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August 4, 2017

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

**RE: In the Matter of Otter Tail Power Company's 2017 Annual Report on Progress in
Achieving the Solar Energy Standard
Docket No. E017/M-17-283
Reply Comments in Response to Minnesota Solar Energy Industries Association**

Dear Mr. Wolf:

Otter Tail Power (Otter Tail) provides the following Reply Comments in response to the Minnesota Solar Energy Industries Association.

Otter Tail believes all solar renewable energy credits tracked through Midwest Renewable Energy Tracking System (M-RETS), and meeting capacity requirements established in Minnesota statute, are eligible to count towards the Solar Energy Standard's (SES) compliance. Compliance language establishing the SES is contained within the Renewable Energy Standard statute, Minn. Stat. § 216B.1691. This statute led to the Minnesota Public Utilities Commission establishing M-RETS, which has a long and successful history of tracking and retiring renewable energy credits for utility renewable energy compliance across multiple states.

Please feel free to contact me at 218-739-8639 or jgrenier@otpc.com with any questions.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Market Planning

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Enclosures
By electronic filing
C: Service List

**OTTER TAIL POWER COMPANY REPLY COMMENTS
TO THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**REGARDING OTTER TAIL POWER COMPANY'S 2017 ANNUAL REPORT
ON PROGRESS IN ACHIEVING THE SOLAR ENERGY STANDARD
DOCKET NO. E017/M-17-283
August 4, 2017**

I. Background

Otter Tail Power Company (Otter Tail, Company) appreciates comments provided by the Department of Commerce, Minnesota Solar Energy Industries Association (MnSEIA), in regards to Minnesota Public Utilities Commission Docket No. E999/M-17-283 Notice of Reporting Requirements and Comment Period in the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard (SES). Otter Tail respectfully notes the following from the Minnesota Department of Commerce Division of Energy Resources (Department) in the Department's comments dated June 6, 2017:

1. On April 14, 2017, the Minnesota Public Utilities Commission (Commission) issued a *Notice of Reporting Requirement and Comment Period* directing utilities subject to the solar energy standard (SES) to file annual reports by June 1st, and requesting comments on whether the annual reports complied with the Commission's reporting requirements set forth in its April 25, 2014 and October 23, 2014 Orders in Docket No. E999/CI-13-542.
2. Minnesota Power (MP), Otter Tail, and Xcel Energy (Xcel) are subject to the SES and submitted annual reports.
3. In its May 31, 2017, initial report, Otter Tail stated that it was unlikely to meet the small solar carve out from its customers' small distributed generation (DG), and would most likely rely on purchasing solar renewable energy credits (SRECs) from small solar facilities registered in M-RETS.

II. Review of Other Party Comments

The Department concluded in their June 6, 2017 comments that Otter Tail has met the compliance reporting requirements laid out in the Commission's SES Orders. Otter Tail appreciates the Department's comments on the Company's status toward the small SES.

Otter Tail appreciates comments filed from MnSEIA on the Company's SES, but respectfully maintains that comments specific to Otter Tail's strategy for meeting requirements of the SES and efforts in doing so are unrelated to this annual reporting docket. The Company further respectfully disagrees with the comments from MnSEIA that,

“Otter Tail has done very little to attain the compliance with the small-scale carve out, despite having years to utilize the Investment Tax Credit (“ITC”) to its benefit, and to the benefit of ratepayers.”

Otter Tail places the highest importance on compliance with legislation and resulting rules and orders from the Minnesota Public Utilities Commission. Otter Tail has taken careful effort to move forward with strategies to comply with all aspects of legislation creating Minnesota's Solar Energy Standard—including the overall 1.5% objective and the small solar “carve out” requiring that 10% of the 1.5% solar energy standard consists of electricity generated by solar PV systems sized at 40 kW or less in nameplate (DC) capacity. As stated in the Company's reply to the Commission's *Notice of Reporting Requirements and Comment Period in the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard (SES)*, Otter Tail has evaluated and developed a number of strategies and complied with all regulatory and legislative solar requirements to date, including:

- 1) Funding of the, Department administered, Made in Minnesota solar program in 2014, 2015, 2016, and 2017.
- 2) Voluntary development and DOC approval of Otter Tail's MN CIP Publicly-Owned Solar Program (POP), which pays a customer incentive of \$1,250/kW installed. The Company continues to work closely with the POP Solar program's target segment of municipal, county, state, and tribal governments; public school districts, and public colleges and universities on potential installations of small-scale solar PV systems.
- 3) Coordination of generation interconnection requests from customers who plan to install solar PV sized at 40 kW or less.
- 4) Evaluation of sites both on and off company-owned property as cost effective and educational sites for solar PV installations sized at less than 40 kW nameplate (DC) capacity.
- 5) Analysis of small solar PV market potential based on demographics unique to Otter Tail's rural Minnesota service territory.

MnSEIA states in its July 14, 2017 Comments of the Minnesota Solar Energy Industries Association that, “Accordingly, IOU's should recognize that SES compliance is an in-state initiative: it is pro-Minnesota. Pertinent language in Minn. Stat. § 216B.1691, subd. 2f(f) confirms this point:

[A] solar renewable energy credit associated with a solar photovoltaic device installed and generating electricity in Minnesota after August 1, 2013, but before 2020 may be used to meet the solar energy standard established under this subdivision”.

Otter Tail raises two important points related to MnSEIA's reference to Statute 216B.1691. First, the statute states, “A solar renewable credit associated with a solar photovoltaic device

installed and generating electricity in Minnesota after August 1, 2013, but before 2020 “**may**” be used to meet the solar energy standard established under this subdivision”. Otter Tail interprets any potential geographic reference to this section of statute as meaning that any renewable energy credits generated in Minnesota “**may**” be used to meet the solar energy standard, not that the solar renewable energy credits in Minnesota must exclusively be used for the purpose of meeting the solar energy standard.

Second, Otter Tail raises the dates in this section of statute as perhaps more pertinent to the solar energy standard. The useful life of a renewable energy credit retired for the purpose of meeting the renewable energy standards identified in Statute 216B.1691 extends through the year the REC is generated plus four additional years¹. As the statute was being considered in the 2013 legislative session, Otter Tail worked with the other Minnesota utilities to ensure the language included the August 2013 date so any solar production from solar facilities between August 2013 and December 2015, would be eligible for 2020 small scale compliance. Otter Tail consequently points to the language in 216B.1691 subd. 2f(f) identified by MnSEIA as language in the statute allowing utilities flexibility in retiring RECs generated from the time immediately following enactment of the referenced Statute extending through 2014 and 2015.

MnSEIA further states,

“Acquiring Solar Renewable Energy Credits (“SRECs”) to achieve compliance should not be done out of state, because it would hinder small solar development statewide, diminish the Minnesota economy, and harm public interest values, including IOU customer demands for clean energy options”.

Otter Tail recognizes MnSEIA’s position, but views the issues raised in by MnSEIA as separate issues which are not related to SES compliance. Otter Tail does not believe statute 216B.1691, subd.2f, establishing SES compliance, endorses a Minnesota-only approach in meeting SES compliance. As Otter Tail continues to focus on strategies to comply with the 1.5% Solar Energy Standard and the small scale carve-out; Statute 216B.1691, subd. 4, supports Otter Tail evaluating SREC purchases as a strategy to meet all aspects of the Solar Energy Standard. Specific discussion on Statute 216B.1691, subd. 4 is discussed later in these comments.

III. Benefits and Costs of Resources Shared Across Multiple States

Otter Tail is a multi-state jurisdictional utility serving customers across Minnesota, North Dakota, and South Dakota. All costs and benefits from generation resources; either company-owned, customer-owned, or purchase power agreements are shared by all customers in all states, regardless of where these generators are geographically located. Otter Tail sites generation at sites that have been determined to be the lowest costs available while still meeting the company’s strong reliability standards.

If Otter Tail can gain SRECs from solar systems owned by its North Dakota or South Dakota customers, Otter Tail plans to use these SRECs towards Minnesota SES compliance obligations.

¹ Minnesota Public Utilities Commission’s order point one from December 18, 2007, in Docket No. E999/CI-04-1616.

As always, Otter Tail plans to be in compliance with all energy mandates and goals at a least cost to all customers regardless of what state they reside in.

Otter Tail has a very successful green pricing program which has been implemented for over a decade. This program allows customers to subscribe to blocks of wind energy for a small premium on their electric bill. The program is offered to Otter Tail's customers in all three states, but the wind generation is from units primarily sited in southwestern Minnesota. Otter Tail does not designate the RECs from these systems to only be available to Minnesota customers, but instead we are inclusive of all our customers in each state.

IV. Minnesota's Renewable Energy Standard

Otter Tail's approach in meeting the carve out of the SES will be similar to meeting Minnesota's Renewable Energy Objective, aka Renewable Energy Standard (RES). Nearly all RECs used for Minnesota compliance are from wind generators sited in North Dakota, but Minnesota customers receive vast benefits from the ultra-low-price wind resources Otter Tail has procured. Minn. Stat. § 216B.1691 subd. 2f. (the Solar Energy Standard or SES) is a subdivision of the RES, Minn. Stat. § 216B.1691. The RES includes the following language in subd. 4, parts (a) and (d) for utilities meeting RES compliance:

“Subd. 4. Renewable energy credits.

(a) To facilitate compliance with this section, the commission, by rule or order, shall establish by January 1, 2008, a program for tradable renewable energy credits for electricity generated by eligible energy technology..... The program must treat all eligible energy technology equally and shall not give more or less credit to energy based on the state where the energy was generated or the technology with which the energy was generated.

(d) The commission shall require all electric utilities to participate in a commission-approved credit-tracking system or systems. Once a credit-tracking system is in operation, the commission shall issue an order establishing protocols for trading credits.”

Part (a) of the statute is very clear that all eligible energy technologies must be treated equally and shall not be given more or less credit regardless of what state the energy was generated or regardless of the technology with which the energy was generated. This clearly allows for RECs from any state to be eligible for compliance in Minnesota, and secondly RECs from solar systems SRECs are eligible to count towards compliance in Minnesota. Limiting eligibility of SRECs to Minnesota-only, could potentially create retaliation from other states. This could limit opportunities for Minnesotans in the future to sell SRECs to other states. In addition, it should be noted that the Minnesota policy makers were very deliberate in drafting this statute to ensure it did not discriminate or excessively burden interstate commerce which is protected by provisions of the United States' Interstate Commerce Clause.

Part (d) of the statute allows all electric utilities to participate in a commission-approved credit-tracking system. This statute led to the approval of the Midwest Renewable Energy Tracking System's (M-RETS) policies and protocols through a Commission led proceeding, Docket No.

E999/CI-04-1616. The Minnesota Public Utilities Commission (MPUC) issued an order October 9, 2007, requiring all Minnesota utilities to participate in M-RETS for tracking of RECs.

M-RETS is an organization used by multiple states for the tracking and retirement of RECs. Multiple utilities including Otter Tail have registered SRECs both large-scale and small-scale in M-RETS to be used for SES compliance. The M-RETS system is working as designed. Any deviation from the use of M-RETS would undermine the many years of work by numerous stakeholders to make M-RETS a credible tracking system.

V. Importing RECs into M-RETS

In addition to allowing SRECS from states participating in M-RETS towards SES compliance, Otter Tail believes precedence has been established to allow RECs or SRECs imported into M-RETS from other REC tracking systems. On October 20, 2014, in Docket No. E999/CI-04-1616, the MPUC ordered the following points:

The Commission will allow RECs imported from Michigan's renewable energy tracking system to be retired for compliance with the Minnesota RES as long as:

A. One REC equals one megawatt hour of renewable energy; and

B. The renewable energy facility otherwise meets Minnesota eligibility requirements, including those set forth below.

- 2. Utilities shall disclose in their annual REC retirement reports whether they have retired any RECs imported from the Michigan Renewable Energy Certification System, flagging any biomass or hydroelectric RECs.*
- 3. The Commission will allow the use of imported RECs for Minnesota RES compliance without a demonstration of deliverability.*

Otter Tail believes these rules apply to both RECs and SRECs since the RES statute is the governing statute for utility renewable energy compliance obligations. At this time, Otter Tail has no plans to import SRECs from another tracking system, but the Company believes this makes a strong argument that the MPUC has approved RECs from other states counting towards compliance as long as they meet the MPUC's definition of a REC.

VI. Conclusion

Otter Tail appreciates conclusions reached by the State of Minnesota Department of Commerce Docket No. E999/M-17-283 Notice of Reporting Requirements and Comment Period in the Matter of Utilities' Annual Reports on Progress in Achieving the Solar Energy Standard (SES), specifically comments that, "OTP has met the compliance reporting requirements laid out in the Commission's SES Orders."

The company respectfully disagrees with statements from MnSEIA that, “*Otter Tail has done very little to attain the compliance with the small-scale carve out, despite having years to utilize the Investment Tax Credit (“ITC”) to its benefit, and to the benefit of ratepayers.*”. Otter Tail has complied with funding the Made in Minnesota solar program through the Company’s Conservation Improvement Program (CIP); voluntarily developed and funded the Company’s own Publicly-Owned Property Solar (POPS) solar incentive program through CIP; analyzed market potential for small-scale solar PV systems in its service territory; and further evaluated other possible strategies to meet the small SES.

Otter Tail believes all SRECs tracked through M-RETS and meeting capacity requirements established in statute are eligible to count towards SES compliance. Compliance language establishing the SES is contained within the RES statute 216B.1691. This statute led to the MPUC establishing M-RETS, which has a long and successful history of tracking and retiring RECs for utility renewable energy compliance across multiple states. Otter Tail appreciates and recognizes the immense work done over many years by numerous stakeholders and the MPUC to establish M-RETS as a strong and transparent REC/SREC tracking system.

Otter Tail is available to answer any questions the Department or MPUC may have.

Dated: August 4, 2017

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON A. GRENIER

Jason A. Grenier

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CERTIFICATE OF SERVICE

**RE: In the Matter of Utilities' Annual Reports on Progress in Achieving the Solar
Energy Standard
Docket Number E999/M-17-283**

I, Jana C. Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service lists by electronic service or by first class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **4th** day of **August, 2017**.

/s/ JANA HRDLICKA

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