

July 13, 2017

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

**RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E017/M-17-246

Dear Mr. Wolf:

On March 31, 2017, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its *2016 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider* (Petition). The Petition included a proposal to increase the Company's Conservation Cost Recovery Adjustment (CCRA) to \$0.00754 per kWh from the current \$0.00275 per kWh, an increase of 174 percent, effective October 1, 2017.<sup>1</sup>

On May 1, 2017, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted comments that included a recommendation for the Minnesota Public Utilities Commission (Commission) to approve the proposed CCRA. In those comments, the Department also recommended that the Company update its carrying charge rate to reflect the new short term cost of debt, beginning the month the Commission issues its Order in the Company's rate case in Docket No. E017/GR-15-1033.

On May 16, 2017, the Company filed reply comments agreeing with the Department's recommendations.

On May 19, 2017, the Midwest Large Energy Consumers (MLEC) filed comments stating that the proposed increase will coincide with two other rate increases—the increase to base rates as well as the increase from the Energy-Intensive-Trade-Exposed (EITE) Rider—and asked that the Commission spread out the CCRA increase over a minimum of two years to moderate impact to ratepayers.

On June 2, 2017, the Department submitted comments agreeing with MLEC that the proposed rate increase may result in rate shock to certain customers, particularly in combination with the other rate increases. The Department asked that Otter Tail provide a CCRA calculation based on a 24-month amortization.

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<sup>1</sup> As noted in the Petition, the significant increase is largely due to 2 of OTP's large customers becoming CIP-exempt as of January 1, 2017.

On June 16, 2017, Otter Tail submitted comments supporting the Department’s initial comments, disagreeing with the Department’s second comments, and providing a comparison of a 12-month versus a 24-month amortization schedule. The Company stated that neither of the other two rate increases mentioned by MLEC should be considered as contributing factors to rate shock. The Company argued that the rate case increases have already been borne by customers, as interim rates will have been in effect for 18 months at the time the rate case ends; furthermore, as final rates are lower, customers will actually be receiving a refund. The increases from the EITE Rider, the Company argued, will simply be too small to have a meaningful impact on customer bills.

The Department appreciates Otter Tail’s provision of CIP Tracker projections using the 12-month versus 24-month recovery periods. The Department reviewed these and notes that while Otter Tail incorporated the new carrying charge rate into the CIP tracker beginning in May 2017, the Company did not adjust the CCRA calculations to reflect the change. With the additional carrying charges, the CCRA in both scenarios are slightly higher than what Otter Tail projected. The Department provides here each CCRA calculation using the updated carrying charge rate:

**Table 1. CCRA Based on 12-Month versus 24-Month Amortization Scenarios, Updated to Reflect a Carrying Charge Rate of 2.55%**

<b>12-Month Amortization (Oct 2017-Sept 2018)</b>		<b>24-Month Amortization (Oct 2017-Sept 2019)</b>	
Beginning Balance	\$8,224,728	Beginning Balance	\$8,224,728
CIP Expenditures	\$7,537,653	CIP Expenditures	\$15,078,010
Financial Incentive	\$1,955,200	Financial Incentives	\$3,848,213
Carrying Charges	\$99,430	Carrying Charges	\$193,333
CCRC Recovery	(\$3,985,216)	CCRC Recovery	(\$7,953,865)
Total to be Recovered	\$13,831,796	Total to be Recovered	\$19,390,419
kWh Sales	1,787,092,296	kWh Sales	3,566,755,656
CCRA	\$0.00774/kWh	CCRA	\$0.00544/kwh
<b>12-Month Amortization (Oct 2018-Sept 2019)</b>			
Beginning Balance	(\$299)		
CIP Expenditures	\$7,540,357		
Financial Incentive	\$1,893,013		
Carrying Charges	(11,709)		
CCRC Recovery	(\$3,968,649)		
Total to be Recovered	\$5,452,713		
kWh Sales	1,779,663,360		
CCRA	\$0.00306/kWh		

In Otter Tail's preferred scenario (the 12-month amortization scenarios), the first twelve-month period results in a CCRA of \$0.00774/kWh, which is an increase of 181.5 percent over the current CCRA of \$0.00275/kWh; the second 12-month period predicts a CCRA of \$0.00306/kWh, which is an increase of 11.3 percent over the current CCRA. In MLEC's preferred scenario (the 24-month amortization scenario), the period results in a CCRA of \$0.00544 over the full 24-month period, which is an increase of 97.8 percent over the current CCRA.<sup>2</sup>

The primary impact on the CIP tracker between the two 12-month scenarios and the one 24-month scenario is the difference in carrying charges: under two years of 12-month scenarios, the total carrying charges paid to the Company is \$87,721, whereas under the 24-month scenario, the total carrying charges paid to the Company is \$193,333.

Historically, the Department has tended to favor of a 1-year recovery timeline as the assumption for the CCRA calculation. This not only ensures that current customers are paying current costs, but also reduces carrying charges. However, as the Department noted in its previous comments, the Company's proposed increase may be difficult for customers to absorb within one year; this is true even without taking into account the rate increases from the rate case and the EITE rider. In Attachment A, the Department has reproduced the Company's *Comparison of Monthly Bill Impacts* Table from Exhibit 2 of its original Comments, but has updated the CCRA to reflect those calculated in Table 1 with the updated carrying charge rate. The Department notes that under the 24-month amortization schedule, no customer's monthly bill exceeds a 5% increase. Under a 12-month scenario, all but the Residential and Lighting classes would experience a greater than 5% increase on monthly bills.

The Department notes a third option that merits consideration. Otter Tail's CCRA calculation includes next year's projected incentive.<sup>3</sup> That is, rather than beginning recovery of the financial incentive after it is approved, the Company recovers the incentive "as it is being earned." So the \$0.00754/kWh CCRA reflects a projected incentive for 2017 CIP activities, to be approved in the Company's 2018 filing. Removing the projected financial incentive from this year's CCRA calculation would lower the CCRA and defer recovery of the projected incentive until next year's CCRA is approved.

The Department notes that the Commission could require OTP to remove the projected financial incentive from the CCRA calculation on a one-time basis to help mitigate the large CCRA increase at the present time, but allow recovery of the financial incentive as it is being earned in OTP's subsequent CCRA approval proceedings.

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<sup>2</sup> Under a 24-month amortization schedule, the Company does not "lock in" a CCRA; Otter Tail would still need to return to the Commission next year and propose a new rate based upon the activities of the CIP tracker. However, the CCRA under a 24-month amortization schedule may be close to the CCRA of the first twelve months.

<sup>3</sup> CenterPoint Energy, Minnesota Energy Resources Corporation, and Xcel Energy also include a projected not-yet-approved financial incentive when calculating a CCRA; Great Plains Natural Gas and Minnesota Power do not; Greater Minnesota Gas has not yet requested a financial incentive.

In the below table, the Department shows the calculation of a CCRA without the projected incentive for the first twelve months, and returning to the presently used incentive recovery schedule in the second twelve months:

Table 2. Department’s Modified CCRA Calculation

<b>12-Month Amortization without Financial Incentive for 2017 Activities (Oct 2017-Sept 2018)</b>	
Beginning Balance	\$8,224,728
CIP Expenditures	\$7,537,653
Carrying Charges	\$122,709
CCRC Recovery	(\$3,985,216)
Total to be Recovered	<u>\$11,899,874</u>
kWh Sales	<u>1,787,092,296</u>
CCRA	\$0.00666/kWh
<b>12-Month Amortization with Financial Incentives for both 2017 and 2018 CIP Activities (Oct 2018-Sept 2019)</b>	
Beginning Balance	1,953,039
CIP Expenditures	\$7,540,357
Financial Incentive, 2017 Activities	\$1,955,200
Financial Incentive, 2018 Activities	\$1,893,013
Carrying Charges	(9,368)
CCRC Recovery	(\$3,968,649)
Total to be Recovered	<u>\$3,363,592</u>
kWh Sales	<u>1,779,663,360</u>
CCRA	\$0.00526/kWh

Under this CCRA option, most customer classes would see monthly bill increases of about 5 percent in the first year when compared to current monthly bills; the Interruptible Load and Deferred Load classes would experience monthly bill increases closer to 7 percent. These impacts would drop off slightly in the second year. In all three scenarios—Otter Tail’s preferred scenario, MLEC’s preferred scenario, and the modified CCRA calculation option—the CCRA would return to a more stable rate in the third year.

While the Department continues to support minimizing carrying charges, the increased CCRA due to the change in CIP-exempt status of 2 large customers is concerning. The Department does not oppose any of the three options outlined above; however given that the CCRA increase can be mitigated by removing the projected and not-yet-approved 2017 financial incentive, the Department recommends that the Commission require OTP to remove the projected 2017 financial incentive from the 2016 CCRA calculation, resulting in a CCRA of \$0.00666 per kWh beginning October 2017.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ DANIELLE WINNER  
Rates Analyst

DW/lt

				Bill Impacts of 12-Month Amortization Schedule (CCRA set at \$0.00774/kWh)			Bill Impacts of 24-Month Amortization Schedule (CCRA set at \$0.00544/kWh)			Bill Impacts of 12-Month Amortization Schedule w/o Projected Incentive (CCRA set at \$0.00666/kWh)		
				Otter Tail Preferred			MLEC Preferred			Department Modified Option		
Rate Class	Avg kWh/Bill	Avg \$/Bill before CCRA	Current Monthly CCRA Recovery	Monthly CCRA Recovery	Monthly Bill \$ Change	Monthly Bill % Change	Monthly CCRA Recovery	Monthly Bill \$ Change	Monthly Bill % Change	Monthly CCRA Recovery	Monthly Bill \$ Change	Monthly Bill % Change
Residential	803	\$81.96	\$2.21	\$6.22	\$4.01	4.89%	\$4.37	\$2.16	2.64%	\$5.35	\$3.14	3.83%
Farm	2,139	\$203.53	\$5.88	\$16.56	\$10.68	5.25%	\$11.64	\$5.76	2.83%	\$14.25	\$8.37	4.11%
General Service	2,661	\$249.14	\$7.32	\$20.60	\$13.28	5.33%	\$14.48	\$7.16	2.87%	\$17.72	\$10.40	4.17%
Large General Service	105,065	\$8,089.67	\$288.93	\$813.20	\$524.27	6.48%	\$571.55	\$282.62	3.49%	\$699.73	\$410.80	5.07%
Irrigation	1,617	\$138.76	\$4.45	\$12.56	\$8.11	5.84%	\$8.80	\$4.35	3.13%	\$10.77	\$6.32	4.55%
Outdoor Lighting	80	\$12.32	\$0.22	\$0.62	\$0.40	3.25%	\$0.44	\$0.22	1.79%	\$0.53	\$0.31	2.52%
Municipal Pumping	3,119	\$240.38	\$8.58	\$24.14	\$15.56	6.47%	\$16.97	\$8.39	3.49%	\$20.77	\$12.19	5.07%
Water Heating Control	219	\$17.05	\$0.60	\$1.70	\$1.10	6.45%	\$1.19	\$0.59	3.46%	\$1.46	\$0.86	5.04%
Interruptible Load	1,838	\$99.14	\$5.05	\$14.23	\$9.18	9.26%	\$10.00	\$4.95	4.99%	\$12.24	\$7.19	7.25%
Deferred Load	1,423	\$79.20	\$3.91	\$11.01	\$7.10	8.96%	\$7.74	\$3.83	4.84%	\$9.48	\$5.57	7.03%

Note: Data comes from Exhibit 2 of Otter Tail's Petition. Data in the Petition comes from approved rates in Schedule-E, filed January 20, 2017 in compliance with ALJ's Order (Docket No. E017/GR-15-1033).

## **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  
Response Comments**

**Docket No. E017/M-17-246**

**Dated this 13<sup>th</sup> day of July 2017**

**/s/Sharon Ferguson**

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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