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June 1, 2021



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

**RE: In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's
Economic Recovery from the COVID-19 Pandemic
Docket No. E017/M-21-201
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits these Supplemental Comments in the above-referenced docket to further refine its request to advance certain projects for purposes of stimulating economic recovery from the COVID-19 Pandemic.

In these Comments, Otter Tail addresses comments filed on May 3, 2021 by the Department of Commerce, Division of the Energy Resources, and the Office of the Attorney General-Residential Utilities Division.

Otter Tail electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the Department of Commerce, Division of the Energy Resources, and the Office of the Attorney General-Residential Utilities Division. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at (218) 739-8279 or at stommerdahl@otpc.com.

Sincerely,

/s/ *STUART TOMMERDAHL*
Stuart Tommerdahl
Manager, Regulatory Administration

tlk
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of an Inquiry into
Utility Investments that May Assist in
Minnesota's Economic Recovery from
the COVID-19 Pandemic**

Docket Nos. E017/M-21-201

**OTTER TAIL POWER COMPANY
REPLY COMMENTS**

I. OVERVIEW

Otter Tail Power Company's (Otter Tail's or Company's) June 17, 2020 initial filing on the subject of this filing included 12 proposed projects to meet the objectives set forth by the Minnesota Public Utilities Commission's May 20, 2020 Notice in Docket EG999-CI-20-492. The Commission set the following criteria and requested proposals that:

- Provide significant utility system benefits;
- Are consistent with approved resource plans, approved natural gas distribution infrastructure or pipeline safety plans, triennial conservation plans, and existing Commission orders;
- Reduce carbon or other pollutant emissions in the power sector or across economic sectors;
- Increase access to conservation and clean energy resources for Minnesotans;
- Create jobs or otherwise assist in economic recovery for Minnesotans;
- And use woman, veteran, or minority owned businesses as much as possible and provide documentation of these efforts.

In Otter Tail's September 17, 2020 Comments in Docket EG999-CI-20-492, an update was provided on the original 12 projects. Eight of the projects remained in the First Tranche request with three of these projects; Hoot Lake Solar, Acceleration of Streetlight Transition from HID to LED, and Increase CIP Rebates for Heat Pumps and POP Solar included in a different method of recovery. The five remaining projects; System Infrastructure and Reliability (SIRI), Telecommunications Projects, Acceleration of Distribution of Transmission Vegetation Management, Ground Line Inspection, and Minnesota Buildings Maintenance remained as projects with a needed method for recovery.

In Supplemental Comments filed by Otter Tail on March 3, 2021, in Docket EG999-CI-20-492, Otter Tail further narrowed the number of projects still needing a method for cost recovery to three, as other methods of cost recovery were found for the original nine projects. The three remaining project categories are: SIRI, Acceleration of Distribution and Transmission Vegetation Management, and Minnesota Buildings Maintenance.

On March 30, 2021, the Commission created this separate docket for evaluating Otter Tail's March 3, 2021 filing. On May 3, 2021, the Department of Commerce (DOC) and the Office of the Attorney General (OAG) filed comments in the above-captioned docket. These Reply Comments address those Comments.

II. RESPONSES TO DOC AND OAG COMMENTS

A. Otter Tail and the DOC agree the three projects proposed should be approved and authorized for deferral.

In its Comments, the DOC recommends approval of the SIRI, vegetation management, and building maintenance investments as submitted by Otter Tail.¹ Otter Tail appreciates the DOC's support for the projects and confirmation these projects meet the objectives set out by the Commission. Otter Tail agrees to provide an annual compliance filing as recommended by the DOC, which will include the following information:

- A comparison showing the amount of capital costs and non-capital expenses incurred versus the amount budgeted; and costs/expenses will be broken down by major category;
- A comparison showing the scope of proposed work versus scope of work completed;
- The total number of people employed for the project, with a breakdown showing the number of permanent versus temporary workers, the number of Company employees versus outside contractors, and the number of women, veterans, and BIPOC workers;
- Measures or metrics demonstrating whether and to what extent the Company's investments have resulted in improved system reliability and/or improved customer service;
- For the accelerated vegetation management, Otter Tail will include an analysis showing whether and to what extent this incremental vegetation management activity contributed to improved reliability;

¹ DOC Comments at 4 (SIRI); 5 (Vegetation Management); and 7 (building maintenance).

- For the building maintenance investments, Otter Tail will include an analysis showing whether and to what extent its response time to power outages has improved;
- For the SIRC investments, Otter Tail will include an analysis of any relevant metrics that demonstrate that its system reliability has measurably improved.

B. For the SIRC and Minnesota buildings projects, authority to defer the annual depreciation expense, the accrued cost of capital and the incremental O&M expenses will be necessary, or the deferral will be an empty gesture that will not permit the projects to go forward.

In its Comments, the DOC recommends approval of the projects and deferral; however, for the SIRC and building maintenance projects, it recommends the annual depreciation expense, the annual costs of deployed capital (the return), and the annual O&M costs not be authorized for deferral. As a practical matter, this recommendation would result in there being no deferral at all for the SIRC and building maintenance projects. The annual revenue requirements of these capital investments are largely comprised of the following: 1) the annual depreciation expense; 2) the annual cost of the deployed capital; and 3) the annual O&M costs (including taxes, etc.). The DOC's recommended approval limits Otter Tail to include only the depreciated capital costs and accrued AFUDC in future rate cases. But Otter Tail would not need any deferred accounting authority for the DOC's recommended approach to these projects.

But as explained in Otter Tail's Petition, the impact of the otherwise unrecovered current annual revenue requirements (made up of current depreciation expense, current cost of capital deployed, and current O&Ms) would result in financial deficiencies and a need to delay projects until they can be prioritized into the Company's routine capital budget (the size of which is limited to prevent financial deficiencies, as explained further below). And the concern is amplified in the early years after a capital project goes into service, due to the way depreciation works where the highest revenue requirements for a project are in the first years after construction. For these reasons, if the authorization for deferral excludes the annual depreciation expense, the cost of capital, and the O&M expenses, the impact will be the same revenue deficiency that has previously prevented Otter Tail from deploying capital to these projects. In other words, it will be as if the approval had not been granted and no financial path will exist to permit going forward with the projects. The purpose behind this docket, as Otter Tail understands it, will not be satisfied.

The DOC Comments suggest that deferring depreciation and O&M expenses “undermines the ratemaking process by allowing the company to simultaneously recover representative levels of these expenses through base rates . . . *and* track the expenses for future dollar-for-dollar recovery.”² To this point, the purpose of deferral for these capital projects is to track the expenses for future dollar-for-dollar recovery, but it does not undermine the rate making process. Instead, it is how the deferral must work to facilitate an increase to capital spending. Otter Tail has requested deferral to go above its current budgeted spend, which is generally constrained to “routine capital spending,” or the amount budgeted without causing revenue requirement deficiencies. The Company also budgets for “non-routine capital spending,” which have some other cost recovery mechanism to cover the annual revenue requirements until the next rate proceeding. The other cost recovery mechanism usually consists of a rider mechanism to prevent the revenue requirement deficiencies. It could also consist of a deferred accounting authority such as requested in this proceeding—but that authority must cover the depreciation expense, the cost of the capital deployed, and the O&Ms relating to the capital investment.

So, in summary, the point of the request in this docket is to remove the financial constraint on capital deployment for the SIRI and building maintenance projects. The obstacle is largely that rates are based on a representative (routine) amount of capital spend, as the DOC comments point out. Otter Tail requests deferral of the annual revenue requirements for these specific projects so it can deploy capital above representative (routine) amounts. Without the authority, the Company must continue to be constrained to the routine amount.

C. Otter Tail agrees that only the O&M expenses related to vegetation management that are incremental to those approved in OTP’s rate case proceeding in Docket No. E017/GR-20-719 will be included in the deferral.

As the DOC points out in its Comments, the vegetation management acceleration project is an O&M project making it somewhat different from the SIRI and building maintenance projects: the entirety of the spend would ordinarily be recognized as expense in the year incurred. The DOC, therefore, recognizes if deferral of the expenses is not authorized, then there will be no deferral or opportunity for recovery in a future proceeding and the additional expenditures will have to be delayed. The DOC also correctly points out the request is only for amounts spent over the annual vegetation management expense expected to be approved in the Otter Tail’s currently

² DOC Comments at 13 (emphasis in original).

pending rate case.³ The Company agrees and clarifies, to the extent necessary, only the incremental increases over the annual level of vegetation management expense included in base rates will be deferred.

D. Otter Tail disagrees with the OAG's recommendation to deny Otter Tail's request.

The OAG's primary objection appears to be the projects proposed by Otter Tail meet only some of the Commission's criteria, not each and every criterion. The Company does not interpret the Commission's application of criteria to be so constrained. Such an interpretation would restrict qualified projects so narrowly and defeat the purpose of these. Although Otter Tail's three projects do not meet all the conditions listed in the May 22, 2020 order, they do meet all criteria applicable to the projects identified and not due to some deficiency in the proposal. Otter Tail's June 17, 2020 Initial Comments identified which of the criteria each of the projects met as well as the criteria the project would not meet due to the type and nature of project proposed.

Also, these projects are designed to have material beneficial impact on Otter Tail's service to customers and with a broad outreach to the communities served by Otter Tail in rural western and northwestern Minnesota. Otter Tail felt it important to focus on projects that could spur the economy as much as possible in our local communities (and meet other Commission criteria). Each of the three projects proposed focus on local Minnesota communities as well as real and practical improvements to reliability and service to customers. As earlier indicated, the Company appreciates the support and confirmation by the Department the proposed projects meet the criteria and purposes of the Commission's earlier direction and should be approved.

E. Otter Tail responses to additional information requested by the DOC.

In its Comments, the DOC requests several items of additional information, including a comparison showing the difference between the existing and proposed SIRC capital expenditures, revenue requirements, and scope of work forecasted for 2022, 2023, and 2024.⁴

Table 1, lines 1-3 below include the information on SIRC capital spend and revenue requirements for the 2021 test year, along with 2022 – 2024 total SIRC capital spend and revenue requirements inclusive of the incremental increase in SIRC spend proposed in this Docket. Table 1, lines 4-6 shows the incremental impact associated with the \$15 million of additional spend

³ Docket E017/GR-20-719.

⁴ DOC Reply Comments, page 4.

requested in this Docket. Also, the forecasted capital expenditures, revenue requirements and scope of work is reflected in Attachments 1 & 2 to these Reply Comments.

Table 1

A	B	C	D	E	F	G
	System Infrastructure and Reliability Improvement (SIRI)	Jurisdictional Factor (Blended D2 and D4)	2021TY	2022	2023	2024
				Inclusive of \$15 M COVID 19 Economic Recovery Request		
1	Total OTP Test Year plus COVID 19 Request Spend (Million)		\$27.6	\$42.5	\$42.5	\$42.5
2	Total Revenue Requirement		\$1.6	\$6.0	\$11.3	\$16.5
3	MN Share (Million)	43.70%	\$0.7	\$2.6	\$4.9	\$7.2
				\$15 M COVID 19 Economic Recovery Request		
4	Total OTP COVID 19 Request Spend (Million)			\$15.0	\$15.0	\$15.0
5	Total Revenue Requirement			\$0.9	\$2.8	\$4.7
6	MN Share (Million)	43.70%		\$0.4	\$1.2	\$2.0

These Attachments are Otter Tail’s responses to IR-OAG-1051 and IR-OAG-1053 in Otter Tail’s rate case. Attachment 1 is Otter Tail’s response to IR-OAG-1051 which include schedules that show the historical O&M and capital costs from 2015 through 2020 and the 2021 test year forecasted budget and actual spend through February for the vegetation management and building maintenance projects. Attachment 2 is Otter Tail’s response to IR-OAG-1053 which includes a schedule that shows the \$27.6 million (OTP Total) \$12.1 million (OTP MN) 2021 test year forecasted SIRI project spend by month including actual spend through February. These Attachments also serve as workpapers from Docket No. E017/GR-20-719, that support the amounts in Table 2 in the Department’s Comments, as requested.

As indicated in earlier filings, the bulk of the SIRI projects represent replacement of aged transmission and distribution facilities across Otter Tail’s service territory. The Company has identified a need to increase the rate of replacements, as its current replacement programs are not adequate to keep pace with the high rate of upcoming asset retirement. This includes transmission line replacement projects, cutout failure replacement programs, increased underground replacement programs, distribution substation replacement programs, and distribution line replacement programs. The ideal average age of transmission poles is around half of the expected 70-year life of a pole or about 35 years. With Otter Tail’s current average spend, the Company would be setting a replacement pace that has a calculated expected life of transmission poles of around 110 years. This is nearly 60 percent longer than the high end of average expected pole age. Historically, this has not been of concern due to the vintage of the assets in the field; however, a larger influx of assets is approaching average end of life. Statistically, the current average age of the transmission pole fleet is 45 years old and has been growing around half of a year per year. The proposed projects will reverse the trend of increasing average age of poles.

Additionally, the amounts provided in Table 2 of the DOC's Comments, were originally provided in Otter Tail's response to Information Request No: MN-DOC-007 in Docket EG999-CI-20-492. In that response we explained:

Table 1 below breaks out the approximate annual revenue requirements applicable to the amounts included in the 2021 Test Year in the most recent general rate case (Docket No. E017/GR-20-719) for System Infrastructure & Reliability (SIRI), Building Maintenance, and Distribution & Transmission Vegetation Management. These revenue requirement estimates take into account timing of capital or O&M spend during the test year, associated depreciation, ADIT, taxes, and return based on the proposed test year rate of return.

Building maintenance is not directly discussed in the rate case docket but is included across multiple functional O&M expense and capital budget categories per the functional use of the facilities.

Distribution & Transmission Vegetation Management is not directly discussed but is included in the distribution and transmission O&M expense discussed on pages 10-11 of Ms. Christine Petersen's Direct Testimony.

*The SIRI project is discussed on pages 27-28 of Mr. Stuart Tommerdahl's Direct Testimony in the rate case.*⁵

Table 2						
A	B	C	D	E	F	
	2021 Test Year General Rate Case E017-GR-20-719	Jurisdictional Factor	Total OTP Cost (Thousand)	Total MN Jurisdiction Cost (Thousand)	Total MN Revenue Requirement (Thousand)	
1	Acceleration of Distribution and Transmission Vegetation Management					
2	Total Revenue Requirements in 2021 Test Year (MN Rate Case)	Blended D2 and D4	43.27%	\$2,184	\$945	\$945
3	Building Maintenance					
4	Total Revenue Requirements in 2021 Test Year (MN Rate Case)	P90	49.22%	\$1,428	\$703	\$89
5	System Infrastructure & Reliability (SIRI)					
6	Total Revenue Requirements in 2021 Test Year (MN Rate Case)	Blended D2 and D4	43.70%	\$27,577	\$12,051	\$695

⁵ Docket No. E017/GR-20-719

F. The DOC also asked Otter Tail to clarify whether the “Total OTP Cost” figures shown in Table 1 of Attachment 1 to the DOC’s Comments represent the overall Minnesota jurisdictional spending included in Docket No. E017/GR-20-719 (Otter Tail’s pending rate case) for the three proposed projects.

The numbers represented in Table 1 of Attachment 1 to the DOC’s Comments do not represent the jurisdictional spend included in Docket No. E017/GR-20-719. The numbers in Table 1 of Attachment 1 to the DOC’s Comments represent the total company spend included in Docket No. E017/GR-20-719. See Table 2 (above) for the jurisdictional allocation spend for the three proposed projects.

III. CONCLUSION

Otter Tail appreciates the review of the DOC and OAG in this docket and agrees to provide an annual compliance filing as recommended by the DOC. Otter Tail requests the PUC approve the following projects: SIRI, Acceleration of Distribution and Transmission Vegetation Management, and Minnesota Buildings Maintenance; and allow the deferral of their costs, above the amounts included in the Company’s current pending rate case which includes the annual depreciation expense, the annual costs of deployed capital (the return), and the annual O&M costs.

Dated: June 1, 2021

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ STUART TOMMERDAHL

Stuart Tommerdahl

Manager, Regulatory Administration

Otter Tail Power Company

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Response to Information Request MN-OAG-1051
Page 1 of 2

OTTER TAIL POWER COMPANY
Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General
Analyst: Peter Scholtz
Date Received: March 05, 2021
Date Due: March 17, 2021
Date of Response: March 17, 2021
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

Reference: OTP March 3, 2021 Filing in docket 20-492 at 4-9.

1. Indicate where in the rate case docket 20-719 the following projects are discussed and provide the O&M costs and capital costs included in the Test Year for each project.
 - a. Ground Line Inspection
 - b. Acceleration of Community Streetlight Transition from HID to LED
 - c. Advanced Distribution Management System
 - d. Acceleration of Distribution and Transmission Vegetation Management
 - e. Building Maintenance
2. If these projects listed in question #1 above have already started, provide the actual O&M and capital costs separately, and by month, for each of the projects.
3. Provide the actual O&M and capital costs incurred for each of the projects listed in question #1 above in each year, from 2015-2020.

Provide the response in Excel format with all formulas intact, and provide the cost by Total Amount, OTP Share, and MN jurisdiction.

Attachments: 2

Attachment 1 to IR MN-OAG-1051.xlsx

Attachment 2 to IR MN-OAG-1051.xlsx

Response:

1. See Attachment 1 to IR MN-OAG-1051 for 2021 Test Year O&M and Capital Budget amounts for these project categories.
 - a. This project is not directly discussed, but it is included in the distribution O&M expenses discussed on pages 10-11 of the Direct Testimony of OTP Witness Ms. Christine Petersen.

Response to Information Request MN-OAG-1051
Page 2 of 2

- b. Community street light conversion project is discussed on pages 6-7 of the Direct Testimony of OTP Witness Mr. Jason Grenier.
 - c. Advanced Distribution Management System is discussed as part of I2030 projects described in the Direct Testimony of OTP Witness Mr. Stuart Tommerdahl on pages 22 -27.
 - d. This project is not directly discussed but it is included in the distribution and transmission O&M expenses discussed on pages 10-11 of Ms. Petersen's Direct Testimony.
 - e. Building maintenance is not directly discussed but it is included across multiple functional O&M expense and capital budget categories per the functional use of the facilities.
- 2. See Attachment 1 to IR MN-OAG-1051
 - 3. See Attachment 2 to IR MN-OAG-1051

Project #	2021 Test Year															MN Jurisdiction Factor											
	January	February	March	April	May	June	July	August	September	October	November	December	Total Amount	OTP Share 100%													
1a	Ground Line Inspection																										
	Question 1	O&M Costs included in 2021 Test Year (MN Rate Case)											\$0	\$0	\$150,000	\$150,000	\$61,968										
	Question 2	Actual O&M Spend Through February											\$0	\$0	\$0	\$0	\$0										
	41.312% D4 Factor - Distribution Secondary Demand																										
1b	Acceleration of Community Streetlight Transition from HID to LED																										
	Question 1	Capital included in 2021 Test Year (MN Rate Case)											\$171,667	\$171,667	\$171,667	\$171,667	\$171,667	\$141,667	\$141,667	\$2,000,000	\$2,000,000	\$939,089					
	Question 2	Actual Capital Spend Through February											\$812,856	\$638,867						\$1,451,723	\$1,451,723	\$681,649					
	46.954% C4-Street Lighting Factor																										
1c	Advanced Distribution Management System															Not included in the 2021 Test Year											
1d	Acceleration of Distribution and Transmission Vegetation Management																										
	Question 1	O&M Costs included in 2021 Test Year (MN Rate Case)-Transmission											\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$41,667	\$500,000	\$500,000	\$249,297					
	Question 1	O&M Costs included in 2021 Test Year (MN Rate Case) -Distribution											\$140,359	\$140,359	\$140,359	\$140,359	\$140,359	\$140,359	\$140,359	\$1,684,302	\$1,684,302	\$695,820					
	Question 2	Actual O&M Spend Through February- Transmission											\$70,891	\$26,462						\$97,353	\$97,353	\$40,219					
	Question 2	Actual O&M Spend Through February -Distribution											\$253,610	\$253,753						\$507,363	\$507,363	\$209,602					
	49.859% D2 Factor - Transmission Demand																										
	41.312% D4 Factor - Distribution Secondary Demand																										
1e	Building Maintenance																										
	Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)											\$90,000	\$92,000	\$180,000	\$144,000	\$120,000	\$119,000	\$115,000	\$100,000	\$50,000	\$105,000	\$108,000	\$100,000	\$1,323,000	\$1,323,000	\$651,162
	Question 1	O&M Costs included in 2021 Test Year (MN Rate Case)											\$0	\$3,000	\$0	\$20,000	\$47,100	\$2,000	\$22,000	\$11,000	\$0	\$0	\$0	\$0	\$105,100	\$105,100	\$51,729
	Question 2	Actual Capital Spend Through February											\$90,000	\$92,000											\$182,000	\$182,000	\$89,578
	Question 2	Actual O&M Spend Through February											\$0	\$3,000											\$3,000	\$3,000	\$1,477
	49.219% P90 Factor - General Plant																										

Project #	O&M and Capital Costs 2015-2020	2015	2016	2017	2018	2019	2020
1a	Ground Line Inspection- O&M	17,118	97,802	103,129	90,481	35,311	106,147
	D4 Factor - Distribution Secondary Demand- MN Share	6,886	40,346	43,011	37,902	14,282	42,933
1b	Acceleration of Community Streetlight Transition from HID to LED - Capital	\$0	\$0	\$0	\$975,766	\$1,524,812	\$3,432,917
	C4 Factor - Street Lighting Factor- MN Share	\$0	\$0	\$0	\$437,820	\$715,967	\$1,611,908
1c	Advanced Distribution Management System-NA	\$0	\$0	\$0	\$0	\$0	\$0
1d	Acceleration of Distribution and Transmission Vegetation Management- O&M- Transmission	\$900,294	\$1,118,190	\$1,258,561	\$1,183,004	\$646,335	\$783,622
	D2 Factor- Transmission Demand- MN Share	\$431,268	\$566,002	\$628,993	\$590,196	\$328,899	\$398,760
1d	Acceleration of Distribution and Transmission Vegetation Management- O&M- Distribution	\$1,208,139	\$2,122,384	\$2,243,200	\$2,602,052	\$2,368,138	\$2,247,193
	D4 Factor - Distribution Secondary Demand- MN Share	\$485,962	\$875,543	\$935,542	\$1,089,980	\$957,832	\$908,914
1e	Building Maintenance - O&M	\$515,845	\$520,812	\$448,771	\$520,261	\$491,738	\$615,788
	P90 Factor - General Plant- MN Share	\$246,508	\$255,967	\$220,554	\$255,685	\$241,676	\$302,642
1e	Building Maintenance - Capital	\$112,500	\$435,577	\$991,922	\$1,782,171	\$1,492,015	\$1,093,911
	P90 Factor - General Plant- MN Share	\$53,761	\$214,076	\$487,492	\$875,858	\$733,283	\$537,627
*	D4 Factor - Distribution Secondary Demand	40.224%	41.253%	41.706%	41.889%	40.447%	40.447%
	C4 Factor - Street Lighting Factor	45.548%	45.300%	45.141%	44.869%	46.954%	46.954%
	D2 Factor- Transmission Demand	47.903%	50.618%	49.977%	49.890%	50.887%	50.887%
	P90 Factor - General Plant	47.787%	49.148%	49.146%	49.146%	49.147%	49.147%

* MN Jurisdictional Factors from each year's respective annual normalized MJAR
All O&M and Capital costs are 100% OTP Share

OTTER TAIL POWER COMPANY

Docket No: E017-GR-20-719

Response to: MN Office of the Attorney General

Analyst: Peter Scholtz

Date Received: March 05, 2021

Date Due: March 17, 2021

Date of Response: March 17, 2021

Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:**Reference: Tommerdahl Direct at 27-28.**

1. Provide a timeline of the System Infrastructure and Reliability Improvement (SIRI) projects by month for each of the following:
 - a. Transmission line replacement projects
 - b. Cutout failure replacement projects
 - c. Underground replacement programs
 - d. Distribution substation replacement programs
 - e. Distribution line replacement programs
2. Provide the amount of O&M costs and capital costs included in the Test Year, and by month, for each of the projects listed in question #1 above. Indicate which costs are ongoing and which costs are for one-time projects.
3. If the projects listed in question #1 above have already started, provide the actual O&M and capital costs separately, and by month, for each project.

Provide the response in Excel format with all formulas intact, and provide the cost by Total Amount, OTP Share, and MN jurisdiction.

Attachments: 1

Attachment 1 to IR MN-OAG-1053.xlsx

Response:

1. Attachment 1 to IR MN-OAG-1053 shows the budgeted spend for the SIRI project categories requested.
2. Each of the projects shown in Attachment 1 are capital costs. We do not break down O&M costs by project asset but rather have the information from a company standpoint based on FERC accounting codes.
3. See Attachment 1 to IR MN-OAG-1053.

2021 Test Year																MVA Jurisdiction Using D2 or D4 Factor	
		January	February	March	April	May	June	July	August	September	October	November	December	Total Amount	OTP Share 100%		
a.	Transmission Line Replacements																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$307,960	\$307,960	\$307,960	\$769,900	\$1,154,850	\$1,000,870	\$769,900	\$692,910	\$769,900	\$692,910	\$461,940	\$461,940	\$7,699,000	\$7,699,000	\$3,838,678	
Question 2	Actual Capital Spend Through February	\$686,708	\$819,184											\$1,505,892	\$1,505,892	\$750,829	
49.859%	D2 Factor - Transmission Demand																
b.	Cutout Failure Projects																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$10,000	\$10,000	\$10,000	\$25,000	\$37,500	\$32,500	\$25,000	\$22,500	\$25,000	\$22,500	\$15,000	\$15,000	\$250,000	\$250,000	\$103,280	
Question 2	Actual Capital Spend Through February	\$21,848	\$49,410											\$71,258	\$71,258	\$29,438	
41.312%	D4 Factor - Distribution Secondary Demand																
c.	Underground Replacement Projects																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$35,100	\$35,100	\$70,200	\$175,500	\$280,800	\$351,000	\$421,200	\$456,300	\$386,100	\$456,300	\$526,500	\$315,900	\$3,510,000	\$3,510,000	\$1,450,053	
Question 2	Actual Capital Spend Through February	\$72,111	\$94,403											\$166,514	\$166,514	\$68,790	
41.312%	D4 Factor - Distribution Secondary Demand																
d.	Distribution Substation Replacements																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$175,600	\$175,600	\$175,600	\$439,000	\$658,500	\$570,700	\$439,000	\$395,100	\$439,000	\$395,100	\$263,400	\$263,400	\$4,390,000	\$4,390,000	\$1,813,599	
Question 2	Actual Capital Spend Through February	\$518,329	\$272,201											\$790,530	\$790,530	\$326,584	
41.312%	D4 Factor - Distribution Secondary Demand																
e.	Distribution Line Replacements																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$254,410	\$254,410	\$254,410	\$636,026	\$954,039	\$826,834	\$636,026	\$572,423	\$636,026	\$572,423	\$381,615	\$381,615	\$6,360,258	\$6,360,258	\$2,627,553	
Question 2	Actual Capital Spend Through February	\$526,942	\$459,103											\$986,045	\$986,045	\$407,355	
41.312%	D4 Factor - Distribution Secondary Demand																
	Other Replacement Programs																
Question 1	Capital Costs included in 2021 Test Year (MN Rate Case)	\$214,700	\$214,700	\$214,700	\$536,750	\$805,125	\$697,775	\$536,750	\$483,075	\$536,750	\$483,075	\$322,050	\$322,050	\$5,367,500	\$5,367,500	\$2,217,424	
Question 2	Actual Capital Spend Through February	\$0	\$0											\$0	\$0	\$0	
41.312%	D4 Factor - Distribution Secondary Demand																

CERTIFICATE OF SERVICE

**RE: In the Matter of an Inquiry into Utility Investments that May Assist in Minnesota's
Economic Recovery from the COVID-19 Pandemic
Docket No. E017/M-21-201**

I, Tammy Kubela, 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
Reply Comments**

Dated: June 1, 2021

/s/ Tammy Kubela
Tammy Kubela
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8807

[illegible]

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-201_M-21-201
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