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July 13, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: In the Matter of Otter Tail Power Company's 2018 Conservation Cost Recovery
Adjustment and 2017 Electric Demand Side Management Financial Incentive
Docket No. E017/M-18-119
REPLY COMMENTS**

Dear Mr. Wolf:

The Minnesota Department of Commerce Staff (Department) filed response comments on July 3, 2018, recommending approval of Otter Tail Power Company's (Otter Tail's) 2017 year-end CIP tracker balance, financial incentive with adjustments, updated CIP surcharge, and a variance to two Minnesota Rules.

Otter Tail provides the following Reply Comments to the Department, responding to the Department's recommended adjustments to Otter Tail's requested financial incentive amount.

Please feel free to contact me at 218-739-8639 or jgrenier@otpco.com with any questions.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Market Planning

ljh
Enclosures
By electronic filing
C: Service List

**OTTER TAIL POWER COMPANY REPLY COMMENTS
TO THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**REGARDING OTTER TAIL POWER COMPANY'S 2017
DEMAND SIDE MANAGEMENT FINANCIAL INCENTIVE PROJECT
AND ANNUAL FILING TO UPDATE THE CONSERVATION
IMPROVEMENT PROGRAM (CIP) RIDER.**

**DOCKET NO. E017/M-18-119
July 13, 2018**

I. Background

Otter Tail Power Company (Otter Tail or the Company) respectfully responds to the Minnesota Department of Commerce, Division of Energy Resources (Department or Staff) Response Comments in Otter Tail's 2017 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Program (CIP) Rider.

On June 7, 2018, the Otter Tail filed reply comments in response of the Department's May 30, 2018 recommendation in this docket. Otter Tail and the Department agreed on all items included in Otter Tail's original March 30 petition except the level of the Company's 2017 CIP performance incentive. The Department calculates the Company's 2017 CIP performance incentive at \$2,642,360, while the Company proposed a \$2,952,553 CIP performance incentive – based on merit – in its June 13 reply comments.

The Department's July 3, 2018 response comments show Otter Tail and the Department are still in agreement on all items requested in the Company's original petition except for the amount of the Company's requested 2017 CIP performance incentive.

The following comments from the Company discuss the merits of its requested 2017 CIP performance incentive and points discussed by the Department in their response comments.

II. DISCUSSION OF FINANCIAL PERFORMANCE INCENTIVE

A. The Company intended to spend the entire 2017 budget approved by the Department but was unable to due to a longer than expected administrative process.

Otter Tail agrees with the Department's perspective regarding the Company's Street and Area Lighting (LED Street Lighting) rate schedule and implementation plan, Docket No. E017/M-17-152. As the Department stated in their July 3, 2018 response comments, the LED Street Lighting filing was complex and warranted extensive review and additional information gathering. Otter

Tail is very appreciative of the extensive review Department staff performed on the LED Street Lighting filing. Otter Tail's proposal was unique to traditional regulatory filings since it crossed over into rate making and CIP. Fortunately, the Company and Department were able to work together to establish a fair mechanism for cost recovery of the LED Street Lighting project. However, the recovery mechanisms approved in the LED Street Lighting docket is a separate issue independent of the Company's CIP performance incentive. Ultimately the collaboration of work done between the Department, Otter Tail, and the Minnesota Public Utilities Commission (MPUC) has led to accelerated installation of energy-efficient LEDs, increased energy savings, and significant net benefits delivered to Otter Tail's customers.

As the Department discussed, Otter Tail did request in its September 28, 2017 comments in the LED Street Lighting filing the start date of the LED Street Lighting project to begin in 2018. At the time of the request, nearly into the fourth quarter of 2017, the Company knew the earliest MPUC approval would likely occur in mid- to late-fourth quarter of 2017. Knowing a December implementation of the project would be very challenging; the Company made the request to the MPUC to begin implementation in 2018.

The Company is not claiming any entity in the regulatory process is at fault for the lengthy LED Street Lighting tariff approval; instead the Company is simply stating the regulatory process was longer than expected at nearly 10 months. Otter Tail's intention was to implement and spend the LED Street Lighting project's budget in 2017. Otter Tail is only requesting its record setting performance results not be harmed by unique circumstances and timing of the regulatory process. The Company believes the main issue in this docket deals with timing, which can easily be resolved by Otter Tail's proposal described later in these comments.

B. The Company's financial incentive was significantly impacted.

The Department agreed with Otter Tail in their July 3, 2018 response comments that the Company's performance incentive would have been higher if the Company spent more money in 2017. The Department stated, "the LED program is expected to incur cost for five years, the associated incentive will simply be shifted to the year(s) in which the costs are incurred."

The Company believes the issue of disagreement is simply a timing issue, not an issue of performance. Otter Tail proposes a straight-forward solution to allow the initial budgeted cost for 2017 to be included towards the 2017 financial incentive spend and not allow any 2022 LED Street Lighting project costs to be included towards the 2022 financial incentive. This solution reduces the overall LED Street Lighting project expenses eligible to be counted towards the financial incentive. This is a very simple way to accommodate the unique circumstances facing the performance incentive issue being discussed here.

Table 1 shows the MPUC approved annual and 5-year total approved budgets. Table 1¹ also shows Otter Tail’s proposal to fix the timing issue created in year one and include no costs in 2022 to ensure no additional expenditures are recognized towards the financial incentive. This strategy is very simple to administer, clears up the year one timing issue, and allows Otter Tail’s 2017 achievements to be fully recognized. This solution only impacts the financial incentive and does not book any additional expenses to the CIP tracker account. Only actual expenses from the program years of 2018-2021 will be eligible towards the CIP financial incentive for those years.

Table 1

	Year 1	Year 2	Year 3	Year 4	Year 5	
	2018 Budget for LED Project	2019 Budget for LED Project	2020 Budget for LED Project	2021 Budget for LED Project	2022 Budget for LED Project	Total LED Project Expenses
Total Recovery through CIP Tracker	\$775,483	\$810,905	\$846,327	\$881,749	\$917,170	\$4,231,633
Proposed Eligible Budget/Spending for Financial Incentive	\$775,483	\$810,905	\$846,327	\$881,749	\$0	\$4,089,945
Change in Total Expenses Eligible towards Financial Incentive	\$775,483	\$0	\$0	\$0	-\$917,170	-\$141,688

C. The Company achieved a record percentage of savings in 2017 and should be adequately compensated for these achievements.

As Otter Tail stated in its June 13, 2018 reply comments, the Company’s CIP energy savings in 2017 achieved 3.02 percent of Company sales – a record for Otter Tail – and by the Company’s analysis in Table 1, the highest percent savings level ever achieved by an electric utility in Minnesota.

¹ Table 1 does not include the adjustment to remove the Return on Incremental Costs of New Lights as discussed later in these comments. Table 1 is simply to demonstrate Otter Tail will not include any 2022 expenses toward the performance incentive.

Table 2	Otter Tail	Xcel Energy	Minnesota Power
	Energy Savings (%)	Energy Savings (%)	Energy Savings (%)
2017	3.02%	2.27%	2.60%
2016	2.75%	1.91%	2.10%
2015	2.33%	1.73%	2.84%
2014	1.62%	1.66%	2.50%
2013	1.67%	1.71%	2.50%

As the Department points out in its July 3, 2018 response comments, the Company did indeed achieve more savings in 2016 than 2017. However, in 2016 the Company did not have any CIP exempt customers, while the other Minnesota investor owned electric utilities did. One of Otter Tail customers that became CIP-exempt in 2017 had several large projects in 2016 driving Otter Tail’s high energy savings. Comparing Otter Tail’s results to the other utilities prior to 2017 was an apple and oranges comparison since Otter Tail was the only utility with no CIP-exempt customers. The best way to compare achievements is based on the savings percentage achieved. On a percentage basis, with all utilities having CIP-exempt customers, Otter Tail’s 2017 results of 3.02 percent were the highest energy savings achievement on record.

D. The Company believes the commission has authority to grant its request to use budgeted projects costs for calculating the Company’s performance incentive.

As Otter Tail stated in its June 13, 2018 comments, its proposal to include budgeted 2017 LED Street Lighting project expense towards the 2017 financial incentive calculation does not conflict with the four objectives within Minnesota Statute § 216B.16 Subd 6c. However, Otter Tail believes these four objectives apply to the development of the performance incentive mechanism and not necessarily to how it is applied going forward. Otter Tail is not seeking to change the performance incentive mechanism that was approved by the MPUC but is asking for an adjustment to the expenses applied to the performance incentive cap to include the expenses the Company planned to incur in 2017 had the regulatory process not been extended. The Company believes its request does not conflict with Minnesota statute and the MPUC has the full authority to decide to include 2017 budgeted expenses towards Otter Tail’s performance incentive.

The Company requests the MPUC to consider future innovative projects brought by utilities and how regulatory risks may impact development of those innovative projects. Allowing budgeted expenses to be included in this instance does not create a precedence but demonstrates to utilities the MPUC supports the development of non-traditional projects and does not want to discourage on utilities requesting these cost-effective and customer focused projects.

As CIP goals become increasingly challenging to achieve, utilities will need to become more creative with cost-effective program offerings. Otter Tail understood by filing the LED Street Lighting project with the MPUC it would be a lengthy process but believed the Company would still be able to implement the project in 2017. If the MPUC allows Otter Tail to recognize the approved 2017 budget as 2017 expenditures for the performance incentive, the MPUC is signaling to utilities to find innovative approaches to CIP program development and delivery which provide customer net benefits. Otter Tail believes it should not be penalized for trying an innovative approach which ultimately drives significant net benefits for rate payers. Otter Tail is already seeing cost-effective results for the LED Street Lighting project in 2018.

III. RESPONSE TO THE DEPARTMENT'S ADDITIONAL OBSERVATION REGARDING THE COMPANY'S PROPOSAL

The Department's analysis of the MPUC's approved LED Street Lighting project budget raises a good observation as to the appropriate level of budget or expenses which should be eligible to include towards the performance incentive calculation. The Department's correctly states a public utility can receive rebates for CIP projects. The Department further states that rebates paid to the public utility should not count towards the performance incentive spending cap. Otter Tail disagrees with the Department on this point.

CIP rebates paid to the public utility reduces capital investment upfront thereby reducing the public utility's potential rate base. The public utility accepts the rebate and forgoes the rate base investment, receiving no return on the investment/rate base going forward. Paying a rebate to the utility does not create a financial benefit to the Company. The only benefit to the Company by receiving a rebate is it provides energy efficiency projects a competitive advantage when included in the utility's very long and competitive capital budgeting process. Otter Tail believes including rebate expenses paid to the Company should be included within the Company's performance incentive calculation since the rebate does not financially benefit the Company and the rebate generally is used for customer use street lighting which also provides significant net benefits to customers. Not allowing CIP rebate expenses for the Company to count towards the financial incentive will cause the Company to re-evaluate the implementation of the LED Street Lighting project. Reallocating those budgeted dollars to a separate CIP program where they are eligible towards the CIP performance incentive calculation might be more advantageous for the Company. The rebate dollars for the Company were critical in getting the project elevated over other internal capital projects.

The Department also states, the Return on Incremental Cost of new Lights (rate of return) approved by the MPUC for the LED Street Lighting project should not be included as an expense eligible towards the Company's financial incentive. Otter Tail fully agrees with the Department on this point. Including the rate of return allowed is much different than including Company rebates as discussed above. The approval by the MPUC to allow a rate of return on the

incremental cost of new lights is a benefit to the Company and any kind of return on this rate of return in the form of a CIP financial incentive would be similar to double recovery, which the Company does not support. The Company agrees with the Department to not include any rate of return dollars on the new light within eligible expenses for the Company's requested performance incentive.

Table 3 below summarizes Otter Tail's request, accepting the Department's position to not include the Return on Incremental Costs of New Lights.

Table 3

Proposed LED Streetlight Expenses Eligible for Performance Incentive	Year 1	Year 2	Year 3	Year 4	Year 5	5-Year Total
CIP Program Evaluation	\$3,000	\$3,000	\$3,000	\$3,000	\$3,000	\$15,000
CIP Rebate	\$178,572	\$178,572	\$178,572	\$178,572	\$178,572	\$892,860
Administrative Costs	\$125,000	\$125,000	\$125,000	\$125,000	\$125,000	\$625,000
Retirement and Disposal Costs	\$432,803	\$432,803	\$432,803	\$432,803	\$432,803	\$2,164,015
Total Recovery through CIP Tracker	\$739,375	\$739,375	\$739,375	\$739,375	\$739,375	\$3,696,875

IV. SUMMARY

Otter Tail's 2017 CIP achievements are record setting and should not be limited by the unique circumstances created by the administrative process. Otter Tail requests the MPUC to allow the Company to include the budget of \$739,375 for the LED Street Lighting project towards the Company's spending in 2017 for calculations of the performance incentive. The Company made a good faith effort to offer an innovative customer focused program in 2017 with the belief the Company's financial incentive would not be negatively impacted as a result.

Including the \$739,375 for the LED Street Lighting project on top of the Company's \$6,605,899 spending for 2017 equals a total of \$7,345,274. Forty percent cap on this amount equals a performance incentive of \$2,938,110 which is lower than the \$3.1 million actual performance but higher than the Department's \$2.6 million recommendation with the 40 percent spending cap.

Otter Tail believes its request is a reasonable approach to reward the Company for record setting energy savings and encourages the Company to continue to try innovative approaches in CIP. This approach still applies the 40 percent spending cap, encourages the utility to pursue non-financial incentive customer focused energy saving programs in the future, and remedies the unique circumstances created by the administrative process.

The Company's 2017 CIP results provided \$23.6 million in customer net benefits. Otter Tail's requested performance incentive of \$2,938,110 is only 12.4 percent of total net benefits. This is less than the maximum payout of 13.5 percent of net benefits due to Otter Tail's effective management of CIP program expenses and due to the LED Street Lighting filing not being implemented. The performance incentive plan encourages Otter Tail to maximize cost-effective conservation above all other resources.

Table 4 below provides a summary of Otter Tail’s proposal.

Table 4	2017 CIP Actual Results	2017 CIP Results Including LED Lighting Budget*
Energy Savings (kWh)	52,497,167	52,497,167
Net Benefits	\$23,626,518	\$23,626,518
Program Spending	\$6,605,899	\$7,345,274
Savings as % of Historic Sales	3.02%	3.02%
Net Benefits Cap for Financial Incentive	13.5%	13.5%
Financial Incentive from Net Benefits	\$3,189,580	\$3,189,580
Financial Incentive after 40% Spending Cap	\$2,642,360	\$2,938,110

*reduced by \$36,108 to exclude return on incremental cost of new lights

Otter Tail believes its request does not conflict with Minnesota statute and the believes the MPUC has the authority to recognize the unique situation surrounding the Company’s 2017 CIP and allow the inclusion of the LED Street Lighting project’s year one budget within the Company’s 2017 CIP spending. The Company does not believe that its request conflicts with any CIP statutory provisions.

Otter Tail believes any CIP rebates paid to the Company should be allowed as expenses counted towards the financial incentive calculation spending. These rebates reduce rate base investment and provide no return to the Company. Allowing them to be eligible expense for the performance incentive calculation is not a form of double recovery. Otter Tail agrees with the Department’s position to remove the rate of return from eligible expenses for calculating the financial incentive and will not include the rate of return in this calculation moving forward.

Otter Tail requests the following items to the MPUC for approval:

1. approve Otter Tail’s 2017 CIP tracker account resulting in a December 31, 2017 tracker balance of \$7,362,345;
2. allow the inclusion of the LED Street Lighting project’s \$739,375 budget to be included in 2017 CIP spending for the calculation of the financial performance incentive, resulting in an approval of a financial performance incentive of \$2,938,110 for Otter Tail’s 2017 CIP achievements;
3. approve a CCRA of \$0.00600 per kWh, to be effective October 1, 2018;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission’s Order in the present docket; and

5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Otter Tail understands MPUC approval of these points requires Otter Tail to not include any LED Street Lighting project expense towards the Company's 2022 financial incentive.

Otter Tail is available to answer any questions the Department or MPUC may have.

Dated: July 13, 2018

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON A. GRENIER

Jason A. Grenier

Manager, Market Planning

Otter Tail Power Company

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CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's 2018 Conservation Cost Recovery Adjustment and 2017 Electric Demand Side Management Financial Incentive Docket No. E017/M-18-119

I, Lindsay Hauer, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **13th** day of **July, 2018**

/s/ LINDSAY HAUER

Lindsay Hauer
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