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May 8, 2014



Dr. Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of Utility Renewable Energy Cost Impact Reports Required by Minnesota Statutes Section 216B.1691, Subd.2e.  
Docket No. E999/CI-11-852  
Comments on Cost Impact Reports**

Dear Dr. Haar:

Otter Tail Power Company ("Otter Tail") hereby submits its Comments on Cost Impact Reports to the Minnesota Public Utilities Commission ("Commission") on Utility Energy Cost Impact Reports in the above docket.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the attached service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8417 or at [bhdraxten@otpc.com](mailto:bhdraxten@otpc.com).

Sincerely,

*/S/ BRIAN DRAXTEN*  
Brian Draxten  
Manager, Resource Planning

wao  
Enclosures  
By electronic filing  
c: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of Utility Renewable Energy  
Cost Impact Reports Required by Minnesota  
Statutes Section 216B.1691, Subd.2e.

Docket No. E999/CI-11-852

**OTTER TAIL POWER COMPANY'S  
COMMENTS ON COST IMPACT  
REPORTS**

**I. INTRODUCTION**

Otter Tail Power Company (Otter Tail) respectfully submits the following Comments in the above-captioned matter.

Otter Tail assumes this template is used for informational purposes and not for making Integrated Resource Plan decisions. Otter Tail prefers template 2 proposed by the Department of Commerce-Division of Energy Resources (DOC-DER). Otter Tail believes the proposed template is consistent with the four guiding principles used in this process. Those principles being:

- A. *Foster transparency*, by using publicly available (or aggregated) information;
- B. *Support consistency, coordination and non-burdensome administration*, by utilizing utilities' integrated resource planning, electric transmission planning, financial statements, FERC filings, tariffs and other already produced reports, documents or models including the biennial compliance reports required under Minn. Stat. §216B.1691, Subd. 3 (a); annual qualifying facilities reports (e.g., Docket 13-09).
- C. *Provide realistic representation of baseline, actual (to date) and future expected costs for achieving and maintaining standard compliance*, by using clearly identified and validly supported inputs, with limitations specifically noted;
- D. *Enable comparison across utilities*, by using similar methodologies with easy to understand illustrations including narrative explanations of estimated rate impact of standard compliance for wholesale and retail rates, as applicable.

## II. SPECIFIC COMMENTS ON PROPOSED TEMPLATE 2

Otter Tail offers the following line-by-line comments on the proposed form.

- A. *Generation associated with RES, GWh – Total expected generation throughout the lifetime of the facilities.*

Otter Tail Response: For PPA facilities, the lifetime GWh calculation is straightforward, since the term of the PPA is clearly defined. For utility-owned facilities, the lifetime of the facility needs to be clarified. Otter Tail would suggest that the most recently approved depreciation filing be used as the basis to determine the “lifetime” of the facility.

- B. *Expenses associated with RES facilities, \$millions – source: the sum of all future payments under PPAs and all future revenue requirements associated with utility owned renewable energy projects.*

Otter Tail Response: Otter Tail agrees with the costs mentioned, but would add one more category: costs associated with purchasing Renewable Energy Certificates (RECs).

- C. *Total per-kwh cost for renewable facilities, \$/kwh = B/A – average costs expressed in \$/kwh*

Otter Tail Response: Otter Tail agrees.

- D. *Expenses associated with gas-fired generation source (CT or CC), \$millions – Source the Energy Information Administration’s most recent estimate of levelized, per-kWh costs of either a gas-fired combustion turbine (CT) or a gas-fired combined cycle (CC) unit that would be produce generation equivalent to row A.*

Otter Tail Response: If the Energy Information Administration’s (EIA) estimates are to be used for comparison purposes, then Otter Tail recommends that rows D and E be removed. Only row F is necessary. For consistency between utilities, Otter Tail recommends the average total system levelized cost of electricity (LCOE) for natural gas-fired conventional combined cycle units (as published by EIA in its most recent LCOE report) be used in this comparison. The April 2014 EIA paper titled “Levelized Cost and Levelized Avoided Cost of New Generation Resources in the Annual Energy Outlook 2014” states in Table 1 that the average total system levelized cost of electricity for natural gas-fired conventional combined cycle units is estimated at \$66.3/MWh (in 2012 \$).

- E. *Additional note (no cost estimate needed) – If the utility is aware that any addition of these types of resources would require further costs (such as the addition of a natural gas pipeline), the utility should note that fact.*

Otter Tail Response: Row not needed. See D above.

- F. *Total per-kwh cost for gas-fired generation source, \$kWh=D/A.*

Otter Tail Response: As mentioned in D above, Otter Tail recommends the average total system levelized cost of electricity for natural gas-fired conventional combined cycle units (as published by EIA in its most recent LCOE report) be used in this comparison. The April 2014 EIA paper titled “Levelized Cost and Levelized Avoided Cost of New Generation Resources in the Annual Energy Outlook 2014” states in Table 1 that the average total system levelized cost of electricity for natural gas-fired conventional combined cycle units is estimated at \$66.3/MWh (in 2012 \$).

- G. *Net rate impact of RES, \$/kWh = C-F*

Otter Tail Response: Otter Tail agrees

Thank you for the opportunity to comment on the issue of renewable energy cost impact reporting.

Dated: May 8, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ BRIAN DRAXTEN  
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## CERTIFICATE OF SERVICE

**RE: In the Matter of Utility Renewable Energy Cost Impact Reports Required by  
Minnesota Statutes Section 216B.1691, Subd.2e.  
Docket No. E999/CI-11-852**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar 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  
Comments on Cost Impact Reports**

Dated this **8th** day of **May 2014**.

/s/ WENDIA. OLSON

Wendi A. Olson  
Regulatory Filing Coordinator  
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