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June 1, 2015



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 Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard
Docket Number E999/M-15-462

Dear Mr. Wolf:

In response to the Minnesota Public Utilities Commission Order issued October 23, 2014 in the above described matter, Otter Tail Power Company hereby submits its Solar Energy Standard Report.

This filing has been served on all persons on the attached service list by electronic service or by First Class mail. A Certificate of Service is also enclosed.

Should you have any questions, please contact me at <u>bhdraxten@otpco.com</u> or (218) 739-8417.

Sincerely,

/s/ BRIAN DRAXTEN
Manager Resource Planning

nlo Enclosures By Electronic filing c: Service List



OTTER TAIL POWER COMPANY Annual Report on Progress in Achieving the Solar Energy Standard 2014 DOCKET NO. E999/M-15-462

Otter Tail Power Company (Otter Tail or Company) submits this report in compliance with the Minnesota Public Utilities Commission's Order issued October 23, 2014 in the above described docket.

1) Annual Minnesota retail sales for the previous calendar year:

Minnesota retail sales

2,320,436 MWh

2) Annual excluded customer sales for the previous year:

Estimated excluded customer sales

0 MWh

3) A list of customers requesting exclusion from the requirements of the SES, the NAICS code associated with their manufacturing activity and their annual kWh usage:

At this time, the Company has not had any customers request the exclusion from the SES requirements. The Company has projected a list of customers we believe will qualify for the exclusion.

4) The total Minnesota retail sales for customers excluded from the SES requirement:

Minnesota retail sales less estimated excluded sales

2,320,436 MWh

(Note: The Company interprets this to be 2014 energy sales less exempt customers.)

5) Annual solar generation on the utilities' system for the previous calendar year (including the total number of units registered in M-RETS to that utility and S-RECs generated in the past year from those units):

The Company had a total of 71 MWh of solar generation for the year of 2014. The Company has one small solar facility registered in M-RETS at this time. Once the Minnesota SES compliance tracking process is enabled in M-RETs, the Company anticipates registering the facilities that are eligible.

6) Estimated amount of solar generation (expressed as capacity) a utility would be required to obtain in 2020:

The Company estimates that 28 MW of nameplate solar capacity would be needed to meet the Company's SES requirements. This assumes Company's Minnesota retail sales

of 2,522,000 MWh in 2020 less estimated excluded sales of 84,632 MWh and a 15 percent net capacity factor for solar generation facilities.

7) Estimated solar energy requirements to meet the SES in 2020:

The Company estimates that 36,561 MWh of solar energy will be needed to meet the Company's SES requirements in 2020.

8) Short summary of ongoing efforts to obtain solar energy (including a brief summary of the anticipated mix of project sizes for SES compliance):

The Company is developing its plan to meet the SES requirements. In Otter Tail's most recent resource plan, the Commission ordered Otter Tail to "report on its progress toward the December goal in each of its Annual SES Reports required under Minn. Stat. § 216B.1691, Subd. 2f(g)." The Company has had discussions with various solar developers about a project that could be in operation prior to the end of 2016 to take advantage of the 30% ITC and pricing for a project in 2019. At this time, the Company believes delaying a utility-scale solar project until 2019 is in the best interests of our customers since delaying a project by three years provides a significant gain in present value of revenue requirements—offsetting the reduction in the ITC from 30% to 10%. In addition, it may be preferable and desirable not to accelerate the solar generation ahead of the SES requirements due to the following factors:

- Solar technologies and installation costs are expected to continue to decline over the next several years.
- The solar renewable energy credit (SREC) market has not yet evolved and may prove to be a more cost effective way for Otter Tail to meet Minnesota's solar mandate.
- If the 30% ITC were extended, it would create a significant benefit for Otter Tail's customers.

In addition, Otter Tail intends to continue operating as one integrated system with one resource mix. Otter Tail will evaluate solar as well as other resources to meet our customers' future need for energy in the most cost-effective manner while satisfying regulatory requirements in all the jurisdictions in which it serves.

9) Progress towards the ten (10) percent carve-out for systems less than 20 kw:

Research covering solar PV market potential indicates that meeting the ten percent carveout by 2020 will be a challenge for Otter Tail and its customers.

The Company is currently evaluating strategies to meet the ten percent carve-out for systems less than 20 kW in size. The Company's objective in this legislative requirement

is to meet the objective as cost effectively as possible while minimizing upward pressure on customer rates and cross subsidization between different classes of ratepayers. The Company is monitoring forecasts from numerous sources in the solar industry indicating a continued decline in costs of solar PV systems.

In 2014, Otter Tail started discussions with a university to fund half the cost of a 20 kW solar PV installation, up to a maximum cost share of \$40,000. Otter Tail and the university continue these discussions and we are forming a partnership to further evaluate how the university can best use the 20 kW solar PV system for educational opportunities on the campus and throughout the community.

The Company and Minnesota Department of Commerce—Division of Energy Resources ("DOC") staff have informally exchanged dialogue on proposed strategies to costeffectively meet the carve-out requirements. Strategies discussed to date have included a utility-scale solar PV project with customer subscriptions to generation benefits; added funding from Otter Tail to the Made in Minnesota account above and beyond legislative requirements; and Otter Tail administering its own solar incentive program within the Conservation Improvement Program ("CIP") or possibly outside of CIP. At this time, the Company is unsure of the appropriate mechanism to recover the costs of solar PV incentive programs that are not included within CIP. The Company looks forward to future interaction with the DOC to identify an appropriate recovery mechanism. The Company anticipates that next year's SES report will have greater detail on the expected mix of project sizes and plans to meet the SES requirements.

10) Brief summary of the state (s) in which the solar generation is located or anticipated to be located:

For customer-owned and Company-owned solar generating facilities or purchased power agreement (PPA) facilities, the Company expects those facilities to be located within the three states the Company serves (Minnesota, North Dakota and South Dakota). If solar renewable energy credit (S-REC) procurement proves to be a component of a cost effective means to meet the SES, then the solar facilities could be located outside of the three states the company serves.

11) A breakdown of solar RECs generated in the previous calendar year under each of the following categories:

a. Facilities receiving the Value of Solar rate

The Company does not have a Value of Solar rate in place at this time.

b. Community Solar Gardens

The Company does not have a Community Solar Garden in place at this time.

c. Facilities under a Net metering tariff

The Company has 15 customer-owned solar facilities with a nameplate capacity totaling 146 kW with generation of 71 MWh for the year 2014. Four of the customer-owned facilities (with solar generation totaling 45 MWh in 2014) are on tariffed rates in either North Dakota or South Dakota where the tariff allows for the customer to retain the RECs and the customer has chosen to do so.

d. Utility-owned solar projects

The Company does not have any utility-owned solar projects at this time.

e. Solar facilities that have entered into a PPA with the utility

The Company does not have any solar PPAs at this time.

f. Facilities receiving an incentive, such as SolarRewards or Made in Minnesota

Otter Tail contributed \$103,909 toward the Made in Minnesota program in January 2014. For 2014, two Otter Tail customers were selected by the lottery process to receive incentives from the Made in Minnesota fund. At this time, Otter Tail has not provided any other incentives outside of the Made in Minnesota program to solar facilities.

CERTIFICATE OF SERVICE

RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard

Docket Number E999/M-15-462

I, Nancy L. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service lists by electronic service or by first class mail.

Otter Tail Power Company Report

Dated this 1st day of June, 2015.

/s/ NANCY L. OLSON

Nancy L. Olson Regulatory Filing Coordinator Otter Tail Power Company 215 South Cascade Street Fergus Falls MN 56537 (218) 739-8376

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