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October 12, 2020

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

**RE: In the Matter of a Commission Inquiry Into Electric Vehicle Charging and
Infrastructure
Docket No. E999/CI-17-879**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail or the Company) submits these Reply Comments in response to September 30, 2020 comments submitted by Greenlots, the Clean Energy Groups (CEGs) and the Minnesota Department of Commerce's Division of Energy Resources (Department). The Company appreciates comments by interested stakeholders as the Company continues to develop electric vehicle (EV) related customers solutions.

Comments from Greenlots supported the Minnesota Public Utility Commission's (Commission) approval of each Companies' Transportation Electrification Plans (TEP) and offered the following points for commission consideration. Future TEP should support:

- medium and heavy-duty electrification, equity and environmental justice considerations,
- More detail in EV forecast assumptions and the market and policy developments,
- TEP guidance should include discussion on current and planned activities to support EV equity and equitable access to transportation electrification both from urban-rural standpoint, and socioeconomic standpoint.
- Discussion of utility plans and activities to expand or scales existing programs, as applicable.

A response to Greenlot's requests is included within the Company's response to the Department's comments.

CEGs found Otter Tail's TEP as "a reasonable course of action considering OTP's role as a rural service provider whose territory has only 60 EVs and is expected to have lower rates of EV adoption over the next few years." CEGs comments concluded by recommending the Commission to approve Otter Tail's TEP.

The Department recommends the Commission accept Otter Tail's TEP, but also offered further recommended requirements for all three utilities. These additional recommendations require the following information to be included in future TEPs:

- the 5-year budget for future expenditures, as well as historical expenditures, for each non-pilot EV program, by budget category. In addition, the budget categories by program should be aggregated so that the Commission and stakeholders can see the total amounts that are being proposed or expended for each budget category (e.g., marketing, EV charging infrastructure, etc.).
- an estimate for each system upgrade needed to accommodate EV charging, and an estimate of the expenditures on other investments that improve a utility's ability to serve EV load.
- non-pilot EV program evaluations that examine the cost-effectiveness of the programs as currently designed and potential changes that could improve their cost-effectiveness.

Otter Tail understands the Department's desire for bringing further transparency and clarity on cost-effectiveness of utility EV initiatives and agrees that transparency on EV programming is very important to the Company and stakeholders as utilities develop EV customer offerings. Otter Tail accepts the Department's request for further reporting in these areas, but cautions the Commission on adopting these requirements since at this time five-year forecasts, tracking costs from limited distribution extensions, and cost-effectiveness modeling may not provide an accurate picture of future realities as programs are still in their infancy stage.

For Otter Tail, it likely can meet the expanded requirements proposed by Greenlots and the Department, but the usefulness of the information reported annually may not be very informative or could be unintentionally misleading to stakeholders and customers. Policies and incentives surrounding EVs are constantly changing and transforming and while the Company has exuberance to expand EV programming, most spending will be in response to the rapidly changing EV policies, associated technologies, and customer desires. Items requested are outside of Otter Tail's control and likely very limited to change over a one-year timeframe. It may be more appropriate for the Commission to require the TEP reports every two years instead of annually. A two-year report would include a larger data set providing more accurate and meaningful information to stakeholders. Otter Tail requests if the Commission requires significant reporting requirements that the TEPs become a every two-year or biennial filing.

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 GRENIER

Jason Grenier
Manager
Market Planning

cjh
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Inquiry Into Electric Vehicle Charging and
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Docket No. E999/CI-17-879**

I, Carly Haiby, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert 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
Comments**

Dated this **12th** day of **October, 2020**.

/s/ CARLY HAIBY

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