

215 South Cascade Street  
PO Box 496  
Fergus Falls, Minnesota 56538-0496  
218 739-8200  
[www.otpc.com](http://www.otpc.com) (web site)

November 24, 2025



Ms. Sasha Bergman  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of Otter Tail Power Company 2024 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2025  
Docket No. E017/M-25-30  
IEEE Supplemental Amendment Filing**

Dear Ms. Bergman:

Otter Tail Power Company (Otter Tail Power) submits this IEEE Supplemental Amendment filing in the above-referenced matter in compliance with ordering paragraph 4, 5 and 9 of the Minnesota Public Utilities Commission's Order dated January 13, 2025, in Docket No. E017/M-24-30 (In the matter of Otter Tail Power Company's 2024 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2024 and future standards).

4. *Otter Tail Power's 2024 statewide Reliability Standard is set at the IEEE benchmarking second Quartile for medium utilities. Otter Tail's work center reliability standards are set at the IEEE benchmarking second quartile for medium utilities. Set Otter Tail Power's 2023 statewide Reliability Standard at the IEEE benchmarking 2nd Quartile for medium utilities. Set Otter Tail's work center reliability standards at the IEEE benchmarking 2nd quartile for medium utilities. Required Otter Tail to file a supplement to its 2024 SQSR report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.*
5. *Otter Tail Power's must file a supplement to its 2024 safety, reliability, and service quality report 30 days after IEEE publishes the 2024 benchmarking results, with an explanation for any standards the utility did not meet.*
9. *Minnesota Power and Otter Tail Power must include a discussion on the IEEE reporting sample size and data exclusion challenges from this ye*

The attached IEEE 2025 (for 2024) Benchmark Reliability Survey results were completed August 15, 2025. Note that the 2024 initial IEEE Benchmark Results included all utilities, small, medium and large, thus the previous results shown below in Table 1 included all utilities and no breakdown by size was initially included.

**Table 1** shows Otter Tail Power’s 2024 normalized SAIFI, CAIDI and SAIDI results based on the IEEE 2.5 Beta Method philosophy for the entire Minnesota system and work centers, compared with the IEEE benchmarking second quartile for all responding utilities. Otter Tail’s **2024 results were gathered by our new Outage Management System which captures customer minutes and sustained customer interruptions at the customer level compared to previous (all years) reporting which gathered data at the feeder level.** As expected, we have seen impacts on our metrics with the application at a more granular level.

**Table 1**

	<b>SAIDI IEEE</b>	<b>SAIFI IEEE</b>	<b>CAIDI IEEE</b>
<b>2024 IEEE Benchmark Median for all utilities</b>	137	1.06	124
<b>Bemidji</b>	114.77	1.05	109.75
<b>Crookston</b>	108.2	0.81	133.73
<b>Fergus Falls</b>	220.37	1.57	140.44
<b>Morris</b>	108.74	0.8	135.72
<b>MN Total</b>	141.55	1.16	122.22

Otter Tail Power Co. became aware of IEEE’s updated survey, showing utility size breakdowns on 11/13/25 and shares these results below in Table 2.

The narrative regarding explanations following Table 2 remains largely the same as our previous supplemental filing as well as discussions regarding the IEEE reporting sample size and data exclusion challenges from this year.

Summarizing the update to utility size comparisons, Otter Tail Power met the SAIDI goal for Minnesota total customers which we did not when compared to ALL utilities.

**Table 2**

	<b>SAIDI IEEE</b>	<b>SAIFI IEEE</b>	<b>CAIDI IEEE</b>
<b>2024 IEEE Benchmark Median for Medium Size Utilities</b>	150	1.15	128
<b>Bemidji</b>	114.77	1.05	109.75
<b>Crookston</b>	108.2	0.81	133.73
<b>Fergus Falls</b>	220.37	1.57	140.44
<b>Morris</b>	108.74	0.8	135.72
<b>MN Total</b>	141.55	1.16	122.22

Fergus Falls CSC 2024 SAIDI, SAIFI, and CAIDI results exceeded all IEEE benchmark median results. MN Total System exceeds the SAIFI goal largely due to results within the Fergus Falls CSC. As mentioned previously, we have migrated to a more granular interruption data system for 2024 reporting (OMS implemented in December 2022) and away from our former reporting method (Interruption Monitoring System, IMS) in the 2023 and prior timeframe.

Among the most significant events influencing Fergus Falls CSC reliability metrics in 2024 were several summer storms with widespread impacts, as well as a notable equipment failure:

- A Mid-July Summer Storm (Wind/Trees/Lightning) occurred from July 13 to July 14, 2024. This event resulted in a total of 1,047,374 customer minutes. Affected were 2,881 customers, with an average outage duration of 315 minutes. Nineteen feeders were impacted, with outages concentrated around Ottertail city, Perham, Rush Lake, Parkers Prairie, and Elizabeth/Carlisle.
- Material Failure (Overhead Splice): On December 18, 2024, from 4:00 PM to 6:55 PM, an overhead splice failure led to a complete outage at the Fergus Falls Buse St. Substation. This incident lasted 175 minutes and affected a total of 2,172 customers, adding 380,100 customer minutes to the annual interruption totals.
- Late July Summer Weather (Trees/Wind): On July 31, 2024, wind gusts of 91 MPH caused 218,445 customer minutes impacting 2,219 customers with an average duration was 91 minutes. Eighteen feeders were impacted, most notably the Fergus Falls Buse NW Feeder, which experienced a full outage when a tree fell on the line—affecting 1,337 customers for 70 minutes and accounting for 82,000 customer minutes. Additional feeders impacted included All Freazee (North, South, Rural), Wendell, Elbow Lake, Elizabeth/Carlisle, and Perham.

These events, particularly the July storms and the December equipment failure, contributed substantially to the elevated SAIDI, SAIFI, and CAIDI figures for Fergus Falls CSC and, by extension, the Minnesota Total System SAIFI in 2024.

Regarding the request to include discussions on “*the IEEE reporting sample size and data exclusion challenges from this year,*” Otter Tail Power responds with the following:

According to the US Energy Information Administration (EIA) there are 166 investor-owned utilities in the United States. The IEEE survey sample size of 73 respondents may or may not be statistically significant. EEI’s Reliability Survey, in which OTP participates, has a sample size of 10% more utilities with much more data, i.e. outage cause types by percentage, customer minutes associated, and statistics, etc. Survey accuracy would be dependent on desired confidence level, margin of error, and the variability within the population. Otter Tail Power, a rural focused electrical utility, serves 422 communities with an average population of approximately 400, in a total service territory the size of the state of North Dakota. If the medium sized utility respondent population “type” does not have the customer rural demographic Ottertail has, with much exposure, results could vary greatly.

Otter Tail has electronically filed this document with the Minnesota Public Utilities Commission and on all people on the official service list for the above-referenced docket. A Certificate of Service is also enclosed.

Please contact me at (218) 739-8552 or [rjensen@otpc.com](mailto:rjensen@otpc.com), should you have any questions.

Sincerely,

/s/ *ROD D. JENSEN*  
Rod D. Jensen PE  
Senior Reliability Engineer

amn  
Enclosures  
By electronic filing  
c: Service List

## CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2024 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2025  
Docket No. E017/M-25-30**

I, Anahita Narimani, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman 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  
IEEE Supplemental Amendment Filing**

Dated this **24th** day of **November 2025**.

/s/ ANAHITA NARIMANI  
Anahita Narimani  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8363

#	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