

July 11, 2025

Mike Bull
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **Comments of the Minnesota Department of Commerce**
Docket No. E017/M-25-30

Dear Mr. Bull:

Attached are the comments of the Minnesota Department of Commerce (Department) in the following matter:

Otter Tail Power Company's 2024 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2025.

Otter Tail Power Company (Otter Tail, OTP, or the Company) filed the Petition on April 1, 2025.

The Department:

- Recommends the Minnesota Public Utilities Commission (Commission) **accept** Otter Tail's 2024 Safety and Service Quality Reports.
- Will provide a recommendation on OTP's Annual Service Reliability Report after reviewing the Company's future Supplemental Filing on Institute of Electrical and Electronic Engineers (IEEE) 2024 Benchmarking data that Otter Tail will file later in 2025.
- Recommends setting the benchmarking of OTP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP's statewide system against IEEE's medium-sized utilities' data and OTP's work centers against IEEE's small-sized utilities' data.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

LB/JK/ad
Attachment

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Acronyms and Abbreviations

AMI	Advanced Metering Infrastructure
ANSI	American National Standards Institute
CAIDI	Customer Average Interruption Duration Index
CAO	Consumer Affairs Office (of the Public Utilities Commission)
CELI	Customers Experiencing Lengthy Interruptions
CEMI	Customers Experiencing Multiple Interruptions
CSR	Cold Weather Rule
CWR	Customer Service Representative
EI	Edison Electric Institute
EIA	U.S. Energy Information Administration
FLISR	Fault Location Isolation and Service Restoration
GIS	Geographic Information System
Grid Mod	Grid Modernization
IDP	Integrated Distribution Plan
IEEE	Institute of Electric and Electronics Engineers
MAIFI	Momentary Average Interruption Frequency Index
OMS	Outage Management System
OSHA	United States Occupational Safety and Health Administration
OSHD	Occupational Safety and Health Division of Minnesota Department of Labor and Industry
OTP	Otter Tail Power Company
PUC	Public Utilities Commission
SAIDI	System Average Interruption Duration Index
SAIFI	System Average Interruption Frequency Index
SRSQ	Safety, Reliability, and Service Quality



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-30

I. INTRODUCTION

On April 1, 2025, Otter Tail Power Company (Otter Tail, OTP, or the Company) filed its 2024 Annual Safety, Reliability and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E017/M-25-30 in compliance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826. 0400, 7826.500 subp. 1, 7826.0600 subp. 1, and 7826.1300.

II. PROCEDURAL BACKGROUND

April 1, 2025	Otter Tail filed its 2024 SRSQ Report.
April 30, 2025	The Commission issued a notice of comment period for the Petition.
June 10, 2025	Otter Tail filed a Supplemental Filing to its 2024 SRSQ Report.

Topics open for comment that are relevant to OTP:

- Should the Commission accept the Electric Utilities' 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?
- Should the Commission consider a transition to an alternative approach in the reliability standards for Otter Tail Power based on the utility's discussion of IEEE reporting issues and EIA 861 data?
- Are there other issues or concerns related to this matter?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.¹

III. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Department reviewed OTP's Annual Report to assess compliance with [Minnesota Rules, Chapter 7826](#) and Commission Orders. The Department used information from past annual reports to inform identification of issues and trends regarding OTP's performance.

¹ Commission's Notice of Comment Period, April 30, 2025, (eDockets: [20254-218387-01](#)) (hereinafter "Commission's notice").

The Department provides:

- Responses to the notice topics;
- A summary of the Department’s review of OTP’s 2024 Safety, Reliability, and Service Quality Reports;
- A discussion of the Company’s reliability standards for 2025; and
- A discussion of the Company’s compliance with other Commission Orders.

A. *RESPONSE TO NOTICE TOPICS*

1. *Should the Commission accept OTP’s 2024 Annual Safety, Reliability, and Service Quality (SRSQ) Reports?*

The Department recommends that the Commission accept OTP’s 2024 Safety and Service Quality Report. Otter Tail has provided all the required information, and the 2024 report is consistent with its 10-year average. OTP provides explanations when the data deviate from the expected average.

OTP will be supplementing its petition in the fall of 2025 with the results of IEEE’s 2024 performance year benchmarking results.² The Department plans to file supplemental comments after the supplemental filing is received and will provide a recommendation on the Reliability Report at that time.

2. *Should the Commission consider a transition to an alternative approach in the reliability standards for OTP based on the utility’s discussion of IEEE reporting issues and EIA 861 data?*

The Department recommends that the Commission consider transitioning to an alternative approach for evaluating reliability standards for OTP based on the utility’s discussion of IEEE reporting challenges and EIA Form 861 data. In the current Petition, OTP provides limited historical data, and the discussion remained at a high level. The Department believes that utilizing a five-year average of IEEE data, with a one-year reporting lag, would provide greater detail and allow for more informed conclusions. Additionally, this approach could eliminate the need for a supplemental filing later in the year. Minnesota Power has proposed a similar alternative in their current SRSQ Report. In Information Request (IR) 008, the Department asked OTP whether they would consider adopting this method for their 2025 filing. OTP responded that, while their preferred approach would be to use the Edison Electric Institute’s (EEI) annual Reliability Survey Report, they are open to using a five-year IEEE average if the Department finds it beneficial.³

3. *Are there other issues or concerns related to this matter?*

The Department does not have any additional concerns .

² Petition at 3.

³ Department Attachment 1, OTP Response to Department IR No.8.

B. ANNUAL SAFETY REPORT

The annual safety report consists of two parts in accordance with Minnesota Rules 7826.0400:

- A. A summary of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and
- B. A description of all incidents during the calendar year in which an injury requiring medical attention of property damage resulting in compensation occurred as a result of downed wires or other electrical system failures and all remedial action taken because of any injuries or property damage described.

B.1. Department Review

The following tables are a compilation of OTP’s summaries filed with OSHA and OSHD for the last ten years.

Table 1: Case Data from Reports filed with OSHA and OSHD (2015 – 2024)

	Number of Deaths	Number of Cases			Number of Days	
		with Days Away from Work	with Job Transfer or Restriction	Other Recordable Cases	Job Transfer or Restriction	Away from Work
2015	0	3	7	17	349	90
2016	0	3	1	8	240	10
2017	0	1	1	10	41	11
2018	0	1	2	14	152	6
2019	0	3	3	4	239	60
2020	0	2	6	1	451	17
2021	0	1	3	10	214	33
2022	0	4	1	7	9	41
2023	0	3	2	4	190	49
2024 ⁴	0	1	2	8	49	4
10-Year Average	0	2.2	2.8	8.3	193.4	32.1
Variance	0	-1.2	-0.8	-0.3	-144.4	-28.1

Source: Minnesota Department of Commerce

Table 1 shows that the number of cases with days away from work, job transfers or restrictions have been stable over the last ten years while other recordable cases have fluctuated. The Company has not experienced any reportable deaths in the last ten years.

⁴ Petition at 9.

The Department notes that the 2024 number of days involving job transfer or restriction represents a significant decrease compared to 2023. OTP also reported one of its lowest average days away from work over the past 10 years. In its 2023 comments, the Company provided additional detail regarding its commitment to employee safety, including its adherence to medical professionals' recommendations and the use of incident intervention services.⁵ The Department is encouraged by the continued improvement in employee safety metrics and has no further comments at this time.

In addition to reporting the number of cases and days with job transfer/restriction or away from work, OTP also reported on injury and illness types and property damage claims in the safety section of the Annual Report.

OTP has reported only injuries over the last ten years (no illnesses except for two skin disorders reported in 2024) in reports filed with OSHA and OSHD. The Company reported nine injuries in 2024 which is below the ten-year average of 12.54.

Otter Tail achieved its sixth year in a row without any new property damage claims in 2024.⁶

The Department acknowledges OTP's fulfillment of the annual safety report requirements of Minnesota Rules 7826.0400.

B.2. Department Recommendation

The Department recommends that the Commission accept OTP's annual safety report.

C. ANNUAL RELIABILITY REPORT

Minnesota Rules [7826.0500](#) through 7826.0700 delineate the:

- Reliability reporting requirements;
- Reliability standards; and
- Reporting requirements for major service interruptions.

The Department provides a summary and analysis of the reliability reporting requirements from statute and as modified by Commission Orders below.

C.1. Reliability Performance

In accordance with Minnesota Rules 7826.0500, OTP reports the utility's SAIDI, SAIFI, and CAIDI by work center and for all Minnesota customers for each calendar year.

⁵ *In the Matter of Otter Tail Power's 2023 Annual Safety, Reliability, and Service Quality Report*, Department Comments, June 14, 2024, Docket No.E017/M-24-30 (eDockets: [202410-210977-01](#)), at page 4. (hereinafter "Department 24-30 Comments").

⁶ Petition at 10 on Table 3.

The Commission established a benchmarking approach to setting reliability standards for investor-owned utilities using the IEEE benchmarks.⁷ IEEE benchmarks provide standardized reliability indices, such as SAIDI and SAIFI, which allow for consistent comparisons across utilities of similar size and characteristics. These benchmarks help regulators and stakeholders evaluate utility performance and identify areas for improvement. The Commission set OTP's statewide and reliability standards for its Minnesota service territory and the work-center level at the second quartile for medium utilities and for small utilities respectively.⁸

- IEEE does not publish its benchmarking results for the prior year until the third quarter of the following year, so OTP does not yet know how its 2024 performance metrics compare to the 2024 benchmarks. OTP will make a supplemental filing within 30 days of IEEE's Benchmark Year 2025 results for 2024 Data are published.⁹

The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the IEEE 2024 benchmarking data that OTP will file later in 2025.

2023 Performance and Benchmarks

In Docket No. E017/M-24-30, OTP filed the Company's reliability benchmarks as informed by the 2023 IEEE Benchmark Reliability Survey that was published in August 2024.¹⁰

⁷ *In the Matter of Otter Tail Power's 2019 Annual Safety, Reliability, and Service Quality Report*, PUC Order, December 18, 2020, Docket No. E017/M-20-401 (eDockets: [20212-169158-01](#)) at Order Point 9 (hereinafter "2019 OTP SRSQ Order") Order Point 6 adopted a new benchmarking methodology was first adopted at the Minnesota service territory-wide level. *In the Matter of Otter Tail Power's 2020 Annual Safety, Reliability, and Service Quality Report*, PUC Order, March 2, 2022, Docket No. E017/M-21-225 (eDockets: [20223-183363-01](#)) at Order Points 5, 6 and 7. (hereinafter "2020 OTP SRSQ Order"). This Order extended the new benchmarking methodology to the work-center level. Additionally, this Order established four work centers for OTP): Bemidji, Crookston, Fergus Falls, and Morris.

⁸ *In the Matter of Otter Tail Power's 2022 Annual Safety, Reliability, and Service Quality Report*, PUC Order, December 5, 2023, Docket No. E017/M-23-76 (eDockets: [20234-194475-01](#)) (2022 OTP SRSQ Order).

This the most recent Annual Report Order and maintains the IEEE benchmarking methodology for OTP's reliability standards.

⁹ Petition at 12, Department Attachment 2 OTP Response to Department IR No.3.

¹⁰ *In the Matter of Otter Tail Power's 2023 Annual Safety, Reliability, and Service Quality Report*, PUC Order, January 15, 2025, Docket No. E017/M-24-30 (eDockets: [20251-213880-01](#)) at Order Point 4 (hereinafter "2023 OTP SRSQ Order").

Table 2: OTP 2023 Reliability Performance vs IEEE Benchmark^{11, 12}

Work Center	Metric	2023 IEEE Benchmark	2023 OTP Performance – IMS Data	Met Benchmark?
Bemidji	SAIDI	121.00	106.29	Yes
	SAIFI	1.00	1.94	No
	CAIDI	139.00	54.73	Yes
Crookston	SAIDI	121.00	128.63	No
	SAIFI	1.00	1.7	No
	CAIDI	139.00	75.57	Yes
Fergus Falls	SAIDI	121.00	70.96	Yes
	SAIFI	1.00	1.04	No
	CAIDI	139.00	68.24	Yes
Morris	SAIDI	121.00	135.71	No
	SAIFI	1.00	1.61	No
	CAIDI	139.00	84.15	Yes
All MN Customers	SAIDI	121.00	96.28	Yes
	SAIFI	1.00	1.38	No
	CAIDI	139	69.89	Yes

Source: Minnesota Department of Commerce

OTP did not meet the SAIFI benchmark in 2023 for any of its work centers or its Minnesota territory-wide region. OTP performed well overall on the CAIDI metrics, but SAIDI performance was only average with Crookston’s and Morris’s SAIDI exceeding the benchmark (performing worse than the goal). OTP believes these SAIFI values are indicative of OTP’s unique rural service territory and low customer density which requires greater system exposure to service fewer customers per mile of transmission or distribution line relative to the average benchmark survey participant.

OTP commented in their supplemental filing regarding the subpar results for SAIDI stating:

Regarding the excessive SAIDI results for Crookston and Morris, Otter Tail believes that if the benchmark survey had broken down results by utility size, the results would have met the 2nd quartile median for medium sized utilities. For example, 2022 2nd quartile SAIDI IEEE medium sized utility results were 143 minutes.¹³

¹¹ In the Matter of Otter Tail Power’s 2023 Annual Safety, Reliability, and Service Quality Report, Petition, April 1, 2024, Docket No.E017/M-24-30 (eDockets:[20244-204846-01](#)), at page 11 (hereinafter: “OTP 24-30 Petition)..

¹² In the Matter of Otter Tail Power’s 2023 Annual Safety, Reliability, and Service Quality Report, Supplemental Filing and Amendment, August 15, 2024 and September 26, 2024 Docket No.E017/M-24-30 (eDockets:[20248-209217-01](#) and [20249-210498-01](#)), at pages 11 and 2 (hereinafter: “OTP 24-30 Supplements Comments” and “OTP 24-30 Supplemental Amendment”).

¹³ OTP 24-30 Supplemental Comments at page 2.

Based on its review of Otter Tail’s 2023 system-wide reliability requirements reporting, the Department concludes the Company appears to have fulfilled the requirements of [Minnesota Rules 7826.0500](#) subpart 1.A., 1.B., and 1.C. along with the work center reporting required by Commission orders.

2024 Performance

Since 2024 IEEE Benchmark Reliability Survey results will not be available until later this year, the Department reviewed 2024 performance against the 2023 IEEE benchmarks to serve as a proxy for the yet-to-be-calculated 2024 benchmarks. Table 3 shows the Company’s 2024 reliability performance compared with the 2023 goals set for the system using IEEE second quartile benchmarks for medium utilities. The 2023 goals for OTP’s work centers were set at the second quartile benchmarks for small utilities.

Table 3: OTP 2024 Normalized Reliability Performance vs. 2023 IEEE Benchmark^{14, 15}

Work Center	Metric	2024 OTP Performance	2023 IEEE Benchmark
Bemidji	SAIDI	114.77	121.00
	SAIFI	1.05	1.00
	CAIDI	109.75	139.00
Crookston	SAIDI	108.2	121.00
	SAIFI	.81	1.00
	CAIDI	133.73	139.00
Fergus Falls	SAIDI	220.37	121.00
	SAIFI	1.57	1.00
	CAIDI	140.44	139.00
Morris	SAIDI	108.74	121.00
	SAIFI	.8	1.00
	CAIDI	135.72	139.00
All MN Customers	SAIDI	141.55	121.00
	SAIFI	1.16	1.00
	CAIDI	122.22	139

Source: Minnesota Department of Commerce

Tables 3 and 4 provide a comparison of the IEEE 2023 performance year benchmark with OTP’s 2024 performance year for normalized performance. This comparison provides a point of reference for OTP’s actual 2024 reliability performance compared to the most-recent available goals. The Department will provide an updated letter reviewing the performance against the 2024 benchmarks

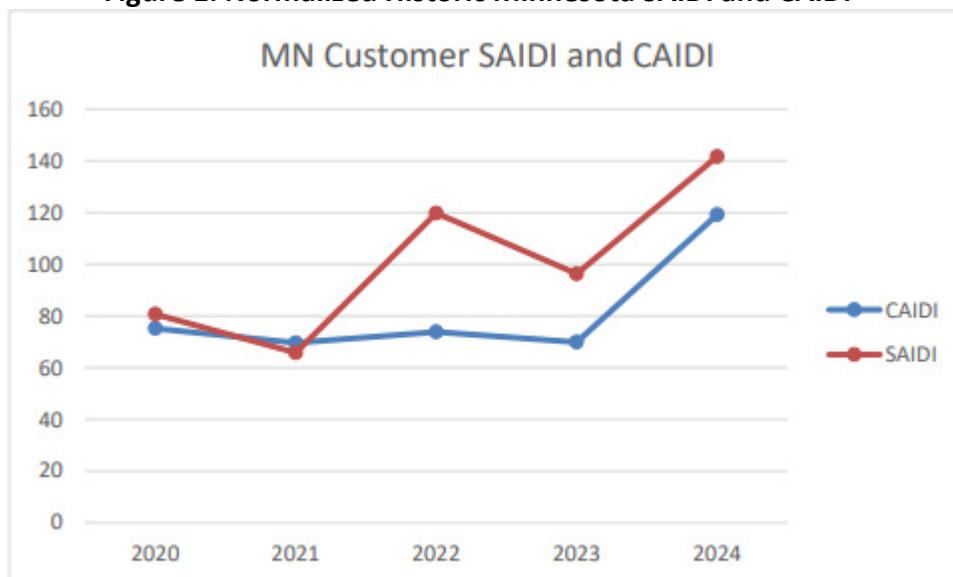
¹⁴ In the Matter of Otter Tail Power’s 2024 Annual Safety, Reliability, and Service Quality Report, Petition, April 1, 2025, Docket No.E017/M-25-30 (eDockets:), at page 12. (hereinafter “Petition”).

¹⁵ OTP 24-20 Supplemental Amendment at page 2.

after the Company submits its supplemental filing with the IEEE Benchmark Results Survey for the 2024 performance year.

Figures 1–3 illustrate OTP’s All-MN Customer SAIFI, SAIDI, and CAIDI performance metrics and associated goals over the past five years. As shown in the figures, the Company’s SAIFI rate has trended downward over the past three years from a peak in 2022. In contrast, the SAIDI and CAIDI rates have increased over the past year. Because the benchmarking goals have varied over time, the Company’s success in meeting those goals has also fluctuated. In its action plan for addressing any failure to meet reliability standards, OTP described system upgrades and maintenance activities intended to improve future performance.¹⁶

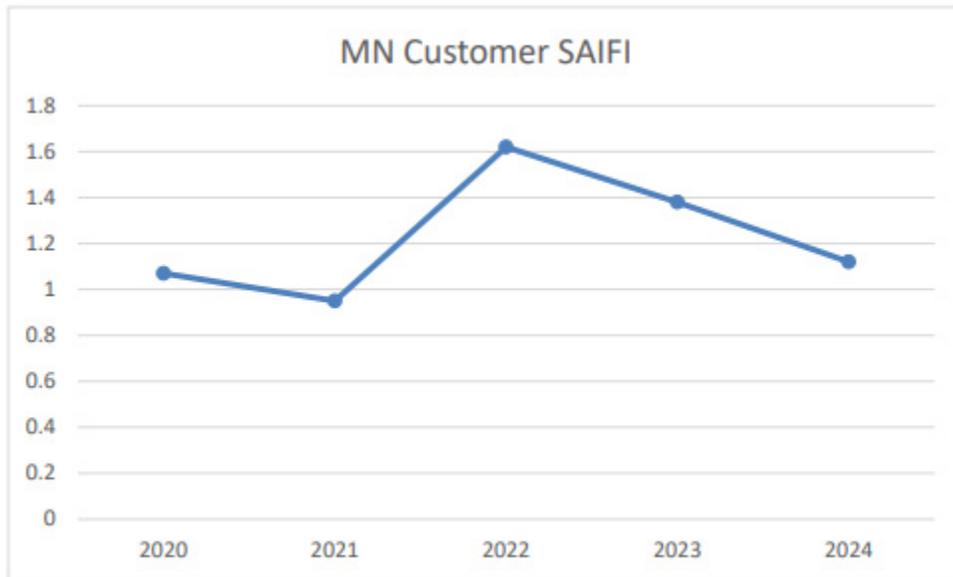
Figure 1: Normalized Historic Minnesota SAIDI and CAIDI¹⁷



¹⁶ Petition at 15.

¹⁷ Petition at 5.

Figure 2: All MN Customers SAIFI¹⁸



Based on its review of Otter Tail’s 2024 system-wide reliability requirements reporting, the Department concludes the Company appears to have fulfilled the requirements of [Minnesota Rules 7826.0500](#) subpart 1.A., 1.B., and 1.C. along with the work center reporting required by Commission orders.

C.2. Transition to Outage Management System (OMS) Data

Otter Tail’s new OMS went live December 20, 2022, and is the data source for reliability performance reporting starting with the 2024 Annual Report¹⁹

2024 is the first year Otter Tail Power is utilizing reliability data from its new OMS which gathers data at the customer level and not the feeder level as reported in past years.²⁰

¹⁸ Ibid.

¹⁹ Petition at 13.

²⁰ Petition, at 5.

Table 4: 2024 OTP Reliability Performance Normalized Data from OMS for 2024²¹

Metric	Work Center	2023 OMS Data ²²	2024 OMS Data ²³	Difference
SAIDI	Bemidji	106.29	114.77	8.48
	Crookston	128.63	108.2	(20.43)
	Fergus Falls	70.96	220.37	149.41
	Morris	135.71	108.74	(26.97)
	MN Total	96.28	141.55	45.27
SAIFI	Bemidji	1.94	1.05	(.89)
	Crookston	1.70	.81	(.89)
	Fergus Falls	1.04	1.57	.53
	Morris	1.61	.80	.81
	MN Total	1.38	1.16	(.22)
CAIDI	Bemidji	54.73	109.75	55.02
	Crookston	75.57	133.73	58.16
	Fergus Falls	68.24	140.44	72.20
	Morris	84.15	135.72	51.71
	MN Total	69.89	122.22	52.33

Source: Minnesota Department of Commerce

As shown in Table 4, the 2024 OMS data indicates an increase in the SAIDI for the Bemidji and Fergus Falls work centers, while SAIDI decreased in the Crookston and Morris work centers during the same period. OTP reported a decrease in the SAIFI for Bemidji, Crookston and Morris and an increase in SAIFI for the Fergus Falls work center in 2024. CAIDI increased in all work centers except Morris. These trends highlight the improved granularity of data provided by the OMS, which OTP expects to leverage in guiding future investment decisions. In comparing 2024 OMS data to 2023 figures, the Department notes a mixed performance—some work centers experienced deterioration, while others showed improvement. The Company believes that with the continued maturity of their current processes and the application of their new OMS technology that they will see improved customer service results.²⁴

As discussed in the Department’s September 28, 2023 [letter](#) in Docket No. E017/M-23-76, the Department expects to see more volatility in SAIDI, SAIFI, and CAIDI reported values as OTP begins reporting reliability performance data from the OMS. The Department anticipates that it will take several years of data reported from the OMS to begin to be able to assess trends in the Company’s reliability metrics included in the Annual Report.

²¹ Petition at 12.

²² OTP 24-30 Petition at 11.

²³ Petition at 12.

²⁴ Petition at 13.

C.3. Storm-Normalization Method

Because OTP is utilizing their new OMS in 2024, there was not enough data to provide the 2.5 beta normalization process this year. OTP instead calculated its 2024 SAIDI, SIAFI, and CAIDI indexes using an “analysis of 2023 OMS data and the selection of a duration threshold that would most likely provide IEEE’s selection and intention of the 2.5 Beta storm normalization process. OTP selected ten minutes as the major event day (MED) duration threshold.”²⁵

There was one Major Event Day in OTP’s entire system in 2024 which caused prolonged interruptions for most of North and South Dakota with very little impact to Minnesota customers. This was the result of a powerful cold front producing wind gusts up to 80 miles per hours (mph) which moved across the west, northwest portion of the OTP service territory.²⁶

The Department acknowledges OTP’s fulfilment of the requirements of Minnesota Rules 7826.0500, subpart 1D.

C.4. Action Plan to Improve Reliability

Otter Tail provided its original action plan as a [compliance filing](#) per the Commission’s Order in its 2011 Annual Report.²⁷ The Company has provided regular updates in its Annual Reports since that time and cautions that “overall system improvements will be realized over longer periods of time,” but its proposed action plan signifies continued contribution towards cost-effective improvement of overall system reliability.²⁸

The action plan is detailed on pages 15 – 17 of the report. A few of the updates are highlighted below:

- **Outage Management System (OMS).** As discussed in the reliability performance section above, OTP’s new OMS system went live in December 2022. Continued improvements took place throughout the year which mostly had to do with improvement processes surrounding data control and quality.²⁹
- **GIS Data Integration & Improvements.** Otter Tail started work in 2021 to improve the quality of its GIS data through a data collection effort performed by a third party. The data collection was completed in 2023, and quality review was completed in March 2024. OTP is using the data to better inform reliability improvement programs and projects. In addition, OTP is continuing the integration of critical system data into its GIS.³⁰

²⁵ Petition at 11.

²⁶ Ibid.

²⁷ *In the Matter of Otter Tail Power’s 2011 Annual Safety, Reliability, and Service Quality Report*, Compliance Filing, February 4, 2014, Docket No.E017/M-12-325 (eDockets:[20132-83528-01](#)).

²⁸ Petition at 15.

²⁹ Ibid.

³⁰ Petition at 16.

- **Vegetation Management Improvement.** OTP contracted with AiDash in 2023 to analyze 1,750 miles of distribution and 250 miles of transmission lines located in highly vegetated areas. AiDash uses high-definition satellite imagery in combination with artificial intelligence to direct vegetation management more strategically and efficiently.³¹ In 2024, OTP contracted with AiDash for an additional 1,960 miles of distribution lines to be assessed.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.E.

C.5. Bulk Power Supply Interruptions

OTP reported that its customers experienced one interruption to its Minnesota bulk power supply facility in 2024.³²

On May 6, 2024, strong winds damaged a 41.6KV supporting cross arm which came in contact with 115V transmission lines. This event impacted 569 customers in Barry, Beardsley, and Browns Valley for 41 minutes.³³

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.F.

C.6. Major Service Interruptions

On December 18, 2020, the Commission granted OTP a variance to [Minnesota Rule 7826.0500](#), subpart 1G, which required Otter Tail to provide a copy of each report filed under [Minnesota Rules 7826.0700](#).³⁴ Instead, OTP now provides a summary table that includes the information contained in the reports in Attachment 1 to the 2024 SRSQ Report.

In 2024, the Company reported 15 major service interruptions, a significant decrease from 26 incidents in 2023. The most impactful interruption occurred on July 13, 2024, affecting 3,525 customers.³⁵ This interruption also lasted the longest (eight hours and forty-two minutes for 510 customers, seven hours and twenty-three minutes for 1,372 customers, 5 hours for 1,173 customers and 3 hours and 14 minutes for 471 customers)³⁶. OTP stated in their response to the Department that the July event was marked by severe thunderstorms, strong winds, and large hail, resulting in widespread damage throughout the area. Numerous trees were uprooted, and several utility poles were broken, leading to

³¹ Petition at 16-17.

³² Petition at 17.

³³ Id.

³⁴ *In the Matter of Otter Tail Power's 2019 Annual Safety, Reliability, and Service Quality Report*, PUC Order, December 18, 2020, Docket No. E017/M-20-401 (eDockets:202012-169158-01), at Order Point 4.

³⁵ Petition at Attachment 1 at page 1. . includes the major service interruption reporting and lists events by month as well as a count by month.

³⁶ Ibid...

disruptions in power lines and conductors across multiple locations. OTP implements a comprehensive Vegetation Management Program, which includes regular inspections and proactive trimming of trees and other vegetation along extensive stretches of overhead distribution lines within its service area. OTP believes this program is a key measure in helping to mitigate future outages caused by similar weather events.³⁷

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.G.

C.7. Worst Performing Circuit

Otter Tail uses customer interruptions (momentary and sustained) to determine the worst performing circuit and defines circuit as a distribution feeder.³⁸

The Department uses past annual reports’ historical data to identify potential areas of concern with feeders that have been repeat worst performers. In 2024, the worst performing feeders by Customer Service Center (CSC) included a couple of repeat poor performers.

Table 5: OTP’s Worst Performing Circuits/Feeders³⁹

CSC	Feeder	Substation	Recent Worst Performer Record
Fergus Falls	North Feeder	Ottertail City	Last six years
Bemidji	North Feeder	Bemidji 25 th St	New worst performer
Crookston	Park View/West/East	Crookston UMN	New worst performer
Morris	North Feeder	Wheaton	Last two years

Source: Minnesota Department of Commerce

The North Feeder in Fergus Falls, supplied by Ottertail City, and the North Feeder in Morris, served by the Wheaton substation, continued to rank among the worst-performing circuits for multiple consecutive years. Additionally, the Bemidji North Feeder and the Crookston UMN circuit were identified as worst-performing circuits for the first time.

OTP has undertaken several initiatives to address performance issues at various feeders, including vegetation management and system upgrades. At the Bemidji North Feeder, OTP is currently evaluating upgrade options, such as the strategic installation of animal guards, following a major service interruption on September 13, 2024, caused by squirrel activity.

In Fergus Falls, OTP completed a project in June 2024 to replace existing overhead primary lines with underground cabling, following the delivery of pad-mount transformers. Based on positive results from similar overhead-to-underground conversions, OTP anticipates improved reliability for this feeder as well.

³⁷ Department Attachment 4, OTP Response to Department IR No. 4.

³⁸ Petition at page 18.

³⁹ Petition at page 18, Table 6.

Additionally, in Morris, OTP completed an overhead-to-underground distribution conversion project in November 2024. This upgrade is also expected to result in improved system performance throughout 2025.⁴⁰

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.H.

C.8. Compliance with ANSI Voltage Standards

OTP provided updated data on instances in where nominal electric service voltages on the utility side of the meter fell outside the American National Standards Institute (ANSI) standards. As shown in Table 6 below, these out-of-threshold events—both above and below the acceptable voltage range—have been increasing over the past five years.

Table 6: Summary of Below/Above Threshold Events in Minnesota (2019 – 2024)⁴¹

	2020	2021	2022	2023	2024
Below Threshold Events	407	456	1,137	1,846	1,344
Above Threshold Events	152,630	164,198	204,683	250,332	285,917

Source: Minnesota Department of Commerce

In its current report, OTP stated that the increase in events was primarily due to feeders experiencing voltage levels outside the ANSI Voltage Range B. Most of these feeders, which had multiple occurrences, serve a single large customer with a substantial load. OTP’s Incident Management System (IMS), which is used to collect data, captures instantaneous voltage deviations that fall outside of Voltage Range B. Going forward, OTP plans to utilize data collected from its Advanced Metering Infrastructure (AMI) system in future reports.⁴²

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.I.

C.9. Work Center Staffing Levels

Otter Tail provided work center staffing data, including the number of full-time employees by work center in 2024 in Table 8 on page 26 of the Petition. This information is summarized, along with total staffing levels over the past 10 years below.

⁴⁰ Petition at 18 – 19.

⁴¹ *Ib.* at 25.

⁴² *Ib.* at 19.

Table 7: OTP Work Center Staffing Levels (2014 – 2024)⁴³

Year	Field	Office	Total
2015	114	29	143
2016	116	32	148
2017	111	43	154
2018	123	39	162
2019	122	43	165
2020	121	45	166
2021	86	45	131
2022	92	45	137
2023	89	50	139
2024	104	51	155 ⁴⁴
10-Year Avg	107.8	42.2	150
Variance	(3.8)	8.8	5

Source: Minnesota Department of Commerce

Otter Tail has achieved a more normalized staffing level in 2024. However, between now and 2032, with the full implementation of AMI, the Company anticipates employee reductions. This is primarily due to increased automation, which will nearly eliminate the need for employees to physically read customer meters. These reductions are expected to be accomplished through attrition and reassignment of personnel.⁴⁵

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1.J.

C.10. Other Information

This section of OTP’s Annual Report provided updates on continuing developments from the Company’s efforts to utilize power quality monitors, deploy AMI meters and its new OMS, measure reliability, and improve grid resilience and reliability as discussed in its Integrated Distribution Plan (IDP).⁴⁶

The Department appreciates OTP’s efforts and additional information provided and acknowledges OTP’s fulfillment of the requirements of Minnesota Rules 7826.0500, subpart 1K.

⁴³ *Ib.* at 26.

⁴⁴ Department Attachment 5 OTP Response to Department IR No.2.

⁴⁵ Petition at 27.

⁴⁶ Petition at 28 – 29. OTP’s IDP is Docket No. E017/RP-23-380.

C.11. Department Recommendation

The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers 2024 benchmarking data that OTP will file later in 2025.

D. RELIABILITY STANDARDS FOR 2025

In Compliance with the Order in last year's SRSQ filing, Otter Tail included a discussion of reliability benchmarking in its report.

D.1. OTP's Proposed Reliability Standard

Otter Tail proposes to continue to set reliability indices at IEEE's Reliability Benchmark Survey median values for medium-sized utilities for the corresponding year's data set, i.e. 2025 goals will be based on the 2025 IEEE Benchmark Survey results, anticipated to become available by September 2025.⁴⁷

Please see section C.1. for further commentary on OTP's reliability performance and standards.

D.2. Discussion of EIA 861 Data

On page 42 of its report, OTP states that it has been submitting EIA-861 data since 2014 and is open to exploring the use of this benchmark data for future reliability performance comparisons. The Department notes that while the EIA-861 data set includes useful reliability metrics, it was not specifically developed for benchmarking and may have certain limitations for that purpose. OTP has proposed this as an alternative approach, though other methods for evaluating reliability performance have also been suggested above.

The EIA 861 website describes the data as a census of all United States electric utilities.⁴⁸ The 2023 final data appears to have been released on October 10, 2024, and the site lists the next release as October 2025. The 2023 final data for reliability includes responses from 967 utilities, including 42 responses from cooperative, municipal, and investor-owned utilities in Minnesota. Responding utilities provided varying levels of detail, typically providing data based on either the IEEE standard or an "other standard" that does not provide additional detail. Some utilities provided all data points for their chosen standard while some provide just a few of the data points for the chosen standard.⁴⁹ In 2023, EIA's reliability data provided a state summary, but this does not correspond to a simple average of the detailed data from the states tab. The methodology for the states tab of EIA data is unclear, and it was not provided in the 2021 and 2022 data that the Department reviewed.

⁴⁷ *Ib.* at 3.

⁴⁸ *Annual Electric Power Industry Report, Form EIA-861 detailed data files*. U.S. Energy Information Administration, (October 10, 2024). Available at: <https://www.eia.gov/electricity/data/eia861/>.

⁴⁹ The Department reviewed the EIA 861 data for 2023, Reliability_2023 spreadsheet to provide this detail on the EIA results.

The Department has concerns about the completeness of EIA data. The Department also notes that to provide relevant benchmarking, statistical analysis of EIA data would be required to determine appropriate comparisons.

D.3. Department Analysis

The Department reviewed OTP's proposed 2025 benchmark methodology, the historic IEEE benchmarking approach, and EIA data.

The Department will continue reviewing OTP's reliability performance in the given year against the approved benchmarks as well as reviewing OTP's year-over-year performance to understand the Company's performance trend.

See section C.1. for further commentary on OTP's reliability performance and standards for 2024.

D.4. Department Recommendation

The Department recommends that the Commission consider transitioning to an alternative approach for evaluating reliability standards for OTP based on the utility's discussion of IEEE reporting challenges and EIA Form 861 data. In the current Petition, OTP provided limited historical data, and the discussion remained at a high level. The Department believes that utilizing a five-year average of IEEE data, with a one-year reporting lag, would provide greater detail and allow for more informed conclusions. Additionally, this approach could eliminate the need for a supplemental filing later in the year. Minnesota Power has proposed a similar alternative in their current Petition. In Information Request (IR) 008, the Department asked OTP whether they would consider adopting this method for their 2025 filing. OTP responded that, while their preferred approach would be to use the Edison Electric Institute's (EEI) annual Reliability Survey Report, they would be open to using a five-year IEEE average if the Department finds it beneficial.⁵⁰

E. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules [7826.1300](#) require each utility to file information regarding its service quality performance as detailed in Minnesota Rules 7826.1400 through 7826.2000.

The Department provides a summary and analysis of the service quality reporting requirements from Minnesota Rules and as modified by Commission Orders below.

⁵⁰ See Department Attachment 1.

E.1. Meter Reading Performance ([Minn R. 7826.1400](#))

OTP provided detailed meter reading information, including information on its monthly meter-reading staffing levels in its Petition. Table 8 summarizes OTP’s meter reading statistics.

Table 8: Meter-Reading Performance 2015 – 2024⁵¹

	Percent Read by OTP	Percent Read by Customer	Percent Not Read
2015	95.9%	1.7%	2.4%
2016	96.4%	1.5%	2.2%
2017	96.4%	1.5%	2.2%
2018	97.3%	1.5%	1.2%
2019	97.5%	1.3%	1.2%
2020	97.1%	1.3%	1.6%
2021	97.0%	1.4%	1.6%
2022	96.5%	1.1%	2.4%
2023	96.7%	0.8%	2.5%
2024	98.3%	0.4%	1.3%
5-Year Average (2020 – 2024)	97.1%	1.0%	1.9%

Source: Minnesota Department of Commerce

OTP’s meter-reading performance over the years had remained consistent, and 2024 was no departure from this trend.

[Minnesota Rules 7826.0900](#), subpart 1 requires that at least 90% of all meters during the months of April through November and at least 80% of all meters during the months of December through March are read monthly. The Company’s information reflects that it read at least 95.5% of all meters each month during 2024. According to OTP, there were 5 meters that were not read for a period of six to 12 months but zero meters which were not read for a period of greater than 12 months in 2024. The Company stated that these meters went unread due to access issues where meters were located in locked buildings or otherwise inaccessible due to obstructions. OTP noted that all five of the meters were exchanged as part of their AMI project which will positively impact their ability to obtain readings in the future.⁵²

In 2024, the Company reported maintaining an average of 48 customer service representatives dedicated to meter reading.⁵³ Additionally, OTP engaged third-party contractors to perform meter reading services in select municipalities within its service territory. In February 2024, OTP initiated the deployment of AMI meters. As installation progressed across various communities, meter readings

⁵¹ Petition at 47.

⁵² Petition at 47.

⁵³ Petition at 48.

began to be transmitted directly from the AMI devices, thereby eliminating the need for manual readings. The contract for third-party meter reading services concluded in December 2024.⁵⁴

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.1400.

E.2. Involuntary Disconnections (Minn. R. 7826.1500)

The following table summarizes residential customer disconnection statistics reported by OTP in its annual reports.

Table 9: Residential Customer Involuntary Disconnect Information⁵⁵

	Received Disconnect Notice	CWR Protection			Disconnected Involuntarily	Restored within 24 Hours		Restored by Entering Payment Plan
		Sought	Granted	% Granted		Count	%	
2015	49,185	1,130	1,125	99.6%	629	232	36.9%	66
2016	49,368	932	928	99.6%	924	301	32.6%	42
2017	48,421	817	814	99.6%	1,044	415	39.8%	33
2018	62,201	659	657	99.7%	1,022	403	39.4%	32
2019	51,024	441	398	90.2%	463	146	31.5%	27
2020	14,082	121	82	67.8%	55	15	27.3%	17
2021	28,624	360	292	81.1%	702	330	47.0%	76
2022	43,732	444	379	85.4%	853	395	46.3%	78
2023	53,194	911	811	89.0%	1,239	614	49.6%	103
2024	48,290	843	757	89.8%	1,633	834	51.1%	190
10-Yr Avg	44,812	666	624	90.2%	856	369	40.1%	66

Source: Minnesota Department of Commerce

OTP reported that 52,448 disconnection notices were sent to residential, small commercial, and large commercial customers in 2024 with 48,290 (92%) of these notices being for residential customers. Although Table 9 shows 90.2% of customers seeking cold weather rule protection (CWP) were granted it, however, according to OTP all customers were granted CWP who requested it. OTP states customers were not denied CWP, but rather the customer chose an alternative payment option or obtained payment assistance. The Department notes that the percent of disconnections restored within 24 hours, on average, has been increasing over the last ten years.

⁵⁴ Petition at 50.

⁵⁵ Department corrections made to historical data as needed to limit table data to residential customers and reflect corrected involuntary disconnect totals. Data retrieved from prior years’ reports (Docket Nos. E017/M-16-276, E017/M-17-256, E017/M-18-247, E017/M-19-260, E017/M-20-401, E017/M-21-225, E017/M-22-159, E017/M-23-76, E017/M-24-30). 2024 data comes from Petition, Tables 24, 25, and 26.

The Department notes that the eviction moratorium that was in place during the early part of the COVID-19 pandemic ended in 2021,⁵⁶ and disconnection notices increased in subsequent years, but this figure is down modestly again in 2024.

The Department notes that the number of customers involuntarily disconnected has increased over the past six years. However, in 2024, both the number of customers restored within 24 hours and the number restored within 24 hours through a payment plan are above their respective 10-year averages.

E.3. Service Extension Request Response Times ([Minn. R. 7826.1600](#))

The following information is required for reporting on service extension request response times by customer class and calendar month:

- A. The number of customers requesting service to a location not previously served by the utility and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises was ready for service; and
- B. The number of customers requesting service to a location previously served by the utility, but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

OTP reported the number of service extension requests received each month by customer class. In 2024, 295 customers requested service to locations not previously served, with 87% of those installations completed within zero to two days of the requested in-service date.⁵⁷ By comparison, in 2023, 421 customers requested service to previously unserved locations, but only 37% of those were installed within the same timeframe.⁵⁸ This reflects a significant improvement in OTP's response time for new service extension requests.

For locations previously served, OTP reported that 930 requests were made in 2024 with 89.7% installed within zero to two days of the requested in-service date.⁵⁹

The Department acknowledges that OTP has fulfilled the requirements of Minnesota Rules 7826.1600.

E.4. Call Center Response Times ([Minn. R. 7826.1200](#) and [7826.1700](#))

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Further, Minnesota Rules 7826.1200 requires that 80% of calls during business hours be answered within 20 seconds.

⁵⁶ The disconnection moratorium was in effect from March 2020 to August 2021. See Docket E, G999/CI-20-375.

⁵⁷ Petition at 56 – 59, Tables 28 to 31.

⁵⁸ Department 24-30 Comments at page 18.

⁵⁹ Petition at 60 – 63, Table 32 to 35.

Table 10: Call Center Response Times

Year	Calls Offered	Calls Abandoned	Calls Answered After 20 Seconds	Calls Answered within 20 Seconds	% Calls Answered within 20 Seconds
	(A)	(B)	(C)	(D)	(E = D/A)
2020	55,180	192	3,097	51,891	94.04%
2021	53,747	527	3,097	50,123	93.26%
2022	56,022	556	5,458	50,008	89.26%
2023	54,752	892	11,779	42,081	76.86%
2024 ⁶⁰	48,122	822	9,686	37,614	78.16%

Source: Minnesota Department of Commerce

OTP did not meet the requirement to answer 80% of calls within 20 seconds. In 2024, OTP answered an average of 76.16% of calls within 20 seconds. September was the lowest performance month with 64.16% of calls answered within 20 seconds, and March was the highest performance month with 93.86% of calls answered within 20 seconds.

The Company attributed the reported decrease in call center response times to nine open Customer Service Representative (CSR) positions that had previously been filled. OTP faced challenges in recruiting for these roles and responded by expanding hiring locations when initial efforts were unsuccessful, reevaluating its interview process, and introducing a tiered structure within the CSR role to enhance its attractiveness. Six new hires were undergoing training during the fourth quarter of 2024, with plans to fill the remaining vacancies in the first quarter of 2025.⁶¹ In its response to Department request MN-DOC-007, OTP indicated that one CSR position remained unfilled as of June 9, 2025.⁶²

The Department concludes OTP is in compliance with the reporting required under Minnesota Rules 7826.1200 and 7826.1700 and has been working to improve call answer times through CSR staffing.

E.5. Emergency Medical Account Status ([Minn. R. 7826.1800](#))

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes section 216B.098, subdivision 5, the number of applications granted, the number of applications denied, and the reasons for each denial.

⁶⁰ Petition at 64

⁶¹ Petition at 64-65.

⁶² Department Attachment 3, OTP Response to Department IR No. 7.

In 2024, twelve OTP customers requested and were granted emergency medical account status, representing an increase from the ten customers who requested and were granted emergency medical account status in 2023.⁶³

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules 7826.1800.

E.6. Customer Deposits ([Minn. R. 7826.1900](#))

No customers were required to make a deposit as a condition of receiving service in 2024.

OTP suspended customer deposits in 2020, during the COVID-19 pandemic, and the Company made the decision to stop collecting deposits. The Company will continue to assess the need for deposits and reinstate the process to collect deposits if needed.⁶⁴

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules 7826.1900.

E.7. Customer Complaints ([Minn. R. 7826.2000](#))

OTP's report on customer complaints included the required information. Table 11 contains a limited summary of OTP's customer complaint history.

⁶³ Petition at 66.

⁶⁴ Petition at 67.

Table 11: Customer Complaint Selected Summary (2015 – 2024)⁶⁵

Year	Number of Complaints	# Forwarded by CAO	% Resolved on Initial Inquiry	% Resolved by Taking Customer-Requested Action	Top Complaint	
					Category ⁶⁶	%
2015	86	4	76.7%	23.3%	High Bills	12%
2016	28	2	93.0%	53.6%	Alleged Billing Errors & High Bills (tie)	22% (each)
2017	33	2	91.0%	24.2%	Walk-in Service	17.9%
2018	34	5	47.0%	20.6%	Alleged Billing Errors	15.63%
2019	28	13	54.0%	82.1%	Property Damage	47.06%
2020	30	4	80.0%	46.7%	High Bills	17.86%
2021	113	7	94.0%	18.0%	High Bills	30.00%
2022	109	7	82.0%	40.0%	Alleged Billing Errors	58.41%
2023	85	5	95.0%	43.5%	High Bills	30.28%
2024	113	11	93.0%	27.43%	Inadequate Service-field/operations	32.74%
10-Year Average	65.9	6	80.6%	37.9%		

Source: Minnesota Department of Commerce

The Company received eleven customer complaints that were forwarded from the Commission’s CAO, which exceeds the 10-year average of six complaints typically forwarded to CAO. OTP successfully resolved all eleven complaints, in addition to the outstanding complaint referenced in the 2023 report (Docket No. E017/M-24-30).⁶⁷

The total number of complaints in 2024 was 113, representing an increase from 2023 and remaining above the ten-year average of 65.9. The rise in complaints can be attributed primarily to the following categories (when comparing 2024 to 2023): high bills (10), inadequate service related to programs and services (7), inadequate customer service (6), and wrongful disconnections (5).⁶⁸

The Department noted that customer complaints increased from 85 in 2023 to 113 in 2024. Despite the increase in customer complaints, the Department acknowledges that OTP has met the requirements of Minnesota Rules 7826.2000. When asked to explain the rise in complaints, OTP stated that there was no single consistent cause, but rather a combination of factors including outages, tree trimming, and the activities of third-party AMI meter installers. OTP conducts annual training with its CSRs, which covers the definition of a complaint and includes discussion of various scenarios to guide

⁶⁵ Petition at 68-70.

⁶⁶ Table 13 excludes “Other” as the top compliant category in favor of the top descriptive complaint category. “Other” was the top complaint category in 2014, 2015, 2016, 2017, 2018 (tie), 2020, and 2022.

⁶⁷ Petition at 70.

⁶⁸ Docket No. E017/M-24-30 at 54, Petition at 68.

complaint classification. However, the determination of whether a call is logged as a complaint ultimately rests with the discretion of the CSR.⁶⁹

E.8. Department Recommendation

The Department recommends that the Commission accept OTP's annual service quality report.

F. COMPLIANCE WITH PERTINENT COMMISSION ORDERS

F.1. Docket No. E017/M-19-260 [Order](#) dated January 28, 2020⁷⁰

The Commission's January 28, 2020, Order in Docket No. E017/M-19-260 included Attachment B: Updated Annual Reporting Requirements.⁷¹ The Department summarizes OTP's compliance with each reporting requirement in turn below.

The requirements outlined in Attachment B include some reliability performance metrics that were discussed earlier in these comments as well as some additional metrics.

The Department notes that the Order required utilities to provide normalized and non-normalized data for several metrics. From the Department's perspective, normalizing data may be useful when looking at broad system trends such as SAIDI and SAIFI, and average customer impacts such as CAIDI and MAIFI can be deduced by these system trends. In contrast, the purpose of capturing CEMI and CELI is to better understand extremes (rather than averages), so normalizing this data seems to minimize the impact of multiple or lengthy interruptions experienced by customers by erasing the most extreme examples. With that said, the Department can appreciate the usefulness of being able to compare normalized and non-normalized data, and so will not make a reporting recommendation at this time.

The Department acknowledges that , although the OMS became operational on December 20, 2022, the 2024 Annual Report marks the first year in which this data has been utilized as the primary source for the Company's non-normalized Momentary Average Interruption Frequency Index (MAIFI) values for 2024. The Company explained that, as it transitions to AMI, the current process does not support an IMS audit or storm normalization.

⁶⁹ OTP response to email July 7, 2025, is included as Department Attachment 6.

⁷⁰ *In the Matter of Otter Tail Power's 2017 Annual Safety, Reliability, and Service Quality Report*, PUC Order, March 19, 2019, Docket No.E017/M-18-247 (eDockets: 201193-151212-01) at Order Point 3 (hereinafter "2017 OTP SRSQ Order"). and *In the Matter of Otter Tail Power's 2018 Annual Safety, Reliability, and Service Quality Report*, PUC Order, January 28, 2020, Docket No.E017/M-19-260 (eDockets: [20201-159705-02](#)) at Attachment B (hereinafter "2018 OTP SRSQ Order").

The 2018 OTP SRSQ Order clarified the reporting requirements that the 2018 SRSQ [Order](#) set. Department Attachment 6 provides Attachment B from the clarifying order.

⁷¹ The 2018 OTP SRSQ Order's Attachment B is included as Department Attachment 7.

F.1.1 Non-normalized SAIDI, SAIFI, and CAIDI values

OTP provided the non-normalized SADI, SAIFI and CAIDI on page 12 of its annual report, and the Department provides this information below.

Table 12: Non-Normalized SAIFI, SAIDI and CAIDI for 2024

CSC	SAIFI	SAIDI	CAIDI
Bemidji	1.1	117.87	107.36
Crookston	0.81	108.31	133.66
Fergus Falls	1.57	220.69	140.44
Morris	0.8	108.74	135.72
MN Total	1.18	153.23	129.73

Source: Minnesota Department of Commerce

F.1.2. Normalized SAIDI, SAIFI, and CAIDI values

OTP provided the normalized SADI, SAIFI and CAIDI on page 12 of its annual report, and the Department provides this information below.

One incident, which occurred on October 5, 2024, affected the storm normalization duration threshold for the year. Although the impact to Minnesota was minimal, wind gusts reaching up to 80 mph moved across the western and northwestern portions of Otter Tail Power Company’s service territory, resulting in the most significant service interruptions in North Dakota and South Dakota.⁷²

Table 13: Normalized SAIFI, SAIDI and CAIDI for 2024

CSC	SAIFI	SAIDI	CAIDI
Bemidji	1.05	114.77	109.75
Crookston	0.81	108.2	133.73
Fergus Falls	1.57	220.37	140.44
Morris	0.8	108.74	135.72
MN Total	1.16	141.55	122.22

Source: Minnesota Department of Commerce

F.1.3. MAIFI – Normalized and Non-normalized

OTP provided this information on page 34 of its 2024 SQSR Report. Table 14 presents the Company’s non-normalized MAIFI values for 2024. The Company explained that, as it transitions to AMI, the current process does not support an IMS audit or storm normalization.⁷³

⁷² Petition at 11.

⁷³ Petition at 34.

Table 14: 2024 MAIFI Non-Normalized⁷⁴

Work Center	MAIFI
Bemidji	3.21
Crookston	4.86
Fergus Falls	3.76
Morris	3.26
MN Total	3.7

Source: Minnesota Department of Commerce

2024 MAIFI values are lower than the range reported over the past five years and represent a decrease from 2023 across all work centers, except for Fergus Falls, which increased from 3.46 in 2023 to 3.76 in 2024. The Minnesota system-wide total of 3.70 is the lowest recorded MAIFI value in the past five years.

F.1.4. CEMI – Normalized and Non-normalized outage levels of 3, 4, 5, and 6

OTP provided this information in Tables 10 and 10a on page 35 of its Annual Report. Table 15 below shows the Company’s CEMI performance for 2024 at various intervals, and Figure 4 shows the CEMI trends over the last five years.

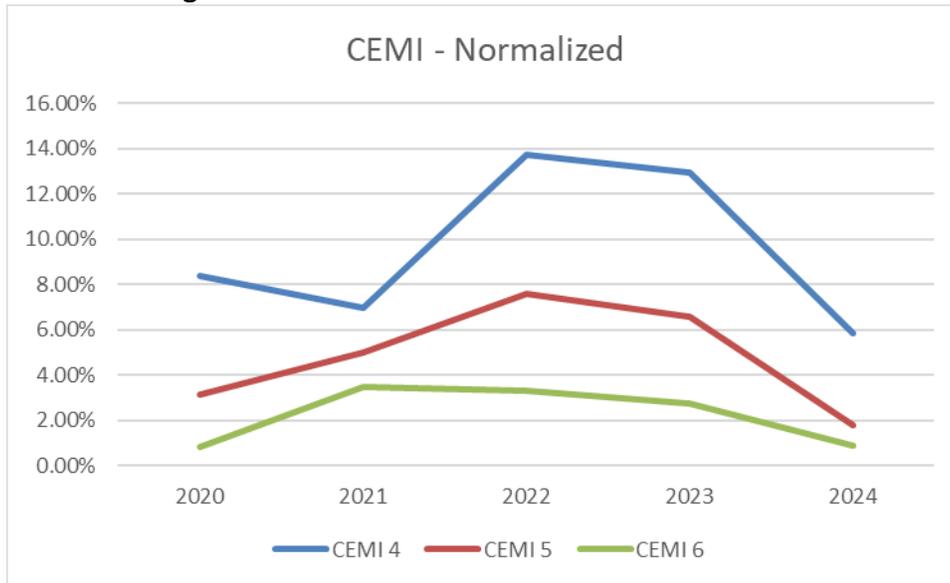
Table 15: 2024 Non-normalized and Normalized CEMI 4, 5 and 6 Hours

Length of Interruptions	Non-Normalized	Normalized
4	6.08%	5.83%
5	2.10%	1.81%
6	0.95%	0.90%

Source: Minnesota Department of Commerce

⁷⁴ Petition, Table 9, at 34.

Figure 3: CEMI Non-Normalized Data 2020 – 2024



CEMI reached a five-year peak in 2022, and has continued to decline, with 2024 reflecting some of the lowest levels observed over the past five years.

F.1.5. Highest number of interruptions experienced by any one customer

OTP provided this information on page 35 of its Annual Report. OTP reported that three customers experienced thirteen sustained interruptions, all of whom are located downstream of the Perham SE feeder. The causes of these interruptions included three equipment failures, three tree-related contacts, two by lightning, two instances of animal interference, two interruptions of unknown cause, and one caused by public activity.

F.1.6. CELI – Normalized and Non-normalized at intervals greater than 6, 12, and 24 hours

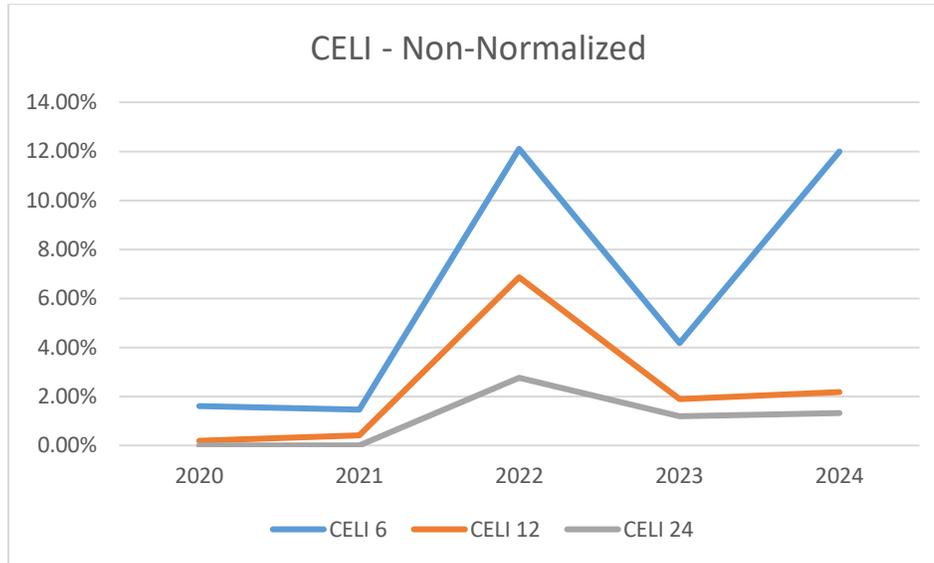
OTP provided this information in Tables 11 and 11a on pages 35-36 of its Annual Report. Table 16 below shows the Company’s CELI performance for 2024 at various intervals, and Figure 5 shows the CELI trends over the last five years.

Table 16: 2024 CELI at 6, 12, and 24 hours

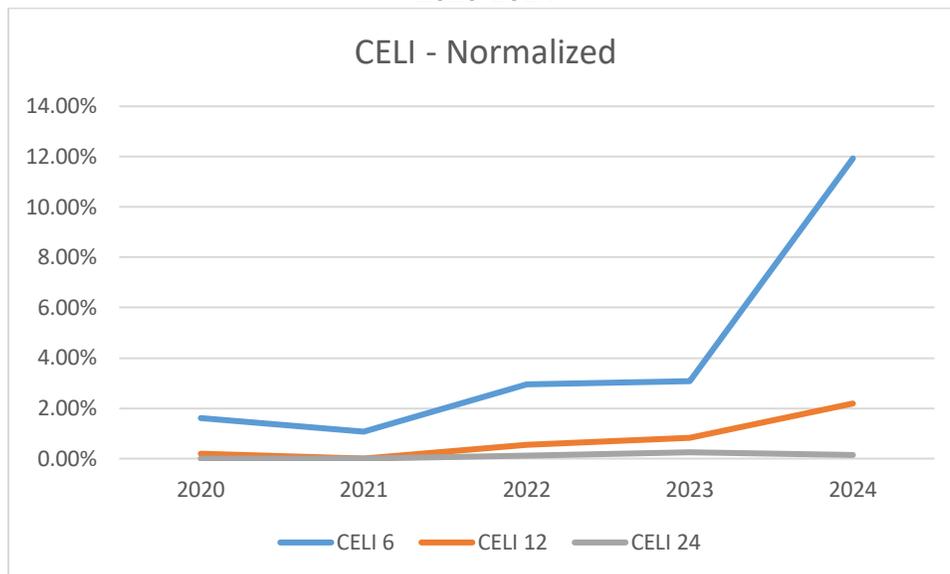
Length of Interruptions	Non-Normalized	Normalized
6	11.99%	11.93%
12	2.19%	2.19%
24	0.13%	0.13%

Source: Minnesota Department of Commerce

**Figure 4: CELI Non-Normalized Data
2020-2024**



**Figure 5: CELI Normalized Data
2020-2024**



CELI levels were at a five-year high in 2022 for non-normalized customers experiencing six-hour interruptions and declined in 2023. However, 2024 shows a significant increase in CELI levels for both normalized and non-normalized customers.

F.1.7. Longest interruption experienced by any one customer

In its Annual Report on page 36, OTP reported that on November 29, 2024, a fault in the underground system downstream of the MORRIS 115 kV Substation - South feeder caused a service interruption. As a result, 39 customers experienced an outage lasting 907 minutes (15 hours and 7 minutes).

F.1.8. Breakdown of field versus office staff

OTP provided this information on page 26 of its Annual Report. The Department previously discussed this information in Table 7 of these comments.

F.1.9. Estimated restoration times

OTP implemented its OMS in December of 2022 enabling it to begin reporting ETOR data in 2023, with full implementation achieved in 2024. The Company reported that over 40,000 customers across its three-state service area are now receiving ETOR updates via text, email, or push notifications.

OTP also stated that 9.4% of outages were restored within 30 minutes of the estimated time, while 20.26% were restored more than 30 minutes after the estimated time.⁷⁵

F.1.10. IEEE Benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI

This requirement was superseded by a similar requirement in a more recent Commission Order in Docket No. E017/M-21-225.⁷⁶ Reliability performance and benchmarking are discussed further in section C.1. Reliability Performance of these comments.

F.1.11. Performance by customer class

The Company stated it is not able to provide 2024 performance by class reporting in this report. At the time of the report preparation, the OMS report generation program was not functional. Otter Tail Power is currently working with our software/programming contractor to fix the issues.⁷⁷

F.1.12. Causes of sustained customer outages by work center

OTP provided this information in its discussion of the reliability reporting requirements in Section IV of the 2024 Annual Report and provided a categorized table of sustained interruptions by customer service center and cause in Table 5 of the filing. The new OMS allowed OTP to provide this detail at a greater level of granularity for than past reports.

⁷⁵ Petition at 36-37.

⁷⁶ *In the Matter of Otter Tail Power's 2020 Annual Safety, Reliability, and Service Quality Report*, PUC Order, March 2, 2022, Docket No. E017/M-21-225 (eDockets:[20223-183363-01](#)) at Order Points 5, 6 and 7. (hereinafter "2020 OTP SRSQ Order").

⁷⁷ Petition at 37.

F.2. *FLISR and AMI Reporting Requirements included in Commission's [Order](#) dated December 18, 2020⁷⁸*

Ordering paragraph 5: utilities must file the reliability for feeders with grid modernization investments such as Advanced Metering Infrastructure (AMI) or Fault Location Isolation and Service Restoration (FLISR) to the historic five-year average reliability for the same feeders before modernization investments.

These requirements are not applicable to OTP, as AMI and FLISR technologies have not yet been deployed on its system. OTP began full-scale AMI installations in February 2024, with completion expected by mid-2025. As this is the 2024 Annual Report, the Department notes that OTP should be prepared to report on this requirement in its 2025 filing.⁷⁹

Ordering paragraph 16: After consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data.

As a result of the 2021 Complaint Category Working Session, parties agreed to enhance the reporting of the "Inadequate Service" category by introducing four subcategories: Field/Operations, Customer Service, Programs and Services, and Cold Weather Rule Protection.⁸⁰ According to the 2024 SRSQ Report, Field/Operations remained the most frequently reported subcategory of complaint.⁸¹

F.3. *Docket No. E017/M-21-225 [Order](#) dated December 2, 2021*

Ordering paragraph 2 and 3: Required OTP to provide new information regarding electronic utility-customer interactions beginning with its reports filed in 2023 and required to report for three reporting cycles.

⁷⁸ *In the Matter of Otter Tail Power's 2019 Annual Safety, Reliability, and Service Quality Report*, PUC Order, December 18, 2020, Docket No. E017/M-20-401 (eDockets: [20212-169158-01](#)) at Order Point 5 (hereinafter "2019 OTP SRSQ Order"). This Commission issued an [Erratum Notice](#) January 15, 2021 to the 2019 OTP SRSQ Order to correct the 2020 reliability SAIDI standard for OTP's Fergus Falls location.

⁷⁹ Petition at 36.

⁸⁰ *In the Matter of Otter Tail Power's 2022 Annual Safety, Reliability, and Service Quality Report*, Petition, April 3, 2023, Docket No. E017/M-23-76 (eDockets: [20234-194475-01](#)) at pages 65 and 66 (hereinafter "2022 OTP SRSQ Petition").

⁸¹ Petition at 68.

OTP provided uptime and error rate percentage metrics for its electronic utility-customer interactive platforms in Table 13 of its filing,⁸² reproduced here:

Table 17: Uptime and Error Rate Percentage

Percentage Uptime		
	General Website	99.92%
	Payment Services	99.90%
	Third-party web payment services	100.00%
	Outage map &/or Outage Info page	100.00%
Error Rate Percentage		
	Payment Services	0.10%

Source: Minnesota Department of Commerce

The above data is in line with the up-time and error rate percentages reported in OTP’s 2023 Report.

OTP indicated that it is not able to provide more granular data to further categorize error rates into unexpected, outside the customer’s control, or other meaningful categorizations.

Ordering paragraph 4: Required OTP to continue to provide information on electronic utility-customer interactions as outlined in the Order.

OTP provided the required information in Tables 16 through 18 on pages 40-43 of the 2024 Annual Report. Website views increased significantly- by 131% compared to the 2023 report- representing over one million additional views year over year.

Ordering paragraph 7: Required OTP to continue to provide information on electronic utility-customer interactions as outlined in the Order.

The Company includes its 2024 public-facing summary as Attachment 2 to the SRSQ Report and published it online <https://www.otpco.com/help-center/> as a left-hand navigation option.

F.4. Public Facing SRSQ Summary Reporting⁸³

Ordering paragraph 8: Required the public-facing SRSQ summary to be published on the website after a single click away from the home page.

See Section F.3, Ordering Paragraph 7, above. OTP noted that it added a new left hand navigation option on the Help Center page to increase visibility of the summary.

⁸² Petition at 38.

⁸³ *In the Matter of Otter Tail Power’s 2021 Annual Safety, Reliability, and Service Quality Report*, PUC Order, November 9, 2022, Docket No.E017/M-22-159 (eDockets: [20231-192232-03](https://www.puc.state.mn.us/eDockets/20231-192232-03)) at Order Point 8 (hereinafter “2021 OTP SRSQ Order”).

The Department notes that from the home page, the SRSQ summary is more than one-click from the home page, but the “Safety, Reliability, and Service Quality” link is visible after one click from the home page. Once the user selects the “Our service standards” link from the Help Center page, they can select the desired year’s summary link to view the report (web path: OTP Home Page > Help Center > Safety, Reliability, and Service Quality > Select desired year’s report).

F.5. [Reporting Requirement Regarding Additional Complaint Information from the Summary of Customer Complaints Annual Docket \(YY-13\)](#)⁸⁴

This Order Eliminated the stand alone Annual Summary of Customer Complaints docket (YY-13) and required utilities to include customer complaint data from [Minnesota Rules 7826.2000](#) in the Annual Service Quality Reports.

F.6. *Order Setting Otter Tail Power’s 2023 Reliability Standards*⁸⁵ Docket No. E017/M-23-76

Set Otter Tail Power’s 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Otter Tail’s work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Required Otter Tail to file a supplement to its 2023 SQSR report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet.

In its initial filing, the Company acknowledged these requirements and committed to submitting a supplemental filing within 30 days of the IEEE’s publication of the 2023 benchmarking results. This supplemental filing was submitted on August 15, 2024.

F.7. *Order Setting Otter Tail Power’s 2024 Reliability Standards*⁸⁶

This Order set Otter Tail’s 2024 statewide reliability standard at the IEEE benchmarking second Quartile for medium utilities. The Commission will set Otter Tail’s work center reliability standards for 2024 at the IEEE benchmarking second quartile for medium utilities. The Commission will also require Otter Tail to file a supplement to its 2024 safety, reliability and service quality report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet.

The Company acknowledged these requirements in its filing and committed to submitting a supplemental filing within 30 days of the IEEE’s publication of the 2024 benchmarking results.

⁸⁴ *In the Matter of the Annual Summary of Customer Complaints pursuant to Minn. R. 7820.0500*, PUC Order, January 18, 2023 Docket No. E,G-999/PR-22-13 at Order Points 1 and 2 (eDockets:[20231-192232-02](#)).

⁸⁵ 2022 OTP SRSQ Order at Order Point 3.

⁸⁶ *In the Matter of Otter Tail Power’s 2023 Annual Safety, Reliability, and Service Quality Report and 2024 Reliability Goals*, PUC Order, January 13, 2025, Docket No.E017/M-24-30 (eDockets: [20251-213880-01](#)) at Order Points 4 and 5 (hereinafter “2023 OTP SRSQ Order”).

Ordering paragraph 8: *A discussion on alternative approaches to reliability standard setting in their 2024 safety, reliability, and service quality reports.*

The Department addresses this in greater detail in Section A: Response to Commission Question #2, above.

Ordering paragraph 9: *A discussion on the IEEE reporting sample size and data exclusion challenges from this year.*

OTP stated in its report that it does not hold a corporate membership with IEEE and does not participate in its survey. However, OTP does participate in EEI and has referenced EEI as an alternative approach to reliability standard setting, as noted above.

Ordering paragraph 10: *A discussion of using the EIA 861 data to benchmark utility reliability performance.*

OTP states that it has been submitting EIA-861 data since 2014 and is open to exploring the use of this benchmark data for future reliability performance comparisons.⁸⁷ While the EIA-861 dataset includes useful reliability metrics, it was not specifically developed for benchmarking and may have certain limitations for that purpose. OTP has proposed this as an alternative approach, though other methods for evaluating reliability performance have also been suggested above.

Ordering paragraph 11: *Data for 2024 from both its Interruption Monitoring System (IMS) and Outage Management System, if available.*

While OTP has provided this information in Tables 17 and 18 of the current Petition, they note that 2024 is the final year IMS data will be available. OTP transitioned to their new OMS system, which went live on December 20, 2022, and IMS data will no longer be collected going forward.

IV. DEPARTMENT RECOMMENDATIONS

Based on analysis of the report, OTP's responses to Department Information Requests, and the record, the Department provides the following recommendations which correspond to the subheadings of Section III .

B. ANNUAL SAFETY REPORT

- B.2. The Department recommends that the Commission accept OTP's annual safety report.

⁸⁷ Petition at 42.

C. ANNUAL RELIABILITY REPORT

- C.10. The Department will provide a recommendation on the Company's 2024 Reliability Report after reviewing the Company's future Supplemental Filing on the Institute of Electrical and Electronic Engineers (IEEE) 2024 benchmarking data that OTP will file later in 2025.

D. RELIABILITY STANDARDS FOR 2025

- D.4 The Department recommends benchmarking OTP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP's statewide system against IEEE's medium-sized utilities' data and OTP's work centers against IEEE's small-sized utilities' data.
- D.4 In the event that IEEE does not report utility-sized response results in the future, the Department recommends that the IEEE overall results for that year be used instead of relying on the utility-size results for the benchmark calculations.

E. ANNUAL SERVICE QUALITY REPORT

- E.8. The Department recommends that the Commission accept OTP's annual service quality report.
- The Department again requests that OTP include annual totals by customer class in its reporting of the number of customers whose service was involuntarily disconnected, as well as the number restored within 24 hours (Table 26 of the 2024 SRSQ Report). While this data is currently reported monthly by customer class, it is not aggregated at the annual level.

Attachments

- Attachment 1 Department IR 8 – Reliability Standards
- Attachment 2 Department IR 3 – 2024 IEEE Reliability Benchmarking
- Attachment 3 Department IR 7 – Call Center Response Time
- Attachment 4 Department IR 4 – Major Service Interruptions
- Attachment 5 Department IR 2 – Staff Levels
- Attachment 6 Otter Tail email- July 7, 2025
- Attachment 7 Order Attachment B, Docket E017/M-18-247

Response to Information Request MN-DOC-008**Page 1 of 2****OTTER TAIL POWER COMPANY**

Docket No: E017-M-25-30

Response to: MN Department of Commerce

Analyst: Lynn Behr & John Kundert

Date Received: June 17, 2025

Date Due: June 27, 2025

Date of Response: June 25, 2025

Responding Witness: Rod D. Jensen, P.E., Senior Reliability Engineer, 218-739-8552

Information Request:

Topic: Reliability Standards

Reference(s): Petition page 42-45

Request:

Minnesota Power (MP) proposed using a five-year average of the IEEE benchmarks to set their benchmarking. MP's proposed reliability benchmarking would continue basing the statewide system benchmark on IEEE's results for medium-sized utilities and work center benchmarks on small-sized utilities and have a one-year lag of IEEE data compared to the MP performance year. This means that for the 2025 performance year, MP proposes to benchmark the company's performance against IEEE Benchmark Year 2021-2025 results for 2020 – 2024 data. MP proposed moving away from a performance year matching approach to eliminate the need for a supplemental filing given that reliability varies year over year and nationally, peers experience varied weather, so a trend-based approach smooths out some of this volatility.

- A. Has Otter Tail Power Company considered alternative protocols for calculating its annual reliability benchmarks?
 1. If so, please provide a narrative that describes the Company's efforts, and the potential protocols reviewed.
- B. Would Otter Tail be open to providing an analysis of the effects of this benchmarking approach on its 2026 reliability goals for in its April 1, 2026, SRSQ filing?

Attachments: 0**Response:**

Otter Tail Power (or Company) is an electric utility with diverse geographic service territory. With a 70,000 square mile service territory (size of North Dakota), and 133,700 customers in 422

communities, Otter Tail Power is a unique rural utility that is not aligned with several IEEE benchmark participants (with increased urban regions). With that background in mind, Otter Tail Power provides the following narrative of the Company's efforts and potential protocols reviewed:

- A. Otter Tail Power has considered alternative protocols for calculating and selecting its annual reliability benchmarks and goals.
 1. Otter Tail Power has considered (and communicated in prior SRSQ filings) the use of Edison Electric Institutes (EEI) annual Reliability Survey Report. Recommended goals would be midpoint of specific indices for "All interruptions, normalized."
 - i. Otter Tail Power participates in this survey and results are designed within the summary findings.
 - ii. The EEI Reliability Survey Report is very comprehensive, including not only SAIDI, SAIFI, CAIDI, and MAIFI (also results by NERC control Regions), but also, CEMI, CELID, ASAI, and extensive outage cause analysis.
 - iii. For a copy of EEI's most recent (2023 data) Reliability Survey Report, please contact Rod Jensen P.E. rjensen@otpc.com.
- B. Otter Tail Power Company would be open to providing results based on the analysis proposed if the Minnesota Department of Commerce deems the process helpful and reflective of accurate performance analysis. For clarification, the Company believes the following AI assisted description of MP's proposed process is clearer and simpler:

MP proposes using a five-year average of IEEE benchmarks for reliability. They suggest benchmarking the 2025 performance year against IEEE 2021-2025 data, moving away from performance year matching to avoid supplemental filings due to yearly reliability variations.

Response to Information Request MN-DOC-003

Page 1 of 1

OTTER TAIL POWER COMPANY

Docket No: E017-M-25-30

Response to: MN Department of Commerce

Analyst: John Kundert, Lynn Behr

Date Received: May 28, 2025

Date Due: June 09, 2025

Date of Response: June 09, 2025

Responding Witness: Collin Kremeier, Supervisor Customer Care, Customer Care, 218-739-8443

Information Request:

Topic: 2024 IEEE Reliability Benchmarking

Reference(s): Table 4, Page 12

Page 4 of the petition states that the 2024 IEEE Reliability Benchmarking Report will be completed in the August 2024 timeframe. We believe this may be a typographical error and that August 2025 was intended.

Please confirm the correct IEEE report completion date. If a draft or preliminary version is currently available, please forward a copy for our review.

Attachments: 0

Response:

Yes, there is a typographical error. The sentence should read: “the 2024 IEEE Reliability Benchmarking Report will be completed in the August **2025** timeframe.”

There is no draft or preliminary version available.

OTTER TAIL POWER COMPANY

Docket No: E017-M-25-30

Response to: MN Department of Commerce

Analyst: John Kundert, Lynn Behr

Date Received: May 28, 2025

Date Due: June 09, 2025

Date of Response: June 09, 2025

Responding Witness: Collin Kremeier, Supervisor Customer Care, Customer Care, 218-739-8443

Information Request:

Topic: Call Center Response Time

Reference(s): Table 36, page 64

Table 36 shows the monthly breakdown of calls answered within 20 seconds. In 2024, the annual average was 78.16%, below the required 80% threshold. OTP cited difficulty filling nine open positions as a contributing factor. To address this, OTP adjusted hiring locations, reviewed interview strategies, and introduced CSR role tiers to make the position more attractive.

Please describe how these changes have impacted your hiring process and indicate how many CSR positions remain open. If any are still unfilled, outline your strategy to fill them within the next six months.

Attachments: 0

Response:

Otter Tail Power currently has one open Customer Service Representative (CSR) position and currently have a posting that is being published in June. We have this role posted in two different locations and we are confident we will be able to fill this role within the next six months.

We have been successful in filling other vacant CSR roles. In various situations we have advertised in multiple Customer Service Centers locations to expand our pool of applicants. We aim to hire high quality applicants that fit the role and Otter Tail Power.

Within the interview process we promote the CSR tier structure demonstrating an applicant's potential for a long-term stable career including the progression of wages. Having the tier structure allows an applicant to see the career and financial growth throughout their employment.

OTTER TAIL POWER COMPANY

Docket No: E017-M-25-30

Response to: MN Department of Commerce

Analyst: John Kundert, Lynn Behr

Date Received: May 28, 2025

Date Due: June 09, 2025

Date of Response: June 09, 2025

Responding Witness: Collin Kremeier, Supervisor Customer Care, Customer Care, 218-739-8443

Information Request:

Topic: Major Service Interruptions

Reference(s): Petition Attachment 1

The major service interruption affecting the most customers occurred on the evening of July 13, 2024, impacting multiple feeders and 3,526 customers. This incident also represents the longest duration of major service interruption noted in Attachment 1.

Please provide a detailed description of the circumstances surrounding these service interruptions, the resolutions implemented, and any efforts made to mitigate the occurrence of similar interruptions in the future.

Attachments: 0

Response:

On July 13, 2024, Otter Tail Power customers in the Pelican Rapids, Ottertail City and Fergus Falls areas experienced a service interruption due to a severe storm system that moved through the area. The storm brought intense thunderstorms, strong winds and large hail – some as large as 2 inches in diameter – causing widespread damage. Numerous trees were downed, and multiple utility poles were broken, disrupting lines and conductors at several locations.

In response, Otter Tail Power crews were immediately dispatched to assess damage and begin restoration efforts. Teams cleared debris, replace damaged poles and restrung power lines to restore service as quickly and safely as possible.

To help mitigate outages like this in the future, Otter Tail Power maintains a Vegetation Management Program. This program includes routine inspections and trimming of trees and other vegetation along many miles of overhead distribution lines across our service area. These proactive efforts are part of Otter Tail Power's long-standing commitment to maintaining system reliability and protecting public safety.

Response to Information Request MN-DOC-002

Page 1 of 2

OTTER TAIL POWER COMPANY

Docket No: E017-M-25-30

Response to: MN Department of Commerce

Analyst: John Kundert, Lynn Behr

Date Received: May 28, 2025

Date Due: June 09, 2025

Date of Response: June 09, 2025

Responding Witness: Collin Kremeier, Supervisor Customer Care, Customer Care, 218-739-8443

Information Request:

Topic: Staff Levels

Reference(s): Table 8, Page 26

There appears to be an addition error in the Morris Total: Field 25 + Office 4 should equal 29. Please review and provide a correction or clarification.

Attachments: 0

Response:

Otter Tail Power appreciates the Department's review and recognizing this miscalculation as it was a formula error. Below is an updated table with the correct to the Morris total and the grand total.

	Department	Type	Total
	Bemidji	Field	17
		Office	3
	Bemidji Total		20
	Crookston	Field	19
		Office	2
	Crookston Total		21
	Fergus Falls	Field	26
		Office	2
	Fergus Falls Total		28
	Morris	Field	25
		Office	4
	Morris Total		29
	Operations Support	Field	5
		Office	1
	Operations Support Total		6
	System Infra/Reliability	Office	8
	System Infra/Reliability Total		8
	Substation Maintenance	Field	12
		Office	1
	Substation Maintenance Total		13
	Customer Care & Relations	Office	30
	Customer Care & Relations Total		30
12/31/2024			155

From: [Kremeier, Collin](#)
To: [Behr, Lynn \(She/Her/Hers\) \(COMM\)](#)
Cc: [Kundert, John \(COMM\)](#)
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)
Date: Monday, July 7, 2025 5:46:13 PM
Attachments: [image011.png](#)
[image012.png](#)
[image013.png](#)
[image014.png](#)
[image002.png](#)

Good Evening,
My apologies for the late response here.

For your questions regarding table 26 on page 53. I can see how you are questioning this. Possible the way to look at this if we look at January as an example.

For the month we had a total of 25 customers disconnected. Eight of them were disconnected for more then 24 hours and 17 of them were disconnected and restored within 24 hours. When looking at your snip it from below, the number of residential customers appears to be low. When adding up the disconnections for residential from page 53 I have 1633 disconnects.

For the complaints, when reviewing the reasons for the complaints, there really was not a main driver or a consistent complaint. Most of our complaints fell into the Inadequate service – Field Operations category.

When reviewing the complaints reasons they ranged from outages, complaint toward third party AMI meter installers, Tree trimming.

Each year we do conduct training with our CSRs on complaints. The training includes a definition on what is complaint, discussing various situations and how those complaints can be categorized. However, with complaints there can be a judgement call on the CSR to determine if there was a complaint or not. We do attempt to train and accurately report the complaints.

Please let me know if you have any questions or if you would like to hop on a call I would be more then happy to. I will be out of the office tomorrow but I could meet on Wednesday.

Thank you
Collin



Collin Kremeier
Supervisor, Customer Care
Administration and Outage
Management

218-739-8443

otpc.com



From: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Sent: Monday, July 7, 2025 8:22 AM
To: Kremeier, Collin <ckremeier@otpc.com>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

This is an **EXTERNAL** email. DO NOT open attachments or click links in suspicious email.

Much appreciated,

Lynn

From: Kremeier, Collin <ckremeier@otpc.com>
Sent: Monday, July 7, 2025 8:08 AM
To: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

Thank you for the questions. I have been on out for the last few days, and I will review this today and respond before the end of the day.

Thank you
Collin



Collin Kremeier
Supervisor, Customer Care
Administration and Outage
Management

218-739-8443

otpc.com



From: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Sent: Monday, July 7, 2025 7:51 AM
To: Kremeier, Collin <ckremeier@otpc.com>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

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Hi Collin-

I have one more quick question for you regarding this Docket, then I will be completed with my review. Regarding customer complaints, in 2023 there were 85, but that number increased to 113 in 2024. Did anyone look into what caused the increase in complaints, and if so, are any adjustments being made to help reduce this number in 2025.

Thank you,

Lynn

From: Behr, Lynn (She/Her/Hers) (COMM)
Sent: Friday, July 4, 2025 11:39 AM
To: Kremeier, Collin <ckremeier@otpc.com>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

Hi Collin- as I continue to review this, can you tell me more about only the residential customers? I agree with your comments in total but when you break down the number of residential customers vs. the number of small commercial customers, it appears that more residential customers had power restored than disconnected within 24 hours. (Please refer to my snippet below) Am I reading that correctly from your table on page 53 of the petition?

Lynn

From: Behr, Lynn (She/Her/Hers) (COMM)
Sent: Friday, June 27, 2025 1:19 PM

To: Kremeier, Collin <ckremeier@otpc.com>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

Thank you for the clarification, I have what I need to continue my analysis.

Lynn

From: Kremeier, Collin <ckremeier@otpc.com>
Sent: Friday, June 27, 2025 12:50 PM
To: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

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Do not select links or open attachments unless verified. Report all suspicious emails to Minnesota IT Services Security Operations Center.

Good Afternoon,
Thank you for your patience as we continue to work through some storm restoration items.

In response to your question, for the number of customers disconnected and reconnected, in referencing page 53 of the petition table 26, in the grand total line at the bottom of the table, I do show total number of customers disconnected of 1728 and of them 892 were restored within 24 hours.

Please course correct me if I am misinterpreting your question.

Thank you
Collin



Collin Kremeier
Supervisor, Customer Care
Administration and Outage
Management

218-739-8443

otpc.com



From: Kremeier, Collin
Sent: Tuesday, June 24, 2025 3:33 PM
To: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: RE: Clarification Request Regarding (Docket No. E017/M-25-30)

Good Afternoon,

I will certainly look at this. If possible it may take me a day or two to respond as we are currently working through some storm restorations.

I will certainly follow up and appreciate you bringing this forward.

Thank you
Collin

Collin Kremeier
Supervisor, Customer Care
Administration and Outage



Management
 218-739-8443
 otpco.com
  

From: Behr, Lynn (She/Her/Hers) (COMM) <Lynn.Behr@state.mn.us>
Sent: Tuesday, June 24, 2025 2:55 PM
To: Kremeier, Collin <ckremeier@otpco.com>
Cc: Kundert, John (COMM) <john.kundert@state.mn.us>
Subject: Clarification Request Regarding (Docket No. E017/M-25-30)

This is an EXTERNAL email. DO NOT open attachments or click links in suspicious email.

Hi Collin-

As I review page 53 of your Petition, I've come across some figures that I hope you can help clarify.

According to my analysis, the data suggests that more customers had power restored within 24 hours than the total number of customers who experienced an involuntary disconnection in 2024. Below is an excerpt from my table reflecting this observation:

	Rec'd Disconnect Notice	Sought	Granted	% Granted	Disconnected Involuntarily	Count	%	Restored by Entering Payment Plan
2024	48,290	843	757	89.8%	799	834	104.4%	190

I would appreciate your assistance with the following:

- Could you please confirm whether the figures cited for 2024 are accurate?
- If they are, could you explain how the number of customers with restored service could exceed the number who were disconnected?

A prompt response would be greatly appreciated, as I aim to finalize my review by next week.

Thank you for your time and assistance.

Lynn M. Behr

Financial Analyst, Division of Energy Resources
 651-539-1034
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 Minnesota Department of Commerce
 85 7th Place East, Suite 280 | Saint Paul, MN 55101



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Attachment B: Updated Annual Reporting Requirements

1. Non-normalized SAIDI, SAIFI, and CAIDI values
2. SAIDI, SAIFI, and CAIDI, MAIFI, CEMI, and CELI normalized values calculated using the IEEE 1366 Standard.
3. MAIFI – normalized and non-normalized.
4. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.
5. The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).
6. CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.
7. The longest experienced interruption by any one customer (or feeder, if customer level is not available).
8. A breakdown of field versus office staff as required Minn. Rules 7826.0500 Subp. 1, J, including separate information on the number of contractors for each work center.
9. Estimated restoration time accuracy, using the following windows:
 - a. Within -90 minutes to 0 of estimated restoration time
 - b. Within 0 to +30 minutes of estimated restoration time
10. IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI from the IEEE benchmarking working group
11. Performance by customer class:

		ASAI	SAIDI	SAIFI	CAIDI	MAIFI
Residential	Non-normalized					
	Normalized					
Commercial	Non-normalized					
	Normalized					
Industrial	Non-normalized					
	Normalized					

If reporting by class is not yet possible, an explanation of when the utility will have this capability.

12. Causes of sustained customer outages, by work center.

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-25-30

Dated this **11th** day of **July 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
2	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Official 25-30
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-30
5	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-30
7	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 25-30
8	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
9	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
10	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-30
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
12	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
13	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
15	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-30
16	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
17	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30