215 South Cascade Street PO Box 496 Fergus Falls, Minnesota 56538-0496 218 739-8200 www.otpco.com (web site)

October 13, 2016



The Honorable Eric L. Lipman Administrative Law Judge State of Minnesota Office of Administrative Hearings 600 North Robert Street P.O. Box 64620 St. Paul, MN 55164-0620

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota OAH Docket No. 8-2500-33355
MPUC Docket No. E017/GR-15-1033
LGS Rate Design Agreement

Dear Judge Lipman:

Otter Tail Power Company respectfully submits the attached Agreement regarding rate design for the Large General Service customer class reached with the Chamber of Commerce. Both Public and Trade Secret versions of this Agreement are included.

Please contact me at (218) 739-8475, or <u>bgerhardson@otpco.com</u> should you have any questions with respect to this Agreement.

Regards,

/s/ BRUCE GERHARDSON
Bruce Gerhardson
Associate General Counsel

jch Enclosures By electronic filing c: Service List



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as Schedule 3.

3 Otter Tail Power Company (OTP or the Company) and the Minnesota Chamber of 4 Commerce (the Chamber) have reached an agreement regarding the rate design for OTP's Large 5 General Service (LGS) class in OTP's pending Minnesota Rate Case. The elements of the 6 agreed upon LGS class rate design are detailed in Schedule 1 (Revised E-Schedules) and 7 Schedule 2 (Revised Comparisons of Current and Proposed LGS Rates and Marginal Costs). A 8 bill impact analysis for both LGS-Time of Day and LGS-Non Time of Day customers is included 9

The agreed upon rate design is largely based on the Chamber's recommended LGS class rate design, as described in the Direct and Surrebuttal Testimony of Chamber Witness Ms. Kavita Maini. The agreed upon rates move rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group. The agreement is therefore also consistent with OTP's overall rate design goals.² Finally, the Agreement maintains the relationship between LGS-Time of Day energy rates and Standby Service energy rates.

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Page 2 of Schedule 3 (NON PUBLIC) shows the bill impacts for the LGS-Time of Day rate class. There are only 26 customers on this rate. In order to protect the privacy of these customers' OTP and the Chamber have treated page 2 of Schedule 3 as "Protected Data" because it derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the "Protected Data"). The Protected Data is therefore "trade secret information" and "nonpublic data" under Minn. Stat. § 13.37.

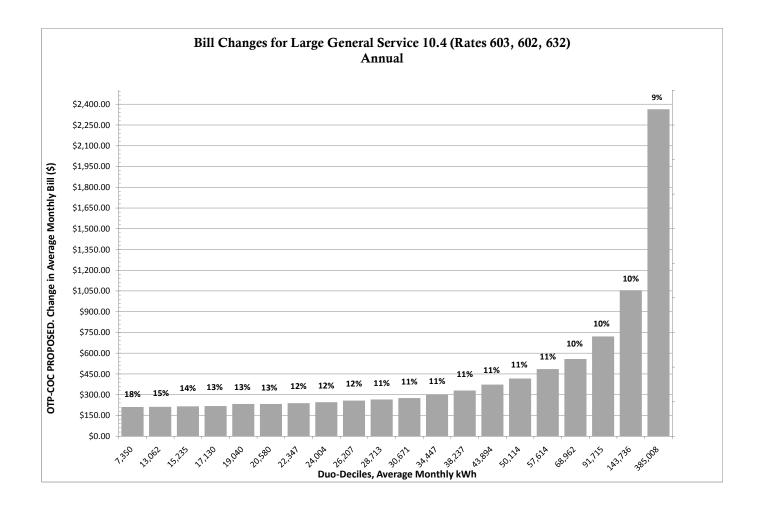
Maini Surrebuttal, p.30, Table 5.
 Prazak Direct, p. 4; Prazak Rebuttal, p.27, Table 4.

Proposed Test Year 2016 Operating Revenue Summary Comparison - By Rate Schedule

Line	Deta C. 1 - 3 1		Operating	Re	Revenues):ee		
No.	Rate Schedule		Present		Proposed	L	Difference	Percent Change	
1	9.01 Residential Service (Rate 101)	\$	44,024,705	\$	48,938,424	\$	4,913,719	11.2%	
2	9.02 Residential Demand Control (Rate 241)	\$	4,531,949	\$	5,202,245	\$	670,296	14.8%	
3	Total Residential:	\$	48,556,654	\$	54,140,669	\$	5,584,015	11.5%	
4									
5	9.03 Farm Service (Rate 361)	\$	3,136,239	\$	3,418,501	_	282,262	9.0%	
6	Total Farm:	\$	3,136,239	\$	3,418,501	\$	282,262	9.0%	
7									
8	10.01 Small General Service - Under 20 kW - Metered Service Secondary (Rate 404)	\$	9,772,258		10,523,752		751,495	7.7%	
9	10.01 Small General Service - Under 20 kW - Metered Service Primary (Rate 405)	\$	4,931		5,686		755	15.3%	
10	10.01 Small General Service - Under 20 kW - Non-metered Service - 1,000 Watts and Under (Rate 408)	\$	55,386		56,435		1,049	1.9%	
11	10.02 General Service - 20 kW or Greater - Secondary Service (Rate 401)	\$	19,011,869		20,524,803		1,512,934	8.0%	
12	10.02 General Service - 20 kW or Greater - Primary Service (Rate 403)	\$	284,526		315,228		30,702	10.8%	
13	10.03 General Service - Time of Use (Commercial TOU) - (Rates 708, 709, 710)	\$	2,272,531	\$	2,801,268		528,737	23.3%	
14	Total General Service:	3	31,401,501	\$	34,227,171	\$	2,825,670	9.0%	
15 16	10.04 Larga Canaral Sarvica Sacondary Sarvica (Pata 602)	\$	25 119 017	¢	27,917,295	¢	2,798,378	11.1%	
16 17	10.04 Large General Service - Secondary Service (Rate 603) 10.04 Large General Service - Primary Service (Rate 602)	\$	25,118,917 3,606,952		3,917,887		310,935	11.1% 8.6%	
18	10.04 Large General Service - Primary Service (Rate 602)	\$	291,492	\$	284,514		(6,978)	-2.4%	
19	10.04 Large General Service - Transmission Service (Rate 632) 10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$	9,335,529	\$	10,290,955		955,426	10.2%	
20	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 613, 613) 10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$	13,650,461	\$	15,209,309		1,558,848	11.4%	
21	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$	46,483,316		49,730,508		3,247,192	7.0%	
22	Total Large General Service:	_	98,486,668		107,350,468	\$	8,863,800	9.0%	
23	Total Large General Service.	φ	20,400,000	φ	107,330,400	φ	8,803,800	9.070	
24	11.02 Irrigation Service - Option 1: Non-Time-of-Use (Rate 703)	\$	98,871	\$	118,864	\$	19,993	20.2%	
25	11.02 Irrigation Service - Option 2 (Rates 704, 705, 706)	\$	302,245		358,465		56,220	18.6%	
26	Total Irrigation:		401,116	\$	477,328	\$	76,212	19.0%	
27		Ψ	101,110	Ψ	177,520	Ψ	70,212	17.070	
28	11.03 Outdoor Lighting - Metered - Energy Only (Rate 748)	\$	208,245	\$	230,122	\$	21,877	10.5%	
29	11.03 Outdoor Lighting - Non-Metered - Energy Only (Rate 749)	\$	182,533		200,916		18,383	10.1%	
30	11.04 Outdoor Lighting - Street & Area Lighting (Rate 745)	\$	1,911,510		2,200,940		289,431	15.1%	
31	11.04 Outdoor Lighting - Flood Lighting (Rate 746)	\$	544,890	\$	585,333	\$	40,444	7.4%	
32	Total Lighting:	\$	2,847,178	\$	3,217,311	\$	370,133	13.0%	
33	•								
34	11.05 Municipal Pumping - Secondary Service (Rate 871)	\$	1,571,230	\$	1,775,517	\$	204,287	13.0%	
35	11.06 Civil Defense - Fire Sirens (Rate 843)	\$	4,680	\$	5,262	\$	582	12.4%	
36	Total Other Public Authority:	\$	1,575,910	\$	1,780,779	\$	204,869	13.0%	
37									
38	14.01 Water Heating - Controlled Service (Rate 191)	\$	1,639,361	\$	1,827,887	\$	188,526	11.5%	
39	Total Water Heating:	\$	1,639,361	\$	1,827,887	\$	188,526	11.5%	
40									
41	14.04 Controlled Service - Interruptible Load Rider CT Metering (Rates 170, 165, 881, 168, 268, 169, 269)	\$	1,732,262	\$	1,928,336	\$	196,074	11.8%	
42	14.05 Controlled Service - Interruptible Load Rider Self-Contained Metering (Rates 190, 185, 882)	\$	5,429,881	\$	6,057,453	\$	627,572	11.6%	
43	Total Interruptible:	\$	7,162,143	\$	7,985,789	\$	823,646	11.5%	
44				_					
45	14.06 Controlled Service - Deferred Load Rider (Rates 197, 195, 883)	\$	997,335		1,109,576		112,242	11.3%	
46	14.07 Fixed Time of Service Rider - Self-Contained Metering (Rates 301, 884)	\$	329,429	\$	311,630	\$	(17,799)	-5.4%	
47	14.07 Fixed Time of Service Rider - CT Metering (Rates 302, 885)	\$	283,626		265,676		(17,950)	-6.3%	
48	Total Deferred Load:	\$	1,610,389	\$	1,686,883	\$	76,493	4.7%	
49	<u>.</u>								
50	TOTAL REVENUE:	\$	196,817,160	\$	216,112,786	\$	19,295,626	9.8%	
					· · · · · · · · · · · · · · · · · · ·				

LARGE GENERAL SERVICE	Section 10.04		Forecasted Revenue	Proposed Revenue	Increase		
			\$ 29,017,361	\$ 32,119,696	10.69%		
	Customer Charge per month	Minimum Bill per month	Facilities Charge per annual max. kW (minimum 80 kw) per month	Energy Charge p		Demand per	kW
SECONDARY 603 Current Rate	\$40.00	Cust+Fac+Demand		Summer	Winter	Summer	winter
Current Rate	ф 4 0.00	< 1000 kW: > 1000 kW:	\$0.33 \$0.24	\$0.04618	\$ \$0.05000	\$7.22	\$6.07
Proposed - Secondary	\$80.00	Cust+Fac+Demand	* 0.55	\$0.05429	\$0.05693	\$12.00	\$9.00
		< 1000 kW: > 1000 kW:	\$0.55 \$0.45				
Marginal Costs	\$242.24	< 1000 kW: > 1000 kW:	***	\$0.03040	\$0.03188	\$20.92	\$9.95
PRIMARY 602				Summer	Winter	Summer	Winter
Current Rate	\$40.00	Cust+Fac+Demand	\$0.12	\$0.04477	\$0.04821	\$6.93	\$5.76
Proposed - Primary	\$80.00	Cust+Fac+Demand	\$0.25	\$0.05234	\$0.05444	\$11.46	\$8.52
Marginal Costs	\$304.33		\$0.48	\$0.02938	\$ \$0.03056	\$20.11	\$9.47
<u> </u>				0	W		14/1
TRANSMISSION 632 Current Rate	\$40.00	Cust+Fac+Demand	\$0.00	\$0.04244	Winter \$0.04533	\$5.37	Winter \$4.97
Proposed - Transmission	\$80.00	Cust+Fac+Demand	\$0.00	\$0.04473	\$0.04594	\$7.98	\$7.85
	\$304.33		\$0.00		\$0.02849	\$14.00	\$8.72

LARGE GENERAL	L SERVICE - TIM	E OF DAY	Section	n 10.05					Target Revenue							
Customer #	Cust. Charge per month	Monthly Min. Bill per month	Facilities Charge per annual max. kW (min. 80)		PK 611	Summer SH 615		rgy Charge per kWh PK 611	\$75,230,772 Winter SH 615	7.94% OP 613	PK 611	Summer SH 615	per k		Winter SH 615	OP 613
Current Rate	\$60.00	Cust. + Facilities	\$0.33	< 1,000 kW	\$0.07319	\$0.05397	\$0.02437	\$0.06507	\$0.04917	\$0.03665	\$5.54	\$1.68	\$0.00	\$5.13	\$0.94	\$0.00
Current Nate	φου.σσ	Odot. 1 1 dointico	\$0.24	>=1,000 kW	ψ0.07010	ψ0.00007	ψ0.02-107	ψ0.00007	ψ0.0-1017	ψο.οοσσο	ψ0.04	ψ1.00	ψ0.00	ψ0.10	ψ0.04	Ψ0.00
Rate 1	\$120.00	Cust. + Facilities	\$0.55	< 1,000 kW	\$0.08355	\$0.06355	\$0.03198	\$0.06970	\$0.06409	\$0.03824	\$12.85	\$2.14	\$0.00	\$10.25	\$2.15	\$0.00
	·		\$0.45	>=1,000 kW					·			·				
Marginal Costs	\$242.24		\$0.75 \$0.57		\$0.04875	\$0.03708	\$0.02090	\$0.04067	\$0.03740	\$0.02499	\$18.17	\$2.67	\$0.08	\$6.94	\$2.69	\$0.32
PRIMARY					PK 610	SH 614	OP 612	PK 610	SH 614	OP 612	PK 610	SH 614	OP 612	PK 610	SH 614	OP 612
Current Rate	\$60.00	Cust. + Facilities	\$0.12		\$0.07067	\$0.05228	\$0.02376	\$0.06251	\$0.04742	\$0.03546	\$5.32	\$1.61	\$0.00	\$4.94	\$0.82	\$0.00
Rate 1	\$120.00	Cust. + Facilities	\$0.25		\$0.09367	\$0.07147	\$0.04047	\$0.07752	\$0.07149	\$0.04795	\$7.86	\$2.15	\$0.00	\$4.96	\$2.05	\$0.00
Marginal Costs	\$304.33		\$0.48		\$0.04693	\$0.03581	\$0.02028	\$0.03884	\$0.03582	\$0.02402	\$17.47	\$2.56	\$0.08	\$6.61	\$2.56	\$0.30
TRANSMISSION					PK 639	SH 637	OP 640	PK 639	SH 637	OP 640	PK 639	SH 637	OP 640	PK 639	SH 637	OP 640
Current Rate	\$60.00	Cust. + Facilities	\$0.00		\$0.06660	\$0.04952	\$0.02272	\$0.05844	\$0.04460	\$0.03352	\$4.31	\$1.06	\$0.00	\$4.27	\$0.70	\$0.00
Rate 1	\$120.00	Cust. + Facilities	\$0.00		\$0.07840	\$0.06012	\$0.03429	\$0.06407	\$0.05937	\$0.04005	\$7.07	\$1.72	\$0.00	\$4.87	\$1.88	\$0.00
Marginal Costs	\$304.33	Assumed	to be owned b	v customer.	\$0.04403	\$0.03376	\$0.01926	\$0.0360	\$0.0333	\$0.0225	\$11.79	\$2.15	\$0.07	\$6.09	\$2.35	\$0.27



Docket No. E017/GR-15-1033
OAH Docket No. 8-2500-33355
Schedule 3 to OTP and COC LGS Agreement
PUBLIC DOCUMENT - NOT PUBLIC (OR PRIVELEGED) DATA HAS BEEN EXCISED
Page 2 of 2

[PROTECTED DATA BEGINS...

Bill Changes for Large General Service Time-of-Day (Rates 611-610-639, 615-614- Annual	-637, 613-612-640)

...PROTECTED DATA ENDS]

CERTIFICATE OF SERVICE

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota Docket No. E017/GR-15-1033

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 the Office of Attorney General — Antitrust & Utilities Division and all other persons on the attached service list by electronic service or by First Class mail or by personal service.

Otter Tail Power Company LGS Rate Design Agreement

Dated this 13th day of October 2016.

/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
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-1033_Official CC Service List
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-1033_Official CC Service List
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street Nor St. Paul, MN 55101	Electronic Service th	No	OFF_SL_15-1033_Official CC Service List
Thomas R	Brause	tbrause@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_15-1033_Official CC Service List
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Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-1033_Official CC Service List

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Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_15-1033_Official CC Service List
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David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380496	Electronic Service treet	No	OFF_SL_15-1033_Official CC Service List
Rate Case Inbox	Rate Case Inbox	mnratecase@otpco.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_15-1033_Official CC Service List
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Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official CC Service List
Robert H.	Schulte	rhs@schulteassociates.co m	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_15-1033_Official CC Service List
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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_15-1033_Official CC Service List
Patrick	Zomer	Patrick.Zomer@lawmoss.c om	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-1033_Official CC Service List