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June 10, 2020

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

**RE: In the Matter of an Inquiry into the Financial Effects of COVID-19 on Natural Gas and Electric Utilities
Docket No. E, G999/M-20-427
Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) in response to the Minnesota Public Utilities Commission's Notice of Comment Period issued May 20, 2020 in Docket No. E, G999/M-20-427 files the attached Comments.

Otter Tail has also joined the other rate-regulated Minnesota utilities in their separate filing of the Joint Petitioners' Comments in response to the Minnesota Public Utilities Commission's Notice of Comment Period issued May 20, 2020 in Docket No. E, G999/M-20-427.

Otter Tail has electronically filed this document with the Commission. Please contact me at (218) 739-8607, or pbeithon@otpc.com, should you have any questions.

Sincerely,

/s/ PETE BEITHON
Manager, Regulatory Recovery

cjh
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben	Chair
Valerie Means	Commissioner
Matthew Schuerger	Commissioner
Joseph K. Sullivan	Commissioner
John A. Tuma	Commissioner

In the Matter of the Request of Minnesota
Regulated Gas and Electric Utilities for
Authorization to Track Expenses Resulting
From the Effects of COVID-19 and
Record and Defer Such Expenses Into a
Regulatory Asset

Docket No. E, G-999/M-20-427

OTTER TAIL POWER'S COMMENTS

Introduction

Otter Tail Power (Otter Tail) files these initial comments in concert with the Joint Petitioners' Comments being filed in this matter.

The Joint Petitioners¹ have filed comments in response to the Minnesota Public Utilities Commission's ("Commission") May 20, 2020 Notice of Comment Period ("Notice") in the above-captioned matter. Otter Tail appreciates the Commission's approach to the ongoing COVID-19 pandemic and its quick action granting the request for deferred accounting in the May 22, 2020 Order Approving Accounting Request and Taking Other Action Related to COVID-19 Pandemic ("Order"). The Order recognized the

¹ The Joint Petitioners consist of the rate-regulated electric and natural gas service providers in Minnesota, alphabetically: CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas, Dakota Electric Association, Great Plains Natural Gas Co., Greater Minnesota Gas, Inc., Minnesota Energy Resources Corporation, Minnesota Power, Northern States Power Company d/b/a Xcel Energy and Otter Tail Power.

actions Petitioners may need to take in response to the COVID-19 pandemic can “result in expenditures and other financial impacts outside of the utility’s control,” and as such allows deferred accounting.

Otter Tail supports the general categories of financial impacts described in the filing of the Joint Petitioners as potential items to be included in eventual requests for recovery. Otter Tail notes that there may also be financial impacts which are not foreseeable at this point in time and that any other such items would be subject to the same criteria for recovery. The Order noted that the magnitude of these expenditures and financial impacts cannot be known at this stage of the pandemic and that the Commission will review any deferred costs and financial impacts at a later date to determine the significance, prudence, reasonableness and incremental nature of these costs.²

Comments

As noted, Otter Tail supports the general categories of financial impacts included in the filing of Joint Petitioners. Because the pandemic and responses to it are still evolving, we are not yet in a position to estimate impacts to many of the areas identified, but the following are some general responses and observations of what we are experiencing.

It appears uncollectible account impacts may be significant based on early experience working with customers who are in arrears. Otter Tail has been reporting on the status of total customers in arrears and the amounts in Docket No. E,G999/CI-20-375. In many cases, it has been challenging to motivate customers to pay when repercussions,

² *Id.*

such as late fees and disconnections, have been removed. Otter Tail has also experienced that some customers, when requested, have been less willing to enter payment arrangements to remain or return to current on their outstanding bills. As amounts in arrears grow over time, many account balances may become too large for some customers to manage. These occurrences have increased both our expected uncollectible accounts and cash working capital requirements, due to longer periods over which accounts are in arrears.

Next, significant amounts are being spent for PPE and other costs related to safe working practices and we are altering work practices to meet recommended social distancing, cleaning and other safe work practices. There are several examples, such as the implementation of a practice of having field personnel avoid travel with more than one person in service trucks and other vehicles, cleaning of tools, workstations, vehicles. These practices have increased the costs for these crews to respond to system issues and complete their other work. It is necessary however, to allow them to maintain distance from coworkers. Otter Tail expects impacts in each of the four major categories listed in Attachment A of the Joint Petitioners' June 10, 2020 Comments in this docket. Uncollectible accounts expense is anticipated to be significant based on our reporting in Docket No. E,G999/CI-20-375. Clearly there are/will be other operating expense impacts (O&M, Labor, etc.) such as sequestration expenses as detailed in Attachment A. Also, Otter Tail expects revenue impacts as described in Attachment A to the Joint Petitioners' Comments. Otter Tail has been significantly impacted by the lowered demand for oil since

a major customer is a pipeline (30%+ of Otter Tail's Minnesota energy usage). There will also likely be other costs that aren't anticipated at this time.

Otter Tail believes the general approach, framework and tracking or other documentation of the specific items listed in Attachment A to the Joint Petitioners' Comments plus any items that arise in the coming months which are not anticipated can be the basis for any later regulatory review by the Commission.

Regarding subsequent reporting, Otter Tail believes initial estimates could start to be provided following the close of the third quarter of 2020.

Otter Tail appreciates the opportunity allowed by the Commission to submit these comments.

By: /s/ *PETE BEITHON*
Pete Beithon
Manager, Regulatory Recovery
Otter Tail Power Company

June 10, 2020

CERTIFICATE OF SERVICE

**RE: In the Matter of an Inquiry into the Financial Effects of COVID-19 on
Natural Gas and Electric Utilities
Docket No. E,G999/M-20-427
Comments**

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

Dated this 10th day of June, 2020

/s/ CARLY HAIBY

Carly Haiby, Regulatory Filings Coordinator
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