215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)

April 1, 2021

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

**RE: In the Matter of Otter Tail Power Company 2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2021**
**Docket No. E017/M-21-**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits the enclosed Annual Report pursuant to Minn. Rules 7826.0400, 7826.0500, and 7826.1300. This Annual Report presents our safety, reliability, and service quality performance for the year 2020 and proposed reliability standards for 2021 pursuant to Minn. Rule 7826.0600. Otter Tail's proposed reliability standards for 2021 are found in Section IV, B, in the attached Annual Report and Petition.

Otter Tail has electronically filed this document with the Commission. In compliance with Minn. Rule 7829.1300, subp. 2, Otter Tail is serving a copy of this filing on the Department of Commerce – Division of Energy Resources and Office of Attorney General – Residential Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's General Service list. A Certificate of Service is also enclosed.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8699 or email me at wolson@otpco.com.

Sincerely,

/s/ *WENDI OLSON*
Wendi Olson
Regulatory Compliance Specialist

cjh
Enclosures
By electronic filing
c: Service List

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

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| | |
|---|---|
| In the Matter of Otter Tail Power Company's 2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2021 | Docket No. E017/M-21-<br><br>**SUMMARY OF FILING** |

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Please take notice that on April 1, 2021, Otter Tail Power Company (Otter Tail), filed with the Minnesota Public Utilities Commission its annual Safety, Reliability and Service Quality Report for 2020 pursuant to Minnesota Rules 7826.0400, 7826.0500 and 7826.1300. Pursuant to Minnesota Rule 7826.0600, subp. 1, Otter Tail proposes SAIFI, SAIDI and CAIDI reliability standards for 2021.

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

| | |
|---|---|
| In the Matter of Otter Tail Power Company's 2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Standards for 2021 | Docket No. E017/M-21-<br><br>**ANNUAL REPORT AND PETITION** |

# I. INTRODUCTION

Otter Tail Power Company (Otter Tail or the Company), submits this filing in compliance with Minnesota Rules 7826.0400, 7826.0500, 7826.0600, subp. 1, and 7826.1300. This filing also includes compliance items from previous Minnesota Public Utilities Commission (Commission) Orders.

# II. GENERAL FILING INFORMATION

Pursuant to Minnesota Rule 7829.1300, subp. 4, Otter Tail provides the following general information.

**A. Name, Address, and Telephone Number of Utility**

Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8200

**B. Name, Address, and Telephone Number of Utility Attorney**

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8956

### C. Date of Filing and Effective Date

This Report is being filed on April 1, 2021. The proposed reliability standards will be effective for the calendar year 2021.

### D. Title of Utility Employee Responsible for Filing

Wendi Olson
Regulatory Compliance Specialist
Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8699

## III. MISCELLANEOUS INFORMATION

### A. Service on Other Parties

Pursuant to Minnesota Rule 7829.1300, subp. 2 and Minnesota Statute §216.17, subd. 3, Otter Tail has electronically filed this Report and Proposed 2021 Reliability Standards. A summary of the filing has been served on all parties on the attached service list.

### B. Summary of Filing

A one-paragraph summary of the Report is attached pursuant to Minnesota Rule 7829.1300, subp. 1.

## IV. DESCRIPTION AND PURPOSE OF FILING

### A. Annual Reporting

Minnesota Rules 7826.0400, 7826.0500 and 7826.1300 require electric utilities to file reports on safety, reliability, and service quality performance for the prior year. Otter Tail's 2020 Safety, Reliability, and Service Quality Report is attached.

### B. Proposed reliability standards for 2021

Minnesota Rules 7826.0600 subp. 1, requires electric utilities to propose reliability performance standards for each of its work centers. The rule requires the performance standards be filed on or before April 1 of each year. The utility is to propose standards for the following reliability indices:

1. System average interruption duration index or SAIDI
2. System average interruption frequency index or SAIFI
3. Customer average interruption duration index or CAIDI

In compliance with Minnesota Rules 7826.0600 Subpart 1, Otter Tail includes proposed 2020 reliability performance standards for each of Otter Tail's work centers. As ordered in **Docket No. E017/M-15-322 dated August 14, 2015**, Otter Tail's reliability standards have been frozen at 2013 levels until the Company has shown sufficient improvement in indices' performance. Otter Tail proposes to make a change from six service centers to four service centers for its 2021 report. Minnesota customers served by the Wahpeton and Milbank customer service centers will be included in Fergus Falls and Morris customer service centers' (respectively) analysis.

Otter Tail also proposes to set indices' standards at IEEE's Reliability Benchmark Survey median values for medium sized utilities. This report historically is completed, and results posted, the third quarter of the following year. Otter Tail will provide a supplemental filing within 30 days from when IEEE's 2020 Benchmark Reliability Survey results are completed and provide explanations for standards not met.

## V. CONCLUSION

Otter Tail appreciates the opportunity to provide this Safety, Reliability, and Service Quality Report for 2020, and requests Commission approval of our proposed reliability standards for 2021.

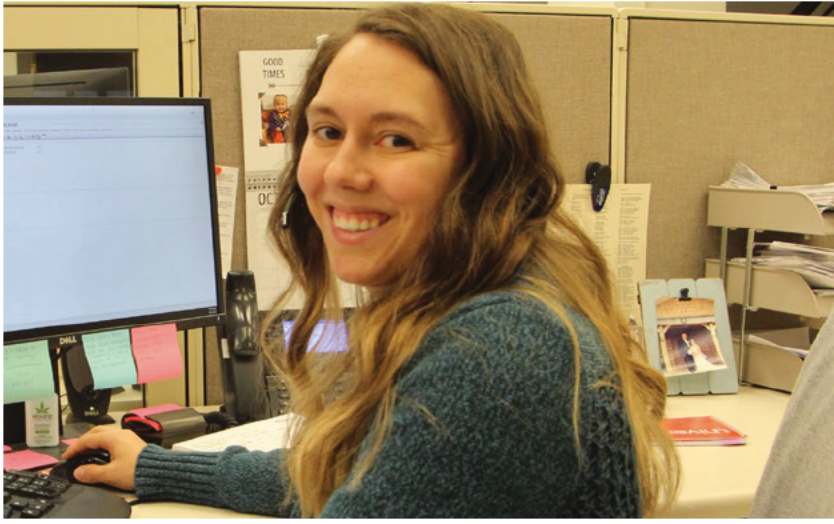
Date: April 1, 2021

Respectfully submitted,

By: */s/ WENDI OLSON*

Wendi Olson
Regulatory Compliance Specialist
Otter Tail Power Company
215 South Cascade St., PO Box 496
Fergus Falls, MN 56537
(218) 739-8699

APRIL 1, 2021



# Safety, Reliability, and Service Quality Report for 2020

## Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2021

*Including Additional Compliance Obligations*

OTTER TAIL POWER COMPANY

# TABLE OF CONTENTS

# I. EXECUTIVE MANAGEMENT'S VIEW OF RELIABILITY

**This section provides the view of Otter Tail's executive management towards reliability and customer satisfaction.**

Otter Tail Power Company (Otter Tail or the Company) is committed to providing quality and reliable service for the rural communities we serve. Reliability at Otter Tail continues to be best summarized in the Company's mission statement:

*"To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business."*

Otter Tail provides electricity to approximately 132,500 customers in 422 communities and rural areas in western Minnesota, northeastern South Dakota, and the eastern two-thirds of North Dakota. The average population of the communities we serve is approximately 400, and over one-half of the communities we serve have populations of fewer than 200. Only three of our communities have populations exceeding 10,000: Fergus Falls, Minnesota (pop. 13,138), Bemidji, Minnesota (pop. 13,431), and Jamestown, North Dakota (pop. 15,427). We operate nine Customer Service Centers (CSCs) and are committed to proactive efforts of communicating, investigating, and resolving reliability issues across our approximately 70,000 square-mile - roughly the size of North Dakota - service territory.

The integrity of Otter Tail's entire transmission and distribution system is directly related to interruption frequency; thus, the accountability lies within our Asset Management area. Otter Tail's Asset Management area is accountable for the planning, engineering and design, execution, operation and on-going maintenance and reliability oversight to ensure that we provide reliable and affordable electric service to our customers. At Otter Tail, we employ a system of Key Performance Indicators (KPIs), for the purpose of providing additional focus on achievement in particular areas of our operations. Two of Asset Management's KPIs are reliability indices dealing with interruption frequency: the Momentary Average Interruption Frequency Index (MAIFI) and System Average Interruption Frequency Index (SAIFI).

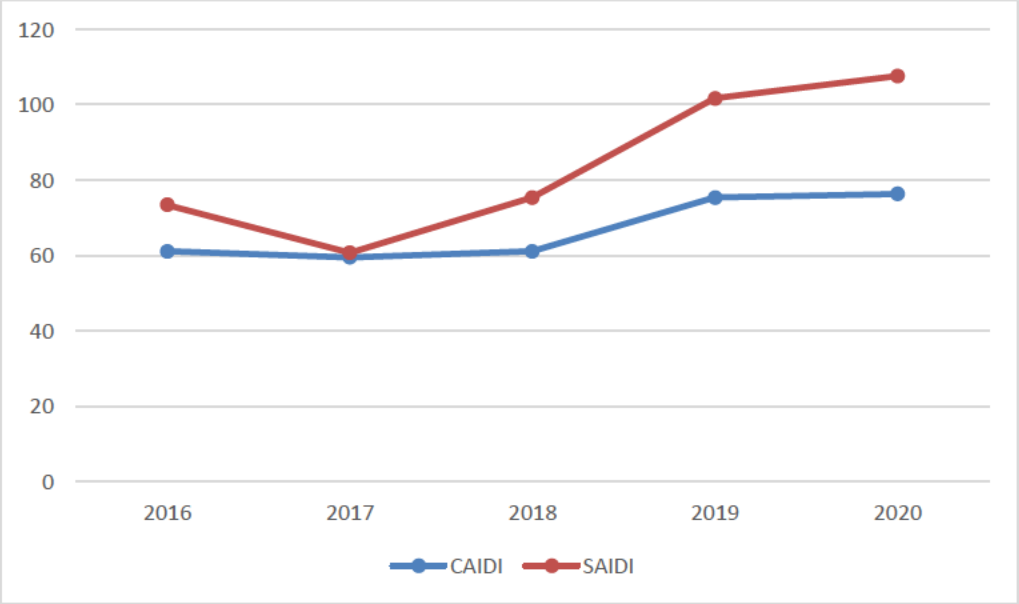
Otter Tail's Customer Service area is accountable for responding to all interruptions. Thus, Otter Tail's Customer Service area is accountable for the cost effective and efficient deployment of field personnel, trucks, and equipment as quickly and safely as possible, necessary for restoring service to customers when interruptions occur. One of the Customer Service area's KPIs is Customer Average Interruption Duration Index (CAIDI.) Additionally, the Reliability indices, SAIDI, SAIFI, CAIDI, and MAIFI are companywide KPI's. These indices are communicated and reviewed with all impacted employees, on a monthly basis, with the expectation that all employees remain cognizant of our company's reliability performance.

The Asset Management and Customer Service areas have a common goal, which is to improve the overall system reliability. Each area recognizes the overall system improvement cannot be accomplished without collaboratively working with the other area. Each area also recognizes system reliability improvements are based on cost effective decisions and overall system improvements over longer periods of time.

## II. 2020 SUMMARY GRAPHS

**As included in previous reports, Otter Tail provides a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability. Figure 1** through **Figure 5** below provides a summary of Otter Tail's overall reliability and service quality for the years 2016 through 2020. It should also be noted that Otter Tail moved from an outdated/obsolete reporting system to a new Interruption Monitoring System (IMS) in 2019. With this change, more granular SAIDI, CAIDI, and SAIFI information is captured. Thus, comparison of 2019 data to historical data should not be considered like for like.

**Figure 1 - Historic Minnesota SAIDI and CAIDI**




Otter Tail saw performance levels increase for SAIDI and a slight increase for CAIDI for 2020 compared to 2019 results.

**Figure 2 - Minnesota Historic SAIFI**

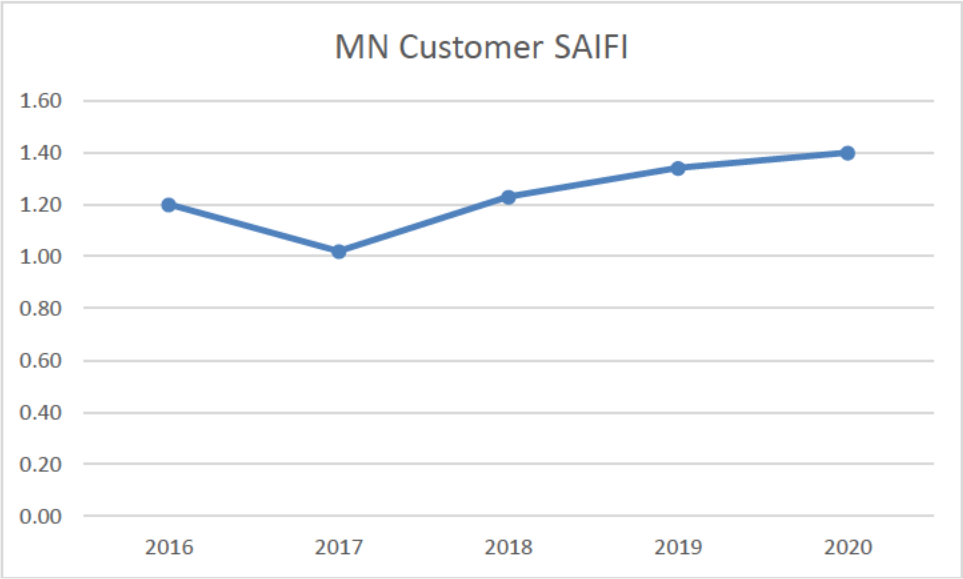



**Figure 3 – Minnesota Historic MAIFI**

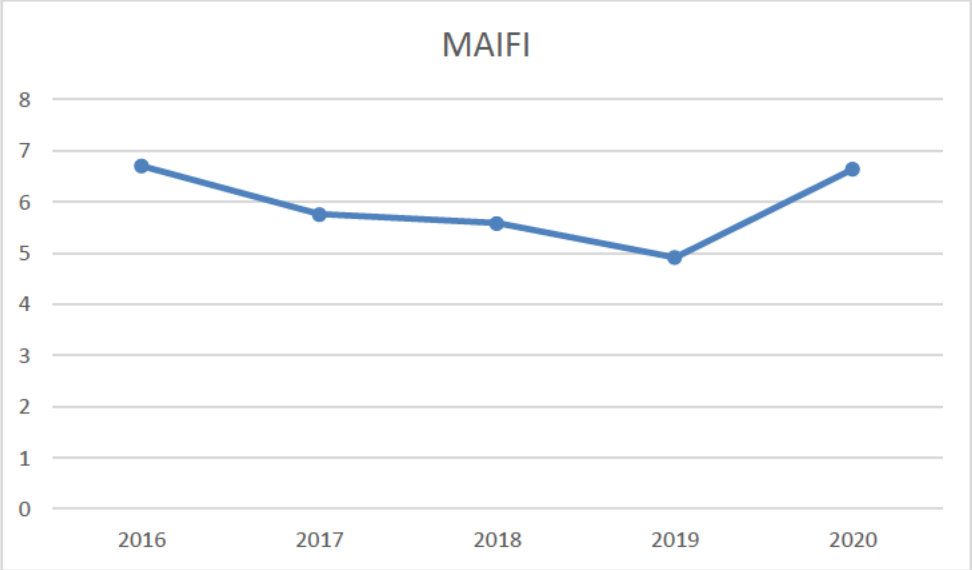


**Table 1**
**MAIFI by Customer Service Center, normalized and non-normalized**

| CSC 2020 | MAIFI |
|---|---|
| **Bemidji** | 4.99 |
| **Crookston** | 7.3 |
| **Fergus Falls** | 7.65 |
| **Milbank** | 8.48 |
| **Morris** | 5.76 |
| **Wahpeton** | 2.35 |
| **MN Total** | 6.64 |

MAIFI is the momentary average interruption frequency index. It is an indication of the average number of momentary interruptions the average customer received over the course of a year, for a particular region. Otter Tail views MAIFI as a leading indicator for future SAIDI and thus tracks and analyzes line sections with excessive momentary interruptions for future capital improvements or possible vegetation management needs. Overall, Otter Tail saw an increase in 2020 results when compared to 2019.

**Figure 4 – Full Time Lineworkers available for trouble calls and for the operation and maintenance of Minnesota distribution lines**

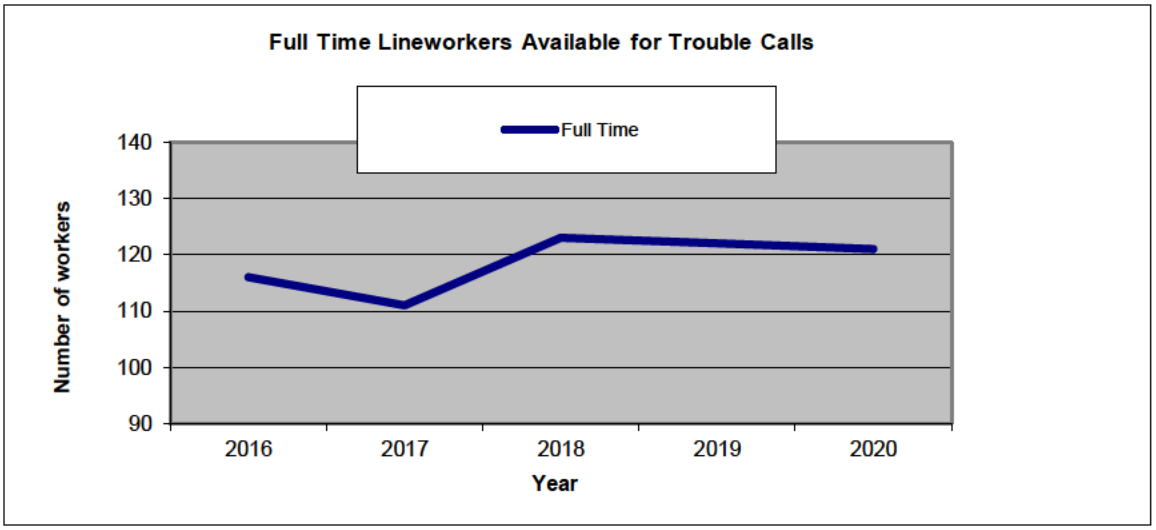
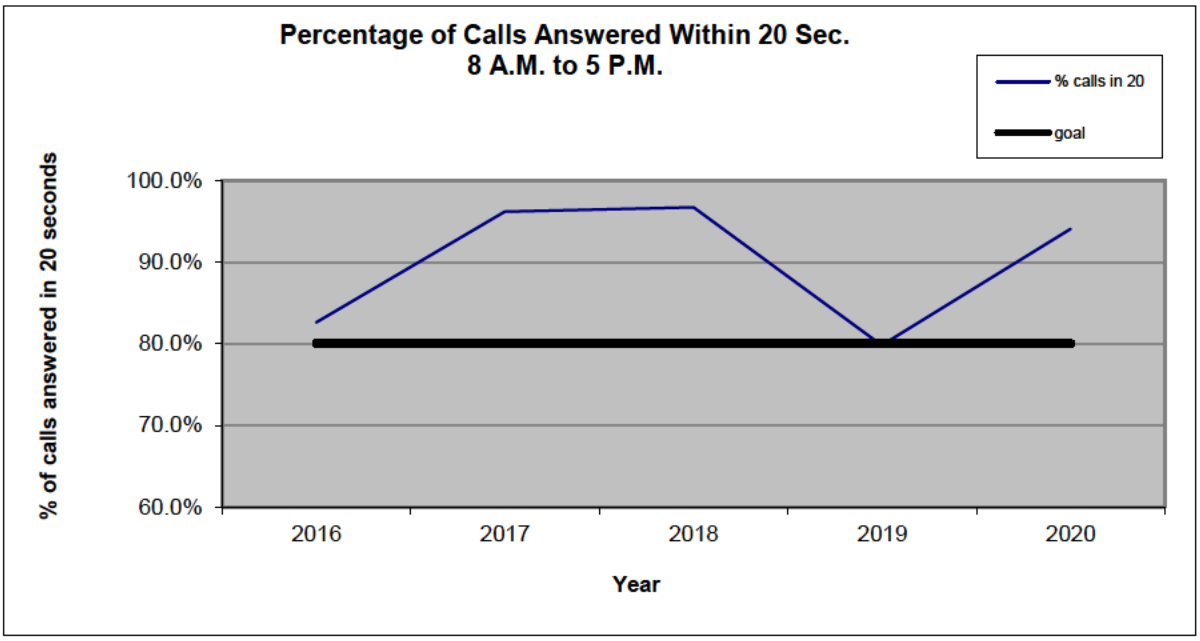


**Figure 5 - Calls Answered within 20 Seconds**



# III. ANNUAL SAFETY REPORT 7826.0400

**Pursuant to Minnesota Rule 7826.0400, ANNUAL SAFETY REPORT, each utility shall file a report on its safety performance during the last calendar year. This report shall include the following information.**

**A. Summary of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the 2020 Calendar year.**

**Table 2**

| **NUMBER OF CASES** | | | |
|---|---|---|---|
| Total number of deaths | Total number of cases with days away from work | Total number of cases with job transfer or restriction | Total number of other recordable cases |
| 0 | 2 | 6 | 1 |
| **NUMBER OF DAYS** | | | |
| Total number of days of job transfer or restriction | | Total number of days away from work | |
| 451 | | 17 | |
| **INJURY AND ILLNESS TYPES** | | | |
| Injuries | Skin disorders | Respiratory conditions | Poisonings | All other illnesses |
| 09 | 0 | 0 | 0 | 0 |

When an injury or illness involves one or more days away from work, you must record the injury or illness on the OSHA 300 Log with a check mark in the space for cases involving days away and an entry of the number of calendar days away from work in the number of days column. The number of cases with job transfers or restrictions safety metric employers determine how many workplace injuries and illnesses required employees to miss work, perform restricted work activities or transfer to another job within a calendar year. The number of other recordable cases describes the work-related injury of illness that does not involve death, days away from work, or days of restricted work or job transfer, and where the employee receives medical treatment beyond first aid. The total number of days away from work shows the total number of calendar days away from work for all work-related injuries and illnesses.

**B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electric system failures and all remedial action taken as a result of any injuries or property damage described, are shown in Table 3.**

**Table 3**

| ANNUAL SAFETY REPORT | | | | |
|---|---|---|---|---|
| **Date** | **Cause** | **Type** | **Action Taken** | **Expense** |
| | | | | |
| | | | | |
| | | | | |
| *There were no instances of personal injury due to system failures in 2020.* | | | | |

# IV. RELIABILITY REPORTING REQUIREMENTS 7826.0500

**Subpart 1. Annual reporting requirements.** On or before April 1 of each year, each utility shall file on its reliability performance during the last calendar year.

## A – D. REPORT OF OTTER TAIL'S SAIDI, SAIFI, AND CAIDI FOR 2020 AND STORM NORMALIZATION OF RELIABILITY DATA

**Minnesota Rule 7826.0500, Subparts 1a, 1b, 1c, and 1d requires the utility to file a report on its SAIDI, SAIFI and CAIDI for the calendar year, by work center and for its assigned service area as a whole. Additionally, this rule requires the utility to provide an explanation of how the utility normalized its reliability data to account for major storms.**

In 2016, Otter Tail selected Itron to replace Otter Tail's end of life interruption monitoring system with a new Interruption Monitoring System (IMS), including working with Itron to incorporate the IEEE 2.5 beta method process to normalize reliability data. System installations began in early 2017, with completion in late 2018. 2019 was the first entire year with the new IMS. Otter Tail's 2.5 Beta process is based on the following assumptions:

- Itron calculates annual system $T_{med}$ (SAIDI/Day threshold) based on all historic data available. The system will utilize five years of data, once the system has achieved that maturity.
- The system $T_{med}$ is utilized to run our indices for Minnesota and individual Minnesota Customer Service Centers (CSCs).

For 2020 data, the 2.5 beta parameter assumptions were as follows:

**2.5 Beta Parameters:**

| Alpha | Beta | Major Event Day |
|---|---|---|
| -2.53 | 2.35 | 28.13 |

After applying 2.5 Beta Parameters for 2020, zero days met the criteria to be considered a Major Event Day (MED or med). It is Otter Tail's belief that due to the small historic data base available in our new IMS, the MED threshold will be artificially high. In 2018, Otter Tail realized a MED on June 29, due to severe weather. That day accumulated 20 minutes of SAIDI due to the event. With a small historic data base to calculate $T_{med}$, the events of that day raised the bar based on the 2.5 Beta calculation process. It will take more data to lower our threshold levels to applicable values.

**Table 4** shows Otter Tail's 2020 SAIFI, CAIDI and SAIDI results based on the IEEE 2.5 Beta Method for each CSC and the entire Minnesota system. **2020 results were gathered by our new Interruption Monitoring System which captures more customer minutes and sustained customer interruptions.**

The goals used for 2020 are the standards that were established in 2013, consistent with the previous seven years, as set by the Commission until sufficient improvement in results are realized. Based on Otter Tail's 2020 standards **we met 11 percent of our CSC targets in 2020, compared to 22 percent in 2019, however Bemidji SAIFI actual was 1/100th of an interruption from goal.**

**Table 4**

**2.5 Beta**

| CSC | 2020 | SAIFI | SAIDI | CAIDI |
|---|---|---|---|---|
| Bemidji | OES Goal | 1.26 | 70.64 | 56.06 |
| | Actual | 1.27 | 55.48 | 49.22 |
| Crookston | OES Goal | 1.19 | 69.33 | 58.26 |
| | Actual | 1.5 | 140.47 | 93.63 |
| Fergus Falls | OES Goal | 1.11 | 66.97 | 60.33 |
| | Actual | 1.42 | 110.48 | 77.57 |
| Milbank | OES Goal | 1.82 | 75.49 | 41.48 |
| | Actual | 2 | 169.89 | 84.94 |
| Morris | OES Goal | 1.01 | 55.78 | 55.23 |
| | Actual | 1.39 | 118.19 | 84.71 |
| Wahpeton | OES Goal | 1.13 | 57.24 | 50.65 |
| | Actual | 4.33 | 329.5 | 76.04 |
| MN Total | OES Goal | 1.13 | 64.95 | 57.48 |
| | Actual | 1.4 | 107.66 | 76.72 |

**Table 4a** shows Otter Tail's 2020 SAIFI, CAIDI and SAIDI non-normalized results for each CSC and the entire Minnesota system. As previously stated, there were no major event days recorded in 2020 from our new IMS.

**Table 4a**

**Non-Normalized**

| CSC | 2020 | SAIFI | SAIDI | CAIDI |
|---|---|---|---|---|
| Bemidji | OES Goal | 1.26 | 70.64 | 56.06 |
| | Actual | 1.27 | 55.48 | 49.22 |
| Crookston | OES Goal | 1.19 | 69.33 | 58.26 |
| | Actual | 1.5 | 140.47 | 93.63 |
| Fergus Falls | OES Goal | 1.11 | 66.97 | 60.33 |
| | Actual | 1.42 | 110.48 | 77.57 |
| Milbank | OES Goal | 1.82 | 75.49 | 41.48 |
| | Actual | 2 | 169.89 | 84.94 |
| Morris | OES Goal | 1.01 | 55.78 | 55.23 |
| | Actual | 1.39 | 118.19 | 84.71 |
| Wahpeton | OES Goal | 1.13 | 57.24 | 50.65 |
| | Actual | 4.33 | 329.5 | 76.04 |
| MN Total | OES Goal | 1.13 | 64.95 | 57.48 |
| | Actual | 1.4 | 107.66 | 76.72 |

Below, Otter Tail provides a description of events that had the greatest impact on normalized SAIDI, SAIFI and CAIDI indices in 2020.

**Otter Tail's 2020 SAIDI standards –** In 2020, the Crookston, Fergus Falls, Milbank, Morris, and Wahpeton Customer Service Centers failed to meet the 2020 SAIDI reliability standards.

**Crookston CSC**: The Crookston CSC experienced 166 sustained interruptions in 2020, resulting in a SAIDI of 140.47 minutes compared to the goal of 69.33. The greatest impact to the SAIDI results in the Crookston CSC was an interruption lasting 2 hours and 20 minutes impacting 834 customers, on the Crookston Barrette Street South Feeder. On April 2, freezing rain and high winds broke a pole and damaged insulators on transmission lines, causing the interruption to the Barrette Street Distribution Sub.

**Fergus Falls CSC:** The Fergus Falls CSC experienced 127 sustained interruptions in 2020, resulting in a SAIDI of 110.48 minutes compared to the goal of 66.97. The greatest impact to SAIDI results in the Fergus Falls CSC was an interruption lasting 2 hours and 39 minutes, impacting 687 customers on the Fergus Edgetown Buse Express Feeder. On July 8, severe thunderstorms broke off two poles and damaged several cross arms near the city land fill. This caused severe damage to the conductor adding to restoration times. During the same event, a large oak tree, outside the right away/franchise, in another location, came down into the line causing several broken crossarms, damaged insulators, and conductors. All feeders out of the Edgetown Buse substation were trimmed as part of our vegetation management process in 2019.

**Milbank CSC:** The Minnesota customers served out of the Milbank CSC experienced 2 sustained interruptions in 2020, resulting in a SAIDI of 169.89 minutes compared to the goal of 75.49. The greatest impact to the SAIDI results in the Milbank CSC, impacting Minnesota customers, was due to two separate events, both on the Browns Valley South Feeder. On June 20, lightning struck a transmission pole north of Wilmot, SD, burning the top of it resulting in a 55 minute interruption. On December 23, high winds during a blizzard damaged insulators, again, on the transmission line north of Wilmot, resulting in a 1 hour and 55 minute interruption. Both events impacted 395 customers. This feeder was Milbank's worst performing circuit. An account of circuit improvements is described later in this report, **Minnesota Rule 7826.0500, Subparts 1h.**

**Morris CSC:** The Morris CSC experienced 150 sustained interruptions in 2020, resulting in a SAIDI of 118.19 minutes compared to the goal of 55.78. The greatest impact to SAIDI results in the Morris CSC was an interruption lasting 2 hours and 25 minutes, impacting 1477 customers. On July 26, lightning struck a 115KV transmission pole feeding the Wheaton Substation, interrupting service to both the North and South Feeders. The line was switched to isolate the fault, which included Wheaton, and the pole and other damaged facilities were replaced.

**Wahpeton CSC:** The Minnesota customers served out of the Wahpeton CSC experienced 11 sustained interruptions in 2020, resulting in a SAIDI of 329.5 minutes compared to the goal of 57.24. The greatest impact to the SAIDI results in the Wahpeton CSC was an interruption lasting 4 hours and 14 minutes, impacting 118 Minnesota customers. On September 9, just before midnight, extremely high winds broke several transmission insulators, causing the interruption on the Nashua Tintah Substation. The

line had to be patrolled in the dark, which added to the interruption duration. The Nashua Tintah–Tintah Feeder is Wahpeton's worst performing circuit. An account of circuit improvements is described later in this report, **Minnesota Rule 7826.0500, Subparts 1h.**

**Otter Tail 2020 SAIFI standards –** In 2020, all six Customer Service Centers failed to meet the 2020 SAIFI reliability standards.

**Bemidji CSC:** The Bemidji CSC experienced 57 sustained interruptions in 2020, resulting in a SAIFI of 1.27 interruptions compared to a goal of 1.26.

**Crookston CSC:** The Crookston CSC experienced 166 sustained interruptions in 2020, resulting in a SAIFI of 1.5 interruptions compared to a goal of 1.19.

**Fergus Falls CSC:** The Fergus Falls CSC experienced 127 sustained interruptions in 2020, resulting in a SAIFI of 1.42 interruptions compared to a goal of 1.11.

**Milbank CSC:** Minnesota customers served out of the Milbank CSC experienced 2 sustained interruptions in 2020, resulting in a SAIFI of 2 interruptions compared to a goal of 1.82.

**Morris CSC:** The Morris CSC experienced 150 sustained interruptions in 2020, resulting in a SAIFI of 1.39 interruptions compared to a goal of 1.01.

**Wahpeton CSC:** Minnesota customers served out of the Wahpeton CSC experienced 11 sustained interruptions in 2020, resulting in a SAIFI of 4.33 interruptions compared to a goal of 1.13.

**Otter Tail 2020 CAIDI standards –** The Crookston, Fergus Falls, Milbank, Morris, and Wahpeton Customer Service Centers failed to meet the 2020 CAIDI reliability standards.

**Crookston CSC:** The Crookston CSC experienced 166 sustained interruptions in 2020, resulting in a CAIDI of 93.63 minutes compared to a goal of 58.26 minutes. The most impactful feeder interruption occurred on August 20 due to a severe thunderstorm with high winds, launching trees into our Kennedy Main Feeder distribution circuit. Causing a 6 hour and 58 minute interruption. This feeder was last trimmed, as part of our vegetation management process, in 2017, and is schedule to trimmed again in 2022, (pursuant to our five year trim cycle). Following this event, the line was patrolled and additional trimming was conducted due to any pre-cycle over growth.

**Fergus Falls CSC:** The Fergus Falls CSC experienced 127 sustained interruptions in 2020, resulting in a CAIDI of 77.57 minutes compared to a goal of 60.33 minutes. The most impactful feeder interruptions occurred on July 8. Severe thunderstorms, with straight line winds, broke off trees into the primary distribution lines on the Aurdal Rural Wall Lake–Aurdal Rural North Feeder causing an interruption lasting just over 7 hours. This event saw combined damage to both transmission and distribution voltages. Damage, to both, was severe and included broken insulators, cutouts, cross arms, and conductors. As part of our vegetation management process, these lines had been trimmed

in 2018. Following this event, the line was patrolled and additional trimming was conducted due to any pre-cycle over growth.

**Milbank CSC:** Minnesota customers served out of the Milbank CSC experienced two sustained interruptions in 2020, resulting in a CAIDI of 84.94 minutes compared to a goal of 41.48 minutes. The most impactful feeder interruption occurred on December 23. Details of this event were documented in the SAIDI analysis portion of this section previously.

Due to regional reorganizations, Milbank CSC now has only two feeders feeding MN customers. Otter Tail proposes that these Minnesota customers be included in the Morris CSC for 2021's report.

**Morris CSC:** The Morris CSC experienced 128 sustained interruptions in 2020, resulting in a CAIDI of 84.71 minutes compared to a goal of 55.23 minutes. The most impactful interruption occurred on August 27. Otter Tail did a planned substation upgrade that resulted in an eight hour and 26 minute interruption on the Herman Main Feeder, impacting 133 customers.

**Wahpeton CSC:** Minnesota customers served out of the Wahpeton CSC experienced 11 sustained interruptions in 2020, resulting in a CAIDI of 76.04 minutes compared to a goal of 50.65 minutes. The most impactful feeder interruption occurred on September 9. Details of this event were documented in the SAIDI analysis portion of this section previously.

Due to regional reorganizations, Wahpeton CSC has only two feeders feeding MN customers. Otter Tail proposes that these Minnesota customers will be included in the Fergus Falls CSC for 2021's report.

**Reliability Standard Summary**

When compared to 2019, Otter Tail's 2020 overall Minnesota reliability performance realized an increase in SAIFI, SAIDI and MAIFI. CAIDI was relatively flat year to year. As described in last year's filing, our new system (first utilized for 2019 recording) captures more interruptions and duration with monitoring meters on all three phases, when compared to our old system. As Otter Tail gathers additional historic data, it will become apparent which appropriate standards and goals to utilize for measuring performance.

Reliable service continues to be one of Otter Tail's top priorities and we are cognizant that ongoing improvements in reliability will continue to happen over time and must be done cost effectively. We believe the continued maturity of our current processes and the application of new technologies and tools will provide improved results.

**Table 5** provides a summary of the different types of interruption causes that affect overall system reliability. As of note, migration into the new IMS has taken place allowing for more cause granularity. Each year we audit cause data to determine additional cause classification to provide better detailed post analysis of our system's performance.

**Table 5**
**2020 MN Sustained Interruption Summary**
**by CSC and cause**

| | Bemidji | Crookston | Fergus Falls | Milbank | Morris | Wahpeton | Work Center Totals |
|---|---|---|---|---|---|---|---|
| Animal | 2 | | 5 | | 1 | | 8 |
| Bird | | | | | | | 0 |
| Equip Fail Arrester | 2 | 5 | 3 | | 2 | | 12 |
| Equip Fail Conductor | | 2 | 2 | | 8 | | 12 |
| Equip Fail Cutout | | | 2 | | 1 | | 3 |
| Equip Fail Insulator | 5 | 42 | 25 | | 17 | 6 | 95 |
| Equip Fail Other | | | | | 3 | | 3 |
| Equip Fail Pole | 2 | | 1 | | 10 | 1 | 14 |
| Equip Fail Substation | 2 | 7 | 11 | | 4 | 2 | 26 |
| Equip Fail Transformer | | | 1 | | 1 | | 2 |
| Equip Fail Underground | | 2 | 2 | | | | 4 |
| Lightning | 1 | | 1 | 1 | 8 | | 11 |
| Other | 1 | | 1 | | | | 2 |
| Planned | 2 | 14 | | | 4 | | 20 |
| Unknown | 1 | 1 | 3 | | 15 | 1 | 21 |
| Vandalism | | 1 | | | | | 1 |
| Vegetation | 1 | | 14 | | 8 | | 23 |
| Vehicle Accident | 2 | 1 | 1 | | 3 | | 7 |
| Weather | 7 | 32 | 9 | | 28 | | 76 |
| Unidentified | 24 | 46 | 28 | 1 | 16 | 1 | 116 |
| **Totals** | **52** | **153** | **109** | **2** | **129** | **11** | **456** |

## E. ACTION PLAN FOR REMEDYING ANY FAILURE TO COMPLY WITH RELIABILITY STANDARDS

**Minnesota Rule 7826.0500, Subpart 1e**, **requires utilities to file an action plan for remedying any failure to comply with reliability standards set forth in part 7826.0600 or an explanation as to why non-compliance was unavoidable under the circumstances.**

In compliance with the Commission's **December 20, 2012 Order in Docket No. E017/M-12-325**, Otter Tail submitted a compliance filing on February 4, 2013 describing Otter Tail's action plans to address not meeting the 2011 reliability standards set by the Commission. In that filing, Otter Tail described several enhanced or new processes adopted by the Company to improve system reliability performance. The following is an update of our action plan:

1. **Customer Service and Asset Management Joint Monthly Team Meetings:** This monthly meeting has replaced our former Reliability Improvement Initiative Team Meetings**.** Otter Tail's Customer Service and Asset Management cross functional team meets monthly for a comprehensive overview of our system's reliability. This process continues to provide increased awareness, focus and attention to reliability related issues through the prioritization of resources. In addition to managers from each of the Customer Service and Asset Management business units, Otter Tail's Vice Presidents of both Customer Service and Asset Management attend these monthly meetings.

2. **Electronic Tracking Process for Transmission Patrol Reports and Maintenance Activities:** Otter Tail continues to improve electronic tracking of internal reports and has integrated the process into our Geographic Information System (GIS). This allows the Company to more effectively schedule and manage maintenance activities based on historic and current maintenance data. This lends itself for a more efficient prioritization of resources. In addition, specific budget dollars are allocated for mitigating identified reliability concerns.

3. **Lightning Tracking System:** Otter Tail implemented a lightning tracking system eight years ago. It tracks lightning activity within Otter Tail's service territory. This tool has been beneficial in identifying remote areas hit by lightning, assisting in follow-up patrols and inspections to identify damaged equipment. In 2019, the integration of the lightning data with our GIS was completed. Now strike data can be tracked in comparison to our asset locations, identifying areas for needed patrol following lightning/storm events.

4. **GIS Data Integration:** Otter Tail continues the integration of critical system data into its GIS. Underground fault data, patrol information, SEL distance relay data, lightning strike location data, and pole inspection data is all integrated into GIS providing an optimized approach to reliability related activities in the future.

5. **Fault Indicator Installations at Transmission Line Junctions:** Otter Tail continues to install and utilize fault indicators on transmission line junctions (line splits). Otter Tail will continue to monitor and investigate the improvements this equipment provides in our abilities to identify fault location detection.

6. **Installation of Remote Real-Time Voltage, Current, and Power Monitors**: In 2014 Otter Tail began installing remote real-time power monitors in the field to assist with investigating interruption events and power quality issues. Today, Otter Tail has 125 of these power quality monitors installed and operating in our system. These tools are located in identified problem areas and then redeployed in other areas once the issues are resolved. Data provided is real-time and displayed via a web browser. Continued deployment of this equipment has improved Otter Tail's efforts in identifying power quality problems and issues in the field.

7. **Installation of Grid Monitoring Power Sensors**: In 2020, Otter Tail purchased and installed 15 sets of medium voltage power sensors for monitoring overhead distribution and 41.6KV transmission circuits. They communicate critical power quality attributes via wireless cellular and data is provided real time via a web browser. In the months ahead Otter Tail will learn about this tools application and use its data for continued system optimization.

This action plan will provide continued contribution towards cost-effective improvement of the Company's overall system reliability. Overall system improvements will be realized over longer periods of time. These improvements will come through new technology, improved efficiencies, disciplined primary cause investigation and analysis, situational awareness, and attention to overall cross-functional accountabilities.

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## F. INTERRUPTION OF BULK POWER SUPPLY FACILITY

**Pursuant to Minnesota Rule 7826.0500, Subpart 1f, to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption.**

For the 2020 calendar year, Otter Tail reports that there was one sustained interruption to a Minnesota Bulk Power Supply Facility. On May 26, 2020 at 2:56 AM, an insulator failed in the GRE Audubon 230KV Substation. Customers in Audubon, Lake Park, Callaway, Hitterdal, and Syre experienced a five minute and 57 second interruption as a result of this.

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## G. REPORTING MAJOR SERVICE INTERRUPTIONS

**Minnesota Rule 7826.0500, Subpart 1g, requires utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions.**

Minnesota Rule 7826.0500, Subpart 1g, requires utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions. On December 18, 2020, the Minnesota Public Utilities Commission issued an order in Docket No. E017/M-20-401 granting a variance to Minnesota Rule 7826.0500, Subpart 1g. Otter Tail provides as required by this variance as Attachment 1, a summary table that includes the information contained in the reports, like Attachment G of Xcel's April 1, 2020 Safety, Reliability, and Service Quality report filing in Docket No. E002/M-20-406.

## H. CIRCUIT INTERRUPTION DATA

**Minnesota Rule 7826.0500, Subparts 1h, requires utilities, to the extent technically feasible, to file circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance.**

In compliance with this rule, **Table 6** shows the worst performing circuit for each of Otter Tail's six CSCs. Last year, Otter Tail changed the criteria for the purpose of identifying the worst performing circuit. In previous years, we defined a circuit as a distribution feeder and the criterion that was used to identify the worst performing circuit was customer minutes. This year, Otter Tail will continue to define a circuit as a distribution feeder and it will again use customer interruptions, both momentary and sustained, as the criteria for identifying worst performers. We are including momentary customer interruptions as conditions due to the fact that we believe this is "forward looking" and that MAIFI is a predictor of future SAIDI. Also, benchmark surveys show that multiple momentary interruptions have a negative impact on customer satisfaction.

**Table 6**
**2020 MN Worst Performing Feeders**

| Service Center | Substation Name | Feeder Description | Customer Count | Total Sustained Customer Minutes | SAIFI | CAIDI | SAIDI | MAIFI |
|---|---|---|---|---|---|---|---|---|
| BEMIDJI | Twin Valley | Main Feeder | 721 | 61681 | 4 | 21.39 | 85.55 | 16 |
| CROOKSTON | Holt Junction | Main Feeder | 305 | 78551 | 2.44 | 105.72 | 257.54 | 15.5 |
| FERGUS FALLS | Otter City | North Feeder | 876 | 72278 | 1 | 82.51 | 82.51 | 26.06 |
| MILBANK | Browns Valley | South Feeder | 322 | 40275 | 1.9 | 84.97 | 161.85 | 7.97 |
| MORRIS | Morris NE | Prairie Inn Feeder | 1058 | 10770.44 | 1 | 10.18 | 10.18 | 9.01 |
| WAHPETON | Nashua Tintah | Tintah Feeder | 67 | 33296 | 6 | 82.83 | 496.95 | 4.03 |

**Bemidji CSC:** The Main Feeder fed from the Twin Valley Substation was the worst performing feeder in 2020 for the Bemidji CSC. This feeder experienced four sustained and 16 momentary interruptions impacting 721 customers in 2020. The causes of momentary interruptions were mainly transmission related and included, animals, birds, weather and unknown. The causes of the sustained interruptions were unknown, weather, and all transmission related.

This feeder was last trimmed in 2016 as part of our vegetation management process. It is scheduled to be trimmed again in 2021. Work was conducted last year on the Fertile transmission breaker which provides service to the Twin Valley Distribution Substation. Several poles were replaced on the transmission system as well. Engineering also began a study, late last year, utilizing our new grid monitoring power sensors which are installed on the transmission system to pinpoint fault locations. Investigations into other proactive maintenance activities continues to improve this feeder's performance in the future.

**Crookston CSC:** The Main Feeder fed from the Holt Junction Substation was the worst performing feeder in 2020 in the Crookston CSC. This feeder experienced two sustained interruptions and 14 momentary interruptions impacting 305 customers in 2020. The causes of momentary interruptions were mainly transmission related and included vegetation and several occurrences of ice on the lines. Both sustained interruptions were due to failed arrestors. One of those, occurring on June 29, lasted just over 4 hours due to the fact that the ground tail of the blown arrestor was oriented in such a way that it was very difficult to locate.

This feeder was last trimmed in 2018 as part of our vegetation management process. It is scheduled to be trimmed again in 2023. As a result of this circuit's 2020 performance, Otter Tail will continue to monitor this feeder to ensure improved results in the future.

**Fergus Falls CSC:** The North Feeder fed out of the Ottertail City Substation was the worst performing feeder in 2020 for the Fergus Falls CSC. This feeder experienced 1 sustained and 27 momentary interruptions, impacting 876 customers in 2020. The causes of the momentary interruptions include, vegetation, animals, weather, and older underground primary. On March 19, an insulator failed on the 41.6KV transmission line between Deer Creek and the Ottertail City Substation resulting in a one hour and 23 minute interruption, impacting 876 customers.

This feeder, which resides in a heavily wooded area was last trimmed in 2020 as part of our vegetation management process. During the summer of 2021, the section of old underground primary will be replaced. A project to replace existing overhead primary with underground is being scoped out and budgeted for 2022. Also, work was done at the Ottertail City Substation to address reliability issues with the transmission breaker during the summer of 2020. Investigations into other proactive maintenance activities continues to improve this feeder's performance in the future.

**Milbank CSC:** The South Feeder fed out of the Browns Valley Substation was the worst performing feeder in 2020 for the Milbank CSC. This feeder experienced two sustained and eight momentary interruptions, impacting 322 customers in 2020. The momentary interruptions were due to weather and birds. Both sustained interruptions were transmission related. On June 20, lightning struck a transmission pole north of Wilmot, burning off the top of the pole, causing a 55 minute interruption. On December 23, high winds in the Wilmot area caused an insulator to fail, resulting in a one hour and 55 minute interruption.

Otter Tail plans to refurbish the transmission line that feeds the Browns Valley Distribution Substation this year. The plans are to replace all old and aging insulators and several poles.

Otter Tail proposes that the Browns Valley Substation will be rolled into the Fergus Falls CSC for 2021 reporting as part of ongoing discussions relating to the 2018 Annual SRSQ January 28, 2020 PUC Order in Docket No. E017/M-19-260.

**Morris CSC:** The Prairie Inn Feeder fed from the Morris NE Substation was the worst performing feeder in 2020 for the Morris CSC. This feeder experienced one sustained and nine momentary interruptions, impacting 1058 customers in 2020. The momentary interruptions were largely transmission related, due to weather, a vehicle accident, and insulator and arrestor failures. The sustained interruption was due to a failed transmission arrestor.

Otter Tail plans to reinsulate both tangent and corner structures in 2021. Arrestors will also be replaced at the same time.

Otter Tail will continue to monitor this feeder to ensure improved results in the future.

This feeder and its supplying transmission circuit will continue to be monitored to ensure improved performance in the future.

**Wahpeton CSC:** The Tintah Feeder fed from the Nashua Tintah Substation was the worst performing feeder in 2020 for the Wahpeton CSC. This feeder experienced six sustained and four momentary interruptions, impacting 67 customers in 2020. The momentary interruptions were due to lightning and bad weather. The sustained interruptions were all transmission related and most of them due to broken insulators.

Otter Tail plans to refurbish the Nashua Tintah transmission tap this year. The plans are to replace all old and aging insulators and several poles on this tap feeding the distribution substations.

Otter Tail proposes that the Nashua Tintah Substation will be rolled into the Fergus Falls CSC for 2021 reporting as part of ongoing discussions relating to the 2018 Annual SRSQ January 28, 2020 PUC Order in Docket No. E017/M-19-260.

## I. REPORT OF NOMINAL ELECTRIC SERVICE VOLTAGES

**Minnesota Rule 7826.0500, Subpart 1i, requires that utilities shall file a report providing data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the stands of the American National Standards Institute for nominal system voltages greater or less than voltage range B.**

Otter Tail provides, in **Table 7** below, the feeders and number of occurrences where the voltage fell outside the ANSI voltage range B. Most of the feeders, with numerous occurrences, are feeders with a single large customer that has a very large load and are mostly pipelines.

**Table 7**
**MN Feeders and Number of Occurrences – Voltage fell outside the ANSI Voltage Range**

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Bemidji CSC | Bejou_MainFeeder | 1 | 3 |
| Bemidji CSC | Bemidji_115_DowntownFeeder | 0 | 52 |
| Bemidji CSC | Bemidji_115_High_SchoolFeeder | 0 | 43 |
| Bemidji CSC | BemidjI_115_South_Lake_IrvingFeeder | 0 | 7 |
| Bemidji CSC | Bemidji_25th_Street_EastFeeder | 0 | 1 |
| Bemidji CSC | Bemidji_Birchmont_NorthFeeder | 34 | 1 |
| Bemidji CSC | Bemidji_Birchmont_SouthFeeder | 0 | 4 |
| Bemidji CSC | Bemidji_Hydro_MainFeeder | 0 | 158 |
| Bemidji CSC | Bemidji_Nymore_East_ExpressFeeder | 0 | 4,303 |
| Bemidji CSC | Bemidji_Potlatch_MainFeeder | 0 | 36 |
| Bemidji CSC | Callaway_MainFeeder | 0 | 81 |
| Bemidji CSC | Cass_Lake_NorthFeeder | 0 | 53 |
| Bemidji CSC | Cass_Lake_SouthFeeder | 1 | 10 |
| Bemidji CSC | Clearbrook_MainFeeder | 0 | 14,554 |
| Bemidji CSC | Clearbrook_MN_Pipeline_MainFeeder | 0 | 56 |
| Bemidji CSC | Erskine_EastFeeder | 0 | 31 |
| Bemidji CSC | Erskine_WestFeeder | 0 | 44 |
| Bemidji CSC | Fertile_NorthFeeder | 1 | 4 |
| Bemidji CSC | Fertile_SouthFeeder | 0 | 5 |
| Bemidji CSC | Gary_MN_MainFeeder | 0 | 58 |
| Bemidji CSC | Gonvick_MainFeeder | 0 | 50 |
| Bemidji CSC | Gully_MainFeeder | 0 | 59 |
| Bemidji CSC | Hitterdal_MainFeeder | 0 | 57 |
| Bemidji CSC | Mahnomen_115_CasinoFeeder | 2 | 0 |
| Bemidji CSC | McIntosh_MainFeeder | 0 | 19 |

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Bemidji CSC | Mentor_MainFeeder | 0 | 4 |
| Bemidji CSC | Ogema_White_Earth_OgemaFeeder | 2 | 17 |
| Bemidji CSC | Ogema_White_Earth_WhiteEarthFeeder | 2 | 20 |
| Bemidji CSC | Oklee_MainFeeder | 1 | 1 |
| Bemidji CSC | Syre_MainFeeder | 0 | 8 |
| Bemidji CSC | Trail_Gravel_Pit_MainFeeder | 2 | 2,222 |
| Bemidji CSC | Trail_MainFeeder | 0 | 2 |
| Bemidji CSC | Twin_Valley_MainFeeder | 0 | 14 |
| Bemidji CSC | Ulen_MainFeeder | 0 | 19 |
| Bemidji CSC | Waubun_MainFeeder | 0 | 16 |
| Bemidji CSC | WiltonMN_MainFeeder | 0 | 1 |
| Bemidji CSC | Winger_MainFeeder | 0 | 583 |
| Crookston CSC | Adams_Milton_AdamsFeeder | 0 | 21 |
| Crookston CSC | Adams_Milton_MiltonFeeder | 41 | 2 |
| Crookston CSC | Argyle_NorthFeeder | 0 | 25 |
| Crookston CSC | Argyle_SouthFeeder | 0 | 5 |
| Crookston CSC | Badger_MainFeeder | 0 | 19 |
| Crookston CSC | Beltrami_and_LockhartFeeder | 2 | 1,209 |
| Crookston CSC | Beltrami_Junction_Beltrami_Rural_EastFeeder | 1 | 2,380 |
| Crookston CSC | Beltrami_Junction_Beltrami_Rural_NorthFeeder | 2 | 2,201 |
| Crookston CSC | Brooks_MainFeeder | 0 | 1 |
| Crookston CSC | Climax_MainFeeder | 0 | 16,148 |
| Crookston CSC | Crookston_Barrette_St_NorthFeeder | 0 | 5 |
| Crookston CSC | Crookston_Barrette_St_SouthFeeder | 3 | 3 |
| Crookston CSC | Crookston_Enbridge_MainFeeder | 2 | 10,598 |
| Crookston CSC | Crookston_Parkview_U_of_M_Feeder | 0 | 8 |
| Crookston CSC | Crookston_Parkview_West_East_and_SouthFeeder | 0 | 14 |
| Crookston CSC | Crookston_South_Main_American_Crystal_SugarFeeder | 0 | 1 |
| Crookston CSC | Crookston_South_Main_CrescentFeeder | 0 | 3 |
| Crookston CSC | Crookston_South_Main_DahlgrensFeeder | 0 | 1 |
| Crookston CSC | Crookston_South_Main_HospitalFeeder | 0 | 1 |
| Crookston CSC | Crookston_South_Main_Industrial_ParkFeeder | 0 | 3 |
| Crookston CSC | Donaldson_MainFeeder | 0 | 4 |
| Crookston CSC | Fisher_MainFeeder | 0 | 28 |
| Crookston CSC | Greenbush_EastFeeder | 0 | 14 |
| Crookston CSC | Greenbush_WestFeeder | 0 | 15 |
| Crookston CSC | Hallock_Northwest_NorthFeeder | 1 | 2 |
| Crookston CSC | Hallock_Northwest_SouthFeeder | 0 | 2 |

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Crookston CSC | Halma_MainFeeder | 0 | 122 |
| Crookston CSC | Harold_MainFeeder | 0 | 5,860 |
| Crookston CSC | Holt_Junction_MainFeeder | 6 | 26 |
| Crookston CSC | Humboldt_MainFeeder | 0 | 6,371 |
| Crookston CSC | Karlstad_NorthFeeder | 0 | 21 |
| Crookston CSC | Karlstad_SouthFeeder | 0 | 10 |
| Crookston CSC | Kennedy_MainFeeder | 0 | 1,465 |
| Crookston CSC | Lake_Bronson_MainFeeder | 2 | 7 |
| Crookston CSC | Lancaster_MainFeeder | 0 | 6 |
| Crookston CSC | Mountain_MainFeeder | 0 | 5 |
| Crookston CSC | New_Folden_MainFeeder | 0 | 1 |
| Crookston CSC | Northcote_EastFeeder | 0 | 8 |
| Crookston CSC | Northcote_WestFeeder | 0 | 3 |
| Crookston CSC | Oslo_MainFeeder | 3 | 1 |
| Crookston CSC | Oslo_Manvel | 6 | 0 |
| Crookston CSC | Plummer_MainFeeder | 0 | 773 |
| Crookston CSC | Red_Lake_Falls_East_NorthFeeder | 0 | 91 |
| Crookston CSC | Red_Lake_Falls_East_SouthFeeder | 0 | 908 |
| Crookston CSC | Red_Lake_Falls_East_StHilaireFeeder | 0 | 6,622 |
| Crookston CSC | Red_Lake_Falls_SW_DetroiterFeeder | 0 | 8 |
| Crookston CSC | Red_Lake_Falls_SW_SoutheastFeeder | 0 | 12 |
| Crookston CSC | Strandquist_MainFeeder | 0 | 4 |
| Crookston CSC | Viking_MainFeeder | 0 | 4 |
| Fergus Falls CSC | Ashby_Line_Jct_MainFeeder | 0 | 6 |
| Fergus Falls CSC | Audubon_NorthFeeder | 3 | 6 |
| Fergus Falls CSC | Audubon_SouthFeeder | 5 | 13 |
| Fergus Falls CSC | Battle_Lake_TownFeeder | 3 | 1 |
| Fergus Falls CSC | Brandon_TownFeeder | 0 | 348 |
| Fergus Falls CSC | Clitherall_MainFeeder | 3 | 64 |
| Fergus Falls CSC | Dalton_Jct_DaltonFeeder | 10 | 0 |
| Fergus Falls CSC | Dalton_Jct_Swan_LakeFeeder | 0 | 1 |
| Fergus Falls CSC | Deer_Creek_MainFeeder | 37 | 1 |
| Fergus Falls CSC | Detroit_Lakes_NW_Rural_MainFeeder | 1 | 536 |
| Fergus Falls CSC | Elbow_Lake_North_Rural_MainFeeder | 1 | 6 |
| Fergus Falls CSC | Erdahl_Melby_Ashby_Erdahl_MainFeeder | 0 | 45 |
| Fergus Falls CSC | Erdahl_Melby_Ashby_MainFeeder | 0 | 95 |
| Fergus Falls CSC | Erhard_MainFeeder | 1 | 0 |
| Fergus Falls CSC | Evansville_EastFeeder | 0 | 7 |

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Fergus Falls CSC | Evansville_WestFeeder | 0 | 3 |
| Fergus Falls CSC | Fergus_Falls_Edgetown_BuseExpressFeeder | 0 | 227 |
| Fergus Falls CSC | Fergus_Falls_Edgetown_CollegeFeeder | 1 | 22 |
| Fergus Falls CSC | Fergus_Falls_Edgetown_Convention_CenterFeeder | 0 | 2 |
| Fergus Falls CSC | Fergus_Falls_Edgetown_Industrial_ParkFeeder | 0 | 279 |
| Fergus Falls CSC | Fergus_Falls_North_Cleveland_EastFeeder | 0 | 1 |
| Fergus Falls CSC | Fergus_Falls_Northeast_Jensen_AdditionFeeder | 0 | 1 |
| Fergus Falls CSC | Fergus_Falls_Northeast_Springen_AvenueFeeder | 0 | 2 |
| Fergus Falls CSC | Fergus_Falls_Northeast_Water_PlantFeeder | 0 | 270 |
| Fergus Falls CSC | Foxhome_MainFeeder | 0 | 12,748 |
| Fergus Falls CSC | Garfield_HolmesCity_SouthFeeder | 63 | 1,129 |
| Fergus Falls CSC | Garfield_HolmesCity_TownFeeder | 0 | 1,064 |
| Fergus Falls CSC | GRE_Alexandria_ForadaFeeder | 0 | 11 |
| Fergus Falls CSC | Lake_Park_Rest_HomeFeeder | 2 | 9 |
| Fergus Falls CSC | Millerville_Leaf_Valley_MainFeeder | 0 | 32 |
| Fergus Falls CSC | New_York_Mills_NorthFeeder | 0 | 1 |
| Fergus Falls CSC | New_York_Mills_SouthFeeder | 0 | 21,244 |
| Fergus Falls CSC | Otter_Outlet_EastFeeder | 3 | 0 |
| Fergus Falls CSC | Otter_Outlet_NorthFeeder | 0 | 2 |
| Fergus Falls CSC | Ottertail_City_NorthFeeder | 1 | 2,022 |
| Fergus Falls CSC | Ottertail_City_SouthFeeder | 0 | 2,697 |
| Fergus Falls CSC | Perham_BarrelOFunFeeder | 0 | 2 |
| Fergus Falls CSC | Perham_BongardFeeder | 0 | 10 |
| Fergus Falls CSC | Perham_Dent_RichvilleFeeder | 0 | 3 |
| Fergus Falls CSC | Perham_SouthFeeder | 0 | 11 |
| Fergus Falls CSC | Perham_TuffysFeeder | 0 | 9 |
| Fergus Falls CSC | Pokegama_MainFeeder | 0 | 9 |
| Fergus Falls CSC | Pomme_De_Terre_Gravel_Pit_MainFeeder | 1 | 22 |
| Fergus Falls CSC | Rothsay_MainFeeder | 3 | 7,517 |
| Fergus Falls CSC | Urbank_MainFeeder | 0 | 3 |
| Fergus Falls CSC | Vergas_MainFeeder | 3 | 1 |
| Fergus Falls CSC | Vining_MainFeeder | 0 | 30 |
| Fergus Falls CSC | Wendell_MainFeeder | 2 | 10 |
| Morris CSC | Alberta_MainFeeder | 0 | 2 |
| Morris CSC | Appleton_NW_NorthFeeder | 3 | 24 |
| Morris CSC | Appleton_NW_SouthFeeder | 0 | 6 |
| Morris CSC | Barrett_EastFeeder | 0 | 4 |
| Morris CSC | Barrett_WestFeeder | 0 | 2 |

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Morris CSC | Barry_MainFeeder | 0 | 1 |
| Morris CSC | Beardsley_MainFeeder | 25 | 0 |
| Morris CSC | Burr_MainFeeder | 1 | 0 |
| Morris CSC | Canby_NE_EastFeeder | 2 | 62 |
| Morris CSC | Canby_NE_WestFeeder | 0 | 6 |
| Morris CSC | Canby_S_Rural_MainFeeder | 2 | 4 |
| Morris CSC | Canby_SE_Rural_MainFeeder | 0 | 1 |
| Morris CSC | Canby_SW_EastFeeder | 0 | 5,497 |
| Morris CSC | Canby_SW_ElevatorFeeder | 0 | 4,294 |
| Morris CSC | Canby_SW_WestFeeder | 0 | 6,566 |
| Morris CSC | Chokio_MainFeeder | 0 | 16 |
| Morris CSC | Clontarf_MainFeeder | 0 | 4 |
| Morris CSC | Correll_MainFeeder | 0 | 9 |
| Morris CSC | Cyrus_MainFeeder | 0 | 959 |
| Morris CSC | Danvers_MainFeeder | 2 | 3 |
| Morris CSC | Dawson_AGP_EastFeeder | 0 | 1 |
| Morris CSC | Dawson_AGP_WestFeeder | 0 | 2 |
| Morris CSC | Dawson_EastFeeder | 34 | 1 |
| Morris CSC | Dawson_Rural265 | 0 | 3 |
| Morris CSC | Dawson_RuralBoyd | 0 | 2 |
| Morris CSC | DeGraff_MainFeeder | 0 | 4 |
| Morris CSC | Donnelly_MainFeeder | 1 | 110 |
| Morris CSC | Farwell_MainFeeder | 0 | 23 |
| Morris CSC | Ghent_MainFeeder | 1 | 2 |
| Morris CSC | Green_Valley_TownFeeder | 1 | 0 |
| Morris CSC | Green_Valley_Xcel_MainFeeder | 2 | 0 |
| Morris CSC | Hendricks_EastFeeder | 3 | 14 |
| Morris CSC | Hendricks_WestFeeder | 3 | 18 |
| Morris CSC | Herman_MainFeeder | 7 | 35 |
| Morris CSC | Hoffman_MainFeeder | 0 | 58 |
| Morris CSC | Holloway_NorthFeeder | 0 | 8 |
| Morris CSC | Holloway_SouthFeeder | 0 | 22 |
| Morris CSC | Ivanhoe_EastFeeder | 5 | 27 |
| Morris CSC | Ivanhoe_WestFeeder | 2 | 13 |
| Morris CSC | Ivanhoe_WilnoFeeder | 0 | 32 |
| Morris CSC | Johnson_MainFeeder | 0 | 7 |
| Morris CSC | Kensington_MainFeeder | 0 | 20 |
| Morris CSC | Kerkhoven_EastFeeder | 30 | 57 |

| Customer Service Center | Feeder | Number of Volt(RMS) Below Threshold | Number of Volt(RMS) Above Threshold |
|---|---|---|---|
| Morris CSC | Kerkhoven_WestFeeder | 0 | 33 |
| Morris CSC | Louisburg_LacQuiParle_NorthwestFeeder | 5 | 38 |
| Morris CSC | Louisburg_LacQuiParle_SouthFeeder | 5 | 12 |
| Morris CSC | Milan_Jct_West_RuralFeeder | 0 | 6 |
| Morris CSC | Minneota_EastFeeder | 1 | 0 |
| Morris CSC | Minneota_Industrial_MainFeeder | 1 | 941 |
| Morris CSC | Minneota_WestFeeder | 1 | 1 |
| Morris CSC | Morris_NE_PrairieInn | 0 | 14 |
| Morris CSC | Morris_NE_UMMFeeder | 0 | 27 |
| Morris CSC | Morris_S_115_EastFeeder | 0 | 3 |
| Morris CSC | Morris_S_115_EthanolFeeder | 0 | 2 |
| Morris CSC | Morris_S_115_SouthWestFeeder | 0 | 2 |
| Morris CSC | Murdock_MainFeeder | 1 | 2 |
| Morris CSC | Odessa_Bellingham_MainFeeder | 4 | 13 |
| Morris CSC | Odessa_Bellingham_SouthFeeder | 3 | 4,023 |
| Morris CSC | Ortonville_Cold_Spring_Quarry_ColdSpringFeeder | 0 | 4 |
| Morris CSC | Ortonville_Cold_Spring_Quarry_Ortonville_Ston_CompanyFeeder | 0 | 7 |
| Morris CSC | Porter_MainFeeder | 1 | 3 |
| Morris CSC | Taunton_StLeoFeeder | 1 | 0 |
| Wahpeton CSC | Nashua_Tintah_NashuaFeeder | 1 | 1,362 |
| Wahpeton CSC | Nashua_Tintah_TintahFeeder | 1 | 59 |

## J. STAFFING LEVELS AT EACH WORK CENTER

**Minnesota Rule 7826.0500, Reliability Reporting Requirements, Subpart 1j, requires utilities to file a report providing data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines.**

In compliance with this rule, Otter Tail reports staffing levels by CSC including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines. The staffing levels of Otter Tail's Minnesota CSCs as of December 31, 2020 are shown in **Table 8** below.

**Table 8**

| | Department | Type | Total |
|---|---|---|---|
| | Bemidji | Field<br>Office | 16<br>2 |
| | Bemidji Total | | 18 |
| | Crookston | Field<br>Office | 17<br>1 |
| | Crookston Total | | 18 |
| | Delivery Maintenance* | Field<br>Office | 11<br>1 |
| | Delivery Maintenance Total | | 12 |
| | Fergus Falls | Field<br>Office | 21<br>1 |
| | Fergus Falls Total | | 22 |
| | Milbank** | Field<br>Office | 18<br>2 |
| | Milbank Total | | 20 |
| | Morris | Field<br>Office | 17<br>1 |
| | Morris Total | | 18 |
| | Operations Support*** | Field<br>Office | 5<br>1 |
| | Operations Support Total | | 6 |
| | Wahpeton**** | Field<br>Office | 16<br>1 |
| | Wahpeton Total | | 17 |
| | Customer Care & Relations***** | | 35 |
| **12/31/2020 Total** | | | **166** |

*Delivery Maintenance is a department with employees that work in substations and with substation related equipment. During trouble, they are dispatched to do switching and other work associated with substation equipment.

**The Milbank CSC serves customers in both Minnesota and South Dakota and the number of employees indicated represents all employees located in the CSC.

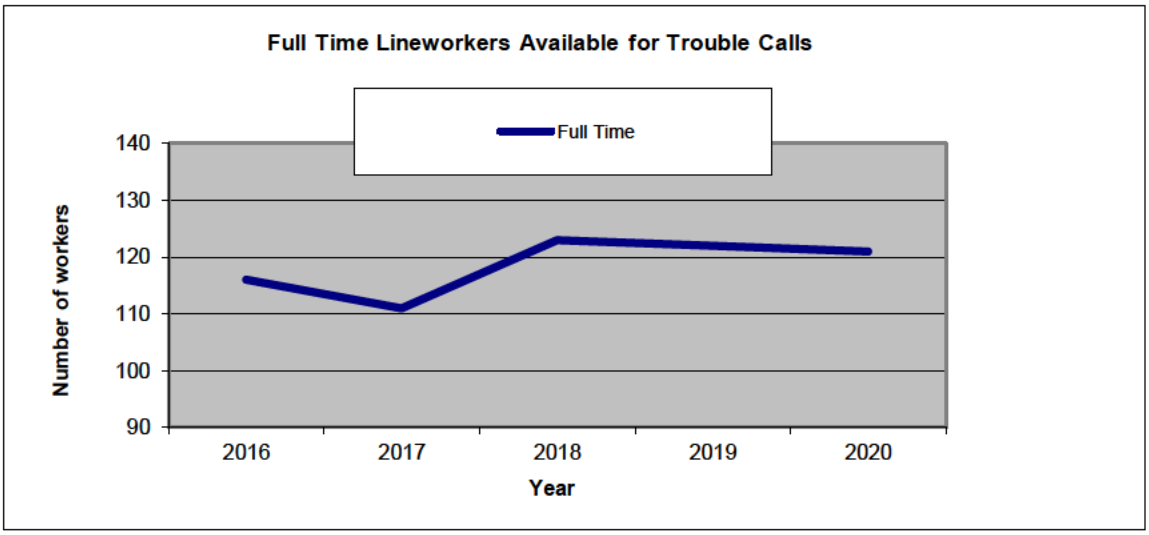
***Operations Support is based in Fergus Falls and the field employees are dispatched to assist CSCs in need throughout the entire system. The office employees coordinate resources.

****The Wahpeton CSC serves customers in Minnesota, North Dakota, and South Dakota and the number of employees indicated represents all employees located in the CSC.

***** Customer Care and Relations is the office staff that is made up of Customer Service Representatives, Lead Customer Service Representatives and Customer Service Management that are located in CSCs throughout our service territory. Since Otter Tail operates a Virtual Call Center, all the office staff located throughout the territory are accountable for answering outage calls in all states. The employee count for Customer Care and Relations is 35.

**Figure 6** below depicts by year the number of full-time line workers available for trouble and for the operation and maintenance of distribution lines. Otter Tail also has a reliability engineer who supports system reliability related functions. This individual is not included in the above staffing level information. Additionally, Otter Tail has engineers in its Asset Management area who, due to the nature of their roles, support reliability on a daily, weekly, monthly, and annual basis.

**Figure 6**



## K. OTHER INFORMATION RELEVANT IN EVALUATING RELIABILITY PERFORMANCE

**Minnesota Rule 7826.0500, Subpart 1k**, **requires utilities to file any other information the utility considers relevant in evaluating its reliability performance over the calendar year.**

Otter Tail's legacy Interruption Monitoring System (IMS) implemented in 2005 was shut down on December 31, 2019. This is Otter Tail's second year utilizing our new interruption monitoring system, IMS, for reliability monitoring/reporting and purposes of data collection. The new system utilizes AMI technology in a bellwether configuration. This system is more granular than our old system, thus, Otter Tail expects current and future recorded results to be different than historic values. Otter Tail provides the following information relating to its IMS and overall reliability.

1. **IMS obsolescence and adoption of the NextGen IMS:** Otter Tail has completed a project to replace its obsolete IMS. Our implementation plan included the completion of the new system in North Dakota in 2017. Installation in Minnesota and South Dakota was completed in late 2018. The new system provides added tools and analysis features that will allow Otter Tail to continue its reliability focus and efforts in the future.

   Otter Tail continues to install and utilize wireless power quality monitors in identified problem areas. These devices monitor voltage, current, power, voltage unbalance, histograms, profiles, etc. in near real-time. Monitors also have the ability to gather sub cycle data for transient, harmonic, etc. analysis. These monitors have greatly improved our ability to monitor, identify, and analyze issues in the field. This tool was also utilized to fill short term gaps/pockets created during our NextGen IMS implementation during installation and system transfer.

2. **Challenges in achieving reliability:** Otter Tail has the unique challenge of delivering reliable services to its customers across a large rural service territory, which has tremendous exposure to hazards such as vegetation, lightning, wind, and other weather-related issues. Our NextGen IMS and the use of power quality meters will continue to provide optimized and focused deployment of our vegetation management and maintenance resources to specific areas that are identified through the interruption data collection and analysis processes.

3. **Measuring reliability:** Otter Tail continues to evaluate alternate indices and the subsequent relationship towards reliability and customer satisfaction tracking. Our new interruption monitoring system has the capability to monitor the following indices: SAIFI, SAIDI, CAIDI, CTAIDI, CAIFI, ASAI, CEMI-5, CELID-s60, MAIFI, MAIFe, CEMSMI-5, and Total sustained customer minutes.

4. **SIRI Initiative:** Through the company's strategic planning process, Otter Tail's leadership identified the need for an initiative to focus on improving the electrical network and infrastructure to meet three strategic objectives; improve reliability, improve customer engagement, and improve business efficiency while looking forward to the future. The initiative was developed to help address aging infrastructure, as well as prepare for future system needs and technology. This information is further discussed in Otter Tail's Integrated Distribution Plan filing.

**Figures 7, 8, and 9.** The following graphs show Otter Tail's SAIDI, SAIFI and CAIDI for the period of 2016 through 2020. When compared to 2018 results, Minnesota customers experienced an increase in overall SAIDI, SAIFI, and CAIDI.

**Figure 7**

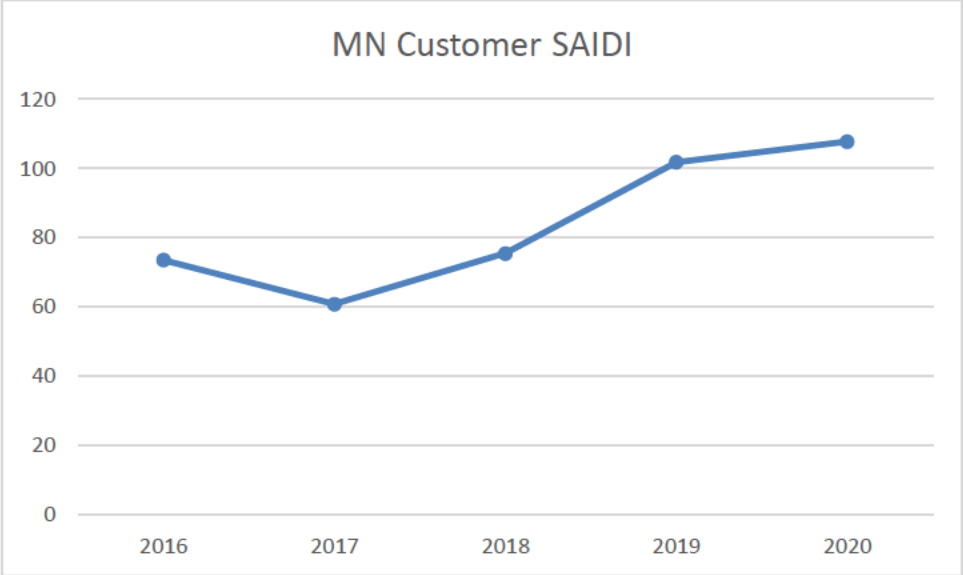


**Figure 8**

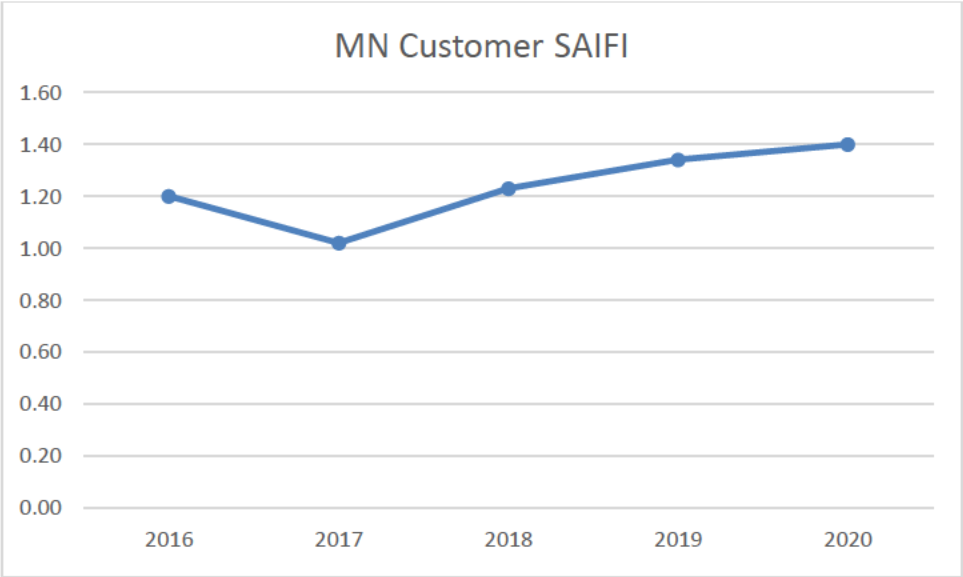
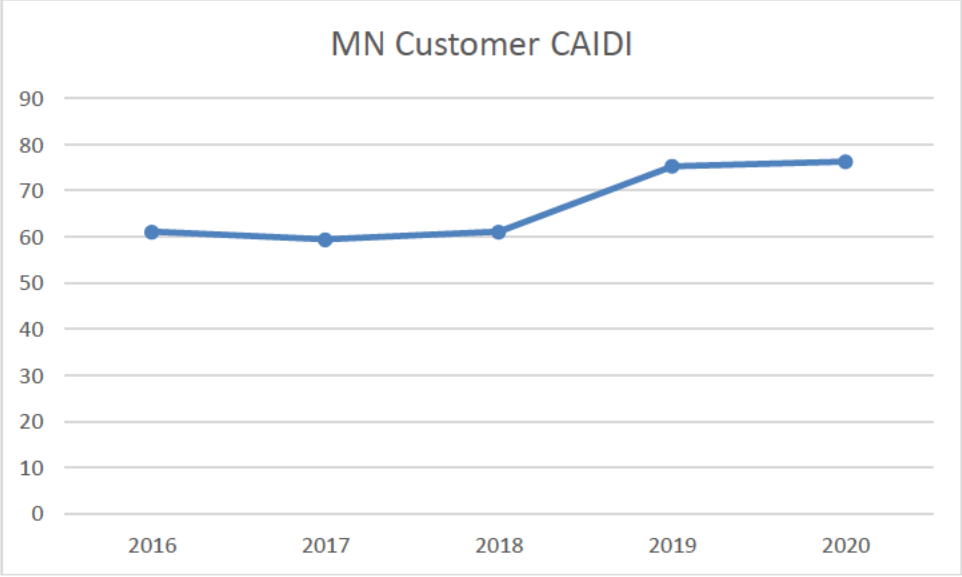



**Figure 9**



## L. OTTER TAIL POLICIES, PROCEDURES, AND ADDITIONAL COMPLIANCE OBLIGATIONS

Otter Tail provides the following description of the policies and procedures that it has previously implemented and continues to utilize to improve reliability. Additional compliance obligation requirements are also provided.

**The following is a list of reports that continue to be distributed internally. These reports ensure that Otter Tail employees are aware of issues in the system on a timely basis and can respond quickly to maintain and improve overall system reliability.**

1. **Internal Reporting**

    a. Monthly Reliability Report: Otter Tail distributes to all employees an overall summary of system performance as compared to internal KPI's. This report shows SAIDI, SAIFI, CAIDI, and MAIFI for the system.

    b. Additional reporting: Otter Tail will continue to evaluate and track other indices in 2020 and develop internal KPI's that are reported and published to Otter Tail's Asset Management and Customer Service Departments.

2. **Proactive Inspections and Testing**

    a. Field Inspections: Otter Tail conducts several periodic patrols and inspections throughout the transmission and distribution system. Transmission substations and lines are inspected and patrolled on an annual basis and more often when issues are identified. Distribution substations are inspected for safety and equipment concerns on a periodic basis. The oil in substation transformers is sampled and tested for dissolved gas. Transformers greater than 10 MVA are tested annually and transformers less than 10 MVA are tested every three years.

    b. Pole integrity testing: Otter Tail currently contracts for ground line inspections and treatment work of aged transmission poles for replacement identification.

    c. Underground Replacement: Otter Tail continues its focus on replacing outdated and failing underground conductors. The Area Engineers proactively identify areas of concern and budget for replacement during the following year. Potential replacement candidates are identified and included in Otter Tail's Proactive UG Replacement project listing.

Additional Items: In addition to the above-mentioned items, Otter Tail also employs a number of other policies, procedures, and committees to evaluate reliability and safety concerns that include, but are not limited to:

- Distribution Standards Committee
- Line inspections
- Workforce Planning Committee
- Transformer Installation and Change-out Loading Guide
- Voltage upgrades and evaluations as needed
- Mobile underground fault locating vans and associated equipment
- Wildlife protection and deterrent devices

**The following are additional compliance obligation requirements.**

3. **Attachment B: Updated Annual Reporting Requirements *(Clarifications to March 2019 Order Requirements*) of January 28, 2020 PUC Order in Docket No. E017/M-19-260**

    a. ***Attachment B paragraph 1:*** *Non-normalized SAIDI, SAIFI, and CAIDI values.*

    These are previously shown in section IV, A-D, Table 4a.

    b. ***Attachment B paragraph 2:*** *SAIDI, SAIFI, and CAIDI, MAIFI, CEMI, and CELI normalized values calculated using the IEEE 1366 Standard.*

    SAIDI, SAIFI, and CAIDI values are previously shown in section IV, A-D, Table 4. MAIFI normalized and non-normalized values are previously shown in section II, Table 1. CEMI, and CELI normalized and non-normalized values follow in Tables 9 and 10.

    c. ***Attachment B paragraph 3:*** *MAIFI – normalized and non-normalized.*

    These are previously shown in section II, Table 1.

    d. ***Attachment B paragraph 4:*** *CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.*

**Table 9**
2020 system normalized and non-normalized CEMI

| | |
|---|---|
| CEMI4 | 8.36% |
| CEMI5 | 3.16% |
| CEMI6 | 0.80% |

e. ***Attachment B paragraph 5:*** *The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).*

Since no designation is given regarding the "type" of interruption, the North Feeder fed from the Ottertail City Substation was the feeder experiencing the most interruptions. This Fergus Falls CSC worst performing circuit had 1 sustained and 27 momentary interruptions impacting 876 customers.

f. ***Attachment B paragraph 6:*** *CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.*

**Table 10**
2020 system normalized and non-normalized CELID

| | |
|---|---|
| CELID6 | 1.61% |
| CELID12 | 0.19% |
| CELID24 | 0.00% |

g. ***Attachment B paragraph 7:*** *The longest experienced interruption by any one customer (or feeder, if customer level is not available).*

The Main Feeder fed from the Herman Substation experienced the longest duration interruption at 8 hours and 26 minutes, impacting 133 customers. This was a planned outage to upgrade the substation.

h. ***Attachment B paragraph 8:*** *A breakdown of field versus office staff as required Minn. Rules 7826.0500, Subp. 1, J, including separate information on the number of contractors for each work center.*

Previously shown in section IV, J, Table 8.

i. ***Attachment B paragraph 9:*** *Estimated restoration time accuracy, using the following windows:*
    *a. Within -90 minutes to 0 of estimated restoration time*
    *b. Within 0 to +30 minutes of estimated restoration time*

It is not currently feasible for Otter Tail to estimate restoration times. Otter Tail does not have a system (such as an Advanced Distribution Management System or Outage Management System) in which to create, track, and manage estimated restoration times.

j. ***Attachment B paragraph 10:*** *IEEE benchmarking results for SAIDI, SAIFI, CAIDI, and MAIFI from the IEEE benchmarking working group.*

Otter Tail located a working group summary of IEEE's 2019 Benchmark Reliability Survey results and compared its 2020 results with second quartile threshold (median) results in **Table 11** below. As discussed in previous filings, Otter Tail is a member of Edison Electric Institute (EEI) and has been participating in their Reliability Benchmark Survey for the past eight years. Otter Tail also provides the performance

comparison utilizing the second quartile results from the 2019 EEI Reliability Survey.

**Table 11**

| | OTP 2020 MN Normalized Results | OTP 2020 System Normalized Results | 2019 IEEE median normalized all respondents | 2019 IEEE median normalized medium sized | 2019 EEI second quartile normalized |
|---|---|---|---|---|---|
| SAIFI | 1.4 | 1.32 | 1.12 | 1.17 | 0.875 – 1.036 |
| SAIDI | 107.66 | 91.27 | 126 | 140 | 82.63 – 113.45 |
| CAIDI | 76.72 | 69.1 | 116 | 124 | 95.28 – 110.01 |
| MAIFI | 6.64 | 5.53 | NA | NA | 1.228 – 1.542 |

Otter Tail will provide a supplemental filing within 30 days from when IEEE's 2020 Benchmark Reliability Survey results are completed. Otter Tail will compare its results with the median values of SAIFI, SAIDI, and CAIDI for "medium" sized utilities as reported in the survey results.

k. ***Attachment B paragraph 10:*** *Performance by customer class:*

It is not feasible for Otter Tail to provide performance by customer class at this time. Otter Tail measures reliability at the feeder level. Otter Tail has feeders with more than one class on them.

l. ***Attachment B paragraph 11:*** *Causes of sustained customer outages, by work center.*

Previously shown in section IV, A-D, Table 5.

**4. December 18, 2020 PUC Order in Docket No. E017/M-20-401 (2019 Annual SRSQ Report)**

*a.* ***Ordering paragraph 4:*** *The Commission hereby grants a variance to Minn. R. 7826.0500, subp. 1, item G, applicable to Minnesota Power, Otter Tail, and Xcel. The utilities must file a summary table that includes the information contained in the reports, similar to Attachment G of Xcel's filing.*

This variance was referenced at section IV, G above and the summary is included as Attachment 1 to this report.

*b.* ***Ordering paragraph 5:*** *The utilities must file the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year*

*average reliability for the same feeders before grid modernization investments.*

This is not applicable for Otter Tail at this time given the company does not have AMI nor FLISR installed.

c. ***Ordering paragraph 6:*** *With the 2020 service quality reports due April 2021, the utilities must discuss and propose a transition to a full benchmarking approach to setting reliability standards. In advance of the transition, the Commission hereby delegates authority to the Executive Secretary to continue conversations with utilities and other interested parties on the following topics. a. Definition of "work centers" b. Benchmarking for individual work centers c. Other considerations for the transition to benchmarking.*

Otter Tail addresses this in the next section of this report, Section V.

d. ***Ordering paragraph 9***. *The Commission hereby sets Otter Tail Power's 2020 Minnesota service territory-wide Reliability Standard at the IEEE benchmarking second quartile for medium utilities. The Company must file a supplemental filing to its 2020 service quality report 30 days after IEEE publishes the 2020 benchmarking results, with an explanation for any statewide standards the utility did not meet.*

Otter Tail will provide a supplemental filing within 30 days from when IEEE's 2020 Benchmark Reliability Survey results are completed. Otter Tail will compare it's results with the median values of SAIFI, SAIDI, and CAIDI for "medium" sized utilities as reported in the survey results and provide explanations for standards not met.

e. ***Ordering paragraph 14.*** *Each utility must report over the next two reporting cycles, to the extent feasible, the following:*

   a. *Yearly total number of website visits;*

   b. *Yearly total number of logins vis electronic customer communication platforms;*

   c. *Yearly total number of emails or other customer service electronic communications received; and*

   d. *Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance program and disconnections as part of reporting under Minn. R. 7826.1700.*

   *If a utility is unable to report the information, the utility must provide an explanation as to why the information is not filed and the plans for reporting the information in the future.*

**Table 12** below is a count of customer requests from our self-service area within our website. The information within the table is broken out by our categories on our website. These requests create an email to our office team to ultimately to complete the transaction for our customers. We were unable to separate this information by state. The information in this table represents inquiries from our entire service territory.

**Table 12**

| Service Request Type | Count of request type |
|---|---|
| ⊞Change Mailing Address | 21 |
| ⊞Meter Reading | 518 |
| ⊞Start Service | 67 |
| Grand Total | 606 |

**Table 13** below is a count of customer contacts that were submitted through our Contact Us section within our website. Contact Us is the area on our website where customers can asks their questions and engage in dialogue via email. When a customer utilizes the Contact Us feature they are prompted to choose a topic as the subject for their inquiry. Below are the number of Contact Us emails by topic. The information in this table represents inquiries from our entire service territory.

**Table 13**

| Contact Us Topic | Topic Count |
|---|---|
| Otter Tail Investments | 15 |
| Turn on/ turn off/ transfer service | 80 |
| Generation interconnection | 4 |
| Help with technical issue | 35 |
| Business Energy Expert | 3 |
| Other | 228 |
| Send copy of my last bill | 20 |
| Enroll in EMP | 290 |
| Payment programs/ arrangements | 116 |
| Street light/ security light | 69 |
| Energy control | 38 |
| Economic development | 6 |
| Jobs | 12 |
| My account | 631 |
| Tree trimming request | 46 |
| Rebates/ programs/ financing | 81 |
| Tell us how we're doing | 14 |
| Grand Total | 1688 |

**Table 14** below is a count of our website visits and logins for our various customer communication platforms. The information in this table represents our entire service territory.

**Table 14**

| | Website | Facebook | Twitter | LinkedIn |
|---|---|---|---|---|
| Jan-20 | 210,704 | 1,686 | 869 | 404 |
| Feb-20 | 192,899 | 645 | 270 | 289 |
| Mar-20 | 184,000 | 755 | 709 | 419 |
| Apr-20 | 187,013 | 1,420 | 1,670 | 539 |
| May-20 | 170,404 | 1,326 | 775 | 587 |
| Jun-20 | 189,199 | 1,953 | 684 | 674 |
| Jul-20 | 211,137 | 1,961 | 935 | 693 |
| Aug-20 | 206,283 | 1,178 | 326 | 638 |
| Sep-20 | 196,574 | 2,119 | 539 | 801 |
| Oct-20 | 221,139 | 1,765 | 287 | 767 |
| Nov-20 | 191,355 | 2,182 | 257 | 660 |
| Dec-20 | 189,088 | 1,052 | 553 | 596 |
| Total | 2,349,795 | 18,042 | 7,874 | 7,067 |

*f.* ***Ordering paragraph 15****. Within 30 days, each utility must file a compliance filing in which engagement plans related to Emergency Medical Account status are explained. Otter Tail and Xcel must also include a detailed description of the resolution to the reporting problems attributed to their updated Customer Information System/SAP work management system as it pertains to their Service Extension request response times.*

Otter Tail submitted this compliance filing with the Minnesota Public Utilities Commission on January 18, 2021 in Minnesota Docket No. E017/M-20-401.

*g.* ***Ordering paragraph 16.*** *After consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data. The Commission hereby delegates authority to the Executive Secretary to approve additional reporting categories, with the goal of establishing them by the April 1, 2021 reporting deadline.*

Commission Staff, including the Consumer Affairs Office, convened a work group meeting on Monday, March, 1, 2021 with the Department of Commerce, Xcel Energy, Minnesota Power, and Otter Tail Power to review and discuss current complaint categories used in annual Safety, Reliability, and Service Quality ("SRSQ") reports. Minnesota Rule 7826.2000 was reviewed along with the current categories used by each of the utilities and the Consumer Affairs Office. The group agreed to work together to further refine definitions for existing categories to allow for greater specificity and seek consistency, where possible. As part of this review, additional categories may be considered based on emerging topics of interest. Quarterly meetings will continue in 2021 with the objective of establishing a recommendation for use with the next calendar year (2022) to align with SRSQ reporting cycles.

h. ***Ordering paragraph 17***. *The Commission hereby delegates to the Executive Secretary the authority to approve Xcel's, Minnesota Power's, and Otter Tail's public-facing summaries. The Executive Secretary may work with the utilities to refine the language and content in the summaries as needed.*

Included with this report as Attachment 2 is Otter Tail's 2020 Public Facing Summary. On March 15, 2021, Otter Tail provided a copy to Commission Staff for review. To improve upon last year's summary, Otter Tail has introduced additional statistics (MN Only) for Safety, Reliability and Customer Service as suggested by staff and others. Also included is information on how customers can reach out to us for assistance.

# V. RELIABILITY STANDARDS 7826.0600

## PROPOSED RELIABILITY PERFORMANCE STANDARDS

**Minnesota Rule 7826.0600, Subpart 1, requires utilities to file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers**.

As ordered in **Docket No. E017/M-15-322 dated August 14, 2015**, Otter Tail's reliability standards have been frozen, until the company has shown sufficient improvement in indices' performance.

As anticipated in last year's filing, Otter Tail did realize increases in SAIDI, SAIFI, and CAIDI with the implementation of the new Interruption Monitoring System in 2019. That situation is consistent with Otter Tail's 2020 report results. This was due to the new system's method of feeder data collection, increasing the number of interruptions seen, i.e., greater granularity.

Otter Tail proposes to make a change from six service centers to four service centers for its 2021 report. Minnesota customers served by the Wahpeton and Milbank CSCs will be included in Fergus Falls and Morris CSCs' (respectively) analysis and which includes all Minnesota customers. Otter Tail also proposes to set indices' standards at IEEE's Reliability Benchmark Survey median values for medium sized utilities. This report historically is completed, and results posted, the third quarter of the following year. As stated, Otter Tail will provide a supplemental filing within 30 days from when IEEE's 2020 Benchmark Reliability Survey results are completed and provide explanations for standards not met.

# VI. REPORTING METER-READING PERFORMANCE 7826.1400

**Minnesota Rule 7826.1400, Reporting Meter Reading Performance, requires utilities to provide a detailed report on the utility's meter-reading performance.** In compliance with this rule, Otter Tail provides **Tables 15-18** for its meter reading performance for 2020.

**A & B. The number and percentage of customer meters read by utility personnel and the number and percentage of customer meters self-read by the customer.**

**Table 15**
Otter Tail Power Company Meter Reading Performance
January 1, 2020 to December 31, 2020
**Residential** – MN

| | Residential | | | | | | |
|---|---|---|---|---|---|---|---|
| Month | Meters Read | % | Meters Estimated | % | Self Read | % | Total Meters |
| 1 | 62,181 | 97.64% | 706 | 1.11% | 797 | 0.013 | 63,684 |
| 2 | 62,324 | 97.92% | 521 | 0.82% | 805 | 0.013 | 63,650 |
| 3 | 61,282 | 96.79% | 1,300 | 2.05% | 733 | 0.012 | 63,315 |
| 4 | 61,944 | 97.22% | 985 | 1.55% | 784 | 0.012 | 63,713 |
| 5 | 61,654 | 97.84% | 536 | 0.85% | 828 | 0.013 | 63,018 |
| 6 | 62,948 | 97.30% | 975 | 1.51% | 773 | 0.012 | 64,696 |
| 7 | 61,405 | 96.75% | 1,313 | 2.07% | 748 | 0.012 | 63,466 |
| 8 | 63,109 | 97.43% | 904 | 1.40% | 760 | 0.012 | 64,773 |
| 9 | 63,053 | 97.24% | 1,021 | 1.57% | 770 | 0.012 | 64,844 |
| 10 | 62,905 | 97.48% | 838 | 1.30% | 785 | 0.012 | 64,528 |
| 11 | 61,508 | 96.25% | 1,604 | 2.51% | 793 | 0.012 | 63,905 |
| 12 | 61,669 | 97.32% | 931 | 1.47% | 770 | 0.012 | 63,370 |
| | *745,982* | 97.26% | *11,634* | 1.52% | *9,346* | 0.012 | *766,962* |

**Table 16**
Otter Tail Power Company Meter Reading Performance
January 1, 2020 to December 31, 2020
**Small Commercial** – MN

| | Small Commercial | | | | | | |
|---|---|---|---|---|---|---|---|
| Month | Meters Read | % | Meters Estimated | % | Self Read | % | Total Meters |
| 1 | 14,830 | 96.44% | 257 | 1.67% | 290 | 1.89% | 15,377 |
| 2 | 14,884 | 97.00% | 162 | 1.06% | 298 | 1.94% | 15,344 |
| 3 | 14,750 | 96.45% | 255 | 1.67% | 288 | 1.88% | 15,293 |
| 4 | 14,686 | 95.36% | 415 | 2.69% | 299 | 1.94% | 15,400 |
| 5 | 15,084 | 96.85% | 196 | 1.26% | 295 | 1.89% | 15,575 |
| 6 | 15,491 | 96.69% | 240 | 1.50% | 290 | 1.81% | 16,021 |
| 7 | 14,958 | 96.13% | 308 | 1.98% | 294 | 1.89% | 15,560 |
| 8 | 15,434 | 95.99% | 352 | 2.19% | 292 | 1.82% | 16,078 |
| 9 | 15,399 | 95.77% | 388 | 2.41% | 292 | 1.82% | 16,079 |
| 10 | 15,477 | 96.47% | 265 | 1.65% | 301 | 1.88% | 16,043 |
| 11 | 15,254 | 95.67% | 394 | 2.47% | 296 | 1.86% | 15,944 |
| 12 | 14,675 | 96.13% | 304 | 1.99% | 287 | 1.88% | 15,266 |
| | *180,922* | 96.25% | *3,536* | 1.88% | *3,522* | 1.87% | *187,980* |

**Table 17**
Otter Tail Power Company Meter Reading Performance
January 1, 2020 to December 31, 2020
**Large Commercial** – MN

| | Large Commercial | | | | | | |
|---|---|---|---|---|---|---|---|
| Month | Meters Read | % | Meters Estimated | % | Self Read | % | Total Meters |
| 1 | 915 | 99.24% | 7 | 0.76% | . | 0.00% | 922 |
| 2 | 925 | 99.68% | 3 | 0.32% | . | 0.00% | 928 |
| 3 | 930 | 99.79% | 2 | 0.21% | . | 0.00% | 932 |
| 4 | 924 | 98.72% | 12 | 1.28% | . | 0.00% | 936 |
| 5 | 895 | 99.67% | 3 | 0.33% | . | 0.00% | 898 |
| 6 | 933 | 100.00% | . | 0.00% | . | 0.00% | 933 |
| 7 | 893 | 99.33% | 6 | 0.67% | . | 0.00% | 899 |
| 8 | 931 | 98.52% | 14 | 1.48% | . | 0.00% | 945 |
| 9 | 942 | 99.68% | 3 | 0.32% | . | 0.00% | 945 |
| 10 | 933 | 99.26% | 7 | 0.74% | . | 0.00% | 940 |
| 11 | 933 | 99.15% | 8 | 0.85% | . | 0.00% | 941 |
| 12 | 917 | 99.14% | 8 | 0.86% | . | 0.00% | 925 |
| | *11,071* | 99.34% | *73* | 0.66% | . | 0.00% | *11,144* |

**Table 18**
Otter Tail Power Company Meter Reading Performance
January 1, 2020 to December 31, 2020
**Total** – MN

| | System | | | | | | |
|---|---|---|---|---|---|---|---|
| Month | Meters Read | % | Meters Estimated | % | Self Read | % | Total Meters |
| 1 | 77,926 | 97.43% | 970 | 1.21% | 1,087 | 1.36% | 79,983 |
| 2 | 78,133 | 97.76% | 686 | 0.86% | 1,103 | 1.38% | 79,922 |
| 3 | 76,962 | 96.76% | 1,557 | 1.96% | 1,021 | 1.28% | 79,540 |
| 4 | 77,554 | 96.88% | 1,412 | 1.76% | 1,083 | 1.35% | 80,049 |
| 5 | 77,633 | 97.66% | 735 | 0.92% | 1,123 | 1.41% | 79,491 |
| 6 | 79,372 | 97.21% | 1,215 | 1.49% | 1,063 | 1.30% | 81,650 |
| 7 | 77,256 | 96.66% | 1,627 | 2.04% | 1,042 | 1.30% | 79,925 |
| 8 | 79,474 | 97.16% | 1,270 | 1.55% | 1,052 | 1.29% | 81,796 |
| 9 | 79,394 | 96.98% | 1,412 | 1.72% | 1,062 | 1.30% | 81,868 |
| 10 | 79,315 | 97.31% | 1,110 | 1.36% | 1,086 | 1.33% | 81,511 |
| 11 | 77,695 | 96.17% | 2,006 | 2.48% | 1,089 | 1.35% | 80,790 |
| 12 | 77,261 | 97.11% | 1,243 | 1.56% | 1,057 | 1.33% | 79,561 |
| | *937,975* | 97.09% | *15,243* | 1.58% | *12,868* | 1.33% | *966,086* |

**C. The number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read.**

In 2020, 52 meters for customers of Otter Tail were not read by utility personnel for a period of 6 months to 12 months. Otter Tail had 0 meters not read for a period greater than 12 months.

In 2020, Otter Tail did see several reasons for estimating meters however most were due to the COVID-19 pandemic. To increase our employee's safety, we did not allow employees to enter living quarters or areas that could be of concern. We also encountered no access situations where we are communicating with the customer on proper remedies. One customer has 30 meters that are accessed by walking through their facility. Due to the customer being within the long-term healthcare industry we are not entering the facility to obtain those readings.

**D. Data on monthly meter-reading staffing levels, by work center or geographical area.**

**Table 19**

| Count of Location<br>Row Labels | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Grand Total |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| **Bemidji** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **9** | **108** |
| Service Representative | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 9 | 108 |
| **Crookston** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **156** |
| Apprentice Service Repres | 2 | 2 | 1 | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 15 |
| Service Representative | 11 | 11 | 12 | 11 | 12 | 12 | 12 | 12 | 12 | 12 | 12 | 12 | 141 |
| **Fergus Falls** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **13** | **156** |
| Service Representative | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 156 |
| **Milbank** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **14** | **168** |
| Apprentice Service Repres | 2 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 1 | 13 |
| Service Representative | 12 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 13 | 155 |
| **Morris** | **13** | **13** | **12** | **12** | **12** | **13** | **13** | **13** | **13** | **12** | **13** | **13** | **152** |
| Apprentice Service Repres | 1 | 1 | 2 | 1 | 1 | 2 | 2 | 2 | 2 | 2 | 3 | 3 | 22 |
| Journeyman Meter Reader | 1 | 1 | | 1 | 1 | 1 | 1 | 1 | 1 | | | | 8 |
| Service Representative | 11 | 11 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 122 |
| **Wahpeton** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **10** | **120** |
| Service Representative | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 10 | 120 |
| **Grand Total** | **72** | **72** | **71** | **71** | **71** | **72** | **72** | **72** | **72** | **71** | **72** | **72** | **860** |

*Note: Milbank - The Milbank CSC serves customers in both Minnesota and South Dakota and the number of employees represents all employees for the CSC.*

*Note: Wahpeton - The Wahpeton CSC Center serves customers in Minnesota, North Dakota and South Dakota and the number of employees represents all employees for the CSC.*

Otter Tail utilizes its Service Representatives to read its meters on a monthly basis except in the following towns where a third party reads the Company's meters:

| | | |
|---|---|---|
| Amiret MN | Eldred MN | Oklee MN |
| Argyle MN | Erskine MN | Oslo MN |
| Audubon MN | Fergus Falls MN | Ottertail MN |
| Battle Lake MN | Fertile MN | Pelican Rapids MN |
| Barry MN | Fisher MN | Pennock MN |
| Beardsley M | Frazee MN | Perham MN |
| Bejou MN | Foxhome MN | Plummer MN |
| Bellingham MN | Gentily MN | Porter MN |
| Beltrami MN | Ghent MN | Red Lake Falls MN |
| Bemidji MN | Graceville MN | Richville MN |
| Brooks MN | Green Valley MN | Rothsay MN |
| Boyd MN | Gonvick MN | Saint Hilaire MN |
| Burr MN | Gully MN | Shevlin MN |
| Campbell MN | Hancock MN | Solway MN |
| Canby MN | Hallock MN | St. Leo MN |
| Chokio MN | Henning MN | Sunburg MN |
| Clearbrook MN | Holloway MN | Taunton MN |
| Climax, MN | Johnson MN | Tenney MN |
| Clinton MN | Kent MN | Tintah MN |
| Clitherall MN | Kerkhoven MN | Trail MN |
| Correll MN | Lockhart MN | Twin Valley MN |
| Crookston MN | Loouisburg MN | Ulen MN |
| Cyrus MN | Mahnomen MN | Underwood MN |
| Dalton MN | Marshall MN (Rural) | Vergas MN |
| Danvers MN | McIntosh MN | Vining MN |
| Dawson MN | Milan MN | Waubun MN |
| Dent MN | Milroy MN | Wendell MN |
| Deer Creek MN | Minneota MN | Wheaton MN |
| Degraff MN | Morris MN | Wilton MN |
| Detroit Lakes MN | Murdock MN | Winger MN |
| Doran MN | Nashua MN | |
| Dumont MN | New York Mills MN | |

In 2020, we did increase the number of towns being read by our third-party meter reader. Our full-time meter reader retired from the company. A portion of the towns that he was accountable to read were transitioned to our third party contracted meter reader.

# VII. REPORTING INVOLUNTARY DISCONNECTIONS 7826.1500

**Minnesota Rule 7826.1500, Reporting Involuntary Disconnections, requires utilities to provide a detailed report on involuntary disconnections of service.** In compliance with this rule, Otter Tail provides its report of involuntary disconnections of service.

**A. Number of customers who received disconnection notices.**

**Table 20**

| Month | Large Commercial | Residential | Small Commercial | Grand Total |
|---|---|---|---|---|
| January | 21 | 4537 | 426 | 4984 |
| February | 17 | 4283 | 369 | 4669 |
| March | 22 | 4832 | 459 | 5313 |
| April | 23 | 430 | 110 | 563 |
| May | 25 | 0 | 0 | 25 |
| June | 22 | 0 | 0 | 22 |
| July | 22 | 0 | 0 | 22 |
| August | 16 | 0 | 0 | 16 |
| September | 15 | 0 | 0 | 15 |
| October | 22 | 0 | 0 | 22 |
| November | 13 | 0 | 0 | 13 |
| December | 13 | 0 | 0 | 13 |
| Grand Total | 231 | 14082 | 1364 | 15677 |

With the onset of the COVID-19 pandemic, on April 2, 2020 we discontinued sending disconnect noticed to our residential, farm, and small commercial customers.

**B. Number of customers who sought cold weather rule protection under Minnesota Statutes §216B.096 and §216B.097 and the number who were granted cold weather rule protection.**

**Table 21**

| Month | Customers who sought Cold Weather Rule Protection in 2020 | Number Granted Cold Weather Protection in 2020 |
|---|---|---|
| January | 89 | 76 |
| February | 75 | 69 |
| March | 47 | 47 |
| April | 19 | 17 |
| May | 1 | 0 |
| June | 0 | 0 |
| July | 0 | 0 |
| August | 0 | 0 |
| September | 0 | 0 |
| October | 20 | 17 |
| November | 53 | 41 |
| December | 121 | 82 |

In 2020, the number of CWP requests increased throughout the CWP season. The deviation between customers who sought CWP and the customers granted CWP is due to Otter Tail having to access the CWP form within our customer information system to begin our CWP discussion with the customer on the monthly amount of their CWP amount. Customers are not denied CWP but rather the customer chose an alternative payment option.

**C. Total number of customers whose service was disconnected involuntarily, and the number of these customers restored to service within 24 hours.**

**Table 22**

**7826.1500 Subpart C - Customers involuntarily disconnected in 2020**

| Month | Customer Class | Disconnected For more than 24 hours | Service Restored within 24 hours | Grand Total |
|---|---|---|---|---|
| January | Residential | 13 | 3 | 16 |
| | Small Commercial | 3 | 0 | 3 |
| January Total | | 16 | 3 | 19 |
| February | Residential | 15 | 7 | 22 |
| | Small Commercial | 0 | 0 | 0 |
| February Total | | 15 | 7 | 22 |
| March | Residential | 12 | 5 | 17 |
| | Small Commercial | 0 | 1 | 1 |
| March Total | | 12 | 6 | 18 |
| April | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| April Total | | 0 | 0 | 0 |
| May | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| May Total | | 0 | 0 | 0 |
| June | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| June Total | | 0 | 0 | 0 |
| July | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| July Total | | 0 | 0 | 0 |
| August | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| August Total | | 0 | 0 | 0 |
| September | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| September Total | | 0 | 0 | 0 |
| October | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| October Total | | 0 | 0 | 0 |
| November | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| November Total | | 0 | 0 | 0 |
| December | Residential | 0 | 0 | 0 |
| | Small Commercial | 0 | 0 | 0 |
| December Total | | 0 | 0 | 0 |
| Grand Total | | 43 | 16 | 59 |

Overall, the total number of disconnections completed is lower when comparing to prior years due to the COVID-19 pandemic and temporary suspension of collection activity.

**D. Number of disconnected customers restored to service by entering into a payment plan.**

**Table 23**

| Month | Residential | Small Commercial | Large Commercial | Total |
|---|---|---|---|---|
| January | 1 | 0 | 0 | 1 |
| February | 12 | 0 | 0 | 12 |
| March | 4 | 0 | 0 | 4 |
| April | 0 | 0 | 0 | 0 |
| May | 0 | 0 | 0 | 0 |
| June | 0 | 0 | 0 | 0 |
| July | 0 | 0 | 0 | 0 |
| August | 0 | 0 | 0 | 0 |
| September | 0 | 0 | 0 | 0 |
| October | 0 | 0 | 0 | 0 |
| November | 0 | 0 | 0 | 0 |
| December | 0 | 0 | 0 | 0 |
| Totals | 17 | 0 | 0 | 17 |

# VIII. REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES 7826.1600

**Minnesota Rule 7826.1600, Reporting Service Extension Request Response Times, requires utilities to provide a report on service extension request response times.**

In compliance with this rule, Otter Tail provides in **Table 24** below its report of service extension request response times by customer class for each calendar month, in the following categories:

**A. The number of customers requesting service to a location not previously served by Otter Tail and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service, shown in Table 24.**

**B. The number of customers requesting service to a location previously served by the utility but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service, shown in Table 24.**

**Table 24**

**7826.1600 - Otter Tail Power Company**
**Service Extension Request Response Time Report - 2020**

| Request Type | Days | Large Commercial | Residential | Small Commercial | Grand Total |
|---|---|---|---|---|---|
| Locations not previously served | 0 | | 1 | | 1 |
| | 1 | | | 1 | 1 |
| | 2 | | 2 | 5 | 7 |
| Locations previously served | 0 | | 40 | 2 | 42 |
| | 1 | | 13 | 1 | 14 |
| | 2 | | 6 | 2 | 8 |
| | 3 | | 4 | | 4 |
| January Total | | 0 | 66 | 11 | 77 |
| Locations not previously served | 0 | 1 | | 1 | 2 |
| | 3 | 1 | | | 1 |
| | 5 | | | 1 | 1 |
| Locations previously served | 0 | | 31 | | 31 |
| | 1 | | 19 | | 19 |
| | 2 | | 4 | | 4 |
| | 3 | | 1 | | 1 |
| February Total | | 2 | 55 | 2 | 59 |

| Request Type | Days | Large Commercial | Residential | Small Commercial | Grand Total |
|---|---|---|---|---|---|
| Locations not previously served | 0 | | | 5 | 5 |
| | 1 | | 9 | 2 | 11 |
| | 2 | | 1 | 2 | 3 |
| | 4 | | 1 | | 1 |
| Locations previously served | 0 | | 54 | 6 | 60 |
| | 1 | | 21 | 6 | 27 |
| | 2 | | 1 | | 1 |
| | 3 | | 2 | | 2 |
| March Total | | 0 | 89 | 21 | 110 |
| Locations not previously served | 0 | | 2 | 5 | 7 |
| | 1 | | 3 | | 3 |
| | 2 | | 17 | 2 | 19 |
| | 3 | | | 2 | 2 |
| Locations previously served | 0 | | 109 | 19 | 128 |
| | 1 | | 37 | 6 | 43 |
| | 2 | | 12 | 3 | 15 |
| | 3 | | 2 | 6 | 8 |
| April Total | | 0 | 182 | 43 | 225 |
| Locations not previously served | 0 | | | 5 | 5 |
| | 1 | | 12 | 5 | 17 |
| | 2 | | 5 | 4 | 9 |
| | 3 | | 2 | | 2 |
| | 4 | | 1 | | 1 |
| Locations previously served | 0 | | 128 | 20 | 148 |
| | 1 | | 33 | 7 | 40 |
| | 2 | | 1 | | 1 |
| | 3 | | 1 | 1 | 2 |
| May Totals | | 0 | 183 | 42 | 225 |
| Locations not previously served | 0 | | 3 | 4 | 7 |
| | 1 | | 7 | 5 | 12 |
| | 2 | | 18 | 3 | 21 |
| | 3 | | 2 | | 2 |
| | 9 | | 1 | | 1 |
| Locations previously served | 0 | 1 | 91 | 11 | 103 |
| | 1 | | 28 | 5 | 33 |
| | 2 | | 7 | 1 | 8 |
| | 3 | | 1 | | 1 |
| | 4 | | 2 | | 2 |
| June Totals | | 1 | 160 | 29 | 190 |

| Request Type | Days | Large Commercial | Residential | Small Commercial | Grand Total |
|---|---|---|---|---|---|
| Locations not previously served | 0 | | 4 | 2 | 6 |
| | 1 | | 11 | 1 | 12 |
| | 2 | | 17 | 7 | 24 |
| | 18 | | 1 | | 1 |
| Locations previously served | 0 | | 86 | 7 | 93 |
| | 1 | | 28 | | 28 |
| | 2 | | 7 | 1 | 8 |
| | 3 | | 1 | | 1 |
| July Totals | | 0 | 155 | 18 | 173 |
| Locations not previously served | 0 | | 13 | 2 | 15 |
| | 1 | | 10 | 7 | 17 |
| | 2 | | 9 | 6 | 15 |
| | 3 | | 4 | 1 | 5 |
| | 4 | | 2 | | 2 |
| Locations previously served | 0 | | 94 | 8 | 102 |
| | 1 | | 15 | 2 | 17 |
| | 2 | | 1 | | 1 |
| | 3 | | 3 | | 3 |
| August Totals | | 0 | 151 | 26 | 177 |
| Locations not previously served | 0 | | 15 | 7 | 22 |
| | 1 | | 41 | 4 | 45 |
| | 2 | | 11 | 3 | 14 |
| | 3 | | 3 | | 3 |
| | 4 | | 1 | | 1 |
| Locations previously served | 0 | | 58 | 9 | 67 |
| | 1 | | 28 | 1 | 29 |
| | 2 | | 4 | | 4 |
| September Totals | | 0 | 161 | 24 | 185 |
| Locations not previously served | 0 | 1 | 8 | 4 | 13 |
| | 1 | | 12 | 6 | 18 |
| | 2 | | 13 | 2 | 15 |
| | 3 | | | 2 | 2 |
| Locations previously served | 0 | 1 | 55 | 12 | 68 |
| | 1 | | 22 | 1 | 23 |
| | 2 | | 5 | 1 | 6 |
| | 3 | | | 1 | 1 |
| October Total | | 2 | 115 | 29 | 146 |

| Request Type | Days | Large Commercial | Residential | Small Commercial | Grand Total |
|---|---|---|---|---|---|
| Locations not previously served | 0 | 1 | 7 | 1 | 9 |
| | 1 | | 10 | 10 | 20 |
| | 2 | | 4 | 1 | 5 |
| | 3 | | 2 | 1 | 3 |
| Locations previously served | 0 | | 49 | 5 | 54 |
| | 1 | | 26 | 3 | 29 |
| | 2 | | 2 | 3 | 5 |
| November Totals | | 1 | 100 | 24 | 125 |
| Locations not previously served | 0 | 1 | 70 | 23 | 94 |
| | 1 | 1 | 7 | 5 | 13 |
| | 2 | | 12 | 4 | 16 |
| | 3 | | 2 | 1 | 3 |
| | 4 | | 1 | 1 | 2 |
| Locations previously served | 0 | | 32 | 6 | 38 |
| | 1 | | 15 | 1 | 16 |
| | 2 | | 5 | | 5 |
| | 4 | | 1 | | 1 |
| December Totals | | 2 | 145 | 41 | 188 |
| Grand Total | | 8 | 1,562 | 310 | 1,880 |

# IX. REPORTING CALL CENTER RESPONSE TIMES 7826.1700

**Minnesota Rule 7826.1700, Reporting Call Center Response Times, requires utilities to provide a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of information.**

In compliance with this rule, Otter Tail provides its report of call center response times for 2020 in **Table 25**. **Figure 10** shows a historical graph showing the percent of Minnesota calls answered within 20 seconds.

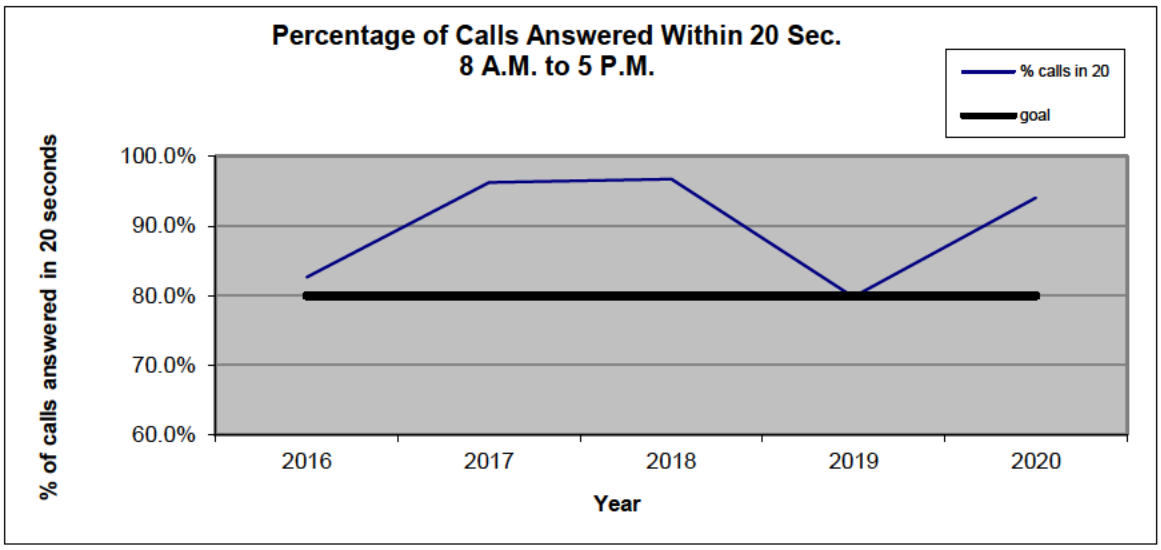
**Table 25**

| Month | Offered | Calls Abandoned | Calls Answered after 20 Seconds | Answered within 20 Seconds | Percent Answered within 20 seconds[1] |
|---|---|---|---|---|---|
| January - 2020 | 4,597 | 5 | 100 | 4,492 | 97.72% |
| February - 2020 | 4,096 | 0 | 66 | 4,030 | 98.39% |
| March - 2020 | 4,320 | 2 | 68 | 4,250 | 98.38% |
| April - 2020 | 4,627 | 2 | 114 | 4,511 | 97.49% |
| May - 2020 | 3,970 | 0 | 42 | 3,928 | 98.94% |
| June - 2020 | 5,660 | 36 | 431 | 5,193 | 91.75% |
| July -2020 | 5,738 | 12 | 224 | 5,502 | 95.89% |
| August - 2020 | 4,906 | 19 | 293 | 4,594 | 93.64% |
| September - 2020 | 4,577 | 29 | 467 | 4,081 | 89.16% |
| October - 2020 | 4,653 | 49 | 719 | 3,885 | 83.49% |
| November - 2020 | 3,830 | 30 | 323 | 3,477 | 90.78% |
| December - 2020 | 4,206 | 8 | 250 | 3,948 | 93.87% |
| Total | 55,180 | 192 | 3,097 | 51,891 | 94.04% |

Otter Tail operates a call center using agents located in nine office locations across our entire service territory. Agents in these office locations answer calls from our Minnesota, North Dakota, and South Dakota customers. With our telecommunications system, our auto attendant allows customers to select the state in which the account or service the customer is calling to inquire about. The auto attendant for selecting the state is for reporting purposes only.

In mid-March of 2020, in response to the COVID-19 pandemic, we moved all call center team members to work remotely from home. Our agents were able to maintain a high service standard for our customers to ensure that our transition to working remotely, did not negatively impact our customers.

**Figure 10**


Percentage of Calls Answered Within 20 Sec.
8 A.M. to 5 P.M.
% calls in 20
goal
% of calls answered in 20 seconds
100.0%
90.0%
80.0%
70.0%
60.0%
2016
2017
2018
2019
2020
Year

# X. REPORTING EMERGENCY MEDICAL ACCOUNT STATUS 7826.1800

**Minnesota Rule 7826.1800, Reporting Emergency Medical Account Status, requires utilities to provide a report that includes the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098 subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reason for each denial.**

In compliance with this rule, Otter Tail reports that during 2020 Otter Tail had 6 Minnesota customers request emergency medical account status. Otter Tail granted this status to all 6 customers.

# XI. REPORTING CUSTOMER DEPOSITS 7826.1900

**Minnesota Rule 7826.1900, Reporting Customer Deposits, requires utilities to provide a report on the number of customers who were required to make a deposit as a condition of receiving service.**

In compliance with this rule, Otter Tail reports that 297 customers were required to make a deposit as a condition of receiving service during 2020. The number of deposit requests decreased by 355 when compared to 2019. The decrease has a direct correlation with suspending collection activities due to the COVID-19 pandemic.

# XII. REPORTING CUSTOMER COMPLAINTS 7826.2000

**Minnesota Rule 7826.2000, Reporting Customer Complaints, requires utilities to provide a detailed report on complaints by customer class and calendar month.**

In compliance with this rule, Otter Tail provides the following information on complaints the Company received during 2020.

**A & B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of the customer complaints.**

**Table 26**

| Complaint Type | Total | Percent of Total |
|---|---|---|
| Alleged Billing Errors | 0 | 0.00% |
| Load Control | 0 | 0.00% |
| High Bills | 9 | 30.00% |
| Inaccurate Meter reading | 1 | 3.33% |
| Tree Trimming | 0 | 0.00% |
| Other | 19 | 63.33% |
| Property Damage | 1 | 3.33% |
| | 30 | 100.00% |

*Other – this category contains any complaints not included within the various complaint sections in our Customer Information System. The types of complaints included in the "Other" category in 2020 included such things as, planned outages, third-party meter readers payment or payment options, and reliability.

**C. The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.**

**Table 27**

| 2020 | | |
|---|---|---|
| **Resolved by** | **Total** | **Percentage** |
| (1) Resolved on Initial Inquiry | 24 | 80% |
| (2) Resolved within 10 days | 4 | 13% |
| (3) Resolved in greater than 10 days | 2 | 7% |
| Grand Total | 30 | 100.00% |

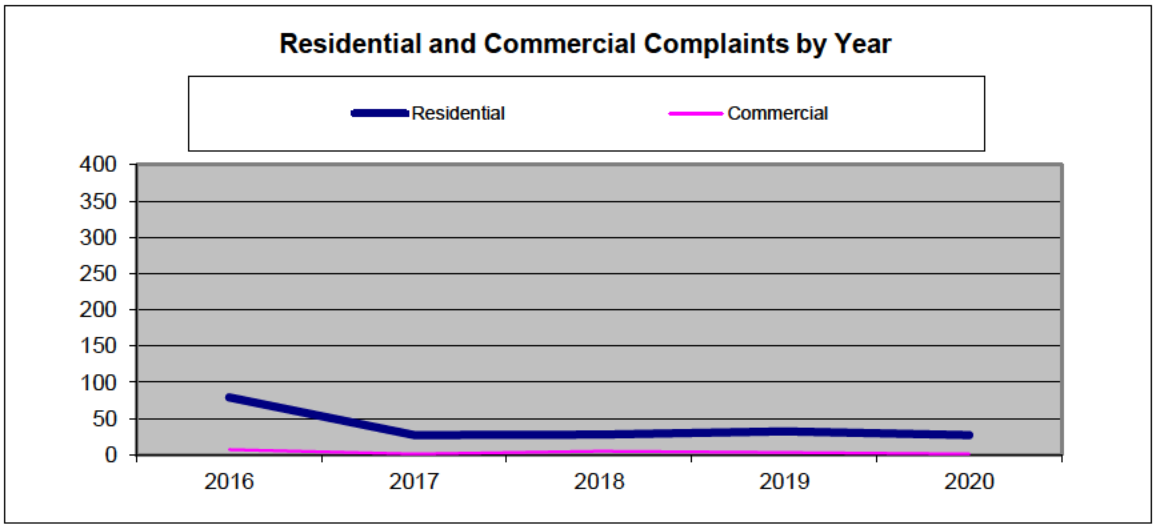
**D. The number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise, (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility or (4) refusing to take the action the customer requested.**

**Table 28**

| Action Taken | Total | Percentage |
|---|---|---|
| (1) Took action the Customer requested | 14 | 46.67% |
| (2) Provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of Otter Tail | 8 | 26.67% |
| (3) Took an action the customer and the utility agree is an acceptable compromise | 8 | 26.67% |
| (4) Refused to take action the customer requested | 0 | 0% |
| Grand Total | 30 | 100.00% |

**Figure 11** below is a graph showing complaints by customer class for the previous five years.

**Figure 11**



### E. The number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

Otter Tail received four customer complaints in 2020 that were forwarded from the Commission's Consumer Affairs Office, all of which have been resolved. The number of complaints received in 2020 decreased in comparison to 2019.

**Table 29**

| | 2019 | 2020 |
|---|---|---|
| Customer Complaints | 13 | 4 |

## Reporting Major Service Interruptions Summary

***Minnesota Rule 7826.0500, Subpart 1g, required utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions.***

*Per PUC order dated December 18, 2020 in E017/M-20-401 PUC granted a variance to MN Rule 7826.0500 Subpart 1.G. Require utilities to file a summary table that includes the information contained in the reports, similar to Attachment G. in Xcel's filing (E002/M-20-406).*

| | Feeder | Primary Event # | Begin Time | Completion Time | Duration Min. | Customers Out | Region | Email sent to CAO |
|---|---|---|---|---|---|---|---|---|
| | **JANUARY = 1 qualifying event, 0 events with no email** | | | | | | | |
| 1 | Rush Lake & Otter Tail Lake Feeder | | 1/11/2020 6:04 | 1/11/2020 8:44 | 160 | 1055 | | x |
| | **FEBRUARY = 0 qualifying events** | | | | | | | |
| | **MARCH = 0 qualifying events** | | | | | | | |
| | **APRIL = 4 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Clitheral Substation | | 4/1/2020 23:59 | 4/2/2020 3:30 | 211 | 450 | | x |
| | Vining Feeder | | 4/1/2020 23:59 | 4/2/2020 9:09 | 550 | 150 | | x |
| 2 | Crookston Enbridge Substation | | 4/2/2020 14:47 | 4/2/2020 18:46 | 239 | 5 | | x |
| | Crookstron Barrette St North Feeder | | 4/2/2020 14:47 | 4/2/2020 17:06 | 139 | 528 | | x |
| | T 13537 Transformer | | 4/2/2020 14:47 | 4/2/2020 16:44 | 117 | 1 | | x |
| 3 | Red Lake Falls East Substation | | 4/3/2020 4:26 | 4/3/2020 6:50 | 144 | 819 | | x |
| 4 | Argyle Substation | | 4/7/2020 6:04 | 4/7/2020 8:16 | 132 | 568 | | x |
| | **MAY = 0 qualifying events** | | | | | | | |
| | **JUNE = 4 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Hoot Lake Substation | | 6/9/2020 14:23 | 6/9/2020 16:18 | 115 | 559 | | x |
| | Farwell, Cyrus, and Kensington Substations | | 6/9/2020 14:28 | 6/9/2020 19:46 | 318 | 572 | | x |
| | Fergus Falls Northeast Substation | | 6/9/2020 14:32 | 6/9/2020 16:30 | 118 | 1172 | | x |
| | Fergus Falls Southeast Substation | | 6/9/2020 14:35 | 6/9/2020 15:54 | 79 | 547 | | x |
| | Aurdal Rural Wall Lake Substation | | 6/9/2020 14:35 | 6/9/2020 16:42 | 127 | 131 | | x |
| | Rothsay, Elizabeth, and Erhard Substations | | 6/9/2020 14:35 | 6/9/2020 15:57 | 82 | 896 | | x |
| | Pelican Rapids West Substation | | 6/9/2020 14:49 | 6/9/2020 15:53 | 64 | 1203 | | x |
| 2 | Otter Outlet Substation | | 6/15/2020 14:35 | 6/15/2020 17:28 | 173 | 1387 | | x |
| 3 | Argyle Substation | | 6/17/2020 20:16 | 6/17/2020 21:43 | 87 | 568 | | x |
| 4 | Fertile Substation | | 6/17/2020 22:37 | 6/18/2020 12:27 | 110 | 796 | | x |
| | Beltrami Junction | | 6/17/2020 22:37 | 6/18/2020 12:27 | 110 | 6 | | x |
| | Beltrami and Lockhart Feeder | | 6/17/2020 22:37 | 6/18/2020 12:27 | 110 | 24 | | x |
| | Beltrami Junction Beltrami Rural North Feeder | | 6/17/2020 22:37 | 6/18/2020 12:27 | 110 | 7 | | x |
| | **JULY = 3 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Buse South SW Feeder | | 7/8/2020 16:33 | 7/8/2020 19:12 | 159 | 687 | | x |
| | Erdahl Melby Ashby Main Feeder | | 7/8/2020 16:56 | 7/8/2020 18:28 | 92 | 535 | | x |
| 2 | Fergus Falls NE High School Feeder | | 7/19/2020 11:41 | 7/19/2020 12:43 | 62 | 1172 | | x |
| 3 | Wheaton | | 7/26/2020 1:40 | 7/26/2020 4:05 | 145 | 1475 | | x |
| | Dumont | | 7/26/2020 1:40 | 7/26/2020 4:05 | 145 | 122 | | x |
| | **AUGUST = 3 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Canby NE | | 8/8/2020 12:40 | 8/8/2020 16:18 | 218 | 718 | | x |
| | Canby SW West Feeder | | 8/8/2020 12:40 | 8/8/2020 14:23 | 103 | 296 | | x |
| | Canby SW East Feeder | | 8/8/2020 12:40 | 8/8/2020 14:12 | 92 | 655 | | x |
| | Canby SW Elevator Feeder | | 8/8/2020 12:40 | 8/8/2020 14:12 | 92 | 327 | | x |
| 2 | Kensington | | 8/14/2020 16:07 | 8/14/2020 17:39 | 92 | 297 | | x |
| | Farwell | | 8/14/2020 16:07 | 8/14/2020 17:39 | 92 | 41 | | x |
| | Cyrus | | 8/14/2020 16:07 | 8/14/2020 17:20 | 73 | 233 | | x |
| 3 | Kerkhoven East Feeder: East to OCR 635 | | 8/24/2020 3:00 | 8/24/2020 10:40 | 460 | 308 | | x |
| | Kerkhoven East Feder: Pennock | | 8/24/2020 3:00 | 8/24/2020 10:40 | 460 | 246 | | x |
| | Kerkhoven East Feeder: Salem | | 8/24/2020 3:08 | 8/24/2020 10:40 | 452 | 15 | | x |
| | Kerhoven East Feeder: Sundburg | | 8/24/2020 3:00 | 8/24/2020 10:40 | 460 | 111 | | x |
| | Kerkhoven West Feeder: N Rural | | 8/24/2020 2:58 | 8/24/2020 10:40 | 462 | 7 | | x |
| | Kerkhoven West Feeder: West | | 8/24/2020 3:00 | 8/24/2020 10:40 | 460 | 141 | | x |
| | Hancock | | 8/24/2020 2:51 | 8/24/2020 4:02 | 71 | 491 | | x |
| | Murdock | | 8/24/2020 2:54 | 8/24/2020 7:53 | 299 | 176 | | x |
| | DeGraff | | 8/24/2020 2:54 | 8/24/2020 8:18 | 324 | 104 | | x |

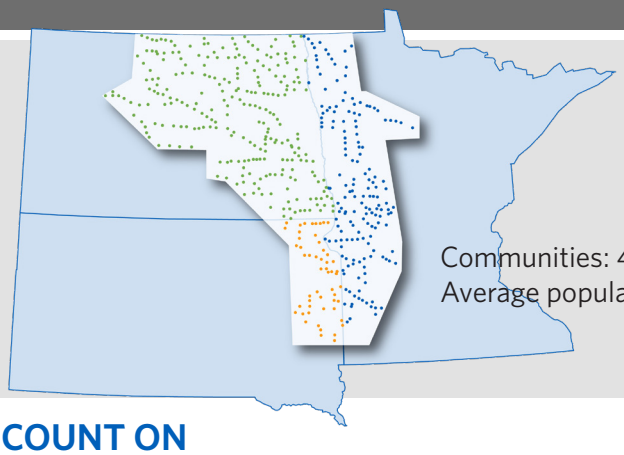
| | Feeder | Primary Event # | Begin Time | Completion Time | Duration Min. | Customers Out | Region | Email sent to CAO |
|---|---|---|---|---|---|---|---|---|
| | **SEPTEMBER = 2 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Donnelly | | 9/9/2020 23:48 | 9/10/2020 1:18 | 90 | 227 | | x |
| | Herman | | 9/9/2020 23:48 | 9/10/2020 1:18 | 90 | 617 | | x |
| | Nashua Tintah | | 9/9/2020 23:48 | 9/10/2020 4:01 | 253 | 68 | | x |
| 2 | Buse South - SW Feeder Section (Fergus Falls) | | 9/27/2020 14:15 | 9/27/2020 16:01 | 106 | 687 | | x |
| | **OCTOBER = 0 qualifying events** | | | | | | | |
| | **NOVEMBER = 1 qualifying event, 0 events with no email** | | | | | | | |
| 1 | Red Lake Falls East St. Hilaire Feeder | | 11/4/2020 17:00 | 11/4/2020 21:44 | 284 | 203 | | x |
| | Red Lake Falls East North Feeder | | 11/4/2020 17:00 | 11/4/2020 21:44 | 284 | 356 | | x |
| | **DECEMBER = 3 qualifying events, 0 events with no email** | | | | | | | |
| 1 | Winger Substation | | 12/13/2020 22:21 | 12/13/2020 23:22 | 61 | 211 | | x |
| | Bejou Substation | | 12/13/2020 22:21 | 12/13/2020 23:22 | 61 | 74 | | x |
| | Waubun Substation | | 12/13/2020 22:21 | 12/13/2020 23:22 | 61 | 321 | | x |
| 2 | Otter Outlet Substation | | 12/19/2020 17:09 | 12/19/2020 18:11 | 62 | 610 | | x |
| 3 | Barry - Main Feeder | | 12/23/2020 5:00 | 12/23/2020 7:20 | 140 | 22 | | x |
| | Beardsley - Main Feeder | | 12/23/2020 5:00 | 12/23/2020 7:20 | 140 | 179 | | x |
| | Browns Valley - North Feeder | | 12/23/2020 5:00 | 12/23/2020 7:20 | 140 | 214 | | x |
| | Browns Valley - South Feeder | | 12/23/2020 5:00 | 12/23/2020 7:20 | 140 | 241 | | x |

2020 MN SAFETY, RELIABILITY, AND SERVICE QUALITY

# Our focus on reliable electricity and timely, courteous customer service

## OUR MISSION

To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and **to improve the quality of life in the areas in which we do business.**



Communities: 422
Average population: 400

## RELIABLE ELECTRICITY CUSTOMERS CAN COUNT ON

We strive to minimize the frequency and duration of service interruptions. And we deploy field personnel as safely and quickly as possible to restore power to customers when interruptions occur.

Two of the ways in which we measure our reliability are the average number of interruptions and average length of time our customers were without power.

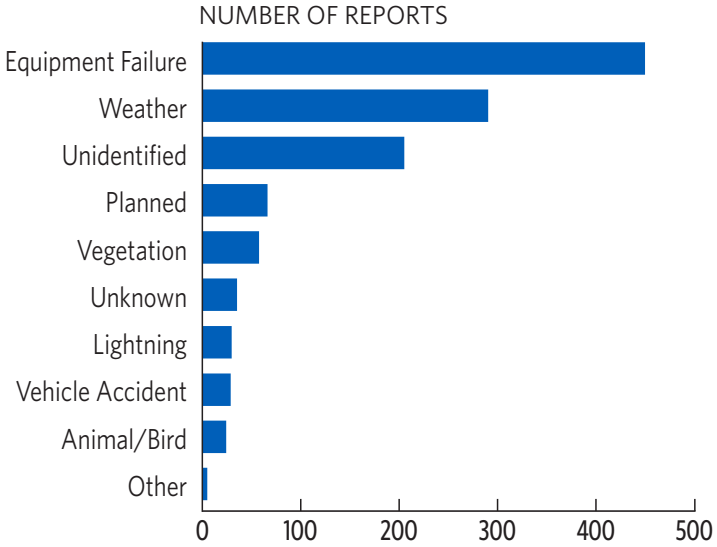
In 2020 **1.6%** of our customers experienced an interruption greater than **six hours**.

Also, **8.4%** of our customers experienced four or more interruptions lasting greater than **five minutes**.

## SAFETY

We reported no incidents in 2020 in which there were injuries that required medical attention as a result of downed wires or other electrical system failures.

## WHAT CAUSES INTERRUPTIONS?




Keeping our lines clear of trees and other vegetation helps ensure safe and reliable service. We trimmed **900 miles** of transmission lines in 2020.

## OUTAGE PREVENTION

As part of our long-term reliability strategy, we perform critical analyses of our transmission and distribution systems.

**We'll continue investing in innovative, resourceful ways to create a more resilient regional transmission grid, including:**

- identifying areas requiring proactive maintenance.
- integrating geographic information system data.
- expanding continuous improvement workshops to improve efficiencies and processes.

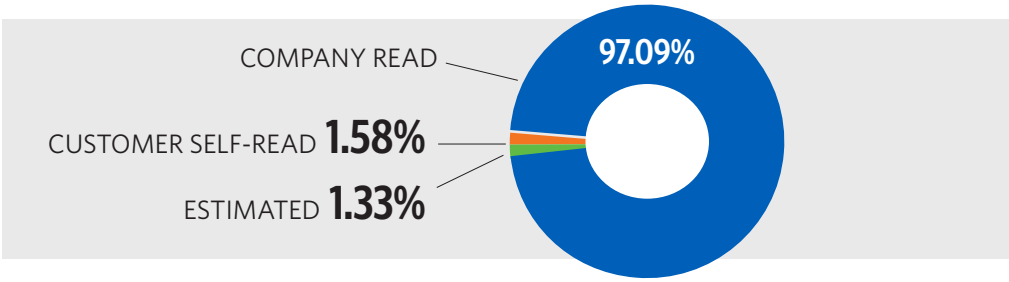
## CUSTOMER SERVICE TEAM

**We're here so customers can focus on what matters most.**

If there is a power outage, our customer service team is dispersed throughout the communities we serve. In 2020 we had **182 linemen and service representatives** throughout our territory available to safely and quickly restore power to our customers.

**Company-read meters**

Our service representatives and our contracted meter readers read almost all of our residential meters to ensure accuracy in billing.




## HIGH SERVICE STANDARDS

Our **29 customer service representatives** and lead customer service representatives are ready to assist our customers.

In 2020 our team received over **55,000 customer calls** during business hours. Of those, we answered **94%** within **20 seconds**.

We promoted several resources on more than **17,000 outbound calls** throughout our service territory to customers in need, offering:

- Payment plans.
- Protections under Cold Weather Protection.
- Energy assistance options.


## MOVING?
### WE TURN ON ELECTRICITY QUICKLY!

**93%**
**of locations we've previously served receive electricity within 24 hours**

# CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2021**
**Docket No. E017/M-21-**

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**
**Annual Report**

Dated this **1st** day of **April, 2021**

*/s/ CARLY HAIBY*
Carly Haiby, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

| Member Name | Email | Company Name | Address | Delivery Method | View Trade Secret |
|---|---|---|---|---|---|
| Ray Choquette | rchoquette@agp.com | Ag Processing Inc. | 12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047 | Electronic Service | No |
| 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 | No |
| Brooke Cooper | bcooper@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No |
| James C. Erickson | jericksonkbc@gmail.com | Kelly Bay Consulting | 17 Quechee St Superior, WI 54880-4421 | Electronic Service | No |
| Sharon Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No |
| Jessica Fyhrie | jfyhrie@otpco.com | Otter Tail Power Company | PO Box 496 Fergus Falls, MN 56538-0496 | Electronic Service | No |
| Shane Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No |
| Douglas Larson | dlarson@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No |
| James D. Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No |
| Kavita Maini | kmaini@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No |
| Andrew Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No |
| Matthew Olsen | molsen@otpco.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No |
| Wendi Olson | wolson@otpco.com | Otter Tail Power Company | 215 South Cascade Fergus Falls, MN 56537 | Electronic Service | No |
| 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 | No |
| Larry L. Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No |
| Will Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7 h Pl E Ste 350 Saint Paul, MN 55101 | Electronic Service | No |
| Cary Stephenson | cStephenson@otpco.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No |
| Stuart Tommerdahl | stommerdahl@otpco.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No |