

August 26, 2021

**VIA E-FILING**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101

**Re:** In the Matter of Minnesota Power Annual Safety, Reliability,  
and Service Quality Metrics for 2020  
**Docket No. E015/M-21-230**  
**Reply Comments**

Dear Mr. Seuffert:

Minnesota Power (or the “Company”) submits these Reply Comments in response to Initial Comments filed by the Department of Commerce, Division of Energy Resources (“Department”) on August 16, 2021, in the above-referenced Docket. On April 1, 2021, Minnesota Power submitted its Annual Safety, Reliability, and Service Quality Metrics Report for 2020 (“2020 SRSQ Report”) to the Minnesota Public Utilities Commission (“Commission”). The Department recommended to accept Minnesota Power’s 2020 SRSQ Report contingent upon the receipt of the additional information requested to be provided by the Company in its Reply Comments. In the following sections, the Company provides the requested information, and responds to recommendations made by the Department for future filings.

**Reliability Metrics**

In its Initial Comments, the Department concluded that Minnesota Power had not submitted all information required by the Commission’s January 28, 2020 Order in Docket No. E015/M-19-254. The Company provides the information required by Order Point 2, Attachment B, Order Points 5, 7, 9, and 11:

5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available). [The highest number of interruptions experienced was by one feeder, which is located at 15th Ave W 233 \(with a SAIFI of 6.72\).](#)

7. The longest experienced interruption by any one customer (or feeder, if customer level is not available). The longest experienced interruption was by one customer, with an outage lasting 2,402 minutes (1.67 days) during a major storm event on August 14, 2020.

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

Please see Attachment A for this requested information.

#### 11. Performance by Customer Class

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized	99.97115%	151.62	1.20	126.13	4.14
	Normalized	99.98030%	103.52	1.03	100.50	3.69
Commercial	Non-normalized	99.99480%	27.33	0.22	126.13	0.75
	Normalized	99.99645%	18.66	0.19	100.50	0.66
Industrial	Non-normalized	99.99991%	0.49	0.00	126.13	0.01
	Normalized	99.99994%	0.33	0.00	100.50	0.01

\*\*Due to the way the Company calculates these numbers as % of the feeder the CAIDIs will be the same as the overall CAIDI.

The Department also concluded that Minnesota Power had not submitted all of the information required by Order Point 5 of the Commission's December 1, 2020 Order in Docket No. E015/M-20-404. Order Point 5 requires the Company to provide 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. For this information, please see Attachment B.

Additionally, the Department requested that the Company specify the following in Reply Comments:

- 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. Minnesota Power uses the IEEE 2.5 Beta Method to calculate the Major Event Excluded number. Any event that surpasses

the number calculated by the IEEE 2.5 Beta Method is therefore excluded. Minnesota Power, due to its geographical makeup, is unique in that it uses an event start and stop time, not a 24 hour rolling timeline or a 12am-12am timeline.

- 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; The items listed on pages 11-19 are the outages that exceed 50,000 SAIDI comp or Customer Minutes Interrupted for the year. No other criteria exist for an outage to make this list. Appendix B reports the outages pertaining to the feeder level of 500+ customers for 60 minutes or more. There are more outages that reach 50,000 SAIDI Comp designation than meet the other reporting criteria. This is due to the requirement that at least 500 must be out for at least 60 minutes as a result of a feeder breaker being open.

### Customer Service Data

In its Initial Comments, the Department asks several questions specific to the functionality of Minnesota Power's website. The responses to these questions are as follows:

- Does Minnesota Power have a chat feature on its website? [Minnesota Power does not have a chat feature on its website.](#)
- Does Minnesota Power use internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures? [Minnesota Power has the ability to use Google Analytics for metric analysis. Additionally, the Company uses a service called Pingdom,<sup>1</sup> which sends an alert whenever the website is offline.](#)

### Future Filing Recommendations

In its Initial Comments, the Department 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

---

<sup>1</sup> <https://www.pingdom.com/>.

- 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 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.

Minnesota Power has no issues with the Department's recommendation regarding work center reliability metrics for future filings. The Company is open to exploring additional reporting requirements regarding website uptime and payment services; however, the Company suggests that they begin with the next calendar year, as opposed to retroactively, as the calendar year 2021 is nearly three quarters complete. This will help to ensure time to get new reporting processes in place both internally and with external vendors, as applicable. For example, the Company uses a third party vendor for payment services and would need to work with its payment vendor to confirm uptime and error rate metrics would be available through them in the manner proposed by the Department. Similarly, the Company uses an external vendor for the MyAccount tool and would need to work with them to effectuate these reporting requirements. For Table 4, the Company thanks the Department for this important observation. This information was included in error. Minnesota Power will submit an errata filing and resubmit Appendix A with Table 4 updated using a date in place of the customer number.

Minnesota Power appreciates the opportunity to provide the information identified by the Department, and will ensure all order point requirements will be addressed in future SRSQ Reports. Please contact me at (218) 355-3601 or [lhoyum@mnpower.com](mailto:lhoyum@mnpower.com) if you have any questions regarding this filing.

Yours truly,



Lori Hoyum  
Regulatory Compliance Administrator

LMH:th  
Attach.

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 26<sup>th</sup> day of August, 2021, she served Minnesota Power's Reply Comments in **Docket No. E015/M-21-230** 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