

June 2, 2017

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

RE: Response Comments of the Minnesota Department of Commerce, Division of Energy Resources
Docket No. E017/M-17-246

Dear Mr. Wolf:

On March 31, 2017, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its *Annual Filing of the Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider (Petition)*. That filing included a proposal to increase the Company's Conservation Cost Recovery Adjustment (CCRA) to \$0.00754 per kWh from the current \$0.00275 per kWh, an increase of 174 percent, effective October 1, 2017.

On May 1, 2017, the Minnesota Department of Commerce, Division of Energy Resources (Department) submitted comments that included a recommendation for the Minnesota Public Utilities Commission (Commission) to approve the proposed CCRA. In those Comments, the Department also recommended that the Company update its carrying charge rate to reflect the new short term cost of debt, beginning the month the Commission issues its Order in the Company's rate case in Docket No. E017/GR-15-1033.

On May 16, the Company filed Reply Comments agreeing with the Department's recommendations.

On May 19, the Midwest Large Energy Consumers (MLEC) filed comments stating that the proposed increase will coincide with two other rate increases—the increase to base rates and the Energy-Intensive-Trade-Exposed (EITE) Rider—and asked that the Commission spread out the CCRA over a minimum of two years to moderate impact to ratepayers.

The Department now submits these Response Comments to address MLEC's concerns.

The Department notes that avoiding rate shock is a goal that must be balanced with the goal of recovering charges as close to the incurred date as possible. This latter goal not only helps ensure that current ratepayers are the ones paying current costs, but it also avoids imposing these costs on future ratepayers not yet on the system. Further, the goal of maintaining an end-of-year tracker balance of as close to zero as possible minimizes carrying charges imposed on ratepayers (assuming an under-recovered tracker balance).

Typically, the Department tends to favor setting the CCRA at a rate that recovers CIP costs as closely as possible to the time they were incurred. This is especially true when the Company is carrying a large over- or under-recovered balance in the CIP Tracker, as is currently true for Otter Tail. While acknowledging that the CIP Tracker tends to be “lumpy” throughout the course of the year, and so may dip closer to zero at certain times, the Department notes that the Company has maintained a December year-end tracker balance close to \$5 million since 2010.

Table 1. Otter Tail’s Year-End CIP Tracker Balance December 31, 2010- December 31, 2016

	2010	2011	2012	2013	2014	2015	2016
Year-End Tracker Balance, December 31	\$3,721,665	\$5,188,129	\$3,572,621	\$4,835,558	\$5,731,183	\$4,333,061	\$4,835,852

Carrying a balance in this way is something the Department would like Otter Tail to avoid, and so would typically recommend an aggressive recovery timeframe.

However, the Department notes that the proposed rate increase will result in a fairly substantial bill increase for Large General Service customers in particular. Exhibit 2 of the Company’s initial filing contains following comparison of monthly bill impacts on each customer class, assuming a CCRA of \$0.00754:

Rate Class	Average kWh/Bill	Average S/Bill before CCRA	Monthly Impacts			
			Current CCRA	Proposed CCRA	Monthly Bill S Change	Monthly Bill % Change
Residential	803	\$81.96	\$2.21	\$6.05	\$3.85	4.69%
Farm	2,139	\$203.53	\$5.88	\$16.12	\$10.24	5.03%
General Service	2,661	\$249.14	\$7.32	\$20.06	\$12.75	5.12%
Large General Service	105,065	\$8,089.67	\$288.93	\$792.19	\$503.26	6.22%
Irrigation	1,617	\$138.76	\$4.45	\$12.19	\$7.74	5.58%
Outdoor Lighting	80	\$12.32	\$0.22	\$0.61	\$0.38	3.12%
Municipal Pumping	3,119	\$240.38	\$8.58	\$23.52	\$14.94	6.21%
Water Heating Control	219	\$17.05	\$0.60	\$1.65	\$1.05	6.15%
Interruptible Load	1,838	\$99.14	\$5.05	\$13.86	\$8.80	8.88%
Deferred Load	1,423	\$79.20	\$3.91	\$10.73	\$6.82	8.61%

Moreover, as MLEC pointed out, this rate increase would coincide with a 6 percent increase in base rates as a result of the Company’s rate case, as well as a potential 7 percent

increase relative to base rates as a result of the EITE Rate. The Department agrees with MLEC that the proposed CCRA increase, in conjunction these other increases, may be difficult for customers to absorb within the course of one year.

Finally, as the Department noted in its initial comments, this increase in the CCRA is not expected to be a regular or recurring phenomenon, but truly is a one-time occurrence due to the CIP-exemptions of two large customers.

Given these factors, the Department concludes that in this case, the goal of avoiding rate shock should be given more weight than the goal of recovering charges closer to the date incurred. Therefore, the Department asks that the Company submit a revised CCRA proposal that amortizes the recovery of the projected CIP tracker balance over the course of two years rather than a single year.

The Department originally recommended that the Company update its carrying charge rate applied in its CIP tracker to the new approved short-term cost of debt rate beginning the month of the Commission's final Order in Docket No. E017/GR-15-1033. As the Commission's Order in that Docket came out on May 1, 2017, the Department asks that the Company incorporate this recommendation in its response to these response comments.

The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/lt

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. E017/M-17-246

Dated this 2nd day of June 2017

/s/Sharon Ferguson

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