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November 1, 2017



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 Otter Tail Power Company's Petition for Approval of the Company's proposed LED Street and Area Lighting rate schedule 11.07 and associated LED implementation plan.
Docket No. E017/M-17-152
Supplemental Comments - Rate Schedule**

Dear Mr. Wolf:

Otter Tail is filing an update to its earlier proposed LED Street and Area Lighting rate schedule 11.07. The updated rates contained in the proposed LED 11.07 rate schedule, shown in Attachment 1, are revenue neutral to Otter Tail's existing Outdoor Lighting 11.04 rate schedule's rates. The existing 11.04 rate schedule was approved by the Minnesota Public Utilities Commission (PUC) in Otter Tail's recent general rate case, Docket No. E017/GR-15-1033, with an effective date of November 1, 2017. Otter Tail has included Attachment 3 which shows the approved revenue from the existing rates and the revenue neutral proposed LED rates. Both rate schedules reflect the annual recovery of the PUC approved \$2,714,588.

Otter Tail has also included Attachment 2, which proposes to close the existing Outdoor Lighting 11.04 rate schedule to new installations. Both a redline and clean version have been included in Attachment 2. If approved, any new lighting request from a customer would require Otter Tail to install an energy efficient LED fixture instead of the existing lighting options.

Otter Tail has included a December 1, 2017 effective date on both proposed rate schedules, with the expectation to update this date upon the PUC's decision in this docket.

Daniel P. Wolf
November 1, 2017
Page 2

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8639 or at jgrenier@otpc.com.

Sincerely,

/S/ JASON A. GRENIER
Jason A. Grenier
Manager, Market Planning

jch
Enclosures
By electronic filing
c: Service List

Attachment 1
MN 11.07 LED Street and Area Lighting



Fergus Falls, Minnesota

LED STREET and AREA LIGHTING – DUSK TO DAWN

DESCRIPTION	RATE CODE
LED Outdoor Lighting	32-730
LED Flood Lighting	32-732
Aluminum Alloy Poles	32-734
LED Flood Visor	32-735

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this service.

APPLICATION OF SCHEDULE: This schedule is applicable to any Customer for automatically operated dusk to dawn outdoor lighting supplied and operated by the Company.

RATE:

LED TYPE	Approximate Lumens	Approximate Wattage	Monthly Charge
LED5	5175	47	\$9.39
LED8	9003	76	\$17.62
LED3PT	2759	26	\$11.30
LED5PT	5404	47	\$14.53
LED10	12388	95	\$18.91
LED13	16691	133	\$23.68
LED20 - Flood	23067	199	\$23.67
LED30 - Flood	32003	261	\$44.21

Appropriate standard wood pole is included in the Monthly Charge

ALUMINUM ALLOY POLES	Additional Monthly Charge
STANDARDS 30'	\$11.67
STANDARDS 40'	\$10.87

LED FLOOD VISOR	Additional Monthly Charge
Lighting Visor LED 20-Flood	\$0.76
Lighting Visor LED 30-Flood	\$1.38



Fergus Falls, Minnesota

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this rate schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

N
N
N
N

SEASONAL CUSTOMERS: Seasonal Customers will be billed at the same rate as year-around Customers, except as follows:

N
N

A fixed charge of \$32.79 will be billed each Seasonal Customer once per season per fixture in addition to the rate provided above. The fixed charge will be included in the first bill rendered for each season.

N
N
N

Each Seasonal Customer will be billed for the number of months each season that the outdoor lighting fixture is in use, but not less than a minimum of four months, plus the seasonal fixed charge.

N
N
N

UNDERGROUND SERVICE: If the Customer requests underground service to any outdoor lighting unit, the Company will supply up to 200 feet of wire and add an additional \$2.52 to the monthly rate specified above. If overhead service is not available, there is no additional charge. There is no additional charge for LED5PT or LED3PT fixtures, or fixtures mounted on Aluminum Alloy Standards.

N
N
N
N
N

EQUIPMENT AND OVERHEAD SERVICE SUPPLIED BY THE COMPANY: The light shall be mounted on a suitable new or existing Company-owned pole. Any extension beyond an average installation length of 150' will be at the expense of the Customer.

N
N
N

The Company will install, own and operate, and have discretion to replace or upgrade a high intensity discharge light including suitable reflector or a flood light including a lamp, or a bracket for mounting on wood poles with overhead wiring and photo-electric or other device to control operating hours. Customers provided with pole top fixtures on fiberglass poles and fixtures mounted on Aluminum Alloy Standards will not receive overhead power supply. The light shall operate from dusk to dawn. The Company will supply the necessary electricity and maintenance for the unit.

N
N
N
N
N
N
N

SERVICE CONDITIONS: Lighting will not be mounted on Customer-owned property. The light shall be mounted upon a suitable new or existing Company-owned facility. The Company shall own, operate, and maintain the lighting unit including the pole, fixture, lamp, ballast, photoelectric control, mounting brackets, fixture arrester, LED driver and all necessary wiring using the Company's standard street lighting equipment. The Company shall furnish all electric Energy required for operation of the unit.

N
N
N
N
N
N



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
Section 11.07
ELECTRIC RATE SCHEDULE
LED Street and Area Lighting
Dusk to Dawn
Page 3 of 3
Original

In cases of vandalism or damages, the Company has the discretion to discontinue service and remove Company equipment.

N
N

Attachment 2
Redline and Clean Versions of
MN 11.04 Outdoor Lighting - Electric Rate Schedules



Fergus Falls, Minnesota

OUTDOOR LIGHTING DUSK TO DAWN

DESCRIPTION	RATE CODE
Outdoor Lighting – <u>CLOSED TO NEW INSTALLATIONS</u>	32-745
Floodlighting – <u>CLOSED TO NEW INSTALLATIONS</u>	32-746

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this service.

APPLICATION OF SCHEDULE: This schedule is applicable to any Customer for automatically operated dusk to dawn outdoor lighting supplied and operated by the Company.

RATE:

<u>Unit type</u>	<u>Lumens</u>	<u>Wattage</u>	<u>Monthly Charge</u>
MV-6*	6000	175	\$8.44
MV-6PT*	6000	175	\$11.02
MV-11*	11000	250	\$15.78
MV-21*	21000	400	\$20.41
MV-35*	35000	750	\$30.75
MV-55*	55000	1000	\$42.24
MH-8	8500	100	\$9.60
MH-8PT	8500	100	\$13.65
MH-14	14000	175	\$18.29
MH-20	20500	250	\$20.88
MH-36	36000	400	\$20.49
MH-110	110000	1000	\$43.74
HPS-9	9000	100	\$9.39
HPS-9PT	9000	100	\$11.34
HPS-14	14000	150	\$14.56
HPS-14PT	14000	150	\$14.54
HPS-19	19000	200	\$16.87
HPS-23	23000	250	\$19.05
HPS-44	44000	400	\$23.61



Fergus Falls, Minnesota

<u>Fixture</u>		<u>Unit Type</u>	<u>Monthly Charge</u>
400	MV-Flood*	Mercury Vapor	\$20.41
400	MA-Flood	Metal Additive	\$23.94
400	HPS-Flood	High Pressure Sodium	\$23.61
1000	MV-Flood*	Mercury Vapor	\$40.13
1000	MA-Flood	Metal Additive	\$44.36

*Due to the U.S. Government Energy Act of 2005, after August 1, 2008, the Company will no longer install Mercury Vapor fixtures for new installations.

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this rate schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

SEASONAL CUSTOMERS: Seasonal Customers will be billed at the same rate as year-around Customers, except as follows:

A fixed charge of \$32.79 will be billed each Seasonal Customer once per season per fixture in addition to the rate provided above. The fixed charge will be included in the first bill rendered for each season.

Each Seasonal Customer will be billed for the number of months each season that the outdoor lighting fixture is in use, but not less than a minimum of four months, plus the seasonal fixed charge.

UNDERGROUND SERVICE: If the Customer requests underground service to any outdoor lighting unit, the Company will supply up to 200 feet of wire and add an additional \$2.52 to the monthly rate specified above. If overhead service is not available, there is no additional charge. **There is no additional charge for the MV-6 PT*, HPS-9 PT or the HPS-14 PT fixtures.**



Fergus Falls, Minnesota

EQUIPMENT AND OVERHEAD SERVICE SUPPLIED BY THE COMPANY: The light shall be mounted on a suitable new or existing Company-owned pole. Any extension beyond one span of wire will be at the expense of the Customer.

The Company will install, own and operate, and have discretion to replace or upgrade a high intensity discharge light including suitable reflector or a floodlight including a lamp, bracket for mounting on wood poles with overhead wiring and photo-electric or other device to control operating hours. Customers provided with pole top fixtures on fiberglass poles will not receive overhead power supply. The light shall operate from dusk to dawn. The Company will supply the necessary electricity and maintenance for the unit.

SERVICE CONDITIONS: Lighting will not be mounted on Customer-owned property. The light shall be mounted upon a suitable new or existing Company-owned facility. The Company shall own, operate, and maintain the lighting unit including the pole, fixture, lamp, ballast, photoelectric control, mounting brackets, and all necessary wiring using the Company's standard street lighting equipment. The Company shall furnish all electric Energy required for operation of the unit.

In cases of vandalism or damages, the Company has the discretion to discontinue service and remove Company equipment.



Fergus Falls, Minnesota

**OUTDOOR LIGHTING
DUSK TO DAWN**

DESCRIPTION	RATE CODE
Outdoor Lighting – CLOSED TO NEW INSTALLATIONS	32-745
Floodlighting – CLOSED TO NEW INSTALLATIONS	32-746

C

C

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HPS-19	19000	200	\$16.87
HPS-23	23000	250	\$19.05
HPS-44	44000	400	\$23.61



Fergus Falls, Minnesota

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400	HPS-Flood	High Pressure Sodium	\$23.61
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Fergus Falls, Minnesota

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In cases of vandalism or damages, the Company has the discretion to discontinue service and remove Company equipment.

New & Existing Light Type	Annual Bill Quantity	Rate Case Rate Approved	Rate Case Revenue Approved	LED Proposed Weighted Monthly Rate	LED Proposed Revenue tied to Rate Case Revenue Requirement
LED10	5,415			\$ 18.91	\$ 102,389
HPS23	4,879	\$ 19.05	\$ 92,939		
MH20	79	\$ 20.88	\$ 1,658		
MV11	347	\$ 15.78	\$ 5,480		
MV21	109	\$ 20.41	\$ 2,227		
LED13	1,969		\$ -	\$ 23.68	\$ 46,619
HPS44	1,652	\$ 23.61	\$ 39,007		
MH110	34	\$ 43.74	\$ 1,495		
MH36	270	\$ 20.49	\$ 5,527		
MV35	-	\$ 30.75	\$ -		
MV55	13	\$ 42.24	\$ 534		
LED20FLOOD	18,493			\$ 23.67	\$ 437,737
400 MV	49	\$ 20.41	\$ 1,000		
SIGN	203	\$ 18.32	\$ 3,713		
SIGN @4.50	23	\$ 5.35	\$ 125		
400 HPS	10,594	\$ 23.61	\$ 250,130		
400 MA	7,624	\$ 23.94	\$ 182,519		
LED30FLOOD	3,287			\$ 44.21	\$ 145,305
1M-HPSF	13	\$ 44.36	\$ 578		
1M-MAF	98	\$ 46.88	\$ 4,614		
4CHPSF	25	\$ 26.13	\$ 661		
1000-MV	75	\$ 40.13	\$ 3,013		
1000-MA	3,075	\$ 44.36	\$ 136,401		
LED3PT	4,446			\$ 11.30	\$ 50,242
HPS9PT	3,777	\$ 11.34	\$ 42,829		
MV6PT	669	\$ 11.02	\$ 7,376		
LED5	195,961			\$ 9.39	\$ 1,840,073
HPS14	6,603	\$ 14.56	\$ 96,147		
HPS9	151,760	\$ 9.39	\$ 1,425,023		
MH8	4,632	\$ 9.60	\$ 44,463		
MV6	32,966	\$ 8.44	\$ 278,209		
LED5PT	624			\$ 14.53	\$ 9,063
HPS14PT	600	\$ 14.54	\$ 8,723		
MH8PT	24	\$ 13.65	\$ 325		
LED8	4,388			\$ 17.62	\$ 77,308
HPS19	4,388	\$ 16.87	\$ 74,017		
MH14	-	\$ 18.29	\$ -		
	234,582				
Total Non-Underground Revenue			\$ 2,708,735		\$ 2,708,735
UNDERGROUND QUANTITIES	200.25	\$2.52	\$ 6,052	\$ 2.52	\$ 6,052
UNDERGROUND Adjustment			\$ (199)		\$ (199)
Schedule E-1, Docket No. GR-15-1033, 11.04 Outdoor Lighting, Commission Approved Revenue Requirement (Rates 745 & 746)			\$ 2,714,588		\$ 2,714,588

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Company's proposed LED Street and Area Lighting rate schedule 11.07 and associated LED implementation plan
Docket No. E017/M-17-152**

I, Jana 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 all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Supplemental Comments**

Dated this **1st** day of **November, 2017**.

/s/ JANA HRDLICKA

Jana Hrdlicka, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8879

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_17-152_M-17-152
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_17-152_M-17-152
Ian	Dobson	Residential.Utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_17-152_M-17-152
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_17-152_M-17-152
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_17-152_M-17-152
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Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_17-152_M-17-152
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_17-152_M-17-152

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_17-152_M-17-152
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_17-152_M-17-152
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-152_M-17-152
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_17-152_M-17-152
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_17-152_M-17-152