March 30, 2020

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

Ms. Jessica Burdette
Energy Regulation & Planning Manager
Minnesota Department of Commerce
85 7th Place East, Suite 280
St. Paul, MN 55101

RE: RESPONSIVE MEASURES TO COVID-19
Minnesota Power Additional Steps to Care for Customers
Docket No. E,G999/CI-20-375

Dear Mr. Seuffert and Ms. Burdette:

On March 25, 2020, Chair Katie Sieben and Commissioner Steve Kelley sent all Minnesota utilities a letter in the above-referenced Docket. Below is our response and we welcome any additional questions the Minnesota Public Utilities Commission (“Commission”) and the Minnesota Department of Commerce (“Department”) have in this critical time.

We understand that the fast-moving COVID-19 outbreak is causing growing uncertainty and concern throughout our region and our nation. Protecting the health and safety of our employees, our families, our customers and our communities is of the utmost priority to us. We are grateful to you for your recognition of these unprecedented times and thank you for what we know is a shared commitment to Minnesotans, particularly those facing economic hardship, to ensure uninterrupted delivery of the essential energy services they are counting on more than ever. On March 16, 2020, we shared with you some proactive measures we were voluntarily taking to provide protections and enhance safety during this peacetime emergency, including:

- 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, with further review and consideration anticipated at that time.
- Encouraging customers to contact us regarding payment plans and options that reflect their unique financial resources and circumstances.
- For the safety of our workers and our customers, suspension of all non-emergency customer site visits for the time being.
- Following appropriate CDC guidelines when entering homes or businesses for emergency-related services only.
In addition to these measures, and in light of your March 25, 2020 letter, Minnesota Power is in the process of implementing procedures to support the following additional actions, which will take effect this week:

- Waive late payment charges for residential and small business (general service) customers who are affected by the coronavirus pandemic.
- Suspend disconnections for small business (general service) customers facing financial hardship in relation to the coronavirus pandemic.
- Waive reconnection fees during normal business hours for residential and small business (general service) customers previously disconnected for non-payment. These reconnections will continue to be prioritized to ensure prompt action for those seeking to reinstate service.

These additional actions are a deviation from our filed service regulations, and to some degree Minnesota Rules, with respect to late payment charges and reconnection fees, but we believe unprecedented times call for unprecedented measures, as recognized in your request and, as such, we fully commit to all of the actions identified in the Commission’s and Department’s letter. Minnesota Power may seek additional clarification from the Commission as needed.

Importantly, we are also working hard to raise awareness and help to connect residential and small business customers with various resources available to help them. We are also stepping up our efforts to caution against scammers looking to use the COVID-19 situation to steal money and personal information. Minnesota Power is leveraging multiple channels to ensure we are meeting customers where they are and when they need us. This includes our Call Center and program representatives who stand ready to answer calls and walk customers through options, our web site (www.mnpower.com) which is updated frequently with the latest information, the MyAccount customer portal, outbound calling, social media, and collaboration with community and regional partners.

We greatly appreciate the Commission’s and the Department’s recognition that additional regulatory flexibility may be needed, even beyond what we’ve described above related to service regulations, to enable utilities to act quickly in the best interest of our customers. In addition, like our customers, we are incurring incremental costs as a result of this peacetime emergency. We will likely see a significant increase in arrearages and uncollectible balances as we rightfully strive to focus on maintaining essential services for our customers. Amidst these efforts, we will also need to ensure a financially healthy utility to continue to provide these essential services. We know the focus of your request is providing assurances for customers, and we agree that is the proper immediate focus – and one we share. We look forward to continued work with you during these unprecedented times to address the needs of utilities and the Minnesotans we serve.

Now more than ever, we are committed to delivering safe and reliable power. While this letter focuses on our actions most directly related to the topics posed in your letter, we want you to know that our talented employees will continue to provide the essential services that have powered our region for more than 100 years. There are many other actions we are taking under our business continuity and pandemic plans involving protection of employees and customers, continuity of operations, and cyber
security, and we will be happy to provide periodic updates as the COVID-19 situation continues to evolve. Thank you for your trust in Minnesota Power as we work together to keep our communities, our customers, and our families healthy and safe. We appreciate the opportunity to respond to your letter.

Please contact David Moeller at dmoeller@allete.com or (218) 723-3963 or Jennifer Peterson at jjpeterson@mnpower.com or (218) 355-3202 or me if there are any questions regarding this submission.

Sincerely,

Bethany M. Owen
ALLETE
President and CEO

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Tiana Heger of the City of Duluth, County of St. Louis, State of Minnesota, says that on the 30th day of March, 2020, she served Minnesota Power’s Response Letter in Docket No. E,G999/CI-20-375 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