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September 11, 2023

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 a Request for Specialized Technical Professional  
Investigative Services from the Minnesota Department of Commerce,  
Division of Energy Resources  
Docket No. E999/CI-17-879  
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](mailto:jgrenier@otpc.com) if you have any questions regarding this filing.

Sincerely,

*/s/ JASON GRENIER*  
Jason Grenier  
Manager  
Retail Energy Solutions

sjw  
Enclosures  
By electronic filing  
c: Service List

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

**In the Matter of a Request for  
Specialized Technical Professional  
Investigative Services from the  
Minnesota Department of Commerce,  
Division of Energy Resources**

**Docket No. E999/CI-17-879**

**INITIAL COMMENTS**

**I. INTRODUCTION**

On August 31, 2023, the Minnesota Department of Commerce (Department) filed a letter requesting the Minnesota Public Utilities Commission (Commission) authorize the Department to incur additional costs for specialized technical professional investigative services under Minn. Stat. §216B.62 subd. 8 to assist the Department with evaluating utility electric vehicle (EV) filings. As noted in the Department’s filing Otter Tail Power Company (Otter Tail or the Company) was contacted by the Department and expressed no opposition to the request. On September 5, 2023, the Commission issued an objection period for comments on this matter to be submitted to the Commission. Otter Tail does not object to the Department’s request, but the Company does have two items that need clarification from the Department based on its request.

**II. OTTER TAIL RESPONSES**

First, Otter Tail is interested in understanding how the Department proposes to allocate EV costs to the utilities. It seems appropriate that each utility pay for expenses associated with their own filings. However, if a collaborative EV issue impacting all utilities is being reviewed, then how will the costs of the specialized technical expertise be allocated to each utility? Otter Tail proposes expenses related to generic EV issues be allocated to each utility based on the Commission’s annual report summarizing the number of EVs in each utility service area.<sup>1</sup> This ratio would reflect the customers impacted by these proceedings across the state and would be updated annually.

The second item Otter Tail would like clarification from the Department on is how expenses can be recovered by the utility. Otter Tail proposes that since it has an EV rebate program proposed within its 2024-2026 Energy Conservation and Optimization (ECO)

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<sup>1</sup> For instance, the report based on January 2023 data, lists Xcel Energy with 23,115 (97.3%), Minnesota Power Co with 500 (2.1%), and Otter Tail with 144 (0.6%) of EVs for the IOUs.

Plan but does not have an EV rider for cost recovery, the ECO rider should be eligible for recovery of these expenses. Otter Tail expects these costs to be small initially, but they will likely grow over time and an appropriate mechanism should be identified for cost recovery.

### **III. CONCLUSION**

Otter Tail appreciates the work of the Department in reviewing these filings and believes it is appropriate for the Department to have technical expertise available to support its review and evaluation efforts. The Company does not object to the Department's proposal but asks that it respond through this comment process to address Otter Tail's questions on cost allocation and recovery options.

Dated: September 11, 2023

Respectfully submitted,

#### **OTTER TAIL POWER COMPANY**

By: /s/ JASON GRENIER

Jason Grenier

Manager, Retail Energy Solutions

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8639

[jgrenier@otpc.com](mailto:jgrenier@otpc.com)

**CERTIFICATE OF SERVICE**

**RE: In the Matter of a Request for Specialized Technical Professional Investigative Services from the Minnesota Department of Commerce, Division of Energy Resources  
Docket No. E999/CI-17-879**

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 **11th** day of **September, 2023**.

/s/ STACY WAHLUND  
Stacy Wahlund  
Regulatory Filing Coordinator  
Otter Tail Power Company  
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