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September 7, 2018

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

**RE: In the Matter of the Distribution System Planning for Otter Tail Power
Company
Docket No. E017/CI-18-253
Initial Comments**

Dear Mr. Wolf,

Otter Tail Power Company (Otter Tail) respectfully submits its Comments in response to the Commissions June 12, 2018 notice in the above referenced docket. Otter Tail appreciates the opportunity to provide these comments.

If you have any questions regarding this filing, please contact me at 218-739-8565 or at mriewer@otpc.com.

Sincerely,

/s/ MICHAEL RIEWER
Michael Riewer
Manager, Special Projects

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Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Distribution System
Planning for Otter Tail Power Company

Docket No. E017/CI-18-253

**OTTER TAIL POWER COMPANY
Initial Comments**

I. Introduction

Otter Tail Power Company (Otter Tail or the Company) is appreciative of the Commission’s efforts to further the State’s rigor around Integrated Distribution Planning (IDP) while also considering the unique differences between the various electric utilities operating in Minnesota. As has been mentioned before, Otter Tail is comparatively small and very rural in nature, representing mostly smaller rural communities spread out over some 70,000 square miles in three states, which provides its own unique distribution planning challenges. In Minnesota, 90 percent of Otter Tail’s customers reside in communities of less than 1,000 people. In recognition of that uniqueness and the related challenges, the flexibility to allow differing yet similar approaches for Minnesota utilities is critical. The comments below are provided in the context of maintaining value to customers commensurate with costs. The IDP will provide a great venue for utilities to communicate distribution planning to stakeholders especially as distribution spends increase with a focus on Grid Modernization. Otter Tail also believes the biennial nature of the filing frequency is appropriate.

II. Otter Tail Power Company Proposed Distribution Energy Resource Penetration Scenarios Defined under Proposed Requirements; Section C.

Otter Tail proposes to use a baseline and a high DER penetration scenario in the future IDP. The detailed description and rationale for those scenarios is described below. It should be noted that when discussing the impacts of these scenarios, Otter Tail will simply be modeling “net load” to the extent modeling is necessary. Net load would be used as the Company does not have the resources (both technical tools and staffing) necessary to complete in depth, interconnection quality analysis for these scenarios. Otter Tail “net load” represents expected load growth (demand growth for the purposes of the IDP) minus the sum of expected demand impact of energy efficiency programs, demand response programs, and distributed generation penetration. The definition of DER’s as defined in the filing requirements,

“DER is defined as “supply and demand side resources that can be used throughout an electric distribution system to meet energy and reliability needs of customers; can be installed on either the customer or utility side of the electric meter.” This definition for

this filing may include, but is not limited to: distributed generation, energy storage, electric vehicles (EV), demand side management, and energy efficiency (EE)”

Otter Tail’s baseline demand growth is expected to be around 0.92 percent over the next 15 years. This percentage is based on the Company’s most recent demand forecast created in January of 2018, which is projecting a downward trend in its load growth factor notwithstanding the Company’s last Integrated Resource Plan filing, Docket No. E017/RP-16-386, the projected demand growth was 1.25 percent. The decline in the demand growth factor is consistent with the trends seen in the Company’s sales forecast and is caused namely by slower economic growth and an increase in energy efficiency programs.

In addition, we expect to continue to see customer energy efficiency projects impacting energy sales and consequently coincident demand. In recent years, Otter Tail has achieved remarkably high energy savings from partnering with customers and implementing projects through the Conservation Improvement Program (CIP). While the Company did achieve 2.75 percent energy savings as compared to Company sales in 2016, and a record setting 3.01 percent in 2017, the Company is cautiously optimistic where future energy savings will come from. Most short-term payback projects have now been completed by customers leaving less opportunity for simpler energy savings projects looking forward. CIP projects will likely become more complex, require more spending, and require a longer payback for customers. These factors paired with changing lighting and energy code standards may significantly impact energy and demand savings from CIP projects in the future.

Currently the Minnesota Department of Commerce’s Division of Energy Resources has hired a consultant to perform a Demand-Side Management (DSM) potential study. This study will perform an in-depth assessment across the entire state to identify what potential for electric energy efficiency exists in each area of the state. Results from the study are scheduled to be released in fall of 2018. In Otter Tail’s latest approved Integrated Resource Plan, docket no. E017-RP-16-386, the Company included 1.6 percent annual energy savings from 2017-2031. Otter Tail believes the 1.6 percent forecast is most reasonable at this time until further recommendations from the DSM potential study are released. With the prior two paragraphs as background, when Otter Tail models DSM and Energy Efficiency within Strategist models (IRP forecasting tool), the results show around a 0.90 percent coincident impact to demand.

In addition to energy and demand savings from CIP projects, Otter Tail actively promotes its robust demand response portfolio. Currently Otter Tail has about one-third of customers participating in DR program which shift customer’s load from peak periods to non-peak periods. The Company’s DR rate offerings and customer rebates for installation of the associated equipment encourage wide-spread participation in DR. By shifting load to non-peak periods Otter Tail can avoid purchasing energy at high prices and lowers the Company’s capacity reserve requirements in MISO. Currently Otter Tail has about 20 MW of summer load which is accredited in MISO. The savings from these programs is reflected in historical demand numbers which in turn is already accounted for in future load growth projections.

Regarding Electric Vehicles (EVs), Otter Tail does not expect to see significant penetration over the next 10-15 years for electric vehicles. Currently Otter Tail assumes a baseline electric vehicle penetration of less than 0.1 percent in its service territory. Based on projections from the United States Energy Information Administration and other modeling, Otter Tail estimates a high scenario for penetration in its service territory of 2.6 percent (6.2 MWs of non-coincident demand) in 2025, 5.3 percent (12.6 MWs of non-coincident demand) in 2030, and 6.8 (15.8 MWs of non-coincident demand) percent in 2035. It is likely that Otter Tail will see less penetration than this forecast due to the rural nature of its large service territory. Legislative and regulatory policies over this time frame can significantly change these projections. From high level reviews, Otter Tail estimates 25 percent of the non-coincident load from EVs to align with the coincident peak. For our baseline scenario, we propose to utilize 0.03 percent increase in annual demand due to EVs. This is based on our EIA “high penetration” EV scenario modeling in which we expect to see 1.6 MWs of coincident demand across the entire system by 2025, which is largely negligible in the overall scheme of growth for Minnesota planning. For the high penetration EV scenario within the IDP, Otter Tail proposes to utilize a 0.15 percent annual increase which is simply just five times the amount of EV growth we expect from our high EIA estimates. This range is simply provided to give at some separation between the two scenarios.

Over the last five years, Otter Tail has averaged six distributed generation interconnections annually to our distribution system in Minnesota. These equate to approximately 68 kW nameplate of new installed distribution generation each year in Minnesota. Otter Tail does not measure demand for these units to know the exact effect of these units on demand growth. In a sense, these are simply netted into load. This has been appropriate and cost effective with such low penetration. If these units were assumed to be at a 20 percent capacity factor, this would equate to around 14 kW of demand reduction annually off on-peak demand. For the purposes of the IDP, we can assume these to be negligible. It could also be argued that historical trends for distributed generation are included within the demand growth baseline estimates as these small number of units are netted into load forecasts. For these reasons, our baseline estimate is proposed to be a zero percent net affect to demand growth. For our high penetration estimate, we have assumed the number or request and amount of generation will triple and thus assume an 0.2 percent effect on annual demand growth.

Table 1 below summarizes the various inputs into our two recommended scenario forecasts.

Table 1

DER Component	Baseline Scenario	High DER Penetration Future
Demand Growth	+0.92%	+1.0%
Energy Efficiency and Demand Response Effect on Demand	-0.90%	-1.5%
Electric Vehicle Adoption Effect on Demand	0% (Negligible)	+0.15%
Distributed Generation Effect on Demand	0% (Negligible)	-0.2%
TOTAL Annual Net Load Modeled	+0%	-0.55%

Table 1 – Scenario Summary

Otter Tail proposes to only discuss these two scenarios in the first IDP which is a variance from the initial draft requirement to discuss a baseline, high, and medium scenarios. The proposal for two scenarios is to provide meaningful separation between each. As provided in Table 1, the data for a baseline and high scenario provides enough meaningful separation between scenarios. These two scenarios vs the proposed three help to avoid placing an undue burden on limited resources while providing only limited value or insight into the scenario sensitivity and projections.

Otter Tail would also like to note the percentages shown in Table 1 represent system averages for MN. There are areas of the system where load growth is of course more than average, as well as less than average of those values shown. Because of this variance, Otter Tail uses sensitivities for load growth as necessary during actual distribution studies. In addition, the forecasts do not have a way to account for large, unknown/unplanned, industrial spot loads which could adjust the percentages shown as well. However, those loads are typically connected at a transmission level and would not affect distribution planning.

III. Additional Otter Tail Proposed edits to IDP Requirements:

A. Section C.2 Continued:

As previously identified, the proposed requirements recommend three scenarios within section C; baseline, medium and high DER penetration levels. As touched upon, above, Otter Tail proposes to only discuss a high penetration future in comparison to the baseline level scenario. One reason is our high penetration projection for the next 10 years is lower than the medium level stated within the draft requirements. The other reason is that all current indicators and data is statistically insignificant and would not provide a substantial (or meaningful) difference in our discussion on the system impacts between the medium and high penetration analysis. The inclusion of future scenarios could be a topic to revisit in

future IDPs, but it is our recommendation for this first IDP to only include a baseline and high penetration future.

B. Section D:

Otter Tail proposes under section D to move from the required 15-year long term plan to a 10-year long term plan. The company's current process covers a 5-year plan. The company completes a five-year plan largely due to resource constraints, insignificant load growth, and for all practicality, a five-year plan has provided a reasonable outlook based on historic trends. Consequently, a 10-year plan provides for a reasonable incremental change to current processes vs the proposed 15-year plan. For now, due to historic data, resource considerations, and the practical reality noted above, the company proposes to make a step change from a five-year plan to a 10-year plan and evaluate for further step changes in the future.

C. Section A.19:

First, Otter Tail assumes section A.19 is purely related to capital spends. Otter Tail capital budgeting categories for distribution spend are somewhat aligned with the current IDP proposal. To better align the categories to OTP's long-standing processes that are currently built into its capital budgeting process, Otter Tail requests that the Commission kindly consider the following five categories for Otter Tail:

1. New Load & Reliability:

- This category largely encompasses the proposed categories of b), c), and d). Otter Tail does not currently delineate and track the various drivers described in the proposed requirements b), c), and d). However, our identification of New Load & Reliability appropriately captures the intent and would align with the proposed requirements b) – d).

2. Replace:

- Presently, our category of "replace" aligns with the Commission's proposed category a) Age-Related Replacement & Asset Renewal. While it would be less intrusive in our existing processes to continue to utilize "Replace," if the Commission prefers, we could modify our system to adopt the terminology "Age-Related Replacement & Asset Renewal."

3. Relocate:

- Presently, our category of "relocate" aligns with the Commission's proposed category f. Government Mandates. While it would be less intrusive in our existing processes to continue to utilize "Relocate," if the Commission prefers, we could modify our system to adopt the terminology "Government Mandates."

4. Metering:

- Otter Tail has a budget category for metering and can track this category as is.

5. For the category e. Grid Modernization and Pilot Projects:

- Otter Tail does not have this category currently but could review the capital budget each year for projects that may fit this type of definition. It would be helpful for the Commission to provide examples of these types of projects unless it is deemed appropriate to leave that decision up to each utility. Otter Tail is amenable with either approach, but we'd value if the Commission would provide examples or definitions of these projects to facilitate better consistency and alignment between the MN utilities.

D. Section A.21:

Under A.21, Otter Tail respectfully proposes a threshold of \$250,000 and above to report these added details for capital distribution projects. Otter Tail's current process requires added internal project review for projects of \$250,000 or greater. Therefore, a \$250,000 threshold would align well with Otter Tail's existing processes.

E. Sections A16, A17, A18 and A23:

A few of the requirements related to System Data and DER Deployment are already submitted under Docket No. CI-01-1023. Specifically, parts A16, A17, A18, A23, are already submitted under the docket to our understanding. Otter Tail proposes these be removed from requirements under the IDP or Docket No. CI-01-1023 to avoid duplication of like information in multiple reports.

F. Points of Clarification:

Otter Tail is communicating the following items to ensure expectations are met during the first distribution plan submittal.

As the Commission is aware, Otter Tail's 41.6 kV network is appropriately classified as transmission per the Commission's guidelines and as discussed thoroughly in prior rate cases. Therefore, the 41.6 kV network analysis and planning are covered under the MN Biennial plan and will not be discussed in the IDP. However, there are items within the plan requirements where 115/41.6 kV information will be provided because distribution (41.6/12.5 kV) information is not measured. For example, under draft requirement 3.A.9, Otter Tail will provide measurements where they exist which may be on the distribution system or transmission system as described above.

Within section 3.A Financials, non-traditional distribution projects require specific attention. Otter Tail would find it valuable for a definition of non-traditional to be provided to utilities. This will ensure expectations are met regarding these projects.

Under section 3A15, Otter Tail does not currently track costs associated with DER generation installations. This requirement would require documentation, process, and tracking changes within Otter Tail. Considering the relatively small number of installations to date, there has not been a justifiable driver to make such changes for tracking and the present status of not tracking has been appropriate. Costs for installing company provided demand response equipment can be estimated but it appears from the requirement that this is aimed at more distributed generation applications. While Otter Tail cannot currently meet this requirement because such processes/tracking/system changes have not been implemented, on a forward basis we can consider making such changes if so requested by the Commission. Alternatively, we can monitor the amounts of distributed generation and if requests increase to a more meaningful amount, we could implement the change at that time.

IV. CONCLUSION

In summary, Otter Tail looks forward to further discussions on IDP requirements and the future of distribution planning within the state. Otter Tail is appreciative of the opportunity to provide feedback on the proposed requirements and the flexibility the proposed requirements give each utility within Minnesota.

Dated: September 7, 2018

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ MICHAEL RIEWER

Michael Riewer
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CERTIFICATE OF SERVICE

**RE: In the Matter of the Distribution System Planning for Otter Tail Power Company
Docket No. E017/CI-18-253**

I, Jana Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Mr. 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
Initial Comments**

Dated this **7th** day of **September 2018**

/s/ JANA HRDLICKA

Jana Hrdlicka, Regulatory Filing Coordinator
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