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September 20, 2013

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 7th Place East
St. Paul, MN 55101-2147

PUBLIC DOCUMENT – TRADE SECRET DATA HAS BEEN EXCISED

Re: In the Matter of the 2011-2012 Annual Automatic Fuel Adjustment Reports
Minnesota Docket No. E999/AA-12-757
Reply Comments of Otter Tail Power Company

Dear Dr. Haar:

Otter Tail Power Company ("OTP") hereby submits its Reply Comments in response to the Comments filed by the Minnesota Department of Commerce, Division of Energy Resources, in the above-captioned matter.

OTP has electronically filed this document with the Minnesota Public Utilities Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

Should you have any questions regarding this filing, please contact me at 218-739-8279 or stommerdahl@otpco.com.

Sincerely,

/s/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager Regulatory Administration

wao
Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of 2011-2012 Annual Automatic Adjustment Reports	Docket No. E999/AA-12-757

OTTER TAIL POWER COMPANY REPLY COMMENTS

I. INTRODUCTION

These Reply Comments are made in response to the Minnesota Department of Commerce's Division of Energy Resources ("Department") *Review of the 2011-2012 Annual Automatic Adjustment Reports (FYE12 AAA)* issued June 5, 2013, filed in the above-captioned dockets. The Department specifically requested responses to five different questions identified within their review. Otter Tail Power Company ("OTP") addresses those questions within these Reply Comments. In addition, OTP provides comments in response to the Department's proposal for a new fuel cost recovery mechanism. Lastly, OTP is providing updated information with regard to an annual reporting compliance obligation stemming from Docket E017/M-06-1332. While gathering information for the 2012-2013 Annual Automatic Adjustment Reports, OTP discovered that incorrect amounts were reported in the FYE12 AAA, FYE 11 AAA and the FYE10 AAA reports. OTP has attached corrected reports for these reporting periods with these comments.

II. RESPONSES TO THE DEPARTMENT'S QUESTIONS

The following are five questions raised by the Department in their review of FYE12 AAA and outlined in their June 5, 2013 comments along with OTP's corresponding responses to those five questions.

1. MISO DAY 2 CHARGES

The Department has reviewed OTP's MISO Day 2 charges as reported in Attachment K to its 2011-2012 AAA Report. The Department recommends that OTP explain, in reply comments, why the total 2011-2012 MISO Day 2 charges assigned to retail have increased from $16.1 million in 2010-2011 to $28.0 million in 2011-2012.

RESPONSE:

There are two primary drivers for the increased MISO Day 2 charges between AAA reporting periods. They include different treatment on bilateral purchase transactions and generator outages.

First, OTP purchased 50MW of on-peak power for the two AAA reporting periods. However, the purchase for ten months of the 2010-2011 AAA reporting period was made with a counterparty using a financial schedule through the MISO market. When a purchase is made using a financial schedule, OTP pays the counterparty for the full purchase price of the energy and subsequently schedules the energy through the MISO. In turn, OTP receives revenue in the MISO settlement for the energy—offsetting OTP's MISO charges. The energy purchase in the 2011-2012 AAA reporting period was scheduled as a Contract for Differences ("CFD"). When a purchase is made as a CFD, the two counterparties settle the difference between the full purchase price and the Locational Marginal Price ("LMP") between themselves. Therefore, no offsetting revenue is received from the MISO. The MISO financial schedule revenue for the 2010-2011reporting period is 50MW purchase x 10 months x 16 hours/day x 20 days/month x $32.76/MWh = $5.25M.

Second, the difference between the MISO Day 2 charges also is the result of differences in OTP's scheduled outages during the two periods. OTP had limited outages during 2010-2011 (therefore the Day 2 charges are comparatively low). By contrast, OTP had three major scheduled plant outages during the 2011-2012 AAA reporting period (therefore increasing the Day 2 charges over the preceding period). Big Stone was offline from 9/15/2011 thru 12/5/2011 and 6/5/2012 thru 6/16/2012. Coyote was offline from 3/30/2012 thru 5/14/2012. Using average LMP values during these periods to

estimate the impact, the lost MISO revenue relating to these three scheduled outages includes:

Start	Stop	Days	Unit	Lost MW*	Hours	Average LMP	Estimated Lost Revenue
9/15/2011	12/5/2011	81	Big Stone	189	1944	$20.87	$7,667,972
3/30/2012	5/14/2012	45	Coyote	103	1080	$17.52	$1,948,925
6/5/2012	6/16/2012	11	Big Stone	189	264	$25.61	$1,277,837
						Total	$10,894,733

* Estimate of expected clearing between on and off-peak periods. Max output (Big Stone: 256MW; Coyote 140MW)
Assumes full output during on-peak and minimum output during off-peak.

2. DA FBT LOSS AMT

OTP's Day Ahead Energy Losses (DA FBT Loss Amt) totaled $610,998.99 in August, 2011. This is significantly higher than the costs charged to other months during the 2011-2012 AAA reporting period. The Department recommends that OTP explain, in reply comments, why the Company incurred such large Day Ahead Energy Losses (DA FBT Loss Amt) in August, 2011.

RESPONSE:

As background, the DA FBT Loss Amt reflects the amount of financial energy losses paid by OTP to the MISO for moving energy from Big Stone and Coyote to OTP's retail load. The charge per MWh for losses is determined by the LMP market (the difference in the Marginal Loss Component of the LMP between the generator and the load). The volume (MWh) is determined by the market clearing results for OTP's generators. In addition, OTP receives a refund of the excess loss collection on these schedules through the DA GFAOB RBT LS (resulting in a 50% reduction in loss costs for these two units).

During the reporting month of August 2011, the average LMP losses between Big Stone and OTP load were the second highest for the reporting year for Big Stone; slightly over 40% more than the reporting year average. Average losses between Coyote and OTP load during the same time period were nearly 30% more than the reporting year average; the largest cost for Coyote for the reporting year. In addition, generation was the highest at these two stations during the month of August 2011. These two factors, the cost of losses and the amount of generation, were the direct causes of the higher costs.

3. DA FBT CONGESTION AMT

OTP's Day Ahead Congestion (DA FBT Congestion Amt) costs totaled $245,090.15 in June, 2012. This is significantly higher than the costs charged to other months during the 2011-2012 AAA reporting period. The Department recommends that OTP explain, in reply comments, why the Company incurred such large Day Ahead Congestion (DA FBT Congestion Amt) costs in June, 2012.

RESPONSE:

As background, the DA FBT Congestion Amt reflects the amount of financial congestion paid by OTP to MISO for moving energy from Big Stone and Coyote generating stations to OTP's retail load. The charge per MWh for losses is determined by the LMP market (the difference in the Marginal Congestion Component of the LMP between the generator and the load). The volume (MWh) is determined by the market clearing results for OTP's generators. OTP receives a full refund of these charges through the DA GFAOB RBT CG charge type—therefore, this charge type has no impact on retail customer costs.

For the accounting month of June 2012, the monthly average congestion between Big Stone and OTP load was $0.96 more than the AAA reporting year average. The congestion between Coyote and OTP load during these same time references was nearly $1.30 more. This increase in congestion, determined by the MISO market, is the direct cause of the higher costs in June 2012 compared to other months in the 2011-2012 AAA reporting period.

4. ALLOCATION METHODS

The Department also reviewed OTP's allocation of its MISO Day 2 charges across its various customer categories. The Department described OTP's allocation methods in detail in the Department's Review of the 2010-2011 Annual Automatic Adjustment Reports.54 The Department recommends that OTP explain, in reply comments, if any of the Company's allocation methods have changed during the 2011-2012 reporting period. If so, the Department recommends that OTP explain, in reply comments, the nature of these changes and the effect these changes have had on the charges assigned to various customer categories in the 2011-2012 AAA Report.

RESPONSE:

There were no changes to OTP's allocation methods during the 2011-2012 reporting period.

5. ASM NET BENEFITS

The Department notes in Section VIII.D that ASM net benefits have decreased significantly from $230,559 in 2010-2011 to $32,764 in 2011-2012. The Department recommends that OTP explain this decrease in reply comments. The Department recommends that the Commission not accept OTP's ASM reporting at this time until the Company has provided the required information in its reply comments.

RESPONSE:

There are two primary drivers for the reduction in net ASM benefits between the AAA reporting periods: a significant reduction in ASM prices and generator outages.

As background, ASM net benefits are comprised of revenues received from MISO for selling the three market-based ancillary services (regulation, spinning reserve, and supplemental reserve) netted against the cost charged to OTP for its share of ancillary service costs in the MISO footprint. OTP offers all three ancillary services from eligible units along with energy. MISO's market simultaneously co-optimizes the selection of energy and ancillary services for each unit—maximizing each generator's revenue. Therefore, clearing fewer ancillary services is not necessarily a concern as it likely means that additional energy revenue was received.

The ancillary service clearing prices for 2011-2012 dropped significantly relative to 2010-2011. Average regulation prices fell by 25%, spinning reserve by 28%, and supplemental reserve by 18%. As ASM prices fell, OTP's units were less likely to clear, and when they did clear, generated less ASM revenue.

Also, as described above, OTP had three major scheduled plant outages during the 2011-2012 AAA reporting period, but OTP did not have any major outages during 2010-2011. Big Stone was offline from 9/15/2011 thru 12/5/2011 and 6/5/2012 thru 6/16/2012. Coyote was offline from 3/30/2012 thru 5/14/2012. Reduced unit availability for these major stations directly reduced the amount of ASM revenue over the period.

III. RESPONSE TO THE DEPARTMENT'S PROPOSAL FOR A NEW FUEL COST RECOVERY MECHANISM

In its June 5, 2013 Comments in this Docket, the Department submitted a proposal for an alternative mechanism to handle fuel costs. Subsequent to those Comments and the Commission Order issued in the *FYE2011 AAA* docket, the Department filed Comments on September 5, 2013 in that docket, stating that *"the Department recommends that the Commission convene a meeting with all interested parties to discuss the benefits, difficulties, expectations and other matters pertaining to the operation of the FCA."*

OTP responded to those Comments on September 12, indicating that *"OTP affirms that it is willing and interested in such a meeting, and agrees that it would be desirable to attempt to move the parties closer together as they consider how to improve the process of reviewing the operation of utilities' FCAs."* OTP reaffirms its interest in such a meeting and its hope that such a meeting will move the parties closer together on these important issues.

These Comments also respond to the Department's request for alternatives to the current FCA to incentivize utility focus on FCA related utility performance. OTP understands that the Department's alternative proposal begins from the premise that utilities do not have adequate focus on plant operations, which can affect fuel and purchased power costs. OTP believes that its Key Performance Indicator mechanism (described below) and its plant performance statistics will show that it currently operates with focus on these issues and that focus has been successful. Because OTP agrees with Xcel Energy's Comments that the Department's proposal would have several unintended negative consequences for its operations and for ratepayers, OTP does not believe such an approach should be pursued. Also, because OTP believes that its current KPI mechanism has successfully focused its employees and operations on plant performance, OTP requests that this KPI mechanism be viewed as a reasonable alternative to the Department's proposal, at least for OTP.

As noted, the Department's Comments and its proposal begin from a premise that utilities have not focused their attention on plant performance, but we believe that the

historical record does not bear this out for OTP. Instead, the principles under which OTP has been operating for many years demonstrate OTP's commitment to doing all that it can to keep energy costs as low as possible for its customers through efforts to incentivize and maximize our own generation facility performance.

Our total fuel costs are comprised of the costs incurred to generate electricity from our low cost plants, as well as the costs incurred through purchases of energy from other sources. Management of fuel and purchased power costs is a significant area of focus for the entire company at OTP. So much so, that it is an integral part of OTP's Mission Statement which begins with the following statement:

> *"Our mission is to produce and deliver electricity as reliably, economically, and environmentally responsibly as possible …"*

And OTP's focus on these issues does not stop there. OTP management has developed mechanisms to motivate employees to fulfill its mission, including its KPI mechanisms, which are described in greater detail later in these Comments. These mechanisms have been successful and resulted in higher plant performance and lower fuel and purchased power costs for OTP ratepayers.

Comparison to Industry Average Plant Availability – GADS Data

From a fuel cost perspective, the most effective way for OTP to minimize fuel cost impact to its customers is to keep the generating plants operating and producing the low cost energy they were designed to produce.

When measuring the performance of OTP's conventional generating facilities against aggregate industry performance, OTP consistently meets or exceeds industry average performance as compared to similar plants (Type and size). The North American Electric Reliability Corporation ("NERC") collects and reports through the Generating Availability Data System ("GADS"), operating performance information for conventional generating units. The following tables show both yearly plant availability levels compared to industry average for similar sized plants as well as comparisons based on a 5 year rolling average plant availability measure. The 5 year rolling average

measure helps to incorporate extended maintenance outages into the comparison to industry averages which would also have extended planned maintenance outages embedded into those averages.

Otter Tail Power
Yearly Plant Availability Compared to GADS Avg
2003 - 2012

	Big Stone 475 MW	Coyote 427 MW	Coal 400 - 599 MW GADS Avg		Hoot Lake #2 60 MW	Hoot Lake #3 84 MW	Coal 1 - 99 MW GADS Avg
2003	87.55	79.4	83.61	2003	98.3	98.8	85.7
2004	92.28	91.5	84.96	2004	91.8	69.5	86.18
2005	77.73	89.21	83.36	2005	98.9	97.7	85.2
2006	82.17	81.23	84.52	2006	96.3	87.5	86.9
2007	64.2	86.26	82.42	2007	97.6	98.4	82.48
2008	92.45	87.6	83.98	2008	56.8	95.8	82.37
2009	91.56	72.5	82.04	2009	92.1	72.0	84.06
2010	92.95	87.8	n/a[1]	2010	95.51	97.3	n/a[1]
2011	74.3	89	82.67	2011	97.78	98.3	83.89
2012	91.27	69.7	81.39	2012	96.01	97.6	84.05

= major outage year
= equivalent avialability for Big Stone Plant was negatively affected by derates during 2006 caused by a DOE-sponsored environmental emissions demonstration project. That equipment was subsequently removed.

1. 2010 single year GADS values were not available in the on-line database.

Otter Tail Power
5 Year Average Plant Availability Compared to GADS Avg
2003 - 2012

5-Year averages	Big Stone	Coyote	Coal 400 - 599 MW GADS Avg	5-Year averages	Hoot Lake #2	Hoot Lake #3	Coal 1 - 99 MW GADS Avg
2003 -07	81.62	83.36	83.51	2003 -07	88.34	90.28	85.67
2004-08	84.67	83.08	82.88	2004-08	87.66	90.19	85.45
2005-09	83.09	84.63	82.72	2005-09	87.96	92.35	86.37
2006-10	88.51	81.32	82.23	2006-10	87.64	92.19	85.4
2007-11	87.52	79.75	81.97	2007-11	95.35	91.29	84.64
2008-12	86.17	82.17	81.86	2008-12	96.43	97.72	84.08

For many years, OTP management has established an annual company-wide Key Performance Indicator ("KPI") on Equivalent Plant Availability. It is one of five company-wide KPI's[1] that are measured as part of OTP's company-wide annual Key Performance Award ("KPA") employee incentive plan[2].

[1] In addition to Plant Equivalent Availability, OTP establishes company-wide KPI's for Reliability, Customer Satisfaction, Safety, and Operation and Maintenance Expenses.
[2] The KPA program is eligible to all non-executive management employees except for those who are party to a collective bargaining agreement.

OTP President Charles MacFarlane provided the following explanation of Equivalent Availability in OTP's 2007 general rate case, Docket E017/GR-07-1178:

> "*Equivalent availability represents the portion of time that a generating unit is available to operate, including consideration of the lost capacity effects of partial equipment deratings when the unit was available but at less than full capacity. Performing well on the equivalent availability measure is important because OTP has invested in very low-cost generating plants that typically produce energy well below market prices. Therefore, we can reduce our overall energy costs by making sure we get every megawatt hour out of those plants that is reasonably possible.* ***By far, our performance and equivalent availability has more impact on OTP's fuel and purchased power costs than does any other factor over which we have any reasonable control.*** *That's why we have chosen to use it as one of our primary KPIs."*[3]

In addition to the five company-wide KPIs established annually, each department within OTP also establishes their own KPI's which support the overall company-wide KPI's. Fuel costs are also a separate KPI within the generation department and each plant establishes a plant-specific equivalent availability KPI. OTP management establishes the overall Equivalent Plant Availability goal, taking into account, plant maintenance schedules that are applicable to the generating fleet. Meeting or exceeding the Equivalent Plant Availability goal triggers that KPI's incentive payment to all employees who are eligible to participate in the KPA plan. The goals for plant availability are aggressive goals, not easy to meet, conveying the importance of, and high expectation for, keeping the plants operating. The following table summarizes the annual goals from 2007 through 2013 and the actual performance against those goals:

Equivalent Plant Availability KPI			
Year	Goal	Actual	Incentive % Payout
2007	>= 86.0%	78.62%	0%
2008	>=89.7%	87.99%	0%
2009	>=88.1%	83.61%	0%
2010	>=90.5%	92.34%	1%
2011	>=85.7%	84.04%	0%
2012	>=87.5%	86.50%	0%
2013	>=88.9%		

[3] EX. 7 MacFarlane, C. Rebuttal at10 in Docket E-017/GR-07-1178 (emphasis added)

As noted earlier, the goals vary from year to year. In years where an extended planned outage is scheduled, the targeted availability goal for the generation fleet is adjusted accordingly. In all instances, the annual goal for Equivalent Plant Availability exceeds industry averages for plant availability as reported by NERC.

As discussed earlier, OTP's plants have exceeded the performance of comparable plants in the industry. These KPI mechanisms have been an important motivator for our employees in achieving these high levels of performance. Because these are the objectives sought by the Department, OTP believes that its KPI mechanism should be considered a reasonable alternative to the Department's proposal, at least for OTP.

Big Stone and Coyote are Jointly Owned Plants

One additional factor to note for OTP's plant operations is that its two largest plants are jointly-owned units. OTP is operator for both the Big Stone and Coyote Generating stations, but OTP is only a partial owner of these facilities. The other owners of these facilities rely on OTP for day-to-day operations and to maintain the plants in a manner which maximizes the plant's availability to generate low cost electricity. An operating committee of representatives from each of the plant's owners determines annual maintenance schedules and plant capital and O&M budgets. This joint-operations approach to plant ownership provides OTP ratepayers with significant benefit in that they get the benefit of larger economies of scale and an additional level of oversight by the other owners, who have as similar interest in keeping plant availability high. It also shows, however, that as a practical matter OTP is not unilaterally able to change plant operations and budgets. Therefore, if the Commission does desire to consider a change to the FCA or any other mechanism with the intention of changing plant operations and/or budgets, it should note that OTP does not have the ability to make such changes unilaterally and that any mechanism should not put OTP in the position where it cannot be responsive to the other owners of the plants.

In summary, as noted above, OTP believes that its current KPI mechanism should be affirmed as an appropriate alternative to the Department's proposal to change the FCA. The historical performance of OTP's plants demonstrates that this mechanism has worked well for OTP and its ratepayers.

IV. UPDATED INFORMATION FOR COMPLIANCE REPORT AS ORDERED BY DOCKET E017/M-06-1332

The Compliance Report submitted in each annual *AAA Report* compares the energy rate paid actually paid by the customer on Fixed Rate Pricing ("FRP") to a retail rate based on System Marginal Energy Pricing ("SMEP"), had the customer been on SMEP.

While preparing OTP's compliance report from Docket E017/M-06-1332 for the most recent *FYE13 AAA* reporting period, OTP discovered that due to an administrative error, incorrect amounts were provided in the compliance reports for the *FYE12 AAA, FYE11 AAA, and FYE10 AAA* reporting periods with regard to what the retail rate of energy would have been, had the SMEP been used to determine the rate paid by the customer. The following Attachments provide the corrected compliance reports for the respective reporting years.

Attachment A	2009/2010 Compliance Report
Attachment B	2010/2011 Compliance Report
Attachment C	2011/2012 Compliance Report

The correct amounts were reported in the most recent *FYE13 AAA* filing. OTP apologizes for any inconvenience this may have caused.

V. CONCLUSION

OTP appreciates the opportunity to provide these comments and to address the Department's questions in this Docket. If further information is desired, please contact the undersigned.

Dated:

Respectfully submitted,

OTTER TAIL POWER COMPANY

By /s/ STUART TOMMERDAHL

Stuart Tommerdahl
Manager, Regulatory Administration
215 South Cascade
Fergus Falls, MN 56538-0496
218-739-8279

VIII. OTTER TAIL POWER COMPANY COMPLIANCE REPORT AS REQUIRED BY ORDER IN DOCKET E-017/M-06-1332

As ordered in Docket No. E-017/M-06-1332, issued January 16, 2007, (In The Matter of Otter Tail Power Company's Petition for Approval of an Electric Service Agreement with Enbridge Energy, Limited Partnership) Otter Tail submits the following compliance report with its Annual Automatic Adjustment of Charges report (AAA) filed under Minnesota Rules part 7825.2800.

For convenience, the conditions are listed with the same numbering system as the order in Docket No. E-017/M-06-1332 used.

b. As part of its annual automatic adjustment filing, Otter Tail shall report the following information:

- **the amount of incremental energy purchased by the customer under the LGS Rider,**

Trade Secret Data Begins….

…Trade Secret Data Ends

- **the retail rate paid by the customer on Fixed Rate Energy Pricing,**

Trade Secret Data Begins….

…Trade Secret Data Ends

- **and the retail rate of the energy had System Marginal Energy Pricing been used to determine the retail rate paid by the customer**

Trade Secret Data Begins….

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Trade Secret Data Begins….

…Trade Secret Data Ends

- **and the retail rate of the energy had System Marginal Energy Pricing been used to determine the retail rate paid by the customer.**

Trade Secret Data Begins….

…Trade Secret Data Ends

CERTIFICATE OF SERVICE

Re: In the Matter of the 2011-2012 Annual Automatic Fuel Adjustment Reports
Minnesota Docket No. E999/AA-12-757

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar 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 of Otter Tail Power Company

Dated this **20th** day of **September 2013**.

/s/ WENDI A. OLSON
Wendi A. Olson
Regulatory Filing Coordinator
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