



June 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
Docket No. E015/M-11-409
REPLY COMMENTS**

Dear Mr. Seuffert:

On March 1, 2021, Minnesota Power (or the "Company") submitted its Ninth Annual Customer Affordability of Residential Electricity ("CARE") Program Report ("Report") in the above-referenced Docket. The Department of Commerce, Division of Energy Resources ("Department") and the Energy CENTS Coalition ("ECC") submitted Initial Comments on March 19, 2021 and May 19, 2021, respectively, recommending that the Minnesota Public Utilities Commission ("Commission") accept the Report and approve recovery of the Company's administrative costs.

While the 2020 program year was by no means a representative year for program performance and comparative analysis, it does demonstrate the Company's commitment to CARE and that the CARE program modifications provided meaningful discounts for customers, particularly in a context that no one could have anticipated when these program modifications were developed. Overall, CARE program objectives were met through increased participation, expanded customer outreach, increased customer payment frequency, and a strong program retention rate. 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 occur. Importantly, 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.

Minnesota Power appreciates the affirmation of this strong program performance by the Department and ECC, and agrees with their recommendations to accept the Report and approve recovery of administrative costs. The Company is grateful for the time and work of the Department and ECC, both as stakeholder participants and in their review of CARE outcomes, and looks forward to a Commission hearing on this issue.

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

Yours truly,

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

Tina S. Koecher
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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 June, 2021, she served Minnesota Power's Reply Comments 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