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May 9, 2014



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

**RE: In the Matter of the Investigation into Environmental and Socioeconomic Costs
Under Minn. Stat. §216B.2422, Subd. 3
Docket No. E999/CI-00-1636
Comments**

Dear Dr. Haar:

Otter Tail Power Company (Otter Tail) hereby submits its Comments to be considered by the Agencies to the Minnesota Public Utilities Commission (Commission) as described in the Department's "Discussion Document," which was filed in this matter on April 17, 2014.

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

If you have any questions regarding this filing, please contact me at (218) 739-8417 or at bhdraxten@otpc.com.

Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

wao
Enclosures
By electronic filing
c: Service Lists

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

In the Matter of the Investigation into
Environmental and Socioeconomic Costs
Under Minn. Stat. §216B.2422, Subd. 3

Docket No. E999/CI-00-1636

**OTTER TAIL POWER COMPANY'S
COMMENTS**

On April 24, 2013, the Minnesota Department of Commerce (Department) and the Minnesota Pollution Control Agency (MPCA) hosted a Stakeholder Meeting in compliance with the Commission's February 10, 2014, ORDER REOPENING INVESTIGATION AND CONVENING STAKEHOLDER GROUP TO PROVIDE RECOMMENDATIONS FOR CONTESTED CASE PROCEEDINGS, in the above-captioned matter (Order). Specifically, Ordering paragraph 2 of the Order says:

“The Commission requests that Department and the Pollution Control Agency convene a stakeholder group to address the scope of the investigation, whether to retain an expert under Minn. Stat. § 216B.62, subd. 8, and the possible role of an expert, should one be retained.” (Order page 5).

The Order indicates that after the Minnesota Public Utilities Commission (Commission) receives the stakeholder group's recommendations the Commission will refer the matter to the Office of Administrative Hearings for a contested proceeding. These Comments respond to the Department's "Discussion Document," which was filed in this matter on April 17, 2014.

The scope of the proceeding:

The only issue as to the scope of the proceeding appears to be whether to investigate the costs of methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF₆), in addition to the emissions that were expressly identified for evaluation in the Commission's February 10, 2014 Order. Since the amount of these specific greenhouse gasses produced in electric generation are so small when compared to CO₂, Otter Tail Power Company (Otter Tail) recommends that they not be included in this study.

The Department's proposed "Process Scenarios":

The Department's Discussion Document describes several process scenarios for which it requested comment. The purpose of commenting on those process scenarios is not clear, however. The process scenarios address the *depth* of the investigation that the Department is considering to support its positions in the forthcoming contested proceeding (as opposed to the *breadth* of the investigation). Presumably, each party to the forthcoming contested proceeding will endeavor to support its position through expert testimony and other evidence. Ultimately, the credibility and persuasiveness of each party's case will depend largely on the depth and credibility of the record that is created to support its position. Otter Tail does not, therefore, believe it is appropriate to comment on the depth of the factual support that another parties may choose to present in this case. Each party should pursue the scenario (or any other approach) it deems appropriate to create a record adequate to support its position.

Outside Expert:

Before responding to the question of whether an expert should be hired, Otter Tail notes that it has some confusion as to what question is being asked: Is the question whether the Commission should hire an expert or whether the Department should hire an expert? While Otter Tail's view is that an expert should not be hired either by the Commission or by the Department, the explanation for that position differs depending upon which question is being asked. Obviously, what an expert's role would be would differ quite significantly depending upon what is being considered here.

A contested proceeding is about to commence, and the purpose of that proceeding is to create a record from which the Commission can decide important factual issues. The parties will therefore bring into those proceedings the factual support that they see fit to support their positions, including presumably testimony from expert witnesses. Therefore, there is no role for a Commission expert to play, either procedurally or substantively. Instead, the Commission should allow the proceeding to commence and parties to develop the record as each of them sees fit.

If the question is whether the Department should hire an expert, then the question is whether such an expert is required for the purpose of developing the record in this case—and the answer to that question is that developing the record does not require the hiring of a Department expert. There are several parties already in this case and they are all in a position to develop the

factual record as they see fit. We expect the record will be robust. The parties have very different perspectives and they will bring to bear the evidence and factual support, including expert testimony, that they feel is appropriate to support their distinct perspectives. With such a case ahead of us, there is no need for a separate Department expert. Furthermore, if the idea is for the Department to engage some kind of neutral arbiter of the factual record or to hire some expert that all parties can agree to, Otter Tail does not think that either possible or appropriate. These widely varying positions would not make it possible to choose an outside expert that all parties will agree on and it would not be appropriate for the Commission to defer its judgment to a third-party expert, especially on such important matters. For these reasons, the State Agencies should not hire an outside expert. Instead, individual parties should hire their own outside experts as they see fit.

With respect to process going forward, it is important to address how the case is going to be commenced once referred to the Office of Administrative Hearings. Given that the matter is proceeding on the Motion of the Clean Energy Organizations, the case should commence with the filing of their Direct Testimony and the case should progress from there.

Dated: May 9, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

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OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

**RE: In the Matter of the Investigation into Environmental and Socioeconomic Costs
Under Minn. Stat. §216B.2422, Subd. 3
Docket No. E999/CI-00-1636**

I, Wendi Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service lists by electronic service or by first class mail.

**Otter Tail Power Company
Comments**

Dated this **9th** day of **May 2014**.

/s/ WENDI OLSON

Wendi Olson
Regulatory Filing Coordinator
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Minnesota Docket No. E999/CI-00-1636
Interested Party Service List

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