

July 19, 2022

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

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-22-165

Dear Mr. Seuffert:

On April 1, 2022, Otter Tail Power Company submitted to the Minnesota Public Utilities Commission (Commission) *A Petition of Otter Tail Power's 2021 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider*.

On May 19, 2022, the Department filed comments stating Otter Tail's filing was generally reasonable and recommended the Commission take the following action:

1. Approve a DSM financial incentive of \$2,900,388 for Otter Tail's 2021 CIP achievements.
2. Approve Otter Tail's 2021 CIP tracker account, as summarized in Table 1 above, resulting in a December 31, 2021, tracker balance of \$2,870,213.
3. Approve a CCRA of \$0.00667 per kWh, to be effective the first month after Commission approval.
4. Grant Otter Tail a variance to Minnesota Rules 7820.3500(K).
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.

On June 1, 2022 Otter Tail filed reply comments agreeing with the Department's recommendations.

On June 10, 2022, Otter Tail filed supplemental reply comments revising several exhibits to incorporate the February 1, 2022 Commission's Order of eliminating the Conservation Cost Recovery Charge (CCRC) and rolling it into the Conservation Cost Recovery Adjustment (CCRA)¹, and modifying the Class Rate

¹ Docket No. E017/GR-20-719, Order Point 68

Apportionment² which aligns customer classes more closely to bearing their appropriate cost burdens. The revised attachments are discussed below:

I. OTTER TAIL'S UPDATED CIP TRACKER, MONTHLY BILL IMPACTS AND RATE DESIGN

A. OTTER TAIL'S UPDATED CIP TRACKER AND PROPOSED CCRA

Otter Tail submitted an updated CIP tracker and *Proposed* CCRA reflecting the Commission's Order to eliminate the CCRC rate and roll it into the CCRA rate beginning July 1, 2022. The updated tracker provides details on the CCRA effective July 1, 2022 (\$0.00805) with the CCRC rolled in, as well as the *Proposed* CCRA rate for October 1, 2022 (\$0.00890). Table 1 below provides the details on both the current and *Proposed* CCRA rates.

Table 1. Otter Tail Current and Proposed CCRA Rates

	CCRC Separate	CCRC Rolled into CCRA	<i>Proposed</i>
	1/1/2022 - 06/30/2022	7/1/2022 - 09/30/2022	10/1/2022 - 09/30/2023
Conservation Cost Recovery Adjustment Rate (CCRA)	0.00582	0.00805	0.00890
Conservation Cost Recovery Charge Rate (CCRC)	0.00223	0.00000	0.00000
Total Conservation Recovery Rate	0.00805	0.00805	0.00890

The Department compared the original to the revised trackers validating all formulas were accurate and data remained consistent to the original *Petition*. The Department's review indicates the Company's updated CIP tracker is accurate and reflects the Commission's Order Point 68 in Docket No. E017/GR-20-719.

B. OTTER TAIL'S RATE CALCULATION BY CLASS COMPARISON

Otter Tail submitted a breakdown of the revenue requirements for the period of October 1, 2022 through September 30, 2022, by class, in Exhibit 3. The Department compared the revenue requirements, projected sales, and CIP allocators identified in the March 8, 2022 Compliance filing in Docket E017/GR-20-719. The Department found all calculations to be accurate and class percentages in agreement with the filing.

C. OTTER TAIL'S MONTHLY BILL IMPACTS

Otter Tail provided Exhibit 2, a Comparison of Monthly Bill Impacts, which identifies the current CCRA rate and CCRC rate along with the *Proposed* CCRA rate (this incorporates the CCRC). The schedule uses the rate calculation, by class, from Exhibit 3. Table 2 shows Otter Tail's updated comparison of monthly bill impacts below.

² Docket No. E017/GR-20-719, Order Point 82

Table 2. Otter Tail Power Company Comparison of Monthly Bill Impacts

Rate Class	Average kWh/Bill	Average \$/Bill before CCRA	Monthly Impacts			
			Current CCRA & CCRC	Proposed CCRA	Monthly Bill \$ Change	Monthly Bill % Change
Residential	760	\$83.97	\$6.12	\$6.69	\$0.57	0.68%
Farm	2,605	\$266.33	\$20.97	\$22.89	\$1.93	0.72%
General Service	2,586	\$266.65	\$20.81	\$23.09	\$2.28	0.85%
Large General Service	133,438	\$6,118.31	\$1,074.18	\$1,196.94	\$122.76	2.01%
Irrigation	1,536	\$129.40	\$12.36	\$8.36	(\$4.01)	-3.10%
Outdoor Lighting	54	\$14.20	\$0.43	\$0.68	\$0.25	1.75%
OPA	3,266	\$282.76	\$26.29	\$24.46	(\$1.83)	-0.65%
Deferred Load and Water Heating Control	314	\$25.79	\$2.53	\$2.95	\$0.42	1.63%
Interruptible Load	131	\$7.97	\$1.06	\$1.21	\$0.15	1.94%
Fixed Time of Delivery	5,469	\$230.01	\$44.02	\$35.44	(\$8.59)	-3.73%

The Department analyzed the updated table and found all data and calculations reasonable.

II. DEPARTMENT RECOMMENDATIONS

The Department concludes Otter Tail's updated calculations are accurate, reasonable, and in compliance with Commission's Orders in Docket No. G017/GR-20-719.

The Department recommends the Commission take the following action:

1. Approve a DSM financial incentive of \$2,900,388 for Otter Tail's 2021 CIP achievements.
2. Approve Otter Tail's 2021 CIP tracker account, as summarized in Table 2 above, resulting in a December 31, 2021, tracker balance of \$2,870,213.
3. Approve a revised CCRA rate of \$0.00890 per kWh effective October 1, 2022 or the first month after Commission approval, whichever is later. The revised CCRA rate will have the CCRC rate rolled into it, eliminating the CCRC per Commission Order in Docket No. G017/GR-20-719.
4. Grant Otter Tail a variance to Minnesota Rules 7820.3500(K).
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.

Sincerely,

/s/ANGIE SKAYER
Financial Analyst

/s/ CHRISTOPHER DAVIS
Rates COORDINATOR

AS/CD/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-22-165

Dated this **19th** day of **July 2022**

/s/Sharon Ferguson

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Generic Notice	Commerce Attorneys	commerce.attorneys@agate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	SPL_SL__CIP SPECIAL SERVICE LIST
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