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June 1, 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 Commission Consideration and Determination of Compliance
with Renewable Energy Standards for Year 2021
Docket No. E-999/PR-22-12**

**In the Matter of Commission Consideration and Determination of Compliance
with Renewable Energy Standards (RES) Biennial Reporting
Docket No. E-999/M-22-85**

**In the Matter of the Green Pricing Verification Filing Process
Docket No. E-999/PR-02-1240**

Dear Mr. Seuffert:

In response to the Minnesota Public Utilities Commission Notice issued in the above-described matters, Otter Tail Power Company hereby submits its Renewable Energy Certificate Retirement Report for Renewable Energy Standards and Green Pricing Programs. This report is composed of one attachment. This Attachment A is the REC Retirements and Biennial Compliance.

Also included as a supplement to this filing is an overview of Otter Tail's proposed plan for solar energy standard compliance and Otter Tail's approach for ensuring solar-exempt customers are excluded from the costs associated with Otter Tail's compliance.

This filing has been served on all persons on the attached service lists by electronic service or by first class mail. A Certificate of Service is also enclosed.

Should you have any questions, please contact me at mmthompson@otpc.com or (218) 739-8545.

Sincerely,

/s/ MIKAYLA THOMPSON
Mikayla Thompson
Business Coordinator, Supply Engineering

kaw
Enclosures
By Electronic filing
c: Service Lists

Otter Tail Power Company
Supplement to June 1, 2021 Annual RES/SES Compliance Filing
Solar Energy Standard Compliance Plan

I. INTRODUCTION

Beginning in 2020, Minnesota public utilities are required to report compliance with Minnesota's Solar Energy Standard (SES). Minn. Stat. § 216B.1691, Subd. 2f (a) provides the following:

***Subd. 2f. Solar energy standard.** (a) In addition to the requirements of subdivisions 2a and 2b, each public utility shall generate or procure sufficient electricity generated by solar energy to serve its retail electricity customers in Minnesota so that by the end of 2020, at least 1.5 percent of the utility's total retail electric sales to retail customers in Minnesota is generated by solar energy.*

The statute also requires that certain customers be exempt from the costs incurred by a public utility to comply with the SES. In particular, Minn. Stat. § 216B.1691, Subd. 2f (f) provides the following:

(f) For the purposes of calculating the total retail electric sales of a public utility under this subdivision, there shall be excluded retail electric sales to customers that are:

(1) an iron mining extraction and processing facility, including a scam mining facility as defined in Minnesota Rules, part [6130.0100](#), subpart 16; or

(2) a paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer.

Those customers may not have included in the rates charged to them by the public utility any costs of satisfying the solar standard specified by this subdivision.

In this Supplement, Otter Tail describes its proposed approach to recover SES compliance costs while ensuring solar-exempt customers are excluded from recovery for such costs. Otter Tail's approach will apply to costs associated with both SRECs as well as costs associated with Otter Tail's investment in small (less than 40 kW) solar generating facilities going forward.

Otter Tail Power Company (Otter Tail) complied with 2021 non-small SES requirements and partially complied with 2021 small-scale SES requirements through the purchase and retirement of solar renewable energy credits (SRECS) at a cost of \$75,531. Recovery of these costs will be requested in a future Renewable Resource Cost Recovery (RRCR) rider filing Otter Tail will submit later in 2022.

II. SES – LESS THAN 40-KILOWATTS

Minn. Stat. § 216B.1691 provides the following compliance requirement for solar devices sized at 40 kilowatts or less:

Subd. 2f. Solar energy standard. (C)(1) must meet at least ten percent of the 1.5 percent goal with solar energy generated by or procured from solar photovoltaic devices with a nameplate capacity of 40 kilowatts or less;

Otter Tail met the small-scale solar requirement for 2020 as shown in its June 1, 2021 compliance filing in Docket Nos. E-999/PR-21-12 and E-99/PR-02-1240. As indicated in this filing, Otter Tail relied on a combination of SRECs from small customer systems, two small Otter Tail owned systems, and qualifying SRECs purchased from generators outside Otter Tail's service area in meeting the small-scale solar component of the standard.

Meeting the small-scale solar ten percent component for the 2021 program year was extraordinarily challenging. While Otter Tail continued to grow its SREC inventory from customer-owned systems, the marketplace for purchasing small SRECs outside of Otter Tail's service area became non-existent abruptly and unexpectedly. Otter Tail had many discussions with REC brokers and no small SRECs are available to purchase. With no liquid marketplace to purchase qualifying small SRECs to supplement the Company's other small SRECs, the Company fell short of meeting the small-scale solar ten percent component for 2021.

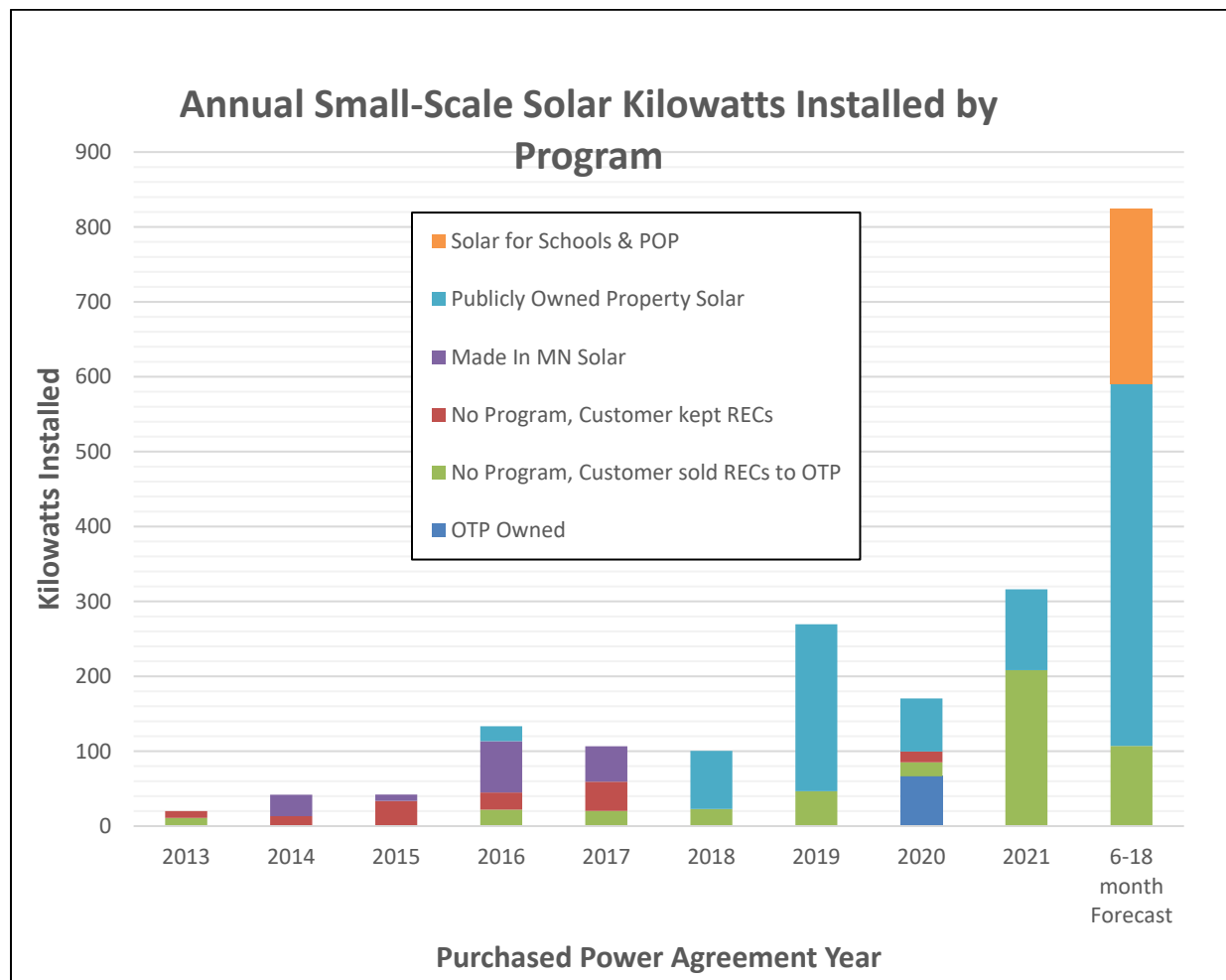
Otter Tail's Annual Report on Progress in Achieving the Solar Energy Standard, filed in Docket No. E-999/M-20-464 on June 1, 2020, describes the challenges that Otter Tail faces in meeting the less than 40-kilowatt (small-scale) requirement. To date, Otter Tail has relied on a number of strategies to meet the small-scale requirement, including: SRECs from systems installed with Made in Minnesota solar incentives, two solar projects owned by Otter Tail, Publicly Owned Property (POP) solar incentives, purchases of qualifying non-customer small SRECs, and SRECs from organically occurring customer solar installations completed with no specific incentives or rebates.

Additionally, on November 1, 2021, Otter Tail filed a modification to its Conservation Improvement Program's (CIP) Triennial, Docket No. E017/CIP-20-475, to include funding for solar on newly constructed Habitat for Humanity homes. Otter Tail believed solar paired with Habitat for Humanity homes would lessen energy burden, making home ownership an easier reality for participating families. The Department's Decision on January 31, 2022, denied the Habitat for Humanity Solar program due to the lack of cost-effectiveness of the measure.

Chart 1 below shows the annual installation of small-scale solar capacity (kW) by program. Otter Tail's diverse approach to meeting the small-scale requirement has faced

many challenges. For example, Otter Tail's POP solar program offers a rebate at approximately fifty percent of project costs, but even after widespread promotion of the program, funds were not fully spent during several years. Otter Tail's electricity rates remain very low, which benefits customers, of course. At the same time, these low rates often result in unreasonable payback periods for customers considering investments in solar PV systems, even when significantly subsidized. Moreover, customers willing to invest in solar arrays are not always interested in selling their RECs. Some customers retain the RECs for their own purposes, and some others are precluded from selling RECs because they are governmental entities with their own renewable goals (for which they must retire their RECs). Lastly, a modest uptick in solar installations in Otter Tail's rural service territory in 2019 has not carried through in subsequent years. The 2020 COVID pandemic decreased solar projects and recently led to inflation that is causing solar project price increases and longer material lead times. These issues make solar installations especially challenging in the small, rural communities served by Otter Tail.

Chart 1



III. REQUEST FOR AUTHORITY TO MEET THE SMALL-SCALE SES REQUIREMENT THROUGH THE COMPANY OWNERSHIP OF 40 KILOWATT SOLAR SYSTEMS

A. Forecasted SES Compliance Shortfall

To meet the small-scale SES requirement Otter Tail needs 3,792 small SRECs or approximately 2.9 MW of installed solar capacity.¹ Currently Otter Tail has 1.1 MW or 1,389 SRECs under contract on an annual basis. This leaves Otter Tail a shortfall of approximately 2,403 small SRECs or 1.8 MW (about two-thirds short) of the small SES requirement. As shown in the right column of Chart 1, Otter Tail is forecasting approximately 0.9 MW to be installed in the next 6 to 18 months based on projects identified through the State of Minnesota's Solar for Schools program, projected Tribal Government projects, and estimated standard non-rebated customer projects. Including these upcoming projects in Otter Tail's forecast still presents a SREC shortfall of 1,191 small SRECs (about one-third short) for the 2022 program year that will be filed on June 1, 2023. This shortfall likely will remain for the 2023 and 2024 program years. Forward-looking growth is expected to be more moderate.

Otter Tail proposes a supplemental strategy to fill the forecasted small SREC shortfall to meet the small-scale SES compliance in a timely manner. Otter Tail requests authority to commence the activities necessary to secure the amount of small solar projects to meet the small SES compliance requirements by building up to approximately 30 company-owned, 40 kW alternating current (AC) solar arrays totaling 1.2MW. Implementing this strategy is a multi-step process (securing land and/or land leases, permitting, and interconnections) that Otter Tail cannot commence without first gaining the Commission's authority to do so.

Table 1 below, describes the total small SRECs needed for annual compliance (A). Table 1 includes a forecast of small SRECs being added over the next 6-18 months (G), and lastly estimates a need for approximately twenty-three additional 40kW systems to be needed to meet the small-scale SES compliance for program year 2023 (2024 SES Report). Otter Tail proposes to build up to 1.2MW, approximately thirty small solar projects. Otter Tail's requested Company-owned solar systems would represent approximately one-third of the solar capacity needed for compliance. The remaining two-thirds capacity would be customer owned solar systems. The Company will include a new forecast in its program year 2022 (2023 SES Report) and, if approved, provide an update

¹ Otter Tail estimates that 1MW (1,000 kW) of installed alternating current (AC) capacity produces 1.3 MWH or 1.3 SRECs annually. Energy production varies based on each individual site location and type of equipment installed. Estimates are based on inputs using [PVWatts Calculator \(nrel.gov\)](https://www.nrel.gov/pvwatts/) using Fergus Falls, MN.

on the number of company-owned projects still needed to meet compliance. Otter Tail's objective is to supplement customer projects and timely fill the compliance shortfall. To be clear, were it not for the abrupt and unanticipated unavailability of small SES, the Company would not likely propose Company-owned small solar projects.

Table 1 Small SREC Compliance and Forecast Need

A	B	C	D	E
Small SRECs Needed for Annual Compliance	Estimated # of Small SREC Generated Annually	Remaining Small SRECs Needed Annually (A-B)	Est. Additional MW Needed to Meet Compliance (C/1300)	Estimated # of 40kW Projects Needed for Small SREC Compliance (D*1000/40)
3,792	1,389	2,403	1.8	46
F	G	H	I	J
6-18 Month Installed MW Forecast	Est. SRECs Associated with 6-18 Month Forecast	Est. # of Remaining SRECs Needed for Annual Compliance, Net 6-18 Month Forecast (C-G)	Est. Additional MW Needed to Meet Compliance (H/1300)	# of Additional 40kW Projects Needed for Small SREC Compliance (I*1000/40)
0.9	1,211	1,191	0.9	23

A. Expected Costs and Recovery of Small-Scale Solar

Otter Tail requests the Commission authorize the Company to meet the small SES through Company-owned 40kW solar systems. If the Commission grants this request the Company will file detailed plans, cost estimates and a cost recovery plan similar to the recent cost recovery approved for the larger Hoot Lake Solar (HL Solar) project. All costs and benefits of the solar energy would be allocated to Minnesota customers only. The company believes the HLS project, currently under construction now through 2023, will create synergies with the construction of the smaller 40kW systems and deliver small-scale solar at a lower cost than typical small solar systems. Otter Tail can use existing contracts to capture economies of scale through purchasing solar panels for the small-scale projects at a low utility-scale cost.

Otter Tail believes the cost of Company-owned solar will be similar to the \$1,500/kW rebate it pays to its customers participating in POP Solar. Furthermore, Company-owned projects would be even more beneficial to Otter Tail customers than is the POP solar program, as all energy produced by Company-owned projects would be utilized to serve all customers rather than just serving the participating customer as occurs with the POP solar program.

B. Customer-Hosted / Otter Tail Owned Solar

One of Otter Tail's strategies with its POP solar program is to showcase small solar projects to many communities throughout the Company's service area. The Company has found that POP projects are frequently occurring within the same public entities, where interest in solar energy is most high.

Otter Tail's plan for ownership would include a strategy to distribute the small solar projects throughout many of its Minnesota communities to bring public awareness to the technology and add many positive local impacts. Several projects may be placed on OTP owned property, but the focus of this program will be to place as many solar projects as possible in a geographically diverse number of Minnesota communities. The Company would recruit customers with land space, optimal solar exposure, and proximity to the distribution system to maximize solar production and minimize costs.

The Company would lease the property from participating customers similar to the Company's 33.3kW (AC) project with the Jamestown (North Dakota) school district. In 2019, the Company partnered with the Jamestown school district to place a small solar array on school property but connected directly to the Otter Tail distribution system. All energy from the solar project flows back to the grid for all customers to utilize in the area. Otter Tail owns and maintains the solar panels and it made a one-time upfront payment to the school to lease the property for the life of the solar project. The partnership between Otter Tail and the Jamestown school district has been a success as it provides local renewable energy, local renewable awareness, a payment to the hosting customer, reduces system energy losses, and it supports the local distribution system. The proposed Company-owned small solar projects being offered in this filing will provide further benefits to all Minnesota customers as they will be installed at a much lower up-front cost, likely less than half the costs of traditional small-scale solar installations.

IV. RENEWABLE RIDER COST RECOVERY

Otter Tail included in its current RRCR rider filing,² costs incurred for Otter Tail's compliance with the SES for 2020. These costs included the SRECs obtained and retired for the 2020 recovery year which were expensed in the spring of 2021 when the SRECs were retired.

Otter Tail anticipates using the RRCR on an on-going basis for both SRECs recovery as needed, as well as the initial recovery of costs associated with new solar generation such as the Hoot Lake Solar farm or the proposed Company-owned 40kW solar projects.

² Docket No. E017/M-21-830.

V. RECOVERY RATES AND SOLAR EXEMPT CUSTOMERS CREDIT

As noted earlier, certain wood products and mining customers are exempt from incurring costs associated with SES compliance. Otter Tail has addressed the exempt customer issue in Docket No. E017/M-21-830.

VI. OTHER CONSIDERATIONS

A. Solar Costs in Base Rates

In the future, recovery of solar costs will likely become part of base rates as projects transition into base rates in the context of a rate case. There will still need to be a tracker that identifies the amount of solar costs included in base rates that will be necessary to compute the applicable credit returned to the solar-exempt customers. This credit would be set in a rate case for those solar costs in the test year and remain fixed until updated in the next rate case. Otter Tail anticipates any subsequent solar costs included in the RRCR would require an additional credit computation for solar exempt customers that would be combined with any “base credit” established in a rate case.

VII. CONCLUSION

Consistent with the Company’s proposed RRCR rider filing, Otter Tail’s proposed plan outlines its approach to ensuring solar-exempt customers are excluded from the cost of Otter Tail’s SES compliance.

The Company believes a supplemental approach is needed to fill the forecasted small SREC shortfall in a timely manner. Otter Tail requests the Commission to grant the Company authority to meet the small-scale SES requirement through the construction and ownership of up to 1.2MW (approximately thirty 40kW AC) of solar projects. If this request is approved the Company would make a filing detailing costs, program details, recovery strategy, and timing of projects. Otter Tail’s requested Company-owned solar systems would represent approximately one-third of the solar capacity needed for compliance; the remaining two-thirds capacity would be customer-owned solar systems. Otter Tail’s proposal is a low-cost approach to meeting small SES requirement and can showcase solar energy in many of its Minnesota communities by partnering with its customers to provide numerous local benefits.

CERTIFICATE OF SERVICE

**RE: In the Matter of Commission Consideration and Determination of
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**In the Matter of Commission Consideration and Determination of
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Reporting
Docket No. E-999/M-22-85**

**In the Matter of the Green Pricing Verification Filing Process
Docket No. E-999/PR-02-1240**

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
Report**

Dated this **1st** day of **June, 2022**.

/S/ KIM WARD

Kim Ward
Regulatory Filing Coordinator
Otter Tail Power Company
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(218) 739-8807

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Mark	Rathbun	mrathbun@grenergy.com	Great River Energy	12300 Elm Creek Blvd Maple Grove, MN 55369	Electronic Service	No	OFF_SL_22-85_M-22-85
Michael	Reinertson	michael.reinertson@avante nergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-85_M-22-85
Generic Notice	Residential Utilities Division	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_22-85_M-22-85
John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company	104 S. Pine St. Grantsburg, WI 54840	Electronic Service	No	OFF_SL_22-85_M-22-85
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_22-85_M-22-85
Laura	Sandwick	lm.sandwick@smmpa.org	Southern MN Municipal Power Agency	500 1st Ave SW Rochester, MN 55902-3303	Paper Service	No	OFF_SL_22-85_M-22-85
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_22-85_M-22-85
J.P.	Schumacher	jps@mrenergy.com	Missouri River Energy Services	N/A	Electronic Service	No	OFF_SL_22-85_M-22-85
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_22-85_M-22-85
Trevor	Smith	trevor.smith@avantenergy. com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_22-85_M-22-85

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_22-85_M-22-85
Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_22-85_M-22-85
Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company	215 S Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-85_M-22-85
Todd	Wicklund	twicklund@bpu.org	Brainerd Public Utilities	8027 Highland Scenic Road PO Box 373 Brainerd, MN 56401	Electronic Service	No	OFF_SL_22-85_M-22-85