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March 30, 2018



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

**RE: In the Matter of the Application of Otter Tail Power Company for
Authority to Increase Rates for Electric Service in Minnesota
Docket No. E017/GR-15-1033
Joint Request to Reopen Order Approving Compliance Filing**

Dear Mr. Wolf:

By the enclosed filing, Otter Tail Power Company (Otter Tail) and the Minnesota Chamber of Commerce (Chamber) jointly request the Commission to reopen its October 30, 2017 Order Approving Compliance Filing and Provisionally Approving Transmission Cost Recovery Rate Rider Rate.

Otter Tail and the Chamber seek to correct certain Large General Service (LGS) rate elements so they: (1) conform to the intent and principles of the October 31, 2016 Large General Service Class Rate Design Agreement between Otter Tail and the Chamber; and (2) avoid unintended and unreasonable rate increases that incorrectly incentivize certain members of the LGS class to migrate away from Time of Day (TOD) service to non-TOD service and to change voltage levels. This correction will not change Otter Tail's overall revenues or LGS class revenues from the levels previously approved by the Commission.

Please contact me at (218) 739-8956, or cstephenson@otpc.com, should you have any questions with respect to this filing.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

jch
Enclosures
c: Service List
By electronic filing

An Equal Opportunity Employer

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

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

**JOINT REQUEST OF OTTER TAIL POWER COMPANY AND MINNESOTA CHAMBER OF COMMERCE
TO REOPEN OCTOBER 30, 2017 ORDER APPROVING COMPLIANCE FILING**

Otter Tail Power Company (Otter Tail) and the Minnesota Chamber of Commerce (the Chamber) respectfully request the Commission reopen its October 30, 2017 Order Approving Compliance Filing and Provisionally Approving Transmission Cost Recovery Rate Rider Rate (the Compliance Order).¹ This request is made in order to correct certain Large General Service (LGS) rate elements so they: (1) conform to the intent and principles of the October 31, 2016 Large General Service Class Rate Design Agreement (LGS Rate Design Agreement) between Otter Tail and the Chamber; and (2) avoid unintended and unreasonable rate increases that incorrectly incentivize certain members of the LGS class to migrate away from Time of Day (TOD) service to non-TOD service and to change voltage levels. The LGS Rate Design Agreement was not contested during Otter Tail’s rate case.

The revisions to the LGS rate elements proposed in this request are needed to correct unanticipated and unidentified effects that arose from incorporating the final-approved sales and revenues into the LGS rates as part of Otter Tail’s August 21, 2017 Compliance Filing (the

¹ See Minn. Stat. § 216B.25 (“The commission may at any time ... rescind, alter, or amend any order fixing rates....”).

Compliance Filing). The proposed revisions do not affect members of other rate classes.

Importantly, this correction will not change Otter Tail's overall revenues or LGS class revenues from the levels approved by the Commission.²

The rates approved in the Compliance Order for the LGS class have resulted in significant and unintended bill increases for certain LGS customers that provide unintended and inappropriate signals for LGS customers to migrate away from TOD service and to change voltage levels. These signals are directly contrary to the intent and principles of the LGS Rate Design Agreement and to rate design fundamentals.

Otter Tail and the Chamber respectfully request the Commission reopen the Compliance Order and approve revised LGS rates so as to: (1) avoid the unintended bill increases for some LGS customers; and (2) align the LGS rate design with the principles of the LGS Rate Design Agreement and rate design fundamentals.

I. COMPLIANCE FILING LGS RATES

On August 21, 2017, Otter Tail submitted its Compliance Filing consistent with the Commission's Rate Case Order and the Reconsideration Order. The Rate Case Order and the Reconsideration Order resulted in 2016 Test Year revenues of \$206.6 million, with \$103.3 million of revenue provided by the LGS class. These revenues were based on the Department's sales figures.³

The Compliance Filing LGS rates were intended to reflect the decisions made in the Rate Case Order, the Reconsideration Order and the LGS Rate Design Agreement. The LGS rates were

² Otter Tail's overall (\$206.6 million) and LGS class (\$103.3 million) revenues were the result of the Commission's May 1, 2017 Findings of Fact, Conclusions, and Order (the Rate Case Order) and July 21, 2017 Order Granting Reconsideration in Part and Denying in Part (the Reconsideration Order). These revenues were detailed in Schedule 2 and Attachment 2A of Otter Tail's August 21, 2017 Compliance Filing.

³ Rate Case Order at Order Point 28.

developed using a two-step process: (1) allocating the LGS class revenues to the different LGS rate classes (known as intraclass revenue allocation) [using the intraclass revenue responsibilities in the LGS Rate Design Agreement];⁴ and (2) designing individual rate elements. The individual rate elements were intended “to move rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group,” as provided in the LGS Rate Design Agreement.⁵ The intraclass revenue allocation and individual rate elements were detailed in the Compliance Filing and approved in the Compliance Order.

II. CUSTOMER IMPACTS

Otter Tail implemented final rates on November 1, 2017. Consistent with Otter Tail’s standard practice, Otter Tail customer account representatives met with LGS customers to review the new rates and assess different service options. In doing so, Otter Tail learned that the new LGS rates were providing inappropriate price signals that, if left unaddressed, would incorrectly incentivize customers to migrate away from TOD service⁶ and to change voltage levels.⁷ Maintaining and strengthening appropriate price signals and moving rates closer to marginal costs were key components of the LGS Rate Design Agreement.⁸ Further, some LGS customers

⁴ Otter Tail addressed the first step by applying the proposed LGS rate class revenue responsibilities identified in Schedule 1 to the LGS Rate Design Agreement to the overall LGS class revenue of \$103.3 million. For example, under the LGS Rate Design Agreement, Large General Service – Secondary Service rate class was responsible for 26.01% of total LGS class proposed revenue (\$27,917,295 / \$107,350,468). The final ordered LGS class proposed revenue was \$103,257,449. The rates for the Large General Service – Secondary Service rate class in the Compliance Filing were designed to result in Large General Service – Secondary Service rate class proposed revenues of \$26,852,874 (\$103,257,449 * 26.01%). This process was repeated for each rate class in the LGS class.

⁵ Ex. 60 at 1 (Large General Service Class Rate Design Agreement).

⁶ Otter Tail’s TOD rates are more granular than the non-TOD rates, providing more detailed price signals to customers about system costs at different times of the day and throughout the year. The TOD price signals are ultimately intended to reduce customer usage during the highest cost hours that drive a large portion of the overall cost of service, thereby saving all customers money. *See* Ex. 57 at 25 (Prazak Rebuttal).

⁷ Otter Tail’s 2016 Marginal Cost Study shows that the marginal costs of secondary service are greater than the marginal costs of primary service, which in turn has higher marginal costs than transmission service. These cost differences are due to losses and because as Otter Tail delivers power deeper into the distribution system, it owns more facilities and therefore has higher marginal costs. *See* Ex. 56 at Schedule 4, p. 16, 33 and 52 (Prazak Direct).

⁸ Ex. 60 at 1 (Large General Service Class Rate Design Agreement) (“The agreed upon rates move rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group.”).

contacted Otter Tail asking about bill increases that were significantly larger than the LGS class overall increase of 5.29%,⁹ providing an additional indication of unintended and counterproductive price signals and consequences associated with the LGS rates.

III. REVISED LGS RATES

In order to resolve these unintended and counterproductive price signals and consequences, Otter Tail and the Chamber request the Commission approve revised LGS rates.¹⁰ The revised LGS rates are: (1) consistent with the purpose of the LGS Rate Design Agreement (*i.e.* “to move rates closer to marginal cost and improve price signals for the LGS-Time of Day rate group”);¹¹ and (2) consistent with marginal costs and cost causation. The revised rates were developed jointly with the Chamber.

Exhibit 1 compares the LGS intraclass revenue allocation from the Compliance Filing to the intraclass revenue allocation associated with the revised rates. The proposed LGS rate elements are shown in Exhibit 2. Exhibit 3 provides redline tariff sheets for Sections 10.04 (Large General Service) and 10.05 (Large General Service – Time of Day) reflecting the revised LGS rate elements. Exhibit 4 provides clean tariff sheets for Sections 10.04 (Large General Service) and 10.05 (Large General Service – Time of Day).

⁹ See Schedule 2A of the Compliance Filing.

¹⁰ The first step in the re-design was to re-calculate the LGS intraclass revenue allocation. This was done using the EPMC methodology, *see* Ex. 56 at 6-10 (Prazak Direct), with marginal cost revenues calculated using billing determinants associated with the Department’s sales figures. *See* Rate Case Order at Order Point 28. The second step was to assess the relationship among the different voltage levels (secondary, primary, transmission) and make adjustments so that the rates followed cost causation. Finally, each rate element was reviewed and, if necessary, modified in order to move rates closer to marginal cost, improve price signals for the LGS-TOD rate group and to yield revenues equal to the embedded cost of service. *See* Ex. 60 at 1 (Large General Service Class Rate Design Agreement); Ex. 56 at (Prazak Direct).

¹¹ Ex. 60 at 1 (Large General Service Class Rate Design Agreement).

IV. IMPLEMENTATION

The Commission is authorized to allow a new rate to take effect on less than 60 days’ notice.¹² Otter Tail and the Chamber request the revised LGS rates be approved for implementation on May 1, 2017 in order to resolve unintended bill increases for some LGS customers and align LGS rates with the LGS Rate Design Agreement and rate design fundamentals.

V. CONCLUSION

Otter Tail and the Chamber respectfully request the Commission reopen the Compliance Order to allow for revision of Otter Tail’s LGS rates as provided above.

Otter Tail Power Company

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Minnesota Chamber of Commerce

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of Commerce

¹² Minn. Stat. § 216B.16, subd. 1 (“Unless the commission otherwise orders, no public utility shall change a rate which has been duly established under this chapter, except upon 60 days’ notice to the commission.”).

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

Line No.	Rate Schedule	Operating Revenues		Difference	Percent Change
		Test Year Present	Approved on 5/1/17		
1	10.04 Large General Service - Secondary Service (Rate 603)	\$ 24,111,094	\$ 26,852,874	\$ 2,741,780	11.37%
2	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,690,309	\$ 3,768,507	\$ 78,198	2.12%
3	10.04 Large General Service - Transmission Service (Rate 632)	\$ 297,627	\$ 273,666	\$ (23,961)	-8.05%
4	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,497,338	\$ 9,898,586	\$ 401,248	4.22%
5	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 13,367,301	\$ 14,629,415	\$ 1,262,114	9.44%
6	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,109,225	\$ 47,834,401	\$ 725,176	1.54%
7	Total Large General Service:	\$ 98,072,896	\$ 103,257,449	\$ 5,184,553	5.29%
8					

OTP-Chamber PROPOSED Test Year 2016 Operating Revenue Summary Comparison - By Rate Schedule

9	10.04 Large General Service - Secondary Service (Rate 603)	\$ 24,111,094	\$ 26,339,030	\$ 2,227,936	9.24%
10	10.04 Large General Service - Primary Service (Rate 602)	\$ 3,690,309	\$ 3,820,803	\$ 130,494	3.54%
11	10.04 Large General Service - Transmission Service (Rate 632)	\$ 297,627	\$ 309,531	\$ 11,904	4.00%
12	10.05 Large General Service Time of Day - Secondary Service (Rates 611, 615, 613)	\$ 9,497,338	\$ 9,991,203	\$ 493,865	5.20%
13	10.05 Large General Service Time of Day - Primary Service (Rates 610, 614, 612)	\$ 13,367,301	\$ 13,837,054	\$ 469,753	3.51%
14	10.05 Large General Service Time of Day - Transmission Service (Rates 639, 637, 640, 649)	\$ 47,109,225	\$ 48,959,828	\$ 1,850,603	3.93%
15	Total Large General Service:	\$ 98,072,896	\$ 103,257,449	\$ 5,184,553	5.29%
16					
17	Total Large General Service-Difference:	\$ -	\$ -	\$ -	0%
18					

Exhibit 3
Redline Tariff Sheet
Sections 10.04 and 10.05



Fergus Falls, Minnesota

LARGE GENERAL SERVICE

DESCRIPTION	RATE CODES
Secondary Service	32-603
Primary Service	32-602
Transmission Service	32-632

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 nonresidential Customers. This schedule is not applicable for outdoor lighting. Emergency and supplementary/Standby service will be supplied only as allowed by law.

RATE:

SECONDARY SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month per annual max. kW (minimum 80 kW per Month)		
Less than 1000 kW:	\$0.55 /kW	
Greater than or equal to 1000 kW:	\$0.45 /kW	
Energy Charge per kWh:	Summer	Winter
	5.2484.875 ¢/kWh	5.5035.088 ¢/kWh
Demand Charge per kW (minimum of 80 kW):	Summer	Winter
	\$40.9511.65 /kW	\$8.509.40 /kW



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
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ELECTRIC RATE SCHEDULE
Large General Service

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PRIMARY SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month per annual max. kW (minimum 80kW per Month)		
All kW:	\$0.25 /kW	
Energy Charge per kWh:	Summer	Winter
	5.0474.869 ¢/kWh	5.2495.065 ¢/kWh
Demand Charge per kW (minimum of 80 kW):	Summer	Winter
	\$10.4511.45 /kW	\$8.059.30 /kW

TRANSMISSION SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month per annual max. kW (minimum 80kW per Month)		
All kW:	\$0.00 /kW	
Energy Charge per kWh:	Summer	Winter
	4.2884.798 ¢/kWh	4.4044.928 ¢/kWh
Demand Charge per kW (minimum of 80 kW):	Summer	Winter
	\$7.2810.00 /kW	\$7.418.00 /kW



Fergus Falls, Minnesota

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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 schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30.

Winter: October 1 through May 31.

METERED DEMAND: The maximum kW as measured by a Demand Meter for any period of 15 consecutive minutes during the month for which the bill is rendered.

ADJUSTMENT FOR EXCESS REACTIVE DEMAND: For billing purposes, the Metered Demand may be increased by 1 kW for each whole 10 kVar of measured Reactive Demand in excess of 50% of the Metered Demand in kW.

DETERMINATION OF BILLING DEMAND: The Billing Demand shall be the greater of 80 kW or the Metered Demand adjusted for Excess Reactive Demand.

DETERMINATION OF FACILITIES CHARGE: The Facilities Charge Demand will be based on the greater of 1) 80 kW or 2) the largest of the most recent 12 monthly Billing Demands.



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
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Large General Service – Time of Day

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LARGE GENERAL SERVICE - TIME OF DAY

DESCRIPTION	On-Peak	Shoulder	Off-Peak
Secondary Service	32-611	32-615	32-613
Primary Service	32-610	32-614	32-612
Transmission Service	32-639	32-637	32-640

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 nonresidential Customers with a measured Demand of at least 80 kW within the most recent 12 months.

RATE:

SECONDARY SERVICE			
Customer Charge per Month:	\$120.00		
Monthly Minimum Bill:	Customer + Facilities Charges		
Facilities Charge per Month			
per annual max. kW (minimum 80 kW per Month):			
Less than 1000 kW:	\$0.55/kW		
Greater than or equal to 1000 kW:	\$0.45/kW		
Energy Charge per kWh:	Summer	Winter	
On-Peak	6.8787.652 ¢/kWh	5.7386.384 ¢/kWh	¢/kWh
Shoulder	5.2345.820 ¢/kWh	5.2765.870 ¢/kWh	¢/kWh
Off-Peak	2.9493.281 ¢/kWh	3.5253.922 ¢/kWh	¢/kWh
Demand Charge per kW (minimum 80 kW per Month):	Summer	Winter	
On-Peak	\$11.808.90 /kW	\$10.076.65 /kW	/kW
Shoulder	\$2.142.75 /kW	\$2.152.75 /kW	/kW
Off-Peak	\$0.00 /kW	\$0.00 /kW	/kW



Fergus Falls, Minnesota

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Large General Service – Time of Day

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PRIMARY SERVICE			
Customer Charge per Month:	\$120.00		
Monthly Minimum Bill:	Customer + Facilities Charges		
Facilities Charge per Month			
per annual max. kW (minimum 80 kW per Month):	\$0.25/kW		
Energy Charge per kWh:	Summer	Winter	
On-Peak	7.48 <u>5.531</u> ¢/kWh	6.19 <u>4.232</u> ¢/kWh	
Shoulder	5.71 <u>5.746</u> ¢/kWh	5.71 <u>5.748</u> ¢/kWh	
Off-Peak	3.23 <u>4.253</u> ¢/kWh	3.83 <u>4.855</u> ¢/kWh	
Demand Charge per kW:	Summer	Winter	
(minimum 80 kW per Month):			
On-Peak	\$11.35 <u>8.75</u> /kW	\$9.59 <u>6.60</u> /kW	
Shoulder	\$2.05 <u>2.70</u> /kW	\$2.05 <u>2.70</u> /kW	
Off-Peak	\$0.00 /kW	\$0.00 /kW	

TRANSMISSION SERVICE			
Customer Charge per Month:	\$120.00		
Monthly Minimum Bill			
per annual max. kW			
(minimum 80 kW per Month):	Customer + Facilities Charges		
Facilities Charge per Month:	\$0.00		
Energy Charge per kWh:	Summer	Winter	
On-Peak	6.74 <u>0.265</u> ¢/kWh	5.50 <u>9.938</u> ¢/kWh	
Shoulder	5.16 <u>9.571</u> ¢/kWh	5.10 <u>4.502</u> ¢/kWh	
Off-Peak	2.94 <u>8.178</u> ¢/kWh	3.44 <u>4.712</u> ¢/kWh	
Demand Charge per kW:	Summer	Winter	
(minimum 80 kW per Month):			
On-Peak	\$7.66 <u>7.70</u> /kW	\$8.84 <u>5.70</u> /kW	
Shoulder	\$1.72 <u>2.30</u> /kW	\$1.88 <u>2.30</u> /kW	



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Off-Peak	\$0.00 /kW	\$0.00 /kW
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Fergus Falls, Minnesota

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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 schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30.

Winter: October 1 through May 31.

METERED DEMAND: The maximum kW as measured for one hour during each of the On-peak, Shoulder and Off-Peak periods during the month for which the bill is rendered.

ADJUSTMENTS FOR EXCESS REACTIVE DEMANDS: For billing purposes, the Metered Demands may be increased by one kW for each whole ten kVar of Reactive Demand in each period in excess of 50% of the Metered Demand in kW.

DETERMINATION OF BILLING DEMAND: The Billing Demand shall be the Metered Demand adjusted for Excess Reactive Demand.

DETERMINATION OF FACILITIES CHARGE: The Facilities Charge Demand will be based on the greater of 1) 80 kW, or 2) the largest of the most recent 12 monthly Metered Demands adjusted for Excess Reactive Demand.

DEFINITION OF ON-PEAK, SHOULDER AND OFF-PEAK PERIODS BY SEASON:

WINTER SEASON - OCTOBER 1 THROUGH MAY 31 BILLINGS

On-Peak: For all kW and kWh used Monday through Friday between hours 7:00 a.m. to 11:00 a.m.

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Shoulder: For all kW and kWh used Monday through Friday between hours 6:00 a.m. to 7:00 a.m., 11:00 a.m. to 10:00 p.m., and on weekends between hours 6:00 p.m. to 10:00 p.m. NC
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Off-Peak: For all kW and kWh used Monday through Friday between hours 10:00 p.m. to 6:00 a.m. and on weekends between hours 10:00 p.m. to 6:00 p.m. N
C

SUMMER SEASON - JUNE 1 THROUGH SEPTEMBER 30 BILLINGS

On-Peak: For all kW and kWh used Monday through Friday between hours 1:00 p.m. to 7:00 p.m. NC

Shoulder: For all kW and kWh used Monday through Friday between hours 11:00 a.m. to 1:00 p.m., 7:00 p.m. to 10:00 p.m., and on weekends between hours 11:00 a.m. to 10:00 p.m. C
C

Off-Peak: For all kW and kWh used Monday through Friday between hours 10:00 p.m. to 11:00 a.m. and on weekends between hours 10:00 p.m. to 11:00 a.m. N
NC

Exhibit 4
Clean Tariff Sheet
Sections 10.04 and 10.05



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
 Section 10.04
ELECTRIC RATE SCHEDULE
Large General Service

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LARGE GENERAL SERVICE

DESCRIPTION	RATE CODES
Secondary Service	32-603
Primary Service	32-602
Transmission Service	32-632

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 nonresidential Customers. This schedule is not applicable for outdoor lighting. Emergency and supplementary/Standby service will be supplied only as allowed by law.

RATE:

SECONDARY SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month per annual max. kW (minimum 80 kW per Month)		
Less than 1000 kW:	\$0.55 /kW	
Greater than or equal to 1000 kW:	\$0.45 /kW	
Energy Charge per kWh:	Summer	Winter
	4.875 ¢/kWh	5.088 ¢/kWh
Demand Charge per kW (minimum of 80 kW):	Summer	Winter
	\$11.65 /kW	\$9.40 /kW

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Fergus Falls, Minnesota

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PRIMARY SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month		
per annual max. kW (minimum 80kW per Month)		
All kW:	\$0.25 /kW	
Energy Charge per kWh:	Summer	Winter
	4.869 ¢/kWh	5.065 ¢/kWh
Demand Charge per kW	Summer	Winter
(minimum of 80 kW):	\$11.45 /kW	\$9.30 /kW

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TRANSMISSION SERVICE		
Customer Charge per Month:	\$80.00	
Monthly Minimum Bill:	Customer + Facilities + Demand Charges	
Facilities Charge per Month		
per annual max. kW (minimum 80kW per Month)		
All kW:	\$0.00 /kW	
Energy Charge per kWh:	Summer	Winter
	4.798 ¢/kWh	4.928 ¢/kWh
Demand Charge per kW	Summer	Winter
(minimum of 80 kW):	\$10.00 /kW	\$8.00 /kW

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Fergus Falls, Minnesota

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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 schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30.

Winter: October 1 through May 31.

METERED DEMAND: The maximum kW as measured by a Demand Meter for any period of 15 consecutive minutes during the month for which the bill is rendered.

ADJUSTMENT FOR EXCESS REACTIVE DEMAND: For billing purposes, the Metered Demand may be increased by 1 kW for each whole 10 kVar of measured Reactive Demand in excess of 50% of the Metered Demand in kW.

DETERMINATION OF BILLING DEMAND: The Billing Demand shall be the greater of 80 kW or the Metered Demand adjusted for Excess Reactive Demand.

DETERMINATION OF FACILITIES CHARGE: The Facilities Charge Demand will be based on the greater of 1) 80 kW or 2) the largest of the most recent 12 monthly Billing Demands.



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
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ELECTRIC RATE SCHEDULE
Large General Service – Time of Day

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LARGE GENERAL SERVICE - TIME OF DAY

DESCRIPTION	On-Peak	Shoulder	Off-Peak
Secondary Service	32-611	32-615	32-613
Primary Service	32-610	32-614	32-612
Transmission Service	32-639	32-637	32-640

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 nonresidential Customers with a measured Demand of at least 80 kW within the most recent 12 months.

RATE:

SECONDARY SERVICE			
Customer Charge per Month:	\$120.00		
Monthly Minimum Bill:	Customer + Facilities Charges		
Facilities Charge per Month			
per annual max. kW (minimum 80 kW per Month):			
Less than 1000 kW:	\$0.55/kW		
Greater than or equal to 1000 kW:	\$0.45/kW		
Energy Charge per kWh:	Summer	Winter	
On-Peak	7.652 ¢/kWh	6.384	¢/kWh
Shoulder	5.820 ¢/kWh	5.870	¢/kWh
Off-Peak	3.281 ¢/kWh	3.922	¢/kWh
Demand Charge per kW	Summer	Winter	
(minimum 80 kW per Month):			
On-Peak	\$8.90 /kW	\$6.65	/kW
Shoulder	\$2.75 /kW	\$2.75	/kW
Off-Peak	\$0.00 /kW	\$0.00	/kW

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Fergus Falls, Minnesota

Minnesota Public Utilities Commission
 Section 10.05
ELECTRIC RATE SCHEDULE
Large General Service – Time of Day

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PRIMARY SERVICE		
Customer Charge per Month:	\$120.00	
Monthly Minimum Bill:	Customer + Facilities Charges	
Facilities Charge per Month		
per annual max. kW (minimum 80 kW per Month):	\$0.25/kW	
Energy Charge per kWh:	Summer	Winter
On-Peak	7.531 ¢/kWh	6.232 ¢/kWh
Shoulder	5.746 ¢/kWh	5.748 ¢/kWh
Off-Peak	3.253 ¢/kWh	3.855 ¢/kWh
Demand Charge per kW:	Summer	Winter
(minimum 80 kW per Month):		
On-Peak	\$8.75 /kW	\$6.60 /kW
Shoulder	\$2.70 /kW	\$2.70 /kW
Off-Peak	\$0.00 /kW	\$0.00 /kW

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TRANSMISSION SERVICE		
Customer Charge per Month:	\$120.00	
Monthly Minimum Bill		
per annual max. kW	Customer + Facilities Charges	
(minimum 80 kW per Month):		
Facilities Charge per Month:	\$0.00	
Energy Charge per kWh:	Summer	Winter
On-Peak	7.265 ¢/kWh	5.938 ¢/kWh
Shoulder	5.571 ¢/kWh	5.502 ¢/kWh
Off-Peak	3.178 ¢/kWh	3.712 ¢/kWh
Demand Charge per kW:	Summer	Winter
(minimum 80 kW per Month):		
On-Peak	\$7.70 /kW	\$5.70 /kW
Shoulder	\$2.30 /kW	\$2.30 /kW
Off-Peak	\$0.00 /kW	\$0.00 /kW

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Fergus Falls, Minnesota

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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 schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30.

Winter: October 1 through May 31.

METERED DEMAND: The maximum kW as measured for one hour during each of the On-peak, Shoulder and Off-Peak periods during the month for which the bill is rendered.

ADJUSTMENTS FOR EXCESS REACTIVE DEMANDS: For billing purposes, the Metered Demands may be increased by one kW for each whole ten kVar of Reactive Demand in each period in excess of 50% of the Metered Demand in kW.

DETERMINATION OF BILLING DEMAND: The Billing Demand shall be the Metered Demand adjusted for Excess Reactive Demand.

DETERMINATION OF FACILITIES CHARGE: The Facilities Charge Demand will be based on the greater of 1) 80 kW, or 2) the largest of the most recent 12 monthly Metered Demands adjusted for Excess Reactive Demand.

DEFINITION OF ON-PEAK, SHOULDER AND OFF-PEAK PERIODS BY SEASON:

WINTER SEASON - OCTOBER 1 THROUGH MAY 31 BILLINGS

On-Peak: For all kW and kWh used Monday through Friday between hours 7:00 a.m. to 11:00 a.m.

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Shoulder: For all kW and kWh used Monday through Friday between hours 6:00 a.m. to 7:00 a.m., 11:00 a.m. to 10:00 p.m., and on weekends between hours 6:00 p.m. to 10:00 p.m. NC
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Off-Peak: For all kW and kWh used Monday through Friday between hours 10:00 p.m. to 6:00 a.m. and on weekends between hours 10:00 p.m. to 6:00 p.m. N
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SUMMER SEASON - JUNE 1 THROUGH SEPTEMBER 30 BILLINGS

On-Peak: For all kW and kWh used Monday through Friday between hours 1:00 p.m. to 7:00 p.m. NC

Shoulder: For all kW and kWh used Monday through Friday between hours 11:00 a.m. to 1:00 p.m., 7:00 p.m. to 10:00 p.m., and on weekends between hours 11:00 a.m. to 10:00 p.m. C
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Off-Peak: For all kW and kWh used Monday through Friday between hours 10:00 p.m. to 11:00 a.m. and on weekends between hours 10:00 p.m. to 11:00 a.m. N
NC

CERTIFICATE OF SERVICE

**RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in the State of 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 lists by electronic service or by First Class mail.

**Otter Tail Power Company
Joint Request to Reopen Order Approving Compliance Filing**

Dated this **30th** day of **March, 2018**

/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 Service List
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_15-1033_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Joseph	Dammel	joseph.dammel@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 Service List
William T	Davis	N/A	-	23456 Garland Ln Battle Lake, MN 56515-9665	Paper Service	No	OFF_SL_15-1033_Official Service List
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_15-1033_Official Service List
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_15-1033_Official Service List
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Dan	Harmelink	Dan.Harmelink@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_15-1033_Official Service List
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Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_15-1033_Official Service List
Linda	Jensen	linda.s.jensen@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Lachowitz	blachowitz@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Ave S Burnsville, MN 55337-3527	Electronic Service	No	OFF_SL_15-1033_Official Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-1033_Official Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_15-1033_Official Service List
Peter	Madsen	peter.madsen@ag.state.mn.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-1033_Official Service List
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 Service List
Tom	Micheletti	tommicheletti@excelsiorenergy.com	Excelsior Energy Inc.	225 S 6th St Ste 2560 Minneapolis, MN 55402-4638	Electronic Service	No	OFF_SL_15-1033_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_15-1033_Official Service List

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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_15-1033_Official 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 Service List
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_15-1033_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-1033_Official 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 Service List
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