

March 18, 2020

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**  
Docket No. E017/M-18-380

Dear Mr. Seuffert:

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides these brief comments in response to the March 3, 2020 Comment Notice-Staff Recommendation on Terminating Compliance Filings (Notice).

The Notice requested comments regarding a future need for compliance filings in the above-mentioned docket.

The Minnesota Public Utilities Commission (Commission) approved on September 20, 2018 (2018 Order) Otter Tail Power Company's (OTP or the Company) proposed tariff changes to facilitate OTP's implementation of a new Customer Information Service with clarifying language added to the tariff.

The 2018 Order required OTP to track customer complaints and inquiries regarding proration of the customer charge and, as compliance filings in this docket, to file periodic reports.

As noted by the Notice, the Company provided three compliance filings (August 30 and November 18, 2019, and February 21, 2020).<sup>1</sup>

The Department's review of these compliance filings indicated that OTP received no complaints and twelve inquiries regarding proration of the customer charge (out of a customer base of about 62,000 customers).

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<sup>1</sup> The August 30, 2019 compliance filing covered the period from implementation on February 4, 2019 through June 30, 2019. The November 18, 2019 compliance filing covered the period from July 1, 2019 through September 30, 2019. Finally, the February 21, 2020 compliance filing covered the period from October 1, 2019 to December 31, 2019.

To complete the record in this proceeding, the Department requests that the Company provide a brief explanation in reply comments as to the questions its customers had and how they were resolved. In any case, because OTP's customers continue to have access to the Commission's Consumer Affairs Office, the Department agrees with Commission Staff's recommendation to:

- terminate the requirement of periodic reports as established in the September 20, 2018 order in order point #3; and
- require OTP to include information in their annual safety, service reliability, and service quality report if the Company receives five or more complaints related to the pro-rated customer charge during any calendar quarter.

Sincerely,

/s/ Samir Ouanes  
Rates Analyst

SO/ar

## **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-18-380**

Dated this **18<sup>th</sup>** day of **March 2020**

**/s/Sharon Ferguson**

| First Name     | Last Name          | Email                             | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|----------------|--------------------|-----------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Christopher    | Anderson           | canderson@allete.com              | Minnesota Power                    | 30 W Superior St<br><br>Duluth,<br>MN<br>558022191                 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Ray            | Choquette          | rchoquette@agp.com                | Ag Processing Inc.                 | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>68103-2047 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101    | Electronic Service | Yes               | OFF_SL_18-380_M-18-380 |
| James C.       | Erickson           | jericksonkbc@gmail.com            | Kelly Bay Consulting               | 17 Quechee St<br><br>Superior,<br>WI<br>54880-4421                 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Sharon         | Ferguson           | sharon.ferguson@state.mn.us       | Department of Commerce             | 85 7th Place E Ste 280<br><br>Saint Paul,<br>MN<br>551012198       | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Bruce          | Gerhardson         | bgerhardson@otpc.com              | Otter Tail Power Company           | PO Box 496<br>215 S Cascade St<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Shane          | Henriksen          | shane.henriksen@enbridge.com      | Enbridge Energy Company, Inc.      | 1409 Hammond Ave FL 2<br><br>Superior,<br>WI<br>54880              | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Douglas        | Larson             | dlarson@dakotaelectric.com        | Dakota Electric Association        | 4300 220th St W<br><br>Farmington,<br>MN<br>55024                  | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| James D.       | Larson             | james.larson@avantenergy.com      | Avant Energy Services              | 220 S 6th St Ste 1300<br><br>Minneapolis,<br>MN<br>55402           | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Kavita         | Maini              | kmmaini@wi.rr.com                 | KM Energy Consulting, LLC          | 961 N Lost Woods Rd<br><br>Oconomowoc,<br>WI<br>53066              | Electronic Service | No                | OFF_SL_18-380_M-18-380 |

| First Name     | Last Name                      | Email                                | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name      |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Andrew         | Moratzka                       | andrew.moratzka@stoel.com            | Steel Rives LLP                    | 33 South Sixth St Ste 4200<br><br>Minneapolis,<br>MN<br>55402                | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| David G.       | Prazak                         | dprazak@otpc.com                     | Otter Tail Power Company           | P.O. Box 496<br>215 South Cascade Street<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131           | Electronic Service | Yes               | OFF_SL_18-380_M-18-380 |
| Larry L.       | Schedin                        | Larry@LLSResources.com               | LLS Resources, LLC                 | 332 Minnesota St, Ste<br>W1390<br><br>St. Paul,<br>MN<br>55101               | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Will           | Seuffert                       | Will.Seuffert@state.mn.us            | Public Utilities Commission        | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101                       | Electronic Service | Yes               | OFF_SL_18-380_M-18-380 |
| Cary           | Stephenson                     | cStephenson@otpc.com                 | Otter Tail Power Company           | 215 South Cascade Street<br><br>Fergus Falls,<br>MN<br>56537                 | Electronic Service | No                | OFF_SL_18-380_M-18-380 |
| Stuart         | Tommerdahl                     | stommerdahl@otpc.com                 | Otter Tail Power Company           | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537               | Electronic Service | No                | OFF_SL_18-380_M-18-380 |