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June 16, 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 2016 Conservation Cost Recovery Adjustment and 2016 Electric Demand Side Management Financial Incentive Docket No. E017/M-17-246
Reply Comments in Response to Minnesota Department of Commerce Comments**

Dear Mr. Wolf:

Otter Tail Power (Otter Tail) provides the following Reply Comments to the Department of Commerce (Department). Otter Tail's Reply Comments attempt to bring clarity to the record in regards to the overall rate impacts to the Large General Service (LGS) and residential classes; from the proposed CIP CCRA, its latest general rate case, and the potential Energy Intensive Trade Exposed rider which is currently before the Minnesota Public Utilities Commission (MPUC) for approval. Otter Tail's Reply Comments also include an analysis showing the recovery of the outstanding CIP balance over two years as requested by the Department.

Based on the analysis supplied in these Reply Comments, Otter Tail still supports the Department's **initial** comments issued on May 1, 2017, which recommended:

1. Approving the Demand Side Management (DSM) financial incentive of \$5,031,678.
2. Approving recoveries and expenditures in the Company's CIP tracker account during 2016 resulting in a year-end 2016 balance of \$4,835,852;
3. Approving a 2017/2018 Conservation Cost Recovery Adjustment (CCRA) of \$0.00754/kWh for bills rendered on and after October 1, 2017;
4. Approving the request for a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the Fuel Clause Adjustment (FCA) with the Conservation Improvement Adjustment on customer bills; and
5. Requiring Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Mr. Wolf
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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

jch
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 2016
DEMAND SIDE MANAGEMENT FINANCIAL INCENTIVE PROJECT
AND ANNUAL FILING TO UPDATE THE CONSERVATION
IMPROVEMENT PROGRAM (CIP) RIDER.**

**DOCKET NO. E017/M-17-246
June 16, 2017**

I. Background

Otter Tail Power Company (Otter Tail or the Company) respectfully responds to the Minnesota Department of Commerce, Division of Energy Resources (Department or Staff) Response Comments in Otter Tail's 2016 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Program (CIP) Rider.

On May 1, 2017, the Department recommended:

1. *Approving the Demand Side Management (DSM) financial incentive of \$5,031,678;*
2. *Approving the recoveries and expenditures in the Company's CIP tracker account during 2016 resulting in a year-end 2016 balance of \$4,835,852;*
3. *Approving a 2017/2018 Conservation Cost Recovery Adjustment (CCRA) of \$0.00754/kWh for bills rendered on and after October 1, 2017;*
4. *Approving the request for a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the Fuel Clause Adjustment (FCA) with the Conservation Improvement Adjustment on customer bills; and*
5. *Requiring Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with reviewed tariff sheets reflecting the Commission's determinations in this matter.*

Otter Tail issued Reply Comments on May 16, 2017, agreeing to all five points of the Department's May 1, 2017 Response Comments, as listed above.

The Midwest Large Energy Consumers (MLEC) offered late-filed Reply Comments in this proceeding on May 19, 2017. Comments by the MLEC were submitted,

“not to challenge the amount of recovery or the financial incentive included therein, rather to address timing or recovery and Otter Tail's Conservation Cost Recovery Adjustment (CCRA) to be set as of October 1, 2017.”

MLEC's comments requested the CIP CCRA be set to recover the outstanding CIP tracker balance over a two-year period instead of the one-year period Otter Tail proposed in its initial filing. MLEC raised concerns regarding rate increases due to Otter Tail's existing rate case interim rates of 9.56 percent, an approximate 6 percent rate increase due to final rates in its general rate case, and a 7 percent increase stemming from the proposed CCRA and proposed Energy Intensive Trade Exposed (EITI) rider. Otter Tail will add some necessary clarity to these figures later in these comments.

On June 2, 2017, the Department issued Response Comments changing its position from supporting Otter Tail's proposed CCRA recovering outstanding costs over one-year to agreeing with the MLEC's position to moderate the CCRA and recover costs over two-years. The Department changed its position due to the belief the combination of the CCRA and other increases "may be difficult for customers to absorb within the course of one year" and "the goal of avoiding rate shock". Otter Tail's analysis later in these comments will show these concerns are much less impactful when looked at in total.

II. Rate Impacts to Customers

In 2016, Otter Tail and its customers attained an all-time high, cost-effective energy savings of 57,504,891 kWh, exceeding the goal by 78 percent. The reality of achieving higher energy savings goals include the corresponding costs and incentives which are recovered through the CCRA.

Otter Tail provides the following analysis to add clarity to the record regarding the total impacts to customers during the 12-month CIP recovery period for the proposed CCRA.

Interim rates of 9.56 percent will have been in place for approximately 18-months once Otter Tail's General Rate Case, Docket No. E017/GR-15-1033, concludes. Customers will see over a 3 percent decrease in rates once final rates from the general rate case are implemented in the fall of 2017. In addition, customers will receive an 18-month period interim rate refund once final rate case rates go into effect. The refund is the difference between the interim rate of 9.56 percent and the final MPUC approved increase of 6.27 percent which results in a 3.29 percent refund. The refund, annualized over the 12-month CIP recovery period, equates to a 4.93 percent refund.

The proposed EITE rate was recently filed with the MPUC. If approved, it will result in a 0.544 percent increase to customers, with some Large General Service (LGS) customers being exempt without having to pay any of the associated costs. Please see Table 1 for the total impact to customers due to the rate case, the proposed EITE rate, and the proposed CCRA.

Table 1

Cost Recovery Mechanism	LGS Impact % Annual Increase 2017-18	Residential Impact % Annual Increase 2017-19	Notes
OTP Proposed CCRA \$0.00754/kWh	6.22%	4.69%	E017/M-17-246 - Proposed
Final General Rate Case Increase	6.21%	6.58%	Per MPUC Order GR-15-1033
End of Interim Rates	-9.56%	-9.56%	Per GR-15-1033
Interim Rate Refund	-4.93%	-4.93%	18-month collection annualized.
Proposed EITE rate	0.54%	0.54%	Some LGS customers exempt
Total Impact to Customers	-1.52%	-2.68%	

Table 1 includes all items referenced in the MLEC’s comments¹. MLEC’s comments did not consider the removal of interim rates and the significant interim rate refund customers will receive once final rates go into effect. With the inclusion of Otter Tail’s proposed CCRA rate of \$0.00754/kWh, the LGS and residential customers’ bills result in an overall decrease. For this reason, Otter Tail maintains the proposed CCRA rate is appropriate and all costs should be recovered over a 12-month period. This recovery remains consistent with the Department’s goal of ensuring that current ratepayers pay current costs and avoids imposing these costs on future ratepayers not yet on the system.

III. Analysis of Department’s Requested Two-Year Recovery of CIP

Otter Tail has included Attachment 1 to these comments to show the monthly balance of the CIP tracker account under two scenarios. Page 1 of Attachment 1, includes the CIP tracker account forecast based on Otter Tail’s proposed CCRA with an updated carrying charge of 2.55 percent starting in May 2017 per the Department’s recommendation. After a one-year collection using the proposed CCRA rate of \$0.00754/kWh, the rate is forecasted to decrease by nearly 60 percent to \$0.00312/kWh for the next 12-month period and should remain stable going forward.

Page 2 of Attachment 1 includes the CIP tracker account forecast based on the MLEC’s two-year recovery proposal with an updated carrying charge rate of 2.55 percent. The two-year recovery scenario results in a CCRA of \$0.00536/kWh for the 24-month period.

IV. Conclusion

Otter Tail maintains its position, agreeing with the Department’s initial comments issued on May 1, 2017, which recommended:

1. Approving the DSM financial incentive of \$5,031,678;
2. Approving the recoveries and expenditures in the Company’s CIP tracker account during 2016 resulting in a year-end 2016 balance of \$4,835,852;

¹ In addition to the items the MLEC identified, there will be an increase to the Renewable Resource Adjustment (RRA) of approximately \$1.7 million starting in December 2017, with an additional \$1.8 million to be collected in 2018. Including these items with Table 1 items, still results in nearly an overall zero net impact for Otter Tail’s Minnesota customers for the proposed 12-month recovery period.

3. Approving a 2017/2018 CCRA of \$0.00754/kWh for bills rendered on and after October 1, 2017;
4. Approving the request for a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the FCA with the Conservation Improvement Adjustment on customer bills; and
5. Requiring Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Table 1 above clearly shows the customer impact from Otter Tail's proposed CCRA does not result in an overall increase to customers' bills when considering all recovery mechanisms, the MLEC referenced. During the 12-month recovery of CIP costs through Otter Tail's proposed CCRA, both LGS and residential customers will see a 1.5 to 2.68 percent **decrease** in costs, even if the EITI rate is approved by the MPUC. Otter Tail wants to avoid carrying a large CIP tracker balance and would not expect our customers to carry a similar balance for Otter Tail. Otter Tail believes this analysis provided in these comments supports the proposed CCRA and should mitigate any concerns of rate shock to customers.

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

Dated: June 16, 2017

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON A. GRENIER

Jason A. Grenier

Manager, Market Planning

Otter Tail Power Company

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MN CIP TRACKER (for Balance Sheet)

2017 Budget	January	February	March	April	May	June	July	August	September	October	November	December	Total
Beginning of Period Balance (Acct. 1860)	4,835,851.66	4,090,275.25	3,811,056.02	3,904,853.35	3,592,371.77	3,495,460.58	3,372,786.96	3,100,450.19	2,777,767.70	7,956,744.73	7,594,717.00	7,058,307.58	4,835,851.66
Rate	0.79%	0.79%	0.79%	0.79%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	
Monthly Carrying Charge Rate	0.06583%	0.06583%	0.06583%	0.06583%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	
Monthly Carrying Charge	3,183.60	2,692.76	2,508.95	2,570.70	7,633.79	7,427.85	7,167.17	6,588.46	5,902.76	16,908.08	16,138.77	14,998.90	93,721.79
CIP Program Charges	396,105.97	463,121.68	817,287.66	351,074.24	457,247.61	434,715.02	333,111.72	305,961.47	753,090.17	579,341.07	534,548.04	2,093,745.36	7,519,350.00
Approved Previous Year Financial Incentive									5,031,678.00				5,031,678.00
Less: CIP Recovery thru Base Rates (Acct. 5119)	(422,573.77)	(288,372.04)	(279,355.43)	(256,317.14)	(216,170.75)	(217,334.31)	(235,726.83)	(244,429.48)	(235,372.15)	(281,549.07)	(319,397.18)	(360,755.42)	(3,357,353.57)
Less: Conservation Surcharge (CIP Revenue) (Acct. 1860)	(722,292.21)	(456,661.63)	(446,643.85)	(409,809.38)	(345,621.84)	(347,482.18)	(376,888.83)	(390,802.94)	(376,321.75)	(676,727.80)	(767,699.05)	(867,107.19)	(6,184,058.66)
End of Period Balance	4,090,275.25	3,811,056.02	3,904,853.35	3,592,371.77	3,495,460.58	3,372,786.96	3,100,450.19	2,777,767.70	7,956,744.73	7,594,717.00	7,058,307.58	7,939,189.22	7,939,189.22
Conservation Surcharge	0.00275	0.00275	0.00275	0.00275	0.00275	0.00275	0.00275	0.00275	0.00275	0.00536	0.00536	0.00536	

2018 Budget	January	February	March	April	May	June	July	August	September	October	November	December	Total
Beginning of Period Balance (Acct. 1860)	7,939,189.22	6,829,290.30	6,054,677.10	5,645,676.59	4,869,576.62	4,374,753.73	3,850,191.61	3,140,906.59	2,363,650.95	4,029,382.71	3,649,357.27	3,095,030.57	7,939,189.22
Rate	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	
Monthly Carrying Charge Rate	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	
Monthly Carrying Charge	16,870.78	14,512.24	12,866.19	11,997.06	10,347.85	9,296.35	8,181.66	6,674.43	5,022.76	8,562.44	7,754.88	6,576.94	118,663.58
CIP Program Charges	275,452.44	588,772.42	820,437.57	352,427.32	459,009.89	436,390.46	334,395.56	307,140.67	755,992.65	581,573.91	536,608.25	2,101,814.86	7,550,016.00
Approved Previous Year Financial Incentive									1,955,200.00				1,955,200.00
Less: CIP Recovery thru Base Rates (Acct. 5119)	(411,983.58)	(404,836.92)	(364,998.49)	(335,094.77)	(283,283.64)	(285,066.55)	(309,045.16)	(320,564.92)	(308,640.12)	(285,040.95)	(322,803.47)	(363,957.54)	(3,995,316.11)
Less: Conservation Surcharge (CIP Revenue) (Acct. 1860)	(990,238.56)	(973,060.94)	(877,305.78)	(805,429.57)	(680,896.99)	(685,182.38)	(742,817.08)	(770,505.83)	(741,843.53)	(685,120.84)	(775,886.36)	(874,803.77)	(9,603,091.64)
End of Period Balance	6,829,290.30	6,054,677.10	5,645,676.59	4,869,576.62	4,374,753.73	3,850,191.61	3,140,906.59	2,363,650.95	4,029,382.71	3,649,357.27	3,095,030.57	3,964,661.06	3,964,661.06
Conservation Surcharge	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	

2019 Budget	January	February	March	April	May	June	July	August	September	October	November	December	Total
Beginning of Period Balance (Acct. 1860)	3,964,661.06	2,855,776.92	2,080,436.17	1,671,631.42	896,137.97	403,052.70	(120,510.01)	(828,954.09)	(1,605,180.85)	(2,199.26)	(98,048.31)	(330,339.90)	3,964,661.06
Rate	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	2.55%	
Monthly Carrying Charge Rate	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	0.21250%	
Monthly Carrying Charge	8,424.90	6,068.53	4,420.93	3,552.22	1,904.29	856.49	(256.08)	(1,761.53)	(3,411.01)	(4.67)	(208.35)	(701.97)	18,883.75
CIP Program Charges	274,837.98	587,459.03	818,607.40	351,641.15	457,985.96	435,416.99	333,649.62	306,455.53	754,306.24	580,276.57	535,411.22	2,097,126.30	7,533,174.00
Approved Previous Year Financial Incentive									1,893,013.00				1,893,013.00
Less: CIP Recovery thru Base Rates (Acct. 5119)	(409,023.43)	(402,183.97)	(361,921.97)	(332,204.43)	(279,991.49)	(282,007.21)	(306,099.85)	(317,582.78)	(305,832.20)	(281,822.38)	(319,908.90)	(361,030.60)	(3,959,609.21)
Less: Conservation Surcharge (CIP Revenue) (Acct. 1860)	(983,123.59)	(966,684.34)	(869,911.11)	(798,482.39)	(672,984.04)	(677,828.98)	(735,737.77)	(763,337.98)	(735,094.44)	(394,298.58)	(447,585.55)	(505,119.05)	(8,550,187.82)
End of Period Balance	2,855,776.92	2,080,436.17	1,671,631.42	896,137.97	403,052.70	(120,510.01)	(828,954.09)	(1,605,180.85)	(2,199.26)	(98,048.31)	(330,339.90)	899,934.78	899,934.78
Conservation Surcharge	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00536	0.00312	0.00312	0.00312	

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's 2016 Conservation Cost Recovery Adjustment and 2016 Electric Demand Side Management Financial Incentive Docket No. E017/M-17-246

I, Jana 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 list by electronic service or by First Class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **16th** day of **June, 2017**

/s/ JANA HRDLICKA

Jana Hrdlicka
Regulatory Filing Coordinator
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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