

August 2, 2013

Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: Comments of the Minnesota Department of Commerce, Division of Energy Resources;
Docket No. E017/M-13-609

Dear Dr. Haar:

Attached are the comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the following matter:

 Otter Tail Power Company's Request for Approval of a Revision to its Standby Service Tariff.

The petition was filed on July 19, 2013. The petitioner is:

 David G. Prazak
 Supervisor Pricing and Load Research
 Otter Tail Power Company
 215 South Cascade Street
 PO Box 496
 Fergus Falls, Minnesota 56538-0496

The Department recommends **approval**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ SUSAN L. PEIRCE
Rate Analyst

SLP/sm
Attachment

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

COMMENTS OF THE
MINNESOTA DEPARTMENT OF COMMERCE
DIVISION OF ENERGY RESOURCES

DOCKET NO. E017/M-13-609

I. SUMMARY OF THE FILING

On July 19, 2013, Otter Tail Power Company (OTP or the Company) filed a petition requesting approval to revise its Standby Service Tariff. Specifically, OTP proposes to increase the size of qualifying facilities excluded from standby service requirements from 40 kW to 100 kW to comply with revisions to Minn. Stat. §216B.164 made in the 2013 legislative session.

II. DEPARTMENT ANALYSIS

Minn. Stat. §216B.164 was amended, including the addition of subdivision 3a as follows (in part):

- (b) A public utility may not impose a standby charge on a net metered or qualifying facility:
 - (1) of 100 kilowatts or less capacity; or
 - (2) of more than 100 kilowatts capacity, except in accordance with an order of the commission establishing allowable costs to be recovered through standby charges.

OTP proposes to amend its Standby Service Tariff to increase the size at which it may not impose a standby charge from 40 kW to 100 kW consistent with the revisions to Minn. Stat. §216B.164.

The Company indicates it has no customers currently taking service under the Standby Service Tariff.

The Department finds the proposed revisions to be reasonable, and recommends approval.

III. DEPARTMENT RECOMMENDATION

The Department recommends approval of Otter Tail Power Company's proposed revisions to its Standby Service Tariff.

/sm

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
Comments**

Docket No. E017/M-13-609

Dated this 2nd day of **August, 2013**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_13-609_13-609
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_13-609_13-609
Michael	Bradley	bradley@moss-barnett.com	Moss & Barnett	4800 Wells Fargo Ctr 90 S 7th St Minneapolis, MN 55402-4129	Electronic Service	No	OFF_SL_13-609_13-609
Gary	Chesnut	gchesnut@agp.com	AG Processing Inc. a cooperative	12700 West Dodge Road PO Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_13-609_13-609
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_13-609_13-609
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_13-609_13-609
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-609_13-609
Burl W.	Haar	burl.haar@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_13-609_13-609
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_13-609_13-609
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_13-609_13-609
James D.	Larson	N/A	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Paper Service	No	OFF_SL_13-609_13-609

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_13-609_13-609
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_13-609_13-609
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_13-609_13-609
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_13-609_13-609
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Paper Service	No	OFF_SL_13-609_13-609
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_13-609_13-609