

June 16, 2021

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, Minnesota 55101

RE: **Response Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-21-201

Dear Mr. Seuffert,

Attached are the response comments of the Minnesota Department of Commerce, Division of Energy Resources in the following matter:

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

The Department recommends that the Minnesota Public Utilities Commission (Commission) **approve Otter Tail Power Company's petition, with modifications**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/Nancy Campbell
Financial Analyst Coordinator

/s/Gemma Miltich
Financial Analyst, CPA

NC & GM/ar
Attachment



Before the Minnesota Public Utilities Commission

Response Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-21-201

I. BACKGROUND

On May 20, 2020, the Minnesota Public Utilities Commission (Commission) opened an *Inquiry into Utility Investments that May Assist Minnesota's Economic Recovery from the COVID-19 Pandemic*, and issued a *Notice of Reporting Required by Utilities* (Docket No. E,G999/CI-20-492) seeking information from all rate-regulated electric and gas utilities in Minnesota on ongoing, planned, or proposed investment projects that meet the following conditions:

- 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 energy 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.

On June 17, 2020, Otter Tail Power Company (Otter Tail or the Company) made its initial filing in Docket No. E,G999/CI-20-492 and proposed twelve ongoing, planned, or possible projects that, according to the Company, met some of the above-listed criteria set forth by the Commission. On September 15, 2020, Otter Tail submitted a second filing in the same proceeding and reduced the number of its proposed economic recovery projects from twelve to five, because the Company found alternative cost recovery mechanisms through which to charge customers for seven of the twelve projects it had initially proposed.

Otter Tail's third filing in Docket No. E,G999/CI-20-492, submitted on March 3, 2021, further reduced the Company's proposed economic recovery projects from five to three, as the Company found other channels through which to recover the costs of two more of its originally proposed twelve projects. The Commission created a separate docket, Docket No. E017/M-21-201, for the evaluation of Otter Tail's March 3, 2021 filing (Petition). On May 3, 2021, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed initial Comments in Docket No. E017/M-21-201 recommending approval of the Company's Petition, with modifications, and requesting certain additional information from Otter Tail. Otter Tail submitted Reply Comments on June 1, 2021 with the additional information requested by the Department and further discussion on the Company's proposals. The Department provides the instant Response Comments to address Otter Tail's June 1, 2021 Reply Comments and to make our final recommendations on this matter.

II. DEPARTMENT ANALYSIS

The Department reviewed the additional information and considered the discussion provided by Otter Tail in its June 1, 2021 Reply Comments. The Department offers the following response.

A. ADDITIONAL INFORMATION REQUESTED FROM OTTER TAIL

In our May 3, 2021 Comments in the instant docket, the Department requested that Otter Tail provide the following in its Reply Comments:

- 1) An explanation of how its existing System Infrastructure and Reliability Improvement (SIRI) investment schedule would change if the Commission were to approve the SIRI projects/spending proposed in the Company's Petition. Provide, at a minimum, a comparison showing the difference between the existing and proposed SIRI capital expenditures, revenue requirements, and scope of work forecasted for 2022, 2023, and 2024.
- 2) Specific citations or workpapers in Docket No. E017/GR-20-719 that support the amounts included in Department Table 2 of the Department's May 3, 2021 Comments.
- 3) Clarification as to whether the "Total OTP Cost" figures shown in Table 1 of Department Attachment 1 (in the Department's May 3, 2021 Comments) represent the overall Minnesota jurisdictional spending included in Docket No. E017/GR-20-719 for the three proposed projects; if not, please provide the overall Minnesota jurisdictional spending and specific citations included in Docket No. E017/GR-20-719 for the three proposed projects.

In its June 1, 2021 Reply Comments, Otter Tail addressed the Department's requests by providing the following:

- 1) As requested, Table 1 in Otter Tail's Reply Comments shows the SIRI capital expenditures and revenue requirements included in the 2021 test year of the Company's most recent rate case (Docket No. E017/GR-20-719) as well as the amounts forecasted for 2022, 2023, and 2024. The Department's understanding of Otter Tail's 2021 – 2024 SIRI capital expenditures is that, without approval of the Company's current proposal to invest an additional \$10 - \$15 million in SIRI, Otter Tail would incur SIRI capital expenditures at the 2021 test year level, \$27.6 million Total Company (\$12.1 million Minnesota jurisdictional),¹ for each year from 2022 – 2024. Although it is unclear from the data presentation in Table 1 of Otter Tail's Reply Comments, the Department's understanding, based on the record thus far in the instant docket, is that the Company's proposed SIRI investment of \$10 - \$15 million represents the *total* capital expenditure

¹ Otter Tail's June 1, 2021 Reply Comments, page 6.

range proposed, not the *annual* expenditure amount to be incurred each year in 2021 – 2024.

Otter Tail explained on page 6 of its Reply Comments that the pace of certain transmission/distribution facility replacement programs would generally increase over the next several years if the Commission approves the Company's currently proposed \$10 - \$15 million SIRI investment. This broad explanation regarding the anticipated change in the scope of SIRI work that would result from the proposed \$10 - \$15 million in capital spending is nearly identical to that provided on page 7 of Otter Tail's Petition.

- 2) In Attachments 1 and 2 of its Reply Comments, Otter Tail provided its responses to two information requests in the Company's most recent rate case (Docket No. E017/GR-20-719) to show the amounts included in the 2021 test year for each of the three proposed economic recovery projects. The Department notes that parties issued and responded to the referenced rate case information requests after March 3, 2021, when Otter Tail filed the instant Petition. For the proposed accelerated vegetation management and building maintenance projects, the Company makes no reference to workpapers or testimony that it included in its rate case filing. The Department recommends that the Commission adopt the figures contained following table, which we originally included in our May 3, 2021 Comments, to establish the baseline annual revenue requirements against which to evaluate whether Otter Tail has incurred incremental revenue requirements for the proposed economic development projects:

Department Table 2: Revenue Requirements Included in 2021 Test Year in Docket No. E017/GR-20-719 for Otter Tail's Proposed Economic Development Projects

<i>Proposed Project</i>	<i>2021 Test Year Minnesota Revenue Requirement (Docket No. E017/GR-20-719)</i>
System Infrastructure and Reliability Improvement	\$695,000
Acceleration of Distribution and Transmission Vegetation Management	\$945,000
Minnesota Building Maintenance	\$89,000

- 3) On page 8 of its Reply Comments, Otter Tail clarified that the "Total OTP Cost" figures shown in Table 1 of Department Attachment 1 in the Department's May 3, 2021 Comments represent the Total Company, not Minnesota jurisdictional, spending included in the 2021 test year for the three proposed projects. Item 2) in this list discusses the Company's rate case references for the proposed projects' Minnesota jurisdictional amounts included in the 2021 test year.

B. FUTURE REPORTING

On page 2 of its June 1, 2021 Reply Comments, Otter Tail agreed to submit an annual compliance filing that reports the information recommended by the Department for monitoring the progress and results of the Company's three proposed economic recovery projects. The Department continues to recommend that the Commission require Otter Tail to submit annual compliance filings with the information listed on page 14 of the Department's May 3, 2021 Comments. We include the details of this recommendation in the final section of the instant Response Comments.

C. DEFERRED ACCOUNTING

Otter Tail requests that the Commission authorize the Company to use deferred accounting to accrue and track the costs associated with the three proposed projects until Otter Tail requests recovery of these investments in conjunction with a future rate case. In response to a Department information request, Otter Tail indicated that, in addition to capital expenditures, it is proposing to include the following items in the Company's proposed deferred accounting accrual:

- A return on the capital portion of the proposed projects, using the Company's cost of capital (cost of debt and equity).
- The Allowance for Funds Used During Construction (AFUDC) associated with the proposed projects, up until the Company places the projects into service.
- Depreciation expense associated with the proposed projects, after they are in-service.
- Operating & Maintenance (O&M) expenses approved in this docket.²

The Department recommended in our May 3, 2021 Comments that, if the Commission approves the Company's proposed projects and grants the Company's corresponding deferred accounting request, it place the following limitations on the deferred accounting authorization:

- Only the capital costs and allowance for funds used during construction that are directly tied to the approved projects may be accrued in the deferred account.
- Only the project revenue requirements that are incremental to those approved in the Company's rate case proceeding in Docket No. E017/GR-20-719 will be considered eligible to be reviewed for eventual recovery.
- Otter Tail may not accrue in the deferred account a return on its capital expenditures for the approved projects.
- Otter Tail may not defer depreciation expense or other O&M expenses associated with the approved capital projects. However, the Company may defer the O&M expenses approved for the proposed vegetation management acceleration.

On pages 3 – 4 of its Reply Comments, Otter Tail argued that the Department's proposed restrictions on the Company's deferred accounting request would prevent Otter Tail from moving forward with the

² Department Attachment 2 of the Department's May 3, 2021 Comments.

proposed SIRI and building maintenance investments. Otter Tail explained that the Department's recommended restrictions would disallow too much of the potential future cost recovery available to the Company through its deferral of the proposed project costs. The Department appreciates the Company's position and concerns, and we offer the following compromise, which modifies the language of the last point in the bulleted list immediately preceding the current paragraph:

- Otter Tail may defer the depreciation expense, but not other O&M expenses, associated with the SIRI and building maintenance capital projects. When and if Otter Tail requests cost recovery of the deferred depreciation expense associated with the SIRI and building maintenance investments, the Company must also propose a reasonable amortization period over which to recover the expense as well as a sunset date at which the recovery will end. The Company may defer the O&M expenses approved for the proposed vegetation management acceleration.

Although the Company's base rates already include a representative level of depreciation and other O&M expenses, and although increases or decreases in these expenses that occur outside a rate case should, in general, not be deferred (especially deferrals tracking solely the increases in costs), the Department concedes that allowing Otter Tail to defer depreciation expense for the proposed SIRI and building maintenance investments may be reasonable for the purpose of the instant docket. The Department maintains that deferring depreciation and other O&M expenses undermines the ratemaking process by allowing the Company to simultaneously recover representative levels of these expenses through base rates (regardless of whether actual expenses are higher or lower) and track a portion of the expenses through a deferral for future dollar-for-dollar recovery. However, unlike other O&M expenses, depreciation expense can be easily tied directly to and tracked for a specific capital investment, and, for this reason, the Department is retracting its prior objection to Otter Tail's request to defer the depreciation expense associated with the proposed SIRI and building maintenance investments for purposes of this Covid-related docket. Additionally, a reasonable amortization period and sunset date will help to mitigate over recovery concerns for depreciation expense. Also, consistent with our May 3, 2021 Comments, the Department's recommendations accommodate deferral of the Company's proposed vegetation management spending, which falls entirely under O&M expense.

The Department also notes that in past deferred accounting requests, the Commission has not allowed utilities to accrue a return or carrying amount on these costs. The Commission has agreed with the Department that returns/carrying costs should not be allowed for deferred accounting purposes, as ordered in Point 4 of the Commission's November 4, 2020 *Order* in Docket Nos. E,G999/CI-20-425 and E,G999/M-20-427. Therefore, we continue to recommend that the Commission not allow Otter Tail to accrue in the deferral a return on the capital expenditures for the approved projects.

IV. DEPARTMENT RECOMMENDATIONS

The Department continues to conclude that Otter Tail's proposed economic recovery projects and the Company's corresponding request for deferred accounting are generally reasonable, with the revised modifications proposed by the Department in the instant Response Comments. We recommend that the Commission take the following actions:

- Approve Otter Tail's proposed acceleration of the Company's System Infrastructure and Reliability Improvement program, vegetation management, and building maintenance investments, with the following spending caps (Department Table 1 from the Department's May 3, 2021 Comments is included on the next page for ease of reference):

Department Table 1: Estimated Cost of Otter Tail's Three Proposed Economic Recovery Projects

<i>Proposed Project</i>	<i>Estimated Cost</i>
System Infrastructure and Reliability Improvement	\$10 - \$15 million
Acceleration of Distribution and Transmission Vegetation Management	\$4.52 million
Minnesota Building Maintenance	\$11.37 million

- Adopt the figures contained in the following Department Table 2, originally included in the Department's May 3, 2021 Comments, to establish the baseline annual revenue requirements against which to evaluate whether Otter Tail has incurred incremental revenue requirements for the proposed economic development projects:

Department Table 2: Revenue Requirements Included in 2021 Test Year in Docket No. E017/GR-20-719 for Otter Tail's Proposed Economic Development Projects

<i>Proposed Project</i>	<i>2021 Test Year Minnesota Revenue Requirement (Docket No. E017/GR-20-719)</i>
System Infrastructure and Reliability Improvement	\$695,000
Acceleration of Distribution and Transmission Vegetation Management	\$945,000
Minnesota Building Maintenance	\$89,000

- Require the Company to submit annual compliance filings with the following information for each of approved economic recovery project:
 - A comparison showing the amount of capital costs and non-capital expenses incurred versus the amount budgeted; costs/expenses should 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 should include an analysis showing whether and to what extent this incremental vegetation management activity contributed to improved reliability. For the building maintenance investments, Otter Tail should include an analysis showing whether and to what extent its response time to power outages has improved. For the SIRI investments, Otter Tail should include an analysis of any relevant metrics that demonstrate that its system reliability has measurably improved.
- If the Commission approves the Company's proposed projects and grants the Company's corresponding deferred accounting request, we recommend the Commission place the following limitations on the deferred accounting authorization:
 - Only the capital costs and allowance for funds used during construction that are directly tied to the approved projects may be accrued in the deferred account.
 - Only the project revenue requirements that are incremental to those approved in the Company's rate case proceeding in Docket No. E017/GR-20-719 (see Department Table 2 on the previous page) will be considered eligible to be reviewed for eventual recovery.
 - Otter Tail may not accrue in the deferred account a return on its capital expenditures for the approved projects.
 - Otter Tail may defer the depreciation expense, but not other O&M expenses, associated with the SIRI and building maintenance capital projects. When and if Otter Tail requests cost recovery of the deferred depreciation expense associated with the SIRI and building maintenance investments, the Company must also propose a reasonable amortization period over which to recover the expense as well as a sunset date at which the recovery will end. The Company may defer the O&M expenses approved for the proposed vegetation management acceleration.

/ar

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Response Comments**

Docket No. E017/M-21-201

Dated this 16th day of June 2021

/s/Sharon Ferguson

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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-201_M-21-201
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