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December 23, 2013



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

**Re: In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section 216B.1691
MPUC Docket No. E999/CI-13-542
COMMENTS**

Dear Dr. Haar:

Otter Tail Power Company submits the enclosed Comments in response to the Minnesota Public Utilities Commission's Notice for Comment on Customer Exclusions from the Solar Energy Standard – Phase 2 issued in its December 3, 2013 Notice regarding implementation of the Solar Energy Standard.

We have electronically filed this document with the Commission, which also constitutes service on the Department of Commerce and the Office of the Attorney General. A copy of this filing has been served on all parties on the official service list in this docket.

Please contact me at (218) 739-8956 or cstephenson@otpc.com if you have any questions.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

dm
Enclosures
By electronic filing
c: Service List

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

In the Matter of the Implementation of Solar
Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section
216B.1691

Docket No. E-999/CI-13-542

**OTTER TAIL POWER COMPANY
COMMENTS**

INTRODUCTION AND BACKGROUND

On December 3, 2013, the Minnesota Public Utilities Commission (“Commission”) issued its Notice for Comment on Customer Exclusions from the Solar Energy Standard – Phase 2 in the above-captioned matter. The Commission’s request for Comments included a list of Topics Open for Comment in the Matter of the Implementation of Solar Energy Standards (“SES”) Pursuant to 2013 Amendments to Minnesota Statute, Section 216B.1691. The initial comment due date is December 23, 2013, with Reply Comments due January 15, 2014. Otter Tail Power Company (“Otter Tail” or the “Company”) submits the following comments in this matter.

COMMENTS

Below we provide the Company’s response to the Topics Open for Comment in the Notice:

What specific NAICS codes should be used to screen customers who are potentially eligible for exclusion from the Solar Energy Standards (SES), and why?

- **The list included in the Department of Commerce’s August 29, 2013 comments?**
- **The list included in Minnesota Power’s August 25, 2013 filing?**
- **Some other set of NAICS codes?**

Otter Tail’s Response: Otter Tail supports the use of the NAICS codes included in the Department of Commerce’s August 20, 2013 comments. The Department’s list appears to be a comprehensive list of codes that fall within the scope of the statutory exemptions. In our view, however, the Department’s list should not be definitive. Otter Tail believes there should a process to allow customers to expand the list of approved NAICS codes.

What criteria other than NAICS codes, if any, should be used to make a final determination of customer eligibility?

- **Size or rate schedule criteria, such as having a minimum kW demand or being on a demand-metered or large C&I rate?**
- **A certain percentage of customer activity being in a qualified NAICS code?**
- **The specific statutory activity tied to a facility, account, and/or meter? For example, if a customer who qualifies by NAICS code has its manufacturing facility on one meter and its headquarters office on a different meter, does the latter qualify? Does it matter if the headquarters office is at a different site than the manufacturing facility?**
- **Some other criteria?**

Otter Tail's Response: As noted in our filing of August 13, 2012, we do not believe that size limitations such as kW demand or kWh usage should be used in determining customer exemptions. Such limitations are not included in the solar exemption legislation. The use of size or rate schedule benchmarks may result in unintended negative consequences, such as the creation of a competitive advantage for the larger companies who qualify for the exemption versus smaller customers who would not qualify for the exemption.

Otter Tail believes that it would be difficult to design a rationale criteria based on the percentage of customer activity within a qualified NAICS code. Customer activity could have several different components, including among other things sales, production volumes, and hours of operation, making it difficult to develop uniform standards. Moreover, there is the issue of verification. Neither utilities nor the PSC are in a position to determine percentages based on certain activities.

The statutory exemptions apply to customers "that are" certain types of facilities or operations. This construction suggests and could reasonably support a requirement that the primary or predominant activity of the customer must fall within one or more of the NAICS codes adopted by the PUC. This approach is consistent with the general use of NAICS codes, which purport to reflect the primary business activity of the establishment holding or assigned the code.

Otter Tail does not think it worthwhile or workable to adopt a process that requires customers to allocate corporate and back office functions to or from an establishment's primary

business activity. Functions like human resources and payroll, even if performed at a different location than manufacturing or mining activities, are likely considered as part of the manufacturing or mining activities.

Otter Tail suggests a process where the customer seeking the exemption designates the exemption's scope. The customer would indicate whether the exemption applies to the customer's (a) entire account (which could include one or more meters at one or more facilities), (b) one or more meters, (c) or to a particular facility (which could include several meters). The customer would need to certify that the primary business activity of the designated account/meter/facility falls within an approved NAICS code. This process would make clear that utilities can rely on the customer's designations.

What information should customers who apply for exclusions be required to provide?

Otter Tail's Response: Otter Tail believes that it is reasonable to require customers seeking an exemption to (1) identify the facility, meter or account for which the exemption is sought, and (2) identify the PSC-approved NAICS code that applies to the facility, meter or account. It would be reasonable to require certification that the information provided is accurate and truthful. There could also be an affirmative obligation for the customer to give notice to the utility if the customer's business activity changes and falls outside of the approved NAICS code.

Dated: December 23, 2013

Respectfully submitted,

OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

**Re: In the Matter of the Implementation of Solar Energy Standards Pursuant to 2013
Amendments to Minnesota Statutes, Section 216B.1691
MPUC Docket No. E999/CI-13-542**

I, Diane Merz, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Comments**

Dated this **23rd** day of **December 2013**.

/s/ DIANE MERZ

Diane Merz
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