

March 3, 2016

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

**RE: NOTICE OF COMMENT PERIOD Issued: February 26, 2016 In the Matter of the
Complaint by PKM Electric Cooperative, Inc. Against Otter Tail Power**
Docket No. E131,E017/C-15-176
Docket No. E999/CI-12-957

Dear Mr. Wolf:

The above-referenced Notice requested Comments on the following by 4:30 pm on March 7, 2016:

- Should the Commission grant the parties' request for dismissal?
- Any other issues or concerns related to the parties' request?

As stated in its February 3, 2016 letter to the Honorable James Mortenson:

The Department has reviewed the Settlement Agreement and believes that:

- Paragraph 4 – Service-by-Exception;
- Paragraph 5 – Recording;
- Attachment 2 – Map of Original Site and New Site; and
- Attachment 3 – Map of Area Containing Other Possible Donaldson Sites

provide information that adequately address the issues presented in this proceeding.

The Department supports approval of the parties' Settlement Agreement by the Commission and revision of the Commission's service territory maps to reflect the written service-by-exception in the Settlement Agreement.

Regarding the Commission's inquiry as to other issues or concerns, the Department notes a general concern that the Commission's digital electric service area maps likely are inaccurate with respect to Otter Tail Power (Otter Tail) service and possibly that of many other electric utilities. During the course of its investigation in this proceeding, the Department became aware that Otter Tail provides electrical service to more than 400 customers located in the assigned service territories of other utilities (see Attachment 1 for

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Public Version of Otter Tail's response to DOC Information Request No. 15). The Department also was informed that other utilities provide electrical service to approximately 150 customers within Otter Tail's assigned service territory. It is the Department's understanding that few, if any, of the identified instances have service-by-exception agreements.

The Commission has made concerted attempts, through its Orders dated December 3, 2012 and April 9, 2014 in Docket No. E999/CI-12-957, and Reminders dated April 11, 2013, November 7, 2014 and December 16, 2015, to correct its digital service area map to reflect utilities' obligations to serve customers within particular areas of the state. Otter Tail has not fully informed the Commission regarding customers the Company serves by exception, whether formal exception agreements exist or not and irrespective of whether such agreements have been approved by the Commission.

The Department recommends the Commission take whatever action it considers appropriate to ensure that the official electric utility service area maps accurately reflect electric utilities' obligations to serve particular areas in Minnesota.

Sincerely,

/s/ DALE V. LUSTI
Financial Analyst

DVL/lt

PUBLIC DOCUMENT - TRADE SECRET DATA EXCISED
Response to Information Request MN-DOC-15
Page 1 of 2

OTTER TAIL POWER COMPANY
Docket No: E131, E017/C-15-176

Response to: MN Department of Commerce DER

Analyst: Dale V. Lusti

Date Received: 04/21/2015

Date Due: 05/01/2015

Date of Response: 06/09/2015

Responding Witness: Peter J. Beithon, Manager, Regulatory Recovery - (218) 739-8607

Information Request:

Otter Tail Power Company (Otter Tail) March 6, 2015 Comments

On Page 6 of its March 6, 2015 Comments in this proceeding, Otter Tail states:

The absence of a notation or marking of OTP's service to the Donaldson Facility in the Commission's service area boundary map (presented as Exhibit 1 to PKM's Complaint) is not unusual and it is not significant to resolution of this case. It is common for exception arrangements (such as OTP's service to Donaldson) to be omitted from the maps. The 1974 legislation that directed utilities to file boundary maps with the Commission excluded high-voltage electric lines from mapping, focusing on distribution facilities. Consistent with this standard, customers served as exceptions prior to 1974, large load service arrangements under Minnesota Statutes Section 216B.42 and exception service arrangements under Minnesota Statutes Section 216B.40 are not always referenced on the boundary maps.

- A. Please identify all instances whereby Otter Tail serves customers (large and/or small) in another utility's service area and the official service area map does not reflect the fact Otter Tail is providing service outside of its authorized service area.
- B. Please identify all instances whereby another utility serves customers (large and/or small) in Otter Tail's service area and the official service area map does not reflect the fact another utility is providing service within Otter Tail's authorized service area.

Attachments: 2

Attachment 2 to IR MN-DOC-15.pdf

Attachment 1 to IR MN-DOC-15.pdf

Response:

- A. The list of Otter Tail customers outside Otter Tail's service territory is included in Attachment 1. Local field personnel were tasked with verifying the customers on the list.

- B. Otter Tail used field personnel to gather information on any Rural Electric Cooperative or Municipal accounts that are inside Otter Tail's service territory. Attachment 2 includes the information that was provided by those field personnel. Because the information was gathered by several different field personnel, the data is provided in a few differing formats. In most instances, the information is provided in a listing of individual customers. In some instances maps are provided with Rural Electric Cooperative or Municipal served accounts highlighted rather than a listing of various individual accounts (because all of these accounts are served by neighboring providers and not by OTP, customer information such as names, addresses, etc., are not available from OTP's CIS system).

Otter Tail is still gathering information from two areas and will be providing an update to this response when that data is available.

			Cass Lake	MN	56633	Beltrami Electric
			Cass Lake	MN	56633	Beltrami Electric
			Solway	MN	56678	Beltrami Electric
			CLEARBROOK	MN	56634	
			CLEARBROOK	MN	56634	
			GONVICK	MN	56644	
			GONVICK	MN	56644	
			OKLEE	MN	56742	
			TRAIL	MN	56684	
			TRAIL	MN	56684	
			TRAIL	MN	56684	
			ERSKINE	MN	56535	
			ERSKINE	MN	56535	
			MCINTOSH	MN	56556	
			MCINTOSH	MN	56556	
			Clearbrook	MN	56634	
			OKLEE	MN	56742	
			TRAIL	MN	56684	
			Mentor	MN		
			Mentor	MN		
			Mentor	MN		
			HALLOCK	MN	56728	PKM
			HALLOCK	MN	56728	PKM
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			HALLOCK	MN	56728	PKM
			HALLOCK	MN	56728	PKM
			HALLOCK	MN	56728	PKM
			LANCASTER	MN	56735	PKM
			LANCASTER	MN	56735	PKM
			LANCASTER	MN	56735	PKM
			NORTHCOTE	MN	56728	PKM
			NORTHCOTE	MN	56728	PKM
			NORTHCOTE	MN	56728	PKM
			NORTHCOTE	MN	56728	PKM
			NORTHCOTE	MN	56728	PKM
			Northcote	MN	56728	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			OSLO	MN	56744	PKM
			STEPHEN	MN	56757	PKM
			ARGYLE	MN	56713	PKM
			ARGYLE	MN	56713	PKM
			ANGUS	MN	56762	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56713	PKM
			ARGYLE	MN	56713	PKM
			ANGUS	MN	56762	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56762	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
			ANGUS	MN	56712	PKM
				MN		PKM
				MN		PKM
				MN		PKM
				MN		PKM
			ARGYLE	MN	56713	PKM
			ARGYLE	MN	56713	PKM
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			ARGYLE	MN	56713	PKM
			ARGYLE	MN	56713	PKM
			ARGYLE	MN	56713	PKM
			ARGYLE	MN	56713	PKM
			BADGER	MN	56714	Roseau Electric Coop
			BADGER	MN	56714	Roseau Electric Coop
			BADGER	MN	56714	Roseau Electric Coop
			GREENBUSH	MN	56726	Roseau Electric Coop
			GREENBUSH	MN	56726	Roseau Electric Coop
			HOLT	MN	56738	Red Lake Electric Coop
			MIDDLE RIVER	MN	56737	Red Lake Electric Coop
			MIDDLE RIVER	MN	56738	Red Lake Electric Coop
			GREENBUSH	MN	56726	Roseau Electric Coop
			GREENBUSH	MN	56726	Roseau Electric Coop

			BROWNS VALLEY	MN	56219	
			MARIETTA	MN	56257	
			MARIETTA	MN	56257	
		...TRADE SECRET DATA ENDS]				

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
Letter**

Docket No. E131, 017/C-15-176 and E999/CI-12-957

Dated this 3rd day of March 2016

/s/Sharon Ferguson

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Peter	Beithon	pbeithon@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	Yes	OFF_SL_15-176_Official CC Service List
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