



May 19, 2021

**VIA ELECTRONIC 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. Sueffert:

Please find the attached Comments of the Energy CENTS Coalition in the above-referenced matter. If you have questions about these comments, please call me at 651-470-4500.

Sincerely,

*Pam Marshall*

Executive Director  
Energy CENTS Coalition

**State of Minnesota  
Before the Public Utilities Commission**

Katie Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph Sullivan	Commissioner
John Tuma	Commissioner

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

**Comments of the Energy CENTS Coalition**

The Energy CENTS Coalition ("ECC") submits these comments in support of Minnesota Power's ("MP" or "Company") Annual Customer Affordability of Residential Electricity ("CARE" or "Program") Program. ECC appreciates MP's engagement of stakeholders to improve CARE, including increased credit amounts, enhanced and sustained outreach efforts, and the coordination between CARE and the Company's low-income Conservation Improvement Program (CIP).

The Company's commitment to CARE is evidenced by the following reported outcomes:

- 1) Three times greater number of customer contacts in 2020 compared to 2019;
- 2) Increased CARE enrollment rate;
- 3) Increased CARE customer payment frequency;
- 4) A retention rate of 84%; and,
- 5) A reduction of the number of CARE customers in arrears.

At the same time, the Company achieved these results with only 2.4% administrative costs (less than one-half of the statutory threshold of 5%).

ECC recommends the Commission approve the Company's ninth annual CARE report and approve MP's request to recover Program administrative costs.

Respectfully submitted,

May 19, 2021



Pam Marshall  
Energy CENTS Coalition

**AFFIDAVIT OF SERVICE**

Pam Marshall certifies that on the 19<sup>th</sup> day of May 2021, she served, by electronic filing, Energy CENTS Coalition Comments 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, to the individuals on the attached service list.

*Pam Marshall*

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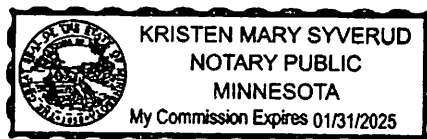
Pam Marshall

*KUS*

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Kristen Syverud

Subscribed and sworn to before me  
this 19<sup>th</sup> day of May 2021



Notary Public

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	No	OFF_SL_11-409_Official
Riley	Conlin	riley.conlin@stoel.com	Stoel Rives LLP	33 S. 6th Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-409_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	Yes	OFF_SL_11-409_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_11-409_Official
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_11-409_Official
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_11-409_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_11-409_Official
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_11-409_Official
William	Phillips	wphillips@aarp.org	AARP	30 E. 7th St Suite 1200  St. Paul, MN 55101	Electronic Service	No	OFF_SL_11-409_Official
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_11-409_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	No	OFF_SL_11-409_Official
Buddy	Robinson	buddy@citizensfed.org	Minnesota Citizens Federation NE	2110 W. 1st Street  Duluth, MN 55806	Electronic Service	No	OFF_SL_11-409_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_11-409_Official