

August 1, 2018

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-18-119

Dear Mr. Wolf:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) to Otter Tail Power Company's Reply Comments in the following matter:

A Request by Otter Tail Power Company (OTP) of the Company's Annual Filing of the Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider (Petition).

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** OTP's Petition with modifications. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-18-119

I. BACKGROUND

On March 30, 2018, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its annual Conservation Improvement Program (CIP) filing (Petition) for 2017 with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/M-18-119. The Petition contained a request for the Commission to permit the Company to carry forward net benefits from 2017 to 2018, for purposes of calculating the financial incentive. The Department submitted Comments on May 30, 2018 (Department's May 30th Comments). In response to the Company's proposal to carry forward net benefits, the Department concluded that the Commission should first determine whether it has the authority to do so. Assuming that the Commission has authority over OTP's request to carry forward net benefits for purposes of the financial incentive, the Department recommended that the Commission deny the Company's request.

Otter Tail submitted Reply Comments on June 13, 2018 (OTP's June 13th Reply Comments) modifying its proposal. Rather than requesting that the Commission approve the carry-forward of net benefits from 2017 to 2018, the Company instead requested that the Commission approve the Company's 2017 budgeted expenditures of \$775,483 for its Company-Owned Street and Area LED Lighting Program (LED Program),¹ rather than the Company's actual 2017 LED Program expenditures of \$0, for purposes of calculating the financial incentive. In other words, the 40%-of-CIP-expenditures cap limiting the financial incentive would be calculated based on actual CIP expenditures plus the budgeted, but not yet incurred, costs for the LED Program. Otter Tail appeared only to propose including the budgeted spend for purposes of calculating the financial incentive, and not to recover the budgeted expenses until expenditures are actually incurred.

The Department submitted Reply Comments July 3rd, 2018 (Department's July 3rd Reply Comments). In response to the Company's proposal to count budgeted rather than actual expenditures, the Department concluded that the Commission may have authority to grant or deny this request, as the Company's proposal appears to relate solely to the financial incentive. However, since Minnesota Statutes do not explicitly address this situation, the Department

¹ See Docket No. E017/M-17-152.

concluded that the Commission first needs to determine whether it has authority to shift a portion of Commerce Commissioner-approved CIP expenses to a different year for purposes of calculating the cap on a utility's financial incentive.

However, even though the Department agreed with the Company that the Commission may have authority to use budgeted rather than actual expenditures for purposes of counting the financial incentive, the Department recommended that the Commission not do so. The Department determined that the proposal did not meet the requirements of Minnesota Statute § 216B.16 subd. 6c, which outlines the factors the Commission must consider when approving incentive plans. The Department supported its conclusion by pointing out that: Otter Tail Power's proposal would not increase investment in cost-effective savings because the Company would continue the program even if its proposal were denied; Otter Tail Power's proposal would not be in the interest of utility ratepayers and other parties because it would increase ratepayer costs without providing additional value in the form of conservation, and; the plan does not link the incentive to the utility's performance in achieving cost-effective conservation because Otter Tail did not save any energy from the LED program in 2017 yet proposes to be compensated as if it had. The Department did note, however, that the proposal does not appear to be in conflict with any other provisions of that chapter of Minnesota Statutes.

In addition, the Department recommended that the Commission not permit the Company to count two specific costs of the LED program towards the financial incentive expenditure cap: the CIP Rebate or the Rate of Return on the New Lights.

Otter Tail submitted Response Comments on July 13, 2018 (OTP's July 13th Response Comments). In those comments, Otter Tail submitted a slightly altered proposal from its June 13th Reply Comments. In the new proposal, Otter Tail still proposed to count budgeted rather than actual expenditures towards the financial incentive expenditure cap for 2017. Then, in years 2018-2021, only actual expenditures will be counted towards the financial incentive. Finally, in year 2022, the Company proposed not to include any LED program expenditures towards the financial incentive. By counting budgeted expenditures in 2017 and no expenditures in 2022, the Company estimated that it would actually count approximately \$141,688 less in CIP expenditures towards the financial incentive expenditure cap overall, but would earn everything one year sooner than it would otherwise. Again, this proposal is only for purposes of calculating the expenditure cap; the Company would record actual CIP expenditures in the CIP tracker when they were incurred.

II. DEPARTMENT ANALYSIS

For years the Department has worked with other parties and the Commission to design a DSM financial incentive mechanism that is not subject to gaming by the utilities. In this docket the Department has responded to Otter Tail's many proposals asking the Commission to change the

established rules so that it may receive a higher incentive. The Department continues to recommend that the Commission reject Otter Tail's requests, including this most recent request. Otter Tail's proposal to require ratepayers to pay Otter Tail a financial incentive for expenditures that Otter Tail did not make is not reasonable. In addition, it would be complicated to implement Otter Tail's proposed hybrid of using budgeted/actual expenditures to determine the financial incentives over time, such as tying out how budgeted amounts compare to actual amounts and preventing double-counting of budgeted and actual expenditures.

The Department also notes that the proposal in OTP's July 13th Response Comments is not materially different from the proposal raised in OTP's June 13th Reply Comments; both proposals are based on the Commission allowing budgeted rather than actual CIP expenditures to count towards the financial incentive expenditure cap. Therefore, the Department's analysis of Otter Tail's proposal based on the financial incentive plan evaluation criteria in Minnesota Statute § 216B.16 subd. 6c, presented in the Department's July 3rd Reply Comments, still applies. The Department again concludes that the Company's proposal does not meet the statutory requirements, and again recommends that the Commission deny the Company's proposal.

The Company commented on the Department's recommendation for the Commission not to permit either the LED CIP Rebate or the Return on Incremental Costs of New Lights in the calculation of the expenditure cap. The Company agreed that including the Return is inappropriate, but argued in favor of including the CIP Rebate towards the expenditure cap. The Company argued on page 6 of its July 13th Response Comments that the CIP Rebate "paid to the public utility reduces capital investment upfront thereby reducing the public utility's potential rate base. The public utility accepts the rebate and forgoes the rate base investment, receiving no return on the investment/rate base going forward." In other words, OTP argues that the CIP Rebate is a lost opportunity for the Company to earn a rate of return on a CIP investment, since the CIP Rebate is deducted from Rate Base, Otter Tail is forgoing the return associated with Rate Base, and thus should be permitted to count these costs towards the expenditure cap.

The Company confirmed with the Department via phone and email that Company procedures would ensure that the CIP Rebate will indeed be deducted from Rate Base. However, Otter Tail will earn a rate of return on the full, incremental costs of the LED lights through the CIP rider.² Thus, the Company's statement that accepting the rebate would result in OTP "receiving no return on the investment/rate base going forward" is not accurate.

² The Commission's December 13, 2017 Order in Docket No. E-017/M-17-152 allowed the Company to earn a rate of return on the incremental capital costs for LED lights through the CIP Rider, in addition to Otter Tail's recovery of a return on lighting reflected in base rates.

Moreover, the Department notes that although the Company presents itself as being financially hurt by OTP's decision to earn a CIP Rebate rather than recover this portion of capital costs in its next rate case along with other LED capital costs, there are advantages for the Company to recover that money in the form of a CIP Rebate rather than in the Company's subsequent rate case. Under the current proposal, the Company would be permitted to recover a full \$892,860 in CIP Rebates over a five year period, rather than waiting to recover that portion of the capital costs of the LED lights over the long lives of the LED lights.

Nonetheless, while the Department is not persuaded by OTP's arguments, the Department no longer opposes inclusion of the actual CIP Rebates in the financial incentive expenditure cap. The actual CIP Rebates essentially reflect a CIP expense (in simple terms, the CIP Rebates represent the depreciation that would have been charged to ratepayers over time for that portion of capital costs). Thus, consistent with the Department's recommendation above regarding actual expenditures, the Department recommends that the Commission allow Otter Tail to count actual CIP Rebates toward the financial incentive expenditure cap.

Therefore, the Department continues to recommend that the Commission:

1. approve Otter Tail's 2017 CIP tracker account, as summarized in Table 1 on page 9 of the Department's May 30, 2018 Comments, resulting in a December 31, 2017 tracker balance of \$7,362,345;
2. approve a Shared Savings financial 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, or the first day of the month following the Commission's Order in this matter;
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.

In addition, the Department recommends that the Commission deny OTP's proposal to count budgeted, in addition to actual, CIP expenditures when calculating the financial incentive cap, and instead allow only actual CIP expenditures and actual CIP Rebates toward the cap.

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
Response Comments**

Docket No. E017/M-18-119

Dated this 1st day of August 2018

/s/Sharon Ferguson

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