

April 3, 2019

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

RE: Letter from the Minnesota Department of Commerce, Division of Energy Resources regarding Otter Tail Power Company's 2015 General Rate Case and the 2017 Commission Investigation into Changes in the Federal Tax Code
Docket Nos. E017/GR-15-1033 and E,G999/CI-17-895

Dear Mr. Wolf:

On March 30, 2018, Otter Tail Power Company (Otter Tail or the Company) and the Minnesota Chamber of Commerce (Chamber), collectively referred to as the Parties, filed a *Joint Request to Reopen Order Approving Compliance Filing* (Joint Request). In this Joint Request, the Parties notified the Minnesota Public Utilities Commission (Commission) of their concerns with implementation of final rates for the Large General Service (LGS) rate class. Specifically, the Parties noted that unintended rate impacts were identified after the implementation of final rates for certain LGS customers and that it was necessary to reopen the compliance order to correct these unintended rate impacts and to align the LGS rate design with rate design fundamentals and the principles of the LGS rate design agreement between the Parties. The Minnesota Department of Commerce, Division of Energy Resources (Department) responded to the Joint Request of May 24, 2018 and concluded that Otter Tail had not, at the time, met its burden of proof to show why rates approved by the Commission must be changed. The Department did, however, note that it remained open to considering further information if Otter Tail provided specific information in *Reply Comments*.

Otter Tail filed *Reply Comments* on January 3, 2019 where it made a new proposal and attempted to respond to the areas of concern noted in the Department's May 24, 2018 *Comments*. The Company proposed a new LGS rate design in which Otter Tail proposed to incorporate its rate design change for the LGS rate class with the impacts of the Commission's December 5, 2018 *Order* in Docket No. E,G999/CI-17-895 (Tax Docket). After conversations with the Department, Otter Tail filed additional information on February 20, 2019. In this filing, Otter Tail included letters from two LGS customers who are impacted by the current rate design.

The Department filed *Response Comments* on March 8, 2019. In these *Response Comments*, the Department concluded that harm appears to exist with the Company's current rate design. Although the Department is typically reluctant to reopen rates between rate cases, in particular for a single issue, the Department concluded that the information in the Company's February 20, 2019 filing, and

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sales data provided in discovery, suggests that there may be appreciable risk that certain LGS customers would change service because of the current rate design. The Department recommended that the Commission approve Otter Tail's revised rate design proposal presented in its January 3, 2019 *Reply Comments* with a minor adjustment. In particular, the Department noted that Otter Tail proposes a small increase in rates to the LGS-Standard Transmission rate group. To avoid a rate increase for any customer, the Department recommended that the Commission require Otter Tail to re-allocate the rate increase amongst other LGS rate groups such that the LGS-Standard Transmission rate group is held harmless by the Company's revised rate design proposal.

On March 26, 2019, Otter Tail submitted *Reply Comments* to address the Department's *Response Comments*. Otter Tail stated that it appreciates the Department's support for the Company's revised proposal and acknowledged that the proposed rate design reflects a minor increase to the LGS-Standard Transmission rate group. The Company further explained that the billing determinants and the associated rate design from Otter Tail's general rate case for the LGS-Standard Transmission rate group was originally based on one customer. Subsequent to the rate case, this customer left the rate group and, at this time, Otter Tail does not have a customer on the LGS-Standard Transmission rate schedule. As such, the Company stated that no customer is "harmed" by the proposed slight increase in rates. Otter Tail concluded its discussion by stating that the proposed rate design would send the proper price signals to customers interested in taking service under Otter Tail's LGS-Standard Transmission rate.

The Department reviewed the Company's March 26, 2019 *Reply Comments* and appreciates the additional clarifying information. Based on its review of this additional information, the Department no longer takes issues with Otter Tail's proposed rate increase for the LGS-Standard transmission rate group. As noted in its *Response Comments*, the Department recommended an adjustment to the Company's revised rate design proposal to avoid a rate increase for any customer. Since there is currently no customer in the LGS-Standard transmission rate group, there will be no rate increase. Furthermore, as discussed in its May 24, 2018 *Comments*, the Department was interested in the issue of whether harm exists in regards to the reasonableness of adjusting rates. Again, since no customers currently receive service under the LGS-Standard transmission rate group, there is no direct harm as a result of the Company's revised rate design proposal. Therefore, the Department recommends that the Commission approve Otter Tail's revised rate design proposal presented in its January 3, 2019 *Reply Comments* as filed.

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

Sincerely,

/s/ ADAM J. HEINEN

Rates Analyst

AJH/ja

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. E017/GR-15-1033 and E,G999/CI-17-895

Dated this 3rd day of April 2019

/s/Sharon Ferguson

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