

March 8, 2019

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

PUBLIC DOCUMENT

RE: **PUBLIC Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket Nos. E017/GR-15-1033, Docket No. E,G999/CI-17-895

Dear Mr. Wolf:

Attached are the **PUBLIC Response Comments** of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

Joint Request by Otter Tail Power Company (Otter Tail or the Company) and the Minnesota Chamber of Commerce (the Chamber) to Reopen Order Approving Compliance Filing in Otter Tail's 2015 General Rate case.

The Joint Request was filed on March 30, 2018, with subsequent information filed on February 20, 2019. The petitioners were:

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496

and

Richard J. Savelkoul
Attorney on behalf of the Minnesota Chamber of Commerce
332 Minnesota Street, Suite W2750
St. Paul, MN 55101

The Department recommends that the Commission **approve** Otter Tail's request to redesign its Large General Service rate class rate design as presented in its January 3, 2019 *Reply Comments* except for a minor adjustment such that no rate group experiences a rate increase.

Daniel P. Wolf
March 8, 2019
Page 2

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

Sincerely,

/s/ ADAM J. HEINEN
Rates Analyst

AJH/ja
Attachment



Before the Minnesota Public Utilities Commission

Public Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket Nos. E017/GR-15-1033 and Docket No. E,G999/CI-17-895

I. BACKGROUND

On February 16, 2016, Otter Tail Power Company (Otter Tail or the Company) filed its 2015 general rate case in this docket. The Company proposed various changes to rates, rate design, and other regulatory items, and other parties in the rate case subsequently filed testimony responding to Otter Tail's proposals. Of particular relevance to the analysis in these response comments, Otter Tail and the Minnesota Chamber of Commerce (Chamber) entered into an agreement on October 14, 2016 regarding rate design for the Large General Service (LGS) rate class (LGS Agreement).¹ The LGS Agreement was based in large part on the Chamber's LGS rate design position presented in testimony. The LGS Agreement proposed moving rates closer to marginal costs, improving price signals for Time of Day (TOD) rate groups, maintaining consistency with the Company's overall rate design goals, and maintaining the relationship between TOD energy rates and Standby Service energy rates.

On May 1, 2017, the Minnesota Public Utilities Commission (Commission) issued its *Findings of Fact, Conclusions, and Order* (Order) in the 2015 general rate case. In this Order, the Commission approved, in relevant part to these response comments, the LGS rate design included in the LGS Agreement as the basis for setting rates for this rate class. On August 21, 2017, the Company filed its *Rate Case Compliance Filing* (Compliance Filing) detailing and implementing the Commission's changes set forth in its May 1, 2017 Order, including rate design changes for the LGS rate class. No issues were raised regarding the LGS rates presented in the Compliance Filing; final rates were implemented effective November 1, 2017.

On March 30, 2018, Otter Tail and the Chamber (Parties) filed a *Joint Request to Reopen Order Approving Compliance Filing* (Joint Request). In this Joint Request, the Parties notified the Commission of their concerns with implementation of final rates for the LGS rate class. Subsequent to implementation of final rates, the Company observed what it describes as "unintended and unreasonable effects that arose from incorporating the final-approved sales

¹ The Company incorrectly stated in its March 30, 2018 Joint Request that the LGS Agreement was filed on October 30, 2016.

and revenues in the LGS rates as part of Otter Tail's August 21, 2017 Compliance filing."² More specifically, the Joint Request states that the: "rates approved in the Compliance Order for the LGS class have resulted in significant and unintended bill increases for certain LGS customers that provide unintended and inappropriate signals for LGS customers to migrate away from TOD service and to change voltage levels."³ The Company stated: "these price signals are directly contrary to the intent and principles of the LGS Agreement and to rate design fundamentals."⁴ Otter Tail and the Chamber requested that the Commission reopen the Compliance Order and approve revised LGS rates so as to avoid the unintended bill increases for some LGS customers and align the LGS rate design with the principles of the LGS Agreement and rate design fundamentals.

The Minnesota Department of Commerce, Division of Energy Resources (Department) responded to the Joint Request on May 24, 2018, concluding that Otter Tail had not, at that time, met its burden of proof to show why the rates approved in the Company's most recent rate case must be changed. However, the Department noted that it remained open to considering further information from Otter Tail in *Reply Comments*, including:

- a detailed discussion of what, if any, harm has occurred, or may likely occur in the near future, because of current LGS rates;
- why the issues with current rates exist;
- how Otter Tail apportioned revenue responsibility within subclasses of the LGS class;
- how Otter Tail's proposed rates would result in better outcomes; and
- anything else Otter Tail believes will help the Company demonstrate that its proposal is reasonable.

The Company did not file anything further on this issue until January 3, 2019. There, the Company made a new proposal and attempted to respond to the areas of concern noted in the Department's *Comments*. Otter Tail proposed a new LGS rate design (different from the March 30, 2018 filing), in which the Company proposes to incorporate the rate design change with impacts of the Commission's December 5, 2018 *Order* in Docket No. E,G999/CI-17-895 (Tax Docket). Otter Tail explained that it proposed a combined solution because of various requirements in the Commission's Tax Docket Order.

The Department asked the Company for further information to support its new proposal. In response, Otter Tail filed additional information on February 20, 2019. The Department provides its response to the Company's reply and new rate design proposal below.

² Joint Request, page 1.

³ *Id.* at 2.

⁴ *Id.*

II. DEPARTMENT'S ANALYSIS OF OTTER TAIL'S COMMENTS

Otter Tail responded to the various areas of information identified above that the Department discussed in its *Comments*. The Department analyzes this information separately below.

A. WHY ISSUES WITH CURRENT RATES EXIST

In its *Reply Comments*, Otter Tail provided additional discussion explaining why the current issues exist with LGS rates. As to why the issues with the current rates exist, the Company explained that the issue exists because Otter Tail did not carefully examine the results of the Commission's decisions on the LGS Agreement between Otter Tail and the Chamber, in developing final rates in the rate case.⁵ Specifically, Otter Tail did not revisit the effects of approved sales and revenues on the LGS Agreement. The ensuing rate design resulted in the unexpected rate impacts and price signals identified by Otter Tail in its March 30, 2018 Joint Request. The Company regrets this oversight and has taken steps to prevent this issue from occurring in future filings.⁶

The Department appreciates Otter Tail's additional information. Based on this discussion, it is clear that the current rate design issue was an oversight on the part of the Company and the Chamber. However, the pertinent question before the Commission is whether this set of circumstances is an extraordinary issue that warrants reopening rates between general rate case filings.

B. APPORTIONMENT OF LGS RATE CLASS REVENUE RESPONSIBILITY

In its May 24, 2018 *Comments*, the Department expressed concern that Otter Tail failed to explain why it is reasonable to increase the apportionment of revenue responsibility for LGS TOD-Secondary and LGS TOD-Transmission customers compared to the rates in the Company's Rate Case Compliance filing.

In its January 3, 2019 *Reply Comments*, the Company explained that it worked closely with the Chamber to develop the proposed Joint Request intra-class revenue apportionment for the LGS rate class. Otter Tail stated that the starting point for its proposed revenue apportionment was

⁵ As noted previously in this proceeding, OTP stated that the cause of the difference in rates was that the LGS Agreement was based on the Company's originally proposed sales and present revenues, whereas the Commission ultimately approved different sales and revenues. However, as identified in the Department's May 24, 2018 *Comments*, the Commission approved sales for the LGS class as a whole, so Otter Tail did not explain why there were differing rate effects among sub-groups of the LGS class.

⁶ *Reply Comments*, Page 5.

the LGS Agreement, and the stated goals of moving rates closer to marginal cost and improving price signals, and maintaining marginal costs and principles of cost causation.

In addition, in the time since the Joint Request filed on March 30, 2018, the Company and the Chamber considered the impacts of the Tax Docket on LGS rate design. Through this analysis, the Parties determined that the currently approved LGS rate design meets the requirements set out in the Tax Docket Order; as such, the Company no longer requests the proposal in its March 30, 2018 filing, for two reasons.

First, the Tax Docket order explicitly directed the use of Otter Tail's current rate design, which implies that the revenue apportionment should be maintained between the LGS standard and LGS-TOD rate group categories. Second, the Company concluded that the \$4 million decrease in revenue requirements for the LGS class from the Tax Docket was sufficiently large "that it requires a redesign of rates." Thus, Otter Tail revised its rate design proposal in light of the Commission's Order in the Tax Docket.

C. OTTER TAIL REVISED PROPOSAL AND SUPERIORITY OF REVISED RATES

As noted above, Otter Tail revised its LGS rate design proposal between its Joint Request on March 30, 2018 and its *Reply Comments* filed on January 3, 2019. Otter Tail used the same rate design principles in each proposal; as such, its revised LGS rate design proposal relates to the impacts of the Commission's Order in the Tax Docket. The Company explained its rationale for modifying its rate design proposal to include the impacts of the Tax Docket.⁷ Otter Tail stated that the Commission's Tax Docket Order is clear that tax related refunds must be accounted for with approved rate design. Given its rate design concerns, the Company concluded that the LGS rate design proposal should be modified to include the impacts of the Tax Docket and to comply with the Commission's Tax Docket Order.

In its January 2019 *Reply Comments*, Otter Tail proposed a rate design that it believes would satisfy both the Tax Docket and the issues originally brought forth in the Joint Request. Otter Tail considered the following rate design guidelines when creating its new proposal (January 2019 Proposal):

- Continue to work with the Chamber for appropriate class rate design adjustments;
- Use rate case revenue allocations for the two rate class categories (LGS and LGS-TOD) as well as rate case billing determinants;
- Follow marginal cost structures across voltage levels;
- Strive for revenue neutrality across "like" voltage levels; and

⁷ *Reply Comments*, Pages 6-7.

- Make rate adjustments for the LGS and LGS-TOD rates first to demand, then to energy charges.⁸

The impact of the Company's January 2019 Proposal is presented in Table 1 below, which is a reproduction of a table provided in Otter Tail's Reply Comments.

Table 1: Comparison of Revenue Requirements between Current Rates and Otter Tail's January 2019 Proposal

Line No.	Rate/Schedule	Docket No.15-1033	TCJA Proposed	Difference	Percent Change
1	10.04 Large General Service - Secondary Service (Rate 603)	\$ 26,852,874	\$ 25,873,040	\$ (979,834)	-3.6489%
2	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,768,507	\$ 3,543,984	\$ (224,523)	-5.9579%
3	10.04 Large General Service - Transmission Service (Rate 632)	\$ 273,666	\$ 281,825	\$ 8,159	2.9814%
4	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,898,586	\$ 9,811,792	\$ (86,794)	-0.8768%
5	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 14,629,415	\$ 13,240,598	\$ (1,388,817)	-9.4933%
6	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,834,401	\$ 46,508,292	\$ (1,326,109)	-2.7723%
7	Total Large General Service:	\$ 103,257,449	\$ 99,259,531	\$ (3,997,918)	-3.8718%

Otter Tail explained that this revised rate design solution for the LGS rate class would result in better outcomes for ratepayers. In particular, the Company referenced three improvements with this proposal over current rates. First, the Company argued that the revised proposal would send appropriate price signals regarding conservation, which is consistent with state law, Commission policy, and the Department's rate design goals. Second, the proposed LGS rate design would reflect the Tax Docket revenue reductions and would be more equitable amongst LGS rate groups than the currently approved rate design. Third, the LGS rate design proposal would alleviate the billing issues in current rates discussed in the original Joint Request and in the Company's January 3, 2019 *Reply Comments*.

D. HARM TO LGS CUSTOMERS

As indicated in the Department's May 24, 2018 *Comments*, Otter Tail has the burden of proof to show why the rates approved in the Company's most recent rate case must be changed. While the Department concluded at that time that Otter Tail had not met its burden, the Department remained open to considering further information from Otter Tail in *Reply Comments*.

Otter Tail's *Reply Comments* repeated much of its earlier discussions and provided additional analysis to support its arguments that customers in the LGS Secondary and LGS-TOD Primary were negatively impacted and experienced an unintended over-recovery of LGS rate class revenues.⁹ The negative impacts are generally related to Otter Tail's conclusion that its current rate design does not align with the principles of the LGS Agreement and that certain LGS ratepayers are being assessed rates that are theoretically inconsistent and unreasonably high.

⁸ *Id.*

⁹ *Reply Comments*, Page 4 and Attachment 1 and Attachment 2.

The Company did not provide evidence in its *Reply Comments* that LGS customers have, at this time, changed service because of the current rate design. In addition, although the Department acknowledges the issues with the Company's current rate design, Otter Tail's argument does not take into account that certain LGS customers are benefitting from the current rate design. These benefits are from no fault of such customers and, in the event the rates are changed, the rates for these customers will increase. As such, it is necessary to weigh the level of harm between those customers currently charged higher rates and those currently charged lower rates.

In its *Reply Comments*, the Company provided calculations detailing the potential rate impacts to various LGS subgroups based on its March 2018 Joint Proposal and its January 2019 Proposal incorporating the Tax Docket Order.¹⁰ The Department reviewed these calculations and notes that the benefits to the **[TRADE SECRET DATA HAS BEEN EXCISED]**, when only changes in rate design are considered. However, the **[TRADE SECRET DATA HAS BEEN EXCISED]** to the other rate groups. When the tax changes are considered, the Department notes that all rate groups, with the exception of LGS-Transmission rate group, would see a decrease in rates compared to current rates.

The Department notes that Otter Tail did not provide, in its *Reply Comments*, rate impacts based on the currently approved rate design inclusive of changes associated strictly with the Tax Docket; as such, the Department was unable to quantify the impacts of the tax changes, in isolation, on the individual rate groups.¹¹ In an effort to estimate the impact of the Tax Docket on current rates, the Department issued discovery.¹² The Company provided its estimate of the effects of the Tax Docket on current rates in its response to Department Information Request No. 333. The impact of this calculation, and a comparison to Otter Tail's proposal in its *Reply Comments*, is presented in Table 2 below.

¹⁰ *Reply Comments*, Attachment 1 and Attachment 2.

¹¹ Department Attachment R-1.

¹² Department Attachment R-2.

Table 2: Impact of Tax Docket Changes on Otter Tail's Currently Approved LGS Rate Design

Line No.	Rate Schedule	Operating Revenues		Difference "A"	Percent Change
		Present	Proposed TCJA with LGS Correction		
1	10.04 Large General Service - Secondary Service (Rate 603)	\$ 26,852,874	\$ 25,873,040	\$ (979,834)	-3.6489%
2	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,768,507	\$ 3,543,984	\$ (224,523)	-5.9579%
3	10.04 Large General Service - Transmission Service (Rate 632)	\$ 273,666	\$ 281,825	\$ 8,159	2.9814%
4	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,898,586	\$ 9,811,792	\$ (86,794)	-0.8768%
5	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 14,629,415	\$ 13,240,598	\$ (1,388,817)	-9.4933%
6	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,834,401	\$ 46,508,292	\$ (1,326,109)	-2.7723%
7	Total Large General Service:	\$ 103,257,449	\$ 99,259,531	\$ (3,997,918)	-3.8718%
Line No.	Rate Schedule	Operating Revenues		Difference "B"	Percent Change
		Present	TCJA without LGS Correction		
8	10.04 Large General Service - Secondary Service (Rate 603)	\$ 26,852,874	\$ 25,813,184	\$ (1,039,690)	-3.8718%
9	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,768,507	\$ 3,622,598	\$ (145,909)	-3.8718%
10	10.04 Large General Service - Transmission Service (Rate 632)	\$ 273,666	\$ 263,070	\$ (10,596)	-3.8718%
11	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,898,586	\$ 9,515,333	\$ (383,253)	-3.8718%
12	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 14,629,415	\$ 14,062,993	\$ (566,422)	-3.8718%
13	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,834,401	\$ 45,982,349	\$ (1,852,052)	-3.8718%
14	Total Large General Service:	\$ 103,257,449	\$ 99,259,527	\$ (3,997,922)	-3.8718%

The Department reviewed the Company's revised proposal and discovery responses and provides the following discussion and conclusions.

First, on a rate group revenue basis, the Company's calculations provided in discovery suggest that maintaining the current rate design, with an across-the-board 3.8718 percent rate decrease, would be advantageous to most LGS customers, except those in the LGS-Primary and LGS-TOD Primary service rate groups, relative to the Company's revised rate design proposal filed in its *Reply Comments*.

Second, as originally discussed in the Department's May 24, 2018 *Comments*, the issue of harm is the primary focus when determining whether reopening rates is appropriate. Based on its review of Otter Tail's revised proposal, the Department remained unclear as to what quantifiable harm, at a rate class level, exists with the current rate design.

Third, Otter Tail did not provide evidence that these rate design issues have caused current customers to migrate between rate groups. Since the changes to LGS rate design are limited to the LGS rate class, the overall impact must be re-allocated amongst the various rate groups such that there is no impact to overall revenue apportionment. Given this fact, if the Company is unable to show that customers are switching service based on current rate rates, the issue of harm, in the Department's opinion, comes down to whether the prospect of customers changing service is real or if the rate design issue is likely to occur for an extended period. The Department expressed these concerns with Otter Tail and the Chamber during a conference

call¹³ and invited Otter Tail to provide any evidence it has to show that current customers have migrated, or intend to migrate rate groups.

On February 20, 2019, Otter Tail filed a *Letter* including correspondences from two LGS customers, American Crystal Sugar and Norbord. In these correspondence, both American Crystal Sugar and Norbord explained that they currently receive service under the **[TRADE SECRET DATA HAS BEEN EXCISED]** rate group and explained that they have received a rate increase that provides a significant financial incentive to move to the **[TRADE SECRET DATA HAS BEEN EXCISED]** rate group. The firms stated that they have not acted on these incentives because they understand that the issue will be corrected by the Joint Request.

Fourth, as shown in Table 2 above, the Company's revised proposal, absent the tax impacts, would lower rates for certain rate groups while also raising rates for other rate groups. Since Otter Tail provided evidence in its February 20, 2019 *Letter* that customers are considering a change in service as a result of the Company's current rate design, it is possible to estimate the potential harm of current LGS rate design relative to Otter Tail's revised proposal. Based on information provided by Otter Tail in response to informal discovery,¹⁴ American Crystal Sugar and Norbord accounted for **[TRADE SECRET DATA HAS BEEN EXCISED]** of total LGS rate class sales in 2018 and **[TRADE SECRET DATA HAS BEEN EXCISED]** of total LGS rate class sales included in the test year.¹⁵ The combined sales of these two customers represents of significant portion of total LGS rate classes sales, especially given that there are 521 customers in the LGS rate class.¹⁶ Given the level of sales associated with these customers, if they change service types, it could have an appreciable impact on overall recovery for the LGS rate class and may create additional rate design issues in future rate proceedings.

Although Otter Tail has not shown that LGS customers have changed rate groups, the information in the February 20, 2019 *Letter* suggests that some LGS customers may make such a change in the future. These potential customer migrations could create an issue in a future rate proceeding. The Department also notes that although the information in Table 2 above, which summarizes the impact of tax changes on the current rate design, suggests that the majority of LGS customers would see lower rates with the current rate design, applying this rate reduction would not remove the rate design issues originally identified in the Joint Request.

¹³ The conference call occurred on February 1, 2019.

¹⁴ **Trade Secret** Department Attachment R-3.

¹⁵ **Trade Secret** January 3, 2019 *Reply Comments*, Attachment 2.

¹⁶ Department Attachment R-2.

The rates for all LGS customers would be lower under the current rate design with lower tax levels;¹⁷ however, risks remain that certain customers could shift rate groups because of the current rate design.

Based on its review Otter Tail's revised rate design proposal and additional information, particularly in the February 20, 2019 *Letter*, the Department concludes that harm appears to exist with the Company's current LGS rate design. Although the Department is typically reluctant to reopen rates between rate cases, in particular for a single issue, the customer information in the Company's February 20, 2019 *Letter*, and sales data provided in response to informal discovery, suggests that there may be an appreciable risk that certain LGS customers would change service as a result of the current rate design. These changes in rate group may in turn have a detrimental effect in future rate cases.

The Department recommends that the Commission approve Otter Tail's revised rate design proposal presented in its January 3, 2019 *Reply Comments* with a minor adjustment. The Department notes that Otter Tail proposes a small increase in rates to the LGS-Standard Transmission rate group. To avoid a rate increase for any customer, the Department recommends that the Commission require Otter Tail to re-allocate the rate increase amongst other LGS rate groups such that the LGS-Standard Transmission rate group is held harmless by the Company's revised rate design proposal.

III. CONCLUSIONS AND RECOMMENDATIONS

The Department recommends that the Commission approve Otter Tail's revised rate design proposal presented in its January 3, 2019 *Reply Comments* with a minor adjustment. Specifically, the Department recommends that the Commission require Otter Tail to re-allocate the Tax Docket rate changes such that no rate group experiences a rate increase.

/ja

¹⁷ Department Attachment R-2.

From: [Prazak, David](#)
To: [Heinen, Adam \(COMM\)](#)
Cc: [Fedje, Svetlana](#)
Subject: RE: Otter Tails LGS Class rates (E017-GR-15-1033)
Date: Wednesday, January 16, 2019 2:18:20 PM
Attachments: [image001.png](#)
[image002.png](#)

Adam

Good afternoon (Brr!). We are open to a meeting if/when you think it would be useful.

You are not missing anything – we did not run a scenario keeping the current rate design and performing a “straight” reduction per the tax docket. We thought about it – but decided the starting point was flawed because the current rate design was flawed (described in our March 30th filing). We focused on taking the TCJA opportunity to return to our rate design principles and the agreement with the Chamber to redesign starting with the rate case revenue requirement (not the March 30th rate designs) then adjusting that revenue requirement by the TCJA to get to a solution that would take care of both the rate design compliance issue and the TCJA.

Let me know if this response isn’t satisfactory.

Dave

From: Heinen, Adam (COMM) <adam.heinen@state.mn.us>
Sent: Tuesday, January 15, 2019 4:12 PM
To: Prazak, David <DPrazak@otpc.com>
Cc: Fedje, Svetlana <sfedje@otpc.com>
Subject: RE: Otter Tails LGS Class rates (E017-GR-15-1033)

This is an **EXTERNAL** email. DO NOT open attachments or click links in suspicious email.

I don’t know if a meeting will be necessary at this point. Maybe I am missing something, but did OTP happen to run a scenario keeping the current rate design and reducing rates by the amount in the tax docket? I am just trying to make sure I have everything in front on me when doing my analysis. Thanks!

Adam Heinen
Public Utilities Rates Analyst
651-539-1825
mn.gov/commerce
Minnesota Department of Commerce
85 7th Place East, Suite 280 | Saint Paul, MN 55101

OTTER TAIL POWER COMPANY

Docket No: E017/GR-15-1033

Response to: Minnesota Department of Commerce

Analyst: Adam Heinen

Date Received: 01/23/2019

Date Due: 02/11/2019

Date of Response: 02/11/2019

Responding Witness: N/A

Information Request:

Topic: Large General Service Rates

Reference(s): January 3, 2019 Reply Comments

Please provide a rate design and rate group impact using the Company's currently approved LGS rate design updated to reflect the tax changes approved by the Commission in Docket No. E,G999/CI-17-895.

If this information has already been provided in testimony or in response to an earlier Department-DER information request, please identify the specific cite(s) or Department-DER information request number(s).

Attachments: 0

Response:

Otter Tail is providing a comparison of currently approved LGS class revenues for present, proposed TCJA with and without the proposed LGS correction. The rate class within the LGS class that shows material impact is LGS Time of Day – Primary Service. The impact calculation compared the difference between the revenue differences of the proposed TCJA with LGS correction and without the LGS correction. Our response also discusses mitigation of impact to other customers, when implementing this proposal.

See Table 1 below. The first part of the table (lines 1-7) represents OTPs proposed rate design including the LGS correction, as proposed in Otter Tail's January 3, 2019 Reply Comments in Docket E017-GR-15-1033. The second part of the table (lines 8-14) shows an adjustment to the present revenues for each LGS rate class, by the amount of the proposed TCJA reduction of 3.8718%, as provided in Otter Tail's TCJA Docket E,G999/CI-17-895. This approach provides a reasonable proxy to the adjusted revenues for this calculation. And in column "Impact A – B", as shown in red, the results indicate a material impact to the LGS Time of Day-Primary rate class,

with only six (6) customers/meters. The entire LGS rate class has over 520 customers (see last column on right).

Table 1

Approved Test Year 2016 Operating Revenue Summary Comparison - By Rate Schedule							
Line No.	Rate Schedule	Operating Revenues		Difference "A"	Percent Change		
		Present	Proposed TCJA with LGS Correction				
1	10.04 Large General Service - Secondary Service (Rate 603)	\$ 26,852,874	\$ 25,873,040	\$ (979,834)	-3.6489%		
2	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,768,507	\$ 3,543,984	\$ (224,523)	-5.9579%		
3	10.04 Large General Service - Transmission Service (Rate 632)	\$ 273,666	\$ 281,825	\$ 8,159	2.9814%		
4	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,898,586	\$ 9,811,792	\$ (86,794)	-0.8768%		
5	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 14,629,415	\$ 13,240,598	\$ (1,388,817)	-9.4933%		
6	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,834,401	\$ 46,508,292	\$ (1,326,109)	-2.7723%		
7	Total Large General Service:	\$ 103,257,449	\$ 99,259,531	\$ (3,997,918)	-3.8718%		
Line No.	Rate Schedule	Operating Revenues		Difference "B"	Percent Change	Impact "A" - "B"	Monthly Meter Count
		Present	TCJA without LGS Correction				
8	10.04 Large General Service - Secondary Service (Rate 603)	\$ 26,852,874	\$ 25,813,184	\$ (1,039,690)	-3.8718%	\$ 59,856	483
9	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,768,507	\$ 3,622,598	\$ (145,909)	-3.8718%	\$ (78,614)	10
10	10.04 Large General Service - Transmission Service (Rate 632)	\$ 273,666	\$ 263,070	\$ (10,596)	-3.8718%	\$ 18,755	1
11	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,898,586	\$ 9,515,333	\$ (383,253)	-3.8718%	\$ 296,459	14
12	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 14,629,415	\$ 14,062,993	\$ (566,422)	-3.8718%	\$ (822,395)	6
13	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,834,401	\$ 45,982,349	\$ (1,852,052)	-3.8718%	\$ 525,943	7
14	Total Large General Service:	\$ 103,257,449	\$ 99,259,527	\$ (3,997,922)	-3.8718%	\$ -	521

Otter Tail’s proposal for the TCJA with the LGS correction considers all customers in the class. In keeping with the rate design principles discussed in the filing, the demand charges were adjusted downward greater than 3.8718% to reduce the bill impacts of smaller customers. For example, if Otter Tail reduced the demand charges by the TCJA reduction of 3.8718%, a much larger percent reduction would have occurred for the energy charge in order to meet the TCJA revenue requirement (e.g. \$99,259,527). This incorrect design would have disproportionately shifted the collection of demand-related fixed costs to smaller customers.

NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE

Response to Information Request MN-DOC-01

Page 1 of 1

OTTER TAIL POWER COMPANY

Docket No: E017/GR-15-1033

Response to: Minnesota Department of Commerce

Analyst: Adam Heinen

Date Received: 02/21/2019

Date Due:

Date of Response: 02/22/2019

Responding Witness: David G. Prazak, Supervisor, Pricing & Tariff Administration - (218) 739-8595

Information Request:

Subject: Information Requests

Reference: N/A

What ACS and Norbord used, on a kWh basis, during 2018 and also what test year amounts were projected for these customers.

Attachments: 0

Response:

- a) The 2018 kWh sales for ACS [**PROTECTED DATA BEGINS.....PROTECTED DATA ENDS**] and Norbord [**PROTECTED DATA BEGINS.....PROTECTED DATA ENDS**]
- b) Otter Tail does not have individual test year projection amounts for these two customers, as they are included in the “overall class” projection.

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
Public Response Comments**

Docket No. E017/GR-15-1033 and E,G999/CI-17-895

Dated this 8th day of March 2019

/s/Sharon Ferguson

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
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Rate Case Inbox	Rate Case Inbox	mnrates@otpc.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_15-1033_Official Service List
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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