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April 15, 2022

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

**RE: In the Matter of the Distribution System Planning for Otter Tail Power
Company
Docket No. E017/M-21-612
Reply Comments**

Dear Mr. Seuffert,

On November 1, 2021, Otter Tail Power Company (Otter Tail or the Company) filed its second Integrated Distribution Plan (IDP) in the above-referenced docket in response to filing requirements established by the Minnesota Public Utilities Commission's (Commission or MPUC) February 20, 2019 *Order Adopting Integrated Distribution Plan Filing Requirements* in Docket No. E-017/CI-18-253 and subsequently amended in the Commission's November 2, 2020 *Order Accepting Integrated Distribution Plan and Modifying Filing Requirements* (November Order) in Docket No. E-017/M-19-693.

On March 22nd, the Department of Commerce (DOC) provided initial comments in Docket No. E017/M-21-612; Otter Tail's 2021 Integrated Distribution Plan (IDP). Otter Tail respectfully submits the following Reply Comments to the DOC Comments. The DOC was the only party to file comments related to Otter Tail's 2021 IDP.

Otter Tail's 2021 IDP provided a detailed report of how distribution planning is completed as well as the current view of Otter Tail's distribution plans. Otter Tail believes the 2021 IDP meets the informational intent of the requirements set forth by the Commission and as such, requests approval as submitted. At this time, the DOC has not recommended approval of Otter Tail's IDP, but we believe the information provided here may fully satisfy any outstanding requests.

Otter Tail appreciates of the detailed and thorough review provided by the DOC as we strive to provide a report that is both helpful to the Commission and provides insight to Otter Tail's distribution planning process and plans. With the unique characteristics of Otter Tail's small towns and expansive service territory, Otter Tail's low rates are the result of rightsizing and right-timing of distribution investments necessary to reliably provide electric service.

The DOC requested additional information on several topics, each of which is addressed below:

- 1) The Department requests that OTP provide a narrative explanation of how the Company plans investments to address the reliability needs of its system. Given the decrease in spending in the 'System Expansion or Upgrades for Reliability and Power Quality' IDP Budget Category and a decrease in the SAIDI and SAIFI performance, are the Company's plans for spending in other IDP Budget Categories intended to address the reliability needs of its system?*

Within section 4 of the 2021 IDP, Otter Tail describes the planning process for identifying projects to address reliability needs on the system. Otter Tail would welcome the opportunity to discuss more specific questions with the DOC if they exist related to the process of project identification. In short summary, various inputs are included in the project identification phase which include but are not limited to, historical reliability data, load growth information, field and other employee feedback, customer feedback, asset vintage information, etc.

The Department raises two concerns in this question: one related to categories of budgeting and one related to reliability performance. To first address the concern of reliability performance, Otter Tail filed its 2022 Safety, Reliability, and Service Quality (SRSQ) on April 1, 2022. Within this filing, Otter Tail notes a correction in historical performance with a correction to how Major Event Days were calculated. With this correction, Otter Tail also updated 2019 and 2020 reliability data and subsequently provides 2021 reliability metrics. See Docket No. E-17/M-22-159 for more information. In short summary, storm normalized reliability metrics have reduced/improved in comparison to the prior report. The 5-year trend for CAIDI and SAIDI is somewhat linear and SAIFI shows an improving trend. It should be noted that due to the installation of a new interruption monitoring system (IMS), the data for years 2018 and earlier cannot be compared to data from 2019 and later on the same basis. A significant difference is that the new IMS captures outages from each of the three phases on the various feeders instead of single-phase monitoring as captured in the old system.

To then address the categories of budgeting related to reliability projects, Otter Tail notes the change observed is related to the classification of certain projects rather than a shift away from reliability in prioritization. Otter Tail's Area Engineers and Asset Management department monitor reliability and identify worst performing feeders and other system assets for repair or replacement to improve reliability performance.

Reliability overlaps all categories of distribution spend within the IDP to varying degrees. Otter Tail provided a reasonable assumption of what category was the main driver for each project. However, the categories of asset renewal and reliability have extensive overlap. For example, when distribution engineers are planning for system improvements (especially those not driven by capacity needs) they will look at places where aging assets need to be replaced but also where there may be reliability concerns. Because of the general understanding that new assets are more reliable than older assets, all asset renewal projects also improve reliability.

Though the categories have some level of subjectivity, Otter Tail believes they are reasonable and has no concerns with the current reporting structure. That said, projects may include elements of multiple categories.

- 2) *The Department requests that OTP provide clarification regarding what specific programs or equipment included under the project name of “SIRI – Innovation 2030” is attributed to each of the IDP Budget Categories of Age-Related Replacement and Asset Renewal and Grid Modernization and Pilot Programs.*

Within the 2021 IDP filing, Appendix B lists the project spend in each category of Asset Renewal (category A below) and Grid Modernization/Pilot Programs (category e below). Table 1 below is a quick summary of Appendix B for reference.

Table 1 – SIRI Innovation Spends in 2021-2025 Forecast

Fund Proj Number	Work Order Long Desc	MN IDP	Year	MN IDP Total
6412	SIRI - Innovation 2030	a	2021	\$597,743.61
6412	SIRI - Innovation 2030	e	2021	\$66,415.96
6412	SIRI - Innovation 2030	a	2025	\$2,720,589.37
6412	SIRI - Innovation 2030	e	2025	\$84,141.94
6412	SIRI - Innovation 2030	a	2023	\$702,427.68
6412	SIRI - Innovation 2030	e	2023	\$36,969.88
6412	SIRI - Innovation 2030	a	2024	\$1,211,452.65
6412	SIRI - Innovation 2030	e	2024	\$63,760.67
6412	SIRI - Innovation 2030	a	2022	\$1,476,439.71
6412	SIRI - Innovation 2030	e	2022	\$77,707.35

The programs and projects in each of these categories are as follows:

For Asset Renewal category:

- Increased underground (UG) replacement spends
- Increased distribution pole reject spends

For Grid Modernization and Pilot Program spend:

- Trip saver pilot spends
- Electronic recloser pilot spends

- 3) *The Department requests that OTP provide a detailed narrative of whether and how the Company's use of the 2016 PSE Report informed their short- and long-term distribution system planning and investments in Utility Reply Comments. OTP could provide an explanation of how the quantitative data and analysis provided in the PSE Report was incorporated into internal distribution system planning and studies and how it was and/or can be used to verify performance of the grid modernization initiatives discussed by OTP in this 2021 IDP and proposed for cost recovery in the recent EUIC Rider.*

The Department refers to an information request in Otter Tail's Electric Utility Infrastructure Cost recovery rider where Otter Tail is seeking recovery for various projects discussed in the 2021 IDP. The Department's comments seek additional explanation of the Company's use of a report created for Otter Tail in 2016 by Power System Engineering (PSE). As described in the EUIC information request, Otter Tail engaged PSE to review Otter Tail's business processes as well as systems and technology. From their assessment, PSE provided initial guidance and business cases for Otter Tail related to technology-based solutions that would improve company operations and customer service. While this assessment and report was useful as Otter Tail was formulating the projects that now comprise the I2030 portfolio, the report is more than 5 years old, and the assumptions are outdated.

The PSE report was a catalyst for further investigation into the technologies discussed in the report. The report was used to understand Otter Tail's deployment of various technologies in comparison to peers and the industry. The report itself did not constitute approval of the technologies and projects discussed. For example, AMI is discussed in the PSE report and has been discussed in each of OTPs prior IDP's from an informational basis. Preliminary AMI financials were discussed in the PSE report, however, formal approval of the benefits/costs analysis (BCA) and project approval did not occur until December 2021 as described in Otter Tail's EUIC filing. Similar analysis and approvals apply to both load management and the OMS project as described in the EUIC filing as well.

The PSE report identified areas for Otter Tail to continue research and investigation but none of the quantitative data from the report has been used in project justifications. As such, the report is not relevant for verifying performance of projects filed in the EUIC filing or other projects in the IDP. As an organizational approach, Otter Tail understands the EUIC or other recovery mechanisms to be the best venue to discuss particular project costs and justifications. The integrated distribution plan dockets establish the framework and philosophy within which Otter Tail discusses our vision for these investments.

OTHER ITEMS RECOMMENDED BY THE DOC

In addition to the items listed for Otter Tail's response above, the DOC listed additional recommendations for the Commission. Otter Tail provides a response to these as well.

- 4) *The Department recommends that the Commission require utility grid modernization proposals to adhere to the filing requirements, methods of evaluation, and ratepayer protections detailed in the Guidance Document.*

The Guidance Document referenced above came from a report that was issued in response to the Commission's order in Xcel Energy's 2017 and 2018 Transmission Cost Recovery Rider Petition and included comments from the DOC and a supporting report as an attachment from Synapse. The report and a letter from the DOC was filed in Otter Tail's 2021 IDP on February 9, 2022.

Otter Tail would like further review and discussion with the DOC before this recommendation is adopted to ensure Otter Tail has a full grasp on the request. For example, will all Grid Modernization projects be subject to the Guidance Document? There are some smaller Grid Modernization projects (such as those in Table 1 above) that likely do not warrant the level of metrics and tracking as outlined in the Guidance Document as it would add complexity and overhead for little value to Customers. In this vein, Otter Tail suggests a threshold be established, such as projects exceeding \$10 million, for applying the process described in the Guidance Document. Such a threshold would avoid committing extensive ratepayer resources, including hiring additional third-party consultants to perform analysis on projects that wouldn't require it. It's also possible applying this framework as a first step in cost recovery for some projects could hinder forward movement or at least slow down the speed of project development that would add significant value to customers.

Another area Otter Tail would like to review with the DOC is a concern for duplication of efforts. Otter Tail proposes the review and tracking outlined in the Guidance Document is best fit during a recovery request rather than the information filing of the IDP. For added clarity around the use and applicability of the Guidance Document, Otter Tail would appreciate the opportunity to have more dialog with the DOC, perhaps even in person or onsite at Otter Tail.

- 5) *The Department requests that in future filings regarding customer-facing utility offerings and programs that may be enabled by new investments in grid modernization technologies such as the OMS, LMS or potential future ADMS projects, Otter Tail Power provides the following information:*
- a. Internal benefit-cost analyses for reference and investment case scenarios, including reasonably known and analyzed alternatives;*
 - b. Assumptions and data supporting the projected customer participation rates;*
 - c. Sensitivity analysis for varying rates of adoption of proposed programs; and*
 - d. Discussion of how the proposed customer-facing utility offerings and programs may interact with existing or proposed Conservation Improvement Plan or Next Generation Energy Act programs.*

Otter Tail is not opposed to the idea of discussing "customer-facing offerings..." in future filings. However, further discussion around what defines a customer-facing offering as well as how to evaluate these offerings through a joint Otter Tail and DOC meeting(s) would be helpful before adopting this recommendation. Cost justifications and recovery questions should not be duplicated in this docket but are better suited for the EUIC or other recover mechanism as the IDP provides an information framework into distribution planning.

- 6) *The Department recommends that the Commission include OTP's IDP Filing Requirements in its Order in this and subsequent IDP proceedings, including a red-line version if modifications are made to OTP's IDP Filing Requirements.*

Otter Tail agrees this would be helpful. In addition, to continue to improve the reporting requirements, Otter Tail recommends Otter Tail and the DOC meet to discuss what requirements have been most helpful in reviewing the IDP and jointly recommend edits to the current requirements.

INFORMATIONAL UPDATES

Otter Tail would like to provide an update on the reference to an Advanced Distribution Management System (ADMS) within the EUIC filing and DOC reply comments:

Additionally, OTP has also recently informed the Commission that it has initiated planning for an Advanced Distribution Management System (ADMS) platform that includes the OMS mentioned above, as well as "other modules that Otter Tail plans to pursue in some future timeframe, such as volt-var optimization, load management controls, and automated system reconfiguration."

Since the initial filing of the EUIC, Otter Tail's planning has narrowed in on an OMS vendor who currently does not offer an ADMS platform. As such, Otter Tail does not foresee a full ADMS suite in our current plans. Otter Tail is focused on deployment and operation of an OMS as proposed in the EUIC filing.

Lastly, within the reply comments the DOC has highlighted the following recovery mechanisms for Grid Modernization:

As the Department's February 9, 2022 Letter indicates, there are three pathways available to utilities in Minnesota to propose grid modernization investments: the Certification Request Process (Path 1); a general rate case (Path 2); and the Electric Utility Infrastructure Cost (EUIC) Rider pursuant to Minn. Stat. §216B.1636 (Grid Modernization Path 3). The Certification Request Process (Path 1) is foreclosed to utilities not operating under a multi-year rate plan: because Otter Tail is not operating under a multi-year rate plan, it is not eligible to request certification of grid modernization investments nor request cost recovery through a Transmission Cost Recovery Rider (TCR) proceeding pursuant to Minn. Stat. §216B.16, subd. 7b(b)(5).

While Otter Tail is not seeking recovery of grid modernization investments through the Transmission Cost Recovery Rider, Otter Tail does not believe the statute forecloses this option from utilities not operating under a multi-year rate plan. While Minn. Stat. §216B.2425 Subd. 2(e) provides additional reporting for utilities operating under a multi-year rate plan, it does not limit the availability of certification to only such utilities. Clarification on this topic may be useful for utilities planning such investments.

CONCLUSION

Otter Tail's 2021 IDP describes the various projects and vision the Company is pursuing to better serve our customers in the future. The 2021 meets the intent set forth by the Commission which is to better understand the distribution planning process through an information filing. Otter Tail believes the filing meets the requirements set forth and as such, Otter Tail requests the Commission approve Otter Tail's 2021 IDP. In addition, Otter Tail recommends further dialog (perhaps in person at Otter Tail's campus) between Otter Tail and the DOC to refine IDP requirements to make the filing as informational and efficient as possible.

If you have any questions regarding this filing, please contact me at 218-739-8565 or at mriewer@otpc.com.

Sincerely,

/s/ *MICHAEL RIEWER*

Michael Riewer

Manager, System Infrastructure & Reliability

kaw

Enclosures

By electronic filing

c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of the Distribution System Planning for Otter Tail Power Company
Docket No. E017/M-21-612**

I, Kim Ward, 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
Reply Comments**

Dated this 15th day of April, 2022.

/s/ KIM WARD

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