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October 17, 2016



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

**RE: In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities
Docket No. E999/CI-15-755
Supplemental Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits its Supplemental Comments to the Minnesota Public Utilities Commission (Commission) in the above referenced matter.

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

If you have any questions regarding this filing, please contact me at 218-739-8956 or at cstephenson@otpc.com.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

jch
Enclosures
By electronic filing
c: Service List

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

In the Matter of a Commission
Inquiry into Fees Charged on
Qualifying Facilities

Docket No. E999/CI-15-755

**OTTER TAIL POWER
COMPANY'S SUPPLEMENTAL
COMMENTS**

Otter Tail Power Company (Otter Tail or the Company) appreciates the opportunity to submit supplemental comments in accord with the scope of Commission's June 22, 2015 Notice of Comment Period for supplemental comments.

The 2015 Amendments to Minn. Stat. §216B.164, Subd. 3(a)

Otter Tail agrees with the Reply Comments of utilities stating that the 2015 amendment to Minn. Stat. § 216B.164, Subd. 3(a) has no bearing on the ability of public utilities to charge and collect interconnection costs under Subdivision 8 of the statute. The 2015 amendments specifically authorized electric cooperatives and municipal utilities (but not investor-owned utilities) the ability to assess qualifying facilities (QF) "an additional fee to recover the fixed costs not already paid for by the customer through the customer's existing billing arrangement." The additional authorized by the 2015 amendment is distinct from reasonable interconnection costs all utilities are authorized to collect under Minn. Stat. § 216B.164 Subd. 8(b) and Minnesota Rule 7835.0100 Subp. 12.

Otter Tail's Customer Charges

Otter Tail agrees with and supports the Reply Comments of Xcel, Minnesota Power and the Minnesota Rural Electric Association that utilities are authorized by the Public Utility Regulatory Policies Act of 1978 (PURPA) and Minn. Stat. § 216B.164 Subd. 8(b) to collect the incremental costs of serving QF customers. Similar to other utilities, Otter Tail's customer charges are directly related to provision of equipment and services necessary to permit

interconnected operations with a qualifying facility.¹ OTP's QF customer charges recover cost only the incremental cost associated with the provision of non-standard equipment and services required by QF customers, including (1) non-standard metering equipment, (2) per meter O&M expenses; and (3) directly related administrative costs. Moreover Otter Tail's QF customer charges recover only a portion of these incremental costs.

Otter Tail's initial QF customer charges were established in Dockets E-120/M-83-388 and E-017/CG-84-384. The QF customer charges remained unchanged for 26 years. The Commission approved modest increases to the charges in Otter Tail's last completed general rate case in 2010.² The charges have not changed since then. Environmental and solar commentators have suggested that little weight be given to the fact that Otter Tail's customer charges were approved in a general rate case because neither the Commission nor the Administrative Law Judge (ALJ) appear to have specifically commented on the charges. This argument unreasonably assumes that customer charges not specifically addressed in writing by an ALJ or the Commission during a rate case is subject to collateral challenge years later as not having been approved. It is more likely that the lack of written comment or controversy was due to the fact that the ALJ, intervening parties, and Commission concluded the charges were authorized by law and reasonable. Moreover the approach advocated by the non-utility commentators would undermine the Commission's traditional view that rate case proceedings are the gold standard for determining reasonableness of rates.

Upfront Payment vs. Monthly Charge

Otter Tail agrees with utility Reply Comments that Minn. Stat. § 216B.164 Subd. 8(b) and Minnesota Rules § 7835.0100 Subp. 12 do not require utilities to collect all interconnection costs in a one-time upfront fee. The statute and rule do not prescribe a method of collection of interconnection costs. As noted by Xcel in its Reply Comments QF metering fees were first established as monthly fees to reduce up-front costs incurred by QFs. Monthly fees also take

¹ Otter Tail's customer charges for QF customers are found in its Small Power Producer Riders: Section 12.01 Small Power Producer Rider (Net Energy Billing Rate), Section 12.02 Small Power Producer Rider (Simultaneous Purchase & Sale Billing Rate) and Section 12.03 Small Power Producer Rider (Time-of-Day Purchase Rates).

² *In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E017/GR-10-239

into account the operating life and replacement of QF metering equipment.³ There are sound reasons previously recognized by the Commission to collect certain interconnection costs through monthly charges rather than in a one-time upfront fee.

Discovery Requests

Some reply comments suggest that the record is inadequate to support recovery of incremental metering costs because utilities have not responded adequately to discovery requests from environmental and solar commentators.⁴ Otter Tail respectfully disagrees. The environmental and solar commentators have not identified a statute or administrative rule authorizing discovery by a non-party in Commission-initiated investigation. There appears to be little precedent for non-party discovery in Commission-initiated investigation dockets.⁵ Otter Tail's concern is that information requests by non-parties in a Commission-initiated investigation can conflict with or alter the scope of the investigation set by the Commission. Also it is not unreasonable to expect overlapping and burdensome requests if commentators to a Commission proceeding can demand discovery without formal intervention or explicit Commission approval. It should be noted that utilities have responded promptly and fully to Commission staff's information request. Otter Tail welcomes the Commission's guidance on this issue.

Refunds

Otter Tail agrees with Xcel's reply comment that refunds of customer charges are not appropriate.⁶ As noted by Xcel, refunds are authorized under Minn. Stat. § 216B.23 when all of the following conditions are present:

1. A public utility has charged a rate in violation of this chapter, a commission rule, or a commission order;

³ Monthly charges also allow QF customers to avoid the situation where it may give up the benefit of a one-time fee in instances when the QF ceases operations earlier than expected. Likewise it enables utilities to avoid expense and effort of administering a refund in these situations.

⁴ *Reply Comments of Fresh Energy, Environmental Law & Policy Center and Vote Solar*, June 16, 2016 at p.3.

⁵ Otter Tail reviewed the e-filed dockets maintained by the Department of Commerce was unable to identify any prior matter where commentators to a Commission-initiated investigation sought and filed information requests.

⁶ The solar interest filing reply comments did not explicitly call for refunds in their reply comments. However ECFA called for refunds in its initial comments and Otter Tail believes that position is implicit in ECFA's reply comments.

2. Revenues were collected as a result of unlawful conduct; and
3. The Commission issues a notice for a proceeding to address the refund issue, and makes a determination in that proceeding showing a refund is appropriate up to six years.

The proponents of a refund have failed to identify any legal or factual basis supporting a refund. There has been no violation of law or Commission rule or order. There is has been no unlawful conduct. Minn. Stat. § 216B.164 Subd. 8(b) and the Commission's March 7, 1983 Order in Docket No. E999/R-80-560 make clear that the QFs are responsible all interconnection costs, including incremental metering costs arising from interconnected activity. Utilities have collected these costs through various Commission orders and Commission-approved procedures. In Otter Tail's case its current QF customer charges have been approved in a general rate. Commentators claiming illegality rely on a truncated reading of the "shall be billed" language of Minn. Stat. § 216B.164 Subdivision 3 that ignores Subdivision 8. There is no basis for the Commission to issue a notice for proceeding to address refunds.

Prospective Changes

Otter Tail agrees with utility reply comments acknowledging that much has changed concerning qualifying facilities and distributed generation over the last 30 years. These changes may be relevant to the policy balance the Commission is required to maintain under Minn. Stat. § 216B.164 between promotion of distributed generation and the protecting the interest of all rate payers. Otter Tail stands ready to engage in policy discussion of this nature and to provide the Commission with additional information.

Dated: October 17, 2016

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON

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CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Inquiry into Fees Charged on Qualifying Facilities
Docket No. E999/CI-15-755**

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
Supplemental Comments**

Dated this **17th** day of **October, 2016**

/s/ JANA HRDLICKA

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Mark	Rathbun	mrathbun@greenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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Kenric	Scheevel	kjs@dairynet.com	Dairyland Power Cooperative	3200 East Avenue South PO Box 817 La Crosse, Wisconsin 54602	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-755_Official Service List _PUC
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Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_15-755_Official Service List _PUC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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