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August 8, 2014



Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of a Commission Inquiry into Decommissioning Policies Related to Depreciation
Docket No. E,G-999/CI-13-626
COMMENTS**

Dear Dr. Haar:

Enclosed for filing in the above-referenced matter are Otter Tail Power Company's ("Otter Tail's") Comments on Decommissioning Policies Related to Depreciation. Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

Thank you for the opportunity to comment on this commission inquiry docket. If you have any questions regarding this filing, please contact me at (218) 739-8659 or at ldemmer@otpc.com.

Sincerely,

/s/ LOYAL DEMMER
Loyal Demmer, CMA
Depreciation Accountant

Enclosures
By electronic filing
c: Service List

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

In the Matter of a Commission
Inquiry into Decommissioning
Policies Related to Depreciation

Docket No. E,G-999/CI-13-626

**OTTER TAIL POWER COMPANY'S
COMMENTS**

I. INTRODUCTION AND BACKGROUND

Otter Tail Power Company (“Otter Tail”) files these Comments in response to the Minnesota Public Utilities Commission’s (“Commission’s”) request for comments issued May 16, 2014 in the Matter of a Commission Inquiry into Decommissioning Policies Related to Depreciation, Docket No. E,G-999/CI-13-626.

II. TOPICS OPEN FOR COMMENT

- a. Provide reasons and descriptions of why the Utility does or does not adjust decommissioning estimates based on expected inflation, and what impact this has on decommissioning estimates over time.**

Otter Tail conducts comprehensive depreciation studies on all of its applicable plant accounts every five years (five-year depreciation studies). In conjunction with these five-year depreciation studies, Otter Tail authorizes decommissioning studies of its electric production facilities. The results from these decommissioning studies serve to provide the estimated final decommissioning cost (net of salvage) which, when incorporated along with expected interim cost of removal (less expected interim salvage proceeds) yield the resulting salvage percentage included for depreciation certification filing purposes for each plant account.

Through this process, Otter Tail does adjust decommissioning estimates based on expected inflation. That is, the current decommissioning study costs in current dollars are projected out to the Average Year of Final Retirement (“AYFR”) dollar values using the current expected inflation rate. These final decommissioning costs are added to the expected interim net salvage costs resulting in the expected total net salvage costs over the plants remaining life. This

expected total net salvage cost is then divided by the plants current surviving plant balance to yield the expected salvage percentage which is included in our annual depreciation certification filings.

Otter Tail believes that including expected inflation rates in decommissioning estimates smooths or evens out the decommissioning accrual over the productive life of the generation facility and provides the most satisfactory result for intergenerational rate equality while offering a higher quality representation of current operating results. Otter Tail believes this method of calculation anticipates more accurately the expected total net salvage costs over the plants productive life and assigns decommissioning accruals more equitably to intergenerational rate payers and to the appropriate accounting periods.

b. Provide the following data, reaching as far back in time as practicable, for each of the utility's plants and units:

- **Annual decommissioning accruals by plant or unit;**
- **The decommissioning estimate used to calculate each annual accrual;**
- **The decommissioning probability used to calculate each accrual.**

Please see Attachment 1 for historic decommissioning accruals for Hoot Lake Plant, Big Stone Plant and Coyote Station reaching back to 1980, the start of such calculations for Otter Tail. Please note that values stated for the Big Stone and Coyote facilities which are jointly owned plants are stated as Otter Tail only values. Also note that the probability utilized for all plants is 100 percent.

The attachment gives each plants beginning depreciable balance for the given year. The stated salvage percent is typical of the overall comprehensive salvage rate for that plant that year. Salvage rates are calculated and approved at each of the plant FERC account levels. The Decommissioning Estimates stated are representative of the plants beginning depreciable balance at the approved salvage percentage and are a summation of each of the plants FERC accounts. Then the annual total system decommissioning accrual is given along with the accumulated decommissioning reserve with a percent decommissioning accrued based on the accumulated decommissioning reserve as compared to the decommissioning estimate. Finally, the Minnesota jurisdiction portion of the annual accrual and accumulated decommissioning balances are provided.

III. CONCLUSION

Otter Tail appreciates the opportunity to provide these additional comments in regard to the Commission Inquiry into Decommissioning Policies Related to Depreciation. Otter Tail looks forward to working with the Commission and other parties to further address this issue through the course of this proceeding.

Dated: August 8, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ LOYAL K. DEMMER

Loyal K. Demmer, CMA
Depreciation Accountant
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Otter Tail Power Company								
Analysis of Historic Annual Decommissioning Accruals by Plant								
Total Company with Minnesota Jurisdiction								
Year End Accumulated Decommissioning Reserve								
Hoot Lake Plant								
Year	Beginning Plant Balance	Salvage %	Decom Estimate	Annual Decom Accrual	Year End Accumulated Decom Reserve	% Decom Accrued	MN Portion Annual Decom Accrual	MN Portion Year End Accumulated Decom Reserve
1980	\$ 28,418,532	-50.0%	\$ 14,209,266	\$ 733,504	\$ 733,504	5.2%	\$ -	\$ -
1981	30,329,782	-50.0%	15,164,891	781,761	1,515,265	10.0%	-	-
1982	29,756,246	-50.0%	14,878,123	830,355	2,345,620	15.8%	1,055,421	1,055,421
1983	29,919,480	-50.0%	14,959,740	806,444	3,152,064	21.1%	398,372	1,453,793
1984	29,654,688	-31.1%	9,222,608	256,544	3,408,608	37.0%	98,857	1,552,649
1985	29,607,473	-31.0%	9,190,160	391,399	3,800,008	41.3%	69,642	1,622,291
1986	29,648,671	-30.9%	9,155,510	385,360	4,185,367	45.7%	68,653	1,690,944
1987	29,678,739	-29.4%	8,734,453	353,187	4,538,554	52.0%	89,270	1,780,214
1988	29,709,020	-30.5%	9,061,251	376,047	4,914,601	54.2%	96,471	1,876,685
1989	29,566,734	-18.10%	5,387,858	46,020	4,960,621	92.1%	96,953	1,973,638
1990	30,043,400	-18.10%	5,474,473	49,407	5,010,027	91.5%	85,625	2,059,263
1991	30,249,988	-18.10%	5,512,120	53,171	5,063,198	91.9%	88,587	2,147,850
1992	33,037,536	-18.10%	6,030,234	50,575	5,113,773	84.8%	56,989	2,204,839
1993	30,660,881	-7.90%	2,415,829	(160,754)	4,953,019	205.0%	(53,155)	2,151,685
1994	36,144,417	-7.90%	2,848,893	(165,964)	4,787,055	168.0%	(29,488)	2,122,197
1995	37,164,972	-7.90%	2,929,219	(164,918)	4,622,136	157.8%	(29,145)	2,093,052
1996	37,325,258	-7.90%	2,941,790	(141,392)	4,480,744	152.3%	(29,028)	2,064,024
1997	37,499,787	-7.90%	2,955,548	(108,221)	4,372,523	147.9%	(31,999)	2,032,025
1998	37,763,411	-7.90%	2,976,366	(106,818)	4,265,705	143.3%	(31,460)	2,000,566
1999	38,181,580	-8.20%	3,130,890	(92,487)	4,173,219	133.3%	(24,019)	1,976,547
2000	38,488,787	-8.10%	3,117,592	(93,415)	4,079,804	130.9%	(30,658)	1,945,889
2001	39,041,741	-8.00%	3,123,339	(88,580)	3,991,224	127.8%	(26,452)	1,919,436
2002	39,469,373	-7.90%	3,118,080	(93,029)	3,898,195	125.0%	(29,155)	1,890,281
2003	39,542,906	-7.80%	3,084,347	(711,013)	3,187,182	103.3%	(31,322)	1,858,959
2004	41,042,536	-10.80%	4,540,322	(68,699)	3,118,483	68.7%	29,745	1,888,704
2005	41,633,783	-10.50%	4,445,775	194,286	3,312,769	74.5%	17,685	1,906,390
2006	43,383,125	-10.30%	4,547,067	122,110	3,434,879	75.5%	(83,272)	1,823,118
2007	45,106,748	-9.9%	4,463,946	(270,310)	3,164,569	70.9%	46,951	1,870,069
2008	46,337,354	-9.1%	4,215,888	50,315	3,214,883	76.3%	36,538	1,906,607
2009	51,886,739	-12.50%	6,479,998	12,834	3,227,717	49.8%	131,689	2,038,296
2010	55,117,970	-11.20%	6,172,292	712,169	3,939,886	63.8%	(74,565)	1,963,731
2011	54,029,878	-10.80%	5,833,282	488,847	4,428,733	75.9%	214,548	2,178,280
2012	55,110,443	-11.20%	6,171,243	117,913	4,546,646	73.7%	76,084	2,254,363
2013	55,267,358	-11.20%	6,188,904	158,317	4,704,963	76.0%	59,438	2,313,801

Notes:

Decom = Decommissioning

Probability Utilized: 100%

Otter Tail Power Company Analysis of Historic Annual Decommissioning Accruals by Plant Total Company with Minnesota Jurisdiction Year End Accumulated Decommissioning Reserve								
Big Stone Plant								
Year	Beginning Plant Balance	Salvage %	Decom Estimate	Annual Decom Accrual	Year End Accumulated Decom Reserve	% Decom Accrued	MN Portion Annual Decom Accrual	MN Portion Year End Accumulated Decom Reserve
1980	\$ 84,224,555	-25.0%	\$21,056,139	\$ 683,606	\$ 683,606	3.2%	\$ -	\$ -
1981	89,888,964	-25.0%	22,472,241	775,094	1,458,700	6.5%	-	-
1982	88,189,163	-25.0%	22,047,291	817,849	2,276,549	10.3%	1,025,110	1,025,110
1983	88,994,079	-25.0%	22,248,520	779,040	3,055,589	13.7%	384,921	1,410,031
1984	89,119,823	-14.9%	13,252,118	317,485	3,373,074	25.5%	117,184	1,527,214
1985	89,217,492	-14.8%	13,230,954	404,715	3,777,790	28.6%	66,459	1,593,673
1986	89,609,055	-14.5%	12,966,430	471,411	4,249,201	32.8%	92,038	1,685,711
1987	107,334,528	-14.0%	14,973,167	447,546	4,696,746	31.4%	100,891	1,786,602
1988	107,213,047	-14.3%	15,331,466	462,364	5,159,110	33.7%	106,498	1,893,100
1989	102,728,524	-7.6%	7,875,935	128,950	5,288,060	67.1%	108,674	2,001,774
1990	102,904,038	-7.6%	7,889,117	123,253	5,411,313	68.6%	100,136	2,101,910
1991	103,029,589	-7.6%	7,898,749	123,733	5,535,046	70.1%	100,807	2,202,716
1992	102,811,760	-7.6%	7,898,864	124,031	5,659,077	71.6%	103,528	2,306,245
1993	103,345,471	-9.7%	9,982,427	197,968	5,857,045	58.7%	143,508	2,449,752
1994	105,273,445	-9.7%	10,106,111	195,340	6,052,385	59.9%	127,275	2,577,028
1995	105,902,827	-9.7%	10,166,335	199,885	6,252,271	61.5%	132,344	2,709,372
1996	106,607,572	-9.7%	7,847,939	(183,317)	6,068,954	77.3%	(33,723)	2,675,649
1997	107,281,867	-9.7%	10,297,186	223,742	6,292,696	61.1%	155,831	2,831,480
1998	106,482,376	-9.7%	10,212,636	219,953	6,512,649	63.8%	153,138	2,984,618
1999	109,725,515	-6.4%	7,022,433	29,881	6,542,530	93.2%	49,242	3,033,860
2000	109,693,847	-6.2%	6,801,019	16,016	6,558,546	96.4%	32,322	3,066,182
2001	109,821,886	-6.2%	6,808,957	16,488	6,575,034	96.6%	35,608	3,101,790
2002	110,875,362	-6.2%	6,874,272	21,055	6,596,089	96.0%	37,063	3,138,853
2003	111,708,475	-6.1%	6,814,217	(34,246)	6,561,843	96.3%	34,720	3,173,573
2004	114,204,765	-4.1%	4,677,545	15,503	6,577,346	140.6%	(43,855)	3,129,717
2005	114,369,156	-4.0%	4,569,847	(241,399)	6,335,948	138.6%	(45,293)	3,084,424
2006	122,816,866	-4.0%	4,907,584	(27,146)	6,308,802	128.6%	(35,027)	3,049,397
2007	122,929,467	-3.7%	4,543,203	(182,285)	6,126,517	134.9%	(42,123)	3,007,273
2008	134,457,264	-3.7%	4,969,723	(205,134)	5,921,383	119.1%	(24,951)	2,982,322
2009	133,643,266	-8.8%	11,741,237	16,413	5,937,796	50.6%	195,755	3,178,077
2010	133,454,736	-8.8%	11,738,586	776,024	6,713,820	57.2%	168,248	3,346,325
2011	133,936,489	-9.0%	12,048,946	387,318	7,101,138	58.9%	146,382	3,492,707
2012	141,947,506	-9.1%	12,912,082	410,322	7,511,461	58.2%	231,700	3,724,407
2013	139,195,737	-8.8%	12,244,053	292,279	7,803,740	63.7%	113,307	3,837,715

Notes:

Decom = Decommissioning

Probability Utilized: 100%

Otter Tail share only

Otter Tail Power Company								
Analysis of Historic Annual Decommissioning Accruals by Plant								
Total Company with Minnesota Jurisdiction								
Year End Accumulated Decommissioning Reserve								
Coyote Station								
Year	Beginning Plant Balance	Salvage %	Decom Estimate	Annual Decom Accrual	Year End Accumulated Decom Reserve	% Decom Accrued	MN Portion Annual Decom Accrual	MN Portion Year End Accumulated Decom Reserve
1980	\$ -		\$ -	\$ -	\$ -		\$ -	\$ -
1981	-		-	630,512	630,512		-	-
1982	134,575,460	-13.0%	17,494,810	461,491	1,092,002	6.2%	491,351	491,351
1983	135,620,864	-13.0%	17,630,712	243,660	1,335,663	7.6%	243,954	735,305
1984	136,542,525	-6.8%	9,312,200	442,638	1,778,301	19.1%	39,000	774,305
1985	135,682,653	-6.8%	9,212,852	234,478	2,012,779	21.8%	15,968	790,273
1986	135,484,805	-6.5%	8,779,415	221,961	2,234,740	25.5%	18,740	809,013
1987	135,272,420	-6.2%	8,440,999	209,855	2,444,595	29.0%	20,195	829,208
1988	135,447,967	-6.3%	8,533,222	210,496	2,655,091	31.1%	21,461	850,669
1989	134,739,502	-2.0%	2,751,800	3,463	2,658,554	96.6%	21,460	872,129
1990	134,934,071	-2.0%	2,755,391	10,483	2,669,036	96.9%	55,039	927,168
1991	135,767,075	-2.0%	2,772,407	4,054	2,673,091	96.4%	19,631	946,799
1992	143,003,662	-2.0%	2,935,360	10,647	2,683,738	91.4%	23,595	970,393
1993	147,158,441	-5.0%	7,352,879	175,340	2,859,078	38.9%	113,710	1,084,103
1994	142,358,913	-5.0%	7,112,842	162,066	3,021,143	42.5%	98,298	1,182,401
1995	142,726,506	-5.0%	7,131,167	163,255	3,184,399	44.7%	100,488	1,282,890
1996	143,029,049	-5.0%	7,146,257	155,170	3,339,568	46.7%	99,822	1,382,711
1997	144,823,308	-5.0%	7,235,967	165,724	3,505,292	48.4%	109,168	1,491,879
1998	145,001,363	-5.0%	7,244,820	166,107	3,671,399	50.7%	108,953	1,600,832
1999	145,180,231	-3.5%	5,081,308	64,576	3,735,976	73.5%	53,461	1,654,292
2000	145,443,962	-3.5%	5,090,539	64,839	3,800,814	74.7%	48,202	1,702,494
2001	145,573,747	-3.4%	4,949,507	57,614	3,858,428	78.0%	46,111	1,748,605
2002	145,847,326	-3.4%	4,958,809	57,928	3,916,356	79.0%	45,741	1,794,346
2003	146,020,613	-3.4%	4,964,701	(613,345)	3,303,011	66.5%	45,822	1,840,167
2004	145,541,817	-1.7%	2,468,782	184,553	3,487,565	141.3%	(25,657)	1,814,510
2005	145,482,506	-1.7%	2,467,615	(185,878)	3,301,686	133.8%	(24,794)	1,789,716
2006	145,544,339	-1.7%	2,469,158	47,428	3,349,115	135.6%	(25,336)	1,764,380
2007	146,458,483	-1.7%	2,484,670	(322,714)	3,026,401	121.8%	(22,354)	1,742,026
2008	146,862,661	-1.6%	2,346,310	(72,043)	2,954,358	125.9%	(25,820)	1,716,206
2009	147,288,454	-5.0%	7,350,671	(76,917)	2,877,441	39.1%	103,707	1,819,913
2010	154,596,091	-5.0%	7,724,367	593,998	3,471,439	44.9%	(89,667)	1,730,246
2011	154,992,478	-4.8%	7,436,000	712,436	4,183,875	56.3%	327,600	2,057,846
2012	155,497,991	-4.9%	7,613,842	151,654	4,335,530	56.9%	91,839	2,149,685
2013	159,796,636	-5.0%	7,984,308	189,381	4,524,911	56.7%	75,570	2,225,255

Notes:

Decom = Decommissioning

Probability Utilized: 100%

Otter Tail share only

Otter Tail Power Company Analysis of Historic Annual Decommissioning Accruals by Plant Total Company with Minnesota Jurisdiction Year End Accumulated Decommissioning Reserve								
Total Otter Tail Power Company								
Year	Beginning Depreciable Plant Balance	Salvage %	Decom Estimate	Annual Decom Accrual	Year End Accumulated Decom Reserve	% Decom Accrued	MN Portion Annual Decom Accrual	MN Portion Year End Accumulated Decom Reserve
1980	\$ 112,643,087	31.3%	\$35,265,405	\$1,417,110	\$ 1,417,110	4.0%	\$ -	\$ -
1981	120,218,746	31.3%	37,637,132	2,187,367	3,604,477	9.6%	-	-
1982	252,520,869	21.6%	54,420,224	2,109,695	5,714,171	10.5%	2,571,882	2,571,882
1983	254,534,423	21.5%	54,838,972	1,829,145	7,543,316	13.8%	1,027,247	3,599,128
1984	255,317,036	12.4%	31,786,926	1,016,667	8,559,984	26.9%	255,040	3,854,168
1985	254,507,618	12.4%	31,633,966	1,030,593	9,590,576	30.3%	152,069	4,006,237
1986	254,742,531	12.1%	30,901,355	1,078,732	10,669,308	34.5%	179,431	4,185,668
1987	272,285,687	11.8%	32,148,619	1,010,587	11,679,895	36.3%	210,356	4,396,024
1988	272,370,034	12.1%	32,925,939	1,048,907	12,728,802	38.7%	224,430	4,620,454
1989	267,034,760	6.0%	16,015,593	178,432	12,907,234	80.6%	227,086	4,847,540
1990	267,881,509	6.0%	16,118,981	183,143	13,090,377	81.2%	240,800	5,088,341
1991	269,046,652	6.0%	16,183,276	180,957	13,271,334	82.0%	209,025	5,297,365
1992	278,852,958	6.0%	16,864,458	185,253	13,456,587	79.8%	184,112	5,481,477
1993	281,164,793	7.0%	19,751,136	212,554	13,669,142	69.2%	204,063	5,685,540
1994	283,776,774	7.1%	20,067,846	191,442	13,860,583	69.1%	196,085	5,881,626
1995	285,794,305	7.1%	20,226,721	198,222	14,058,806	69.5%	203,688	6,085,313
1996	286,961,880	6.3%	17,935,985	(169,540)	13,889,266	77.4%	37,070	6,122,384
1997	289,604,962	7.1%	20,488,701	281,245	14,170,511	69.2%	233,001	6,355,385
1998	289,247,150	7.1%	20,433,822	279,242	14,449,753	70.7%	230,631	6,586,016
1999	293,087,325	5.2%	15,234,631	1,971	14,451,724	94.9%	78,683	6,664,699
2000	293,626,597	5.1%	15,009,149	(12,560)	14,439,164	96.2%	49,866	6,714,565
2001	294,437,373	5.1%	14,881,804	(14,478)	14,424,686	96.9%	55,267	6,769,831
2002	296,192,061	5.0%	14,951,162	(14,046)	14,410,640	96.4%	53,648	6,823,480
2003	297,271,995	5.0%	14,863,265	(1,358,604)	13,052,036	87.8%	49,220	6,872,700
2004	300,789,118	3.9%	11,686,649	131,357	13,183,394	112.8%	(39,768)	6,832,932
2005	301,485,445	3.8%	11,483,238	(232,991)	12,950,403	112.8%	(52,402)	6,780,530
2006	311,744,330	3.8%	11,923,810	142,393	13,092,795	109.8%	(143,636)	6,636,894
2007	314,494,697	3.7%	11,491,820	(775,309)	12,317,487	107.2%	(17,526)	6,619,368
2008	327,657,279	3.5%	11,531,921	(226,862)	12,090,624	104.8%	(14,233)	6,605,135
2009	332,818,460	7.7%	25,571,905	(47,670)	12,042,954	47.1%	431,151	7,036,286
2010	343,168,796	7.5%	25,635,245	2,082,191	14,125,145	55.1%	4,016	7,040,302
2011	342,958,844	7.4%	25,318,229	1,588,601	15,713,746	62.1%	688,531	7,728,833
2012	352,555,939	7.6%	26,697,167	679,890	16,393,636	61.4%	399,623	8,128,456
2013	354,259,730	7.5%	26,417,265	639,978	17,033,614	64.5%	248,315	8,376,772

Notes:

Decom = Decommissioning

Probability Utilized: 100%

Jointly owned plants at Otter Tail share only

CERTIFICATE OF SERVICE

**Re: In the Matter of a Commission Inquiry into Decommissioning Policies Related to Depreciation
Docket No. E,G-999/CI-13-626**

I, Wendi A. Olson, 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 **8th** day of **August 2014**.

/s/ WENDIA. OLSON

Wendi A. Olson
Regulatory Filing Coordinator
Otter Tail Power Company
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(218) 739-8699

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