COMMERCE DEPARTMENT

August 16, 2020

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E015/M-21-230

Dear Mr. Seuffert,

On April 12, 2020, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Comment* Period in the Matter of Minnesota Power's Compliance with Annual Safety, Reliability, and Service Quality Metrics for 2020.

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department). The Department recommends that the Commission **accept Minnesota Power's 2020, contingent upon the provision of additional information.** The Department is available to answer any questions the Commission may have.

Sincerely,

/s/DANIELLE D. WINNER
Rates Analyst

DW/ar
Attachment

COMMERCE DEPARTMENT

Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce
Division of Energy Resources

Docket No. E015/M-21-230

I. BACKGROUND

Minnesota Rules Chapter 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission ("Commission") to establish safety, reliability, and service quality ("SRSQ") standards for "utilities engaged in the retail distribution of electric service to the public" and to monitor performance as measured against those standards. There are three main annual reporting requirements set forth in the rule. These are:

1. The annual safety report (Minnesota Rules, part 7826.0400);
2. The annual reliability report (Minnesota Rules, part 7826.0500, subp. 1); and
3. The annual service qualify report (Minnesota Rules, part 7826.1300)

On January 28, 2020, the Commission issued its *Order Accepting Reports, Establishing Reliability Standards, and Requiring Additional Filings* ("January 2020 Order") (Docket No. E015/M-19-254). In Order Point 2 of the January 2020 Order, the Commission included Attachment B, which contained a list of updated annual reliability reporting requirements for the three electric utilities. These requirements are discussed in more detail in Section II.C.1. Annual Reliability Report below.

On December 18, 2020, the Commission issued its *Order Accepting Reports, Requiring Additional Filings, and Establishing Workshop* ("December 2020 Order") (Docket No. E015/M-20-404). The Commission's December 2020 Order accepted Minnesota Power's (MP or the Company) 2020 Safety, Reliability, and Service Quality Report covering the 2019 calendar year ("2019 SRSQ Report").

In its December 2020 Order, the Commission issued two Order Points that required MP to submit compliance filings within 30 days of the Order's issuance. These were:

- Order Point 2: Minnesota Power must file a compliance filing that includes the following data:
  i. Interruptions to the bulk power system for 2019
  ii. Causes of sustained outages, by service center for 2019, as a spreadsheet
  iii. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available), and
  iv. The longest experienced interruption by any one customer (or feeder, if customer level is not available).

- Order Point 15: Each utility must file a compliance filing in which engagement plans related to Emergency Medical Account status are explained.

On January 18, 2021, MP submitted its two compliance filings in Docket No. E015/M-20-404.

The Commission's December 2020 Order also included a number of Order Points relevant to Minnesota Power's instant filing, primarily related to reliability and service quality. These Order Points are discussed in more detail in Sections II.C.1. Annual Reliability Report and II.D.1. Annual Service Quality Report below.

On April 1, 2021, MP submitted its SRSQ Report for the 2020 calendar year in the instant docket ("2020 SRSQ Report").

On April 12, 2021, Commission staff issued a Notice of Comment Period requesting comments on the following topics:

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2020 Safety, Reliability, and Service Quality Metrics reports?
2. Should the Commission approve the utility's transition to benchmarking for its annual reliability numbers, including at a work center level?
3. Should the Commission take any action on the engagement plans related to Emergency Medical Account status?
4. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?
5. Are there other issues or concerns related to this matter?

II. FILING SUMMARY AND DEPARTMENT ANALYSIS

A. RESPONSE TO COMMISSION QUESTIONS

1. Should the Commission Accept Minnesota Power's 2020 Safety, Reliability and Service Quality Reports?

The Department recommends that the Commission accept Minnesota Power's Annual Safety and Service Quality Reports once the Company provides all required information. Additionally, the Department is awaiting additional information regarding the Company's proposed 2021 reliability metrics before making a recommendation regarding that aspect of MP's filing. The Company will be supplementing its petition sometime in the fall of 2021. That supplement will include reliability goals developed using the Institute of Electrical and Electronics Engineers (IEEE) benchmarking methodology. The Department hopes to file supplemental comments regarding its review of that information soon after Minnesota Power files that information.

2. *Proposed Transition to Benchmarking for Its Annual Reliability Number, Including at a Work Center Level*

The Department supports including the IEEE benchmarking analysis in the annual reports and is open to using the IEEE benchmarking analysis to set reliability goals if the data is available for Department analysis. The Department believes it is important for the data used to calculate the IEEE benchmarks be available for analysis if any issues with utility performance arise.

The Department also believes that the continued use of work centers is important. If the utilities continue to report performance based on work center, this allows the Commission to obtain a more accurate picture of which portions of the utilities' service territories are causing issues, which could allow for more information to be gained on the specific causes within each work center. Eliminating the more granular goals would reduce the Commission's ability to pinpoint potential problem areas and may allow utilities to deemphasize the areas in their service territories where service reliability is poor by combining them with areas in which service reliability is average or above average. Further, maintaining the current process of establishing work center goals would not require a variance from Minn. Rules 7826.0500 subp. 1, A-C and subp. 2.

The IEEE analysis is important in that it provides the Commission with a "comparable" group analysis for each of the utilities. This perspective has been lacking historically, so the Department supports the addition of this reporting requirement.

In addition, given that the IEEE benchmarking data is not available until the 3rd quarter of the following year, the Department supports a process wherein the utilities make a supplemental filing within 20 days of receiving the benchmarking data from IEEE. The Department and other interested parties would then have an opportunity to respond to that new information, if warranted. Ultimately, the IEEE benchmarking data will add valuable information and context as the annual reports are processed.

3. *Commission Action on the Engagement Plans Related to Emergency Medical Account Status*

The Department generally believes that an Investor-Owned Utility's engagement plans should be designed so that most customers are aware that the program exists. In response to the Commission's December 2020 Order, Minnesota Power, Otter Tail Power, and Xcel Energy each submitted compliance filings detailing each utilities engagement plans for Emergency Medical Account protections.

In its January 19, 2021 compliance filing in Docket No. E015/M-20-404, Minnesota Power stated:

> Minnesota Power continues to collaborate with representatives from Xcel Energy, Otter Tail Power and community-based organizations to identify ways for expanding outreach efforts and raising additional awareness about available options for energy assistance, including medical account status protections provided for under Minn. Stat. §216B.098, Subd. 5. This

> is included as part of an ongoing and evolving outreach plan. Examples of channels where outreach has been conducted include social media posts, customer bill inserts, MyAccount notifications, and web site references. These are in addition to the daily support and referrals provided through Call Center representative interactions where more direct program connections can be made based on the unique circumstances of the customer. Minnesota Power has planned additional outreach to healthcare and medical equipment personnel; however, timing has been delayed in light of the COVID-19 context and there are concerns about how effective traditional outreach channels such as mail will be in a considerable work from home context. That said, letters are scheduled to be sent in January 2021 with the goal of follow up emails, where possible.

Additionally, Minnesota Power, Otter Tail Power, and Xcel Energy have collaborated with the Clean Energy Resources Teams and the Citizens Utility Board to place links on their low-income energy assistance pages to each utility's respective webpage promoting energy assistance and necessary medical protections.

The Department concludes that MP's proposal for its engagement plan for its Emergency Medical Accounts is reasonable.

4. Effects of Electronic Utility-Customer Interactions on Customers

The Department believes that more information on customer interactions, particularly via the internet, is useful. While customers still contact the Company in great volumes via phone, it is clear that website interactions are substantial and provide customers with a great deal of information. Therefore, the Department concludes that the additional measures of electronic utility-customer interactions do help provide a more complete picture of how customers experience utility service.

Annual service quality reports provide insight into whether ratepayers are receiving safe and reliable service, as well as acceptable physical, financial, and call center services. Yet increasing levels of service are being provided online through utilities' websites, and often are the first place ratepayers connect with their utility.

To build on Order Point 14 the Commission's December 2020 Order,[1] the Department requests that the Company provide additional information in its annual reports for the next two reporting cycles, in order build baselines for web-based service metrics. Specifically, the Department requests that Minnesota Power provide, at a minimum, the following:

- The percentage uptime, to the second decimal, of the utility's:
  - general website
  - payment services
  - outage map and/or outage information page

[1] This Order Point introduced a number of reporting metrics concerning electronic communication from customers, and is discussed in greater detail in Section II.D. Service Quality below.

- The error rate percentage, to the third decimal, of the utility's payment services.
    - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

Additionally, the Department requests the utility discuss in reply comments whether it:

- has a chat feature on its website, and whether that chat feature is:
    - live and staffed by internal utility employees;
    - live and staffed by third-party vendor employees;
    - a chat bot; or
    - something else and/or a combination of the above options.
- uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

Gathering this data and information in this and next year's filing, across all utilities, should provide the Department with reasonable basis to recommend specific metrics and/or recommendations.

B. ANNUAL SAFETY REPORT

1. Safety standards

Minn. Rules pt. 7826.0400 requires the utility to file annual safety information including:

A. Summaries of all reports filed with the U.S. Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry for the calendar year; and
B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken as a result of injuries or property damage.

2. MP'S 2020 Safety Performance

MP reported 29 injuries in 2020, none of which required medical attention. The injuries resulted in a total of 102 lost workdays, or approximately 20 days per injury. The Company has not had a death reported since 2010.

In 2020, MP experienced 13 property damage claims totaling $40,594. The greatest single claim was for $24,086 due to a train derailment.

Based on its review of Minnesota Power's 2020 Safety Report, the Department concludes that the Company has fulfilled the requirements of Minn. Rules pt. 7826.0400.

C. ANNUAL RELIABILITY REPORT

1. Reliability standards

Minn. Rules pt. 7826.0500, subp. 1, A-K requires utilities to report the following reliability metrics for the prior year:

A. The utility's System Average Interruption Duration Index (SAIDI)[2] for the calendar year, by work center and for its assigned service area as a whole;
B. The utility's System Average Interruption Frequency Index (SAIFI)[3] for the calendar year, by work center and for its assigned service area as a whole;
C. The utility's Customer Average Interruption Duration Index (CAIDI)[4] for the calendar year, by work center and for its assigned service area as a whole;
D. An explanation of how the utility normalizes its reliability data to account for major storm;
E. An action plan for remedying any failure to comply with the reliability standards set forth in part 7826.0600 or an explanation as to why non-compliance was unavoidable under the circumstances;
F. To the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption;
G. A copy of each report filed under part 7826.0700;
H. To the extent technically feasible, circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance;
I. Data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of the American National Standards Institute (ANSI) for nominal system voltages greater or less than voltage range B;

[2] SAIDI measures the average outage duration per customer served.
[3] SAIFI measures the average number of interruptions per customer served.
[4] CAIDI measures the averageinterruption duration per customer interrupted.

J. Data on staffing levels at each work center, including the number of full-time equivalent (FTE) positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines; and
K. Any other information the utility considers relevant in evaluating its reliability performance over the calendar year.

The Commission's January 2020 Order, Order Point 2, Attachment B, Points 1-12 requires utilities to report the following reliability metrics:

1. Non-normalized SAIDI, SAIFI, and CAIDI values
2. SAIDI, SAIFI, and CAIDI, Momentary Average Interruption Frequency Index (MAIFI), [5] Customers Experiencing Multiple Interruptions (CEMI), and Customers Experiencing Lengthy Interruptions (CELI) normalized values calculated using the IEEE 1366 Standard.
3. MAIFI – normalized and non-normalized.
4. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.
5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
6. CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.
7. The longest experienced interruption by any one customer (or feeder, if customer level is not available).
8. A breakdown of field versus office staff as required Minn. Rules 7826.0500 subp. 1, J, including separate information on the number of contractors for each work center.
9. Estimated restoration time accuracy, using the following windows:
    i. Within -90 minutes to 0 of estimated restoration time
    ii. Within 0 to +30 minutes of estimated restoration time
10. IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI from the IEEE benchmarking working group

[5] MAIFI provides a measure of the average number of short outages—an interruption in electrical service that MP defines as lasting fewer than five minutes—that an average customer experiences in a year.

11. Performance by customer class:

		Average System Availability Index (ASAI)	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized					
	Normalized					
Commercial	Non-normalized					
	Normalized					
Industrial	Non-normalized					
	Normalized					

If reporting by class is not yet possible, an explanation of when the utility will have this capability.

12. Causes of sustained customer outages, by work center.

The Commission's December 2020 Order, Order Points 4-8 requires utilities to include the following in its reliability report:

4. The Commission granted a variance to Minn. R. 7826.0500, subp. 1, item G, applicable to all three utilities. The utilities instead were required to file a summary table that includes in the information contained in the reports, similar to Attachment G of Xcel Energy's 2019 SRSQ Filing.
5. Reliability metrics (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.
6. A discussion and proposal for transitioning to a full benchmarking approach for setting reliability standards. This Order Point only applies to SRSQ Reports due April 2021 covering the 2020 calendar year.
7. For service territory-wide performance, each electric utility's reliability goals are set based on the benchmarking standards released by IEEE.
    - The Commission set MP's reliability metrics at the IEEE benchmarking second quartile for medium utilities; the Commission further directed MP to make a supplemental filing to the Company's 2020 report 30 days after IEEE publishes its 2020 benchmarking results, with an explanation of any missed standards.

8. For service center level reliability metrics, each electric utility's reliability goals are set based on the traditional five-year rolling average.
    - The Commission set MP's service center reliability standards at the 2016 levels, as shown in the following table.[6]

	SAIDI	SAIFI	CAIDI
MP 2016 Standard	98.19	1.02	96.26

In the following sections, the Department attempted to combine topics where appropriate.

2. *MP's 2020 Reliability Performance*

a. MP's 2020 System-Wide Reliability Metrics

Minnesota Power reported both normalized and non-normalized SAIDI, SAIFI, CAIDI, MAIFI, and ASAI metrics for its territory-wide performance in Appendix A, pages 6-8 of its filing.

To normalize its data, MP used the IEEE 2.5 beta method, which excludes data due to major events such as large storms. To determine which singular events should be excluded from the reliability metrics data, MP compares the SAIDI for individual events to IEEE's Major Event Threshold. In cases where a storm or other event experienced by MP has a greater SAIDI than the IEEE Major Event Threshold, those major events are removed from the data. In 2020, there were three major events removed from the data. As noted in Appendix A to the Company's report, this is consistent with the number of events excluded in recent years.

The non-normalized and normalized system-wide metrics reported by MP are shown in the following table:

Table 1. Minnesota Power's 2020 System-Wide SAIDI, SAIFI, CAIDI, MAIFI, and ASAI Metrics, Normalized and Non-Normalized

	MP's 2020 System-Wide Performance, Non-Normalized	MP's 2020 System-Wide Performance, Normalized (IEEE 2.5 beta method)
SAIDI (in minutes)	179.43	122.51
SAIFI (# of outages)	1.42	1.22
CAIDI (outage min/customer)	126.13	100.5
MAIFI (outage min/customer)	4.90	4.36
ASAI (percentage system availability)	99.966%	99.977%

[6] Minnesota Power's filing states that levels were set at 2017 levels; the Department understands this to mean levels set in the 2017 SRSQ Report that covered the 2016 calendar year.

Minnesota Power then compared its normalized system-wide performance to the 2020 goals set in the Commission's December 2020 Order. In that Order, the Commission directed MP to compare its system-wide performance metrics to the 2nd quartile IEEE benchmarking metrics for medium-sized utilities (with 100,000 to 1 million customers), submitting a supplemental filing 30 days after this data becomes available. The Department expects this data to become available in the third quarter of 2021, and for MP to make its supplemental filing in the fall of 2021. Minnesota Power was supportive of continuing to use IEEE's benchmarking standards for setting reliability metrics goals at the system-wide level, providing a discussion and proposal on pages 21-24 of its filing.

Based on its review of Minnesota Power's 2020 system-wide reliability requirements reporting, the Department concludes that Minnesota Power appears to have fulfilled the requirements of Minnesota Rules, part 7826.0500, subp. 1, A, B, C, and D.

The Department further concludes that Minnesota Power appears to have fulfilled the Commission's January 2020 Order, Order Point 2, Attachment B, Points 1, 3, 10, and parts of 2. However, the Department notes that Point 2 of Attachment B of the Commission's January 2020 Order requires utilities to normalize data using the "IEEE 1366 Standard." The Department requests that in reply comments, the Company explain how the IEEE 2.5 beta method used by the Company to normalize data meets this requirement.

Finally, Department concludes that Minnesota Power appears to have fulfilled part of Order Point 6 from the Commission's December 20 Order (the remaining part is fulfilled through MP's discussion on work center reliability metrics, discussed in the following section).

b. MP's 2020 Work Center Reliability Metrics

In prior years, Minnesota Power has considered its entire service territory to be a singular work center. This year, however, the Company divided its service territory into the following work centers: Central, Northern, and Western. The reliability metrics associated with these work centers are reported in pages 25-26 of MP's filing, and are shown in the following table:

Table 2. Minnesota Power's 2020 Work Center Reliability Metrics

	Central	Northern	Western
SAIDI (in minutes)	90.42	184.82	146.86
SAIFI (# of outages)	1.21	1.17	1.27
CAIDI (outage min/customer)	74.73	157.97	115.64
MAIFI (outage min/customer)	4.93	2.56	4.32

The Company did not specify whether this data is normalized or non-normalized; the Department notes that MP does not have to provide both normalized and non-normalized values at the work center level to be in compliance with Minnesota Rules and Commission Orders, but asks that the Company specify which is used in future filings.

Minnesota Power compared its normalized work center performance to the 2020 goals set in the Commission's December 2020 Order. In that Order, the Commission set MP's goal at the 2016 goal levels, which were based on rolling five-year historical averages. The following table shows the Company's results:

Table 3. Minnesota Power's 2020 Work Center Reliability Results Compared to 2020 Work Center Reliability Goals

	Central			Northern			Western		
	SAIDI	SAIFI	CAIDI	SAIDI	SAIFI	CAIDI	SAIDI	SAIFI	CAIDI
2020 Goals set by Commission's December 2020 Order, which uses the 2016 Standard based on rolling five-year average	98.19	1.02	96.26	98.19	1.02	96.26	98.19	1.02	96.26
MP's 2020 Results	90.42	1.21	74.98	184.82	1.17	158.58	184.82	1.27	115.4
Goal Met?	Yes	No	Yes	No	No	No	No	No	No

When comparing its work center reliability performance with its 2020 goals, MP met its SAIDI and CAIDI goals for its Central work center, but did not meet its goals for any other metrics. Minnesota Power was supportive of moving away from the five-year rolling average goal and towards IEEE's benchmarking standards for this reporting work center reliability, providing a discussion and proposal on pages 21-24 of its filing.

Minnesota Power also provided work center staffing data, including the number of full-time employees, in Table 5 on page 24 of Appendix A to its filing. The Department summarizes the Company's metrics in the following table:

Table 4. Minnesota Power's 2020 Work Center Reliability Metrics, Staffing Data

	Central	Northern	Western
Line Operations Field Workers	54	30	31
Line Operations Support	48.5	13	13
Engineering Support	57	8	13
Contractors	~70		

Based on its review of Minnesota Power's 2020 work center reliability requirements reporting, the Department concludes that Minnesota Power appears to have fulfilled the requirements of Minn. Rules pt. 7826.0500, subp. 1, J. The Department further concludes that Minnesota Power appears to have fulfilled the Commission's January 2020 Order, Order Point 2, Attachment B, Point 8. Finally, the Department concludes that Minnesota Power appears to have fulfilled the Commission's December 20 Order, Order Point 8 and the remaining part of Order Point 6.

c. MP's 2020 Bulk Power Supply Facility Reliability Metrics

Minn. Rules pt. 7826.0500, subp. 1, F requires utilities to report information on each interruption to a bulk power supply facility during the calendar year. Minn. Rules pt. 7826.0500, subp. 1, G requires utilities to submit a copy of each service interruption report submitted to the Commission's Consumer Affairs Office (CAO).[7] The Commission's December 2020 Order granted all three utilities a variance to Minn. Rules pt. 7826.0500, subp. 1, G; in lieu of these report copies, each utility may simply submit a summary table of the reports in its annual SRSQ Report.

In Table 16, pages 42-44 of its filing, Minnesota Power filed such a summary table. The summary table listed 50 events.

In Appendix A, pages 11 through 19, Minnesota Power provided a description of each interruption that occurred at a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and remedial steps that were taken or will be taken to prevent further interruption. In this list, Minnesota Power listed a total of 64 events.

In Appendix B, Minnesota Power provided the copies of reports filed with the Commission's CAO; these appear to correspond with the interruptions listed in Table 16 of the Company's filing. There are a total of 50 event reports.

Based on its review of Minnesota Power's 2020 bulk power supply facility reliability reporting metrics, the Department concludes that the Company appears to have fulfilled the requirements of Minn. Rules pt. 7826.0500, subp. 1, F and G, as well as the Commission's December 2020 Order, Order Point 4.

The Department notes that although it may wish to do so, the utility no longer is required to provide the reports currently contained in Appendix B, provided it provides a table such as Table 16 of its filing. However, it is unclear to the Department why Appendix A provides a list of 64 bulk power supply events and why Table 16 provides a list of 50 major service interruptions. The Department requests that in reply comments Minnesota Power explain the difference between the events listed in Appendix A and those listed in Table 16.

d. MP's 2020 Feeder Reliability Metrics

In Appendix A, pages 19-23 of its filing, MP reported its worst performing feeders. In past years, as noted previously, the Company considered its entire service territory to be one work center, and would report the four worst performing feeders (2 urban and 2 rural) for its entire system. In this filing, MP reported the four worst-performing feeders (2 urban and 2 rural) for each of its three work centers, for a total of 12 feeders. The Department summarizes the 2020 information in the following table.

[7] Major service interruption reports are required to be submitted to the Commission's CAO per Minn. Rule 7826.0700.

Table 5. Summary of Minnesota Power's 2020 Worst-Performing Feeders in Urban Areas in Central, Northern, and Western Work Centers

	Criteria	Work Center	Circuit	# of Customers	SAIDI	SAIFI	CAIDI
Urban	High SAIDI	Central	15th Ave W 233	74	361.23	6.72	53.78
		Northern	Aurora 2	724	879.29	2.04	430.43
		Western	Long Lake 542	3	1023.33	7.00	146.19
	High CAIDI	Central	Cloquet 409	1942	294.62	4.58	64.28
		Northern	Aurora 2	724	879.29	2.04	430.43
		Western	Akeley 1	400	600.15	1.28	469.78
Rural	High SAIDI	Central	Burnett 408	372	856.88	4.04	212.22
		Northern	Giants Ridge 1	288	1031.28	2.17	475.24
		Western	Ten Mile Lake 2	374	1035.62	5.73	180.74
	High CAIDI	Central	Denham 6431	1254	610.83	4.37	139.65
		Northern	Giants Ridge 1	288	1031.28	2.17	475.24
		Western	Backus 1	698	659.35	4.39	150.30

For each feeder, MP provided information on the events that contributed to poor performance, as well as what steps the Company took to improve performance. The Department notes that the highest SAIDI and highest CAIDI were the same feeder for the Northern work center in both the urban and rural settings.

The Department reviewed MP's historical data for worst-performing feeders and notes that none of the feeders reported in the 2020 SRSQ appear to present recurring reliability issues. It appears that the only one of these feeders that has been amongst the worst-performing in the past ten years has been the Denham 6431 feeder in 2017.

Minnesota Power also included a table of planned grid modernization investments on pages 16-20 of its 2020 SRSQ Report, along with details about how these improvements will help reliability. While this information helps to fulfill requirements concerning how MP intends to address missed reliability goals, the Company did not include historical reliability metrics associated with those investments, as required in Order Point 5 of the Commission's December 2020 Order. The Department summarizes these reported investments in the following table, along with the information required by that Order:

Table 6. MP's 2020 Reliability Metrics by Feeder, Pre- and Post- Grid Modernization Updates, as Required by Commission Order

Project Name	Anticipated In-Service Date	Feeder	Pre-Update Feeder Reliability Metrics (Normalized and Non-Normalized SAIDI, SAIFI, CAIDI, MAIFI)	Post-Update Feeder Reliability Metrics (Normalized and Non-Normalized SAIDI, SAIFI, CAIDI, MAIFI)
Colbyville Switchgear Replacement	2022			
Gary Switchgear Replacement	2023			
Haines Rd Switchgear Replacement	2024			
Meadowlands Substation Modernization	2021-2024			
Long Prairie Substation Modernization	2021-2024			
Verndale Substation Modernization	2021-2024			
Little Falls Substation Modernization	2021-2024			
Nashwauk Substation Modernization	2021-2024			
Wrenshall Substation Modernization	2021-2024			

Further, MP reported some additional grid modernization programs such as: Trip Savers, Mobile Workforce application, and an inspection app. It is unclear to the Department whether these or any additional projects mentioned can be included in the Company's feeder-level reliability metrics.

Based on its review of Minnesota Power's 2020 feeder reliability metrics reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.0500, subp. 1, E and H, as well as the Commission's January 2020 Order, Order Point 2, Attachment B, Point 12.

However, the Department concludes that Minnesota Power has not submitted information required by Order Point 5 of the Commission's December 2020 Order. To comply with the Commission's Order, MP should report the pre-update historical averages for SAIDI, SAIFI, CAIDI, and MAIFI (both normalized and non-normalized) for each feeder associated with each of these projects. As the projects come into service, the Company should begin reporting post-update reliability metrics with each feeder. Finally, the Company should report feeder reliability metrics of any new grid modernization projects in future filings, or any overlooked by the Department in the current filing.

e. MP's 2020 Customer Class Reliability Metrics

On page 42 of its 2020 SRSQ Report, MP included a graph of non-normalized reliability by customer class summarized by the Department in the following table:

Table 7. Minnesota Power's 2020 Reliability Metrics by Customer Class, as Submitted by MP

Class	"Average reliability by customer class. These averages were calculated by taking outage numbers from each class and determining their overall reliability by time served." (MP, Page 42)
Residential	99.97115%
Commercial	99.99480%
Industrial	99.99991%

The Department is unclear about how these percentages are calculated. However, the Department notes that this does not comply with the Commission's January 2020 Order, Order Point 2, Attachment B, Point 11, which requires utilities to report the following:

Table 8. Minnesota Power's 2020 Reliability Metrics by Customer Class, as Required by Commission Order

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized					
	Normalized					
Commercial	Non-normalized					
	Normalized					
Industrial	Non-normalized					
	Normalized					

Based on its review of Minnesota Power's 2020 customer class reliability reporting requirements, the Department concludes that MP does not appear to have submitted information required by the Commission's January 2020 Order, Order Point 2, Attachment B, Point 11. For the Company to comply with that Order, the Company submit an updated Table 8 in reply comments, or alternatively, "If reporting by class is not yet possible, an explanation of when the utility will have this capability."

f. MP's 2020 Customer-Level Reliability Metrics

Minnesota Power reported that in 2020, there were 23 instances of known instances in which nominal electric service voltages on the utility's side of the meter did not meet the standards of ANSI for nominal system voltages greater or less than voltage range B. The Company reported these instances by account number, cause, and voltage. The Department is unclear if "account number" represents customer account numbers; if so, the Department suggests removing this information from future reports and instead tracking each instance by date or another less identifying piece of data.

Minnesota Power also included on pages 49-51 of its filing four charts detailing its normalized and non-normalized CEMI and CELI results for 2020. MP's 2020 results are summarized in the following tables:

Table 9. Minnesota Power's 2020 System-Wide CEMI Metrics at 3+,4+,5+, and 6+ Interruption Levels, Normalized and Non-Normalized

Number of Interruptions	MP's System-Wide Non-Normalized	Normalized
3+	6.23%	5.17%
4+	3.12%	3.39%
5+	0.26%	0.26%
6+	0.93%	0.02%

Table 9 demonstrates that when major events are included in the data, 6.23% of MP's customers experienced more than 3 interruptions in 2020, whereas this percentage drops to 5.17% when the data is normalized. By contrast, non-normalized data shows that almost 1% (0.93%) of customers experienced more than 6 interruptions, whereas normalized data shows that near 0% (0.02%) of customers experienced more than 6 interruptions.

Table 10. Minnesota Power's 2020 System-Wide CELI Metrics at 6+,12+, and 24+ Levels, Normalized and Non-Normalized

Length of Interruptions	MP's System-Wide Non-Normalized	Normalized
6 hours +	6.14%	3.85%
12 hours +	2.71%	1.25%
24 hours +	0.16%	0.00%

Similarly as with the CEMI metrics, when CELI metrics are normalized at shorter intervals, the impact is less than when the metrics are normalized at longer intervals. For example, the percentage of customers experiencing interruptions greater than 6 hours goes from a non-normalized value of 6.14% to a normalized value of 3.85%. By contrast, the percentage of customers experiencing interruptions greater than 24 hours goes from a non-normalized value of 0.16% to a normalized value of 0.00%.

Based on its review of Minnesota Power's 2020 customer-level reliability metrics reporting, the Department concludes that MP appears to have fulfilled the Commission's January 2020 Order, Order Point 2, Attachment B, Points 4, 6, and parts of 2. However, the Department was unable to confirm that the Company submitted either Points 5 or 7 of the information required by Order Point 2, Attachment B of the Commission's January 20 Order:

5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
7. The longest experienced interruption by any one customer (or feeder, if customer level is not available).

For Minnesota Power to comply with these parts of the Commission's January 2020 Order, the Department requests that MP submit this information in reply comments.

g. Additional Reliability Reporting Requirements

The Department notes that the Commission's January 2020 Order, Order Point 2, Attachment B, Point 9 requires utilities to submit the following in their reliability reports:

9. Estimated restoration time accuracy, using the following windows:
    i. Within -90 minutes to 0 of estimated restoration time
    ii. Within 0 to +30 minutes of estimated restoration time

The Department notes that the Commission's Order did not appear to specify a level at which this data should be reported (ie, system-wide level, service center level, etc.). However, the Department is unable to find such a metric in Minnesota Power's filing at any reporting level.

The Department concludes that Minnesota Power does not appear to have fulfilled the Commission's January 2020 Order, Order Point 2, Attachment B, Point 9. To comply with this Order, the Department requests that MP submit the required information in reply comments, at the level in which the necessary data is most easily accessible to the Company.

D. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules, part 7826.1300 requires each utility to file the following information:

1. Meter Reading Performance (7826.1400),
2. Involuntary Disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),
4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

The Commission's December 2020 Order Points 14 and 16 require utilities to include the following in its service quality report:

> 14. For the two reporting cycles following the Commission's 2020 Order, each utility must report the data listed below, to the extent feasible. The Commission further specified that if a utility is unable to report the information, it must provide an explanation as to why the information is not filed and the plans for reporting the information in the future.
>
> a. Yearly total number of website visits;
> b. Yearly total number of logins via electronic customer communication platforms;
> c. Yearly total number of emails or other customer service electronic communications received; and
> d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R. 7826.1700.
>
> 16. Each utility must file revised complaint categories.

1. Meter Reading

The following information is required for reporting on monthly meter reading performance by customer class:

A. the number and percentage of customer meters read by utility personnel;
B. the number and percentage of customer meters self-read by customers;
C. the number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months;
D. data on monthly meter reading staffing levels, by work center or geographical area.

Minnesota Power reported on Company-read versus Customer-read meter readings on pages 27-31 of Appendix A to its filing. The Department summarizes the provided information in the following table:

Table 11. Minnesota Power's 2020 Company-Read vs. Customer-Read Meter Reading Figures by Customer Class

		Residential	Commercial	Industrial	Municipal	Lighting
Company	Number of Company Meter Reads (Annual Average)	131,073	20,972	394	269	367
	Total Potential Number of Company Meter Reads (Annual Average)	132,916	21,047	395	270	367
	Number of Company Reads as a Percentage of Total Potential Number of Company Meter Reads	98.59%	99.56%	99.7%	99.66%	100%
Customer	Number of Customer Meter Reads (Annual Average)	63	12	Not reported	Not reported	Not reported
	Number of Customer Reads as a Percentage of Total Potential Number of Company and Customer Reads	0.04%	0.01%	Not reported	Not reported	Not reported

Minnesota Power further reported that it had a total of 132 meters unread for between six and twelve months, and no meters unread beyond twelve months. In all instances of unread meters, the Company indicated the reason was an inability to access the meter. MP stated that it leaves notices and sends follow-up letters and calls to customers regarding missed meter readings.

The following table summarizes the number of meters not read in one year or more for the past five years.

Table 12. Meters Not Read, Company vs. Customer Read, 12 months versus over 12 months

	Company Read		Customer Read	
	12 months	Over 12 months	12 months	over 12 months
2016	6	12	1	0
2017	0	0	0	0
2018	0	0	0	0
2019	3	0	0	0

Based on its review of Minnesota Power's 2020 meter reading service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1400.

2. Involuntary Disconnections

In 2020, MP sent 5,502 disconnection notices to residential customers, 401 notices to commercial customers, and 22 notices to industrial customers. Due to the COVID-19 pandemic and Minnesota Governor's Peacetime Emergency Order and related residential customer protections, disconnection notices for residential customers ceased in May 2020. A total of 2,845 residential customers sought and received Cold Weather Rule (CWR) protection. MP involuntarily disconnected a total of 281 residential customers, 17 commercial customers, and zero industrial customer. A total of 145 residential customers, or 51.6%, were restored within 24 hours. A total of 194 residential customers had service restored upon entering a payment plan.

Table 13. Residential Customer Involuntary Disconnections

	Received Disconnect Notice	Sought CWR Protection	% Granted	Disconnected Involuntarily	Restored within 24 hours	Restored by Entering Payment Plan
2016	12,191	2,916	100%	1,933	213	634
2017	17,454	3,475	100%	2,668	1,284	1,680
2018	18,961	4,311	100%	2,492	1,219	1,592
2019	16,049	4,232	100%	2,138	1,056	1,357
2020	5,925	2,845	100%	298	149	206

Based on its review of Minnesota Power's 2020 involuntary disconnection service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1500.

3. Service Extensions

The following information is required for reporting on service extension request response times[8] by customer class and calendar month:

A. the number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service; and

B. the number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

[8] MP measures service extension request response times as the interval between the date service was installed and the requested service date, even in cases where the requested service date cannot be met due to a delay caused by the customer.

For new service extension requests, MP reported a total of 929 residential installations, 711 commercial installations, 3 industrial installations, and 27 municipal installations. MP met the requested in-service date for residential installations 54.25% of the time, and its commercial installations 54.15% of the time, its industrial installations 100% of the time, and its municipal installations 48.15% of the time. MP stated that the primary reason for not meeting an in-service date in 2020 were failures to update dates (24.49%), MP delay due to workload (16.4%) and customer not read (5%).

Table 14. New Service Extension Requests Combined Residential, Commercial, Industrial, & Municipal

	Total Number of Installations	Request Date Met	% Request Date Met
2016	1,476	835	56.6%
2017	1,747	1,338	76.6%
2018	2,118	1,374	64.9%
2019	1,314	525	40.0%
2020	1,670	902	54.2%

For extension requests to a previously served location, MP reported a total of 1,472 residential installations, 463 commercial installations, 18 industrial installations, and 11 municipal installations. MP met the requested in-service date for residential installations 86.01% of the time, commercial installations 81.21% of the time, industrial installations 100% of the time, and municipal installations 81.8% of the time. MP stated that the primary reason for not meeting an in-service date in 2020 were failures to update dates (83.45%), MP delay due to workload (4.48%) and customer not read (2.76%). MP stated that it will be changing the way it accounts for delayed customers due to dates not updated for project, as most of these delays are due to customer meters installed the day after the customer is "energized" (See MP's Appendix A, page 43).

Table 15. Previously Served Customer Service Extension Requests: Combined Residential, Commercial, Industrial, & Municipal

	Total Number of Installations	Request Date Met	% Request Date Met
2016	2,652	2,463	92.9%
2017	4,563	4,032	88.4%
2018	4,544	3,940	86.7%
2019	6,535	5,893	90.2%
2020	1,964	1,669	85.0%

Based on its review of Minnesota Power's 2020 service extension service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1600.

4. Call Center Response Times

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Minnesota Rules, part 7826.1200 requires utilities to answer 80% of calls made to the business office during regular business hours and 80% of all outage calls within 20 seconds.

Minnesota Power reported that in 2020, the Company answered 82% of calls during business hours (7:00 am to 5:30 pm) within 20 seconds, and that the Company met or exceeded the 80% goal threshold in 7 out of 12 months of the year. Minnesota Power also provided a graph showing the number of business hour calls in each month compared to the percentage of calls answered within 20 seconds. Minnesota Power reported that in 2020, the Company answered 51% of calls during non-business hours (5:30pm to 7:00pm) within 20 seconds.

Minnesota Power stated, as it has in past SRSQ Reports, that all calls, regardless of topic, are routed through the Company's Interactive Voice Response (IVR) unit. Calls routed to outage reporting are handled immediately through an automated system, and one option customers may select is to speak directly with a representative at the Call Center. Although the Company can determine the number of calls by call category (e.g. service interruption), MP is unable to track response time by contact type. The Company expects that given the increasing number of contact options for customers under the "My Account" online self-service tool, the types of calls that the Call Center receives will likely become more complex and time consuming.

Based on its review of Minnesota Power's 2020 call center service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1700.

5. *Emergency Medical Account Status*

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of requests granted, and the number denied, including the reasons for each denial.

MP reported that 76 customers in 2020 requested emergency medical account status; 74 of these requests were granted after customers provided the correct information. Of the two who were denied, one filed an incomplete letter and one's letter was never received. MP reported that in total, there were 160 customers noted in the system with medical account status designation; 47 were removed due to non-renewal, deceased customer, customer request, or closed account.

Based on its review of Minnesota Power's 2020 emergency medical account status service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1800.

6. Customer Deposits

Minnesota Power that it refunded all deposits "in 2014." The Department notes that this 2014 figure has been used in each of MP's SRSQ Reports since 2014.

Based on its review of Minnesota Power's 2020 emergency medical account status service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.1900.

7. Customer Complaints

The reporting on customer complaints must include the following information by customer class and calendar month:

A. the number of complaints received;
B. the number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of customer complaints;
C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
D. the number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise; (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility; or (4) refusing to take the action the customer requested; and
E. the number of complaints forwarded to the utility by the Commission's consumer Affairs Office for further investigation and action.

MP received a total of 545 customer complaints during 2020, of which approximately 89% were from residential customers, and the remaining 11% were from commercial customers. The most frequent category of complaint was "high bill complaint," which amounted to 71.38% of all complaints. A total of 52% of the complaints were resolved on the same day, 36% were resolved in less than 10 days, with the remaining 12% taking more than 10 days to resolve. A total of 30 complaints were forwarded to the Company from the Commission's CAO.

Table 16. Minnesota Power's 2020 Customer Complaint Totals

	Residential	Commercial	Industrial	Total
2016	388	46	0	434
2017	641	56	0	697
2018	559	71	0	630
2019	478	47	0	525
2020	485	60	0	545

Based on its review of Minnesota Power's 2020 customer complaint service quality reporting requirements, the Department concludes that MP has met the reporting requirements of Minn. Rules pt. 7826.2000.

8. Commission's December 2020 Order, Order Point 14

Minnesota Power included a discussion addressing Order Point 14 of the Commission's December 2020 Order on pages 28-31 of its Report.

Minnesota Power provided monthly page views of its website, Facebook, MyAccount, as well as the number of installations of the mobile app. The Department summarizes these annual figures in the table below:

Table 17. Minnesota Power's 2020 Page Views and App Installations Totals

	Website	Facebook	MyAccount	Mobile App (installations)
Page Views/App Installations	1,314,540	35,111	339,242	6,568

Minnesota Power also provided a monthly summary of all emails received through the customerservice@mnpower.com email address, as well as a chart of the subject category of each email. The Department summarizes these annual figures in the table below:

Table 18. Minnesota Power's 2020 Annual Number of Emails Received and Approximate Number of Emails Received by Subject Category

Email Subject Category	Number of Emails Received (approx.)
Fuel Assistance	5,600
Billing Inquiry	1,600
Miscellaneous	1,300
Not specified	1,100
Start/Stop	1,050
Phone Transfer	600
ACCT Maintenance	500
Budget	400
Usage Request	300
Other	400
Total	12,722[9]

[9] Total does not equal approximate category numbers; MP's chart did not provide precise figures for each subject category but did provide a precise annual total count.

The Department concludes that Minnesota Power appears to have fulfilled the requirements of the Commission's December 2020 Order, Order Point 14, but also requests that in reply comments, the Company provide the additional information listed in Section II.A. above.

9. Commission's December 2020 Order, Order Point 16

Minnesota Power included a discussion addressing Order Point 14 of the Commission's December 2020 Order on pages 31-32 of its Report. In this discussion, the Company specified that it has participated as part of the quarterly SRSQ workgroup along with the Commission's CAO, the Department, Otter Tail Power, and Xcel Energy. The group has agreed to work together to refine definitions of customer complaint categories and consider emerging areas of interest. Quarterly meetings will continue with the objective of establishing a set of recommendations in the next SRSQ reporting cycle.

The Department concludes that Minnesota Power appears to have fulfilled the requirements of the Commission's December 2020 Order, Order Point 16.

E. RECONNECT PILOT PROGRAM

On December 9, 2020 in Docket No. E015/M-19-766, the Commission approved Minnesota Power's proposal to implement its three-year remote reconnect pilot program. As part of this Order, the Commission directed the Company to report on a number of metrics related to the program in MP's Annual SRSQ Report. However, as outlined in pages 33-34 of its filing, Minnesota Power has decided to delay implementation of the reconnect pilot program due to the COVID-19 pandemic. Minnesota Power noted that it has drastically reduced involuntary disconnections under the Minnesota Governor's Peacetime Emergency Order, thus obviating the immediate need for the reconnect pilot program. Minnesota Power intends to revisit implementation of the program at a later date, at which time it will begin reporting the required metrics in its Annual SRSQ filings.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department concludes that Minnesota Power has not submitted all information required by the Commission's January 28, 2020 Order in Docket No. E015/M-19-254. Order Point 2, Attachment B, Points 5, 7, 9, and 11 of that Order require the utilities to submit:

5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
7. The longest experienced interruption by any one customer (or feeder, if customer level is not available).
9. Estimated restoration time accuracy, using the following windows:
    i. Within -90 minutes to 0 of estimated restoration time
    ii. Within 0 to +30 minutes of estimated restoration time

11. Performance by customer class:

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized					
	Normalized					
Commercial	Non-normalized					
	Normalized					
Industrial	Non-normalized					
	Normalized					

If reporting by class is not yet possible, an explanation of when the utility will have this capability.

Minnesota Power should submit the required information from the Commission's Order in reply comments.

The Department also concludes that Minnesota Power has not submitted all the information required by Order Point 5 of the Commission's December 18, 2020 Order in Docket No. E015/M-20-404, which states that utilities should provide:

> 5. Reliability metrics (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.

To comply with the Commission's December 2020 Order, MP should report the pre-update historical averages for SAIDI, SAIFI, CAIDI, and MAIFI (both normalized and non-normalized) for each feeder associated with each of these projects. As the projects come into service, the Company should begin reporting post-update reliability metrics with each feeder. Finally, the Company should report feeder reliability metrics of any new grid modernization projects in future filings, or any overlooked by the Department in the current filing.

Further, the Department requests that in reply comments, Minnesota Power specify:

- How the IEEE 2.5 beta method used by the Company to normalize data meets the Commission's January 28, 2020 Order, Order Point 2 requirement to normalize data using the IEEE 1366 standard;
- The exact differences between the interruption events reported pursuant to Minn. Rules pt. 7826.0500, subp. 1, F, and those provided as an Minn. Rules pt. 7826.0500, subp. 1, G, pursuant to the Commission's variance of this Rule (listed in this filing in Table 16 of the SRSQ filing and Appendix A to the filing;

- Whether MP has a chat feature on its website, and whether that chat feature is:
    - live and staffed by internal utility employees;
    - live and staffed by third-party vendor employees;
    - a chat bot; or
    - something else and/or a combination of the above options; and
- Whether MP uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

The Department also requests that in the next two SRSQ reports, Minnesota Power provide the following information:

- The percentage uptime, to the second decimal, of the utility's:
    - general website
    - payment services
    - outage map and/or outage information page
- The error rate percentage, to the third decimal, of the utility's payment services.
    - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

Finally, the Department suggests that in future filings, MP:

- Specify whether work center reliability reporting metrics are normalized or non-normalized values; and
- Remove "account number" from Table 4 of Appendix A to the Company's SRSQ Report and replace it with another less identifying piece of data, such as date.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

Minnesota Department of Commerce
Comments

Docket No. E015/M-21-230

Dated this 16th day of August 2021

/s/Sharon Ferguson

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	Yes	OFF_SL_21-230_M-21-230
Hillary	Creurer	hcreurer@allete.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_21-230_M-21-230
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_21-230_M-21-230
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-230_M-21-230
Lori	Hoyum	lhoyum@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_21-230_M-21-230
Allen	Krug	allen.krug@xcelenergy.com	Xcel Energy	414 Nicollet Mall-7th fl Minneapolis, MN 55401	Electronic Service	No	OFF_SL_21-230_M-21-230
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	Yes	OFF_SL_21-230_M-21-230
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	Yes	OFF_SL_21-230_M-21-230
Susan	Romans	sromans@allete.com	Minnesota Power	30 West Superior Street Legal Dept Duulth, MN 55802	Electronic Service	No	OFF_SL_21-230_M-21-230
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-230_M-21-230

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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