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March 14, 2015



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

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval
of a New Base Cost of Energy
Docket No. E017/MR-15-1034
REPLY COMMENTS**

Dear Mr. Wolf:

Enclosed for filing in the above-referenced matter are Otter Tail Power Company's (Otter Tail) Reply Comments.

Otter Tail has electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General-Antitrust & Utilities Division. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpc.com.

Sincerely,

/S/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration

jch
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of the Petition of
Otter Tail Power Company for Approval
of a New Base Cost of Energy**

Docket No. E017/MR-15-1034

**OTTER TAIL POWER COMPANY'S
REPLY COMMENTS**

I. INTRODUCTION

These Reply Comments respond to Comments filed by the Department of Commerce, Division of Energy Resources (Department) on March 7, 2016 in the above-captioned matter. In its Comments, the Department requested that Otter Tail Power Company (Otter Tail) respond to two items:

(1) Explanation of whether there are any adjustments to the costs reflected in the initial filing for weather normalization and normalizing congestion and loss amounts, as had been reflected in Otter Tail's last Base Cost of Energy filing, Docket No. E017/MR-10-240; and,

(2) Provide a reconciliation of the amounts included in the determination of the proposed base cost of energy amount, to amounts included in Otter Tail's current General Rate Case, Docket No. E017/GR-15-1033. These Reply Comments provide the requested information.

II. PRIOR BASE COST OF ENERGY ADJUSTMENTS

The Department requested in its Comments that Otter Tail confirm whether there were any adjustments included in the forecasted amounts included in the initial filing in this docket for weather normalization, as well as for congestion and losses as previously Ordered by the Minnesota Public Utilities Commission (Commission).

Weather Normalization

In Otter Tail's last General Rate Case, Docket No. E017/GR-10-239, and the associated Base Cost of Energy filing in Docket No. E017/MR-10-240, Otter Tail used a historic test year in

that case. Applying an adjustment to weather normalize data within a historic test year is typical because the impact of weather can be reasonably estimated based on actual weather that occurred during the test year compared to average weather.

In Otter Tail's current Rate Case, Otter Tail is using a forecast test year rather than a historic test year. The Retail kWh Sales as shown in Column B of Attachment 1 in the Initial Filing within this docket, reflect forecasted total company sales for the 2016 Proposed Test Year that were developed using weather normalized data. Because the sales forecast assumes normal weather, and the forecasted energy costs are based on this normalized sales forecast, no normalizing adjustment is required.

Congestion and Losses

In Otter Tail's last Base Cost of Energy filing, Docket No. E017/MR-10-240, an adjustment was made to comply with the Commission's Order¹ to allocate certain congestion and losses amounts for all generation between retail and wholesale, on a megawatt-hour basis. This is an adjustment Otter Tail makes each month within its calculation of the Fuel Clause rate, based on actual information received each month from the Mid-Continent Independent System Operator (MISO). When using historical data, Otter Tail was able to quantify these congestion and loss amounts, and appropriately incorporate them when resetting its base cost of energy amounts, such as Otter Tail did in the last Rate Case, and as it continues to do each month when calculating each month's fuel clause rate.

In the current docket (Docket No. E017/MR-15-1034), as noted earlier, Otter Tail is using a forecasted test year rather than a historic test year. The models used to forecast Otter Tail's costs of energy include estimated costs associated with energy provided from Otter Tail's own generating plants, estimated costs associated with energy acquired under purchased power agreements, and estimated costs to serve remaining energy demands from the day ahead and real time markets within MISO. The congestion and loss-related costs are embedded within these over-all total energy costs and are not split-out separately for forecasting. Otter Tail's current process establishes a reasonable forecast of total energy costs upon which to set the base cost of fuel. As has been done in the past, Otter Tail will continue to make an adjustment for the actual costs of congestion and losses when computing its monthly Fuel Clause Adjustment.

¹ Order Dated August 31, 2009 in Docket E, G999/AA-07-1130

III. RECONCILIATION OF COSTS INCLUDED IN INITIAL FILING TO PROPOSED 2016 TEST YEAR COST OF SERVICE

In Initial Comments, the Department requested Otter Tail provide a reconciliation of the amounts included in the Initial Filing within this docket, to amounts included on Otter Tail's Proposed Test Year Cost of Service Study for 2016 included in its current General Rate Case. Attachment 1 to these Reply Comments provides that reconciliation.

IV. CONCLUSION

As described above, Otter Tail has provided the information requested by the Department and requests the Commission approve Otter Tail's revised Base Cost of Energy.

Dated: March 14, 2016

Respectfully Submitted,

OTTER TAIL POWER COMPANY

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		(A)	(B)	(C)	(D)	(E)	(F)
Line No.	Month	(C)+(D)+(F) Less (E) = Total costs	Retail kWh Sales	Purchased Power	Generation Costs	Less: Intersystem Sales (1)	Net Retail MISO Day 2
1	Jan	\$12,441,606	494,133,827	\$6,801,000	\$5,640,606	\$0	\$0
2	Feb	\$11,315,151	452,643,623	\$6,207,000	\$5,110,328	(\$2,177)	\$0
3	Mar	\$10,435,974	430,535,833	\$5,696,500	\$4,739,474	\$0	\$0
4	Apr	\$9,073,199	377,319,772	\$6,565,600	\$2,507,599	\$0	\$0
5	May	\$8,286,172	347,740,602	\$5,492,500	\$2,793,672	\$0	\$0
6	Jun	\$8,085,211	337,352,803	\$4,072,200	\$4,097,686	(\$84,675)	\$0
7	Jul	\$9,542,369	366,117,619	\$4,552,000	\$5,022,155	(\$31,786)	\$0
8	Aug	\$10,187,608	391,930,573	\$4,787,600	\$5,402,322	(\$2,314)	\$0
9	Sep	\$9,346,466	388,101,597	\$5,337,200	\$4,059,204	(\$49,938)	\$0
10	Oct	\$9,168,145	397,160,864	\$5,794,000	\$3,374,145	\$0	\$0
11	Nov	\$10,971,044	454,827,928	\$5,845,200	\$5,139,784	(\$13,940)	\$0
12	Dec	\$12,894,725	503,230,771	\$7,455,300	\$5,441,738	(\$2,313)	\$0
13	Total as originally filed	\$121,747,670	4,941,095,811	\$68,606,100	\$53,328,713	(\$187,143)	\$0

19 New Proposed Base Cost per kWh = (A)/(B), Line 16 **\$0.024640**
 20 Base Cost Ordered in Docket No. E017/MR-10-240 0.023163
 21 Difference - change from originally proposed base 0.001477

	(A)	(B)	(C)	(D)	(E)	(F)	(G)
Reconciliation to Cost of Service Study Page 9-1 (COSS included in Volume 4A, Work Papers page 9 in Docket No. E017/GR-15-1033)							
	PROD EXPENSES EXCL PURCHASED POWER	Test Year COSS	Final Test Year COSS	MN Basis	Allocation %	Allocator	
1	BASE DEMAND	16,499,583	16,499,583	9,008,356	0.545974756	E1	
2	PEAK DEMAND	7,057,725	7,057,725	3,574,939	0.506528488	D1	
3	BASE ENERGY	67,194,176	67,194,176	35,612,734	0.529997334	E2	
4	PEAK ENERGY	454,100	454,100	230,015	0.506528488	D1	
		91,205,584	-	91,205,584	48,426,044	0.530954807	calc only
	PURCHASED POWER						
5	BASE DEMAND	1,954,041	1,954,041	1,066,857	0.545974756	E1	
6	PEAK DEMAND	0	-	-	-	-	-
7	BASE ENERGY	70,881,661	70,881,661	37,567,091	0.529997334	E2	
8	PEAK ENERGY	0	0	0	0	0	0
9	Energy - Lines 3 + 4+ 7	138,529,937	-	138,529,937	73,409,840	0.529920403	calc only
10	Non-eligible fuel expenses included in budgeted purchased energy	2,275,561	2,275,561	-	-	-	-
11	Non-eligible fuel expenses classified as part of base energy (accounts 512, 513, 514, 544, 545 and fuel not burned in 501)	14,506,707	-	14,506,707	7,688,516	0.529997334	E2
12		121,747,669	-	121,747,669	65,721,324	0.539815871	calc only
13	Fuel only cost of asset-based transactions	-	-	-	-	-	-
14		-	-	-	-	-	-
15	Total	121,747,669	-	121,747,669	65,721,324	0.539815871	calc only
16	Difference (2)	(1)	1	121,747,670	0	0.529997334	E2
17		121,747,670	-	-	65,721,324	-	-
18							

CERTIFICATE OF SERVICE

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval
of a New Base Cost of Energy
Docket No. E017/MR-15-1034**

I, Jana C. Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to the Office of Attorney General – Antitrust & Utilities Division 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 14th day of March, 2016

/s/ JANA C. HRDLICKA
Jana C. Hrdlicka
Regulatory Filing Coordinator
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(218) 739-8879

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