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February 12, 2020



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

**RE: In the Matter of the Distribution System Planning for Otter Tail Power Company  
Docket No. E017/M-19-693  
Reply Comments**

Dear Mr. Seuffert,

Otter Tail Power Company (Otter Tail) respectfully submits the following Reply Comments to Parties Comments in Docket E017/M-19-693; Otter Tail Power Company's 2019 Integrated Distribution Plan (IDP).

## **Overview**

Otter Tail agrees with the commenters that the first IDP is foundational in the process of starting a dialog between stakeholders regarding distribution planning and investments. The goal of the Otter Tail's first submittal was to provide an understanding of existing operational and planning processes and evolve subsequent submittals as necessary. The development of the IDP report is not a trivial task for utilities. Adjustments to the IDP and future direction should ensure the outcome of the report is providing commensurate value for customers.

## **Reply to the Comments of the Minnesota Department of Commerce (Department or DOC)**

As it was stated in their comments, "the Department's [of Commerce] position on distribution planning focused on three overarching themes: (1) distribution system planning should itself be cost-effective and lead to outcomes that are also cost-effective; (2) distribution system planning reporting should correct a historic, long-term information asymmetry between regulators and utilities; and (3) IDP requirements between utilities should be consistent to the greatest extent practicable." Otter Tail agrees with these positions

and appreciates the flexibility provided to each utility within their requirements as each utility in the state faces similar yet unique challenges to best serve their customers.

In addition, Otter Tail agrees with the Department's proposed recommendations A-D and amending IDP Requirement 3.D.2 plus merging IDP Requirements 3.D.1 and 3.D.2. For clarity, Otter Tail would be interested in understanding if there are any Grid Modernization projects that were not covered in Otter Tail's initial IDP that the Commission would like discussed. Further, an evaluation template to use for cost/benefit evaluations would provide value and consistency as well. A template could also include evaluation and weighting of reliability and non-quantified benefits in addition to any financial evaluations.

### **Reply to the comments of Clean Energy Economy MN (CEEM)**

Distributed Energy Resource (DER) scenarios will be a major discussion point in future IDPs. The DER scenarios within Otter Tail's IDP were based on historical DER deployments across Otter Tail's system as well as U.S. Energy Information Administration (EIA) data. Historical trends will increase at some point in the future which will provide both opportunities and challenges. Though not available for the 2019 IDP report, it's helpful to understand Otter Tail had a total of 3 DER installations in Minnesota in 2019 which is lower than other areas of the state. As noted in the IDP, Otter Tail's DER scenarios will look different than other utilities in the state for a variety of factors including customer demographics. The DER scenarios are an example where utility by utility variances are practical and appropriate within the IDP requirements.

As Otter Tail continues to develop and refine its long-term Grid Modernization plans, more information will be provided within subsequent filings. At the time of the initial report development, the information regarding the long-term Grid Modernization plan represented Otter Tail's most current vision and related information. As a general guiding principle, Otter Tail's grid modernization plan will ensure a system that is safe, reliable, affordable and responsive to our customers' needs and requests

Otter Tail can appreciate the desire for more stakeholder input into the development of the planning process, but it should be noted Otter Tail did meet the requirements for stakeholder input to the IDP. On September 13<sup>th</sup>, Otter Tail provided a public notice within docket No. E017/CI-18-253 of an in-person meeting with remote meeting capabilities to review the current state of distribution system planning in Otter Tail Power's service territory, and long-term considerations to integrate technology advancements such as distributed energy resources into the distribution grid. On October 4<sup>th</sup>, 2019, Otter Tail hosted the stakeholder meeting and provided the meeting presentation on October 10<sup>th</sup> within the docket.

### **Reply to the Comments of Rakon Energy**

Otter Tail understands the value and importance of leveraging the most current and up to date information such as electrical storage costs. Within our analysis we did leverage an RFI process to develop planning level storage costs for our application and believe the

numbers were appropriate for the analysis at the time. Otter Tail will certainly seek out the most current information for future analysis as well.

## **Reply to the Comments of the Minnesota Office of Attorney General (OAG)**

Finally, Otter Tail understands the approval of the IDP does not represent prudence as described by the Office of the Attorney General. Otter Tail expects prudence will be determined on a case by case basis. In the future, Otter Tail is open to requesting prudence of individual projects within the IDP. Otter Tail expects the prudence determination process to mirror the Integrated Resource Plan's process.

### **Conclusion**

Otter Tail looks forward to building off the foundational elements within the initial IDP to improve awareness and dialog surrounding distribution planning between Otter Tail, Stakeholders, Customers, and the Commission.

If you have any questions regarding this filing, please contact me at 218-739-8565 or at [mriewer@otpc.com](mailto:mriewer@otpc.com).

Sincerely,

*/s/ MICHAEL RIEWER*  
Michael Riewer  
Manager, Special Projects

kaw  
Enclosures  
By electronic filing  
c: Service List

## CERTIFICATE OF SERVICE

**RE: In the Matter of the Distribution System Planning for Otter Tail Power Company  
Docket No. E017/M-19-693**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert 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**

Dated this 12<sup>th</sup> day of February, 2020.

/s/ KIM WARD

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-693_M-19-693
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