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August 12, 2024



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

**RE: In the Matter of Interconnection Ombudsperson Surcharge
Docket No. E017/CI-24-248
Comments**

Dear Mr. Seuffert:

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

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8227 or canderson@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ CODY ANDERSON
Cody Anderson
Transmission & Distribution Studies Engineer,
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lcd
Enclosures
By electronic filing
c: Service List

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

**In the Matter of Interconnection
Ombudsperson Surcharge**

Docket No. E999/CI-24-248

COMMENTS

I. INTRODUCTION

Otter Tail Power Company (Otter Tail) provides the following comments pursuant to the Minnesota Public Utilities Commission’s (MPUC or Commission) Notice of Comment Period issued August 2, 2024 in the above referenced docket. Specifically, the Commission’s Notice listed the following topics available for comment:

Topic(s) Open for Comment:

- A. Utility comment should include tariff language on the ombudsperson fee and a narrative explanation of how the utility is collecting, tracking, and remitting fees to the Commission consistent with the legislation.
- B. What process should the Commission establish to report and track surcharges collected by public utilities and remitted to the Commission, and adjust the surcharge as needed?
- C. Should the Commission establish an annual cadence to review the ombudsperson surcharge and adjust the surcharge as needed?
- D. Are there other issues or concerns related to this matter?

II. OTTER TAIL RESPONSES

- A. Utility comment should include tariff language on the ombudsperson fee and a narrative explanation of how the utility is collecting, tracking, and remitting fees to the Commission consistent with the legislation.**

Otter Tail has added language to our Minnesota Interconnections webpage¹ outlining and explaining the additional Ombudsperson Fee and this is being collected along with the initial Application Fee payments either through mail by check or through our online Paymentus payment portal.

¹ <https://www.otpc.com/help-center/how-to-connect-to-our-power-grid/minnesota-interconnection/>

Otter Tail maintains an internal DER Tracking Spreadsheet and a new column has been added specifically to track the Minnesota Distributed Energy Resources (DER) Interconnection requests associated with the \$50 Ombudsperson Fee as well as which month they are to be remitted to the MPUC.

On the first of the month, Otter Tail personnel review the number of Minnesota Interconnection requests that were deemed complete in that month, prepare a check requisition request to Otter Tail's Accounts Payables department to send for the appropriate amount to the MPUC, which the Accounts Payables department does by the 15th day of the following month.

Otter Tail offers the following Minnesota Small Power Producer tariffs: Sections 12.01, 12.02, and 12.03 and our Distributed General Service Rider Section 12.04. These tariffs reference the Commission's standard Interconnection Application. We currently do not discuss Interconnection Application fees within our tariffs. These fees are published and described in detail within the Commission's Minnesota Distributed Energy Resources Interconnection Process at section 1.5.1 Interconnection Application.² We believe that the Ombudsperson Fee should be included with these fees in the Interconnection Application and not in our tariff. This will avoid misalignment with the state application requirements and it will allow the Commission to adjust this fee as warranted.

B. What process should the Commission establish to report and track surcharges collected by public utilities and remitted to the Commission, and adjust the surcharge as needed?

The Commission should provide annual summaries of fees collected by the state per utility. In addition, it likely would be helpful to have view of the Ombudsperson's expenses to provide insight on the collection of fees vs. the expenses. Depending on the results of the comparison, the fee amount could be adjusted accordingly.

C. Should the Commission establish an annual cadence to review the ombudsperson surcharge and adjust the surcharge as needed?

Otter Tail is comfortable with an annual cadence to review this, but would request that the Commission try to limit the number of fee adjustments from year to year in order to limit the process updates each utility would be required to

² Available on Otter Tail's website at [dip.pdf \(otpc.com\)](http://dip.pdf.otpc.com).

undertake with each adjustment of the fee amount, particularly if included in tariffs.

D. Are there other issues or concerns related to this matter?

The Ombudsperson Fee should be added to the MN Interconnection Application document so it limits any confusion from the Interconnection Customer on the fee that is required for their application.

III. CONCLUSION

Otter Tail appreciates this opportunity to provide comments on this process and welcomes any further discussion to minimize the administrative efforts to complete such interconnection requests.

Dated: August 12, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ CODY ANDERSON

Cody Anderson

Transmission & Distribution Studies Engineer,
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CERTIFICATE OF SERVICE

**RE: In the Matter of Interconnection Ombudsperson Surcharge
Docket No. E017/CI-24-248**

I, Laura Dewey, 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
Comments**

Dated this **12th** day of **August, 2024**.

/s/ LAURA DEWEY
Laura Dewey
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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