

**STATE OF MINNESOTA
PUBLIC UTILITIES COMMISSION**

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

September 7, 2018

**In the Matter of the Distribution
System Planning for Otter Tail Power**

Docket Number E002/CI-18-253

Comments of Fresh Energy

Fresh Energy submits these initial comments in response to the Commission's July 25, 2018 [Notice of Comment Period](#).

Fresh Energy finds that the Draft IDP Requirements are reasonable, based on a robust record, and are an important step forward in the Commission's investigation into distribution system planning. They would provide valuable insight into Otter Tail Power's distribution system and planning processes, and they represent the first step toward optimizing DERs and realizing customer and system benefits. We support the Commission generally adopting the staff proposed Requirements with the changes adopted for Xcel Energy at the Commission's August 9th, 2018 agenda meeting.

We recognize that there are likely some requirements adopted for Xcel Energy that may not be applicable to Otter Tail at this time. We expect Otter Tail to address these items in initial comments and we plan to respond in reply comments.

/s/ Allen Gleckner

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