

June 3, 2018

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

RE: **Reply Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-18-119

Dear Mr. Wolf:

Attached are the Response Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) to Otter Tail Power Company's Reply Comments in the following matter:

A Request by Otter Tail Power Company (OTP) of the Company's Annual Filing of the Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider (Petition).

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve** OTP's Petition with adjustments. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DANIELLE WINNER
Rates Analyst

DW/ja
Attachment



Before the Minnesota Public Utilities Commission

Reply Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-18-119

I. BACKGROUND

On March 30, 2018, Otter Tail Power Company (Otter Tail, OTP or the Company) submitted its annual Conservation Improvement Program (CIP) filing (Petition) for 2017 with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/M-18-119. The Petition contained a request for the Commission to permit the Company to carry forward net benefits from 2017 to 2018, for purposes of calculating the financial incentive.

The Department submitted Comments on May 30, 2018 (Department's May 30th Comments), recommending that the Commission:

1. approve Otter Tail's 2017 CIP tracker account, as summarized in Table 1 on page 9 of the Department's May 30, 2018 Comments, resulting in a December 31, 2017 tracker balance of \$7,362,345;
2. approve a Shared Savings financial incentive of \$2,642,360 for Otter Tail's 2017 CIP achievements;
3. approve a Conservation Cost Recovery Adjustment (CCRA) of \$0.00600 per kWh, to be effective October 1, 2018;
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's *Order* in the present docket; and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the *Order* in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

In response to the Company's proposal carry forward net benefits, the Department concluded that the Commission should first determine whether it has the authority to do so. If the Commission finds that it has authority over OTP's request to carry forward net benefits, the

Commission should deny the Company's request. The Department argued that OTP's proposal would undermine the Commission-approved 2017 Shared Savings financial incentive cap (40% of CIP spending) and has the potential to raise certain policy questions about how this type of carry-forward would impact investment in conservation if carry-forward requests were to be pursued year after year.

Otter Tail submitted Reply Comments on June 13th, 2018 (June 13th Reply Comments) modifying its proposal. Rather than requesting that the Commission approve the carry-forward of net benefits from 2017 to 2018, the Company instead requested that the Commission approve the Company's 2017 budgeted expenditures of \$775,483 for its Company-Owned Street and Area LED Lighting Program (LED Program),¹ rather than the Company's actual 2017 LED Program expenditures of \$0, for purposes of calculating the financial incentive. In other words, the 40%-of-CIP-expenditures cap limiting the financial incentive would be calculated based on actual CIP expenditures plus the budgeted, but not yet incurred, costs for the LED Program. Otter Tail appeared only to propose including the budgeted spend for purposes of calculating the financial incentive, and not to recover the budgeted expenses until expenditures are actually incurred.

In its June 13th Reply Comments, the Company noted the following:

- That the Company intended to spend the full budget in 2017, but was unable to because of regulatory delays associated with Docket E017/M-17-152 (LED filing);
- That the Company's financial incentive was significantly impacted as a result of these delays;
- That the Company achieved a record percentage of savings in 2017 and should be adequately compensated for these achievements;
- That the Company believes the Commission has authority to grant this request; and
- That the request meets the statutory criteria for Commission decisions regarding the financial incentive.

In these Response Comments, the Department responds to each of these points.

¹ See Docket No. E017/M-17-152.

II. DEPARTMENT RESPONSE TO OTTER TAIL'S JUNE 13TH REPLY COMMENTS

A. *THE COMPANY INTENDED TO SPEND THE FULL BUDGET IN 2017, BUT WAS UNABLE TO BECAUSE OF REGULATORY DELAYS ASSOCIATED WITH THE LED FILING*

The Department understands and appreciates the Company's concerns. However, from the Department's perspective, the complexity of the LED filing was such that it warranted extensive review and additional information gathering. Specifically, the Department notes the following:

- The costs associated with the Company's Street and Area Lighting program are recovered through three separate mechanisms: through the Street Lighting rates, through the CIP tracker, and through a future rate case;
- The Company proposed (and was permitted) to apply the revenue requirement of its old lights to the newly installed lights, despite the fact that the marginal cost of the new lights was significantly lower than the revenue requirement of the old lights;
- The Company was eligible to earn a rebate on new LEDs installed, but ineligible to count LED savings and net benefits towards earning the financial incentive;
- Although the Company had depreciated the disposal and removal costs of the old lights, there were cost overruns that had not been adequately captured in the depreciated values, and so the Company proposed (and was permitted to) recover the cost overruns associated with the old lights through the CIP tracker rather than through depreciation rates, as is typical;
- The Company proposed (and was permitted to) earn a rate of return of 7.5056% on the incremental costs associated with the new lights through the CIP tracker, since it will not begin recovery of the capital costs of those facilities until the next rate case.

Further, the Department notes that in its September 28, 2017 Comments in the LED filing, the Company amended its filing to reflect the fact that the program would not be started in 2017, and sought (and was granted) Commission approval to start the program in 2018.

The Department spent months working with Otter Tail to ensure that the Company could be reasonably compensated for the program without violating ratemaking principles or double-recovering from ratepayers. However, since there were many recovery mechanisms at play with street lighting, this was a complicated task. Due to this fact, and the fact that during the LED proceeding the Company itself proposed to begin the program in 2018 rather than 2017, the Department does not see the unforeseen timeline as a reason to grant the Company's request.

B. THE COMPANY'S FINANCIAL INCENTIVE WAS SIGNIFICANTLY IMPACTED

The Department agrees that Otter Tail's Shared Savings incentive would have been higher had the Company spent more money in 2017. However, the Company can count the spending towards the 2018 expenditure cap; and as the LED Program is expected to incur costs for five years, the associated incentive will simply be shifted to the year(s) in which the costs are incurred.

C. THE COMPANY ACHIEVED A RECORD PERCENTAGE OF SAVINGS IN 2017 AND SHOULD BE ADEQUATELY COMPENSATED FOR THESE ACHIEVEMENTS

The Department commends the Company for its historic energy savings as measured as a percent of retail sales. However, as noted in the Department's May 30th Comments:

Further, the Company achieved its highest percentage of energy savings to date at 3.01 percent. However, the Department notes that this is not due to increased savings (the numerator in the percent savings equation), which actually declined by approximately 5 million kWh from 2016 to 2017. Instead, the reported 3.01 percent savings is largely due to the aforementioned exemption of two large CIP customers, which reduced the weather-normalized 3-year average retail sales figure (the denominator in the percent savings equation).

Therefore, while Otter Tail's 2017 first-year energy savings measured as a percent of retail sales is the Company's highest ever, the Company had higher first-year energy savings as measured as a unit of energy (kWh) in 2016.² The Department is not sympathetic to OTP's argument.

D. THE COMPANY BELIEVES THE COMMISSION HAS AUTHORITY TO GRANT THIS REQUEST

Utilities file annual CIP status updates with the Deputy Commissioner of Commerce; these status updates include actual spending. The Deputy Commissioner reviews these status updates, including the spending, and then approves, modifies or rejects them.

² As seen in Attachment A, Table 1, of the Department's May 30th Comments, Otter Tail achieved energy savings of 57,497,167 kWh in 2016 and has claimed energy savings of 52,497,167 kWh in 2017. The 2017 energy savings has yet to be reviewed by the Department's CIP staff and Deputy Commissioner.

Minnesota Statute § 216B.241, Subd. 2b states: “The commission shall allow a utility to recover expenses resulting from a conservation improvement program required by the department and contributions and assessments to the energy and conservation account, unless the recovery would be inconsistent with a financial incentive proposal approved by the commission.”

The Company’s proposal that the Commission allow budgeted rather than only actual CIP expenditures to be used as a basis for the cap on the financial incentive could be seen as a divergence from the Deputy Commissioner’s approved CIP spending. However, the Company’s request is not for purposes of *recovery* of that spending; instead, the proposal is only for purposes of calculating the expenditures-based financial incentive cap.

Therefore, since the Company’s proposal appears to relate solely to the financial incentive, the Department concludes that the Commission may have authority to grant or deny this request. However, since Minnesota Statutes do not explicitly address this situation specifically, the Department concludes that the Commission first needs to determine whether it has authority to shift a portion of Commerce Commissioner-approved CIP expenses to a different year for purposes of calculating the cap on a utility’s financial incentive.

E. THAT THE COMPANY’S REQUEST MEETS THE STATUTORY CRITERIA FOR COMMISSION DECISIONS REGARDING THE FINANCIAL INCENTIVE

As noted in the Department’s May 30th Comments, Minnesota Statute § 216B.16 subd. 6c outlines the factors the Commission must consider when approving incentive plans. If the Commission determines that it has authority in regards to the Company’s proposal, the Commission could evaluate the merits of the proposal using the factors given in that statute. The Department provides the following analysis based on the criteria contained in Minnesota Statute § 216B.16, subd. 6c.

- (1) whether the plan is likely to increase utility investment in cost-effective energy conservation;

The Company’s proposal does not meet this criteria.

The Department notes that the Company has already begun cost-effective investment in the LED Program. Denying the Company’s proposal would not halt the program, nor would it discourage the Company from achieving the greatest savings possible through the program. Approving Otter Tail’s proposal will not increase investment in cost-effective savings.

- (2) whether the plan is compatible with the interest of utility ratepayers and other interested parties;

The Company's proposal does not meet this criteria because it provides a significantly higher incentive than calculated under approved rules without providing any additional value to ratepayers.

- (3) whether the plan links the incentive to the utility's performance in achieving cost-effective conservation;

This proposal does not meet this criteria. Otter Tail did not save energy from the LED Program in 2017, and so allowing budgeted spending in 2017 to count towards the financial incentive expenditure cap would actually de-link the incentive and the utility's performance.

- (4) whether the plan is in conflict with other provisions of this chapter.

The Company's proposal appears to meet this criteria. The Department is unaware of any conflicts with any other provisions of this chapter.

The Department concludes that Otter Tail's proposal to count the 2017 budgeted expenditures associated with the LED program in the Company's 2017 CIP expenditures for the purposes of calculating its financial incentive cap does not meet the criteria of Minnesota Statute § 216B.16 subd. 6c.

III. ADDITIONAL DEPARTMENT OBSERVATION REGARDING THE COMPANY'S PROPOSAL

The Commission approved the recovery of \$775,483 in Year 1 of Otter Tail's LED Program. In the Company's June 13th Reply Comments, Otter Tail stated that this amount is what the Company proposed to apply towards the expenditure cap. The Department disagrees with this proposal.

The Department notes that the \$775,483 budget for 2017 includes the following:

| Description | Amount (\$) |
|---|-------------|
| CIP Program Evaluation | \$3,000 |
| CIP Rebate | \$178,572 |
| Administrative Costs (non-labor) | \$125,000 |
| Retirement and Disposal Costs | \$432,803 |
| Return on Incremental Costs of New Lights | \$36,108 |
| Total Recovery through CIP Tracker | \$775,483 |

The Department notes that a public utility is eligible for rebates offered by its own CIP program for projects pursued at its own facilities; however, the utility is not permitted to recover a Shared Savings financial incentive for energy savings associated with CIP projects at its own facilities. Therefore, while it is appropriate for the Company to recover the CIP Rebate through the CIP tracker, the Department concludes that it is inappropriate for Otter Tail to count the CIP rebate as a CIP expense when calculating its financial incentive cap.

Similarly, in the course of the LED filing proceeding, the Department and the Commission were sensitive to the fact that while the Company will continue to recover the costs of the old street lighting equipment through the existing LED rates, the incremental costs of the new lights will not be added to rate base until the Company's next rate case. Therefore, the Commission allowed the Company to earn a rate of return on the incremental costs of the new lights through the CIP tracker. While the Department agrees that the Commission's decision appropriately acknowledges the policy goal of encouraging conservation while adhering to ratemaking principles, the rate of return applied to the incremental costs of the new lights is normally recovered through base rates and not the CIP tracker. A rate of return is not considered a CIP expense. Therefore, the rate of return on the incremental costs of the new lights should not be counted when calculating Otter Tail's financial incentive expenditure cap.

Therefore, the Department concludes that the Company should not be permitted to count either the costs of the CIP Rebate or the Rate of Return on the New Lights towards the financial incentive expenditure cap. Should the Commission approve Otter Tail's request to count the budgeted amounts associated with the LED Program in total CIP expenses used to calculate the financial incentive cap, the Department recommends that the budgeted amount allowed be limited to \$560,803.

IV. DEPARTMENT RECOMMENDATIONS

The Department recommends that the Commission:

1. approve Otter Tail's 2017 CIP tracker account, as summarized in Table 1 on page 9 of the Department's May 30, 2018 Comments, resulting in a December 31, 2017 tracker balance of \$7,362,345;
2. approve a Shared Savings financial incentive of \$2,642,360 for Otter Tail's 2017 CIP achievements;
3. approve a CCRA of \$0.00600 per kWh, to be effective October 1, 2018, or the first day of the month following the Commission's Order in this matter;

4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket; and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

In addition, the Department recommends that if the Commission determines that it has the authority to allow OTP to count budgeted, in addition to actual, CIP expenditures when calculating the financial incentive cap, the Commission should deny the Company's proposal to do so. Further, the Department recommends that, in future CIP tracker and financial incentive filings, the Commission direct the Company to remove from the expenditures cap calculation the amounts associated with the CIP rebates received by the Company and any allowed rate of return applied to costs associated with CIP projects involving Company facilities.

/ja

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
Response Comments**

Docket No. E017/M-18-119

Dated this 3rd day of July 2018

/s/Sharon Ferguson

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| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
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| Russ | Stark | Russ.Stark@ci.stpaul.mn.us | City of St. Paul | 390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Cary | Stephenson | cStephenson@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Kodi | Verhalen | kverhalen@briggs.com | Briggs & Morgan | 2200 IDS Center 80 South Eighth Street Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Michael | Volker | mvolker@eastriver.coop | East River Electric Power Coop | 211 S. Harth Ave Madison, SD 57042 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Sharon N. | Walsh | swalsh@shakopeeutilities.com | Shakopee Public Utilities | 255 Sarazin St Shakopee, MN 55379 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Ethan | Warner | ethan.warner@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, Minnesota 55402 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| Robyn | Woeste | robynwoeste@alliantenergy.com | Interstate Power and Light Company | 200 First St SE Cedar Rapids, IA 52401 | Electronic Service | No | OFF_SL_18-119_M-18-119 |
| 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_18-119_M-18-119 |