

PUBLIC VERSION

STATE OF MINNESOTA
BEFORE THE PUBLIC UTILITIES COMMISSION

Katie Sieben	Chair
Joseph K. Sullivan	Vice-Chair
Valerie Means	Commissioner
Matt Schuerger	Commissioner
John Tuma	Commissioner

In the Matter of an Investigation into Self-
Commitment and Self-Scheduling of Large
Baseload Generation Facilities

DOCKET NO. E999/CI-19-704

**REPLY COMMENTS OF THE OFFICE
OF THE ATTORNEY GENERAL**

INTRODUCTION

The Office of the Attorney General—Residential Utilities Division (“OAG”) respectfully submits the following Reply Comments in response to the Minnesota Public Utilities Commission’s (“Commission”) Notice of Extended Comment Period issued on March 16, 2021, which solicits comments on the adequacy and analysis of self-commitment and self-scheduling data reported on March 1, 2021, by Minnesota Power, Otter Tail Power Company (“Otter Tail”), and Northern States Power Company d/b/a Xcel Energy.

These Reply Comments respond to the Initial Comments of the Department of Commerce, Division of Energy Resources (“the Department”) and Sierra Club regarding Otter Tail’s operation of Big Stone plant and Coyote Station (“Coyote”). Coyote in particular has sustained large production cost losses in recent years, and its production costs have increased significantly since it began receiving deliveries under its current fuel supply agreement. The OAG recommends that the Commission require Otter Tail to include in its next IRP filing a scenario analyzing divestiture of its ownership interest in Coyote. The OAG also supports the Sierra Club’s recommendations to evaluate the prudence of Coyote’s fuel contract and to suspend recovery of future costs at Coyote mine until the Commission confirms that Otter Tail’s continued ownership of Coyote is in customers’ interests.

Figure 1, Coyote Station production cost net profit/loss (OTP Total Company)

Coyote Station production cost net profit(loss)			
Year	Production costs	MISO revenues	Net profit(loss)
[Trade secret data begins ...			
2013	\$22,476,578		
2014	\$22,897,825		
2015	\$19,576,827		
2016	\$26,797,757		
2017	\$29,341,883		
2018	\$31,551,423		
2019	\$31,093,598		
2020	\$27,743,813		
... trade secret data ends]			

Moreover, Figure 1 only includes *production costs*; Otter Tail recovers many more costs from customers related to Coyote Station, including depreciation expense, taxes, and return on rate base. When these costs are included, the total net losses related to the plant have been roughly double the production cost losses for Otter Tail’s Minnesota jurisdiction.⁷

II. OTTER TAIL SHOULD EXAMINE DIVESTMENT FROM COYOTE STATION IN ITS NEXT INTEGRATED RESOURCE PLAN.

In its Initial Comments, Sierra Club recommended that the Commission order Otter Tail to examine divestment of its ownership interest in one or both of its remaining coal units in its next Integrated Resource Plan (“IRP”) filing, which is currently due September 1, 2021. Specifically, Sierra Club argued,

The Commission should find that the record shows that the Big Stone and Coyote units’ co-ownership and operation in both the MISO and SPP markets has resulted in losses to customers, and require, as part of its 2021 IRP, that OTP evaluate whether it is in the best interest of customers for the Company to continue its ownership interest in the units.⁸

The OAG agrees that a divestiture analysis is warranted, especially with respect to Coyote Station. According to the most recent Ten-Year Capital Plan, the plant’s owners plan to spend over

[TRADE SECRET DATA BEGINS

TRADE SECRET DATA ENDS] on Coyote

⁷ See Docket No. E-017/GR-20-719, Direct Testimony of Andrew Twite at 55 (Apr. 2, 2021).

⁸ Sierra Club Initial Comments at 30.

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over the next decade.⁹ Further, Otter Tail projects a significant capacity surplus in the near term. The Company currently has a capacity surplus of [TRADE SECRET DATA BEGINS TRADE SECRET DATA ENDS], which the Company projects will increase to [TRADE SECRET DATA BEGINS TRADE SECRET DATA ENDS] by 2025. For comparison, Otter Tail’s share of Coyote Station’s accredited capacity in 2021 is 131 MW, meaning Otter Tail could divest its ownership in Coyote Station [TRADE SECRET DATA BEGINS TRADE SECRET DATA ENDS] without having to procure *any* replacement capacity.¹⁰ Otter Tail also has a unique opportunity to secure low-cost replacement energy by procuring new wind and/or solar generation at the Astoria Station site through MISO’s Surplus Interconnection Service process.¹¹

In light of Coyote Station’s large production cost losses and Otter Tail’s projected capacity surplus, the OAG recommends the Commission require Otter Tail to include in its September 1, 2021 IRP filing a scenario in which the Company divests its ownership interest in Coyote Station by the end of the 2022–2023 MISO planning year.

III. THE COMMISSION SHOULD EXAMINE THE PRUDENCE OF COYOTE STATION’S FUEL SUPPLY AGREEMENT AND SUSPEND RECOVERY OF FURTHER EXPENDITURES AT THE COYOTE MINE UNTIL OTTER TAIL DEMONSTRATES THAT ITS CONTINUED OWNERSHIP OF COYOTE STATION IS IN CUSTOMERS’ INTEREST.

In its Initial Comments, Sierra Club made several arguments regarding Coyote Station’s fuel supply agreement. First, Sierra Club argued that Otter Tail entered into the agreement without performing a net present value analysis of the 25-year contract or examining alternatives with lower fixed costs, and that the Commission has never reviewed and approved the terms of the contract.¹²

⁹ OTP response to Sierra Club IR 066, Attachment 2, included in Attachment 1, below.

¹⁰ OTP response to OAG IR 026 in Docket No. 20-719, included in Attachment 1, below.

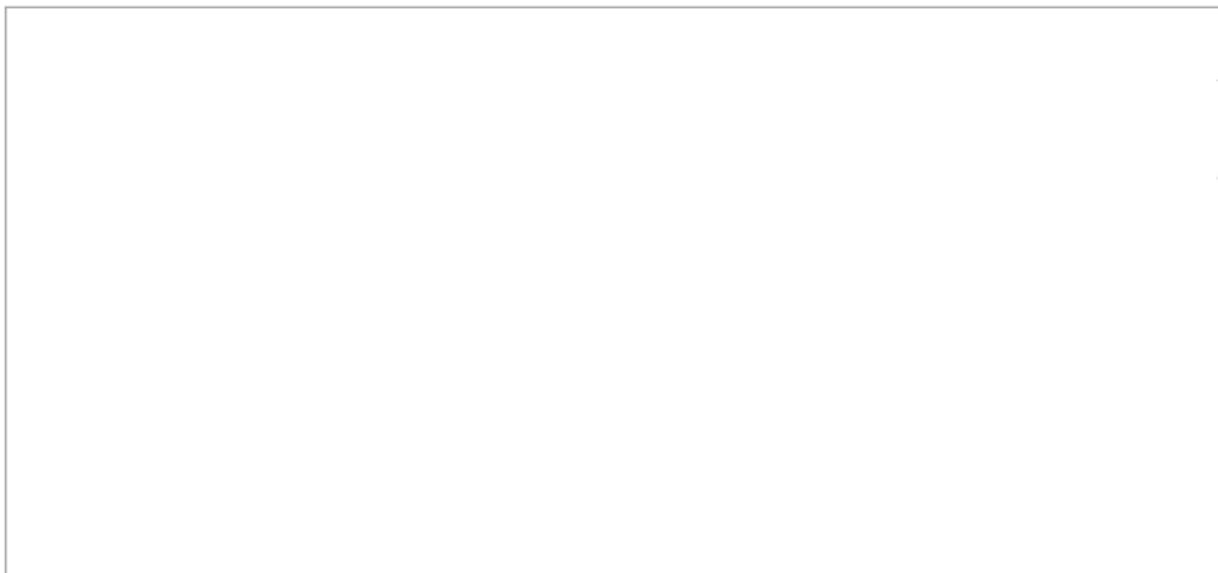
¹¹ Under the Surplus Interconnection Service process, an additional generating resource of equal or smaller size can be installed near the site of an existing generation resource and “share” the interconnection rights. The new resource would not receive capacity accreditation, but it has the benefit of avoiding long delays and potentially large interconnection costs in the MISO Interconnection Queue.

¹² Sierra Club Initial Comments at 23–24.

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This claim is concerning, especially considering the customer cost increases that have resulted from the new coal contract. Figure 2, below, shows the monthly production costs at Coyote Station before and after deliveries began under the new fuel contract, using data from January 2013 through December 2020.¹³ For comparison, Figure 2 also includes the average production costs at Big Stone over the same period.

Figure 2, OTP’s Minnesota jurisdiction average monthly production costs, 2013–2020
[TRADE SECRET DATA BEGINS ...



... TRADE SECRET DATA ENDS].

As the figure shows, Coyote’s production costs have increased considerably since the plant began receiving deliveries under the new fuel contract. Costs have increased in every season of the year, but they have been most pronounced in summer months. In Otter Tail’s current rate case, an OAG analysis found that Coyote Station’s production costs increased by *35 percent* after deliveries began under the new coal contract, even after controlling for the changes in generation and MISO market prices.¹⁴ Notably, Big Stone’s average costs have been virtually unchanged over this period.

¹³ Compiled by the OAG using data from OTP’s responses to OAG IRs 018 and 019 in Docket No. 20-719 (included in Attachment 1, below).

¹⁴ Docket No. E-017/GR-20-719, [Errata to the Direct Testimony of Andrew Twite](#) at 59–60 (Apr. 15, 2021).

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Sierra Club also argued that Otter Tail “signed this contract in 2012, during an era when many other utilities and coal generators were concerned about the forward-looking viability of the coal fleet in general” and that “over the last decade, the majority of coal plants have ceased holding long-term coal contracts, shifting to one- to three-year contracts or spot purchases.”¹⁵

This claim is also troubling. As Sierra Club noted, at the time the plant owners were negotiating the contract, the U.S. Energy Information Administration projected that “roughly one-sixth of the existing coal capacity in the U.S.” would be retired by 2020, as the result of “[l]ower natural gas prices, higher coal prices, slower economic growth, and the implementation of environmental rules.”¹⁶ The Minnesota Commission had also recently required Otter Tail to analyze the potential impact of environmental regulations on its operations.¹⁷ In fact, in the same month Otter Tail signed the coal supply agreement, it also filed a baseload diversification study for its Hoot Lake coal units that included an analysis of *eleven* separate federal regulations that could potentially impact its coal plants. Moreover, at the time, the Environmental Protection Agency was also developing regulations for greenhouse gas emissions. In short, at the same time it signed a 25-year contract with large fixed costs, the Company knew—or should have known—that the plant faced significant environmental regulatory risk over that period.

Finally, Sierra Club argued,

[Coyote’s fuel] contract also has a concerning provision that appears to require Otter Tail to buy certain assets at the mine itself upon contract termination. This type of provision – obligating a utility to purchase assets at a mine or take on liabilities

¹⁵ Sierra Club Initial Comments at 24–25.

¹⁶ U.S. ENERGY INFO. ADMIN., TODAY IN ENERGY: PROJECTED RETIREMENTS OF COAL-FIRED POWER PLANTS (July 31, 2012), available at <https://www.eia.gov/todayinenergy/detail.php?id=7330>.

¹⁷ The Commission’s February 9, 2012 order in Otter Tail’s 2010 IRP required the Company to perform a baseload diversification study for its Hoot Lake coal plant. See *In the Matter of Otter Tail Power Company’s 2011–2025 Resource Plan*, Docket No. E-017/RP-10-623, Order Approving Plan Subject to Conditions, Requiring Further Filings, and Setting Requirements for Next Resource Plan at 10 (Feb. 9, 2012). In imposing this requirement, the Commission noted that “environmental regulations are expected to become more stringent over the near and intermediate term” and required that “the study set forth the Company’s analysis of the costs of all Environmental Protection Agency rules that may affect its operations and its plans for compliance.” *Id.* at 5–6. The order also required that “the Company’s next resource plan include a comprehensive section on all Environmental Protection Agency rules that may affect its operations.” *Id.* at 6.

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associated with a mine (such as mine reclamation) upon contract termination – is rare and places significant risk on ratepayers.¹⁸

Again, if these statements are accurate, they are highly problematic, as Otter Tail would have assumed significant liabilities for a plant that was facing a plethora of market and regulatory challenges. More troubling, the Company apparently incurred this risk without performing a net present value analysis or getting Commission approval.

In light of these concerns, Sierra Club makes two recommendations regarding Coyote Station's fuel contract:

- Identify a docket (whether 19-704, the 2021 IRP, or a fuel clause adjustment docket) in which it will evaluate the reasonableness and prudence of the contract, and determine what portion of any early termination costs should be borne by customers versus ratepayers.
- Indicate that it will disallow from inclusion in fuel costs all forward-going expenditures on new assets or mine expansion activities at Coyote mine pending demonstration by the Company in the IRP that continued ownership of its share of the Coyote plant is in its customers' interests.¹⁹

The OAG supports these recommendations.

CONCLUSION AND RECOMMENDATIONS

Coyote Station has amassed enormous production cost losses in recent years, due in large part to the coal contract that took effect in May 2016. This contract—and the merits of Otter Tail's continued reliance on Coyote Station—deserves a thorough investigation. Accordingly, the OAG recommends that the Commission require Otter Tail to include in its September 1, 2021 IRP filing a scenario in which the Company divests its ownership interest in Coyote Station by the end of the 2022–2023 MISO planning year. Further, the OAG supports Sierra Club's recommendations that the Commission:

¹⁸ Sierra Club Initial Comments at 25 (footnote omitted).

¹⁹ *Id.* at 27.

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- Identify a docket (whether 19-704, the 2021 IRP, or a fuel clause adjustment docket) in which it will evaluate the reasonableness and prudence of the contract, and determine what portion of any early termination costs should be borne by customers versus ratepayers; and
- Indicate that it will disallow from inclusion in fuel costs all forward-going expenditures on new assets or mine expansion activities at Coyote mine pending demonstration by the Company in the IRP that continued ownership of its share of the Coyote plant is in its customers' interests.

Dated: June 1, 2021

Respectfully submitted,

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State of Minnesota

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OFFICE OF THE ATTORNEY GENERAL—
RESIDENTIAL UTILITIES DIVISION

PUBLIC DOCUMENT – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED
Response to Information Request MN-Sierra-056
Page 1 of 2

OTTER TAIL POWER COMPANY
Docket No: E999-CI-19-704

Response to: Sierra Club
Analyst: Laurie Williams
Date Received: April 06, 2021
Date Due: April 16, 2021
Date of Response: April 16, 2021
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

Refer to page 2 of Otter Tail Power’s Annual Compliance Filing dated March 1, 2021 in Docket No. E999/CI-19-704, section 2, relating to capacity accreditation requirements.

- a. What is Otter Tail Power’s current and projected capacity position for every year between now and 2025?
- b. What is Otter Tail Power’s projected summer peak load for every year between 2020 and 2025?
- c. What level of firm capacity does Otter Tail Power project will be available in the summer for every year between 2020 and 2025?
- d. Does Otter Tail Power currently have a capacity shortfall or surplus?
- e. Does Otter Tail Power project that the utility will have a capacity shortfall or surplus by 2025?

Attachments: 0

Response:

The information marked below contains “Protected Data”. The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

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Response to Information Request MN-Sierra-056
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a. Otter Tail Power's projected capacity position (MW):

	2021	2022	2023	2024	2025
	[PROTECTED DATA BEGINS...				
Capacity Requirement					
Firm Capacity					
Overall Position					

...PROTECTED DATA ENDS]

b. Summer peak (MW):

	2021	2022	2023	2024	2025
	[PROTECTED DATA BEGINS...				
Summer Peak					

...PROTECTED DATA ENDS]

c. Firm capacity (MW):

	2021	2022	2023	2024	2025
	[PROTECTED DATA BEGINS...				
Firm Capacity					

...PROTECTED DATA ENDS]

d. Otter Tail Power currently has a capacity surplus of [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS].

e. Otter Tail Power projects that it will have a capacity surplus of [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] in 2025.

NOTE: Since last year, Otter Tail has added its 49.9 MW Hoot Lake Solar facility to its capacity projection. Also, the Company’s most recent demand forecast has decreased since last year.

The above projected capacity position is based on MISO’s current *annual* capacity construct. It is likely that MISO will soon move to a *seasonal* construct that includes four seasons. While many of the elements of the new construct are yet to be determined, Otter Tail expects that this change will result in a significant decrease to its projected capacity surplus.

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Response to Information Request MN-Sierra-066
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OTTER TAIL POWER COMPANY
Docket No: E999-CI-19-704

Response to: Sierra Club
Analyst: Laurie Williams
Date Received: April 08, 2021
Date Due: April 19, 2021
Date of Response: April 21, 2021
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

For each unit at Big Stone and Coyote, provide the following broken down by project. Note whether each cost projection is in nominal or real dollars (and if so, the dollar year).

- a. Projected annual capital expenditures for each year 2021-2040.
- b. Provide a specific accounting of all projects and capital expenditures already scheduled or planned at Big Stone and Coyote through 2040.
- c. Provide a specific accounting of all projects and capital expenditures planned to comply with ELG and CCR regulations.

Attachments: 4

Attachment 1 to IR MN-Sierra-066_PUBLIC.pdf
Attachment 2 to IR MN-Sierra-066_PUBLIC.pdf
Attachment 3 to IR MN-Sierra-066_PUBLIC.pdf
Attachment 4 to IR MN-Sierra-066_PUBLIC.pdf

Response:

Attachments 1-4 to IR MN-Sierra-066 are “Protected Data” in their entirety. The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

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Response to Information Request MN-Sierra-066
Page 2 of 2

- a. Otter Tail provides Attachments 1 and 2 to IR MN-Sierra-066 which show the 10-year capital plans for Big Stone Plant and Coyote Station, respectively.
- b. The Big Stone Plant approved capital projects for 2021 are provided in Attachment 3 to IR MN-Sierra-066, and Coyote Station approved capital projects are provided in Attachment 4 to IR MN-Sierra-066.
- c. The projects related to the CCR rule have been completed. The boilers at Big Stone and Coyote and have been converted to dry ash handling, and the ponds related to the previous ash handling have been clean closed. Big Stone and Coyote do not discharge fly ash or bottom ash transport water and they utilize dry scrubbers and therefore there are no capital expenditures needed to comply with ELG.

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Attachment 1 to IR MN-Sierra-066
Pages 1 or 1

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Docket No. E999/CI-19-704
Attachment 1 to IR MN-Sierra-066
is CONFIDENTIAL in its Entirety

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Response to Information Request MN-OAG-002
Page 1 of 2

OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: December 16, 2020
Date Due: December 29, 2020
Date of Response: December 29, 2020
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

Complete the following table detailing the amount of MISO revenues the Company has received for the Coyote plant from 2016 through 2019.

OTP's share of MISO revenues received for Coyote Station						
Year	Energy market revenues	Ancillary services revenues	Congestion revenues	Capacity market revenues	Other revenues	Total revenues
2016						
2017						
2018						
2019						

Attachments: 0

Response:

OTP has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the "Protected Data"). The Protected Data is therefore "trade secret information" and "nonpublic data" under Minn. Stat. § 13.37.

Please see the table below, which provides the requested information on a total company (OTP Total) basis. Minnesota jurisdictional amounts of total revenues are presented in OTP's response to MN-OAG-003.

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Response to Information Request MN-OAG-002
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OTP also receives additional congestion revenues associated with monthly and annual financial transmission rights allocation. These revenues are returned to OTP on a portfolio basis and are not granular enough to specifically attribute to Coyote.

Coyote capacity is utilized to meet OTP's native load capacity requirements. All Coyote capacity sold in the annual MISO auction is repurchased at the same price to serve OTP's native load.

Other Revenues are the result of real-time make whole payments.

The OTP Total amounts above are reflective of OTP's 35% ownership share in Coyote Station.

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Response to Information Request MN-OAG-010
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OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: January 14, 2021
Date Due: January 27, 2021
Date of Response: January 27, 2021
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

For each of the following years, please provide the amount of MISO revenues the Company has received for Coyote Station:

- o 2013
- o 2014
- o 2015
- o 2020

Attachments: 0

Response:

OTP has taken reasonable efforts to maintain the secrecy of the information below marked as PROTECTED DATA, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the “Protected Data”). The Protected Data is therefore “trade secret information” and “nonpublic data” under Minn. Stat. § 13.37.

Please see the table below, which provides the requested information on a total company (OTP Total) basis in the same format as provided in MN-OAG-002. Minnesota jurisdictional amounts of total revenues are presented in OTP’s response to MN-OAG-011.

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Response to Information Request MN-OAG-010
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... PROTECTED DATA ENDS]

OTP also receives additional congestion revenue associated with monthly and annual financial transmission rights allocation. These revenues are returned to OTP on a portfolio basis and are not granular enough to specifically attribute to Coyote.

Coyote capacity is utilized to meet OTP's native load capacity requirements. All Coyote capacity sold in the annual MISO auction is repurchased at the same price to serve OTP's native load.

In 2013 OTP received congestion revenue and loss rebate revenue associated with MISO GFA Option B. The Option B congestion revenue is included in the Congestion Revenues column. The Option B loss rebate is included in the Other Revenues column.

In addition to the 2013 MISO GFA Option B loss rebate, Other Revenues are the result of real-time make whole payments.

The OTP Total amounts above are reflective of OTP's 35% ownership share in Coyote Station.

Response to Information Request MN-OAG-012
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OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: January 14, 2021
Date Due: January 27, 2021
Date of Response: January 27, 2021
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

For each of the following years, please provide the Company's total share of production expenses for the Coyote plant. "Production expenses" should include, at minimum, the categories listed on lines 19-33, page 402 of the Company's FERC Form 1 for the relevant year.

- o 2013
- o 2014
- o 2015
- o 2020

Attachments: 1

Attachment 1 to IR MN-OAG-012.pdf

Response:

Please refer to Attachment 1 to IR MN-OAG-012 for the production expenses for the Coyote Plant for 2013 through 2020 (estimated). Note that data for 2016 through 2019 was provided as Attachment 1 to MN IR-OAG-004.

Otter Tail Power
Coyote Station Production Expense
Years 2013-2019 and Preliminary 2020

Docket No. E017/GR-20-719
Attachment 1 to IR MN-OAG-012
Page 1 of 2

FERC Account	Total Company							
	2013	2014	2015	2016 (1)	2017 (1)	2018 (1)	2019 (1)	2020 (2)
5000 - Steam Power Generation - Operation supervision and engineering	659,992	575,273	666,178	687,662	658,763	672,858	713,848	763,053
5011 - Fuel Burned	15,360,813	16,223,301	12,850,945	17,335,855	21,414,875	22,354,695	20,886,825	20,338,559
5020 - Steam Power Generation - Steam expenses	1,629,635	1,622,964	1,500,255	2,024,793	2,090,396	2,259,379	1,852,118	1,952,052
5050 - Steam Power Generation - Electric expenses	707,943	613,038	595,615	561,010	597,848	716,082	703,625	725,159
5060 - Steam Power Generation - Miscellaneous steam power expenses	588,320	582,245	1,244,332	661,116	619,237	1,625,798	99,758	895,149
5070 - Steam Power Generation - Rents	438	438	3,108	4,521	73	7,828	16,352	-
5100 - Steam Power Generation - Maintenance supervision and engineering	245,557	274,571	302,666	333,489	294,736	287,420	341,239	307,119
5110 - Steam Power Generation - Maintenance of structures	345,581	271,623	351,819	243,575	263,602	293,163	223,367	247,700
5120 - Steam Power Generation - Maintenance of boiler plant	2,190,831	2,081,467	1,427,416	3,583,437	2,687,398	2,721,629	4,176,087	1,910,464
5130 - Steam Power Generation - Maintenance of electric plant	396,212	260,360	182,007	766,695	292,656	228,267	1,497,651	223,824
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	351,256	392,545	452,486	595,604	422,300	384,303	582,729	380,736
	22,476,578	22,897,825	19,576,827	26,797,757	29,341,883	31,551,423	31,093,598	27,743,813

(1) Years 2016 through 2019 were provided in prior IR request OAG-004 and 005

(2) As of the date of this IR, 2020 is preliminary and may not reflect the amounts that will be published on the FERC Form 1 later this year.

Otter Tail Power
Coyote Station Production Expense
Years 2013-2019 and Preliminary 2020

Docket No. E017/GR-20-719
Attachment 1 to IR MN-OAG-012
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FERC Account	MN Share							
	2013	2014	2015	2016 (1)	2017 (1)	2018 (1)	2019 (1)	2020 (2)
5000 - Steam Power Generation - Operation supervision and engineering	324,571	282,858	344,372	372,303	356,721	367,426	388,641	415,429
5011 - Fuel Burned	7,424,616	7,841,498	6,609,875	9,245,395	11,404,696	11,973,957	11,086,992	10,795,966
5020 - Steam Power Generation - Steam expenses	801,421	798,000	775,538	1,096,230	1,131,954	1,233,772	1,008,350	1,062,756
5050 - Steam Power Generation - Electric expenses	348,152	301,426	307,896	303,733	323,736	391,029	383,075	394,798
5060 - Steam Power Generation - Miscellaneous steam power expenses	289,324	286,286	643,242	357,931	335,318	887,795	54,311	487,346
5070 - Steam Power Generation - Rents	215	215	1,607	2,448	39	4,275	8,902	-
5100 - Steam Power Generation - Maintenance supervision and engineering	120,760	135,005	156,459	180,552	159,600	156,951	185,781	167,205
5110 - Steam Power Generation - Maintenance of structures	169,950	133,555	181,868	131,872	142,741	160,087	121,608	134,855
5120 - Steam Power Generation - Maintenance of boiler plant	1,058,933	1,006,073	734,190	1,911,085	1,431,199	1,457,800	2,216,720	1,014,098
5130 - Steam Power Generation - Maintenance of electric plant	191,508	125,844	93,615	408,887	155,857	122,268	794,972	118,808
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	169,779	189,736	232,736	317,642	224,900	205,846	309,320	202,099
	10,899,228	11,100,496	10,081,398	14,328,078	15,666,761	16,961,204	16,558,672	14,793,362

(1) Years 2016 through 2019 were provided in prior IR request OAG-004 and 005

(2) As of the date of this IR, 2020 is preliminary and may not reflect the amounts that will be published on the FERC Form 1 later this year.

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Response to Information Request MN-OAG-018
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OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: February 04, 2021
Date Due: February 17, 2021
Date of Response: February 17, 2021
Responding Witness: Christine Petersen, Manager, Regulatory Accounting , 218-739-8541

Information Request:

Reference: OTP's responses to OAG IRs 005 and 013.

Please provide the amount of total production expenses for Coyote Station that have been allocated to the Company's Minnesota jurisdiction in each month from January 2013 to December 2020. "Production expenses" should include, at minimum, the categories listed on lines 19-33, page 402 of the Company's FERC Form 1 for the relevant year.

Attachments: 1

Attachment 1 to IR MN-OAG-018_PUBLIC.pdf

Response:

Attachment 1 to IR MN-OAG-018 contains historic monthly, production expenses for Coyote Station, a jointly own generation plant (the "Protected Data"). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

Please refer to Attachment 1 to IR MN-OAG-018 for the MN share of Coyote Station production expenses by month for years 2013 through 2020.

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Attachment 1 to IR MN-OAG-018
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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2013												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												324,571
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												7,424,616
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												801,421
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												348,151
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												289,323
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												215
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												120,760
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												169,950
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,058,934
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												191,509
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												169,779
Total MN Share	[PROTECTED DATA BEGINS...]												10,899,230

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2014												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
	[PROTECTED DATA BEGINS...]												
5000 - Steam Power Generation - Operation supervision and engineering													282,857
5011 - Steam Power Generation - Fuel Burned													7,841,497
5020 - Steam Power Generation - Steam expenses													798,000
5050 - Steam Power Generation - Electric expenses													301,427
5060 - Steam Power Generation - Miscellaneous steam power expenses													286,286
5070 - Steam Power Generation - Rents													215
5100 - Steam Power Generation - Maintenance supervision and engineering													135,005
5110 - Steam Power Generation - Maintenance of structures													133,555
5120 - Steam Power Generation - Maintenance of boiler plant													1,006,072
5130 - Steam Power Generation - Maintenance of electric plant													125,844
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													189,736
Total MN Share													11,100,495
													...PROTECTED DATA ENDS]

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2015												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												344,372
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												6,609,875
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												775,537
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												307,895
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												643,241
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												1,607
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												156,459
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												181,868
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												734,190
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												93,615
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												232,736
Total MN Share	[PROTECTED DATA BEGINS...]												10,081,397
													...PROTECTED DATA ENDS]

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2016												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
	[PROTECTED DATA BEGINS...]												
5000 - Steam Power Generation - Operation supervision and engineering													372,303
5011 - Steam Power Generation - Fuel Burned													9,245,396
5020 - Steam Power Generation - Steam expenses													1,096,231
5050 - Steam Power Generation - Electric expenses													303,733
5060 - Steam Power Generation - Miscellaneous steam power expenses													357,930
5070 - Steam Power Generation - Rents													2,448
5100 - Steam Power Generation - Maintenance supervision and engineering													180,552
5110 - Steam Power Generation - Maintenance of structures													131,873
5120 - Steam Power Generation - Maintenance of boiler plant													1,911,085
5130 - Steam Power Generation - Maintenance of electric plant													408,887
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													317,642
Total MN Share													14,328,078
													...PROTECTED DATA ENDS]

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2017												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
	[PROTECTED DATA BEGINS...]												
5000 - Steam Power Generation - Operation supervision and engineering													356,721
5011 - Steam Power Generation - Fuel Burned													11,404,696
5020 - Steam Power Generation - Steam expenses													1,131,954
5050 - Steam Power Generation - Electric expenses													323,736
5060 - Steam Power Generation - Miscellaneous steam power expenses													335,318
5070 - Steam Power Generation - Rents													39
5100 - Steam Power Generation - Maintenance supervision and engineering													159,600
5110 - Steam Power Generation - Maintenance of structures													142,741
5120 - Steam Power Generation - Maintenance of boiler plant													1,431,200
5130 - Steam Power Generation - Maintenance of electric plant													155,857
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													224,900
Total MN Share													15,666,761
													...PROTECTED DATA ENDS]

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2018												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												367,426
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												11,973,957
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,233,772
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												391,029
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												887,795
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												4,275
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												156,950
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												160,086
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,457,800
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												122,268
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												205,846
Total MN Share	[PROTECTED DATA BEGINS...]												16,961,204

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	2019												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												388,641
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												11,086,992
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,008,350
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												383,075
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												54,312
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												8,902
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												185,781
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												121,608
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												2,216,720
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												794,972
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												309,320
Total MN Share	[PROTECTED DATA BEGINS...]												16,558,671
													...PROTECTED DATA ENDS]

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Otter Tail Power
Coyote Station
Production Expense by month MN Share

	January	February	March	April	May	June	2020 Final July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												415,625
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												10,795,966
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,063,127
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												394,798
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												498,556
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												136
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												167,205
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												134,855
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,014,098
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												118,808
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												181,103
Total MN Share	[PROTECTED DATA BEGINS...]												14,784,278

...PROTECTED DATA ENDS]

Year 2020 is now final, this amount is off slightly from prior IR response to OAG-012 due to 2020 at that time being preliminary.
The allocation to Minnesota Share for 2020 is using 2019 allocations since 2020 data is not available at this time

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Response to Information Request MN-OAG-019
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OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: February 04, 2021
Date Due: February 17, 2021
Date of Response: February 17, 2021
Responding Witness: Christine Petersen, Manager, Regulatory Accounting , 218-739-8541

Information Request:

Please provide the amount of total production expenses for Big Stone Plant that have been allocated to the Company's Minnesota jurisdiction in each month from January 2013 to December 2020. "Production expenses" should include, at minimum, the categories listed on lines 19-33, page 402 of the Company's FERC Form 1 for the relevant year.

Attachments: 1

Attachment 1 to IR MN-OAG-019_PUBLIC.pdf

Response:

Attachment 1 to IR MN-OAG-019 contains historic, monthly production expenses for Big Stone Plant, which is a jointly own generation plant (the "Protected Data"). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

Please refer to Attachment 1 to IR MN-OAG-019 for the Minnesota share of Big Stone Plant production expense by month for years 2013 through 2020.

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Attachment 1 to IR MN-OAG-019
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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2013												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												313,750
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												16,151,793
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												290,385
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												443,477
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												1,136,792
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												48
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												173,219
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												161,395
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,148,627
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												258,781
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												180,664
Total MN Share	[PROTECTED DATA BEGINS...]												20,258,932
													...PROTECTED DATA ENDS]

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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2014												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												300,099
5011 - Steam Power Generation - Fuel Burned													15,905,766
5020 - Steam Power Generation - Steam expenses													291,816
5050 - Steam Power Generation - Electric expenses													413,769
5060 - Steam Power Generation - Miscellaneous steam power expenses													1,244,166
5070 - Steam Power Generation - Rents													5
5100 - Steam Power Generation - Maintenance supervision and engineering													158,183
5110 - Steam Power Generation - Maintenance of structures													149,946
5120 - Steam Power Generation - Maintenance of boiler plant													1,199,250
5130 - Steam Power Generation - Maintenance of electric plant													329,005
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													210,406
Total MN Share													20,202,411
													...PROTECTED DATA ENDS]

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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2015												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												316,105
5011 - Steam Power Generation - Fuel Burned													9,979,722
5020 - Steam Power Generation - Steam expenses													298,736
5050 - Steam Power Generation - Electric expenses													304,929
5060 - Steam Power Generation - Miscellaneous steam power expenses													1,131,677
5070 - Steam Power Generation - Rents													30
5100 - Steam Power Generation - Maintenance supervision and engineering													163,130
5110 - Steam Power Generation - Maintenance of structures													282,521
5120 - Steam Power Generation - Maintenance of boiler plant													1,834,808
5130 - Steam Power Generation - Maintenance of electric plant													1,363,703
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													<u>206,831</u>
Total MN Share													15,882,193
													...PROTECTED DATA ENDS]

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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2016												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												351,657
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												14,610,216
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,200,545
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												483,997
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												1,247,435
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												-
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												194,256
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												318,555
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,455,834
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												293,562
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												190,368
Total MN Share	[PROTECTED DATA BEGINS...]												20,346,424

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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2017												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												337,447
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												14,528,479
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,284,472
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												449,856
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												1,369,507
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												-
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												201,334
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												360,240
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												1,554,597
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												231,432
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												178,345
Total MN Share	[PROTECTED DATA BEGINS...]												20,495,708
													...PROTECTED DATA ENDS]

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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2018												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												376,438
5011 - Steam Power Generation - Fuel Burned	[PROTECTED DATA BEGINS...]												13,752,089
5020 - Steam Power Generation - Steam expenses	[PROTECTED DATA BEGINS...]												1,417,786
5050 - Steam Power Generation - Electric expenses	[PROTECTED DATA BEGINS...]												467,190
5060 - Steam Power Generation - Miscellaneous steam power expenses	[PROTECTED DATA BEGINS...]												1,295,508
5070 - Steam Power Generation - Rents	[PROTECTED DATA BEGINS...]												-
5100 - Steam Power Generation - Maintenance supervision and engineering	[PROTECTED DATA BEGINS...]												228,813
5110 - Steam Power Generation - Maintenance of structures	[PROTECTED DATA BEGINS...]												245,733
5120 - Steam Power Generation - Maintenance of boiler plant	[PROTECTED DATA BEGINS...]												2,480,953
5130 - Steam Power Generation - Maintenance of electric plant	[PROTECTED DATA BEGINS...]												987,860
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant	[PROTECTED DATA BEGINS...]												181,298
Total MN Share	[PROTECTED DATA BEGINS...]												21,433,668
	[PROTECTED DATA BEGINS...]												...PROTECTED DATA ENDS]

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Docket No. E017/GR-20-719
Attachment 1 to IR MN-OAG-019
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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2019												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
5000 - Steam Power Generation - Operation supervision and engineering	[PROTECTED DATA BEGINS...]												338,539
5011 - Steam Power Generation - Fuel Burned													14,534,902
5020 - Steam Power Generation - Steam expenses													1,484,800
5050 - Steam Power Generation - Electric expenses													475,776
5060 - Steam Power Generation - Miscellaneous steam power expenses													1,351,787
5070 - Steam Power Generation - Rents													-
5100 - Steam Power Generation - Maintenance supervision and engineering													205,040
5110 - Steam Power Generation - Maintenance of structures													254,879
5120 - Steam Power Generation - Maintenance of boiler plant													1,285,740
5130 - Steam Power Generation - Maintenance of electric plant													138,267
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													193,895
Total MN Share													20,263,624
													...PROTECTED DATA ENDS]

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Attachment 1 to IR MN-OAG-019
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Otter Tail Power
Big Stone Plant
Production Expense by month MN Share

	2020												
	January	February	March	April	May	June	July	August	September	October	November	December	Total
	[PROTECTED DATA BEGINS...]												
5000 - Steam Power Generation - Operation supervision and engineering													315,181
5011 - Steam Power Generation - Fuel Burned													10,057,578
5020 - Steam Power Generation - Steam expenses													990,346
5050 - Steam Power Generation - Electric expenses													497,761
5060 - Steam Power Generation - Miscellaneous steam power expenses													1,006,744
5070 - Steam Power Generation - Rents													-
5100 - Steam Power Generation - Maintenance supervision and engineering													213,828
5110 - Steam Power Generation - Maintenance of structures													219,202
5120 - Steam Power Generation - Maintenance of boiler plant													1,156,976
5130 - Steam Power Generation - Maintenance of electric plant													265,823
5140 - Steam Power Generation - Maintenance of miscellaneous steam plant													180,606
Total MN Share													14,904,043

...PROTECTED DATA ENDS]

The allocation to Minnesota Share for 2020 is using 2019 allocations since 2020 data is not available at this time

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OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Andrew Twite
Date Received: May 03, 2021
Date Due: May 13, 2021
Date of Response: May 13, 2021
Responding Witness: Brian Draxten, Manager Resource Planning - (218) 739-8417

Information Request:

Reference: Gerhardson Rebuttal at 19: “Mr. Twite’s analysis also ignores that Coyote served a significant capacity function over the 2013-2020 period analyzed by Mr. Twite, and the facility was necessary to meet OTP’s resource adequacy requirements.”

A. Complete the following table detailing the Company’s capacity position from 2016-2021.

	2016	2017	2018	2019	2020	2021
MISO capacity requirement (MW)						
OTP cumulative UCAP (MW)						

B. Provide the Company’s share of Coyote’s UCAP (in MW) for each year from 2016 to 2021 (inclusive).

Attachments: 0

Response:

A.

	2013	2014	2015	2016	2017	2018	2019	2020	2021
MISO Capacity Requirement (MW)	663.7	668.7	743.1	772.7	794.3	754.7	743.6	724.1	700.7
OTP Cumulative UCAP (MW)	687.2	697.6	755	784.1	795.3	764	749.6	752	805.6

Response to Information Request MN-OAG-026

B.

	2013	2014	2015	2016	2017	2018	2019	2020	2021
OTP's Share of Coyote's UCAP	141.9	130.0	129.3	112.5	116.4	112.8	126.9	129.4	131.3



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Minnesota Attorney General Keith Ellison
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June 1, 2021

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

Re: *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*
Docket No. E-999/CI-19-704

Dear Mr. Seuffert:

Enclosed and e-filed in the above-referenced matter please find both the PUBLIC and TRADE SECRET Comments of the Minnesota Office of the Attorney General—Residential Utilities Division.

By copy of this letter all parties have been served. A Certificate of Service is also enclosed.

Sincerely,

/s/ Peter G. Scholtz

PETER G. SCHOLTZ

Assistant Attorney General

(651) 757-1473 (Voice)

(651) 296-9663 (Fax)

peter.scholtz@ag.state.mn.us

Enclosures

CERTIFICATE OF SERVICE

Re: *In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities*
Docket No. E-999/CI-19-704

I, JUDY SIGAL, hereby certify that on the 1st day of June, 2021, I e-filed with eDockets *both the PUBLIC and TRADE SECRET Comments of the Minnesota Office of The Attorney General—Residential Utilities Division* and served a true and correct copy of the same upon all parties listed on the attached service list by e-mail, electronic submission, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

/s/ Judy Sigal

JUDY SIGAL

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Alison C	Archer	aarcher@misoenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-704_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-704_Official
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-704_Official
Allen	Gleckner	gleckner@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, Minnesota 55102	Electronic Service	Yes	OFF_SL_19-704_Official
Kim	Havey	kim.havey@minneapolismn.gov	City of Minneapolis	350 South 5th Street, Suite 315M Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-704_Official
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-704_Official
Holly	Lahd	holly.lahd@target.com	Target Corporation	33 South 6th St CC-28662 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-704_Official
Leann	Oehlerking Boes	lboes@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-704_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Randy	Olson	rolson@dakotaelectric.com	Dakota Electric Association	4300 220th Street W. Farmington, MN 55024-9583	Electronic Service	No	OFF_SL_19-704_Official
Generic Notice	Residential Utilities Division	residential.utilities@eg.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-704_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_19-704_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Shane	Stennes	stennes@umn.edu	University of Minnesota	319 15th Avenue SE Minneapolis, MN 55455	Electronic Service	No	OFF_SL_19-704_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-704_Official
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-704_Official
Brian	Tulloh	btulloh@misenergy.org	MISO	2985 Ames Crossing Rd Eagan, MN 55121-2498	Electronic Service	No	OFF_SL_19-704_Official
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_19-704_Official