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February 12, 2020

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

**Re: *In the Matter of Otter Tail Power's 2019 Integrated Distribution System Plan*
MPUC Docket No. E-017/M-19-693**

Dear Mr. Seuffert:

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits these Reply Comments in response to the Public Utilities Commission’s (“Commission”) November 19, 2019 Notice of Comment Period issued in the above-captioned docket.¹ These comments reiterate that Commission approval of Otter Tail Power’s Integrated Distribution Plan (“IDP”) should not be considered an advanced determination of prudence and support certain of the Department of Commerce’s (“Department”) and Clean Energy Economy Minnesota’s (“CEEM”) IDP recommendations.

In initial comments, the OAG recommended that the Commission incorporate into any approval of Otter Tail Power’s IDP an explicit statement that such approval does not constitute an advanced determination of prudence.² CEEM agrees, observing that “[p]re-approval of an action, such as ‘approving’ a distribution system plan, assumes the appropriateness of costs may be determined later. This embeds risk that approval of plans implies spending”³ The OAG concurs with and supports CEEM’s reasoning.

The Department and CEEM offer four (4) additional, and particularly valuable, IDP reporting recommendations. First, both parties conclude that Otter Tail Power’s initial IDP should be considered foundational.⁴ The OAG agrees that Otter Tail Power’s initial IDP is “the beginning of a dialogue between the utility, regulators, and stakeholders interested in the orderly,

¹ *In the Matter of Otter Tail Power's 2019 Integrated Distribution Plan*, Docket No. E-017/M-19-693, NOTICE OF COMMENT PERIOD (Nov. 19, 2019) (“OTP IDP Docket”).

² OTP IDP Docket, OAG COMMENT at 1 (Jan. 22, 2020).

³ OTP IDP Docket, CEEM COMMENTS at 3 n.7 (Jan. 22, 2020).

⁴ OTP IDP Docket, DEPARTMENT COMMENTS at 2-3, 9 (Jan. 22, 2020); CEEM COMMENTS at 5.

cost-efficient, and synergistic evolution of the distribution system.”⁵ It is imperative, however, that future Otter Tail Power IDPs evolve and become more refined so that the Commission, Department, OAG, and other interested stakeholders are more easily able to assess which IDP requirements and investments are beneficial to ratepayers and which are “ineffective, superfluous, or worse, contravene the intent of distribution system planning and create opportunities for utilities to justify unnecessary expenditures of ratepayer funds.”⁶

Next, the Department recommends that Otter Tail Power’s future IDPs more directly discuss how they meet the Commission’s planning objectives.⁷ Adoption of this requirement would focus the responsiveness of Otter Tail Power’s IDP, potentially minimizing the reporting of extraneous or vague plan information. It would also allow the Commission to more easily identify whether its planning objectives are being addressed.

The Department also recommends that IDP requirements be made uniform across utilities.⁸ Establishing reporting uniformity across utilities would permit interested stakeholders to cross-compare IDPs and possibly identify broader policy issues and trends. Moreover, Commission adoption of reporting uniformity could expand an IDP’s usefulness and ability to inform other Commission dockets.

Finally, CEEM recommends that Otter Tail Power be required to strengthen its IDP cost-benefit framework.⁹ The OAG shares CEEM’s view that more robust IDP cost-benefit reporting “plays a critical role in transparent IDP discussions and decision-making.”¹⁰ Such transparency is a necessary precursor to an informed evaluation of ratepayer cost versus ratepayer value and the OAG urges the Commission to adopt CEEM’s recommendation.

In sum, the Commission should not equate IDP approval with an advanced determination of prudence, and should make this explicit in any written order, or other document, it issues approving an IDP. From the OAG’s perspective, it is most appropriate for the Commission to treat Otter Tail Power’s 2019 IDP as a baseline for comparison with future IDPs, with the expectation that future IDPs will evolve and become more refined as Otter Tail Power gains experience with the IDP process. Finally, adoption of the Department’s and CEEM’s IDP recommendations discussed immediately above would enhance the Commission’s current IDP

⁵ OTP IDP Docket, DEPARTMENT COMMENTS at 2.

⁶ *Id.* at 9.

⁷ *Id.* at 8.

⁸ *Id.* at 9.

⁹ OTP IDP Docket, CEEM COMMENTS at 5.

¹⁰ *Id.*

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requirements by focusing IDP reporting, creating IDP uniformity across utilities, and improving transparency with respect to ratepayer IDP cost-benefit analyses.

Sincerely,

/s/ Max Kieley

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Enclosure

AFFIDAVIT OF SERVICE

Re: *In the Matter of Otter Tail Power's 2019 Integrated Distribution System Plan*
MPUC Docket No. E-017/M-19-693

STATE OF MINNESOTA)
) ss.
COUNTY OF RAMSEY)

I, JUDY SIGAL, hereby state that on the 12th day of February, 2020, I e-filed with eDockets *a Letter of the Minnesota Office of the Attorney General—Residential Utilities Division* and served the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.



JUDY SIGAL

Subscribed and sworn to before me
this 12th day of February, 2020.



Notary Public

My Commission expires: January 31, 2020.



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