

April 19, 2024

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources
Otter Tail Power Company 2023 Integrated Distribution Plan**
Docket No. E017/M-23-380

Dear Mr. Seuffert:

Attached are the reply comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan

Otter Tail Power Company's Integrated Distribution Plan (IDP) was filed on November 1, 2023, by Michael Riewer, Manager, System Infrastructure and Reliability for Otter Tail Power Company.

The Department recommends Commission approve OTP's IDP, subject to certain modifications. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Affairs

SL/ad
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-23-380

I. INTRODUCTION

The Department appreciates the opportunity to further comment on OTP's IDP and the notice topics put forth by the Commission. The Department provides its comments in response to select topics addressed by OTP in its reply comments and also addresses topics for which the Department did not make a recommendation in initial comments.

II. PROCEDURAL HISTORY

On November 15, 2023, the Commission issued its Notice of Comment Period on the issues of whether the Commission should accept or reject Otter Tail Power Company's (OTP, or the Company) 2023 Integrated Distribution Plan (IDP) and Transportation Electrification Plan (TEP).¹ The Notice included the following topics open for comment:

2023 Otter Tail Power Integrated Distribution System Plan

1. Should the Commission accept or reject Otter Tail Power's IDP?
2. Did Otter Tail Power adequately address the Commission's IDP filing requirements and prior Orders, as outlined in Attachment A to this notice? Is additional information necessary for improved clarity?
3. Feedback, comments, and recommendations on the following areas of Otter Tail Power's IDP:
 - a. Non-wires alternatives analysis and potential pilot project
 - b. Planned grid modernization initiatives
 - c. Forecasted distribution budget
 - d. Distributed Energy Resource (DER) scenarios and forecasts
 - e. The System Infrastructure and Reliability Improvement (SIRI) initiative
 - f. Results from the DER and Electric Vehicle (EV) impact study conducted in Morris, MN
4. In light of Otter Tail Power's pilot project on a utility-scale electrical battery system, is Otter Tail Power conducting its non-wires analyses in a reasonable way?
5. Has Otter Tail Power appropriately discussed its plans to maximize the benefits of the Inflation Reduction Act (IRA) and the IRA's impact on the utility's planning assumptions pursuant to Order Point 1 of the Commission's September 12, 2023 Order in Docket No. E,G-999/CI-22-624?
6. What should the Commission consider or address related to enhancing the resilience of the distribution system within Otter Tail's IDP?

¹ 2023 Integrated Distribution System Plan, Otter Tail Power Company, Docket No. E017/M-23-380 (November 1, 2023) (eDocket No. [202311-200138-02](#)). Hereinafter "IDP."; Notice of Comment Period – In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Docket No. E017/M-23-380 (November 15, 2023). (eDocket No. [202311-200509-01](#)). Hereinafter "Notice."

7. Other areas of Otter Tail Power's IDP not listed above, along with any other issues or concerns related to this matter.

2023 Otter Tail Power Transportation Electrification Plan (TEP)

8. Should the Commission approve, modify, or reject Otter Tail Power's TEP?
9. Did Otter Tail Power adequately address the Commission's TEP filing requirements and prior Orders, as outlined in Attachment A to this notice? Is additional information necessary for improved clarity?
10. How should the Commission consider modifications or supplements to Otter Tail Power's Transportation Electrification Plan?
11. Should the Commission establish any procedural or filing requirements for future TEPs under Minn. Stat. 216B.1615?
12. Are there gaps in Otter Tail Power's transportation electrification programs the Commission should address to ensure equitable customer outcomes?
13. Are there other issues or concerns related to this matter?

The Commission issued a Notice of Extended Comment Period on January 19, 2024.² Comments were submitted by the Minnesota Department of Commerce (Commerce or Department) on March 22, 2024.³ OTP submitted reply comments on April 5, 2024.⁴ The Department submits these reply comments in response to OTP reply comments.

III. DEPARTMENT ANALYSIS

OVERVIEW OF COMMENTS

In these reply comments, the Department focuses on specific issues raised through the Notice of Comment Period, and the filed comments in this proceeding. The Department does not devote equal attention to all topics but rather prioritizes discussion of certain matters—namely, the purpose of the IDP and need for the provision for enhanced transparency and informational quality, and issues concerning beneficial electrification and load forecasting.

The order of these reply comments is as follows:

- A. *Recommendation concerning acceptance of the IDP*
- B. *Recommendation concerning the TEP*
- C. *Requests for additional information from OTP*

² Notice of Extended Comment Period – In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Docket No. E017/M-23-380 (January 19, 2024). (eDocket No. [20241-202359-01](#)).

³ Initial comments, Minnesota Department of Commerce, In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Docket No. E017/M-23-380 (March 22, 2024). (eDocket No. [20243-204579-01](#)). Hereinafter "Department initial comments."

⁴ Reply comments, Otter Tail Power Company, In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan, Docket No. E017/M-23-380 (April 5, 2024). (eDocket No. [20244-205048-01](#)). Hereinafter "OTP reply comments."

- D. *The purpose of the IDP*
- E. *Recommendations for enhanced informational requirements*
- F. *Beneficial electrification and related issues*

A. RECOMMENDATION CONCERNING ACCEPTANCE OF THE IDP

After careful review, the Department concludes that the Company sufficiently addressed each of the IDP Filing Requirements and Commission Orders.

The Department recommends that the Commission accept Otter Tail Power’s 2023 IDP, subject to certain modifications.

These recommended modifications are detailed in these comments.

B. RECOMMENDATION CONCERNING THE TEP

In initial comments, the Department evaluated the Company’s TEP using the criteria established in Minn. Stat. § 216B.1615, Subd. 3, and found the TEP to be reasonable and in the public interest. The Department maintains its conclusion from initial comments that the Company’s TEP is reasonable and in the public interest and sufficiently addressed the TEP Filing Requirements.

C. REQUESTS FOR ADDITIONAL INFORMATION FROM OTP

In its initial comments, the Department requested additional information and also made recommendations for future modifications. OTP’s responses to these requests and recommendations are summarized in the two tables below.

Table 1. Requests for Additional Information to be Provided in Reply Comments

Topic	Request for Discussion/Data Relating to:	Reply from OTP
DRMS Vendor	“... how OTP selected its DRMS vendor, if applicable, including whether costs and benefits were weighed prior to vendor selection, and that OTP present its cost-benefit analysis for the DRMS project, if available.”	OTP describes its process for selecting Demand Response Management System (DRMS) vendors: private meetings with top vendors, investigation into other utilities' experiences with vendors, further evaluation, selection. OTP does not provide a CBA or discuss having yet conducted one.
DER Forecasting	“... how [OTP] can expand its DER forecasting in its 2025 IDP to inform system-wide distribution planning.”	OTPs states that it is gathering “more accurate and applicable data” and that this date in conjunction with increased visibility from AMI will enable improvements to forecasting. OTP also alludes to the impacts of state and federal policies on future DER trends.

Topic	Request for Discussion/Data Relating to:	Reply from OTP
IRA Impacts	"... how [OTP's] distribution system planning will evolve with the incorporation of additional impacts from the IRA."	OTP reports that it has attended meetings with DOC staff and other stakeholders to prepare for new IRA programs and how they will pair with Company's ECO program. OTP expresses interest in the home energy auditor program. OTP says that with AMI, "the Company will be able to measure and evaluate load change impacts from the implementation of IRA and ECO programs on the distribution system."
Customer Heating Sources	"... the fraction of [OTP's] customers that rely on the primary heating sources of natural gas, electric resistance heat, or all other heat sources."	OTP provides the requested data of the primary heating sources of its customers based on a survey it conducted in 2018 and indicates that it intends to conduct additional studies in 2024.
IDP-Specific Budget Categories	"... potential revision of IDP filing requirements to remove the requirement that financial information be presented in IDP-specific budget categories."	OTP provides a list of the categories it provided financial data in its first IDP and identified in bold the categories that most closely align with its existing capital budget forecasting. ⁵ The Company notes that some of its capital budget categories align directly with the IDP-specific budget categories while those that do not require manual manipulation to fit the IDP categories. The Company states that this categorization effort is manageable. OTP proposes the potential to combine the IDP-specific categories of "System Expansion or Upgrades for Capacity" and "System Expansion or Upgrades for Reliability and Power Quality" due to the overlap of the categories.
IDP Scheduling	"... how to schedule the IDP filing to better integrate the IDP's inputs and outputs with other Commission proceedings in reply comments."	OTP Indicates a limited set of proceedings that are relevant to the IDP but supports leaving the filing timing of the IDP as is.

⁵ OTP reply comments at page 6.

Topic	Request for Discussion/Data Relating to:	Reply from OTP
NWA Analysis	"... [OTP's] process for how NWA analysis will be conducted, and present an analysis, as applicable, for the "Purchase of DSA Substation" and "Rush Otter South Feeder Upgrades" projects."	OTP provides a response to the Department regarding two projects identified for potential Non-Wires Alternative (NWA) Analysis: Purchase of DSA Substation and Rush Otter South Feeder Upgrades. Regarding the Purchase of DSA Substation project, the Company states that it is a project located in North Dakota and was mistakenly included in the IDP. Regarding the Rush Otter South Feeder Upgrades project, the Company states that the project is not appropriate for further NWA Analysis. OTP indicates that the project is an overhead line to underground conversion project which was identified due to the age and condition of the assets and that NWA is applicable for capacity driven projects.

After careful review, the Department concludes that the Company has generally responded sufficiently in its reply comments to the Department's requests for additional information. The Department notes two specific exceptions where additional information is required: concerning DRMS, where the Company should provide a cost-benefit analysis; concerning NWAs, where the Company should describe its process for conducting NWA analysis. Each of these cases is discussed separately in a subsequent section of these comments.

Table 2. Requests for Additional Information to be Provided at a Later Date

Topic	Request for Commission to Direct OTP to:	Reply from OTP
Morris Flow Battery Project	Provide in 2025 IDP an update on the Morris Flow Battery Project	OTP indicates that it will provide an update of the University of Minnesota – Morris Flow Battery Project in its 2025 IDP.
Morris, Minnesota Impact Study	Include in its 2025 IDP an update on the Morris, Minnesota impact study and identify the specific investments included in its budget to mitigate risks identified in the study.	OTP intends to provide an update of the Morris, Minnesota Impact Study in its 2025 IDP. OTP notes its investments in AMI and GIS systems will enable it to “perform in-depth studies on both current and future EV and DER load impact(s) to the Otter Tail electrical distribution system infrastructure.” ⁶
Beneficial Electrification	File a supplemental filing that proposes a plan to accelerate beneficial electrification for its customers and provide forecasts of expected grid impacts of the same.	OTP discusses its existing and planned efforts to accelerate beneficial electrification. However, the Company states that it would be premature to file a supplemental filing with a plan to accelerate beneficial electrification outside of its ongoing efforts in its Energy Conservation and Optimization (ECO) Triennial Plan. ⁷

The Department is satisfied with the Company’s response to its request for additional information in the 2025 IDP on the Morris Flow Battery Project and the Morris, Minnesota Impact Study. However, the Department does not find the Company’s reply to its request for a supplemental filing on beneficial electrification to be adequate. This is addressed in greater detail in Section F.

D. THE PURPOSE OF THE IDP

A key question attending the review of the Minnesota utilities’ 2023 IDPs concerns the purpose of these biennial filings. The Department stresses that a clearer understanding of the Commission’s view on this matter is needed to establish objective standards of review for the IDP and to resolve potential disagreements relating to the extent of information that OTP should reasonably be expected to provide in its IDP filings. Moreover, certain topics in the Notice of Comment Period for this proceeding invite clarification on the role of the IDP. For example, Topic 2 asks whether “additional information [is] necessary for improved clarity.”

The Department has reviewed OTP’s IDP based on its view of the objectives of the IDP, which is informed by the language of the Commission’s IDP filing requirements. In the Department’s view, the

⁶ OTP reply comments at page 9.

⁷ *Compliance Filing, In the Matter of Otter Tail Power Company’s 2024-2026 Energy Conservation and Optimization Triennial Program, Otter Tail Power Company, Docket No. E017/M-23-94* (January 30, 2024). (eDocket No. [20241-202894-01](#)). Hereinafter “2024-2026 Triennial Plan”.

intended function of the IDP is as a document informational in nature, but with enough substance to be able to *inform* decisions made in other proceedings, including cost recovery proceedings. Thus, the Department's recommendations are geared toward improving the quality of information included in OTP's IDP.

In light of the foregoing discussion, the Department presents the following new recommendation:

The Department recommends that the Commission clarify the role of the IDP.

E. RECOMMENDATIONS FOR ENHANCED INFORMATIONAL REQUIREMENTS

In this section, the Department provides discussion and recommendations to improve the quality of information in OTP's IDP, to enhance the usefulness of this plan. The Department especially focusses on the need for detailed information about grid modernization investments.

The Department stresses that the IDP is *the* venue for the Company to provide detailed information about its grid investment plans. In its IDP, OTP should clearly identify its grid investment objectives and the benefits and costs of its planned investments. Further, goals, benefits, and costs should be quantified to the maximum extent possible, although the Company should still address these effects qualitatively if complete quantification is not possible. Even if the Company has already provided relevant information in another proceeding, it should not fear redundancy in including the same information in the IDP. Moreover, the fact that information has already been filed in a separate proceeding does not necessarily obviate the need for OTP to include the same information in its IDP.

i. Cost-Benefit Analysis for Grid Modernization

In its initial comments in this proceeding, the Department noted the absence of required information on the costs and benefits of near-term grid modernization investments. The Department stated the following:

In IDP Filing Requirement 3.D.2.k, the Commission requires that for each grid modernization project included in the 5-Year Action Plan, "Otter Tail Power should provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Otter Tail Power shall provide all information to support its analysis." Discussion of grid modernization filing requirements is provided in Section 9 of OTP's IDP.

The Department finds that the Advanced Metering Infrastructure (AMI), Outage Management System (OMS), and Demand Response Management System (DRMS) projects were not compliant with IDP Filing Requirement 3.D.2k. The AMI and OMS projects have already been approved for cost recovery and [OTP] presented a Cost Benefit Analysis (CBA) in Docket No.

E017/M-21-382 before they were approved for cost recovery. These projects fulfilled the filing requirement in another docket, but OTP did not mention this in their IDP. The DRMS Project has not been approved for cost recovery, and has not presented a CBA, which does not meet the filing requirement.⁸

The Department maintains its position from initial comments that OTP has not provided all of the required information on benefits and costs for its grid modernization investments. Even if cost recovery is not at issue—as for AMI and OMS—the Company should still be including the pertinent cost and benefit information about these investments in its IDP.

In these reply comments, the Department has focused on the missing grid modernization information in OTP's IDP out of a view that reviewing grid modernization in an integrated context is especially key to achieving the objectives of the IDP. As the Department has recently expressed in its comments in other proceedings, grid modernization investments are often optional, interdependent, and interactive with other parts of the distribution grid.

Unlike traditional grid investments that are generally not optional, grid modernization investments are often undertaken electively, because they promise to yield incremental benefits. These benefits may include avoidance of the need for traditional investments, but it is incumbent on the utility to demonstrate that the benefits justify the (elective) costs. This evaluation of benefits and costs should assess the range of alternatives and account for both interdependencies between grid modernization components and interactions with the wider grid.

In light of the above discussion, the Department presents a new recommendation:

The Department recommends that the Commission direct OTP to file a cost-benefit analysis for DRMS in a supplemental filing, to be provided within 180 days of the Commission's final Order in this proceeding.

Next, the Department offers additional discussion of the Department's reply to request for additional information on DRMS that it included in initial comments.

(a) DRMS, CBA, and Decision-making

Noting the apparent lack of information on the benefits and costs of DRMS in OTP's IDP, the Department included the following request for information in its initial comments:

⁸ Department initial comments at page 5.

The Department requests that OTP discuss in reply comments how OTP selected its DRMS vendor, if applicable, including whether costs and benefits were weighed prior to vendor selection, and that OTP present its cost-benefit analysis for the DRMS project, if available.⁹

In response, OTP detailed its procurement efforts to date, stating that “[a]fter a rigorous and extensive evaluation, two strategic partners were selected as the vendors of choice: Landis+Gyr (L+G) and OATI.”¹⁰ However, OTP did not provide a CBA with the reply comments, indicating instead that the CBA (“the business case for the DR project”) would be provided in the next EUIC filing.

As noted above, the Department finds that OTP has not met its requirement to provide detailed cost and benefit information on the DRMS project. Still, the Department acknowledges that the Company provided an estimate of cost for the DRMS project in its reply comments, and that the Company also described benefits for the selected solutions. Thus, the Company does not appear to far off from providing a CBA.

Stepping back, however, the Department is concerned that OTP has not quantified the benefits of DRMS and what the implications might be for how OTP makes investment decisions. To illustrate this point, consider the following two statements from OTP’s reply comments in support of its choice to contract with L+G:

- “Rigorous vetting of alternative cellular options for DR demonstrated that the FAN procured under the AMI project added value to the DR project as the communications backbone.”¹¹
- “Further into discovery, it was determined that the meters deployed under the AMI project could potentially replace a portion of the existing Load Control Devices (LCDs) in the field for a select group of rates. This discovery has the potential to reduce the overall cost of the DR project and optimize asset management to the benefit of the DR program.”¹²

The Department notes that in the above statements OTP does not provide any measurement of benefits. Rather, the Company made general statements about value and cost. While the Department grants that quantification of benefits may be difficult, the Department stresses that OTP should be striving to quantify both the benefits and costs of multiple solutions at the selection stage to ensure that its procurement decisions are as rational and efficient as possible. Stated otherwise, the cost-benefit analysis construct should approximate the Company’s actual decision-making process—CBA should not merely be a tool for retrospective quantitative justification of investment plans once decisions have already been made on other grounds.

⁹ Department initial comments at page 40.

¹⁰ OTP reply comments at page 2.

¹¹ OTP reply comments at page 2.

¹² OTP reply comments at page 2.

(b) Measuring the Impact of Distribution Grid Investments

To optimize planning and investment, OTP should also be endeavoring to quantify the impacts of its traditional distribution grid investment on key dimensions. While the informational requirements for grid modernization are more stringent and extensive for the reasons discussed in the foregoing paragraph, OTP should still aim to quantify the impacts of its traditional expenditures on reliability and capacity. By quantifying the impacts of its investments, OTP can better demonstrate that its various budgets are right-sized, with cost effective investments in grid modernization to maximize customer benefits and minimize overall costs.

To this end, and to the extent relevant and measurable, the Company should be quantifying the following impacts for its investments, irrespective of whether investments are required or discretionary:

- Capacity – marginal expected increase in MW capacity (at the level of system/substation/feeder)
- Reliability – marginal expected increase in reliability, as per SAIDI/SAIFI or other metrics
- Ratepayer impacts – marginal increase/decrease in rates and average bills
- Equity impacts – impacts on reliability, rates/bills, or other metrics by income group, race, environmental justice community, and potentially other dimensions.

The Department recognizes that quantifying investment impacts may be challenging. The Department thus provides the following recommendation, with scope for OTP to address how it will be best able to quantify investment impacts.

The Department recommends that the Commission direct OTP to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal should specifically address the level of granularity at which OTP will evaluate these impacts for each budget category, indicating for each category whether OTP plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories.

ii. NWA

In its initial comments in this proceeding, the Department requested that OTP describe its process for conducting NWA analysis. The Company does not appear to have responded to this request. Thus, the Department presents the following new recommendation:

The Department recommends that the Commission direct OTP to submit a supplemental filing, to be provided within 180 days of the Commission's final Order in this proceeding, with a detailed description of its process for NWA analysis.

iii. Resiliency Metrics

In its initial comments in this proceeding, the Department recommended that the Commission direct OTP to develop a suite of metrics to track resiliency. The Department begins by clarifying this recommendation, which was written with a typographical error. The recommendation in initial comments was provided as follows: "The Department recommends the Commission direct OTP to develop a suite of metrics to track resiliency, including SAIDI and SAIFI, MEDs, and other metrics to the extent warranted."¹³

The Department clarifies that the reference to major event days (MEDs) in this recommendation is incorrect. The correct statement of this recommendation is presented below:

The Department recommends the Commission direct OTP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted.

The Department maintains this recommendation in these reply comments.

In its reply comments, OTP discussed the metrics reported in its recently filed 2023 Safety, Reliability, and Service Quality (SRSQ) Report.¹⁴ OTP offered select metrics already included in its SRSQ Annual Report as examples of metrics that might be used to track resilience performance: System Average Interruption Frequency Index (SAIFI), Customer Average Interruption Duration Index (CAIDI), and Major Event Day (MED) trends.¹⁵ OTP also noted the ongoing electric industry discussion regarding resilience measurements, the lack of a uniform standard for reporting, and ongoing work within the industry regarding reporting standards for power outage data. The Department appreciates OTP's efforts toward developing a set of metrics for tracking resiliency and is interested in hearing more from OTP about the ODIN resiliency standards that were also referenced in the Company's reply comments.

F. BENEFICIAL ELECTRIFICATION PLAN AND RELATED ISSUES

¹³ Department initial comments at page 25.

¹⁴ *Annual Report, In the Matter of Otter Tail Power Company's 2023 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2024, Otter Tail Power Company, Docket No. E017/M-24-30* (April 1, 2024). (eDocket No. [20244-204846-01](#)). Hereinafter "SRSQ Annual Report".

¹⁵ OTP reply comments at page 11.

The Department notes that while the Company is required to include in its IDP information about distributed generation and EVs, it is not similarly obligated to address beneficial electrification. Yet electrification of heat and cooling and other beneficial electrification is key to achieving the state's climate policy goals. As such, the Department requested in its initial comments that OTP provide a plan for accelerating beneficial electrification and to provide forecasts of the expected grid impacts of this beneficial electrification. At minimum, the Department is requesting that OTP provide the same level of information about beneficial electrification as it did for distributed generation and EVs.

The Department observes that some of the beneficial electrification loads present much bigger challenges for grid management than do electric vehicles given that some loads are relatively impervious to load-shifting. For example, it would be unacceptable to shift cooking load to off-peak hours. The coldest part of the day is at night when heat pump loads will be at their highest and for longer durations, which is coincident with the ideal electric vehicle charging window. It is similarly unacceptable to expect long durations without heat input during the coldest days of winter, which may be coincident with future peak loads.¹⁶ Electric-heating-only customers do not have the option to cycle their heat, while dual fuel applications offer more grid adaptability, but also require significantly more planning from the Company. Commercial and industrial electrification poses even greater challenges for managing the distribution grid. Further, long, rural feeders with many homes that rely on propane, fuel oil, or other heating fuels may not be ready to handle increased adoption of beneficial electrification technologies. These examples all illustrate the importance of planning for these new loads now, to incorporate future beneficial electrification into grid planning to avoid costly grid upgrades later.

The Department is not interested in repeating the beneficial electrification discussion provided in OTP's ECO filing. The information requested by the Department is supplemental to OTP's ECO filing. At minimum, the Department expects the Company to determine the number of beneficial electrification devices at a system level, and ideally on each feeder. The company should also share historical adoption rates, ideally at each feeder, and forecast beneficial electrification rates for at least a system-wide level. These forecasts should be used to identify feeders at risk of being unable to supply power to support the increased adoption of beneficial electrification technologies. Ideally, this exercise should be combined with EV forecasting to understand the interactions between these technologies. In fact, IDP Filing Requirement 3.E.3 provides a roadmap for this exercise:

Otter Tail shall provide a discussion of how it plans to optimize EV benefits, including a discussion of how to align charging with periods of lower customer demand and higher renewable energy production and by improving grid management and overall system utilization/efficiency.

¹⁶ Great Plains Institute and the Center for Energy and Environment. Decarbonizing Minnesota's Natural Gas End Uses: Stakeholder Process Summary and Consensus Recommendations. (July, 2021).

Beyond the system-level snapshot of beneficial electrification, the Commission's order from Docket E,G-999/CI-22-624 specifically mentions IDPs and beneficial electrification (other electrification measures) in its order, as reflected by the inclusion of IDP Notice Topic 5:

The utilities shall maximize the benefits of the Inflation Reduction Act in future resource acquisitions and requests for proposals in the planning phase, petitions for cost recovery through riders and rate cases, resource plans, gas resource plans, integrated distribution plans, and Natural Gas Innovation Act innovation plans. In such filings, utilities shall discuss how they plan to capture and maximize the benefits from the Act, and how the Act has impacted planning assumptions including (but not limited to) the predicted cost of assets and projects and the adoption rates of electric vehicles, distributed energy resources, and other electrification measures.

As the IDP is the central reporting mechanism for understanding all critical developments on the distribution grid, the IDP should at least include a discussion of how the IRA is impacting the distribution grid. As discussed in Docket E,G-999/CI-22-624, the Company has an obligation to ensure that the benefits of the IRA are maximized to ensure value to ratepayers. A beneficial electrification plan is expected to be heavily influenced by the IRA. Further, while the ECO Program could potentially be the appropriate venue for the inclusion of tracking all beneficial electrification IRA benefits, the ECO Program will not administer federal and state rebate programs and tax incentives. Beneficial electrification will be addressed in gas utilities' Natural Gas Innovation Act (NGIA) and Integrated Resource Plans (IRP)s. The complexity and interconnectedness of beneficial electrification planning necessitates a broader perspective and plan for the deployment of these programs. This would either require a modification of the ECO Program scope or would require a filing in non-ECO docket. The Department is not taking a position on the proper venue for a plan, but simply advocates for the creation of a plan that takes a broader perspective on all federal and state funding to ensure that ratepayers receive the maximum value from the IRA. Regardless of whether this plan is filed in this docket or another, the plan should be reported in the IDP. The Department welcomes a broader discussion about how beneficial electrification planning should be conducted and in which dockets information should be reported.

While the Department understands that the Commission's September 12th, 2023, order did not allow sufficient time for the Company to include IRA impacts in its IDP filing, the Department requests the supplemental filing to ensure that IRA benefits are maximized by planning before the IRA-funded programs are released. Programs such as HOMES, HEAR¹⁷ and the State Heat Pump Rebate¹⁸ will likely require energy audits and a triage system of energy efficiency improvements that need to happen before a heat pump could be installed. This will require the development of expertise to physically deliver energy audits, but also to organize a system to deliver energy bills and coordinate and fund energy audits to support the program. The Company should be planning ahead of time to educate its

¹⁷ See <https://mn.gov/commerce/energy/consumer/energy-programs/home-energy-rebates.jsp>

¹⁸ See <https://mn.gov/commerce/energy/consumer/energy-programs/heat-pump.jsp>

partners, build internal staff capacity, and have a plan in place for how to maximize the benefits of the new IRA programs.

While OTP stated in reply comments that it is in the process of hiring two energy auditors, there are additional staff capacity and resource requirements needed to implement the program. Given that all of the programs are income based, OTP should identify who its income qualified customers are, and how to ensure equity in the distribution of incentives. Further resources are needed to educate partners and customers on how to navigate the complex web of federal and state rebates, federal tax credits, and utility rebates, as well as to ensure that funding is not double counted in any of these programs. Without this support for customers, there is a significant risk that customers will not succeed in taking advantage of the incentives available to them and end up liable for additional expenses that they had never planned on at the point of sale. Mitigating this risk requires a system to be in place to ensure internal checks on the workflow and process of which funding is eligible, which funding is awarded, and how the cash flow of rebates is directed.

A useful beneficial electrification plan would address these immediate needs. Like the TEP, there is a much higher potential for information to be shared about beneficial electrification throughout all of the regulated utilities' territories. The State of Colorado has implemented a program that requires much more comprehensive data sharing requirements than those discussed already.¹⁹ Adoption of such a program would bring beneficial electrification planning more in line with TEPs.

Finally, the Department seeks to reiterate its initial message that the purpose of beneficial electrification planning at this stage is to simultaneously save ratepayers money and reduce carbon emissions. These goals can only be accomplished with proactive grid planning and engagement to ensure that the unprecedented amount of funding available for beneficial electrification is not underutilized.

G. TEP FILING REQUIREMENT REVISION

In its initial comments in this proceeding, the Department recommended that the Commission revise the IDP filing requirements to identify the sub-sections establishing the requirements for NWA Analysis and the TEP as sections 3.E and 3.F, respectively. OTP agreed with the Department's recommendation to revise the IDP filing requirements to identify the sub-section establishing the requirements for NWA Analysis and the TEP as sections 3.E and 3.F, respectively. The Department maintains this recommendation.

¹⁹ See , [C.R.S. 40-3.2-109](#)

IV. RECOMMENDATIONS

The Department appreciates the opportunity to comment further on OTP's 2023 IDP and TEP. The Department makes the following final recommendations:

- 1. The Department recommends that the Commission accept Otter Tail Power's 2023 IDP, subject to certain modifications.***
- 2. The Department recommends that the Commission clarify the role of the IDP.***
- 3. The Department recommends that the Commission direct OTP to file a cost-benefit analysis for DRMS in a supplemental filing, to be provided within 180 days of the Commission's final Order in this proceeding.***
- 4. The Department recommends that the Commission direct OTP to provide a proposal for measuring the capacity, reliability, ratepayer, and equity impacts of its distribution grid investments in its next IDP. This proposal should specifically address the level of granularity at which OTP will evaluate these impacts for each budget category, indicating for each category whether OTP plans to measure these impacts at the level of the budget category, program, project, or at some other level of resolution, or not at all, and specifically accounting for the impact of any expected changes to IDP budget categories.***
- 5. The Department recommends that the Commission direct OTP to submit a supplemental filing, to be provided within 180 days of the Commission's final Order in this proceeding, with a detailed description of its process for NWA analysis.***
- 6. The Department recommends the Commission direct OTP to develop a suite of metrics to track resiliency, including SAIDI with MEDs and SAIFI with MEDs, and other metrics to the extent warranted.***
- 7. The Department recommends that the Commission direct OTP to provide in its 2025 IDP an update on the Morris Flow Battery Project***
- 8. The Department recommends that the Commission direct OTP to include in its 2025 IDP an update on the Morris, Minnesota impact study and identify the specific investments included in its budget to mitigate risks identified in the study.***
- 9. The Department recommends that the Commission direct OTP to file a supplemental filing that proposes a plan to accelerate beneficial electrification for its customers and provide forecasts of expected grid impacts of the same.***

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
Reply Comments

Docket No. E017/M-23-380

Dated this **19th** day of **April 2024**

/s/Sharon Ferguson

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