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April 17, 2024

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

RE: In the Matter of Otter Tail Power Company's 2022-2036 Integrated Resource Plan
Docket No. E017/RP-21-339
Reply Comments

Dear Mr. Seuffert:

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

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed. Please contact me at 218-739-8989 or njensen@otpco.com if you have any questions regarding this filing.

Sincerely,

/s/ NATHAN JENSEN
Nathan Jensen
Manager, Resource Planning

kaw
Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's 2022-2036 Integrated Resource Plan

Docket No. E017/RP-21-339

REPLY COMMENTS

I. INTRODUCTION & BACKGROUND

Otter Tail Power Company (Otter Tail or Company) submits to the Minnesota Public Utilities Commission (Commission) these Reply Comments responding to the Comments filed April 3, 2024, by the Clean Energy Organizations (CEOs) and the Office of the Attorney General – Residential Utilities Division (OAG).

Otter Tail's Comments and Reply Comments follow the Commission's January 4, 2024 hearing on Otter Tail's IRP filings, where the Commission directed the parties to further develop the record regarding Otter Tail's Minnesota Preferred Plan with AME, and to continue efforts toward a comprehensive settlement of the issues before the Commission.

On April 2, 2024, Otter Tail filed a comprehensive settlement agreement (Settlement Agreement) by and among the following parties: (1) Minnesota Department of Commerce, Division of Energy Resources; (2) International Union of Operating Engineers Local 49; (3) North Central States Regional Council of Carpenters; (4) Laborers' International Union of North America Minnesota and North Dakota; and (5) Otter Tail.

Otter Tail filed Comments on April 3, 2024, addressing the issues set forth in the Commission's January 18, 2024 Notice of Comment Period while noting the Company's full support for the Settlement Agreement. The Settlement Agreement addresses all the major issues before the Commission, including jurisdictional resource planning, the near-term status of Coyote Station, Otter Tail's proposed Astoria Station LNG Fuel Storage Project, the content of Otter Tail's next IRP, and Otter Tail's process for acquiring prudent, cost-effective projects for our customers.

The CEOs and OAG, who declined to join the Settlement Agreement, filed their Comments April 3, 2024. As noted herein, the record before the Commission supports the Settlement Agreement in all respects.

II. OTTER TAIL COMMENTS

A. The Commission Should Adopt the Comprehensive Settlement Agreement.

The Settlement Agreement is in the public interest. It reflects reasonable and workable compromises that promote the interests of Otter Tail's stakeholders, while providing the Company the ability to implement the clean energy transition envisioned by Minnesota policy. At the same time the Settlement Agreement prudently avoids irrevocable decisions and risk at a time when the planning environment is dynamic and uncertain.

The Commission considers the factors set forth in Minn. Rule 7843.0500 subpart 3 when evaluating integrated resource plans:

> Subp. 3. Factors to consider. In issuing its findings of fact and conclusions, the commission shall consider the characteristics of the available resource options and of the proposed plan as a whole. Resource options and resource plans must be evaluated on their ability to:
> A. maintain or improve the adequacy and reliability of utility service;
> B. keep the customers' bills and the utility's rates as low as practicable, given regulatory and other constraints;
> C. minimize adverse socioeconomic effects and adverse effects upon the environment;
> D. enhance the utility's ability to respond to changes in the financial, social, and technological factors affecting its operations; and
> E. limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors that the utility cannot control.

The Settlement Agreement is fully aligned with these factors. The Settlement Agreement promotes reliability through an AME designation for the Minnesota-allocated portion of Coyote Station, ensuring a key capacity resource for our Minnesota customers in the face of reliability concerns and planning uncertainty. Likewise the Settlement Agreement's support for the Astoria Station LNG Fuel Storage Project provides the plant the key MISO reliability attribute of fuel assurance; ensuring Astoria Station's ability to be dispatched when severe weather events disrupt pipeline delivered fuel.

The Settlement Agreement will also help keep our Minnesota customer's rates as low as practicable. The AME designation for Coyote Station reduces annual plant variable costs (primarily fuel and reagents) by $6.9 to $7.9 million for our Minnesota customers.

These savings will support the Minnesota renewable resource additions needed for compliance with Minnesota's recently enacted Carbon Free Standard (CFS).[1] The addition of fuel assurance at Astoria Station also provides our customers an important price hedge against volatility in energy markets and intraday pricing risk, substantially reducing the risk of rate spikes such as those recently experienced during Winter Storm Uri.

The Settlement Agreement limits adverse impacts on the environment by supporting Otter Tail's compliance with the CFS. The Settlement Agreement will help ensure Otter Tail's compliance with the CFS through the first milestone in 2030, while providing a strong base to meet subsequent milestones. Notably, approving the Settlement Agreement will result in the elimination of nearly all carbon emissions attributable to the Minnesota-allocated share of Coyote Station. The Settlement Agreement also supports Otter Tail's addition of significant renewable energy resources to be wholly allocated to Minesota, significantly reducing and potentially eliminating the need for Otter Tail to rely on renewable energy credits (RECs) for CFS compliance. These renewable resource additions would not be feasible but for the jurisdictional planning approach adopted in the Settlement Agreement.

The Settlement Agreement enhances Otter Tail's ability to respond to future developments and to mitigate the impact of matters outside the Company's control. It does so by preserving the Company's ability to adjust as the energy transition unfolds, and it does not foreclose any options – or require any irreversible decisions with respect to Coyote Station. The AME designation will continue to be evaluated in subsequent IRPs. As new technologies become available, or if the current uncertainties in the capacity markets and resource adequacy world are resolved, Otter Tail can adjust to these circumstances.

The Settlement Agreement is reasonable, sound, and prudent. It is the product of extensive good faith negotiations that involved all parties to this docket. Otter Tail encourages the Commission to adopt the Settlement Agreement as presented.

B. Response to CEO Comments.

1. The CEOs' Alternative Plan Is Imprudent, Rests on an Incomplete Analysis, and is Likely Infeasible.

The CEOs argue that replacing the Minnesota-allocated share of Coyote Station with a 75-megawatt battery in 2028 is cheaper than designating the Minnesota share of Coyote Station as an AME resource. The CEOs contend their alternative plan provides the same capacity benefits as Coyote Station with AME, and that their plan will meet Otter

[1] Minn. Stat. § 216B.1691, subd. 2g.

Tail's peak winter energy demands. Therefore the CEOs urge the Commission to reject jurisdictional resource planning and to require Otter Tail's withdrawal from the Minnesota-allocated portion of Coyote Station by 2028. The CEOs' position rests on flawed assumptions and a truncated, incomplete analysis. When fairly considered, the CEOs' alternative plan provides no material cost savings for Minnesota customers over Coyote Station with an AME designation, exposes Minnesota customers to unnecessary risks, and ignores the numerous benefits provided by designating Coyote Station as an AME resource.

a) The CEO's Analysis Provides an Incomplete Picture of an AME Designation for Coyote Station.

The CEOs' alternative plan rests largely on a PVRR analysis that purports to show it is less costly for Otter Tail to exit Coyote Station in 2028 than to designate the Minnesota-allocated portion for Coyote Station as an AME resource. The CEOs' analysis provides a limited picture of the value of an AME designation for Coyote Station and omits significant issues, including (1) future accreditation changes that may affect battery storage, (2) the difficulty, risk, and likely infeasibility of a 2028 withdrawal from Coyote Station, and (3) the benefits of an AME designation for Coyote Station.

Ultimately what the CEOs have identified in the CEOs' PVRR analysis is that the costs of Coyote Station as an AME resource are very similar to the CEOs' alternate plan. The PVRR analysis, however, is only a partial picture based on capacity expansion modeling. What this type of analysis does not consider is value – specifically the PVRR analysis does not account for the emergency value of Coyote Station with AME, especially for long duration emergency events more than four hours. The PVRR analysis omits the overall insurance value provided by Coyote Station with AME. There is likewise no assessment of risks avoided by using Coyote Station with AME as a bridge to a more certain planning environment. When the larger picture is examined, including the flaws in the CEOs' analysis, designating the Minnesota-allocated portion of Coyote Station as an AME resource is the prudent and cost-effective choice.

b) The CEOs' Battery Proposal Fails to Account for Likely Accreditation Changes and is Inadequate To Address Capacity Needs.

The CEOs' claim that replacing the Minnesota share of Coyote Station with 75 MW of battery storage will maintain or increase Otter Tail's winter season accredited capacity as compared to using Coyote Station as an AME resource. We disagree. The CEOs battery claims do not account for future MISO accreditation changes that are likely as more wind and solar come on-line. When these changes are considered, the CEOs' battery proposal falls short of what is necessary and prudent.

The CEOs' "direct loss of load" ("DLOL") battery storage capacity accreditation analysis rest upon MISO's class accreditation estimates[2] for the 2023-2024 Planning Year. MISO has also estimated how accreditation could change over time.[3] Figure 1 shows 2027 MISO accreditation estimates, and Figure 2 shows 2032 MISO accreditation estimates under both the current and proposed DLOL accreditation methodology based on MISO's Future 2A forecasted resource portfolios.

Figure 1
Future 2A DLOL breakdown by fuel class (5-years out)[4]

Future 2A 2027	Summer		Fall		Winter		Spring	
	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)
Gas**	88%	84%	88%	75%	86%	80%	87%	78%
Combined Cycle	91%	85%	91%	83%	87%	87%	90%	84%
Coal	91%	83%	90%	81%	90%	79%	90%	70%
Hydro	90%	92%	96%	92%	95%	75%	97%	80%
Nuclear	97%	91%	94%	93%	96%	90%	90%	87%
Flex Units***	89%	82%	84%	80%	80%	77%	84%	79%
Pumped Storage	97%	90%	94%	97%	85%	62%	92%	70%
Storage	100%	85%	100%	73%	100%	92%	100%	100%
Solar		9%		19%		1%		1%
Wind		11%		12%		17%		8%

2 See February 2024 MISO Resource Adequacy Subcommittee meeting: https://cdn.misoenergy.org/20240228%20RASC%20Item%2005a%20Accreditation%20Presentation%20RASC-2020-4%202019-2631885.pdf
3 See January 2024 MISO Resource Adequacy Subcommittee meeting: https://cdn.misoenergy.org/20240117%20RASC%20Item%2007a%20Accreditation%20Presentation%20(RASC-2020-4%20and%202019-2631379.pdf; See also 3 MISO System Attributes Roadmap: https://cdn.misoenergy.org/2023%20Attributes%20Roadmap631174.pdf
4 MISO Resource Adequacy Subcommittee meeting, January 17, 2024, Slide 21: https://cdn.misoenergy.org/20240117%20RASC%20Item%2007a%20Accreditation%20Presentation%20(RASC-2020-4%20and%202019-2631379.pdf

Figure 2
Future 2A DLOL breakdown by fuel class (10-years out)[5]

Future 2A 2032	Summer		Fall		Winter		Spring	
	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)	UCAP*	DLOL (Base)
Gas**	88%	84%	87%	75%	86%	82%	87%	78%
Combined Cycle	91%	85%	90%	83%	87%	77%	90%	84%
Coal	95%	83%	94%	81%	94%	79%	95%	69%
Hydro	94%	90%	95%	90%	94%	75%	96%	79%
Nuclear	92%	91%	94%	93%	96%	90%	90%	87%
Flex Units***	89%	70%	84%	73%	80%	77%	83%	74%
Pumped Storage	97%	78%	94%	95%	85%	35%	92%	68%
Storage	100%	89%	100%	96%	100%	56%	100%	72%
Solar		4%		11%		2%		1%
Wind		7%		14%		14%		9%

Figure 1 and Figure 2 both show estimated winter accreditation values for storage of 92 percent and 56 percent in 2027 and 2032 under DLOL, respectively. Based on these numbers, battery storage may have a higher winter accreditation initially, but over time it is forecasted to decrease significantly. The MISO Attributes Roadmap Technical Appendix states that "Storage DLOLs result in lower values for spring and winter for 2032, as longer duration expected unserved energy events occur which limit the assumed 4-hour ability to fully charge and discharge across the duration of events."[6]

Based on MISO projections, replacing the capacity provided by Coyote Sation with AME will require (1) more battery storage capacity or (2) a longer duration battery than the 4-hour 75 MW battery proposed by the CEOs. In either case there is significant additional expense for Otter Tail customers not considered by the CEOs' analysis. For example, in 2032, to maintain the 68 MW of DLOL Winter accreditation the CEOs calculated in their reply comments, approximately 125 MW of battery storage would need to be installed, significantly higher than the 75 MW proposed by the CEOs. It also must be recognized that battery storage accreditation could decline further after 2032 as more intermittent renewable generation is added and expected unserved energy events are deeper and longer in duration.

[5] MISO Resource Adequacy Subcommittee meeting, January 17, 2024, Slide 22: https://cdn.misoenergy.org/20240117%20RASC%20Item%2007a%20Accreditation%20Presentation%20(RASC-2020-4%20and%202019-2631379.pdf

[6] MISO System Attributes Technical Appendix: https://cdn.misoenergy.org/2023%20Attributes%20Technical%20Appendix631176.pdf

Table 1 below underscores the risk of replacing an AME-designated Coyote Station – a fuel assured dispatchable resource, with battery storage -- a resource that has significant accreditation and cost uncertainty. Using the CEOs modeling inputs, the CEOs' alternative plan with 125 MW of battery storage results in a $37.5 million higher NPVRR than that of the CEOs' Alternative Plan proposal of 75 MW and $14.7 million higher NPVRR compared to an AME-designated Coyote Station as shown in Table 1 below. The CEOs' alternative plan could become even more expensive if storage accreditation declines further than the levels currently projected by MISO.

Table 1
Present Value of Revenue Requirements

	4/3 CEO Comments Modeling Assumptions
OTP Preferred Plan With AME	$1,446,232
Alternative CEO Plan With 75 MW Battery	$1,423,420
125 MW Battery	$1,460,966

Otter Tail recognizes that these are projections by MISO, but the significant volatility shown in battery storage accreditation in the Winter season when Otter Tail has its highest capacity requirements supports an AME designation for the Minnesota share of Coyote Station. Maintaining Coyote Station as an AME resource for Minnesota customers will provide accreditation and cost certainty during a time of transition for MISO accreditation methodology. It also heeds the warnings from MISO, FERC, and other organizations about the rapid pace of baseload thermal unit retirements and the potential negative consequences for grid stability and reliability. An AME-designation for Coyote Station allows for future resource planning flexibility as MISO's resource class accreditation levels are refined and battery technology matures. This cautious approach is more prudent than focusing on a resource with uncertain capacity accreditation and performance in severe winter conditions.

To be clear, the foregoing analysis of the likely future of MISO battery accreditation is provided to point out foundational problems in the CEOs' alternative plan. It should not be construed as Otter Tail promoting AME at Coyote Station as a long-term solution; AME at Coyote Station is a means to address uncertainties and complexities in the current planning environment. Similarly, the foregoing battery accreditation analysis should be construed as opposition to battery storage.[7] Otter Tail believes that this technology has significant potential in certain applications, and we anticipate examining battery storage in our next IRP. That said, the technology is still emerging and there are significant questions to be resolved as this nascent technology is deployed, including cost, accreditation, and operational characteristics of a battery in an existing generation portfolio. In this context we favor a measured, deliberative approach. The CEOs' alternative plan is not such an approach.

c) The CEOs Analysis Assumes that a 2028 Withdrawal from Coyote Station is Feasible and Without Significant Risk or Cost.

The CEOs assert that the most prudent course of action is to require Otter Tail to withdraw from the Minnesota-allocated portion of Coyote Station by 2028 and to replace the plant's capacity with a battery resource. The CEOs have referenced Otter Tail's Initial IRP Filing in this context, wherein Otter Tail sought authority to completely withdraw from Coyote Station by year-end 2028. That initial position, however, was premised and contingent on having the support for such action from all our jurisdictions. Moreover, as we explained in our March 31, 2023 Supplemental IRP filing the uncertain planning environment supports a more cautious approach – one where Otter Tail continues to participate in Coyote Station until such time as the Company is required to make a material, non-routine capital investment in the plant.

As noted, the CEOs appear to limit their withdrawal recommendation to the Minnesota-allocated portion of the plant. Even if withdrawal is limited to the Minnesota-allocated portion of Coyote Station, completing such action by 2028 is likely infeasible; at best such a withdrawal is complex and carries significant risks.[8] Withdrawal as recommended by the CEOs would presumably require (1) the transfer or sale of Otter Tail's ownership interest (the Minnesota share of the plant) to one or more of our co-owners, or (2) transfer of the Minnesota-allocated portion of the plant to our North Dakota jurisdiction. The former requires one or more willing co-owners and consent of third-party lenders, and the compelled nature of the transaction could result in unfavorable terms where Otter Tail and its Minnesota customers may be required to retain significant

[7] We included a 25 MW battery proposal in the 2031-32 timeframe in our Supplement IRP filing. *See* Otter Tail Supplemental IRP, March 31, 2023, p. 7, Table 3-1. In our December 15, 2023, Supplemental Filing we proposed to remove the battery in our Supplement IRP filing proposed because the capacity at this time is no longer viewed as necessary considering the available capacity provided by Coyote Station under the AME designation.

[8] We described many of the complexities and risks of withdrawal in our Initial IRP filing. OTP Initial IRP filing, September 1, 2021, pp. 43-35. While that filing discussed withdrawal in full, the same complexities and risks would apply to a partial withdrawal.

liabilities and risk.[9] The CEOs have not accounted for these costs and risk in their analysis. The latter approach requires consent and approval of the North Dakota Public Service Commission, which is not assured, and the terms of such a transfer are to be determined. In either scenario, Otter Tail does not have a unilateral ability to withdraw.

The only device by which Otter Tail can unilaterally withdraw from Coyote Station is through termination of the plant ownership agreement on five years advance written notice. We have noted this provision in past IRP filings, explaining this device contemplates the orderly wind down of plant operations and completion of reclamation obligations.[10] In this respect the CEOs appear to seek an order that would have the intent and effect of closing a co-owned, multi-jurisdictional plant located in another state. Such an overly expansive, irreversible mechanism is difficult to justify when our jurisdictions are not in alignment on Otter Tail's continued participation in Coyote Station. A Commission order that directly or indirectly requires such action may invite interjurisdictional disputes and legal challenges.

In sum, exiting the Minnesota-allocated share of Coyote Station by 2028 is likely infeasible, and at the very least complex with significant risks left unaddressed by the CEOs' limited analysis. There is no compelling reason to pursue this path given the many benefits from designating the Minnesota-allocated share of the plant as an AME resource.

d) The CEOs do not Account for the Benefits of an AME Designation for the Minnesota-allocated Portion of Coyote Station.

The CEOs' analysis fails to account for the numerous benefits to be derived from designating the Minnesota-allocated portion of Coyote Station as an AME resource. This includes significant carbon emission reductions that are unlikely available under any other scenario for Coyote Station, and immediate and material reductions in variable operating costs.

Carbon Emission Reductions

An AME designation for the Minnesota allocated portion of Coyote Station will produce a significant reduction in carbon emissions of approximately 400,000 tons annually. The CEOs' analysis fails to fully account for these emission reductions. In fact the CEOs claim that Otter Tail has overstated the amount of greenhouse gas reductions that will be achieved from offering its Minnesota share of Coyote Station as an AME resource. This is not the case. Otter Tail's estimate of carbon emission reductions is

[9] These risks include commercial risks and jurisdictional conflict risks noted in our April 3, 2024 Comments at p. 24. Commercial risks include the potential for litigation involving our co-owners and the mine operators.

[10] We have also noted that the wind down of operations and subsequent dissolution of the plant does not terminate the obligations under the lignite sales agreement (LSA).

reasonably accurate.[11] In contrast, the CEOs' estimate significantly understates the amount of carbon reductions expected from operating Coyote Station as an AME resource and overlooks the likelihood that without an AME designation there will be no reductions in carbon emissions at Coyote Station.

The CEOs assume that operating Coyote Station as an AME resource will only result in output reductions when the total plant is operating above 357 MWs. This is not accurate. Otter Tail's share of Coyote Station is modeled independently in the MISO generation dispatch model, meaning AME will provide energy and greenhouse gas emission reductions *anytime* MISO dispatches OTP Coyote above its North and South Dakota share of roughly 80 MW.

Looking at the historical real time generation of Otter Tail's share of Coyote Station for the same years analyzed by the CEOs[12], Otter Tail calculates that AME would have resulted in an average reduction in generation of 314,651 MWh, significantly more than the 224,907 MWhs claimed by the CEOs. A reduction in generation of 314,651 MWhs equates to a reduction in carbon emissions of approximately 385,500 tons – very close to Otter Tail's estimate of 400,000 tons of reduced carbon emissions attributable to an AME designation for Coyote Sation.[13] The actual amount will depend on future energy market prices and MISO system-wide energy needs. That said, the record reflects that Otter Tail's estimate of approximately 400,000 tons of reduced carbon emissions is reasonable.

The precise amount of greenhouse gas emission reductions from an AME-designation for Coyote Station can be debated. What cannot be disputed is that an AME designation for Coyote Station will reduce energy generation and greenhouse gas emissions from Coyote Station on behalf of Minnesota customers to near zero, and no other jurisdiction or co-owner can dispatch Otter Tail's Minnesota share of 70 MW once it is designated as an AME resource. Moreover, if the Minnesota allocated portion of Coyote Station is not designated as an AME resource, the energy and greenhouse gas emissions attributed to that 70 MW will be reflective of the projected capacity factor of Otter Tail's total share of Coyote Station, which is 65 percent.

The CEOs also miss the larger point that in any other scenario for Coyote Station there is likely to be no reduction in carbon emissions – and potentially an increase in emissions. In the sale or transfer of Otter Tail's Minnesota-allocated portion of the plant, the plant owners (which may include Otter Tail) will be able dispatch the plant's full

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[11] Otter Tail's projections were based on a 70 MW resource being dispatched at 65% capacity factor – a necessarily simplified approach that does not attempt to account for the many unique dispatch characteristics of a co-owned unit in multiple RTOs.

[12] For reference see CEOs Comments, Table 6.

[13] Using Coyote Station's average carbon emission rate of 1.225 tons per MWh, an annual reduction in output of 314,651 MWhs would result in a reduction of 385,447 tons of carbon emissions.

capacity without any constraints. This is also true if the Minnesota-allocated portion of the plant were assumed by our North Dakota jurisdiction. In sum, an AME designation for Coyote Station provides material reductions in the plant's carbon emissions.

Immediate and Significant Reduction in Fuel Costs

The CEOs' analysis does not account for the reduction in fuel and related costs that our Minnesota customers will experience when Otter Tail operates the Minnesota-allocated portion of Coyote Station as an AME resource. The record demonstrates that an AME designation for Coyote Station will reduce variable plant costs (primarily fuel and reagents) for our Minnesota customers by $6.9 to $7.9 million annually. These figures are substantial, particularly for a small utility like Otter Tail.

The CEOs have sought to offset this benefit by emphasizing that as an AME resource the Minnesota-allocated portion of Coyote Station will be infrequently dispatched by MISO, resulting in the loss of energy market revenue in coming years. This too provides a truncated view of an AME designation for Coyote Station, not accounting for the benefits of having a fuel-assured dispatchable resource available for our Minnesota customers. Moreover, as noted by the CEOs their analysis does not account for non-operational costs (such as depreciation) that when considered auger in favor utilizing the plant to essentially obtain value for expenses that would be paid in any circumstance.

It is also reasonable to note the incongruity of the CEOs' position on anticipated lost energy market revenue as a basis to deny an AME designation for the Minnesota-allocated portion of Coyote Station. In doing so the CEOs appear to acknowledge that Coyote Station produces beneficial energy market revenues for our Minnesota customers, whereas in other contexts members of the CEOs have supported the OAG's production cost loss analysis for Coyote Station, where the OAG has argued Otter Tail should withdraw from Coyote Station, in part, because of inadequate energy market revenues.[14]

[14] In the docket entitled *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities* No. E999/CI-19-704, the Sierra Club and the OAG assessed Coyote Station through a production cost loss analysis which purports to show market revenues were inconsequential in relation to production costs. *See e.g*. OAG Reply Comments, June 1, 2021, Docket No. E999/CI-19-704. Otter Tail has consistently rejected this analysis, pointing out that a production cost loss analysis is simply a measure of how well a particular plant can respond to changing energy markets, and that is not a reasonable or appropriate measure of a plant's value. If it were, only peaking plants could be justified under this analysis. *See e.g*. Otter Tail Response Comments, June 15, 2021, pp. 2-5. Docket No. E999/CI-19-704.

Other Benefits of an AME designation

What we said before regarding the many benefits of an AME designation for Coyote Station holds true today:

> …AME is anticipated to be a valuable tool for Otter Tail, until it withdraws from Coyote Station or the plant is retired, as it undertakes to plan its system on a bifurcated basis because it will allow the Company to plan for the Minnesota-specific share of Coyote Station with increased optionality. AME at Coyote Station will allow the Company to retain Coyote Station's capacity, thereby providing an important reliability benefit, and will help the Company ensure that it remains compliant with market monitoring regulations and its contractual obligations to the co-owners of Coyote Station. With respect to reliability, Coyote Station helps Otter Tail, as a winter-peaking system, mitigate substantial risk resulting from volatility in weather patterns, changes to MISO capacity accreditation standards, increased load on the Otter Tail system, capacity deficits across the industry and MISO in particular, and increased renewables onto the grid with the passage of the IRA. In other words, it provides capacity and an energy hedge in the face of serious reliability concerns.[15]

To add to this, an AME designation at Coyote Station provides a cost-effective tool that allows Otter Tail to support Minnesota energy policy as reflected by the CFS in a way that respects the differing views of the jurisdictions we serve. It allows Otter Tail to respond to significant uncertainty in the current planning environment – whether accreditation methodology changes, finalization of federal environmental rules, or new planning reserve margin requirements, while not foreclosing or requiring any future disposition of Otter Tail's participation in Coyote Station. It avoids unnecessary commercial and jurisdictional conflict and risk until such time when such risks may be moot or at least less significant. An AME designation for Coyote Station also paves the path to invest in renewables on behalf of Minnesota customers without exacerbating reliability concerns by exiting fuel assured resources too aggressively.

[15] Otter Tail Supplemental Filing, December 15, 2023, pp. 5-6.

2. The Comprehensive Settlement Agreement Addresses Many of the Issues Raised by CEOs.

If the Commission approves Otter Tail's Minnesota Preferred Plan with AME, the CEOs urge the Commission to adopt several conditions with such approval.[16] Notably, the Settlement Agreement already addresses many of the CEOs' concerns. For example the CEOs recommend that the Commission require Otter Tail to designate Coyote Station as an AME resource as soon as feasible. Under the Settlement Agreement, Otter Tail may designate the Minnesota share of Coyote Station as an AME resource as early as March 1, 2026.[17] The CEOs also seek a requirement that Otter Tail start planning for possible withdrawal from Coyote Station by the end of 2031.[18] Under the Settlement Agreement Otter Tail will include in its next IRP a plan that assumes an exit from the Minnesota share of Coyote Station by 2031. The Settlement Agreement also addresses the CEOs' concerns about a material, non-routine capital investment at the plant. The Settlement Agreement requires Otter Tail to annually file with the Commission a list of all capital projects with a total plant cost over $30 million. This provides transparency and insight into Coyote Station capital projects. The Settlement Agreement also provides that Otter Tail will make a changed circumstances filing should a situation arise where it is required to make a material non-routine capital investment in the plant.[19]

Finally, the CEOs' concern regarding a potential fatal flaw in the Coyote Station AME approach is also addressed in correspondence from MISO attached as Exhibit 2 to Otter Tail's April 3, 2024 Comments. As noted therein MISO has confirmed that a Commission order limiting the dispatch of the Minnesota-allocated portion of Coyote Station will satisfy the MISO tariff concerning AME resources. This support goes far to address the CEOs concerns about a fatal flaw. In short, the Settlement Agreement reasonably addresses concerns raised by the CEOs.

[16] The CEOs seek an order with the following conditions: (1) requiring that Otter Tail seek pre-approval for any large non-routine capital expense at Coyote Station; (2) conditioning approval of AME on agreement from Otter Tail to refund Minnesota customers any payments for AME later found to be unjust or unreasonable (3) requiring reporting on the AME fatal flaw analysis and adopting a fallback plan; (4) ordering that AME start as soon as feasible, at least seasonally; and (5) requiring that Otter Tail begin planning now for resources to replace Coyote Station by the end of 2031 at the latest. CEO Comments p. 37.

[17] Comprehensive Settlement Agreement paragraph 1(a).

[18] "Otter Tail will file its next Minnesota IRP no later than May 15, 2026 in which Otter Tail will develop a plan which assumes Otter Tail will withdraw from the Minnesota share of Coyote Station as of December 31, 2031; provided that Otter Tail may present additional plans for consideration based on a comprehensive resource planning analysis." Comprehensive Settlement Agreement paragraph 8.

[19] Comprehensive Settlement Agreement, paragraph 2.

C. Response to OAG Comments

1. The OAG's Positions are Flawed and not in the Public Interest.

The OAG's financial analysis of designating Coyote Station as an AME resource is not reasonable. Moreover the OAG's proposals for conditioning any approval of the Astoria Station LNG Fuel Storage Project are unworkable, inconsistent with Minnesota law, and unnecessary.

a) The OAG's Claim that Designating the Minnesota Portion of Coyote Station as an AME Resource Results in Immaterial Savings is Incorrect.

The OAG's analysis of the costs of designating the Minnesota portion of Coyote Station as an AME resource include several assertions that are difficult to square, or that otherwise appear doubtful, or lack support from the record.

OAG contends that cost savings for Minnesota customers are minimal at best, in part because Minnesota customers will continue to pay for certain fixed costs of Coyote Station. For example, the OAG claims that "[b]ecause Otter Tail proposes to continue recovering 100 percent of Coyote's fixed cost, the AME proposal would only avoid about $6.9 to 7.9 million per year in variable fuel and reagents, or less than three percent of the plant's annual revenue requirements in 2029."[20]

The fixed costs that Minnesota customers would pay for Coyote Station under an AME designation are the costs necessary to maintain and operate the plant as an AME resource. Beyond that point the OAG is correct that the projected annual reduction in variable costs from an AME designation range from $6.9 to $7.9 million per year. The OAG is incorrect to suggest the reduction in variable costs and associated savings for our Minnesota customers is immaterial. They are significant especially for a utility of Otter Tail's size. The avoided variable costs are significantly more than three percent of the plant's annual revenue requirement as claimed by the OAG. A reduction in variable costs of $6.9 to $7.9 million is approximately a 25 percent reduction in the plant's annual revenue requirement.

The OAG's cost per MWh analysis is similarly flawed.[21] Comparing Coyote Station without AME and Coyote Station with AME to derive a cost per MWh provides little insight. The former is a capacity and energy resource, whereas the latter is a capacity and emergency resource. The comparison of Coyote Station with AME to other operating plants is also unhelpful because this comparison does not account for sunk costs. Moreover this analysis does not factor in a major benefit of Coyote Station with AME,

[20] OAG Comments, April 3, 2024, pp. 3-4.
[21] Id. pp. 4-5.

which is that our Minnesota customers obtain a cost-effective peaking resource that provides Otter Tail significant flexibility to respond to changes in the planning environment.

The OAG also appears to suggest that the Company impeded the OAG's analysis by declining to provide the capacity expansion modeling requested in OAG IR 47.[22] The OAG's description of Otter Tail's response did not include Otter Tail's explanation concerning the burden of the OAG's information request, specifically that the OAG's request would require 132 individual modeling runs, requiring significant staff computing resources, and that simply compiling the raw data sought by the OAG would take four to six weeks, with additional time necessary to review and vet the results for accuracy.[23] For context, the scope of the modeling sought by the OAG was roughly equivalent to the modeling performed in Otter Tail's Initial IRP filing, and significantly more than the modeling Otter Tail performed for its Supplemental IRP filing. Moreover Otter Tail explained the information sought by the OAG was largely redundant to what Otter Tail has already provided.

b) The OAG's Proposals Concerning Cost Recovery for the Astoria Station LNG Fuel Storage Project Are Neither Reasonable Nor Necessary.

The OAG acknowledges that the Astoria Station LNG Fuel Storage Project has some reliability and price hedging benefits.[24] The OAG takes issues with the project's costs and risks, which according to the OAG merit significant conditions on any approval the Commission may grant. The conditions sought by the OAG include a Commission statement making clear that Otter Tail is at risk for future recovery of the project should circumstances require the plant's closure before the end of its depreciable life. The OAG also argues for an asymmetrical hard cap on project recovery that the OAG suggests will incentivize Otter Tail to complete the project under budget. The OAG recommendations are unreasonable and unnecessary and should not be adopted by the Commission.

[22] "More specifically, the OAG asked Otter Tail to provide the net present value of revenue requirements and societal costs (NPVRR and NPVSC) for the three proposals under each of the future scenarios, or "sensitivities," that Otter Tail modeled in its March 2023 supplemental preferred plan (designated A–U). ....Otter Tail objected to the OAG's request on the basis that the burden of preparing a response would outweigh the benefits to the case. Otter Tail limited its response in two ways: First, the Company declined to analyze a 2028 exit on the grounds that "the Company does not propose such action." Second, the Company did not provide any sensitivity analyses. It provided just a single set of NPVRR and NPVSC for the AME proposal and its supplemental preferred plan." OAG Comments, April 3, 2024, pp. 6-7.
[23] *See* OTP Response to OAG IR 47.
[24] OAG Comments, April 3, 2024, p. 8.

The OAG's request that the Commission condition approval of the Astoria Station LNG Fuel Storage Project on Otter Tail being at risk for future recovery after the project is put into service is effectively a request to (1) eliminate or significantly limit the rebuttable presumption of prudency that normally attaches to projects approved in an IRP order,[25] and (2) inappropriately incorporate a hind-sight prudency analysis to the project.[26] Neither approach is warranted.

The OAG speculates that future EPA regulation could require natural gas peaking plants to invest in pollution controls that could in some cases force plants to close. There are any number of future developments that could affect existing natural gas plants; the future remains uncertain, particularly in the mid to long term. In contrast, the record before the Commission demonstrates LNG fuel storage at Astoria Station is prudent for the reasons we have detailed in our prior filings. The prudency of the project was recently bolstered by MISO's proposal to increase the VOLL (Value of Lost Load) from \$3,500/MWh to \$10,000/MWh.[27] This proposed change would greatly increase the financial risk faced by generation units that are unable to perform during extreme events. The Astoria Station LNG Fuel Storage Project will not eliminate all market risk,

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[25] Minn. Stat. 216.2422 Subd. 2 (b) provides that "[i]n the resource plan proceedings of all other utilities, the commission's order shall be advisory and the order's findings and conclusions shall constitute prima facie evidence which may be rebutted by substantial evidence in all other proceedings. With respect to utilities other than those defined in section [216B.02, subdivision 4](), the commission shall consider the filing requirements and decisions in any comparable proceedings in another jurisdiction."

[26] Judging the prudence of investments in hindsight, is not consistent with well-established law. *Duquesne Light Co. v. Barasch,* 488 U.S. 299, 309 (1989) ("Under the prudent investment rule, the utility is compensated for all prudent investments at their actual cost when made (their 'historical' cost), irrespective of whether individual investments are deemed necessary or beneficial in hindsight."); *City of New Orleans v. FERC*, 67 F.3d 947, 954 (D.C. Cir. 1995) ("The petitioners correctly point out that a prudence analysis must evaluate a utility's decision on the basis of information available to the utility at the time the decision is made. Neither FERC nor this court can properly use hindsight in evaluating the reasonableness of a decision's effect on rates."); *Violet v. FERC*, 800 F.2d 280, 282 (1st Cir. 1986) ("In an industry that combines long lead times for plant construction with wide fluctuations in supply and demand, constant changes in the regulatory environment, and unpredictability in the availability and price of alternative sources of fuel, some projects that seem prudent at the time when costs are incurred may appear, some years later, in hindsight, to have been unnecessary or inadvisable. The prudence of the investment must be judged by what a utility's management knew, or could have known, at the time the costs were incurred."); *New England Power Co*., 31 F.E.R.C. P 61,047, at 61,084 (1985) ("[O]ur task is to review the prudence of the utility's actions and the costs resulting therefrom based on the particular circumstances existing either at the time the challenged costs were actually incurred, or the time the utility became committed to incur those expenses."); *In the Matter of the Petition of Xcel Northern States Power Company d/b/a Xcel Energy to Recover February 2021 Natural Gas Costs* ; *In the Matter of a Commission Investigation into the Impact of Severe Weather in February 2021 on Impacted Minnesota Natural Gas Utilities and Customers*, Dkt. No. G-002/CI-21-610 & Dkt. No. G-999/CI-21-135, 2022 MINN. PUC LEXIS 266, *8 (Oct. 19, 2022) ("Generally, prudence is reasonable action taken in good faith based on knowledge available at the time of the action or decision. Actions taken in good faith are those taken without malicious intent, exercising the care that a reasonable person would exercise under the same circumstances at the time the decision was made. Prudence is not evaluated using the benefit of hindsight.")

[27] MISO has indicated they plan to file updated tariff language reflecting this change with FERC in Q3/Q4 of this year. https://cdn.misoenergy.org/20240229%20MSC%20Item%2005%20Scarcity%20Pricing%20Update%20(MSC-2019-1)631901.pdf

but these are prudent costs to bare on behalf of OTP customers to minimize the depth and duration of exposure to the increasing VOLL prices.

Otter Tail understands and appreciates that circumstances can change, and that it always carries the burden in rate recovery matters. Further Otter Tail appreciates that the Commission is investigating issues related to early retirement of certain generation plants, and that there are many factors to consider in rate making for such facilities. However, it is an altogether different matter to condition the approval of a project with the explicit risk of non-recovery should future circumstances limit the life of a resource; a resource that would have up to that point been deemed prudent and used and useful for rate making purposes. Utilities need reasonable assurance of recovery when projects are approved. If approval and rate recovery came with significant caveats dependent on future events few projects could ever proceed.

The OAG's hard cap proposal is unreasonable and unworkable. Assuming for analysis that Otter Tail put the Astoria Station LNG Fuel Storage Project into service below the project cost approved by the Commission (i.e. under budget), Otter Tail would have no basis to seek recovery for project costs it did not incur, and there would be no savings for Otter Tail to retain or distribute to customers. Otter Tail's customers would receive the full benefit of the under-budget cost from the fact there would be fewer project costs to recover. On the other hand, if project costs exceed the hard cap, Otter Tail would not have the ability to demonstrate to the Commission that those costs, while more than the initial projected cost, are nevertheless necessary and prudent, as would be the case in if a soft cap was in place.[28] There is no basis to adopt the hard cap proposed by the OAG.

2. Otter Tail's Competitive, Flexible Acquisition Process Results in Prudent, Cost-Effective Projects and Otter Tail Should Continue to Use this Process.

The OAG's Comments acknowledge Otter Tail's commitment to use competitive bids for the major components of the Astoria Station LNG Fuel Storage Project.[29] The OAG recommends that the Astoria Station LNG Fuel Storage Project also utilize an independent auditor, and that for future projects Otter Tail be required to adopt the competitive bidding process recommended by the Department in prior comments, including the use of independent auditors.

The Settlement Agreement, paragraph 9, specifically addresses the application of Otter Tail's flexible competitive procurement process to future projects:

[28] The Company has indicated it has no objections to the traditional soft cap. See Otter Tail Comments, April 3, 2024, p. 18. This approach is in line with past Commission practice and past Otter Tail projects.
[29] OAG Comments, April 3, 2024, pp. 13-14.

> Otter Tail's current resource project selection process results in selection of prudent projects. However, to ensure greater transparency into Otter Tail's resource selection process, Otter Tail will provide in its renewable resource eligibility filings a full narrative description and financial analysis demonstrating that the project selected was competitively superior to other alternatives available to the Company. The Company and DOC shall jointly develop relevant data points and fields for this analysis.[30]

As reflected in the Settlement Agreement, Otter Tail's competitive, flexible acquisition process works. The Settlement Agreement adds greater transparency into Otter Tail's process by requiring more detailed financial data and narrative descriptions. Considering these improvements, we do not believe independent auditors add value to the process. Moreover, Otter Tail's application of its process will certainly be evaluated in any rate recovery docket through information requests. Independent auditors and the RFP and bidding procedures recommended by the OAG are better suited to large utilities that have many projects to evaluate at a regular cadence. Otter Tail's small size means it has far fewer projects to evaluate. In this context being flexible and nimble allows Otter Tail to take advantage of opportunities as they arise, which is essential for a small utility with limited market presence. The Commission should support the Settlement Agreement provision on Otter Tail's project selection process.

III. CONCLUSION

Based on the forgoing, Otter Tail respectfully requests that the Commission issue an order approving without modifications the Settlement Agreement filed on April 2, 2024.

[30] Comprehensive Settlement Agreement, paragraph 9.

Dated: April 17, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

Sincerely,

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CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's 2022-2036 Resource Plan Docket No. E017/RP-21-339

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 **17th** day of **April, 2024**.

<u>*/s/ KIM WARD*</u>

Kim Ward
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