

November 6, 2025

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

RE: Supplemental Comments of the Minnesota Department of Commerce
Docket No. E017/M-25-30

Dear Ms. Bergman:

Attached are the supplemental comments of the Minnesota Department of Commerce (Department) in the following matter:

*OTTER TAIL POWER COMPANY'S 2024 ANNUAL SAFETY, RELIABILITY AND SERVICE
QUALITY REPORT AND PROPOSED SAIFI, SAIDI, AND CAIDI RELIABILITY
STANDARDS FOR 2025.*

The Petition was filed by Otter Tail Power Company (Otter Tail, OTP or the Company) on April 1, 2025. The Company filed Reply Comments on July 25, 2025, first Supplemental Comments on June 10, 2025, and second Supplemental Comments on November 3, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission):

- Set the 2025 statewide and work center reliability standards at the Institute of Electrical and Electronic Engineers (IEEE) benchmarking 2nd quartile for medium utilities.
- Set the benchmark for OTP's 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP's statewide system against IEEE's medium-sized utilities' data and OTP's work centers against IEEE's small-sized utilities data.

The Department will provide a final recommendation to the Commission on OTP's Annual Service Reliability Report after reviewing the Company's future Supplemental Filing on the work-center level IEEE 2024 Benchmarking data once IEEE provides that information by utility size.

The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ Dr. SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

LB/JK/ar
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-30

I. INTRODUCTION

On April 1, 2025, Otter Tail Power Company (Otter Tail, OTP, or the Company) filed its 2024 Annual Safety, Reliability, and Service Quality Standards Report (2024 SRSQ Report or Annual Report) in Docket No. E017/M-25-30, in accordance with the Public Utilities Commission (Commission) orders and the requirements of Minnesota Rules Chapter 7826, along with its proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024.

On June 10, 2025, OTP filed supplemental comments addressing the additional compliance requirements in the Commission's January 28, 2020, Order in Docket No. E017/M-19-260.

The Department filed its initial comments on July 11, 2025, which included preliminary recommendations and a request for OTP to provide additional information in a supplemental filing.

On July 25, 2025, OTP filed reply comments and on November 3, 2025, OTP filed second Supplemental Comments.

II. PROCEDURAL BACKGROUND

April 1, 2025	Otter Tail filed a petition for approval of the 2024 SRSQ Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2025.
April 30, 2025	The Commission issued a notice of comment period for the Report.
June 10, 2025	Otter Tail filed supplemental comments.
July 11, 2025	The Department filed initial comments.
July 18, 2025	The Commission filed an Ex Parte Communication.
July 25, 2025	Otter Tail filed reply comments.
November 3, 2025	Otter Tail filed second set of supplemental comments.

III. DEPARTMENT ANALYSIS

Under the Commission's current process, the reliability benchmarking information for Otter Tail for 2025 is derived from IEEE's second quartile 2024 results.

- A. *UPDATE ON 2025 IEEE RELIABILITY RESULTS IEEE'S DISTRIBUTION RELIABILITY WORKING GROUP (DRWG) PRESENTED ITS INITIAL RESULTS FOR BENCHMARK YEAR 2025 RESULTS FOR 2024 DATA ON AUGUST 15, 2025.*¹

Unfortunately, IEEE only published summary information for all the electric utilities reporting reliability information in 2024. The 2024 reliability benchmarking results at this level are not detailed enough to satisfy Order Points 4 and 5 of the Commission's Order in OTP's 2023 SRSQ, which require the identification of specific reliability standards:

4. OTP's 2024 statewide reliability Standard is set at the IEEE benchmarking second Quartile for medium utilities. Otter Tails's work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities.

5. Otter Tail Power must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2023 benchmarking results, with an explanation for any standards the utility did not meet.²

Hence, the Commission's Order requires that the 2024 IEEE Reliability Benchmarks be calculated by utility size. To the Department's knowledge, IEEE has not yet published this information. Until IEEE's DRWG staff provide this information, OTP cannot complete its reliability-related supplemental filing. Nor can the Department review OTP's reliability-related supplemental filing.

Department staff have asked IEEE staff involved with this effort to provide this information. It is also the Department's understanding that OTP has made the same request to IEEE staff as well. Thus, the Department cannot forward its final recommendation regarding OTP's 2024 Reliability Report until it has received and reviewed that information. The Department notes it will provide its analysis and recommendation as quickly as possible after receiving said information.

The Department notes OTP filed supplemental comments on November 3, 2025. Those supplemental comments included a comparison of the 2024 IEEE reliability summary benchmarking results for all utilities to OTP's 2024 reliability results.³ The Department appreciates Otter Tail's effort, but the exclusion of utility size is contrary to the original intentions of the compliance orders. Hence, the Department cannot conclude or recommend that OTP has complied with that reporting requirement.

¹ See [IEEE DRWG 2024 Results](#).

² See *In the Matter of OTP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Commission Order, January 13, 2025, Docket No. E017/M-24-30 (eDockets: [20251-213880-01](#)) at 11.

³ See *In the Matter of OTP's 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2025*, Docket No. E017/M-25-30 (eDockets: [202511-224612-01](#)) at 2.

B. PROPOSED 2025 BENCHMARK: IEEE FIVE-YEAR AVERAGE WITH ONE-YEAR LAG

As discussed in the Department’s initial comments, the Department recommended benchmarking OTP’s 2025 performance against the five-year average of IEEE results from 2020–2024, using medium-sized utility data for the statewide system and small-sized utility data for work centers, with a one-year lag. Accordingly, OTP’s 2025 performance would be measured against IEEE’s 2021–2025 results, reflecting 2020–2024 data.⁴

The Department also continues to recommend that if IEEE does not report utility-sized response results in the future, the IEEE overall results for that year be used instead of the (unavailable) utility-sized results for the five-year average benchmark calculation.⁵

C. LIMITATIONS OF IEEE DATA – MAIFI PERFORMANCE BY CUSTOMER CLASS

The Commission’s January 28, 2020, Order in Docket No. E017/M-19-260 included Attachment B: Updated Annual Reporting Requirements.⁶ Attachment B’s item 11 requires reporting on performance by customer class for ASAI, SAIDI, SAIFI, CAIDI, and MAIFI⁷. OTP stated in the Petition that it would provide this information in its filing reporting IEEE’s 2024 Reliability Information.⁸

The Department will review that information and provide a recommendation to the Commission as quickly as it can once Otter Tail provides the IEEE information.

IV. DEPARTMENT RECOMMENDATIONS

- Defers making a recommendation on OTP’s 2025 statewide and work center reliability standards until it has had the opportunity to review the IEEE benchmarking results by utility size.
- Recommends setting the benchmarking of OTP’s 2025 performance to the five-year average of the IEEE benchmarks (2020-2024 performance year data) for OTP’s statewide system against IEEE’s medium-sized utilities’ data and OTP’s work centers against IEEE’s small-sized utilities data if the Commission prefers to modify the current process for setting OTP’s annual reliability goals.
- Defers forwarding a recommendation regarding OTP’s MAIFI reliability by customer class. The Department will provide a recommendation once Otter Tail provides the information as part of its IEEE benchmarking results compliance filing and the Department has had the opportunity to review it.

⁴ This would allow OTP to include a comparison of its prior year reliability results without having to wait for information from IEEE. This change would also accelerate the approval process.

⁵ See *In the Matter of OTP’s 2023 Annual SRSQ Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2024*, Department, Supplemental Comments, October 15, 2024, Docket No. E017/M-24-30 (eDockets: [202410-210977-01](#)) at 1.

⁶ In the Matter of Otter Tail Power’s 2018 Annual Safety, Reliability, and Service Quality Report, PUC Order, January 28, 2020, Docket No. E017/M-19-260 (eDockets: [20014-151593-01](#)) ([2020 OTP SRSQ Order](#)).

⁷ Id.

⁸ Petition at 44.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Supplemental Comments**

Docket No. E017/M-25-30

Dated this 6th day of **November 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		No	Official 25-30
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
3	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Official 25-30
4	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	Official 25-30
5	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Official 25-30
6	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-30
8	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 25-30
9	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-30
10	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
11	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-30
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-30
13	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Wendi	Olson	wolson@otpc.com	Otter Tail Power Company		215 South Cascade Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
15	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
16	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	Official 25-30
17	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30
18	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-30