

December 15, 2025

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

RE: Amended Supplemental Comments of the Minnesota Department of Commerce
Docket No. E017/M-25-30

Dear Ms. Bergman:

Attached are the amended supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

OTTER TAIL POWER COMPANY'S 2024 ANNUAL SAFETY, RELIABILITY AND SERVICE QUALITY REPORT AND PROPOSED SAIFI, SAIDI, AND CAIDI RELIABILITY STANDARDS FOR 2025.

Otter Tail Power Company (Otter Tail, OTP or the Company) filed its Petition on April 1, 2025. Followed by first Supplemental Comments on June 10, Reply Comments on July 25, and second Supplemental Comments on November 3. On November 24, the Company submitted a Supplemental Amendment Filing, which included the Institute of Electronic and Electrical Engineers (IEEE) 2024 reliability results for its member utilities. The Department addresses that new information from IEEE in these comments.

The Department recommends the Minnesota Public Utilities Commission (Commission):

- Accept the Company's 2024 Safety, Reliability, and Service Quality (SRSQ) Report.
- Set the 2025 statewide and work center reliability standards at the Institute of Electrical and Electronic Engineers (IEEE) benchmarking 2nd quartile for medium utilities.
- Set the benchmark for OTP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP's statewide system against IEEE's medium-sized utilities' data and OTP's work centers against IEEE's small-sized utilities data.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

LB/JK/ad
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-30

I. INTRODUCTION

On April 1, 2025, Otter Tail Power Company (Otter Tail, OTP, or the Company) filed its 2024 Annual Safety, Reliability, and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E017/M-25-30, in accordance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826, along with its proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024.

On June 10, 2025, OTP filed supplemental comments addressing the additional compliance requirements in the Commission's January 28, 2020, Order in Docket No. E017/M-19-260.

The Department filed its initial comments on July 11, 2025, which included preliminary recommendations and a request for OTP to provide additional information in a supplemental filing.

OTP filed reply comments on July 25, 2025, and its second Supplemental Comments on November 3, 2025. The Department subsequently filed supplemental comments on November 6, 2025.

On November 24, 2025, OTP filed a Supplemental Amendment Filing which included the Institute of Electronic and Electrical Engineers (IEEE) 2024 reliability results for its member utilities.

II. PROCEDURAL BACKGROUND

April 1, 2025	Otter Tail filed a petition for approval of the 2024 SRSQ Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2025.
April 30, 2025	The Commission issued a notice of comment period for the Report.
June 10, 2025	Otter Tail filed supplemental comments.
July 11, 2025	The Department filed initial comments.
July 18, 2025	The Commission filed an Ex Parte Communication.
July 25, 2025	Otter Tail filed reply comments.
November 3, 2025	Otter Tail filed second set of supplemental comments.
November 6, 2025	The Department filed supplemental comments.
November 24, 2025	Otter Tail filed an IEEE Supplemental Amendment.

III. DEPARTMENT ANALYSIS

Under the Commission’s current process, the reliability benchmarking information for Otter Tail for 2025 is derived from IEEE’s second quartile 2024 results.

A. IEEE BENCHMARK YEAR 2025 RESULTS FOR 2024 DATA

The Amended Supplemental Filing provides the IEEE 2024 benchmarking data which is summarized with OTP’s reliability performance data in Table 1.

Table 1: OTP 2024 Reliability Performance vs IEEE Benchmark¹

Work Center	Metric	2024 IEEE Benchmark	2024 OTP Performance	Met Benchmark?
Bemidji	SAIDI	150	114.77	Yes
	SAIFI	1.15	1.05	Yes
	CAIDI	128	109.75	Yes
Crookston	SAIDI	150	108.2	Yes
	SAIFI	1.15	0.81	Yes
	CAIDI	128	133.73	No
Fergus Falls	SAIDI	150	220.37	No
	SAIFI	1.15	1.57	No
	CAIDI	128	140.44	No
Morris	SAIDI	150	108.74	Yes
	SAIFI	1.15	0.8	Yes
	CAIDI	128	135.72	No
All MN Customers	SAIDI	150	141.55	Yes
	SAIFI	1.15	1.16	No
	CAIDI	128	122.22	Yes

In 2024, Otter Tail reported its first full year of data from its new Outage Management System, implemented in December 2022. The Company met seven of its twelve work-center goals and two of its three statewide goals. SAIFI benchmarks were met for all but one work center (Fergus Falls), reflecting improvement over recent system-wide performance. SAIDI benchmarks were similarly met except at Fergus Falls. The Company attributed the Fergus Falls performance decline to several widespread storms and a significant equipment failure.²

The decline in Fergus Falls in 2024 was linked to three events:³

¹ In the Matter of Otter Tail Power’s 2024 Annual Safety, Reliability, and Service Quality Report, Supplemental Amendment Filing, November 24, 2025, Docket No.E017/M-25-30 (eDocket [202511-22531-01](#) at 2-3.

² Petition at 3.

³ *Ibid.*

- **Mid-July Summer Storm (July 13-14, 2024):** Affected 19 feeders, primarily in Ottertail City, Perham, Rush Lake, Parkers Prairie, and Elizabeth/Carlisle. The storm caused 1,047,374 customer-minutes of interruption across 2,881 customers, averaging 315 minutes per customer.
- **Late Summer Wind Event (July 31, 2024):** Wind gusts up to 91 MPH caused 218,445 customer-minutes of interruption across 2,219 customers, averaging 91 minutes per customer. The Fergus Falls Buse NW feeder was most affected (1,337 customers, 82,000 customer-minutes). Other impacted feeders included all Freazee feeders (North, South, and Rural), Wendell, Elbow Lake, Elizabeth/Carlisle, and Perham.
- **Fergus Falls Buse St. Substation Outage (December 18, 2024):** An overhead splice failure caused a 175-minute outage and affecting 2,172 customers, totaling 380,100 minutes without power.

At the statewide level, the system did not meet its SAIFI goal, primarily due to the performance results within the Fergus Falls work center as described above⁴

Based on the 2024 reliability data, Fergus Falls experienced an unusually challenging year due to a combination of severe weather events and a material equipment failure. While these events led to the work center missing SAIFI and SAIDI benchmarks, they were largely isolated and outside the company's reasonable control. System-wide performance remains strong, with all the other work centers meeting reliability benchmarks.

Given this context, the Department recommends the Commission approve the Company's 2024 Service Reliability report, recognizing that the Fergus Falls performance represents an anomaly rather than a systemic issue. Continued monitoring and the implementation of lessons learned from these events should help prevent similar occurrences in the future.

B. Proposed 2025 Benchmark: IEEE Five-Year Average with One-year Lag

As discussed in the Department's initial comments, the Department recommended benchmarking OTP's 2025 performance against the five-year average of IEEE results from 2020–2024, using medium-sized utility data for the statewide system and small-sized utility data for work centers, with a one-year lag. Accordingly, OTP's 2025 performance would be measured against IEEE's 2021–2025 results, reflecting 2020–2024 data.⁵

The Department also continues to recommend that if IEEE does not report utility-sized response results in the future, the IEEE overall results for that year be used instead of the (unavailable) utility-sized results for the five-year average benchmark calculation.⁶

⁴ *Ibid.*

⁵ This would allow OTP to include a comparison of its prior year reliability results without having to wait for information from IEEE. This change would also accelerate the approval process.

⁶ See *In the Matter of OTP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Supplemental Comments, October 15, 2024, Docket No. E017/M-24-30 (eDockets: [202410-210977-01](#)) at 1.

The Department also recognizes that the Commission’s current process for determining the appropriate benchmarks for the Company’s prior year’s reliability performance results and setting OTP’s 2025 (following year’s) proposed benchmarks is different from these two Department recommendations. The Department forwarded those recommendations under the assumption that the Commission might prefer a process for determining the current year’s reliability benchmarks using readily available information rather waiting for IEEE to complete the analysis that separates the annual reliability performance results by utility-size. The Department’s recommended system benchmark would likely increase the administrative efficiency of the review process.

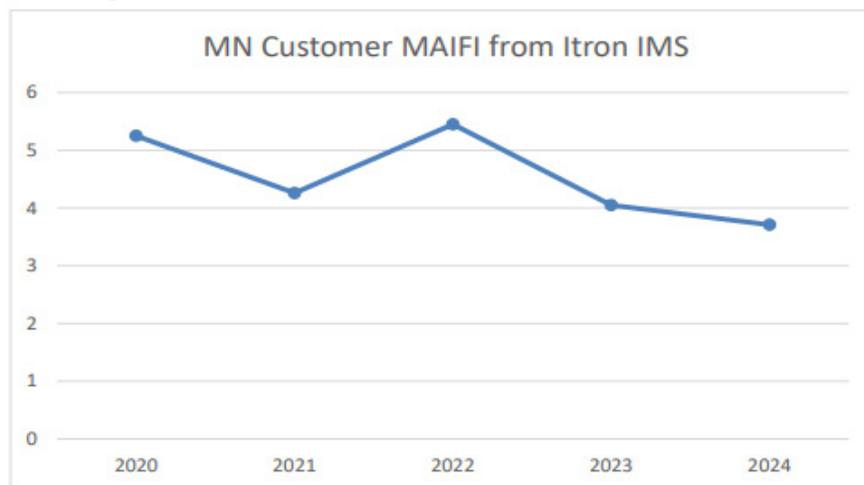
If the Commission prefers to continue using its current approach, that being comparing OTP’s 2024 reliability performance to the 2024 reliability performance of the medium or small-sized utilities included in the IEEE’s analysis, the Department supports that approach as well.

C. LIMITATIONS OF IEEE DATA – MAIFI PERFORMANCE BY CUSTOMER CLASS

The Commission’s January 28, 2020, Order in Docket No. E017/M-19-260 included Attachment B: Updated Annual Reporting Requirements.⁷ Attachment B’s item 11 requires reporting on performance by customer class for ASAI, SAIDI, SAIFI, CAIDI, and MAIFI⁸. OTP stated in its Petition that it would provide this information in its filing reporting IEEE’s 2024 Reliability Information.⁹

The Company indicated that MAIFI is the only metric still gathered using the Interruption Monitoring System (IMS), but this system will be replaced by their new Landis + GYR AMI (Advanced Metering Infrastructure) system beginning in 2025 and in all future reporting.¹⁰

Figure 1 – Non-normalized Minnesota Historic MAIFI¹¹



⁷ *In the Matter of Otter Tail Power’s 2018 Annual Safety, Reliability, and Service Quality Report*, PUC Order, January 28, 2020, Docket No.E017/M-19-260 (eDockets: [20014-151593-01](#)) ([2020 OTP SRSQ Order](#)).

⁸ *Id.*

⁹ Petition at 44.

¹⁰ *In the Matter of Otter Tail Power’s 2024 Annual Safety, Reliability, and Service Quality Report*, Supplemental Amendment Filing, April 1, 2025, Docket No.E017/M-25-30 (eDocket [20254-217089-01](#) at 6.

¹¹ *Ibid.*

Over the past four years, the Company’s MAIFI results have declined, indicating a meaningful reduction in the frequency of momentary interruptions experienced by customers. This downward trend reflects improved system performance. Lower MAIFI values are a positive development for all customer classes because fewer momentary interruptions reduce wear on sensitive equipment, improve power quality, and enhance overall customer satisfaction. Taken together, the multi-year improvement in MAIFI demonstrates that the Company’s reliability initiatives are delivering tangible benefits.

Table 2: Normalized MAIFI by Customer Service Center collected from Itron IMS¹²

CSC 2024	MAIFI
Bemidji	3.21
Crookston	4.86
Fergus Falls	3.76
Morris	3.26
MN Total	3.7

The Department concludes that the Company has complied with the Commission’s January 28, 2020, Order in Docket No. E017/M-19-260 by submitting the required performance by customer class for MAIFI, as well as for ASAI, SAIDI, SAIFI, CAIDI.

IV. DEPARTMENT RECOMMENDATIONS

- Accept Otter Tail’s 2024 SRSQ report.
- Set the 2025 statewide and work center reliability standards at the Institute of Electrical and Electronic Engineers (IEEE) benchmarking 2nd quartile for medium utilities.
- Recommends setting the benchmarking of OTP’s 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP’s statewide system against IEEE’s medium-sized utilities’ data and OTP’s work centers against IEEE’s small-sized utilities data if the Commission prefers to modify the current process for setting OTP’s annual reliability goals.

¹² *In the Matter of Otter Tail Power’s 2024 Annual Safety, Reliability, and Service Quality Report*, Supplemental Amendment Filing, April 1, 2025, Docket No.E017/M-25-30 (eDocket [20254-217089-01](#) at 7.

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
Supplemental Comments**

Docket No. E017/M-25-30

Dated this 15th day of **December 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
3	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Official 25-30
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-30
6	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-30
8	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 25-30
9	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
10	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
11	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-30
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
13	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
15	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
16	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-30
17	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
18	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30