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April 10, 2023

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of a Commission Investigation into the Potential Role of
Third-Party Aggregation of Retail Customers
Docket No. E999/CI-22-600
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply 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@otpco.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 Commission
Investigation into the Potential
Role of Third-Party Aggregation of
Retail Customers**

**Docket No. E999/CI-22-600
REPLY COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) appreciates the opportunity to submit the following Reply Comments in the above-referenced docket concerning whether the Minnesota Public Utilities Commission (Commission or MPUC) should take action related to third-party aggregation of retail customers. After reviewing stakeholder Comments, Otter Tail is in alignment with the recommendations by the other electric utilities and the Minnesota Department of Commerce, Division of Energy Resources (Department). Otter Tail requests the Commission to reaffirm its previous Orders in Docket No. E-999/CI-09-1449, which prohibit third-party aggregation of retail customers in Minnesota without the consent of an electric utility.

II. BACKGROUND

The question of what place aggregators of retail customers (ARCs) have in Minnesota energy market is not new. The Commission previously addressed this issue in response to the October 2008 and July 2009, Federal Energy Regulatory Commission (FERC) Orders 719 and 719-A. Collectively the FERC Orders required transmission organizations to permit non-utilities to bid aggregated demand response resources directly into the Regional Transmission Organization's wholesale energy and ancillary services markets, unless the laws or regulations of the retail regulatory authority do not permit retail customers to participate. In response to the FERC Orders, the Commission opened an investigation in Docket No. E-999/CI-09-1449. In its May 18, 2010 Order in that docket the Commission prohibited the operation of ARCs in Minnesota's organized energy markets, citing concern over how they would fit into the regulatory structure and what mechanisms would be employed to ensure their actions are just, reasonable, and served the public interest.

On April 16, 2013, the Commission made a subsequent Order in Docket No. E-999/CI-09-1449. In that Order the Commission reaffirmed their decision “providing for ARCs to conduct demand response programs in Minnesota in conjunction with Minnesota utilities.” Since the Commission’s April 2013 Order, Otter Tail has not been contacted by any ARCs interested in working in conjunction on Demand Response (DR) customer programs and Otter Tail has not initiated any discussions with ARCs to work on DR projects. Otter Tail believes its DR portfolio is very robust and has not found an opportunity where ARCs can provide further value to our customers.

In Docket No. E002/M-21-101, the Commission permitted the participation of third-party aggregators in an Xcel Energy pilot program as a means to achieve the utility’s DR program requirements, as previously ordered by the Commission.

On March 13, 2023, Otter Tail and other stakeholders provided Comments to the Commission in Docket No. E999/CI-22-600. Otter Tail’s comments pointed to the depth and breadth of demand response offerings the Company offers and supported the Commission’s prior decision to only allow ARCs to participate in Minnesota when they work in conjunction with an existing electric utility.

III. OTTER TAIL’S REPLY COMMENTS

Otter Tail’s Reply Comments primarily focus on the Department’s March 13, 2023 Comments, which recommended the Commission:

1. not permit ARCs to bid DR into organized markets;
2. take no action regarding tariffs that allow ARCs to participate in utility DR programs at this time; and
3. take no action regarding verifying or certifying ARCs for DR at this time.

Otter Tail agrees with the Department that ARCs should not be permitted to bid DR into organized markets. As noted by the Department, utilities already offer a significant amount of DR and there is no need or opportunity for ARCs. Furthermore, Otter Tail agrees with the Department’s position, “it is reasonable to expect ARCs to result in new resource acquisitions and/or higher retail rates.”

Otter Tail agrees with the Department that no action is necessary by the Commission to require utilities to create tariffs that would allow for ARCs to participate in utility demand response programs.

Otter Tail also agrees with the Department's third recommendation that the Commission take no action regarding verifying or certifying ARCs for DR. Otter Tail maintains its initial position that if ARCs are deemed to provide electric services, they should be determined to be a public utility and be subject to the same regulatory rules and procedures as other public utilities.

IV. LEGAL AND RELATED ISSUES

Otter Tail disagrees with the Department's legal analysis in so far as it declines to conclude that ARCs are acting as public utilities or otherwise providing electric service subject to Commission jurisdiction. Likewise, Otter Tail disagrees with Comments from the Sierra Club / Union of Concerned Scientists (Sierra Club), that assert that under Minnesota law ARCs are not public utilities or providers of electric service.

Otter Tail believes it is not necessary for the Commission to make a definitive conclusion on these questions to reaffirm its prior Orders. The concerns posed by third-party aggregators remain largely unchanged; the services that ARCs provide would have significant impacts on an electric utility's system operations, utility resource planning, impact on utility fuel costs to all customers, customer billings, and conservation and optimization offerings.

If the Commission addresses these issues, it can reasonably conclude that ARCs independently operating in Minnesota would be a public utility under §216B.02, Subd. 4.¹ As the Department noted in its Comments:

[T]o implement aggregated DR, it seems likely that an ARC would have to install equipment for "measuring" electricity in order to monitor the amount of DR resulting from the customers' electricity usage. Installation of this equipment would arguably make DR a "service" that the ARC is providing to customers. Because the ARC would be operating, maintaining or controlling this equipment for the purpose of providing DR aggregation service to customers, it would meet the definition of a public utility. In other words, the statutory language does not expressly require that, in order to be a public utility, the entity must provide gas or electricity, but rather, only equipment used to measure gas or electricity.

¹ Minnesota Statutes § 216B.02, subd. 4, defines a public utility as meaning "persons, corporations, or other legal entities, their lessees, trustees, and receivers, now or hereafter operating, maintaining, or controlling in this state equipment or facilities for furnishing at retail natural, manufactured, or mixed gas or electric service to or for the public or engaged in the production and retail sale thereof.... The term "service" is defined as "natural, manufactured, or mixed gas and electricity; the installation, removal, or repair of equipment or facilities for delivering or measuring such gas and electricity." Minnesota Statutes § 216B.02, subd. 6.

The Department characterized this a technical argument; Otter Tail believes it is more than that. ARCs operate and control equipment in relation to consumption of electric service at a retail customer's premise. For accuracy of payment to the retail customer, ARCs must measure consumption prior to a control event and immediately after a control event to effectively calculate the amount of DR delivered to the market. Managing a retail customer's consumption both up and down through control equipment and measuring the electricity throughout the events is consistent with services provided by a public utility under Minn. Stat. §216B.02, Subd. 4.²

Moreover, the Commission can reasonably conclude that independently operating ARCs would in fact provide "electric service" under Minn. Stat. §216B.38, Subd. 4 which references electric service for "ultimate consumption".³

The Department questioned the nexus to consumption, stating that, "[i]t is difficult to think of ARCs as providing anything to their customers 'for consumption.' Rather, the customers are providing DR to the ARC, which the ARC is able to sell into the wholesale market."⁴ The Sierra Club argues that demand response "is not consumed – it reflects the absence of consumption or non-consumption."⁵

These conclusions do not recognize the significant impact ARC services have on retail customer consumption by modifying and managing the customer's consumption. ARCs rely on the utility to provide electricity so they can reduce the customer's consumption. The customer's consumption, however, is not only reduced as the Sierra Club claims; it is shifted to a later time. The ARC model reduces customer consumption at times and at other times allows for customer consumption. Since the ARC determines the timing and the amount of customer consumption to be allowed, there is an irrefutable nexus to consumption under §216B.38, Subd. 4a.

Finally, in its Comments the Sierra Club contends that "the Commission may only prohibit ARCs if ARCs fall within the Commission's existing regulatory authority. Sierra Club has not identified any statute providing the Commission with authority to prohibit or regulate ARCs."⁶ Otter Tail disagrees with the Sierra Club for reasons previously identified. Moreover, the reasons supporting the Commission's prior Orders concerning

² The Department hesitated to conclude ARC were public utilities under the statute, noting tension with the definition of "electric service" under Minn. Stat. § 216B.38 and the Commission's definition of electric utility under resource planning rules. In Otter Tail's view perceived tensions among statutory definitions should be construed against ARCs participating in organized energy markets. To the extent a Commission rule seems in tension with a statutory definition the Commission can look to the statute.

³ Subd. 4a. Electric service. "Electric service" means electric service furnished to a customer at retail for ultimate consumption, but does not include wholesale electric energy furnished by an electric utility to another electric utility for resale.

⁴ Department Comments at p. 5.

⁵ Sierra Club Comments at p.6.

⁶ Sierra Club Comments at p. 6.

ARCs have not changed, and the Commission maintains broad quasi-judicial and quasi-legislative authority⁷ to interpret debatable legal points in light of the public's interest.

V. CONCLUSION

Otter Tail agrees with the comments provided by all other electric utilities in this docket. The Company also agrees with the Department's three recommendations made to the Commission.

1. not permit ARCs to bid DR into organized markets;
2. take no action regarding tariffs that allow ARCs to participate in utility DR programs at this time; and
3. take no action regarding verifying or certifying ARCs for DR at this time,

Otter Tail believes the Commission need not make any new decision points in this docket and that it should simply reaffirm their previous Orders from May 18, 2010, and April 16, 2013, in Docket No. E-999/CI-09-1449 restricting ARCs from operating in Minnesota without working in conjunction with Minnesota utilities.

Otter Tail has aggressively pursued the development of DR resources and the Company's DR portfolio is used frequently for capacity, contingency, and economic control events which help to manage the grid and to save customers money on pass through energy cost adjustment charges. The entrance of ARCs into the marketplace will disrupt current DR resources, create customer confusion, and add administrative burden for the utility. For these reasons Otter Tail does not support the Commission allowing third-party aggregators to enter the Minnesota energy market without partnering with a utility. Otter Tail further does not support requiring utilities to create tariffs for third-party aggregators. Otter Tail is open to working with the Commission and others to ensure the DR programs it pursues are the most cost-effective DR program options available.

⁷ "The functions of the commission shall be legislative and quasi-judicial in nature. It may make such investigations and determinations, hold such hearings, prescribe such rules, and issue such orders with respect to the control and conduct of the businesses coming within its jurisdiction as the legislature itself might make but only as it shall from time to time authorize. It may adjudicate all proceedings brought before it in which the violation of any law or rule administered by the Department of Commerce is alleged."

Dated: April 10, 2023

Respectfully submitted,

OTTER TAIL POWER COMPANY

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CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Investigation into the Potential Role of Third-Party Aggregation of Retail Customers
Docket No. E999/CI-22-600**

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
Reply Comments**

Dated this **10th** day of **April, 2023**.

/s/ STACY WAHLUND
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