

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)



August 12, 2020

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

RE: In the Matter of Otter Tail Power Company 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2020
Docket No. E017/M-20-401
Initial Comments

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) provides these Comments in response to the April 20, 2020 Notice of Comment Period issued by the Minnesota Public Utilities Commission (Commission) in the above referenced docket.

Otter Tail submits the following Comments specifically to topic number 2.

2. *Should the Commission approve Minnesota Power's, Otter Tail Power's, and Xcel Energy's proposed transition from a rolling five year average to set reliability standards to benchmarking to the IEEE Reliability Working Group? Please discuss:*
 - a. *Time lag of IEEE benchmarking data.* As described below and after further consideration, a five year average, from benchmark data, will help normalize year to year variability due to large scale annual events that aren't normalized with the IEEE 2.5 Beta process, used to identify major event days.
 - b. *Xcel's proposal to use a 5 year average of IEEE 2nd quartile results vs Otter Tail Power and Minnesota Power's proposals to use the prior year's benchmarking results, and keeping standards consistent between utilities.* Otter Tail realizes the benefits of keeping standards consistent between utilities and agrees to utilize a 5 year average of IEEE 2nd quartile threshold (Median) SAIDI, SAIFI, and CAIDI values for "Medium" sized respondents. After consideration, a 5 year average will normalize variability from year to year due to large scale annual events that aren't normalized with the IEEE 2.5 Beta process, used to identify major event days.

- c. *The move from reporting reliability results for each work center, to the state as a whole, and whether utilities need a variance to Minn. Rules 7826.0500 Subp 1 A-C, and Subp 2.* As described in our filing, Otter Tail utilizes collaborative efforts to restore service to our customers across our vast rural regions. Transitioning the report to include our entire Minnesota service territory will more accurately reflect our restoration efforts. Also, IEEE benchmark survey data, used to establish our reliability standards, utilizes survey data from approximately 90 different utilities providing reliability results for their entire service territory so reporting for all our Minnesota service territory would provide more comparable results.

Regarding whether a variance from the Minnesota Rules is necessary, since this transition would allow us to report on only our assigned service areas as a whole and not by work center, Otter Tail requests the Commission grant a variance to the language of the specified rules.

- d. *The choice of using the IEEE working group vs EIA data for benchmarking.* As stated in 2(b.) above, Otter Tail realizes the benefits of keeping standards consistent between utilities and agrees to utilize a 5 year average of IEEE 2nd quartile threshold (Median) SAIDI, SAIFI, and CAIDI values for “Medium” sized respondents.

Otter Tail appreciates the Commission including utilities in these discussions and this opportunity to comment. Please contact me at (218) 739-8565 or mriewer@otpc.com if you have any questions regarding these Initial Comments.

Sincerely,

/s/ MICHAEL RIEWER
Michael Riewer
Manager System Infrastructure/Reliability

cjh
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2020
Docket No. E017/M-20-401**

I, Carly Haiby, 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
Initial Comments**

Dated this 12th day of August, 2020

/s/ CARLY HAIBY

Carly Haiby, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_20-401_M-20-401
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-401_M-20-401
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_20-401_M-20-401
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-401_M-20-401
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_20-401_M-20-401
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-401_M-20-401
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-401_M-20-401
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-401_M-20-401
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-401_M-20-401
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-401_M-20-401

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Wendi	Olson	wolson@otpco.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_M-20-401
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-401_M-20-401
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-401_M-20-401
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_20-401_M-20-401
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_M-20-401
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_20-401_M-20-401