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June 13, 2018

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: In the Matter of Otter Tail Power Company's 2018 Conservation Cost Recovery
Adjustment and 2017 Electric Demand Side Management Financial Incentive
Docket No. E017/M-18-119
REPLY COMMENTS**

Dear Mr. Wolf:

The Minnesota Department of Commerce Staff (Department) filed comments on May 30, 2018, recommending approval of Otter Tail Power Company's 2017 year-end CIP tracker balance, financial incentive, updated CIP surcharge, and a variance to two Minnesota Rules.

Otter Tail Power Company (Otter Tail) provides the following Reply Comments to the Department clarifying its CIP financial performance incentive request.

Please feel free to contact me at 218-739-8639 or jgrenier@otpc.com with any questions.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Market Planning

jch
Enclosures
By electronic filing
C: Service List

**OTTER TAIL POWER COMPANY REPLY COMMENTS
TO THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**REGARDING OTTER TAIL POWER COMPANY'S 2017
DEMAND SIDE MANAGEMENT FINANCIAL INCENTIVE PROJECT
AND ANNUAL FILING TO UPDATE THE CONSERVATION
IMPROVEMENT PROGRAM (CIP) RIDER.**

**DOCKET NO. E017/M-18-119
June 13, 2018**

I. Background

Otter Tail Power Company (Otter Tail or the Company) respectfully responds to the Minnesota Department of Commerce, Division of Energy Resources (Department or Staff) Response Comments in Otter Tail's 2017 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Program (CIP) Rider.

On May 30, 2018, the Department recommended:

- 1. approve Otter Tail's 2017 CIP tracker account resulting in a December 31, 2017¹ tracker balance of \$7,362,345;*
- 2. approve an incentive of \$2,642,360 for Otter Tail's 2017 CIP achievements;*
- 3. approve a CCRA of \$0.00600 per kWh, to be effective October 1, 2018;*
- 4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket; and*
- 5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.*

The Department comments also recommended the Commission deny the Company's proposal to carry forward \$4,053,482 of net benefits from 2017 to 2018.

Otter Tail appreciates the Department's review and recommendations on the Company's March 30, 2018 proposals. Otter Tail and the Department agree on nearly all items within this docket.

¹ The Department's May 30, 2018 comments listed the requested \$7,362,345 as a December 31, 2016 amount. The correct year of 2017 is shown in these reply comments.

Otter Tail provides the following clarifying comments regarding its CIP financial performance incentive request.

II. Discussion of Financial Performance Incentive

Otter Tail’s initial financial performance incentive proposal included a plan to carry forward 9,006,674 kWh of energy savings and the associated \$4,053,482 of net benefits from 2017 to 2018. Otter Tail provides an alternative remedy to address the merits of its 2017 CIP achievements and the unique circumstances limiting the Company’s 2017 CIP financial performance incentive.

Otter Tail’s CIP energy savings in 2017 achieved 3.02 percent of Company sales, a record for Otter Tail and by the Company’s analysis, see Table 1, the highest percent savings level ever achieved by an electric utility in Minnesota.

Table 1	Otter Tail	Xcel Energy	Minnesota Power
	Energy Savings (%)	Energy Savings (%)	Energy Savings (%)
2017	3.02%	2.27%	2.60%
2016	2.75%	1.91%	2.10%
2015	2.33%	1.73%	2.84%
2014	1.62%	1.66%	2.50%
2013	1.67%	1.71%	2.50%

Otter Tail’s 2017-2019 CIP triennial plan was initially approved in November 2016. This plan included a multi-year LED street light project to change out all company-owned street lights in Minnesota. Including the LED street light project in CIP was a creative concept by the Company to deliver net benefits to customers, deliver a requested product to customers, and was not to be included towards the financial incentive calculation since the project comprised of Company-owned lights.

To implement the LED street light project, the Company first needed to update its rate schedules to accommodate the new LED fixtures. On February 22, 2017, the Company filed a plan with the Minnesota Public Utilities Commission (MPUC) to update its Street and Area Lighting rate schedule and implementation plan, Docket No. E017/M-17-152. The Company believed the rate schedule changes would be approved in 2017 and implementation of the LED project would launch. Unfortunately, the administrative process took longer than expected with several extensions to the docket. The MPUC approved Otter Tail’s LED with an order issued on December 13, 2017. With the approval very late in 2017 Otter Tail was unable to implement the

program in 2017. The MPUC’s order approved a spending cap on the LED project of \$775,483² in year one of the multi-year project.

Otter Tail’s financial incentive was significantly impacted by the long administrative process for approval of the LED project. Otter Tail appreciates the work by all parties to gain approval of the LED project, but the Company did not intend the negative impacts to the Company’s CIP financial performance incentive.

The Company’s 2017 CIP net benefits of \$23,626,518 equated to a financial incentive of \$3,189,580, but with the new rule only allowing the financial incentive to be 40 percent of spending, Otter Tail’s financial incentive was limited to \$2,642,360 based on \$6,605,899 spending in 2017.

Otter Tail’s 2017 CIP achievements are record setting and should not be limited by the unique circumstances created by the administrative process. Otter Tail requests the MPUC to allow the Company to include the MPUC approved budget of \$775,483 for the LED project towards the Company’s spending in 2017 for calculations of the financial performance incentive. The Company made a good faith effort to offer a customer focused program in 2017 but did not believe the Company’s financial incentive would be negatively impacted as a result.

Including the \$775,483 for the LED project on top of the Company’s \$6,605,899 spending for 2017 equals a total of \$7,381,382. Forty percent cap on this amount equals a performance incentive of \$2,952,552 which is lower than the \$3.1M actual performance but higher than the \$2.6M with the 40 percent spending cap. Otter Tail believes this is a reasonable approach to reward the Company for record setting energy savings. This approach still applies the 40 percent spending cap, encourages the utility to pursue non-financial incentive customer focused energy saving programs in the future, and remedies the unique circumstances created by the administrative process. Table 2 below a summary of Otter Tail’s proposal.

	2017 CIP Actual Results	2017 CIP Results Including LED Lighting Budget
Table 2		
Energy Savings (kWh)	52,497,167	52,497,167
Net Benefits	\$23,626,518	\$23,626,518
Program Spending	\$6,605,899	\$7,381,382
Savings as % of Historic Sales	3.02%	3.02%
Net Benefits Cap for Fin. Incentive	13.5%	13.5%
Financial Incentive from Net Benefits	\$3,189,580	\$3,189,580
Financial Incentive after Spending 40% Cap	\$2,642,360	\$2,952,553

² Table 1, Summary of Proposed Cost Recovery, Otter Tail’s November 9, 2017, Reply Comments in Docket No. E017/M-17-152.

Otter Tail believes Minnesota Statute supports the MPUC's authority to recognize the unique situation surrounding the Company's 2017 CIP and allow the inclusion of the LED project's year one budget within the Company's 2017 CIP spending.

As stated in Minnesota Statute § 216B.16 Subd 6c.

Subd. 6c. Incentive plan for energy conservation improvement

(a) The commission may order public utilities to develop and submit for commission approval incentive plans that describe the method of recovery and accounting for utility conservation expenditures and savings.

Otter Tail's proposal is also in alignment with the four objectives the MPUC must consider when approving a plan. Otter Tail has listed the four objectives within Minnesota Statute § 216B.16 Subd 6c, as follows:

- (1) Whether the plan is likely to increase utility investment in cost-effective energy consumption;*
- (2) Whether the plan is compatible with the interest of utility ratepayers and other interested parties;*
- (3) Whether the plan links the incentive to the utility performance in achieving cost-effective conservation; and*
- (4) Whether the plan is in conflict with other provisions of this chapter.*

III. SUMMARY

The Department's May 30, 2018 recommendation for approval to the MPUC is in alignment with Otter Tail's proposal, except for item number two below which has been modified to reflect the discussion in these comments. Otter Tail requests the following items to the MPUC for approval:

1. approve Otter Tail's 2017 CIP tracker account resulting in a December 31, 2017 tracker balance of \$7,362,345;
2. allow the inclusion of the approved LED Street Light project's \$775,483 budget to be included in 2017 CIP spending for the calculation of the financial performance incentive, resulting in an approval of a financial performance incentive of \$2,952,553 for Otter Tail's 2017 CIP achievements;
3. approve a CCRA of \$0.00600 per kWh, to be effective October 1, 2018;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket; and

5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Otter Tail looks forward to reviewing the Department's reply comments regarding item number two above.

Otter Tail is available to answer any questions the Department or MPUC may have.

Dated: June 13, 2018

Respectfully submitted,

OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's 2018 Conservation Cost Recovery Adjustment and 2017 Electric Demand Side Management Financial Incentive Docket No. E017/M-18-119

I, Jana Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf 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
Reply Comments**

Dated this **13th** day of **June, 2018**

/s/ JANA HRDLICKA

Jana Hrdlicka
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