

February 12, 2020

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-19-693

Dear Mr. Seuffert:

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

Otter Tail Power Company's 2019 Integrated Distribution Plan

As discussed in the attached reply comments, the Department provides its response to the Minnesota Public Utilities Commission's (Commission) November 19, 2019 *Notice of Comment Period on Otter Tail Power Company's 2019 Integrated Distribution Plan*.

The Department recommends that the Commission accept Otter Tail Power Company's IDP Report, and offers certain amendments to the Commission's *Minnesota Integrated Distribution Planning Requirements for Otter Tail Power Company*. The Department is available to respond to any questions the Commission may have on this matter.

Sincerely,

/s/ MATTHEW LANDI
Rates Analyst

ML/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-19-693

I. BACKGROUND

Over the past several years, the Minnesota Public Utilities Commission (Commission) has investigated utility distribution system planning and the modernization of the electric grid as it pertains to investor-owned utilities generally in Docket No. E999/CI-15-556 (Grid Modernization docket). The Grid Modernization docket was discussed at the Commission's April 19, 2018 agenda meeting, in which the Commission reviewed the draft Integrated Distribution Plan (IDP) filing requirements developed through a Commission-led stakeholder process and heard party comments. The proposed requirements direct utilities to file plans addressing: long-term distribution system modifications and investments, considerations used in related planning processes, and long-term distribution system future outlooks, among other requirements.

On February 20, 2019, the Commission issued its *Order Adopting Integrated Distribution Plan Filing Requirements* in Docket No. E017/CI-18-253, E015/M-18-254, and E111/CI-18-255 (the Order) establishing IDP filing requirements and deadlines for Otter Tail Power Company (OTP, or the Company), Minnesota Power, and Dakota Electric Association, respectively. The Order directed the utilities to file their first IDPs by November 1, 2019.

OTP subsequently filed its first IDP as required in this proceeding. On November 19, 2019, the Commission issued a *Notice of Comment Period* (Notice). The notice reaffirmed the purpose of the Commission's Integrated Distribution Plan (IDP) filing requirements:

- Maintain and enhance the safety, security, reliability, and resilience of the electric grid, at fair and reasonable costs, consistent with the state's energy policies;
- Enable greater customer engagement, empowerment, and options for energy services;
- Move toward the creation of efficient, cost-effective, accessible grid platforms for new products, new services, and opportunities for adoption of new distributed technologies;
- Ensure optimized utilization of electricity grid assets and resources to minimize total system costs; and
- Provide the Commission with the information necessary to understand the utility's short-term and long-term distribution-system plans, the costs and benefits of the specific investments, and a comprehensive analysis of ratepayer cost and value.

The Commission's Notice also included the following topics open for comment:

1. Should the Commission accept or reject Otter Tail Power's Integrated Distribution Plan (IDP)?
2. Does the IDP filed by OTP achieve the planning objectives in the filing requirements approved in the Commission's February 20, 2019 Order?
3. What IDP filing requirements provided the most value to the process and why?
4. Are there filing requirements that are not informative and/or should be deleted or modified, and why?
5. Are there other issues or concerns related to this matter?

On or before January 22, 2020, the Minnesota Department of Commerce, Division of Energy Resources (Department), Clean Energy Economy Minnesota (CEEM), the Office of the Attorney General—Residential Utilities Division (OAG), and Rakon Energy submitted Initial Comments in this proceeding.

II. DEPARTMENT ANALYSIS

The Department responds to Initial Comments from CEEM and the OAG regarding an issue that is important to address: that "approval" of OTP's 2019 IDP is not a finding of reasonableness of any proposed system modifications or investments nor a determination of prudence for any proposals contained within the IDP.¹

The Department agrees with both CEEM and the OAG that the Commission's approval or acceptance of OTP's IDP should not be understood as pre-approval nor an advanced determination of prudence for any proposals contained within OTP's IDP. Such proposals require detailed review on a case-by-case basis before those determinations can be made.

CEEM also encouraged the Commission "to use the IDP process to create communities of practice" so that the stakeholder community, the Commission, and utilities "all learn with and from each other as IDP evolves."² The Department agrees that this could be a worthwhile goal, as the IDP process has the potential to: address the informational asymmetry between stakeholders, regulators and utilities; enable more transparent planning processes and expenditures of ratepayer funds; and help all involved learn best practices and share lessons learned.

The Department does not have any other issues or concerns related to this matter at this time.

III. DEPARTMENT RECOMMENDATIONS

The Department appreciates the opportunity to comment on OTP's 2019 IDP. The Department makes the following recommendations:

¹ [OAG Initial Comments](#), dated January 22, 2020, at 1. [CEEM Initial Comments](#), dated January 22, 2020, at 3.

² CEEM Initial Comments, at 6.

- The Department recommends that the Commission accept OTP's IDP.
- The Department recommends that the Commission require Otter Tail Power to discuss in future filings how the IDP meets the Commission's Planning Objectives, including:
 - A. An analysis of how the information presented in the IDP relates to each Planning Objective,
 - B. The location in the IDP where each Planning Objective is discussed,
 - C. Analysis of efforts taken by the Company to improve upon the fulfillment of the Planning Objectives, and
 - D. Suggestions as to any refinements to the IDP filing requirements that would enhance Otter Tail Power's ability to meet the Planning Objectives.

- The Department recommends that the Commission amend IDP Requirement 3.D.2 (xi) of Otter Tail Power's IDP Requirements to read as follows:

For each grid modernization project in its 5-year Action Plan, require Otter Tail Power to provide a cost-benefit analysis based on the best information it has at the time and include a discussion of non-quantifiable benefits. Otter Tail Power shall provide all information to support its analysis.

- The Department recommends that the Commission merge IDP Requirements 3.D.1 and 3.D.2 of Otter Tail Power's IDP Requirements to read as follows:

Otter Tail Power shall provide a 5-year Action Plan as part of a 10-year long-term plan for distribution system developments and investments in grid modernization based on internal business plans and considering the insights gained from the DER futures analysis, hosting capacity analysis, and non-wire alternatives analysis. The 5-year Action Plan should include a detailed discussion of the underlying assumptions (including load growth assumptions) and the costs of distribution system investments planned for the next 5-years (expanding on topics and categories listed above). Otter Tail Power should include specifics of the 5-year Action Plan investments. Topics that should be discussed, as appropriate, include at a minimum:

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
Reply Comments**

Docket No. E017/M-19-693

Dated this **12th** day of **February 2020**

/s/Sharon Ferguson

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Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	26039 Bear Ridge Drive Cohasset, MN 55721	Electronic Service	No	OFF_SL_19-693_M-19-693
Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_19-693_M-19-693
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S Minneapolis, MN 55406	Paper Service	No	OFF_SL_19-693_M-19-693
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-693_M-19-693
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_19-693_M-19-693
Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_19-693_M-19-693
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Richard	Savelkoul	rsavelkoul@martinsquires.com	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
Thomas	Scharff	thomas.scharff@versoco.com	Verso Corp	600 High Street Wisconsin Rapids, WI 54495	Electronic Service	No	OFF_SL_19-693_M-19-693

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Christopher	Schoenherr	cp.schoenherr@smpa.org	SMPA	500 First Ave SW Rochester, MN 55902-3303	Electronic Service	No	OFF_SL_19-693_M-19-693
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-693_M-19-693
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_19-693_M-19-693
Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N. LaSalle Street Suite 3700 Chicago, Illinois 60601	Electronic Service	No	OFF_SL_19-693_M-19-693
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Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S Minneapolis, MN 55408	Electronic Service	No	OFF_SL_19-693_M-19-693

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