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September 26, 2024



Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of Otter Tail Power Company 2023 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2024  
Docket No. E017/M-24-30  
IEEE Supplemental Amendment Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits this IEEE Supplemental filing Amendment in the above-referenced matter in compliance with ordering paragraph 3 of the Minnesota Public Utilities Commission's Order dated December 5, 2023, in Docket No. E017/M-23-76 (In the matter of Otter Tail Power Company's 2022 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2023 and future standards).

- 3. Set Otter Tail Power's 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Otter Tail's work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Required Otter Tail to file a supplement to its 2023 SQSR report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet.*

The IEEE 2023 Benchmark Reliability Survey results were completed July 23, 2024. The 2023 IEEE Benchmark Results were updated on September 18, 2024 to include utilities, small, medium and large, thus the amended results shown below compare Otter Tail standards to medium sized utilities.

**Table 1** shows Otter Tail's 2023 normalized SAIFI, CAIDI and SAIDI results based on the IEEE 2.5 Beta Method for the entire Minnesota system and work centers, compared with

the IEEE benchmarking second quartile for medium sized utilities. Otter Tail’s **2023 results were gathered by our Interruption Monitoring System which captures customer minutes and sustained customer interruptions at the feeder level.**

**Table 1**

	SAIDI IEEE	SAIFI IEEE	CAIDI IEEE
2023 IEEE Benchmark Median for medium sized utilities	121	1	139
Bemidji	106.29	1.94	54.73
Crookston	128.63	1.7	75.57
Fergus Falls	70.96	1.04	68.24
Morris	135.71	1.61	84.15
MN Total	96.28	1.38	69.89

SAIFI, the measurement of interruption frequency, exceeds the IEEE benchmark median results for medium sized utilities due to the fact we serve several rural communities with low customer densities. This rural demographic requires greater system exposure, i.e. greater transmission distances, when compared to most medium sized utilities, in the benchmark survey participants. As noted in previous Otter Tail SRSQ filings, we are currently in the process of migrating to more granular interruption data for our reporting in the 2024 timeframe. At that time, it’s expected we will see impacts to all metrics.

Regarding the excessive SAIDI results for Crookston and Morris, Otter Tail is evaluating interruption by cause and locations for these two service centers and addressing the common causes. For comparison, 2022 2<sup>nd</sup> quartile SAIDI IEEE for medium sized utility results was 143 minutes.

Also included in this filing is Otter Tail’s response to Information Request MN-DOC-007, Docket No. E017-M-24-30. Specifically: *Provide the 2023 OMS system data for SAIDI, SAIFI, and CAIDI using the 2.5 Beta Method for each CSC and the enter Minnesota System (if available).*

Otter Tail’s original response did not include indices for our Minnesota System. These are included in **Table 2.**

**Table 2**

**OMS 2.5 Beta  
2023**

CSC	CAIDI	SAIDI	SAIFI
<b>Bemidji</b>	87.29	106.46	1.22
<b>Crookston</b>	101.17	163.59	1.62
<b>Fergus Falls</b>	99.8	194.21	1.95
<b>Morris</b>	150.36	203.51	1.35
<b>MN Total</b>	101.77	178.86	1.76

Otter Tail has electronically filed this document with the Minnesota Public Utilities Commission and on all persons on the official service list for the above-referenced docket. A Certificate of Service is also enclosed.

Please contact me at (218) 739-8552 or [rjensen@otpc.com](mailto:rjensen@otpc.com), should you have any questions.

Sincerely,

*/s/ ROD D. JENSEN*  
Rod D. Jensen PE  
Senior Reliability Engineer

lcd  
Enclosures  
By electronic filing  
c: Service List

OTTER TAIL POWER COMPANY

Docket No: E017-M-24-30

Response to: MN Department of Commerce

Analyst: Mary Beth Kehrwald

Date Received: May 02, 2024

Date Due: May 13, 2024

Date of Response: May 13, 2024

Responding Witness: Mike Riewer, Manager, System Infrastructure & Reliability

(218) 739-8565

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Information Request:

- A. Was Itron interruption monitoring system (IMS) data used for 2023 reliability performance (SAIFI, SAIDI, CAIDI, MAIFI) reporting in the petition?
- B. Will 2024 be the first year reporting performance data from the Outage Management System (OMS)?
- C. Provide the 2023 OMS system data for SAIDI, SAIFI, and CAIDI using the 2.5 Beta Method for each CSC and the enter Minnesota System (if available).
- D. Will IMS data continue to be provided during the initial implementation of OMS performance reporting (to allow comparable analysis of current and historical reliability performance while OTP increases the granularity of reporting)?

Attachments: 0

Response:

- A. The Itron interruption system was used for 2023 indices reporting.
- B. 2024 will be the first year the Outage Management System will be utilized for Otter Tail's SRSQ reporting.

C.

CSC	CAIDI	SAIDI	SAIFI
Bemidji	87.29	106.46	1.22
Crookston	101.17	163.59	1.62
Fergus Falls	99.8	194.21	1.95
Morris	150.36	203.51	1.35
MN total	NA	NA	NA

- D. Itron AMI meters are currently being replaced with L&G AMI meters as part of our system AMI deployment, thus, IMS data will not be available.

## CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2023 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2024  
Docket No. E017/M-24-30**

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
IEEE Supplemental Amendment Filing**

Dated this **26<sup>th</sup>** day of **September, 2024**.

/s/ LAURA DEWEY  
Laura Dewey  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8604

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-30_Official
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Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_24-30_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-30_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-30_Official
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