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June 1, 2018

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

**PUBLIC DOCUMENT - NOT
PUBLIC (OR PRIVILEGED) DATA HAS
BEEN EXCISED**

**RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard
Docket Number E999/M-18-205**

Dear Mr. Wolf:

In response to the Minnesota Public Utilities Commission Notice issued April 14, 2017 in above described matter, Otter Tail Power Company hereby submits its Solar Energy Standard Report.

Portions of the enclosed Report are marked "PROTECTED DATA" because those portions contain information Otter Tail considers to be trade secret data under Minn. Stat. § 13.37(1)(b). This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. Otter Tail has taken reasonable efforts to maintain the secrecy of the information marked as TRADE SECRET. Specifically, the trade secret information contains detailed information regarding identities and kWh consumption of customers excluded from the Solar Energy Standard. As stated in the report, nine customers have been exempted under Minn. Stat. § 216B.1691, subd. 2f(d)(1) and (2).

This filing has been served on all persons on the attached service list by electronic service or by First Class mail. A Certificate of Service is also enclosed.

Should you have any questions, please contact me at bhdraxten@otpc.com or (218) 739-8417.

Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager Resource Planning

jch
Enclosures
By Electronic filing
c: Service List

An Equal Opportunity Employer

Minnesota Public Utilities Commission			
INFORMATION DOCKET E999/M-18-205		Reporting Period:	January 1, 2017 - December 31, 2017
Solar Energy Standard Annual Report		Utility:	Otter Tail Power Company
Report Year:	2017	Date Submitted:	June 1, 2018

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Minnesota Public Utilities Commission			
INFORMATION DOCKET E999/M-18-205	Reporting Period:	January 1, 2017 - December 31, 2017	
Solar Energy Standard Annual Report	Utility:	Otter Tail Power Company	
Report Year:	2017	Date Submitted:	June 1, 2018

Solar generation on the utilites' system during the reporting period					
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.E					
	Number of Facilities on Utility System	Capacity	Number registered in M-RETS	Capacity registered in M-RETS	SRECs Generated
Less than 20/40kW	21	263 kW	12	113 kW	24
Greater than 20/40kW					

Estimated amount of solar generation a utility would be required to obtain in 2020		
Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Points 4.F & 4.G		
	Capacity (MW)	SRECs (MWh)
Entire 1.5% Standard	30 MW	40,000 MWh
Small Scale Carve-Out (10% of 1.5%)	3 MW	4,000 MWh
2030 Goal of 10%	200 MW	260,000 MWh

Breakdown of S-RECS generated

Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 5

	Balance at Beginning of Reporting Year	Accrued in Reporting Year	Used in Reporting Year	Year End Balance
1. Utility-owned solar projects				
2. Solar Facilities that have entered into a PPA with the utility				
3. Community Solar Gardens (ARR)				
a. Receiving an incentive (any type)				
b. Not receiving an incentive				
4. Community Solar Gardens (VOS)				
a. Receiving an incentive (any type)				
b. Not receiving an incentive				
5. Facilities receiving a VOS rate (not included above)				
6. Facilities under a net metering tariff				
a. Receiving an incentive (any type)				
b. Not receiving an incentive	20	24	0	44
7. Facilities receiving an incentive (not included above)				
8. Facilities that do not fall into any other category				
Total	20	24		44

Purchases and sales of S-RECS to meet the SES

Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.K

	SRECS Purchased	SRECS Sold
SES (>20k/40W)	27,056	-
Small Scale Carve Out (<20/40kW)	-	-
Total	27,056	-

1. Summary of ongoing efforts to obtain solar energy, including a brief summary of the anticipated mix of project sizes for SES compliance.

Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.H

Otter Tail Power Company (the “Company” or “Otter Tail”) has had discussions with various solar developers about projects that could be in operation in time to fully utilize the 30% ITC. To take advantage of economies of scale, the Company has been focused on single projects (20 MW to 30 MW in size) to meet the utility scale portion of the SES. The installed cost of solar projects continues drop and technology continues to improve solar net capacity factors which reduces the overall cost of solar energy. At this time, even with the reduced cost of solar energy, solar resources may not be viewed as a least cost resource in all the jurisdictions the Company serves. Otter Tail intends to continue to operate as one integrated system with one resource mix. The Company has been purchasing Solar Renewable Energy Credits (SRECs) to comply with the SES as a bridge until solar energy can be a least cost resource in all the jurisdictions the Company serves.

2. Progress towards the 10% carve out for systems less than 20/40 kW, including the method by which the utility will meet the carve out. *Docket No. E999/CI-13-542, Commission Order (April 25, 2014), Order Point 4.I*

For Otter Tail: outline a specific plan for compliance with the Solar Energy Standard small-scale obligation, including any one or more of the following: anticipated yearly capacity installations for small-scale solar facilities, a plan for a Community Solar Garden, or specific facilities for small SREC purchases. *Docket No. E999/CI-13-542, Commission Order (October 20, 2017), Order Point 2*

Otter Tail’s research covering residential and commercial solar PV market potential indicates that meeting the ten percent carve out by 2020 will be a challenge for the Company and its customers. The Company continues to evaluate strategies to meet the ten percent carve out for systems less than 40 kW in size. The Company believes that multiple approaches and programs will need to be implemented to meet the ten percent carve out by 2020. The Company’s objective is to meet this standard as cost effectively as possible while minimizing upward pressure on customer rates and cross subsidization

between different classes of ratepayers. The Company is monitoring forecasts from numerous sources in the solar industry indicating a continued decline in costs of solar PV systems.

Otter Tail issued a request for proposal (RFP) in the fall of 2017 to build a Company-owned 40 kW solar project. Otter Tail received several bids from interested solar installers. After detailed discussion with the installers it was determined starting construction in the spring of 2018 would be most beneficial. Currently Otter Tail is evaluating the project and determining if another site(s) are more appropriate than the original location. Otter Tail is still determined to install at least 40 kW of Company-owned solar in 2018.

Despite significant communications and promotion to our communities, Otter Tail didn't have any customers participate in its Publicly Owned Property Solar (POP Solar) program in 2017. Our communities and schools showed great interest, but unfortunately no projects reached implementation. The Company is again hearing lots of interest, with one 37.8 kW project completed in 2018, and is hopeful more customers leverage the approximately forty percent project rebate the Company is offering for participation. Otter Tail plans to monitor its program and if participation remains poor we will re-evaluate the level of customer incentives offered.

On April 19, 2018, the Deputy Commissioner of the Department of Commerce, Division of Energy Resources, approved Otter Tail's request to move dollars budgeted for the Made in Minnesota program¹ to additionally fund the POP Solar program. This approval doubles the POP Solar program budget to \$229,720 annually or about 180 kW of potential installed solar. The Company is excited to utilize these additional funds for solar projects in 2018 and 2019.

¹ Otter Tail included a budget of \$114,860 in its 2018 and 2019 Conservation Improvement Programming. Legislation by the 2017 legislature repealed the Made in Minnesota program to new applicants after May 1, 2017.

In addition to promoting the POP Solar program through CIP, Otter Tail continues to research strategies to meet the solar carve out, including (a) a utility-scale solar PV project with customer subscriptions, (b) building several Company-owned small solar facilities, (c) purchasing small-scale solar renewable energy credits (SRECs), tracked by the Midwest Renewable Tracking System (M-RETS), and (d) Otter Tail administering its own solar incentive program outside of CIP.

Outside of a significant change to statutory eligibility rules, Otter Tail will most likely not meet the ten percent small scale carve out requirement with customer-owned or Company-owned systems in 2020. Otter Tail most likely will rely on purchasing SRECs from small solar facilities registered in M-RETS. The Company has investigated the potential for purchasing small-scale SRECs from solar projects registered in M-RETS. SREC brokers have indicated there are SRECs available for Otter Tail's purchase. At this time the Company has not purchased any small SRECs, but we are monitoring opportunities in the SREC market to minimize cost to ratepayers.

3. Discussion on the utilities' efforts to reach, by 2030, the energy goal that ten percent of the retail electric sales in Minnesota be generated by solar energy.

Docket Nos. E999/CI-13-542, E999/M-16-342, Commission Order (November 28, 2016)

Otter Tail plans to evaluate the ten percent solar goal as a sensitivity in its next Integrated Resource plan that is scheduled to be filed in June, 2019.

4. Any additional comments or materials the utility may wish to include.

CERTIFICATE OF SERVICE

**RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar
Energy Standard
Docket Number E999/M-18-205**

I, Jana C. Hrdlicka, 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 lists by electronic service or by first class mail.

**Otter Tail Power Company
Report**

Dated this **1st** day of **June, 2018**

/s/ JANA HRDLICKA

Jana Hrdlicka
Regulatory Filing Coordinator
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