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March 13, 2023

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

**RE: In the Matter of a Commission Investigation into the Potential Role of
Third-Party Aggregation of Retail Customers
Docket No. E999/CI-22-600
Initial Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Initial Comments in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8639 or jgrenier@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Market Planning

sjw
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of a Commission
Investigation into the Potential
Role of Third-Party Aggregation of
Retail Customers**

Docket No. E999/CI-22-600

INITIAL COMMENTS

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) appreciates the opportunity to submit the following comments in response to the Minnesota Public Utilities Commission (Commission or MPUC) notice for comment on whether the commission should take action related to third party aggregation of retail customers.

II. BACKGROUND

The matter of the role aggregators of retail customers (ARCs) can participate in the Minnesota energy market is not new. In response to the October 2008 and July 2009, Federal Energy Regulatory Commission (FERC) Order 719 and 719-A, that required transmission organization to permit non-utilities to bid aggregated demand response resources directly into the Regional Transmission Organization's wholesale energy and ancillary services markets, unless the laws or regulations of the retail regulatory authority do not permit retail customers to participate. In response to the FERC Orders, the Commission opened an investigation in Docket No. E-999/CI-09-1449. In its May 18, 2010 Order in that docket the Commission issued its decision prohibiting the operation of ARCs in Minnesota's organized energy markets, citing concern over how they would fit into the regulatory structure and what mechanisms would be employed to ensure their actions are just, reasonable, and served the public interest.

On April 16, 2013, the Commission made a subsequent Order in Docket No. E-999/CI-09-1449. In that Order the Commission reaffirmed their decision "providing for ARCs to conduct demand response programs in Minnesota in conjunction with Minnesota utilities." Since the Commission's April 2013 Order, Otter Tail has not been contacted by any ARCs interested in working in conjunction on Demand Response (DR) customer programs and Otter Tail has not initiated any discussions with ARCs to work on DR projects. Otter Tail

believes its DR portfolio is very robust and has not found an opportunity where ARCs can provide further value to our customers.

A subsequent decision in Docket No. E002/M-21-101, the Commission permitted the participation of third-party aggregators in an Xcel Energy pilot program as a means to achieve the utility's DR program requirements, as previously ordered by the Commission.

III. OTTER TAIL COMMENTS

Fundamental to deciding what role ARCs should play in the Minnesota energy market is whether Otter Tail and other utilities have aggressively sought to engage with its customers to create a dynamic demand response portfolio. Otter Tail has an established history in demand response offerings spanning more than 40 years with more than one-third of its customers, over 44,000 off-peak meters, participating in some type of demand response tariff with the majority of that as direct load control (as opposed to an opt-in or out type of program). The advantage of direct load control resources are that they can be quickly and reliably dispatched and accredited with the Midcontinent Independent System Operator (MISO) as a load modifying resource. Together Otter Tail and its participating customers provide a valuable resource that is used in several ways to benefit all customers and the electrical system, including:

- Priority application of DR resources to support infrequent MISO emergency capacity events that in turn helps to assure the stability and reliability of the MISO grid.
- Application of DR resources it for contingency events when load may be curtailed for transmission and distribution line events, maintenance, and storm restoration.
- Frequent application of DR resources for economic control to avoid the purchase of high-priced energy. Economic control is accomplished by responding to five-minute locational marginal price (LMP) signals in the MISO market. In this way our retail DR customer participants provide benefits to participants and non-participants alike, lowering energy cost adjustments and passing savings through directly to all customers.

The benefits of Otter Tail's demand response program include enhanced system reliability, lower energy costs, improved system efficiency including a higher load factor, and diversity of energy resources. The current DR portfolio allows the Company to control about 19 percent of its winter peak load. That in turn reduces annual system capacity needs. The Company registers its demand response resources in the MISO market.

Presently we have 16 MW of summer capacity registered. Once MISO moves to a seasonal construct, we will register up to 90 MW of winter capacity as well.

In addition to avoided capacity costs, the Company’s economic load control has saved customers millions of dollars annually in avoided high energy cost purchases. By performing direct load control during high priced periods, high energy costs are avoided and these savings are passed on to customers through the cost of energy adjustment rider. Table 1 below shows historic energy savings from control during high energy cost periods from Otter Tail’s economic load control program.

Table 1	MWh Saved
2018	78,583
2019	82,466
2020	81,559
2018-2020 Avg.	80,869
2018-2020 Total	242,608

In the 2021 Demand Response Potential Study¹, Brattle Group completed for Otter Tail, Brattle researchers concluded that Otter Tail’s:

- Existing DR programs represented (at that time) 15% of the Company’s winter-season system peak. (This capacity has since reached 19%.)
- Existing DR capability is in the top 10% of U.S. investor-owned utilities.
- DR portfolio is regularly utilized to provide system value and is embedded as a resource in the Company’s resource adequacy planning.
- DR portfolio of existing programs have reached maximum achievable levels of adoption, indicating the Company has actively promoted DR with its customers.
- Some opportunity exists for new program designs in a high-value scenario where there is a need for capacity over the horizon.

As a small investor-owned utility Otter Tail has consistently sought to operate lean and provide value streams for customers to avoid rate increases. Additionally, we are aware that maintaining high customer satisfaction and low rates is critical to our, and our customers and served communities, long-term success.

¹Docket No. E017-RP-21-339, Appendix H: Brattle Group Study on Demand Response.

The introduction of ARCs not working in conjunction with electric utilities in Minnesota will erode Otter Tail's DR resources, as customers currently on the Company's DR tariff offerings are recruited into an ARC program. Otter Tail customers participating in ARC programs will reduce the Company's economic load control benefits which impacts all customers as higher priced energy which was avoided, will be purchased, and then passed on to customers through the cost of energy adjustment.

An additional consideration for an electric utility, or an ARC, to provide a DR resource, is the communications network that will communicate with the load and back information to the system operator. While Otter Tail has built a robust DR resource with its legacy one-way communications load control system, further benefits will soon be realized when its AMI system and planned updated load management system are available. These systems will expand reach to additional customer end-use devices and smart technologies. This will include programmable thermostats, electric vehicle charging, building automation systems, home energy systems, interaction with distributed energy resources including solar installations, battery storage, and microgrids, and other cutting-edge devices. This investment into a new two-way communications network is already underway with the AMI system installation slated for completion by end of year 2024. An advanced two-way communications system will provide the utility a path to add a greater number of megawatts under load management by providing better utility forecasting of potential load available for control and performing measurement and verification of load control impacts. Two-way communication also provides higher customer satisfaction as the communications provide customer choice and better awareness of customer comfort during control. ARCs participation which is not in conjunction with the utility will reduce value to customers since redundant communication equipment and metering may be required at an additional cost.

As customers moved from existing rates to ARC programs, coordination between the ARC and utility will be critical to avoid billing errors. Further, there will be regular adjustments to who controls the load and what load is available for utility control. Increased truck rolls to the customer's premise to collect devices or stranded assets could increase costs and become an issue for the utility if equipment used for control is no longer needed by the customer. The introduction of ARCs into the service area will make creating an accurate integrated resource plan more difficult as ARC-recruited loads may move back and forth from Company control to ARC control leading to immediate and long-term load forecasting becoming complicated.

The introduction of ARCs further has the potential to create customer confusion. Customer loads could not be counted as a resource in both portfolios (ARC and utility)

however customers on current DR rates may also sign up for control through an ARC offering without realizing their load would not be eligible for service through the Otter Tail DR rate they are currently receiving service through. It may also create customer confusion about which entity is initiating control and who to contact if there are issues with the control. These points together, show the potential of the introduction of ARCs to create customers confusion and an administrative burden for utility operations.

Traditionally ARCs have argued that utilities lack motivation to maximize DR resources and instead pursue the addition of plant investments and expansion. However, it is the role of the Commission to ensure utilities are allowed recovery only for prudent investments. Further through the passage and implementation of the 2021 Minnesota Energy Conservation and Optimization Act (ECO Act), the state has created incentives for regulated utilities to further develop efficient conservation and load management programs, adding oversight by the Minnesota Department of Commerce's' Division of Energy Resources to create even more net benefits for customers. Otter Tail asserts that there is no need for ARCs when utilities are focused and incentivized on optimizing their system through innovative and effective programs.

A. Should the Commission permit aggregators of retail customers to bid demand response into organized markets?

Otter Tail believes that its long history of providing highly effective demand response programming illustrates how seriously utilities procure DR resources. Otter Tail has used those resources to deliver value to its customers through lower energy charges and grid management. Further, the Company is investing into a metering and control systems to support development of new demand response offerings.

For these reasons, Otter Tail recommends the commission maintain their April 16, 2013 Order, where ARCs are allowed to conduct demand response programs in Minnesota only in conjunction with Minnesota utilities.

B. Should the Commission require rate-regulated electric utilities to create tariffs allowing third-party aggregators to participate in utility demand response programs?

Otter Tail does not believe tariffs allowing third-party aggregators to participate in demand response are necessary unless the Commission has found the utility to be deficient in its load management offerings in its latest IRP. Many ARCs are already working with utility systems as a contracted service to reach targeted loads such as smart thermostats through their headend systems and make

that load available for utility load management efforts. This contracted and integrated approach allowing ARCs and utilities to partner in delivering load management is preferable versus required tariffs and the independent operation of ARCs in the market.

C. *Should the Commission verify or certify aggregators of retail customers for demand response or distributed energy resources before they are permitted to operate, and if so, how?*

Should the Commission allow third-party ARCs to operate in Minnesota, the ARC should be verified or certified and possibly deemed a public utility by the Commission. Minnesota Statute 216B.02, subd. 4, which defines a public utility, should be applied to any ARC operating in Minnesota. If the ARC is not working in conjunction with a utility, and the ARC is deemed a public utility, the ARC should be subject to regulation by the Minnesota Public Utilities Commission to ensure the public interests are served. As stated in the Commission Action of the May 18, 2010 Order,

“The Minnesota Public Utilities Act creates a comprehensive regulatory structure to ensure that all state providers of electrical service have just and reasonable rates and just and reasonable terms and conditions of service. It is unclear at this point how ARCs would fit into that regulatory structure and what mechanisms the Commission would use to ensure that their actions and practices met the “just and reasonable” legal standard and served the public interest.”

D. *Are any additional consumer protections necessary if aggregators of retail customers are permitted to operate?*

Formal rules regarding communications to the public utility for which customers are participating with an ARC is necessary for public utility planning purposes, billing, customer communications, and demand response accreditation.

On September 17, 2020, FERC issued Order 2222, once implemented, the Order will require transmission organizations and independent system operators such as MISO, to enable distributed energy resources (DERs) access to the wholesale energy markets. In 2021 and 2022, Otter Tail participated in the MISO stakeholder process to develop the compliance filing to meet the requirements of FERC Order 2222. Upon FERC’s approval of MISO’s compliance filing, Otter Tail will implement strategies to align with MISO and MPUC rules. Otter Tail is unaware of the timing of FERC’s final approval of MISO’s compliance filing.

IV. CONCLUSION

Otter Tail has aggressively pursued the development of DR resources in partnership with its customers. The Company's DR portfolio is used frequently for capacity, contingency, and economic control events which help to manage the grid and to save customers money on pass through energy cost adjustment charges. The Company's most recent DR potential study indicated Otter Tail ranks in the top ten percent among utilities in the United States in DR capability.

The Company is investing in updated metering and communications infrastructure. It anticipates upgrading load control systems that will support the future development of additional DR resources. Further, we anticipate new opportunities available through the 2021 Minnesota ECO Act to optimize customer energy usage in future ECO Triennial plan filings.

The entrance of ARCs into the marketplace will disrupt current DR resources, create customer confusion, and add administrative burden for the utility. For these reasons Otter Tail does not support the Commission allowing third-party aggregators to enter the Minnesota energy market without partnering with a utility. Otter Tail further doesn't support requiring utilities to create tariffs for third-party aggregators. We do support the Commission's April 16, 2013 Order restricting ARCs from operating in Minnesota to operate only in conjunction with Minnesota utilities. Otter Tail is open to working with the Commission and others to ensure the DR programs it pursues are the most cost-effective DR program options available.

In the event the Commission allows ARCs to participate in Minnesota without partnering with a utility, Minnesota Statute 216B.02, subd. 4 must be applied to distinguish if the ARC is a public utility and regulated by the Commission.

Otter Tail is available to answer any questions that the Commission may have about these comments.

Dated: March 13, 2023

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON GRENIER

Jason Grenier, Manager

Market Planning

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CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Investigation into the Potential Role of Third-Party Aggregation of Retail Customers
Docket No. E999/CI-22-600**

I, Stacy Wahlund, 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
Initial Comments**

Dated this **13th** day of **March, 2023**.

/s/ STACY WAHLUND
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