

**State of Minnesota
Before the Public Utilities Commission**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

In the Matter of Distribution System Planning for Otter Tail Power Company	Docket No. E017/CI-18-253
In the Matter of Distribution System Planning for Minnesota Power	Docket No. E015/CI-18-254
In the Matter of Distribution System Planning for Dakota Electric Association	Docket No. E111/CI-15-255

Reply Comments of the Citizens Utility Board of Minnesota

The Citizens Utility Board of Minnesota (CUB) appreciates the opportunity to submit these Reply Comments regarding draft Integrated Distribution Plan (IDP) requirements for Otter Tail Power Company, Minnesota Power, and Dakota Electric Association.

CUB reiterates its position as articulated in our Initial Comments submitted to the Minnesota Public Utilities Commission (Commission). To date, CUB has not identified any planning requirements that need modification from those the Commission adopted for Xcel Energy in its August 30, 2018 order in Docket No. E-002/CI-18-251 (Order). CUB submits that the requested modifications to the requirements by Otter Tail Power Company, Minnesota Power, and Dakota Electric Association, do not demonstrate additional improvements to the process, in favor of the public interest. The requirements under the Order were developed through an extensive, collaborative process, in which the outcomes were found to meet the planned objectives of the IDP. CUB believes that the requirements developed under the Order are reasonable, in the public interest, and should be adopted within these dockets.

CUB affirms the comment submitted by the Minnesota Department of Commerce Division of Energy Resources in its Initial Comments. CUB acknowledges the, “[e]xisting information asymmetry between regulators and Minnesota’s utilities...” and suggests that that asymmetry extends to additional stakeholders, utility customers, and the general public.¹ Information asymmetry between parties is often not in the public interest. Format and data incongruity in reporting creates time, cost, and capacity challenges for the public to effectively inform the regulatory process. Consistent reporting across utilities, aids in overcoming these barriers and assists in achieving public benefit through a better-informed process.

CUB believes the Commission has set a reasonable process to allow flexibility in reporting. This standard is established in the Order.² This standard establishes an intra-report process to allow a company a pathway to reasonably explain why it is unable to meet reporting requirements due to impracticality, or cost-

¹ *In the Matter of Distribution System Planning for Ottertail Power Company, Minnesota Power, and Dakota Electric Association*, Dockets No. E017/CI-18-253, E015/CI-18-254, E111/CI-15-255.

² *Minnesota Integrated Distribution Planning Requirements For Xcel Energy*, Docket No. E002/CI-18-251. p.1

prohibition. This process maintains the integrity of the reporting process and requirements, creates transparency in action, establishes a pathway for utilities to meet the objectives of the reporting process, and provides information for the establishment of alternative reporting metric to meet planning objectives.

Therefore, CUB again requests that the Commission adopt the requirements established in Docket E002/CI-18-251, in full, for Otter Tail Power, Minnesota Power and Dakota Electric Association, as an already informed and established framework to meet the objectives of the IDP planning process and as vigilant to the public interest.

Respectfully submitted,

September 28, 2018

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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