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June 12, 2019

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

**RE: In the Matter of a Commission Inquiry into the Impact of Severe Weather in  
January and February 2019 on Utility Operations and Service  
Docket No. E,G-999/CI-19-160  
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits its Reply Comments in response to the to the Minnesota Department of Commerce, Division of Energy Resources (Department) May 20, 2019 comments in the above described matter. In these Reply Comments, Otter Tail responds to information requests from the Department made of all utilities.

**All Utilities:**

- *A discussion of whether interstate pipeline issues impacted operations during the cold weather event and what, if any, impact this had on rates or reliability;*

The operations at Otter Tail's Solway natural gas generation facility were not impacted by interstate pipeline issues during the cold weather event.

- *A detailed discussion of their current communications with interruptible customers regarding curtailments, including frequency and content, and proposed language memorializing communication best practices;*

When a load reduction is necessary for a severe weather event, Otter Tail directly contacts, by phone, large load customers to request load reduction. If requested by MISO, Otter Tail also distributes a public appeal to radio and television stations in the service area, requesting the public to use less electricity (sample seasonal news releases provided as Attachments 1 and 2 to these Reply Comments). The Minnesota Department of Commerce is included in the news release distribution.

If MISO requests, Otter Tail contacts customers with behind-the-meter generators to start their generators.

- *A discussion of the instances when public communication from the Commission is appropriate during a severe weather event, or operational issue, and how these communications should be made.*

Otter Tail believes that utilities are best positioned to convey messages to customers during a severe weather event. If MISO requests load control or load reduction is needed, our load reduction policy outlines a detailed communication plan (discussed above). Otter Tail's load reduction communication plan includes the Minnesota Department of Commerce on the news release distribution list.

During a severe weather event, the Minnesota Department of Commerce can share Otter Tail's news release(s) and/or social media posts if it wishes.

Otter Tail 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 218-739-8385 or at [bhaugen@otpc.com](mailto:bhaugen@otpc.com).

Sincerely,

/s/ *BRYCE C. HAUGEN*

Bryce C. Haugen, Sr. Rates Analyst  
Regulatory Administration

mmo

Enclosures

By electronic filing

c: Service List



## News release

**Contact: Stephanie Hoff**

shoff@otpc.com

218-739-8535 (office)

218-205-6179 (after hours)

### **Otter Tail Power Company asks customers to reduce energy usage between 11 a.m. and 8 p.m. today**

**Fergus Falls, Minnesota, [Date]:** This week's unusually **high temperatures and humidity** have combined to cause an extremely heavy demand for electricity in Otter Tail Power Company's service area **(and our neighboring service areas)**. As a result, company officials are asking **(are joining with other companies in our region to ask)** their customers to reduce energy consumption voluntarily today from **11 A.M. until 8 P.M.**

According to Otter Tail Power Company Vice President **JoAnn Thompson**, the following actions will help you do your part to conserve electricity:

- Use only necessary lights and turn them off when you leave a room.
- Turn off and unplug television sets and computers that are not being used.
- Use fewer electrical appliances whenever possible, especially dehumidifiers.
- Move up your air-conditioning thermostat setting a few degrees.
- Delay laundry and dishwashing, if possible.
- Consider serving cold sandwiches or a salad for the evening meal.
- Postpone taking a shower **until after 8 P.M.**

Businesses and institutions can help too by turning off overhead lights in buildings and working by task lights only, turning off heat pumps and air conditioners for a maximum of 6 hours, and turning off exterior lights on company buildings including advertising signs.

"We're doing what we can to reduce our energy use at company offices and plants today, and we appreciate anything our customers can do to defer unnecessary electrical consumption until after **8:00 this evening,**" adds Thompson.

This coordinated effort is being conducted in accordance with North American Electric Reliability Corporation (NERC) protocols that are in place to ensure the reliability of the transmission grid in such circumstances. MISO is coordinating the implementation of these protocols as the NERC Reliability Coordinator in this region.

This news release is on our website at [otpc.com/newsroom](http://otpc.com/newsroom).

Otter Tail Power Company, a subsidiary of Otter Tail Corporation (NASDAQ Global Select Market: OTTR), is headquartered in Fergus Falls, Minnesota. With a balanced commitment to environmental, economic, and community stewardship, the company provides electricity and energy services to more than a quarter million people in Minnesota, North Dakota, and South Dakota. To learn more about Otter Tail Power Company visit [otpc.com](http://otpc.com). To learn more about Otter Tail Corporation visit [ottertail.com](http://ottertail.com).

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## News release

**Contact: Stephanie Hoff**

shoff@otpc.com

218-739-8535 (office)

218-205-6179 (after hours)

### Otter Tail Power Company asks customers to reduce energy usage between 11 a.m. and 8 p.m. today

**Fergus Falls, Minnesota, [Date]:** Because this week's extremely cold temperatures are causing high demand for electricity, Otter Tail Power Company and the Mid-Continent Independent System Operator, Inc. (MISO) are asking customers to reduce energy use voluntarily **today and tonight** to help ensure the reliability of the transmission grid.

According to Otter Tail Power Company Vice President **JoAnn Thompson**, the following actions will help you do your part to conserve electricity:

- Use only necessary lights and turn them off when you leave a room. Especially consider limiting outdoor lighting. ([Do you still have your holiday decorations lit?](#))
- If you are using electricity to heat your home, move your heating system thermostat down a few degrees. Make sure that furniture or drapes do not cover heat registers or return vents. That could make a big difference in how warm a room feels.
- Use kitchen and bathroom fans sparingly because they draw out heated air.
- Cook more than one dish at a time to use your oven's heat more efficiently. Microwaves or toaster ovens are more efficient if you're cooking a small amount of food.
- Delay laundry and dishwashing until later in the evening.
- Use fewer electrical appliances whenever possible. Turn off computers and televisions and unplug cell phone chargers, etc. when not in use.
- Think of drapes and shades as window insulation. Use them to let heat in when the sun is shining and to keep cold out at night.
- If you use an engine heater, activate it with a timer.

Businesses and institutions can help too by turning off unnecessary overhead and outdoor lights, turning down thermostats, and limiting the use of exhaust fans, within limits of safety and security.

This coordinated effort is being conducted in accordance with North American Electric Reliability Corporation (NERC) protocols that are in place to ensure the reliability of the transmission grid in such circumstances. MISO is coordinating the implementation of these protocols as the NERC Reliability Coordinator in this region.

This news release is on our website at [otpc.com/newsroom](http://otpc.com/newsroom).

Otter Tail Power Company, a subsidiary of Otter Tail Corporation (NASDAQ Global Select Market: OTTR), is headquartered in Fergus Falls, Minnesota. With a balanced commitment to environmental, economic, and community stewardship, the company provides electricity and energy services to more than a quarter million people in Minnesota, North Dakota, and South Dakota. To learn more about Otter Tail Power Company visit [otpc.com](http://otpc.com). To learn more about Otter Tail Corporation visit [ottertail.com](http://ottertail.com).

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## **CERTIFICATE OF SERVICE**

**RE: In the Matter of a Commission Inquiry into the Impact of Severe Weather in  
January and February 2019 on Utility Operations and Service  
Docket No. E,G-999/CI-19-160**

I, Mikayla Osterman, 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  
Reply Comments**

Dated this **12th** day of **June, 2019**.

/s/ MIKAYLA OSTERMAN

Mikayla Osterman  
Regulatory Filing Coordinator  
Otter Tail Power Company  
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