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PO Box 496  
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September 14, 2017



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

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

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval of Continuing Business with Nalco Water, an Affiliated Interest of Otter Tail Power Company  
Docket No. E017/AI-17-  
Initial Filing**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of its ongoing business transacted with Nalco Water, which became an affiliate of Otter Tail long after a business relationship was established.

Portions of this filing contain Protected Data related to pricing and quantities of certain chemicals supplied to Otter Tail. Otter Tail has taken reasonable efforts to maintain the secrecy of such information, which derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the "Protected Data"). The Protected Data is therefore "trade secret information" and "nonpublic data" under Minn. Stat. § 13.37.

Otter Tail has electronically filed this document with the Commission. In compliance with Minn. R. 7829.1300, subp. 2, Otter Tail is serving a copy of this filing on the Minnesota Department of Commerce- Division of Energy Resources and the Minnesota Office of Attorney General-Antitrust and Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's general service list. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8657 or at [molsen@otpc.com](mailto:molsen@otpc.com).

Sincerely,

/s/ *MATTHEW OLSEN*  
Matthew Olsen, Manager  
Regulatory Proceedings & Compliance

jch  
Enclosures  
By electronic filing  
c: Service List

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

In the Matter of the Petition of Otter Tail  
Power Company for Approval of Continuing  
Business with Nalco Water, an Affiliated  
Interest of Otter Tail Power Company

Docket No. E017/AI-17-

**SUMMARY OF FILING**

Otter Tail Power Company (Otter Tail) hereby requests the Commission's approval of ongoing business transacted with Nalco Water, which, by its acquisition by Ecolab Inc., became an affiliate of Otter Tail as defined by Minn. Stat. § 216B.48 subd. 1, because five percent or more of Otter Tail's voting securities are owned by a person in the chain of successive ownership of five percent or more of Ecolab, Inc.

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

In the Matter of the Petition of Otter Tail  
Power Company for Approval of Continuing  
Business with Nalco Water, an Affiliated  
Interest of Otter Tail Power Company

Docket No. E017/AI-17-

**PETITION FOR APPROVAL  
OF AFFILIATED INTEREST  
TRANSACTIONS BETWEEN  
OTTER TAIL POWER COMPANY  
AND NALCO WATER, AN ECOLAB  
COMPANY**

**I. INTRODUCTION**

Pursuant to Minn. Stat. § 216B.48 and Minn. Rules 7825.1900 to 7825.2300, Otter Tail Power Company (Otter Tail) hereby files this Affiliated Interest Petition to obtain approval from the Minnesota Public Utilities Commission (Commission) to continue its long-standing and ongoing business arrangements with Nalco Water (Nalco).

Otter Tail has purchased water treatment chemicals and consultation services to optimize plant operations from Nalco since 1975 when the Big Stone Plant began operations (Otter Tail owns a 53.9 percent interest in the Big Stone Plant). In addition to Big Stone Plant, Otter Tail has purchased water treatment chemicals and consultation services from Nalco at Coyote Station (35 percent owned by Otter Tail) since 1995, at Hoot Lake Plant (owned by Otter Tail) since 1976 and at Solway Combustion Turbine (owned by Otter Tail) since 2003 when Solway began operations.

Otter Tail is requesting affiliated interest transaction approval of its ongoing business arrangements at this time, because it recently became aware that Nalco was acquired by Ecolab in 2011. Upon its acquisition by Ecolab, Nalco became an affiliated interest of Otter Tail under the statutory definition of “affiliated interest” contained in Minn. Stat. § 216B.48, Subd. 1, as follows:

- 1) Cascade Investments is an affiliated interest of Otter Tail because it owns more than five percent of Otter Tail’s voting securities;

- 2) Ecolab is an affiliated interest of Otter Tail because Cascade Investment, LLC owns more than five percent of the outstanding shares of both Otter Tail and Ecolab;
- 3) Nalco became an affiliated interest of Otter Tail in 2011, when it was acquired by Ecolab, because it became a link in a chain of successive ownership of five percent or more of voting securities, through Ecolab (acquired Nalco) and Cascade (owns more than five percent of Ecolab), and thus to Otter Tail (Cascade owns more than five percent of both Otter Tail and Ecolab). Otter Tail did not become immediately aware that Nalco was acquired by Ecolab because Nalco has continued to conduct its business under the Nalco name.

As explained in this Petition, Otter Tail's ongoing business arrangements with Nalco began many years before Nalco became an affiliated interest of Otter Tail, and Otter Tail has not changed the nature of its continuing relationship with Nalco since it became an affiliated interest. However, Otter Tail requests approval of the continuing relationship to ensure that it is in compliance with the above referenced affiliated interest statute as it continues its relationship with Nalco for water treatment chemicals and services.

Otter Tail requests this affiliated interest arrangement be approved as reasonable and consistent with the public interest.

## **II. SUMMARY OF FILING**

Pursuant to Minn. R. 7829.1300, Subp. 1, a one-paragraph summary of the filing accompanies this Petition.

## **III. GENERAL INFORMATION**

Pursuant to Minn. R. 7829.1300, Subp. 3, Otter Tail provides the following general information.

**A. Name, Address, and Telephone Number of Utility**

Otter Tail Power Company  
215 South Cascade Street  
P. O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8200

**B. Name, Address, Electronic Address and Telephone Number of Utility Attorney**

Bruce Gerhardson  
Otter Tail Power Company  
215 South Cascade Street  
P. O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8475  
bgerhardson@otpc.com

**C. Date of Filing and Proposed Effective Date of Rates**

The date of the filing is September 14, 2017. Otter Tail requests approval of the ongoing transactions be effective upon the Commission's decision.

**D. Statutes Controlling Schedule for processing the filing**

Minn. Stat. § 216B.48 and Minn. Rule 7825.2200 (B) govern the substantive criteria for the filing. These provisions do not establish an explicit time deadline for Commission action.

**E. Title of Utility Employee Responsible for Filing**

Matthew Olsen  
Manager, Regulatory Proceedings & Compliance  
Otter Tail Power Company  
215 South Cascade Street  
P. O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8657  
[molsen@otpc.com](mailto:molsen@otpc.com)

**F. Service List**

Otter Tail requests that the following persons be placed on the Commission’s official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail:

Matthew Olsen Manager, Reg. Proceedings & Compliance 215 South Cascade Street Fergus Falls, MN 56538-0496 (218) 739-8657 molsen@otpc.com	Bruce Gerhardson Director Reg. Affairs & Compliance 215 South Cascade Street Fergus Falls, MN 56538-0496 (218) 739-8475 bgerhardson@otpc.com
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**G. Service on other parties**

Pursuant to Minn. R. 7829.1300, Subp. 2, Otter Tail has served a copy of this Petition on the Minnesota Department of Commerce – Division of Energy Resources and the Antitrust & Utilities Division of the Minnesota Office of the Attorney General. A summary of the filing prepared in accordance with Minn. R. 7829.1300, Subp. 1 was served on all parties on Otter Tail's general service list.

**III. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

Otter Tail is an electric utility incorporated under the laws of Minnesota. Otter Tail sells electricity at retail in Minnesota, North Dakota and South Dakota.

Otter Tail is the sole owner of Solway Combustion Turbine, near Bemidji, MN. Otter Tail purchases chemicals, parts and other supplies for water treatment for Solway Combustion Turbine from Nalco.

Otter Tail is the sole owner of Hoot Lake Plant. Otter Tail leases equipment and purchases chemicals, parts and other supplies for water treatment for Hoot Lake Plant from Nalco.

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

Otter Tail is a co-owner of Coyote Station (35%) with Northern Municipal Power Agency (30%); Montana-Dakota Utilities Co. (25%) and NorthWestern Corporation (10%) (collectively the “Coyote Co-Owners”). The Coyote Co-Owners purchase chemicals, parts and other supplies for water treatment for Coyote Station from Nalco.

Otter Tail is a co-owner of Big Stone Plant (53.9%) with NorthWestern Energy (23.4%) and Montana-Dakota Utilities (22.7%) (collectively the “Big Stone Co-Owners”). The Big Stone Co-Owners lease equipment and purchase chemicals, parts and other supplies for water treatment for Big Stone Plant from Nalco.

Otter Tail and the respective plant co-owners have purchased water treatment chemicals from Nalco since 1975 when Big Stone Plant began operations. In addition to water treatment inputs, Nalco has also provided water treatment consultation services to optimize plant operation at Big Stone Plant, Coyote Station, Hoot Lake Plant and Solway Combustion Turbine for many years.

On December 1, 2011, Ecolab purchased Nalco as a wholly-owned subsidiary that continued doing business under the Nalco name. The consulting and supply relationships continued unchanged.

In 2011, Cascade Investment acquired more than five percent of the voting securities of Ecolab. Recently Otter Tail’s Sourcing Manager became aware that Nalco was owned by Ecolab, and knowing that Ecolab is currently an affiliated interest, he initiated this filing according to the statutory reporting requirements. For reference, below is a table showing the number of units of Otter Tail Corporation and Ecolab owned by Cascade Investment<sup>1</sup>. As depicted in Table 1, Cascade Investment’s shares with Otter Tail Corporation have not changed since prior to 2011 and their shares with Ecolab have not significantly changed since Ecolab’s merger with Nalco on December 1, 2011.

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<sup>1</sup> Cascade Investment’s shares and percent of class listed for Otter Tail Corporation is derived from Holding reports ran on NASDAQ Online however the shares and percent of class listed for Ecolab were taken from a data build pulled from S&P Capital IQ. Otter Tail maintains a subscription with both Nasdaq and S&P Capital IQ.

**Table 1 - Cascade Investment, LLC**

	<b>Otter Tail Corporation Shares</b>	<b>Otter Tail Corporation Percent of Class</b>	<b>Ecolab, Inc. Shares</b>	<b>Ecolab, Inc. Percent of Class</b>
2010	3,456,499	9.5%	0	0
2011	3,456,499	9.6%	9,421,467 – June	4.06% - June
			25,699,381 - Sept	11.07% - Sept
2012	3,456,499	9.6%	27,920,394	9.56%
2013	3,456,499	9.56%	27,920,394	9.43%
2014	3,456,499	9.51%	97,920,394	9.30%
2015	3,456,499	9.25%	27,920,394	9.38%
2016	3,456,499	9.10%	28,420,393	9.69%
2017	3,456,499	8.8%	28,420,393	9.8%

**IV. AFFILIATED INTEREST REQUIREMENTS**

Pursuant to the Order Initiating Repeal of Rule, Granting Generic Variance, and Clarifying Internal Operating Procedures in Docket No. E, G-999/CI-98-651 the following information is provided:

**A. A heading that identifies the type of transaction.**

See Caption above.

**B. The identity of the affiliated parties in the first sentence.**

See the Introduction of this Petition at page one.

**C. A general description of the nature and terms of the agreement, including the effective date of the contract or arrangement and the length of the contract or arrangement.**

The purchases of particular water treatment chemicals and additives are made by each plant as needed according to the needs of that plant on a monthly or periodic basis. These are single order purchases, not long-term commitments.



- D. A list and the past history of all current contracts or agreements between the utility and the affiliate, the consideration received by the affiliate for such contacts or agreements, and a summary of the relevant cost records related to these ongoing transactions.**

Table 2 below identifies a history of annual totals for Nalco invoices with Otter Tail since 2005, including amounts paid on behalf of the jointly owned plants (i.e. the amounts reflect not only Otter Tail's share of those costs; they also include the costs assigned to the other plant owners).

**Table 2 – Nalco Water Purchase Totals by Year  
(2005 – Second Quarter of 2017)**

**[PROTECTED DATA BEGINS...**

**...PROTECTED DATA ENDS]**

The foundation for the business relationship with Nalco and a substantial portion (over 90 percent) of the purchases of water treatment chemicals are for Otter Tail's jointly owned plants, Big Stone Plant and Coyote Station. While Otter Tail is the primary operator and owns the largest percentage share of these plants, the overall operating and maintenance budget is provided monthly and approved annually by the Engineering and Operating Committees for each plant, on which each owner has an equal vote. The budgets for these plants are subject to regular scrutiny and review by the plant co-owners. Applying Otter Tail's ownership shares to each of

the plants, Otter Tail is responsible for approximately half of the totals listed in Table 2 above and of that amount, more than 90 percent is approved by the co-owners of jointly owned plants.

**E. A descriptive summary of the pertinent facts and reasons why such contract or agreement is in the public interest.**

Water treatment is critical to plant operation. Impurities or chemical imbalances in boiler water will damage and corrode boiler steam tubes or build-up on the interior walls of the tubes, reducing the heating efficiency of the boiler. Damage or accumulated sediment on boiler tubes causes outages and additional wear and tear on the boiler, ultimately reducing life of the plant. Naturally occurring salts and organics in circulating cooling water also causes scaling, fouling and corrosion of heat exchanger tubes, resulting in lower efficiency and potentially damage to equipment. Providing the correct chemical and dosage is critical in maintaining reliable, efficient and cost-effective operation of the plant. Maintaining boiler and cooling water is a precise process requiring expertise specific to each plant and its unique operating characteristics.

Nalco has provided water treatment expertise at Big Stone Plant since it began operation in 1975. The Nalco technicians assigned to Otter Tail have built long-term relationships and expertise with Otter Tail's plants. They understand plant operations and characteristics so are able to tailor their expertise for Otter Tail's plants. Nalco has a track record of providing expertise to Otter Tail that has optimized water treatment to prevent water issues from causing degradation of plant performance.

Otter Tail has, at times through the tenure of Nalco's service, considered alternative providers of water treatment services. Several factors have resulted in Otter Tail's choice to continue with Nalco. After many years of doing business together, Otter Tail issued a Request for Proposals in 2000. As a result of the RFP process, Nalco was awarded the bid based on its competitive price and service quality. In addition to the RFP, Nalco's customer service for Otter Tail's plants has been outstanding. Nalco representatives have extensive industry experience and intimate knowledge of Otter Tail's plants developed over many years; this expertise and knowledge has been valuable and prevented the plants from incurring greater expenses in operating the boiler, circulating water system and other plant systems. If maintaining water chemistry in a steam plant is not performed well, significant additional maintenance expenses

may result. Nalco representatives offer the best expertise in the industry and this expertise has allowed the plants to avoid water-rated operating issues.

Since the last RFP was performed in 2000, Nalco prices have increased only modestly. Across nine products Otter Tail has procured from Nalco since 2001, the average compounded price increase has been only 1.2 percent. The cost of switching to another vendor would be substantial considering the time required to learn the intricacies of operating each individual plant and the changes in water treatment processes. Although Nalco, through its acquisition by Ecolab, became an affiliate of Otter Tail, the nature of the relationship and pricing agreements did not change.

In addition to long-standing, positive performance and competitive pricing, as mentioned above, more than 90 percent of the amount paid to Nalco is subject to the review and approval of co-owners of Otter Tail's jointly owned plants. The review and approval of co-owners (none of whom has an affiliate relationship with Nalco, Ecolab or Cascade) offers assurance that dealings with Nalco are appropriately vetted and managed. Nalco's performance and competitive pricing support that these transactions are in the public interest.

**F. The amount of the compensation and, if applicable a brief description of the cost allocation methodology or market information used to determine cost or price.**

The amount of the compensation for the years 2005 to the present is included in Table 2 above.

Nalco's price increases have remained reasonable compared to other chemicals purchased by Otter Tail. The competent support provided by Nalco's Service Consultant has helped Otter Tail manage these costs. Strategies recommended years ago have resulted in improved water quality and therefore less demand for chemical treatment.

Using the annual operating costs for Big Stone Plant as an example, Otter Tail's over-all plant costs are over \$70 million and the cost of Nalco chemicals average around \$380 thousand (0.54% of the total budget).

- G. If the service or good acquired from an affiliate is competitively available, an explanation must be included stating whether competitive bidding was used and, if it was used, a copy of the proposal or a summary must be included. If it is not competitively bid, an explanation must be included stating why bidding was not used.**

A competitive bidding process was used in the year 2000 at Coyote Station. One other vendor submitted a bid that was comparable in price. However, since that vendor lacked the long-term knowledge of the plant, the estimated quantities of chemicals to be consumed was less reliable than the bid of Nalco. There would also have been significant costs related to switching to a new water treatment process and fluctuations in chemical imbalances exposed the plant to operating risks. The bidding process provided a useful benchmark that Nalco pricing was in-line with industry standards for water treatment, and their knowledge of the plant and proven track record supported a decision to continue receiving products and services from Nalco. Early in 2017, Otter Tail again initiated a competitive bidding process at Coyote Station that is still underway. Coyote Station management will evaluate all aspects of the proposals when they are final.

- H. If the arrangement is in writing, a copy of that document must be attached.**

Attachment 1 is an example purchase order from Otter Tail for water treatment chemicals for Big Stone Plant.

- I. Whether, as a result of the affiliate transaction, the affiliate would have access to customer information, such as a customer name, address, usage or demographic information.**

Nalco will not have access to customer information, such as customer names, addresses, usage, or demographic information.

- J. The filing must be verified.**

See verification below.

**V. CONCLUSION**

Otter Tail respectfully requests Commission approval of the ongoing business transacted with Nalco, which became an affiliate of Otter Tail as defined by Minn. Stat. § 216B.48 subd. 1 long after the business relationship was established. This ongoing transaction between Otter Tail and Nalco is in the public's interest because the purchase and consulting transactions are performed at arm's-length and objectively vetted as described herein. The vast majority of these transactions are subject to the approval of Otter Tail's co-owner at jointly owned plants. Otter Tail has performed Requests for Proposals for these products and services during the tenure of this relationship and Nalco has prevailed. Nalco's employees have longstanding expertise specific to Otter Tail's plants derived from years of experience working together. For the foregoing reasons, Otter Tail respectfully requests the Commission's approval to continue transactions between Otter Tail and Nalco.

Dated: September 14, 2017

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: */s/ MATTHEW J. OLSEN*

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Matthew J. Olsen  
Manager, Regulatory Proceedings & Compliance  
Otter Tail Power Company  
215 South Cascade Street  
P. O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8657  
molsen@otpc.com



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

Enter this order number on all shipments, correspondence and invoices.

Order No.	Change Order	Order Date	Revised Date
47502	6	20-JAN-16	07-JAN-17



Page 1 of 2

SHIP TO: (unless indicated at item)  
 BIG STONE PLANT  
 48450 144TH STREET  
 Big Stone City, SD 57216  
 US

*Purchase Order*

NALCO COMPANY  
 ATTN: ROB KING  
 1132 PIONEER  
 BISMARCK, ND 58501  
 United States

Invoice to: BIG STONE PLANT  
 48450 144TH STREET  
 Big Stone City, SD 57216  
 US

Phone: 605-862-6300

EMAIL INVOICES AND ACKNOWLEDGE RECEIPT OF THIS ORDER VIA PHONE, FAX OR EMAIL ([sourcing@otpco.com](mailto:sourcing@otpco.com))

Buyer	Buyer Phone	Fax	Buyer Email	Revised By
C. KRAUSE	605-862-6311	605-862-6344	CKrause@otpco.com	
Payment Terms	Carrier		Shipping Terms	Freight
DD 30	BEST WAY		DESTINATION	Prepaid & Allowed

OTP expressly limits acceptance to the terms of this offer, including the attached OTP terms and conditions, unless a fully executed agreement is attached and referenced below.

change order #! line #10 additional tote CHANGE ORDER ADDITIONAL NALCO 1338 REQUIRED

Item	Description	Delivery By	Quantity	Per Unit	Total
1	<b>[PROTECTED DATA BEGINS...</b>				
1-1					
2					
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Enter this order number on all shipments, correspondence and invoices.

Order No.	Change Order	Order Date	Revised Date
47502	6	20-JAN-16	07-JAN-17



Page 2 of 2

Item	Description	Delivery By	Quantity	Per Unit	Total
9					
9-1					
10					
10-1					
11					
11-1					
12					
12-1					
13					
13-1					
****TOTAL COST****					

**...PROTECTED DATA ENDS]**

*Adam Koplin*

Adam Koplin, Plant Manager



## CERTIFICATE OF SERVICE

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval of Continuing Business with Nalco Water, an Affiliated Interest of Otter Tail Power Company  
Docket No. E017/AI-17-**

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 Letters of Availability to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company  
Initial Filing**

Dated: September 14, 2017

/s/ JANA C. HRDLICKA

Jana C. Hrdlicka  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8879

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Otter Tail Power Company_GEN_SL_Otter Tail Power Company_GENERAL SERVICE LIST