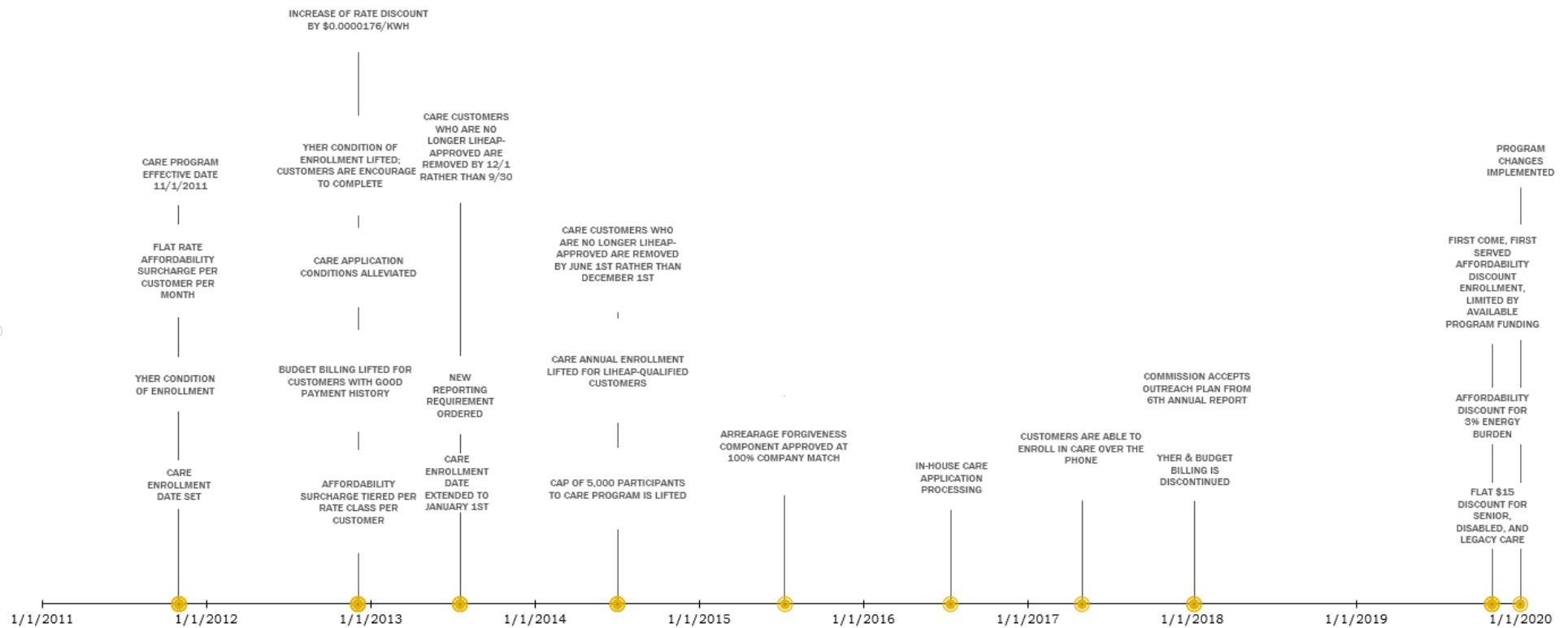


Figure 1 - Improvements Made to the CARE Program

II. PROCEDURAL MATTERS

Pursuant to Minn. Stat. § 216B.16, subd. 1 and Minn. Rule 3825.1300, Minnesota Power submits the following information:

A. Name, Address, and Telephone Number of Utility (Minn. Rules 7825.3500 (A))

Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 722-2641

B. Name, Address, and Telephone Number of Utility Attorney (Minn. Rules 7825.3500 (A))

David R. Moeller
Senior Attorney & Director of Regulatory Compliance
Minnesota Power
30 West Superior Street
Duluth, MN 55802
(218) 723-3963
dmoeller@allete.com

C. Date of Filing and Modified Rates Effective Date (Minn. Rule 7829.1300, subp. 3 (C))

This report is being filed on March 1, 2021. Minnesota Power is not proposing to implement changes to the CARE program, nor is the Company requesting to modify rates in this filing.

D. Statute Controlling Schedule for Processing the Petition (Minn. Rule 7829.1300, subp. 3(D))

Minnesota Power's Ninth Annual Report falls within the definition of a "Miscellaneous Tariff Filing" under Minn. Rules 7829.0100, subp. 11 and 7829.1400, subp. 1 and 4, permitting comments in response to a miscellaneous filing to be filed within 30 days, and reply comments to be filed no later than 10 days thereafter.

E. Utility Employee Responsible for Filing

Tina S. Koecher
Manager – Customer Experience Operations
30 West Superior Street
Duluth, MN 55802
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F. Impact on Rates and Services (Minn. Rule 7829.1300, subp. 3(F))

The existing Affordability Surcharge will have no effect on Minnesota Power's overall revenue requirements. The Affordability Surcharge applied to other firm electric customers will be offset by the discount offered to CARE program participants, and monitored through a tracker. The additional information required under Minn. Rule 7829.1300, subp. 3(F) is included throughout this Annual Report.

G. Official Service List

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H. Service on Other Parties

Minnesota Power is eFiling this report and notifying all persons on Minnesota Power's CARE Program Service List that this report has been filed through eDockets. A copy of the service list is included with the filing along with a certificate of service.

I. Filing Summary

As required by Minn. Rule 7829.1300, subp. 1, Minnesota Power is including a summary of this filing on a separate page.

III. ANNUAL REPORT

A. CARE Reporting Requirements

This section of the Annual Report provides information required by the Commission's Orders under Docket No. E015/M-11-409.

1. Program Tracker, Administration and Funding

a. CARE Tracker

The CARE tracker is provided in detail as Attachment A.

b. CARE Program Administration

In its December 19, 2018 Order, the Commission authorized Minnesota Power to maintain administration of the CARE program and reaffirmed that authorization in its October 30, 2019 Order.¹⁰

Energy Assistance Program ("EAP") Service Providers in Minnesota Power's service territory, including AEOA, continue to qualify and approve customers for LIHEAP as they have done in the past.

c. CARE Program Funding

The current Affordability Surcharge rate is based on anticipated participation levels under the current CARE program design. The Affordability Surcharge is not applicable to LIHEAP-approved¹¹ customers or the Company's Lighting Class. Program modifications and a change to the Affordability Surcharge were most recently approved with an effective date of January 1, 2020. The amount collected through the Affordability Surcharge and

¹⁰ Since the inception of the CARE program, Arrowhead Economic Opportunity Agency ("AEOA") administered the CARE program for Minnesota Power. However, starting May 1, 2017, the Company took over the administration of the CARE program. The decision for Minnesota Power to administer the CARE program was in response to a letter of resignation from AEOA as the program administrator and was intended to be transitional while the Company conducted a process review.

¹¹ Minnesota Power has used the term "LIHEAP-qualified". This definition means that customers qualified through the LIHEAP application process (i.e. applied and were approved), but could fall in any of three buckets – approved and receiving a grant toward electric service, approved and applying a grant toward another fuel or service, approved but no grant because funding ran out. For clarity, it may be better to state "approved for LIHEAP" or "LIHEAP-approved" in this context.

the amount provided in discounts are very closely aligned, as illustrated in the CARE tracker. As such, Minnesota Power is not requesting a change to the Affordability Surcharge in this filing. Included as Attachment B is Minnesota Power's current tariff sheet for the CARE Rider.

d. CARE Program Administrative Costs

The Company requested recovery of program administrative costs as part of its last Annual Report. This was approved as part of the Commission's October 30, 2019 Order, effective January 1, 2020. As shown in the CARE tracker, administrative costs for program year 2020 totaled \$41,968, or 2.4 percent of the program budget. This is well within the limitation of five percent of the program budget that was proposed and approved by the Commission.

2. Program Retention, Satisfaction and Enrollment

a. Program Retention

The total number of participants enrolled at any point in the CARE program year 2020 was 6,925. At the end of program year 2020, the Program had 5,192 active participants. Table 1 on page 9 shows the breakdown in number of customers and retention rates during program year 2020. Not only did the retention rate increase in program year 2020, but also the number of customers enrolled in CARE increased. A total of 1,733 customers were removed from the program during program year 2020 for the same prevalent reasons as in the previous years: customers missed two consecutive payments, left the Company's service territory, or were no longer LIHEAP-approved. Another common reason for removal from CARE in previous years was requests to be moved to Cold Weather Rule ("CWR") protection; however, with the program modifications in 2020, the program is more compatible with CWR protection and generally does not require one option over the other. The exception is those with arrears forgiveness. The billing system cannot accommodate both a CWR payment plan and an arrears forgiveness arrangement. The monthly average number of customers with arrears forgiveness was 118, which is approximately 2 percent of the average number of CARE customers in program year 2020.

Table 1 - CARE Program Customer Retention

CARE Program Retention - Period October 1, 2019 to September 30, 2020		
Designation	Number of Customers	Percentage of Customers
In PY 2020 Participant stayed 0-30 days	84	1%
In PY 2020 Participant stayed 31-60 days	109	2%
In PY 2020 Participant stayed 61-90 days	471	7%
In PY 2020 Participant stayed 91-150 days	445	6%
In PY 2020 Participant stayed over 150 days	5,816	84%
Total Participants	6,925	100%

b. Program Satisfaction

Approximately 8,500 calls or contacts¹² were received in program year 2020. This is up by more than three times the 2019 figures where over 2,400 calls or contacts were received. This increase is indicative of the significant outreach and work with customers regarding the program modifications. In addition, the Company continued to leverage general calls received from residential customers to offer enrollment in the CARE program if the customers were indicated as LIHEAP-approved in the billing system. The Company also regularly reviews affordability program participation to ensure customers are enrolled in the program that best meets their specific needs. This includes reviewing customer participation in the flat and affordability discounts to present the best discount option as well as cross-program referrals to the Company's Conservation Improvement Program ("CIP"). If a customer is participating in the flat discount via the automatic enrollment process but is identified as a high user that may benefit from the affordability discount, the Company proactively contacts the customer to determine which discount is more beneficial. Similarly, affordability discount applications are also reviewed to determine if the customer would receive a larger bill reduction on the flat discount. Minnesota Power also promotes the CARE program to income-qualified customers participating in CIP. Third-party energy auditors delivering conservation programs to income-qualified customers are familiar with the CARE program and have enrollment applications on hand.

¹² Contacts are notes made in customer account records in the billing system related to a conversation with or actions on customer accounts.

c. Enrollment for Program Year 2020

The enrollment trend for program year 2020 is provided in Figure 2 on page 11. There was a sharp increase in enrollment numbers in January, largely due to the automatic enrollment program modification for a flat \$15 discount for senior and disabled LIHEAP customers. Further, as part of the program modification transition, existing CARE participants were automatically transitioned to the CARE legacy flat \$15 discount.

An enrollment drop generally occurs each year when the grace period for LIHEAP approval ends. Customers are removed from the program if they have not applied with the EAP Service Providers and been determined LIHEAP-approved. May 1 marks the end of the grace period¹³ and would typically be the date when Minnesota Power runs its reconciliation program to remove customers who have not yet renewed their LIHEAP approval; however, due to a COVID-19 extension to the LIHEAP deadline to July 1, 2020, Minnesota Power chose to recognize a correspondingly extended grace period to July 1, 2020. There was a less extreme drop in enrollment in July and, while enrollment rates increased after the grace period removal date, enrollment numbers did not get back to the levels observed earlier in the program year. Importantly, CARE enrollments remained higher than prior program years.

¹³ The grace period date changed from May 31 to May 1 as part of the program modifications approved in the Order Accepting the Seventh Annual Report (October 30, 2019).

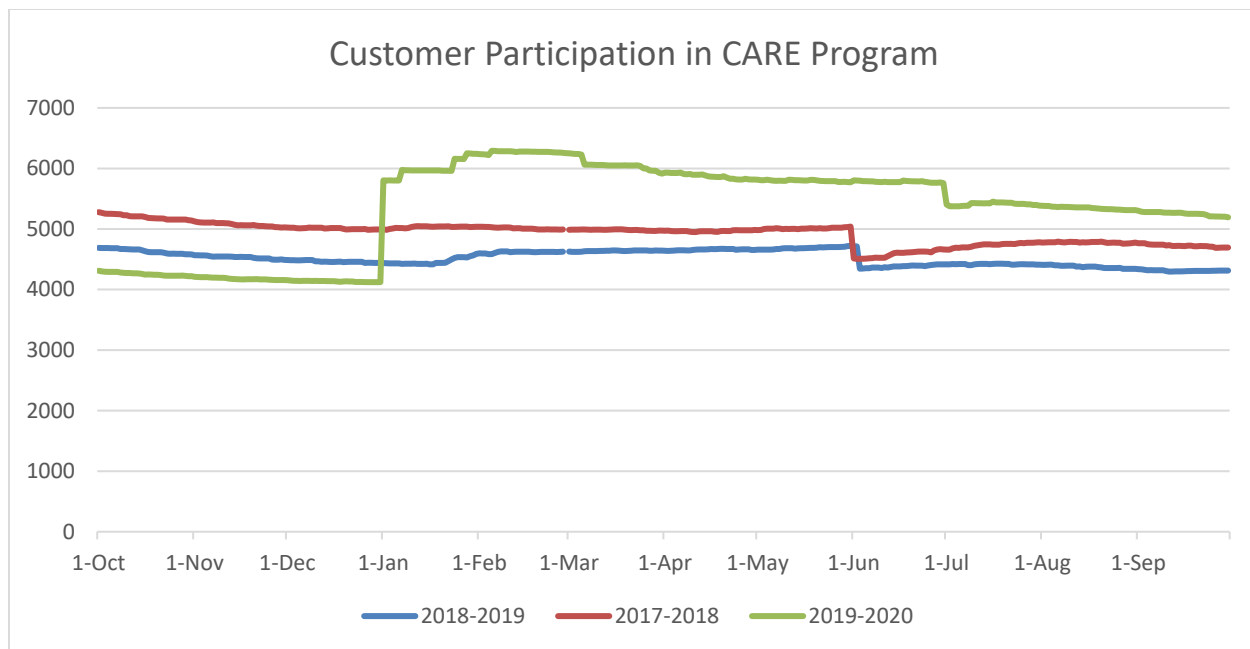


Figure 2 - CARE Program Participation

3. CARE Program Customers with High Energy Usage

a. Percent of Customers with 1,000 kWh Usage or more

Figure 3 on page 12 shows the percentage of CARE program customers for program year 2020 with high energy usage compared to all high-usage LIHEAP customers and high-usage customers on the standard Residential¹⁴ rate. High-usage customers in the context of this report are defined as those who used 1,000 kWh or more in a given month. Each month is looked at individually. Any macro type of impact like the weather (normal, cold waves, or heat waves) tends to affect the three groups similarly, as indicated by the similar usage shapes by month in the figure. The Company counts bill totals and usage amounts only for a customer who was a CARE participant in that specific month.

¹⁴ In the context of this report, “standard Residential customers” means residential customers served under standard rates, excluding customers served under interruptible rates and excluding customers served under the CARE Program and LIHEAP participants. The category “all firm Residential customers” includes CARE Program and LIHEAP participant customers but excludes interruptible rate customers.

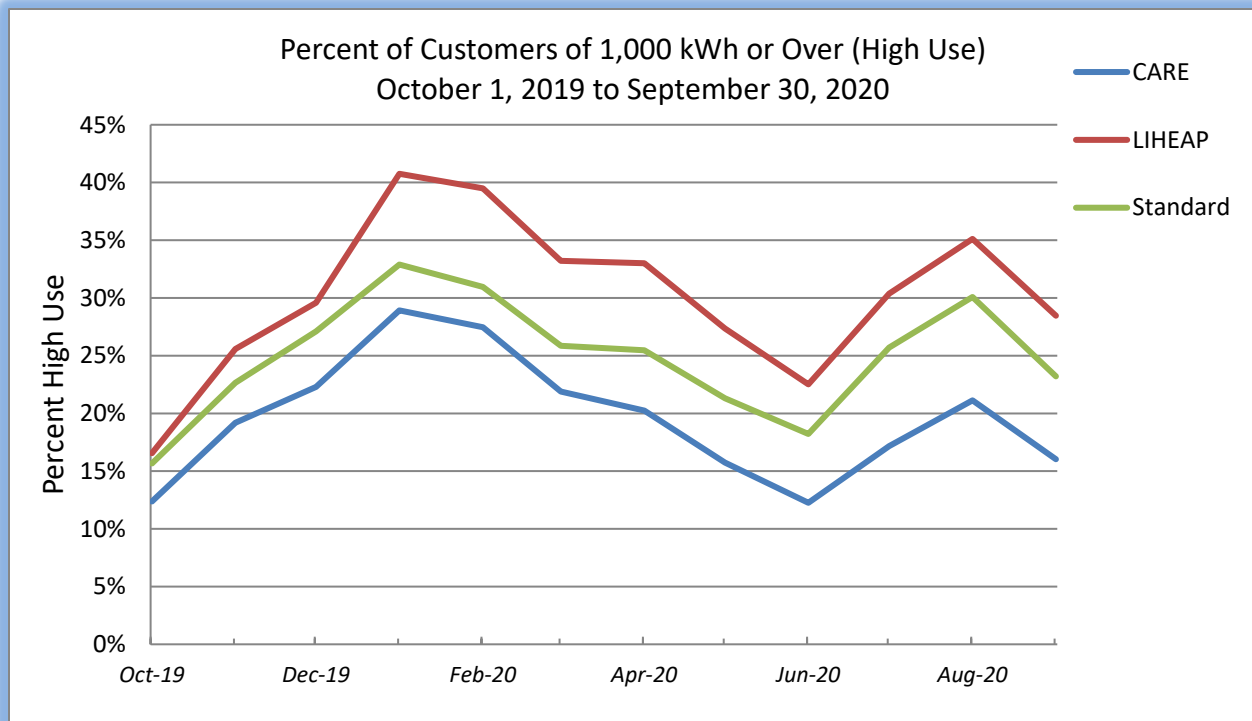


Figure 1- CARE Program Percent of Customers with High Energy Usage

b. Average Usage for High-Use Customers (1,000 kWh and above)

Figure 4 on page 13 shows the average monthly energy usage (kWh) for high-use CARE, LIHEAP, and standard Residential customers who used 1,000 kWh or more in each respective month. This figure calculates the average usage per month by dividing the total usage of the total number of participants with usage of 1,000 kWh or over per month in each respective month by the number of participants in each group. Figure 4 shows standard Residential customers who are not identified as low income have a higher average energy usage than the two low income identified groups (CARE and LIHEAP).

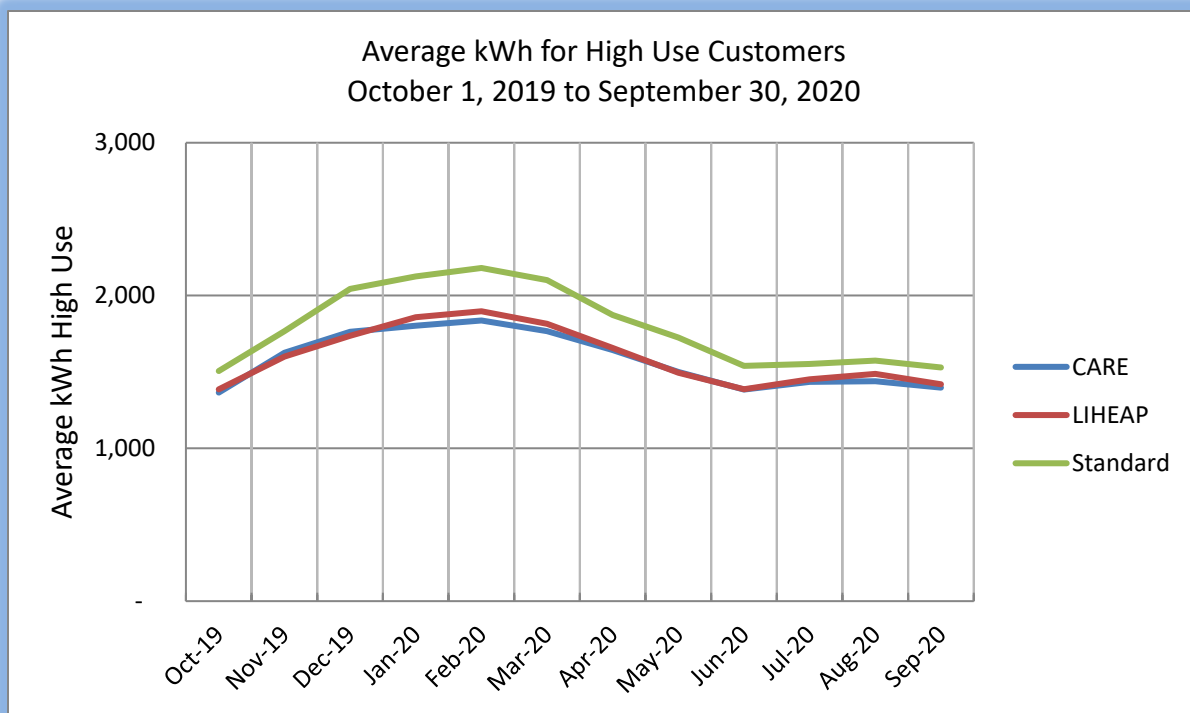


Figure 2- Average Monthly Energy for High Usage Customers

4. Participant Payment Frequency and Payment History

Table 2 on page 14 shows the payment frequency and history of CARE participants in program year 2020. CARE participants are a mix of LIHEAP-approved customers who may or may not have received LIHEAP grant assistance. Therefore, as in previous program years, the impact of payment frequency of the LIHEAP grant has not been isolated. The total number of payments in Table 2 includes both full and partial payments, as these two types of payments are not counted separately in the Company's billing system. Customer bill amounts and counts are limited only to month(s) in which the customer was identified as CARE or LIHEAP in the Company's billing system. In Table 2, total payments made by CARE participants and LIHEAP customers include energy assistance payments; this explains why the LIHEAP non-CARE customer total payments amount to more than the total bills. When the energy assistance amounts are excluded from the payments, CARE participants paid 75 percent of billed amounts, up from 67 percent, and LIHEAP non-CARE customers paid 63 percent of their billed amounts, consistent with prior year observations.

Table 2 - Payment Frequency and History

Customer Payment Frequency and History										
			Total Bills		Total Payments					
									Percent of Billed Amounts Paid	Bills Paid as Percent of Bills Issued (Count)
Line No.	Program Year	Designation	Count	Amount	Count	Amount		Energy Assistance		
1	10/2019-09/2020	CARE Participants	65,375	4,077,248	57,304	4,023,716		985,787	75%	88%
2		LIHEAP non-CARE	35,159	3,508,643	26,874	3,419,066	1/	1,208,695	63%	76%
3		LIHEAP	100,894	7,585,891	100,894	7,442,782	1/	2,194,482	69%	100%
1/ Payment Amount includes Energy Assistance and Percent of Bills Paid excludes Energy Assistance										

5. Disconnections and Reconnections

a. Disconnections

Minnesota Power believes it is critically important to work with customers to avoid disconnection of service and, in the event that disconnection does occur, to work with customers on timely reconnection. Minnesota Power follows the disconnection rules and processes as outlined in Minn. Stat. §§ 216B.096, 216B.0976, and 216B.098, and Minn. Rules. 7820.1000 through 7820.1300 and 7820.2400 through 7820.3000. These procedures are described in the Electric Service Regulations of Minnesota Power, Minnesota Power Electric Rate Book, Section VI, most specifically on pages 3.4 and 3.17.

In March 2020, Minnesota Power voluntarily took several proactive measures to provide protections and enhance safety during the peacetime emergency, following the issuance of the Governor's Emergency Executive Order.¹⁵ These actions included immediate suspension of disconnections for residential customers facing financial hardship in relation to the coronavirus pandemic; voluntary extension of Minnesota's Cold Weather Rule through May 31, 2020; encouraging customers to reach out regarding payment plans and options that reflect their unique financial resources and circumstances; and suspension of all non-emergency customer site visits. On March 30, 2020, these protective measures were expanded to include waiving late payment charges for

¹⁵ On March 13, 2020, Governor Tim Walz signed Emergency Executive Order 20-01, Declaring a Peacetime Emergency and Coordinating Minnesota's Strategy to Protect Minnesotans from COVID-19, as most recently extended through March 15, 2021 in Emergency Executive Order 21-08, https://mn.gov/governor/assets/EO%2021-08%20Final%20Signed%20and%20Filed_tcm1055-468348.pdf.

residential and small business (general service) customers; suspending disconnections for small business (general service) customers facing financial hardship in relation to the coronavirus pandemic; and waiving reconnection fees during normal business hours for residential and small business (general service) customers previously disconnected for non-payment. In its August 13, 2020 Order under Docket No. E,G-999/CI-20-375, the Commission formally ordered suspension of disconnections for residential customers; suspension of negative reporting to credit agencies for residential customers; and waiving reconnection, service deposits, late fees, interest, and penalties for residential customers. Per the Commission's August 13, 2020 Order, these protections are to remain in effect for the duration of the peacetime emergency with 60 days' notice before resuming these activities.

The number of participants who were disconnected during program year 2020 is shown in Table 3 on page 16. The process to run the report for Table 3, as related to CARE, is consistent with previous years. The Company used the date the disconnection was completed in the field when determining the customer affected, which is also in line with the Company's Safety, Reliability, and Service Quality ("SRSQ") report.¹⁶ Table 3 shows the number of CARE participants who were disconnected compared to the number of disconnections for all Residential firm customers and LIHEAP customers who did not participate in the CARE program. The disconnection rate was much lower in program year 2020 for all residential customers due to peacetime emergency protections. LIHEAP non-CARE customers had a disconnection rate of four percent in 2020 compared to 11 percent in 2019. CARE and all Residential customers had a disconnection rate of roughly one half percent compared to two percent in 2019.

¹⁶ SRSQ, Docket No.E015/M-20-404, Appendix A, April 1, 2020.

Table 3 - Disconnections

Disconnections – Period: October 1, 2019 to September 30, 2020			
Designation	Total Number of Customers [a]	Total Number of Disconnections [b]	Percentage of Disconnections [c]=[b]/[a]
CARE Participants	6,925	38	0.55%
LIHEAP Customers non-CARE	3,825	170	4%
All Residential Customers	118,256	607	0.51%

b. Reconnections

Table 4 provides the number of CARE program participants, LIHEAP non-CARE customers, and all Residential customers reconnected compared to those who were disconnected, as also shown in Table 3 above, column [b]. The reconnection numbers in Table 4 column [b] on page 17 are all reconnections that took place in program year 2020. The percentage rate of reconnections was generally higher in program year 2020 for CARE, LIHEAP non-CARE, and all Residential. This is largely due to additional reconnection outreach efforts during the peacetime emergency, including outbound calling. During times when the CWR applies, a customer who was previously a CARE participant may be reconnected if they enter into a payment plan. Once a customer was removed from the CARE program, this customer would be reflected in the standard Residential rate class.

Table 4 - Reconnections

Reconnections– Period: October 1, 2019 to September 30, 2020			
Designation	Total Number of Disconnections	Total Number of Reconnections	Percentage of Reconnections
CARE Participants	38	47	124%
LIHEAP Customers non-CARE	170	136	80%
All Residential Customers	607	514	85%

6. Participant Average Discount, Bill and Arrears

The Company provides the annual average participant's discount and arrearage amounts in the following sections.

a. Information Based on Annual Average Participants in the CARE Program

During program year 2020, the annual average number of participants in the CARE program was 5,371. Based on this group of participants as shown in Table 5, the average monthly discount, including the Company's match of arrears forgiveness and the monthly service charge discount, was \$21. To arrive at average total billed amount, the average for the total number of bills for CARE participants was used. The count of customers during program year 2020 who were enrolled in the CARE program at one point with arrears greater than 60 days old was 1,299. The average monthly arrearage amount per customer increased to \$26 in program year 2020. The average total billed amount in program year 2020 is lower at \$589 per year, or \$49 per month. In program year 2019, it was \$637 per year, or \$53 per month. The count of amount billed to CARE participants is limited to only the month(s) in which the customer was actually a CARE participant.

Table 5 - CARE Average Participant's Average Discount, Bill and Arrears Amounts

Average Bill and Arrears for CARE Average Participants, October 1, 2019 to September 30, 2020				
Designation	Number of Participants or Bills	Annual Total	Average	
			Annual Total	Monthly Total
	[a]	[b]	[c]=[b]/[a]	[d]=[c]/12
Average Bill Credit or Discount Amount 1/	5,371	\$1,370,283	\$255	\$21
Average Total Billed Amount 2/	6,925	\$4,077,248	\$589	\$49
Average Arrearage Amount	1,299	\$391,353	\$301	\$26
1/ Using the annual average number of CARE participants.				
2/Using the average for the overall number of bills for CARE participants, not all customers stayed in the program for 12 months.				

7. CARE Participant Billing Impacts

Table 6 on page 18 provides CARE program participants annual and monthly billing for the 6,925 participants, counted as number of bills.

Table 6 - CARE Participant Billing Impact

Average Bill and Arrears Billing Impact for CARE Average Participants, October 1, 2019 to September 30, 2020					
Designation	All CARE Participants			Average per Customer	
	Total Amount	Monthly Amount	Number of Customers	Annual Amount	Monthly Amount
CARE Customer Bill 1/	\$4,077,248	\$339,771	6,925	\$589	\$49
CARE Credit/Discount/Interim 2/	\$1,330,564	\$110,880	6,925	\$192	\$16
CARE Arrears 3/	\$39,719	\$3,310	118	\$337	\$28
1/ CARE customer bill includes the CARE discount.					
2/ This is an average for the overall number of bills for CARE participants, not all customers stayed in the program for 12 months. The CARE Rider is billed by applying the approved CARE discount to the standard Residential rate which was increased by the interim rate of 5.07 percent in Docket No. E015/GR-16-664. To ensure that the customer discount is proportioned to the authorized amount, the discount is also applied to the interim rate increase and shows as such on the customer's bill on a separate line item.					
3/ This is the arrears credit divided by the average number of bills that received an arrears credit.					

8. CARE Participant Electric Usage

In Table 7, the usage reported is strictly for the months in which a customer was identified as LIHEAP and enrolled in the CARE program. If a CARE customer stopped participating in the CARE program, the usage after being removed from the CARE program is not included in total annual usage. The Residential customer count and usage is inclusive of LIHEAP and CARE participants. Similarly, the LIHEAP customer count and usage is inclusive of CARE participants.

Table 7 - Customer Electric Usage

Customers' Electric Usage. Period October 1, 2019 - September 30, 2020			
Designation	Total Annual Usage	Number of Customers	Average Monthly Usage kWh
Standard Residential Customers	1,046,837,648	118,256	738
LIHEAP Customers	76,119,805	10,750	590
Total CARE Participants	46,674,009	6,925	562

9. Recent Order Requirement – Program Improvements and Outreach

In its January 5, 2018 Order, the Commission ordered the Company, in coordination with the CAO, Energy CENTS Coalition, and nonprofit organizations within Minnesota Power's territory, to discuss potential improvements to Minnesota Power's CARE program, the coordination of the program with the LIHEAP, and how best to enhance public outreach.

In its Sixth Annual Report, the Company reported extensively on its outreach efforts and, in its December 19, 2018 Order, the Commission indicated the Company had adequately addressed concerns on customer outreach. Minnesota Power has continued to work with the CAO to discuss low income customer challenges, identify enhanced outreach options, and discuss a process for expediting customer eligibility for programs. As a part of these efforts, Minnesota Power and the CAO have established bi-weekly meetings to review progress and explore additional ideas. This has informed additional outbound calling, cross-program referral, and COVID-19 specific outreach efforts, in addition to the other outreach efforts the Company has in place and ongoing. Further, Minnesota Power, along with other utilities, is in frequent contact with the Department of Commerce's ("Department") Energy Assistance Program office regarding LIHEAP specifically, particularly in light of the pandemic and the lower application rates for LIHEAP primary benefits and crisis funding. Importantly, as a part of these efforts, outreach to EAP Service Providers, community action agencies, Energy CENTS Coalition, and other local nonprofit organizations, has occurred.

Minnesota Power continues to leverage four major channels for outreach – targeted, mass, online/social media, and community events/collaborative services. Of these channels, the most directly impactful have been targeted outreach in the way of direct mailings and outbound phone calls as well as community events. In 2020, the pandemic has severely limited in-person events with work from home and remote participation options in place as part of safety protocol for employees, customers, and communities.

10. Compliance with Minnesota Statutes

The Commission required Minnesota Power to implement the CARE program, a low income affordability program per the requirements of Minn. Stat. § 216B.16 Sub. 15(b) with the following objectives:

- Lower the percentage of income that participating households devote to energy bills;
- Increase participating customer payments over time by increasing the frequency of payments;

- Decrease or eliminate participating customer arrears;
- Lower utility costs associated with customer account collection activities; and
- Coordinate the program with other available low income payment assistance and conservation resources.

The Company addresses each of the objectives in the subsections that follow.

a. Lower the percentage of income that participating households devote to energy bills

For program year 2020, Minnesota Power's CARE program did not directly link the customer's bill to the customer's income. However, with the affordability discount aspect of the program in place since January 1, 2020, customer income data is now being collected for a portion of CARE participants. As such, future reporting enhancements may better inform this objective. The affordability discount targets 3 percent of income for customer electric energy burden and therefore specifically lowers the percentage of income for those CARE participants, oftentimes significantly. Affordability discounts range from 3 percent to 100 percent with the average discount at about 53 percent. For CARE participants who enrolled as part of targeted outreach, the average discount was closer to 67 percent. Information from the Energy Assistance Program office of the Department has indicated just above five percent of income devoted to their electric bill for Minnesota Power customer households who are LIHEAP-approved. As the CARE program participants are drawn from the LIHEAP-approved customers, the percentage of income for LIHEAP-approved customers represents a proxy for CARE program participants on the flat discount.

b. Increase participating customer payments over time by increasing the frequency of payments

For program year 2020, CARE participants paid 88 percent of their bills; LIHEAP non-CARE customers paid 76 percent of their bills. These payment percentages exclude energy assistance funds for electric bills. In the analysis of program year 2016, the Department recognized that "absent a comparison of payment frequency for customers before and after participation in CARE, it is difficult to definitively determine whether MP's

(Minnesota Power) CARE Program increased frequency of payments or not.”¹⁷ The Company agrees, though the analysis seems to suggest that the CARE program has had some success in improving frequency of payment. However, it is observed that CARE participants paid 75 percent of their billed amounts compared to LIHEAP non-CARE who paid 63 percent (see Table 2 on page 14).¹⁸

c. Decrease or eliminate participating customer arrears

Minnesota Power implemented its Arrearage Forgiveness match in January 2016. In program year 2020, the Company matched \$39,719, with a monthly average of 118 customers who received an Arrearage Forgiveness match. Following is a monthly summary of the amount of arrears the Company matched, the monthly number of participants whose arrears were forgiven, and the average dollar match per month per participant (see Table 8 on page 22). The Company can confidently state that the total payment dollars matched reduced the duration of the customers’ arrears payments in addition to assisting customers in reducing arrears amounts.

¹⁷ Minnesota Department of Commerce, Division of Energy Resources, Docket No. E015/M-11-409, Section III.A.2, page 4, Susan L. Peirce Reply Comments to the Minnesota Power’s Fifth Annual Report, October 12, 2017.

¹⁸ Table 2, provides the amount of bills issued and paid as well as the count of bills issued and paid.

Table 8 - Arrearage Forgiveness Statistics

Arrearage Forgiveness Statistics			
Month	Amount Matched by MP	Number of Participants	Average \$/Participant
Oct-19	\$5,476	198	\$28
Nov-19	\$4,267	169	\$25
Dec-19	\$3,675	144	\$26
Jan-20	\$3,200	127	\$25
Feb-20	\$3,251	122	\$27
Mar-20	\$2,717	111	\$24
Apr-20	\$3,091	121	\$26
May-20	\$2,468	102	\$24
Jun-20	\$2,294	99	\$23
Jul-20	\$2,616	78	\$34
Aug-20	\$3,521	76	\$46
Sep-20	\$3,144	73	\$43
Total	\$39,719	1,420	\$28

d. Lower utility costs associated with customer account collection activities

Minnesota Power believes in the importance of working with customers by following all rules and regulations, including notices and the option of establishing a payment agreement to avoid disconnection of service. In the event that disconnection does occur, the Company works with customers on timely reconnection.

The disconnection rate in program year 2020 was much lower than previous years in light of peacetime emergency customer protections. Minnesota Power discusses below how to provide assistance to all identified low income customers without distinction, which will translate into more affordable bills and would in turn mean less disconnections under normal operating circumstances.

e. Coordinate the program with other available low income payment assistance and other resources

Minnesota Power's Energy Partners program focuses on collaborating with tribal governments and community agencies to provide income-eligible customers with educational resources and energy-efficient products and services to help them use energy more efficiently for the long term. These services are provided primarily through

working directly with the Fond du Lac Band of Lake Superior Chippewa and local community agencies, including the AEOA, Bi-County Community Action Program or BI-CAP, Kootasca Community Action, Lakes and Pines Community Action, Mahube-Otwa Community Action, and Tri-County Community Action or TCC.

Minnesota Power CIP team representatives typically participate in a wide range of low income-focused events and community events but due to the COVID-19 pandemic, most in-person events were cancelled in 2020. Minnesota Power adapted its program outreach efforts to include virtual events and low/no contact delivery channels, such as a virtual Energy Awareness Expo, direct mailing of energy saving kits and virtual energy audits for residential customers. More details about the program and participation are available in the 2019 CIP Consolidated Filing and will be provided in the upcoming 2020 CIP Consolidated Filing to be filed April 1, 2021.¹⁹

B. CARE Modifications Update

Since its inception in 2011, Minnesota Power has continually made improvements to its CARE program in an effort to better address the practical concerns of its customers and other stakeholders. Figure 1 on page 4 shows a timeline of these improvements.

Minnesota Power proposed modifications in its 2018 filing that were based on a collaborative stakeholder engagement process, consistent with the Commission's January 5, 2018 Order, Order Point 3. The proposed modifications were approved in the Commission's Order dated October 30, 2019 with an effective date of January 1, 2020 and are summarized as follows:

- Flat \$15 discount component for LIHEAP-approved customers who are senior, disabled, or legacy CARE participants. Those with energy bills under \$15 are ineligible in those months.
- Affordability discount component for LIHEAP-eligible customers, with the goal of keeping a household's electricity bill within three percent of its income on average, and applied as a percentage discount on monthly bills. Those with a calculated

¹⁹ *In the Matter of Minnesota Power's 2019 Conservation Improvement Program Consolidated Filing*, Docket No. E015/CIP-16-117.03 (May 1, 2020).

energy burden of less than three percent are ineligible for the affordability discount component.

- First-come, first-served affordability discount enrollment, with enrollment limited by available Program funding.
- Change the grace period deadline from May 31st to May 1st for LIHEAP-approval determination.
- Auto enrollment for the flat discount component and an annual application process for the affordability discount component, on a first-come, first-served basis.
- Minnesota Power administrative costs recoverable through the Affordability Surcharge.

These modifications were based on consensus priorities of the stakeholder group as follows:

- Mindful approach to any potential takeaways (unintended consequences) that a program change would have for existing CARE participants;
- Include a flat discount component, particularly for lower usage customers;
- Include a deep discount (referred to herein as “affordability discount”) component, particularly for higher usage customers;
- Support, and even preference for, in-house administration by Minnesota Power, especially with the addition of an affordability discount component; and
- Add senior and medical affordability components to the program.

Given the breadth of the enhancements, Minnesota Power asked, and the stakeholder group agreed, to continue with collaborative efforts with respect to reporting and outreach/communication plan recommendations. The stakeholder group also agreed to work together to propose recommendations for future annual reporting on the CARE program to measure impact and progress as well as identify areas for further enhancement, originally intended to be included with this Ninth Annual Report. Due to the necessary shift in focus in the pandemic context and resource constraints as preparations

are made for a billing system upgrade and meter data management system launch (collectively referred to as the C2M project), reporting enhancements will be deferred to the Tenth Annual Report. There also remains unanimous receptivity to collaborating on communication plans and expanded outreach opportunities, though many of those efforts have been more specifically concentrated on COVID-19 reporting and outreach, as discussed in greater detail in Docket No. E,G-999/CI-20-375.

Minnesota Power has implemented the program enhancements within its billing system and conducted outreach to legacy CARE participants to inform them of the program changes and provide an application for the affordability discount. Over 4,000 letters and applications were mailed in December, 2019: 1,720 were high use, current CARE customers; and 2,391 were the remainder of CARE legacy customers. As of September 30, 2020, about twenty percent of CARE participants were receiving the affordability discount and the remainder were receiving the flat \$15 discount. These figures are in line with the participation estimates as part of the program modification modeling, which indicated 1,000 – 1,500 affordability discount participants. While after the program year end date, the Company is pleased to report a highly successful re-enrollment rate for affordability discount participants of approximately 95 percent. This was the first re-enrollment since the program modifications were implemented. It involved significant outreach, including direct mailings and outbound calling.

IV. Conclusion

This Ninth Annual Report represents results for the CARE program for a program year that started under the prior design and then had modifications implemented January 1, 2020. In the midst of this, a peacetime emergency was declared in light of the COVID-19 pandemic. Minnesota Power voluntarily suspended disconnections and waived fees for residential customers beginning in March of 2020, ahead of the formal Commission Order suspending these activities that was issued in August of 2020. While the 2020 program year is by no means a representative year for program performance and comparative analysis, it does demonstrate that the CARE program modifications provided meaningful discounts for customers in a context that no one could have anticipated when these program modifications were developed. Overall, CARE program participation increased, surcharge amounts collected were closely aligned with discounts provided, and a tracker balance remains that will provide for enrollment and administrative flexibility as post-peacetime emergency transitions are considered. Minnesota Power continues to gain valuable insight through the collaborative stakeholder engagement process that began in 2018, albeit with a shifted focus in 2020, and is pleased to continue those efforts in 2021. The Company is confident in the modifications that have been implemented for program year 2020 and looks forward to reporting second year results in its next annual report. In the meantime, the Company appreciates the opportunity to provide the Commission information regarding the CARE program and respectfully requests that the Commission accept this Annual Report.

Dated: March 1, 2021

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tina Koecher", with a stylized, flowing script.

Tina S. Koecher
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Attachment A

Minnesota Power
Docket No. E015/M-11-409
Customer Affordability of Residential Electricity Tracker

Line No.		2019			2020										Annual Total
		Oct-19	Nov-19	Dec-19	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20		
1	<u>Affordability Surcharge Cash Collections</u>														
2	Residential	\$ 52,662	\$ 54,939	\$ 54,572	\$ 72,202	\$ 107,632	\$ 107,484	\$ 107,122	\$ 107,179	\$ 106,878	\$ 107,027	\$ 107,601	\$ 107,591	\$ 1,092,889	
3	General Service	\$ 13,861	\$ 13,907	\$ 13,980	\$ 19,296	\$ 31,504	\$ 32,182	\$ 32,284	\$ 32,225	\$ 32,241	\$ 32,510	\$ 32,407	\$ 32,471	\$ 318,869	
4	Large Light & Power	\$ 4,715	\$ 4,722	\$ 4,773	\$ 5,727	\$ 7,752	\$ 8,433	\$ 8,433	\$ 8,457	\$ 8,325	\$ 8,460	\$ 8,086	\$ 8,390	\$ 86,272	
5	Large Power	\$ 9,046	\$ 9,046	\$ 9,046	\$ 502	\$ 502	\$ 502	\$ 502	\$ 502	\$ 502	\$ 502	\$ 502	\$ 502	\$ 31,659	
6	Total Affordability Surcharge Cash Collections	\$ 80,284	\$ 82,614	\$ 82,371	\$ 97,727	\$ 147,390	\$ 148,601	\$ 148,342	\$ 148,363	\$ 147,946	\$ 148,500	\$ 148,596	\$ 148,954	\$ 1,529,689	
7	<u>Rate Discount Costs</u>														
8	Monthly Service Charge Discount/Affordability Dis	\$ 4,394	\$ 4,321	\$ 4,229	\$ 2,940	\$ 38,763	\$ 62,580	\$ 64,963	\$ 57,144	\$ 51,480	\$ 61,680	\$ 68,044	\$ 58,553	\$ 479,090	
9	Energy Charge Discount/Flat Discount (1/1/2020)	\$ 56,035	\$ 69,199	\$ 76,363	\$ 76,072	\$ 76,580	\$ 80,286	\$ 76,412	\$ 72,116	\$ 70,467	\$ 60,588	\$ 74,051	\$ 63,304	\$ 851,474	
10	Arrear Forgiveness Company Match	\$ 5,476	\$ 4,267	\$ 3,675	\$ 3,200	\$ 3,251	\$ 2,717	\$ 3,091	\$ 2,468	\$ 2,294	\$ 2,616	\$ 3,521	\$ 3,144	\$ 39,719	
11	Interim Discount	\$ -	\$ -	\$ -										\$ -	
12	Total Discount	\$ 65,905	\$ 77,787	\$ 84,267	\$ 82,212	\$ 118,594	\$ 145,583	\$ 144,466	\$ 131,727	\$ 124,242	\$ 124,884	\$ 145,616	\$ 125,001	\$ 1,370,283	
13	Program Admin Costs	\$ -	\$ -	\$ -	\$ 1,931	\$ 8,902	\$ 5,134	\$ 4,906	\$ 3,844	\$ 4,002	\$ 5,162	\$ 3,443	\$ 4,644	\$ 41,968	
14	<u>Interest Calculation</u>														
15	Monthly Tracker Balance Change	\$ 14,379	\$ 4,827	\$ (1,896)	\$ 13,585	\$ 19,895	\$ (2,116)	\$ (1,031)	\$ 12,792	\$ 19,702	\$ 18,455	\$ (462)	\$ 19,309		
16	Beginning of Month Balance	\$ 768,014	\$ 785,961	\$ 794,300	\$ 796,076	\$ 813,034	\$ 836,163	\$ 837,556	\$ 839,784	\$ 855,980	\$ 879,053	\$ 900,088	\$ 902,241		
17	Subtotal	\$ 782,393	\$ 790,788	\$ 792,404	\$ 809,661	\$ 832,929	\$ 834,048	\$ 836,525	\$ 852,575	\$ 875,682	\$ 897,508	\$ 899,626	\$ 921,550		
18	Monthly Average Balance	\$ 775,203	\$ 788,375	\$ 793,352	\$ 802,869	\$ 822,981	\$ 835,105	\$ 837,040	\$ 846,180	\$ 865,831	\$ 888,280	\$ 899,857	\$ 911,895		
19	Weighted Average Annual Prime Interest Rate 1/	5.42%	5.42%	5.42%	4.96%	4.96%	4.96%	4.75%	4.75%	4.75%	3.43%	3.43%	3.43%		
20	Monthly Interest	\$ 3,568	\$ 3,512	\$ 3,652	\$ 3,373	\$ 3,234	\$ 3,508	\$ 3,259	\$ 3,404	\$ 3,371	\$ 2,581	\$ 2,614	\$ 2,564	\$ 38,641	
21	End of Month Balance	\$ 785,961	\$ 794,300	\$ 796,056	\$ 813,034	\$ 836,163	\$ 837,556	\$ 839,784	\$ 855,980	\$ 879,053	\$ 900,088	\$ 902,241	\$ 924,113		

1/ <https://www.ferc.gov/enforcement-legal/enforcement/interest-calculation-rates-and-methodology>

**RIDER FOR CUSTOMER AFFORDABILITY OF RESIDENTIAL ELECTRICITY
(CARE)**

APPLICATION

Applicable to any Residential Service Customer taking service under Rate Code 20 (General) or Rate Code 22 (Space Heating) who is approved as qualified for the Low Income Home Energy Assistance Program (LIHEAP) by a designated social service agency (Agency) within Company's service territory during the program year (October 1 to September 30). Customers must receive certification annually through authorized Agency to be eligible for this Rider.

DEFINITIONS**SENIOR Customers:**

Seniors are those age 62 or older, as determined through the LIHEAP qualification process.

DISABLED Customers:

Disabled are those determined as disabled through the LIHEAP qualification process.

LEGACY CARE Customers:

Customers enrolled in the CARE Program as of September 30, 2019 or prior to the initial offering of the flat and affordability discounts under this Rider, whichever is later.

RATE MODIFICATION

All provisions of the Residential Service Schedule shall apply except as modified below:

FLAT DISCOUNT

Eligible Senior, Disabled, and / or Legacy CARE customers receive a \$15 flat discount in each monthly billing period.

AFFORDABILITY DISCOUNT

Eligible Seniors and / or Disabled, Customers Under 62 Years of Age with no Disability, and Customers with certified medical circumstances:

A customer using more than 3% of their annual household income for electric bill payments may be eligible for the Company's affordability discount. The Company will offer customers with the lowest income, and a history of high electric consumption, an affordability

Filing Date May 1, 2019**MPUC Docket No.** E015/M-11-409**Effective Date** January 1, 2020**Order Date** October 30, 2019**Approved by:** David R. Moeller**David R. Moeller****Senior Attorney & Director of Regulatory Compliance**

**RIDER FOR CUSTOMER AFFORDABILITY OF RESIDENTIAL ELECTRICITY
(CARE)**

discount with the goal of keeping a household's annual energy burden within 3% of its income, on average. The affordability discount will be applied as a monthly percentage discount on bill.

LOW-INCOME AFFORDABILITY PROGRAM SURCHARGE

For Customers taking service under: Residential Service (Rate Code 20, 22, and 23) except those residential customers who are qualified for LIHEAP, General Service (Rate Code 25), Large Light & Power (Rate Code 75), Large Power (Rate Code 74), Non-Contract Large Power (Rate Code 78) and Municipal Pumping (Rate Code 87) there shall be added to each service agreement, as designated above, on their monthly bill, a Low-Income Affordability Program Surcharge as specified below:

Residential (Except LIHEAP-qualified)	\$1.03
General Service	\$1.55
Large Light & Power	\$19.35
Large Power	\$62.81
Municipal Pumping	\$1.55

SERVICE CONDITIONS

1. In order to determine customer eligibility for this Rider, the Company will review customer's LIHEAP approval status, Customer billing information, approved LIHEAP benefits, household income, and / or arrears.
2. For Legacy CARE and Affordability Discount Customers, any past due bills for electric service will be spread over a maximum of 24 months and shall be put in a 24-month payment arrangement under the Arrearage Forgiveness program.
3. Customers taking service under this Rider will be encouraged to participate in Minnesota Power's energy conservation programs.
4. Customers must be LIHEAP eligible by May 1 of each program year to continue receiving service under this Rider. The program year starts October 1 and ends September 30 of the following year.
5. Customer must maintain an active account registered under Customer's name with the Company to be eligible for this Rider.

Filing Date <u>May 1, 2019</u>	MPUC Docket No. <u>E015/M-11-409</u>
Effective Date <u>January 1, 2020</u>	Order Date <u>October 30, 2019</u>

Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

**RIDER FOR CUSTOMER AFFORDABILITY OF RESIDENTIAL ELECTRICITY
(CARE)**

6. Qualified Customers are eligible to receive a discount under this Rider at only one residential location at any one time, and the Rider applies only to a qualified Customer's primary residence. This Rider will not be available when, in the opinion of the Company, the Customer's residency or occupancy is of temporary nature.
7. It is the Customer's responsibility to notify the Company if there is a change of address or eligibility status.
8. Application of this Rider shall be prospective, and the Rider discount shall not be applicable to past due bills.
9. If the participating Customer misses two consecutive payments, the Customer will be removed from this Rider and will become subject to standard collection activities for any past due amounts.
10. Refusal or failure of a Customer or Agency to provide documentation of eligibility acceptable to the Company may result in Customer removal from this Rider.
11. Customer may be re-billed for periods of ineligibility under the applicable standard rate schedule.
12. This Rider shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low income affordability programs.

ARREARAGE FORGIVENESS CONDITIONS

1. Current Legacy CARE and Affordability Discount participants with past-due arrears balances that satisfy Service Condition 1 are eligible for Arrearage Forgiveness.
2. Potential Arrearage Forgiveness applies to outstanding arrears at the time of CARE enrollment or as of the effective date of the Arrearage Forgiveness component, whichever is later.
3. The Arrearage Forgiveness shall in no event exceed the outstanding arrears balance.
4. The Company shall total the amount of arrears payments made by all CARE customers each month, and based on available funds in the CARE Rider Tracker, shall determine the percentage matching rate and shall match each Customer's monthly paid arrears amount

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Senior Attorney & Director of Regulatory Compliance

**RIDER FOR CUSTOMER AFFORDABILITY OF RESIDENTIAL ELECTRICITY
(CARE)**

by applying the determined percentage to reduce arrears in the same month. The initial matching rate will be 100 percent.

5. In the event a Customer applies, qualifies and receives fuel assistance, the fuel assistance amount may be used to pay the arrears amount. The Company shall not match amounts paid by a third party; however, any amount of arrears paid by the Customer any month shall be matched by the Company by applying the percentage of reduction in place as stated in Arrearage Forgiveness Condition 4 above.

6. If a Customer has new arrears, it means the Customer has missed at least two consecutive payments, therefore, Service Condition 9 applies, and the Customer shall no longer be eligible for the CARE Program or the Arrearage Forgiveness component.

Filing Date <u>May 1, 2019</u>	MPUC Docket No. <u>E015/M-11-409</u>
Effective Date <u>January 1, 2020</u>	Order Date <u>October 30, 2019</u>

Approved by: David R. Moeller
David R. Moeller
Senior Attorney & Director of Regulatory Compliance

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

AFFIDAVIT OF SERVICE VIA
ELECTRONIC FILING

Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 1st day of March, 2021, she served Minnesota Power's Ninth Annual Report in **Docket No. E015/M-11-409** 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