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May 26, 2022

Mr. William Seuffert  
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 2021 Annual Safety,  
Reliability and Service Quality Report and Proposed SAIFI, SAIDI and  
CAIDI Reliability Standards for 2022  
Docket No. E017/M-22-159  
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) respectfully submits to the Minnesota Public Utilities Commission these Reply Comments in response to the Comments received from the Department of Commerce, Division of Energy Resources (Department) dated May 16, 2022, in the above referenced docket.

**Otter Tail's Response to Department's discussion requests**

- 1. Why the number of days of job transfer or restriction and days away from work metrics are trending higher than the 10-year average.*

Due to an injury that resulted in surgery for repair the number of Days Away were elevated from past years. This was a single incident which Otter Tail incurred and was unfortunate. The employee engaged with an Injury Intervention entity to recover by self-care, unfortunately, the injury would need medical attention to repair. The number of days restricted or transferred were also elevated due to a couple of injuries where restrictions were set by a medical provider for these cases which drove the total upward. We believe that all injuries are preventable and continue to train, educate, and promote safe work behaviors and habits in our employees.

*2. Why the number of complaints in 2021 increased by 277 percent over 2020.*

In May 2021, Otter Tail completed a specific training with our Customer Service Representative (CSR) team, specifically on complaints. The training included discussion of complaint definition and various situations that a CSR could encounter that could constitute a complaint. This training was intended to provide more clarity surrounding complaints and to enhance their ability to identify if the situation presented is a complaint. Otter Tail completed a follow up session with our CSR team in September 2021 when enhancements to simplify the complaint process within our Customer Information System were completed.

Otter Tail feels that the increase in complaints is due to complaint training sessions and enhancements within our customer information system. This increase represents a change in categorization of the calls received more than a change in level of satisfaction with the service provided to customers. Customer satisfactions for Otter Tail's customers remains very high.

We are available to provide additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8699 or [wolson@otpc.com](mailto:wolson@otpc.com).

Sincerely,

/s/ WENDI A. OLSON

Wendi A. Olson

Regulatory Compliance Specialist

tlk

Enclosures

By electronic filing

c: Service List

## **CERTIFICATE OF SERVICE**

**RE: In the Matter of Otter Tail Power Company 2021 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2022  
Docket No. E017/M-22-159**

I, Tammy Kubela, 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 **26<sup>th</sup>** day of **May, 2022**

/s/ TAMMY KUBELA

Tammy Kubela  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8807

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_22-159_22-159
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-159_22-159
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_22-159_22-159
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_22-159_22-159
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-159_22-159
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496  Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_22-159_22-159
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_22-159_22-159
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_22-159_22-159
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-159_22-159
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-159_22-159

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Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-159_22-159
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-159_22-159
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-159_22-159
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-159_22-159
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_22-159_22-159
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_22-159_22-159