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June 2, 2017

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

**RE: In the Matter of a Commission Inquiry into the Creation of a Commission  
Subcommittee under Minn. Stat. §216A.03, subd. 8.  
Docket No. E999-CI-17-284  
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits Reply Comments to the Minnesota Public Utilities Commission (Commission) in the above referenced matter.

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

If you have any questions regarding this filing, please contact me at 218-739-8956 or at [cstephenson@otpc.com](mailto:cstephenson@otpc.com).

Sincerely,

*/s/ CARY STEPHENSON*  
Cary Stephenson  
Associate General Counsel

kaw  
Enclosures  
By electronic filing  
c: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of a Commission  
Notice of Comment Period on Possible  
Distributed Generation Subcommittee  
under Minn. Stat. 216A.03, Subd. 8

Docket No. E999/CI-17-284

**Reply Comments of Otter Tail Power Company**

Otter Tail Power Company (Otter Tail) respectfully submits the following Reply Comments in response to the Minnesota Public Utilities Commission (Commission) April 17, 2017, Notice of Comment Period (Notice) in the above-referenced docket.

Otter Tail generally agrees with and supports the May 22, 2017 Comments filed by Dakota Electric. Otter Tail appreciates and understands the desire to address delays and to improve efficiency by the creation of a DG subcommittee. Like Dakota Electric, however, we question whether the proposed DG subcommittee would produce significant efficiencies compared to existing procedures. Otter Tail supports the idea of posting to the Commission's website a report summarizing distributed generation issues and how those issues have been resolved. As noted by Dakota Electric, this compilation could provide useful guidance and promote the prompt resolution of disputes without Commission involvement or a formal complaint.

Otter Tail also believes it would be useful to review best practices of utility commissions in high DG-penetration states before creating a DG subcommittee and dispute resolution process. While the statutory framework in other states will differ from the Commissions, there may be lessons and warnings to draw upon from other jurisdictions.

If the Commission were to go forward with the creation of a DG subcommittee, Otter Tail agrees with Xcel Energy's suggestion that the "Commission take an iterative, initially narrow approach by first limiting the scope of matter to a small number of clear defined issues."<sup>1</sup> As noted by Xcel the scope of the DG subcommittee could be limited to uncontested proceedings and follow the guidance of Minn. R. 7829.1050.

Otter Tail appreciates the opportunity to provide these Reply Comments. In sum, we do not support the creation of a DG subcommittee at this time. We believe additional review should be undertaken. Should the Commission elect to go forward with a DG subcommittee with delegated powers, we believe a narrow, step-by-step incremental approach is the best approach.

Respectfully submitted,

/s/CARY STEPHENSON

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June 2, 2017

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<sup>1</sup> Xcel Energy Comments, May 22, 2014, at p. 1

## **CERTIFICATE OF SERVICE**

**RE: In the Matter of a Commission Inquiry into the Creation of a Commission Subcommittee under Minn. Stat. §216A.03, subd. 8.  
Docket No. E999-CI-17-284**

I, Kim Ward, 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 list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Reply Comments**

Dated this 2<sup>nd</sup> day of **June, 2017**.

/s/ Kim Ward  
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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