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September 2, 2022



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

**RE: In the Matter of Otter Tail Power Company's Petition for
Approval of the Annual Forecasted Rates for its Energy Adjustment Rider,
Rate Schedule 13.01
Docket No. E017/AA-20-462
In the Matter of Otter Tail Power Company's Petition for
Approval of the Annual Forecasted Rates for its Energy Adjustment Rider,
Rate Schedule Section 13.01
Docket No. E017/AA-21-311
In the Matter of an Investigation into Self-Commitment and Self-Scheduling of
Large Baseload Generation Facilities
Docket No. E999/CI-19-704
Letter**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) a letter of explanation in the above-referenced matters.

At the Commission's June 30, 2022, Agenda Meeting where Otter Tail's true-up of the 2021 calendar year Energy Adjustment Rider mechanism was approved in Docket No. E017/AA-20-462, the Commission requested Otter Tail provide clarification related to Otter Tail's experience utilizing Economic Offers for its baseload units.

This letter addresses the Commissioners' questions/requests for clarification of Otter Tail's experience in 2022. It also provides background on how Economic Offers and Self-commitment strategies are utilized to coordinate baseload generation units with market price signals. As is explained in this letter, it would not be correct to assume that it is preferable in all market circumstances to put such units on an economic offer status; in fact, historically, the market conditions in which such a strategy is preferable have occurred infrequently. Instead, as will be explained, it is often preferable to have such units on a self-commit status.

For baseload generation, utilizing a strategy of self-commitment is often preferable to utilizing a strategy of economic offers, especially during times of market price variability.

We first want to address a common misconception that utilization of economic offers for baseload generation is always the most economic decision. It is often not the most economic decision. The misconception may in part be based on recent experience when the energy markets have been very low and generally stable (i.e. over the past few years, and up to the winter of 2021, after which energy market dynamics appear to have changed significantly).

Large baseload generation facilities are limited in their ability to respond to market prices if put on economic offer status, but they are highly flexible if put on self-commitment status.

When on an economic offer status, their operational limitations can be categorized around two elements:

- 1) **It takes a significant amount of time to take Otter Tail baseload coal units from zero output to their minimum output. The below table provides minimum¹ startup times for Big Stone Plant and Coyote Station.**

Operating State	Big Stone Plant	Coyote Station
Cold Startup Time	15 Hours	15 Hours
Warm Startup Time	5 Hours	5 Hours
Hot Startup Time	2 Hours	2 hours

- 2) **They must run at least at their minimum output.** There is *no* flexibility from zero output to their minimum output, but they have a *very high* degree of flexibility in the range from their minimum output to their maximum output.

Operational limitations are not unique to large baseload units and comparing the value of generators based on operational flexibility alone would not be wise. For example, wind and solar units have a much higher degree of operational limitation and are therefore generally viewed as “non-dispatchable.” Natural gas peaking units are very flexible. But flexibility of operations is not the only consideration, so natural gas peaking generators are not the most preferred generation resources for all purposes and renewable generators are not the least preferred. Instead, utilities generally consider portfolios of resources with some units providing flexibility and other elements providing other desired characteristics (e.g. low overall fuel costs, renewable attributes, etc.). For these reasons, it is usually thought more proper to evaluate the flexibility (and other characteristics) of the portfolio *as a whole*, rather than evaluate any one resource in isolation.

Nevertheless, to consider the preferability of a commitment strategy for Otter Tail’s baseload facilities, we will compare the degree of flexibility if self-committed and the degree of flexibility if put on economic offer status. In each case, there are elements of flexibility and elements of inflexibility that should be considered, along with the market contexts that may make either strategy preferable.

Here is a practical example of how these phenomena can play out. If a coal-fired unit utilizes an economic offer during times of high energy market price volatility, and is thereby economically committed, the unit could also be quickly decommitted (shut-down) if market prices decline.

¹ Startup times can be considerably longer due to several factors (i.e. required water balancing, water chemistry adjustments, etc.).

Subsequently, if market prices increase significantly, customers will be exposed to those high market prices while the baseload unit is off-line (note the lengthy startup times in the table above). The mechanical limitations inherent in the design of these units restrict their ability to quickly begin generating electricity once shut down. If this happens during peak hours or during significant weather events when market prices abruptly rise significantly higher than expected, the financial impacts to customers could be significant. On the other hand, if a self-commitment status is utilized for the same unit during the same market conditions, the unit would run at minimum output while market prices are lower but will be able to respond quickly and precisely when market prices increase and fluctuate.

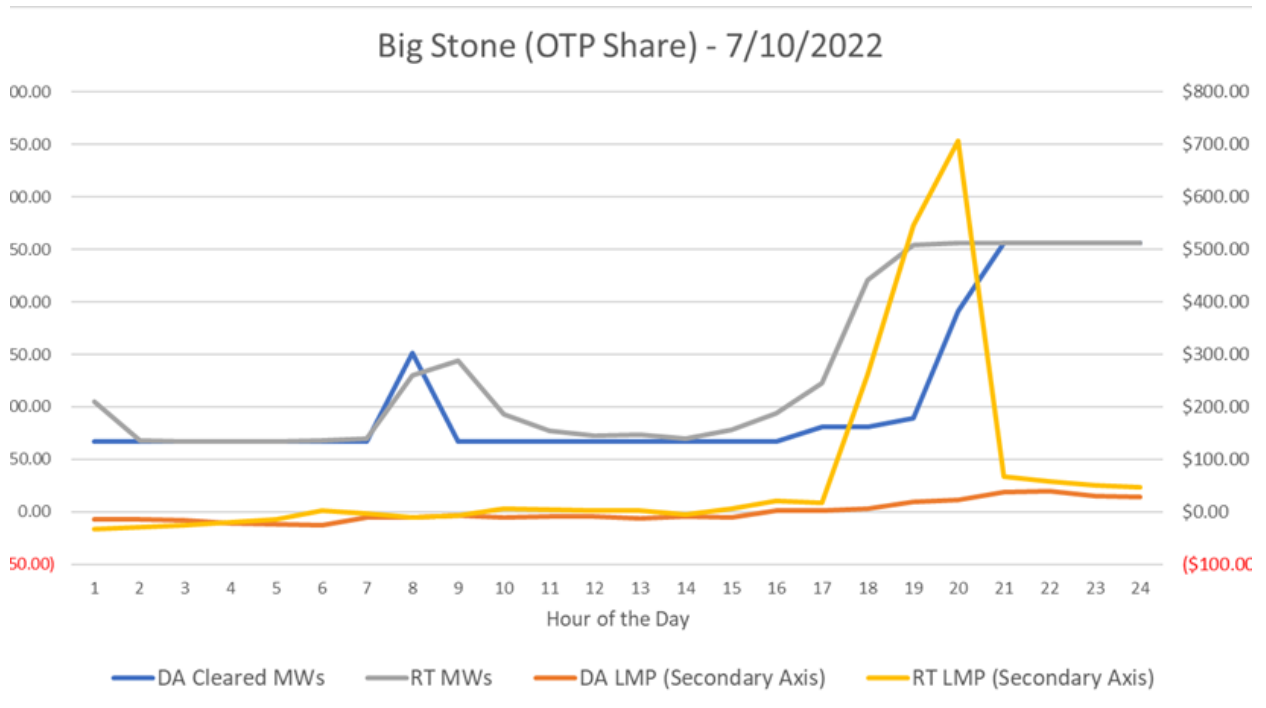
It is important to highlight when market conditions are sub-optimal under Self-Commitment, the unit will only operate at minimum output (i.e. the OTP minimum share of Big Stone is 67.4 MWs), but, when market prices increase, the unit will ramp up to full output (i.e. the OTP maximum share of Big Stone is 256.0 MWs). The ability to increase and decrease output, based on prevailing market conditions, decreases the financial impact during suboptimal market conditions and amplifies financial benefit during optimal market conditions. Self-Commitment at minimum output, utilizing consistent and relatively low-cost fuel (\$20-\$30 per MWh), serves as a valuable hedging tool against volatile market pricing. The flexibility of self-committed baseload units to respond to unforeseen market conditions is very valuable. Economic decommissioning of baseload units, paired with an inflexibility to respond to quickly changing market conditions can, at times, be detrimental to customer interests. Furthermore, flexibility is not only advantageous from a financial perspective, but also from a reliability and capacity perspective.

An example of this occurred on July 10, 2022. Big Stone Plant was self-committed per the request of a non-Otter Tail co-owner. It appears that if not for the self-commitment request, the Mid-Continent Independent System Operator (MISO) Day-Ahead process (based on posted Locational Marginal Pricing (LMP)) would have chosen to decommit the unit (unit would have been off-line). For this day, day-ahead market revenues are estimated to have been \$26,800 with expected fuel costs of \$64,950. This results in a net variable cost of \$38,150, hence the expectation is that MISO would have economically decommitted the unit.² However, because Big Stone Plant was self-committed (online and operating), it was available to ramp up production over several evening hours where Real-Time pricing experienced a dramatic increase. Had Big Stone Plant been decommitted earlier in the day based on Day-Ahead pricing, Big Stone Plant would not have been available to capture the Real-Time pricing opportunities, nor would have been available for capacity or reliability purposes. The results of Big Stone Plant being self-committed and available resulted in an approximate \$120,000 benefit to customers.³

The graph below illustrates the Day-Ahead and Real-Time conditions on July 10, 2022. In this case, it only took 3 hours of volatile, increased Real-Time pricing for the flexibility associated with the self-commitment status to provide considerable value. An economic decommissioning would not have been able to respond to, or capture, this value.

² Day-Ahead LMP pricing would have resulted in market revenues of \$26,800. Estimated cost of variable fuel (\$24.71/MWh) for Day-ahead commitment would have totaled \$64,950. Variable daily net margin = (\$26,800 - \$64,950) = -\$38,150 (If not self-committed by the co-owners, MISO would have likely directed economic decommissioning).

³ Day-Ahead plus Real-Time market revenues were \$199,200. Estimated cost of variable fuel (\$24.71/MWh) for total generation produced totaled \$79,600. Daily Day-Ahead and Real-Time net margin = (\$199,200 - \$79,600) = \$119,600 (Benefit to Otter Tail customers).



It should be noted that MISO utilizes a single day commitment and dispatch process. This means that market conditions for a given day, and that day only, would need to justify the economic commitment (or decommitment) and dispatch of a unit. This often includes a large startup cost for baseload plants and may artificially increase cycling of the unit. The single day commitment and dispatch process does not consider the economics of running a baseload plant across multiple days. Self-Commitment can act to prevent unnecessary cycling and allows for assurance of runtimes for periods greater than the current single day MISO commitment process. MISO has explored the possibility of a multi-day commitment process but does not currently have plans for development or implementation in the foreseeable future.

What has been Otter Tail’s experience thus far in 2022 in utilizing an economic offer for its base load units (Big Stone Plant and Coyote Station)?

For the January through July 2022 period, Otter Tail’s Big Stone Plant and Coyote Station were primarily Self-Committed into the MISO and SPP markets. Big Stone was economically decommitted on April 23, 2022, and remained offline until May 2, 2022, when both markets (MISO and SPP) cleared the unit in the day ahead market. The unit was offline for nine full days. Big Stone Plant was also economically decommitted on May 30, 2022, and remained offline until May 31, 2022, when the SPP market cleared the unit in the day ahead market. Coyote Station had not been offered economically during this period. It has only been offered as Self-Committed or on outage.

While Otter Tail acknowledges the benefits associated with periods of self-commitment, Otter Tail also recognizes the value of an economic offer status when there is a high confidence that certain market conditions exist and will persist. Furthermore, through the joint-owned unit co-owner offer meetings, Otter Tail sometimes recommends utilization of an economic offer, but as a co-owner in both Big Stone Plant and Coyote Station, we are subject to the terms of the operating agreement and the rights and privileges it affords to all the co-owners.

The Big Stone and Coyote plant ownership agreements require the co-owners to take the energy associated with their ownership shares of the plant whenever another co-owner calls for commitment and dispatch. The call for commitment can come directly from a co-owner (Self-Commitment) or via an ISO commitment request under an economic offer. The Southwest Power Pool (SPP) and MISO markets do not coordinate the commitment and dispatch of co-owned units straddling the MISO/SPP market seam. Furthermore, both markets model the shares of a co-owned unit as individual, separate and distinct generators. When each co-owner's share of the unit is offered as economic, it is possible only a portion of the entire unit would be dispatched. From a practical standpoint, since the plant is one physical generator, dispatch of a single co-owner's share of the plant will result in all co-owner's shares being dispatched.

As mentioned previously, Otter Tail recognizes the value associated with utilization of an economic offer when there is a high confidence that certain market conditions exist and will persist. Frequently, through the joint-owned unit co-owner offer meetings, Otter Tail recommends utilization of an economic offer. However, non-Otter Tail co-owners often prefer the risk mitigation, and dispatch flexibility, associated with Self-Commitment. This has been especially true under market conditions and pricing in 2022. Per the co-owner operating agreements, when one co-owner requests Self-Commitment, all the other co-owners are obligated to self-commit their share of the unit to minimum levels. Otter Tail continues to recommend economic commitment when it is prudent based on market and plant conditions, but we cannot argue that reasonable owners can prefer self-commitment during those same periods, based on their market assessments and their perspectives on the value of a higher degree of risk mitigation. Again, it would not be correct to assume that it is preferable in all market circumstances to put such units on an economic offer status, and each owner must exercise its judgement as to which status is preferable at the given time.

How does the Self-Commitment of Big Stone and Coyote in the SPP affect the commitment and dispatch of these units in MISO? What is Otter Tail's assessment of Big Stone and Coyote dispatch in SPP compared to MISO?

SPP market pricing can favor commitment of MISO's Big Stone and Coyote shares even when MISO market conditions might otherwise indicate that an economic offer might be reasonable. MISO share commitment can be imposed through an economic or reliability commitment stemming directly from SPP or when an SPP co-owner requests Self-Commitment (if one co-owner's share is committed, all co-owners' shares must be committed). Generally, the higher the forecasted LMPs the more likely a co-owner will request self-commitment. Conversely, the dispatch of MISO's Big Stone and Coyote shares are not impacted by SPP pricing or SPP dispatch. Independent of SPP market pricing, MISO shares will be dispatched based solely on MISO pricing. During low-priced MISO market periods, the MISO shares of Big Stone and Coyote will be dispatched down to minimum output. During high priced MISO market periods, the MISO unit shares will be dispatched up to maximum output.

The below table summarizes 2022 average monthly LMP pricing (\$/MWh) at Big Stone Plant and Coyote Station in both MISO and SPP.

Month	Big Stone		Coyote	
	MISO	SPP	MISO	SPP
Jan-22	(\$5.22)	\$31.26	\$41.57	\$36.88
Feb-22	\$4.77	\$19.07	\$42.21	\$33.59
Mar-22	\$9.90	\$10.19	\$26.57	\$18.50
Apr-22	(\$2.31)	\$12.91	\$31.56	\$23.29
May-22	\$18.63	\$29.78	\$40.06	\$37.25
Jun-22	\$29.95	\$34.77	\$36.28	\$44.79
Jul-22	\$42.53	\$51.38	\$44.43	\$59.34

As noted in the above table, Big Stone LMP pricing is consistently and considerably higher in SPP than in MISO. Except for March and April, the average monthly SPP LMP price has been near or above the Big Stone variable fuel costs. Given that the other Big Stone co-owners maintain a preference for self-commitment, and one co-owner being a member of SPP where LMP pricing is considerably higher, the co-owner request for Big Stone Self-Commitment has been prevalent throughout most of 2022. Despite the resulting, required, commitment for the Otter Tail share of the unit, flexibility of dispatch between minimum and maximum output has allowed us to optimize the financial impact to customers. While the months of January through April were suboptimal from a MISO pricing standpoint, May through July have been very strong months for Big Stone Plant.

Coyote LMP pricing has been more comparable between the ISOs, with MISO exceeding SPP January through May, and SPP exceeding MISO in June and July. In all cases, the average, monthly, day-ahead LMP price has been well above the variable cost of Coyote Station. Again, given the other co-owners' preference for Self-Commitment, Coyote has been exclusively offered as Self-Committed throughout 2022. Year to date, Coyote has only experienced a handful of days where variable fuel costs exceeded market revenues. Coyote Station experienced an extended, planned outage from the end of March through the end of May.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8562 or at wraeder@otpc.com.

Sincerely,

/s/ WILLIAM RADER
William Rader
Supervisor, Regulatory Analysis
Regulatory Administration

vjm
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for
Approval of the Annual Forecasted Rates for its Energy Adjustment
Rider, Rate Schedule 13.01
Docket No. E017/AA-20-462
In the Matter of Otter Tail Power Company's Petition for
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In the Matter of an Investigation into Self-Commitment and Self-
Scheduling of Large Baseload Generation Facilities
Docket No. E999/CI-19-704**

I, Valerie Moxness 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
Letter**

Dated this **2nd** day of **September, 2022**.

/S/ Valerie Moxness
Valerie Moxness
Regulatory Filing Coordinator
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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_21-311_AA-21-311
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