

August 16, 2021

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

RE: **Comments of the Minnesota Department of Commerce, Division of Energy Resources**
Docket No. E017/M-21-225

Dear Mr. Seuffert:

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

Otter Tail Power Company's Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2021.

The report was filed on April 1, 2021 by:

Wendi Olson
Regulatory Compliance Specialist
Otter Tail Power Company
215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496

The Department recommends that the Commission **accept** Otter Tail Power Company's (OTP or the Company) report. The Department is available to answer any Commission questions.

Sincerely,

/s/ MICHAEL N. ZAJICEK
Rates Analyst

MNZ/ja
Attachment



Before the Minnesota Public Utilities Commission

Comments of the Minnesota Department of Commerce Division of Energy Resources

Docket No. E017/M-21-225

I. BACKGROUND

Minnesota Rules, Chapter 7826 (effective January 28, 2003) were developed as a means for the Minnesota Public Utilities Commission (Commission) to establish safety, reliability, and service quality standards for utilities “engaged in the retail distribution of electric service to the public” and to monitor their performance as measured against those standards. There are three main annual reporting requirements set forth in the rule. These are:

- (1) the annual safety report (Minnesota Rules, part 7826.0400),
- (2) the annual reliability report (Minnesota Rules, parts 7826.0500, subp. 1 and 7826.0600, subp. 1), and
- (3) the annual service quality report (Minnesota Rules, part 7826.1300).

In addition to the rule requirements, the Commission’s December 18, 2020 Order in Docket No. E017/M-20-401 froze Otter Tail Power Company’s (OTP or the Company) goals at the 2013 levels and also set service territory-wide reliability standards based on the IEEE benchmarking second quartile for medium utilities. Meanwhile the Commission’s January 28, 2020 Order in Docket No. E017/M-19-260 required the Company to include the following in its next annual filing:

- a. Non-normalized SAIDI, SAIFI, and CAIDI^[1] values;
- b. SAIDI, SAIFI, and CAIDI values calculated using the IEEE [Institute of Electrical and Electronics Engineers] 2.5 beta method;
- c. MAIFI [Momentary Average Interruption Frequency Index], normalized and non-normalized;
- d. CEMI [Customers Experiencing Multiple Interruptions] – at normalized and non-normalized outage levels of 4, 5, and 6;
- e. The highest number of interruptions experienced by any one customer;
- f. CELI [Customers Experiencing Lengthy Interruptions] – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours;
- g. The longest experienced interruption by any one customer (or feeder);
- h. A breakdown of field versus office staff required;

¹ SAIDI = System Average Interruption Duration Index, SAIFI = System Average Interruption Frequency Index, CAIDI = Customer Average Interruption Duration Index.

- i. Estimated restoration times;
- j. IEEE benchmarking;
- k. Performance by customer class; and
- l. More discussion of leading causes of outages and mitigation strategies.

Additionally, the Commission's December 18, 2020 Order required the Company to propose a transition to the full benchmarking approach to setting reliability standards, including a discussion of the definition of work centers, benchmarking for individual work centers, and other considerations. Additionally, the Commission also required the Company to report information on the number of website visits, logins to electronic customer communication platforms, emails from customers, and types of emails from customers.

On April 1, 2021, OTP filed its *2020 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2021* (Annual Report) in Docket No. E017/M-21-225 to comply with the Commission's December 18, 2020 Order, the January 28, 2020 Order, and the requirements of Minnesota Rules Chapter 7826.

On April 12, 2021, the Commission filed a *Notice of Comment Period* requesting that parties respond to the following questions:

1. Should the Commission accept Minnesota Power's, Otter Tail Power's, and Xcel Energy's 2020 Safety, Reliability, and Service Quality Metrics reports?
2. Should the Commission approve the utility's proposed transition to benchmarking for its annual reliability numbers, including at a work center level?
3. Should the Commission take any action on the engagement plans related to Emergency Medical Account status?
4. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?
5. Are there other issues or concerns related to this matter?

II. SUMMARY OF REPORT AND DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed OTP's Annual Report to assess compliance with Minnesota Rules, Chapter 7826 and the Commission's December 18, 2020 Order. The Department used information from past annual reports to facilitate identification of issues and trends regarding OTP's performance.

The Department provides:

- responses to the Commission's questions;
- a summary of our review of OTP's 2020 Safety, Reliability and Service Quality Reports;
- a discussion of the Company's reliability standards for 2021; and
- a discussion of the Company's compliance with other Commission Orders.

A. RESPONSE TO COMMISSION QUESTIONS

a. Should the Commission Accept OTP's Safety, Reliability and Service Quality Metrics Reports?

The Department recommends that the Commission accept OTP's Annual Report as the Company has provided the required information. The Department is awaiting additional information regarding the Company's proposed 2021 reliability metrics before making a recommendation regarding that aspect of OTP's filing. The Company will be supplementing its petition sometime in the fall of 2021. That supplement will include reliability goals developed using the IEEE benchmarking methodology. The Department hopes to file supplemental comments regarding its review of that information soon after OTP files that information.

b. Should the Commission approve the utility's transition to benchmarking for its annual reliability numbers, including at a work center level?

The Department supports including the IEEE benchmarking analysis in the annual reports and is open to using the IEEE benchmarking analysis to set utilities annual reliability targets if the data is available for Department analysis. The Department believes it is important for the that the data used to calculate the IEEE benchmarks be available for analysis if any issues with utility performance arise.

The Department also believes that the continued use of work centers is important. If the utilities continue to report performance based on work center this allows the Commission to obtain a more accurate picture of which portions of the utilities service territories are causing issues and provides more information on the specific causes within each work center. Eliminating the more granular goals would reduce the Commission's ability to pinpoint potential problem areas, and may allow utilities to deemphasize the areas in their service territories where service reliability is poor by combining them with areas in which service reliability is average or above average. This approach also appears to be different from the Commission's interest in locational reliability and locational equity expressed in Docket No. E002/M-17-401. Maintaining the current process of establishing work center goals would also not require a variance from Minn. Rules 7826.0500 Subp 1 A-C and Subp 2.

The IEEE analysis is important in that it provides the Commission with a "comparable" group analysis for each of the utilities. This perspective has been lacking historically, so the Department supports the addition of this reporting requirement.

In addition, given that the IEEE benchmarking data is not available until the 3rd quarter of the following year, the Department supports a process that the utilities make a supplemental filing within 20 days of receiving the benchmarking data from IEEE. The Department and other interested parties would then have an opportunity to respond to that new information, if warranted. Ultimately, the IEEE benchmarking data will add valuable information and context as the annual reports are processed.

c. Should the Commission take any action on the engagement plans related to Emergency Medical Account status?

The Department generally believes that the Utilities engagement plans should be designed so that most customers are aware the program exists. In response to the Commission's December 18, 2020, Order in the 2020 in Dockets. Nos, E002/M-20-406, E017/M-20-401, and E015/M-20-404, Xcel, OTP, and Minnesota Power each submitted compliance filings detailing each utilities engagement plans for Emergency Medical Account protections.

With regards to OTP, the January 18, 2021 Compliance filing stated that OTP plans to increase visibility of its program by including bill inserts in its September bills and in its new customer information packet, and OTP stated it intends to enhance the customer protections page of OTP's website to include information regarding medical necessary equipment and the qualifications for Emergency Medical Account status. OTP also stated that it will send communications to local hospitals regarding its protections for medically necessary equipment so as to provide awareness of the program for hospital and clinic employees. The Department concludes that OTP's proposals for its engagement plan for its Emergency Medical Accounts is reasonable.

Additionally, Xcel, Minnesota Power, and OTP, have collaborated with the Clean Energy Resources Team, and Citizens Utility Board to place links on their low-income energy assistance pages to each utilities' respective pages promoting energy assistance and medical necessary protections.

d. Do the additional measures of electronic utility-customer interactions provide a more complete picture of how customers experience utilities' customer service?

Yes, the Department believes that more information on customer interactions, particularly via the internet, are useful. For instance, OTP reported 1688 contacts through OTP's website's contact us function, with inquiries about a large number of different topics, and approximately 2.35 million website visits in 2020. While customers still call in great volumes, with OTP recording approximately 55,000 calls in 2020, it is clear that website interactions are substantial and provide customers with a great deal of information. Therefore, the Department concludes that the additional measures of electronic utility-customer interactions do help provide a more complete picture of how customers experience utilities' service.

Annual service quality reports provide insight into whether ratepayers are receiving safe and reliable service, as well as acceptable physical, financial, and call center services. Yet increasing levels of service are being provided online through utilities' websites, and often are the first place ratepayers connect with their utility.

To build on the Commission's order in the 2020-filed service quality dockets,² the Department requests that the Company provide additional information in their annual reports for the next two reporting cycles, in order build baselines for web-based service metrics. Specifically, the Department requests that the utilities provide, at a minimum, the following:

- The percentage uptime, to the second decimal, of the utility's:
 - general website
 - payment services
 - outage map and/or outage information page
- the error rate percentage, to the third decimal, of the utility's payment services.
 - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

Additionally, the Department requests the utility discuss in Reply Comments whether it:

- has a chat feature on its website, and whether that chat feature is:
 - live and staffed by internal utility employees;
 - live and staffed by third-party vendor employees;
 - a chat bot; or
 - something else and/or a combination of the above options.
- uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

Gathering this data and information in this and next year's filing, across all utilities, should provide the Department with reasonable basis to recommend specific metrics and/or recommendations.

e. Are there other issues or concerns related to this matter?

The Department does not have any additional concerns at this time.

² Docket Nos. E-002/M-20-406, E-017/M-20-401, and E-015/M-20-404 Commission Order issued December 18, 2020.

B. ANNUAL SAFETY REPORT

The annual safety report consists of two parts:

- A. a summary of all reports filed with the United States Occupational Safety and Health Administration (OSHA) and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry (OSHD) during the calendar year; and
- 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 electrical system failures and all remedial action taken as a result of any injuries or property damage described.

The following tables are a compilation of OTP's summaries of the reports the Company filed with OSHA and OSHD for the previous 12 years.

Table 1: Number of Cases

| | Number of Deaths | Number of Cases with Days Away from Work | Number of Cases with Job Transfer or Restriction | Other Recordable Cases |
|------|-------------------------|---|---|-------------------------------|
| 2008 | 0 | 0 | 2 | 12 |
| 2009 | 0 | 2 | 0 | 15 |
| 2010 | 0 | 4 | 0 | 23 |
| 2011 | 0 | 3 | 1 | 15 |
| 2012 | 0 | 1 | 7 | 11 |
| 2013 | 0 | 3 | 4 | 6 |
| 2014 | 0 | 2 | 2 | 16 |
| 2015 | 0 | 3 | 7 | 17 |
| 2016 | 0 | 3 | 1 | 8 |
| 2017 | 0 | 1 | 1 | 10 |
| 2018 | 0 | 1 | 2 | 14 |
| 2019 | 0 | 3 | 3 | 4 |
| 2020 | 0 | 2 | 6 | 1 |

Table 2: Number of Days

| | Days of Job Transfer or Restriction | Days Away from Work |
|------|--|--------------------------------|
| 2008 | 25 | 0 |
| 2009 | 0 | 14 |
| 2010 | 0 | 98 |
| 2011 | 6 | 39 |
| 2012 | 6 | 39 |
| 2013 | 147 | 15 |
| 2014 | 48 | 14 |
| 2015 | 349 | 90 |
| 2016 | 240 | 10 |
| 2017 | 41 | 11 |
| 2018 | 152 | 6 |
| 2019 | 239 | 60 |
| 2020 | 451 | 17 |

Table 3: Injury & Illness Types

| | Injuries | Skin Disorders | Respiratory Conditions | Poisonings | All Other Illnesses |
|------|-----------------|---------------------------|-----------------------------------|-------------------|--------------------------------|
| 2008 | 14 | 0 | 0 | 0 | 0 |
| 2009 | 16 | 0 | 0 | 0 | 1 |
| 2010 | 20 | 0 | 0 | 2 | 1 |
| 2011 | 18 | 1 | 0 | 0 | 0 |
| 2012 | 19 | 0 | 0 | 0 | 0 |
| 2013 | 13 | 0 | 0 | 0 | 0 |
| 2014 | 20 | 0 | 0 | 0 | 0 |
| 2015 | 23 | 0 | 0 | 0 | 1 |
| 2016 | 12 | 0 | 0 | 0 | 0 |
| 2017 | 12 | 0 | 0 | 0 | 0 |
| 2018 | 14 | 0 | 0 | 0 | 0 |
| 2019 | 10 | 0 | 0 | 0 | 0 |
| 2020 | 9 | 0 | 0 | 0 | 0 |

In each report since the inception of Minnesota Rules, Chapter 7826 reporting requirements, OTP has reported that no incidents in which an injury requiring medical attention due to system failure have occurred.

The following table summarizes OTP's most recent and past reports regarding property damage claims that occurred as a result of downed wires or other electrical system failures.

Table 4: Property Damage Claims

| | Claims | Cause | Total Amount Paid |
|------|---------------|--|--------------------------|
| 2004 | 3 | failed/damaged cable | information not provided |
| 2005 | 1 | failed insulator | information not provided |
| 2006 | 4 | faulty cable | information not provided |
| 2007 | 1 | low clearance | \$1,203.63 |
| 2008 | 3 | equipment failure (2) pole fire/tree (1) | \$6,560.59 |
| 2009 | 4 | truck pulled line down (2) underground cable failure overhead wire failure | \$7,058.34 |
| 2010 | 1 | Farm implement pulled overhead service down | \$220.00 |
| 2011 | 0 | N/A | N/A |
| 2012 | 0 | N/A | N/A |
| 2013 | 1 | Downed Power Lines | \$632.97 |
| 2014 | 5 | Bad Connection, wrong voltage, bad cable, power surge (2) | \$9,383.44 |
| 2015 | 2 | Bad connection; voltage fluctuations | \$1,552.70 |
| 2016 | 1 | Faulty secondary wire | \$277.50 |
| 2017 | 3 | Crop and property damage | \$2,882.00 |
| 2018 | 1 | UG Fault | \$100.00 |
| 2019 | 0 | N/A | N/A |
| 2020 | 0 | N/A | N/A |

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0400.

C. ANNUAL RELIABILITY REPORT

Minnesota Rules, part 7826.0500 requires each utility to file an annual report that includes the following information:

1. reliability performance,
2. storm-normalization method,
3. action plan for remedying any failure to comply with the reliability standards,
4. bulk power supply interruptions,
5. major service interruptions,
6. circuit interruption data (identify worst performing circuit),

7. known instances in which nominal electric service voltages did not meet American National Standards Institute (ANSI) standards,
8. work center staffing levels, and
9. any other relevant information.

1. Reliability Performance

OTP's assigned service territory consists of six work centers.

The following table shows the Company's 2020 reliability performance compared with the goals set by the Commission in Docket No. E017/M-20-401.³

Table 5: OTP's 2020 Reliability Performance Compared with Goals

| Work Center | | 2020 Performance | 2020 Goals |
|------------------|-------|------------------|------------|
| Bemidji | SAIDI | 55.48 | 70.64 |
| | SAIFI | 1.27 | 1.26 |
| | CAIDI | 49.22 | 56.06 |
| Crookston | SAIDI | 140.47 | 69.33 |
| | SAIFI | 1.50 | 1.19 |
| | CAIDI | 93.63 | 58.26 |
| Fergus Falls | SAIDI | 110.48 | 66.97 |
| | SAIFI | 1.42 | 1.11 |
| | CAIDI | 77.57 | 60.33 |
| Milbank | SAIDI | 169.89 | 75.49 |
| | SAIFI | 2.00 | 1.82 |
| | CAIDI | 84.94 | 41.48 |
| Morris | SAIDI | 118.19 | 55.78 |
| | SAIFI | 1.39 | 1.01 |
| | CAIDI | 84.71 | 55.23 |
| Wahpeton | SAIDI | 329.5 | 57.24 |
| | SAIFI | 4.33 | 1.13 |
| | CAIDI | 76.04 | 50.65 |
| All MN Customers | SAIDI | 107.66 | 64.95 |
| | SAIFI | 1.40 | 1.13 |
| | CAIDI | 76.72 | 57.48 |

³ The Department notes that SAIDI = SAIFI * CAIDI.

Shaded cells in Table 5 indicate reliability goals that were not met in 2020. See Section II.B.3 below for a discussion of OTP's 2020 reliability performance.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1A, B, and C.

2. Storm-Normalization Method

OTP calculated its 2020 SAIDI, SAIFI, and CAIDI indices using the IEEE 2.5 beta method for storm normalization. OTP reported that, under the IEEE 2.5 beta method, zero days met the criteria to be considered a Major Event Day. OTP notes that the Company's new interruption monitoring system (IMS) has a smaller historic data base than previous systems, and thus the threshold for what qualifies as a Major Event Day may be artificially high. The Company stated that in 2018, under the old IMS, a weather event on June 29 qualified as a Major Event Day with a accumulated SAIDI of 20 minutes, while the current IMS requires 28.13 accumulated minutes of SAIDI.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1D.

3. Action Plan to Improve Reliability

OTP provided detailed information regarding its failure to meet its 2020 reliability goals. The Company missed goals in all six work centers, or customer service centers (CSCs), in 2020. As an update to the Commission's December 20, 2012 Order in Docket No. E017/M-12-325, the Company provided a discussion of continuing efforts made to improve reliability.⁴

OTP's action plan consisted of an update to past and continuing efforts. The Company noted that, "Overall system improvements will be realized over longer periods of time."

The Department notes that in OTP's Integrated Distribution Plan filing, Docket No. E017/M-19-693, the Company indicated that it expects to greatly increase the amount its spending on age-related equipment replacements in the next few years, which may help system reliability in the future.

4. Bulk Power Supply Interruptions

OTP reported that it sustained one interruption to a Minnesota bulk power supply facility in 2020. The Company stated that "[o]n May 26, 2020 at 2:56 AM, an insulator failed in the GRE Audubon 230KV substation."⁵ This resulted in approximately 5 minutes and 57 seconds of interruption to Minnesota customers served off the line.

⁴ Annual Report, p. 16.

⁵ Annual Report, p. 17.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1F.

5. Major Service Interruptions

On December 18, 2020, the Commission granted OTP a variance to Minnesota rule 7826.0500 Subpart 1g, which requires Ottertail to provide a copy of each report filed under Minnesota Rules, part 7826.0700. Instead, OTP provided a summary table that includes the information contained in the reports.

The Company reported 21 major service interruptions in 2020. The largest major service interruption affected approximately 5,080 customers. OTP stated that the length of the outage, which began approximately at 2:23 p.m. to 7.46 p.m. on June 9, 2020, varied between 1 hour and 4 minutes for some customers and 5 hours and 18 minutes for others.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1G as varied by the Commission.

6. Worst Performing Circuit

OTP identified the worst performing feeder in each work center, including its SAIDI, SAIFI, CAIDI, and MAIFI, the major causes of each feeder's outages, and the remedial measures planned or taken by the Company. The Company indicated that it will be determining its worst performing feeder based on MAIFI in the future.

The Department notes that, according to OTP's annual reports over the years, there is no apparent trend in terms of outage causes or continuing poor performance for any particular feeder. The Department uses historical data to identify potential areas of concerns regarding any feeders that appear multiple times as a worst performing feeder. After reviewing 15 years of historical data, the Department concludes that there is no concern with any specific feeder at this time.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1H.

7. Compliance with ANSI Voltage Standards

OTP provided a table listing the feeders and number of known occurrences where the voltage fell outside the American National Standards Institute (ANSI) voltage range B in 2020. OTP noted that most of the feeders with numerous occurrences were feeders serving a single large customer with a very large load (mostly pipelines). The Department observes no significant trend regarding this metric.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1I.

8. Work Center Staffing Levels

OTP provided information on staffing levels by work center as of December 31, 2020. The following table summarizes total staffing levels over the past 14 years.

Table 6: OTP Work Center Staffing Levels

| | Field | Office | Total |
|------|--------------|---------------|--------------|
| 2007 | 110 | 37 | 147 |
| 2008 | 113 | 39 | 152 |
| 2009 | 110 | 38 | 148 |
| 2010 | 109 | 35 | 144 |
| 2011 | 103 | 32 | 135 |
| 2012 | 107 | 33 | 140 |
| 2013 | 109 | 33 | 142 |
| 2014 | 107 | 33 | 140 |
| 2015 | 114 | 29 | 143 |
| 2016 | 116 | 32 | 148 |
| 2017 | 111 | 43 | 154 |
| 2018 | 123 | 39 | 162 |
| 2019 | 122 | 43 | 165 |
| 2020 | 121 | 45 | 166 |

Given OTP's history of failing to meet many of its reliability goals, the Department is encouraged by the increase in field staff in recent years. The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1J.

9. Other Information

This section of OTP's Annual Report⁶ provided updates on continuing developments from the Company's use of the Interruption Monitoring System (IMS). Specifically, OTP reported that:

- OTP has completed a project to replace its obsolete IMS as it relates to the planned shutdown of cellular 2G service. The implementation of the plan was completed in late 2018 and 2020 was its second full year of use.
- OTP's NextGen IMS and the use of power quality meters will continue to provide optimized and focused deployment of vegetation management and maintenance resources to areas that are identified through its interruption data collection process in the Company's efforts to achieve reliability.

⁶ Annual Report, pages 29-31.

- OTP continues to explore ways to assess reliability performance.
- OTP began an initiative to focus on improving electrical network and infrastructure to improve reliability, customer engagement, and business efficiency by addressing aging infrastructure and preparing for new technologies.

The Department appreciates OTP's efforts and additional information and acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.0500, subp. 1K.

D. PROPOSED RELIABILITY STANDARDS FOR 2021

OTP proposes to use the IEEE Reliability Benchmark Survey Median values for medium sized utilities to set its goals. Additionally, OTP proposes to consolidate the Wahpeton service center into the Fergus Falls service center, and the Milbank service center into the Morris service center. OTP believes that moving to the IEEE Reliability Benchmark Survey for setting goals is a more useful mechanism than basing the reliability goals on a 5-year average as it compares against other utilities performance. Additionally, the Company states that its new IMS system records with greater granularity, resulting in more outages being captured and recorded by the system than the previous measurement methods OTP was using. As such OTP does not believe the outage data for 2019 and 2020 is directly comparable to past performance.

The 2020 IEEE Reliability Benchmark Survey results are not yet available, and OTP stated that it will provide the results in a supplemental filing within 30 days from when the IEEE's 2020 Benchmark Reliability Survey results are completed. For reference the Company provided the 2019 EEI reliability survey results and compared them to OTP's performance.⁷ Table 7 below Compares OTP's 2020 performance with the 2019 IEEE median normalized results for medium sized utilities, the data point that OTP proposes to use to set its future goals.

Table 7: OTP 2020 Performance Compared to 2019 IEEE Results

| | OTP 2020 Minnesota Normalized Performance | 2019 IEEE Median Normalized Medium Sized Utility Results |
|--------------|--|---|
| SAIFI | 1.4 | 1.17 |
| SAIDI | 107.66 | 140 |
| CAIDI | 76.72 | 124 |
| MAIFI | 6.64 | NA |

In the past, the Commission has typically set reliability goals at the 5-year average. However, in the case of OTP, the Commission's December 12, 2014 Order froze OTP's SAIDI, SAIFI, and CAIDI goals at the 2013 levels until the Company improves its reliability performance. The 2013 goals have been in

⁷ Annual Report pages 34-35

place from 2013 through 2020. Thus, the Department reviewed whether the Company's reliability performance improved to the extent that moving back to the 5-year average goal-setting method would be appropriate. Table 8 below shows how many of its eighteen annual goals⁸ OTP has met since 2010.

Table 8: OTP's Reliability Goals⁹

| | | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
|---------------------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|-------|
| Bemidji | SAIDI | 47.85 | 50.65 | 58.74 | 70.64 | 70.64 | 70.64 | 70.64 | 70.64 | 70.64 | 70.64 | 70.64 |
| | SAIFI | 1.08 | 1.11 | 1.16 | 1.26 | 1.26 | 1.26 | 1.26 | 1.26 | 1.26 | 1.26 | 1.26 |
| | CAIDI | 44.31 | 45.74 | 50.64 | 56.06 | 56.06 | 56.06 | 56.06 | 56.06 | 56.06 | 56.06 | 56.06 |
| Crookston | SAIDI | 46.15 | 46.12 | 48.58 | 69.33 | 69.33 | 69.33 | 69.33 | 69.33 | 69.33 | 69.33 | 69.33 |
| | SAIFI | 1.08 | 1.05 | 0.93 | 1.19 | 1.19 | 1.19 | 1.19 | 1.19 | 1.19 | 1.19 | 1.19 |
| | CAIDI | 44.31 | 43.87 | 52.24 | 58.26 | 58.26 | 58.26 | 58.26 | 58.26 | 58.26 | 58.26 | 58.26 |
| Fergus Falls | SAIDI | 58.03 | 64.63 | 69.16 | 66.97 | 66.97 | 66.97 | 66.97 | 66.97 | 66.97 | 66.97 | 66.97 |
| | SAIFI | 1.09 | 1.15 | 1.17 | 1.11 | 1.11 | 1.11 | 1.11 | 1.11 | 1.11 | 1.11 | 1.11 |
| | CAIDI | 53.00 | 56.21 | 59.11 | 60.33 | 60.33 | 60.33 | 60.33 | 60.33 | 60.33 | 60.33 | 60.33 |
| Milbank | SAIDI | 80.00 | 47.97 | 59.24 | 75.49 | 75.49 | 75.49 | 75.49 | 75.49 | 75.49 | 75.49 | 75.49 |
| | SAIFI | 3.00 | 1.35 | 1.57 | 1.82 | 1.82 | 1.82 | 1.82 | 1.82 | 1.82 | 1.82 | 1.82 |
| | CAIDI | 26.67 | 35.57 | 37.73 | 41.48 | 41.48 | 41.48 | 41.48 | 41.48 | 41.48 | 41.48 | 41.48 |
| Morris | SAIDI | 46.62 | 47.84 | 55.71 | 55.78 | 55.78 | 55.78 | 55.78 | 55.78 | 55.78 | 55.78 | 55.78 |
| | SAIFI | 1.10 | 1.13 | 1.12 | 1.01 | 1.01 | 1.01 | 1.01 | 1.01 | 1.01 | 1.01 | 1.01 |
| | CAIDI | 42.47 | 42.26 | 49.74 | 55.23 | 55.23 | 55.23 | 55.23 | 55.23 | 55.23 | 55.23 | 55.23 |
| Wahpeton | SAIDI | 28.91 | 44.92 | 57.00 | 57.24 | 57.24 | 57.24 | 57.24 | 57.24 | 57.24 | 57.24 | 57.24 |
| | SAIFI | 0.43 | 0.84 | 1.15 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 |
| | CAIDI | 67.07 | 53.42 | 49.57 | 50.65 | 50.65 | 50.65 | 50.65 | 50.65 | 50.65 | 50.65 | 50.65 |

As the above table illustrates, OTP has had trouble meeting the majority of its goals since 2010. While the Company was more successful in meeting its goals in 2012 over the previous two years, that limited success was not maintained in 2013. In 2015, OTP accomplished 61 percent of its CSC goals, the most successful performance since 2009. However, the last five years have seen the Company perform poorly in achieving its goals as it has not been above a 50 percent success rate since 2015. The Company has consistently reported over the years that its failure to achieve its reliability goals was primarily due to weather and other issues out of its control. Additionally, the Company states that its new IMS system detects more outages than its old one, and that 2019 and 2020 performance thus appears worse by comparison.

The following figures highlight OTP's SAIDI performance trends for the six CSCs from 2011-2020, including a black trend line to indicate performance patterns overtime. It should be noted that all CSCs other than Bemidji and Fergus Falls show trends of worsening performance.

⁸ The eighteen goals are SAIDI, SAIFI, and CAIDI for all six of the Company's CSCs.

⁹ Shading indicates unmet goal.

Figure 1: Bemidji CSC

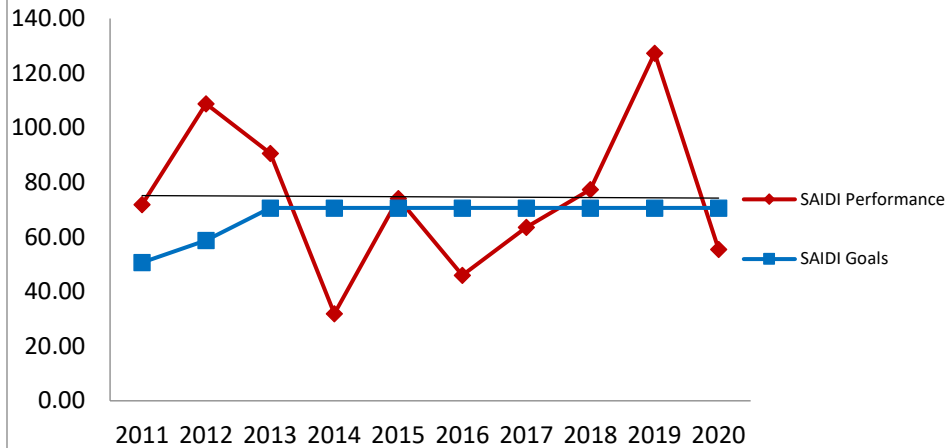


Figure 2: Crookston CSC

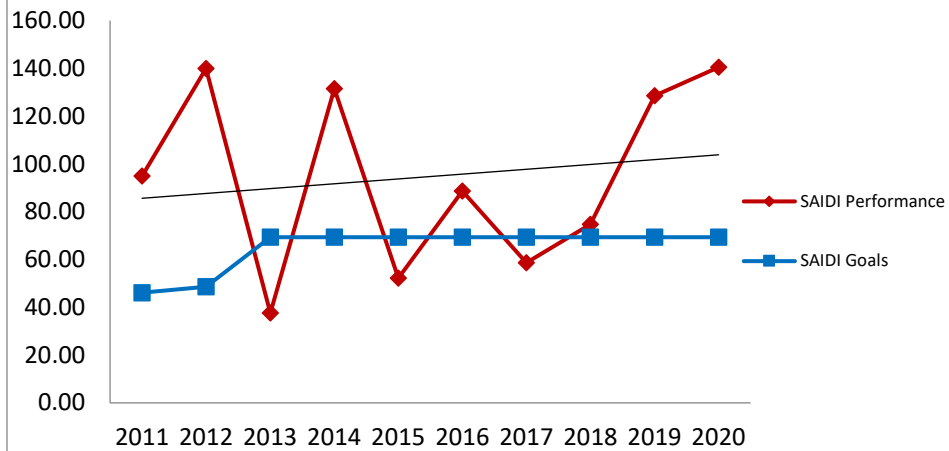


Figure 3: Fergus Falls CSC

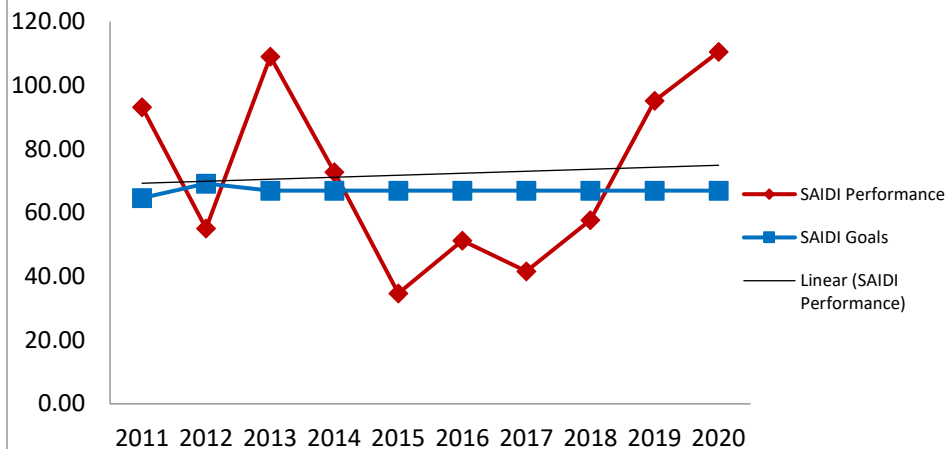


Figure 4: Milbank CSC

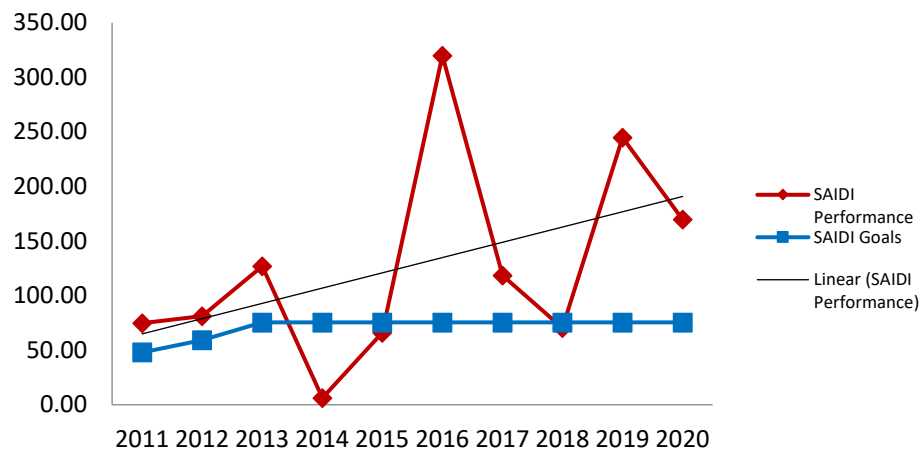
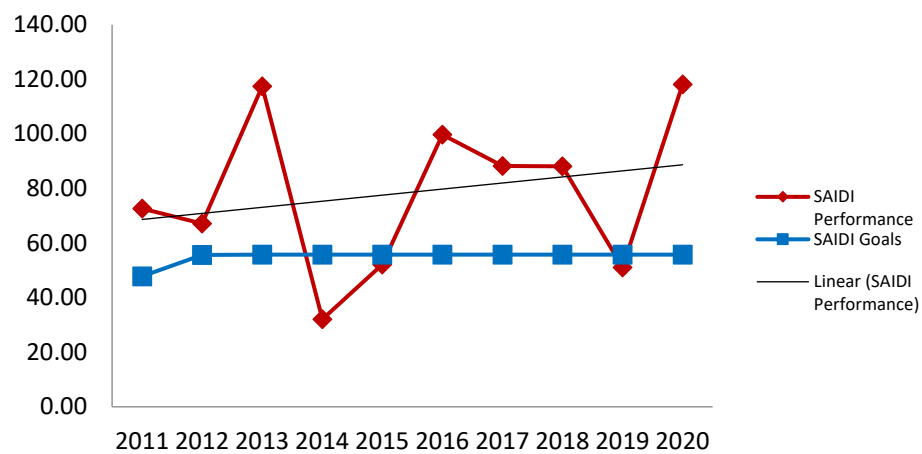
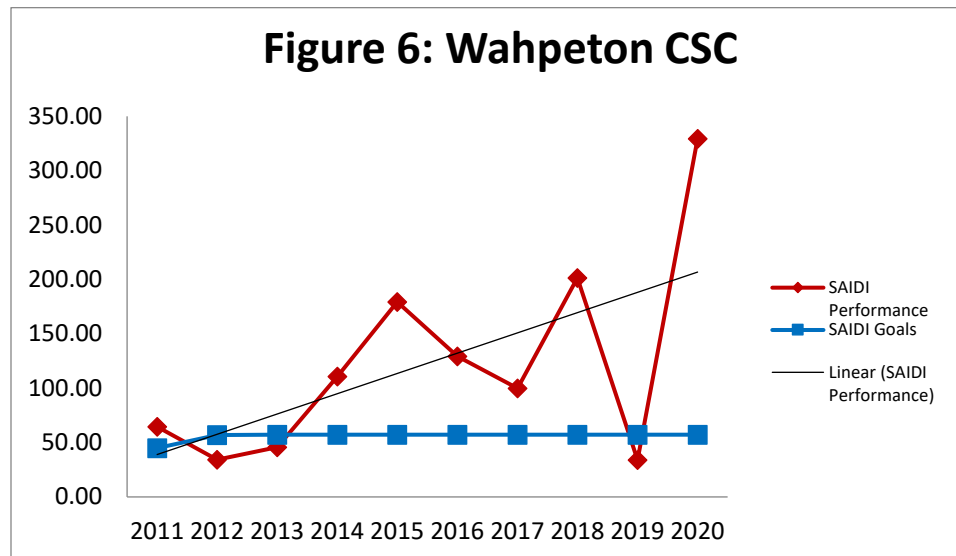


Figure 5: Morris CSC





While Minnesota Rules, part 7826.0600 requires reliability performance standards to be set by work center and does not require establishing an overall goal for a utility's entire Minnesota service territory, OTP has provided overall metrics in its annual reports. As an additional check on OTP's reliability performance trend, the Department examined the extent to which the Company met its overall goals for its Minnesota service area in the past seven years. This information is shown in Table 9.

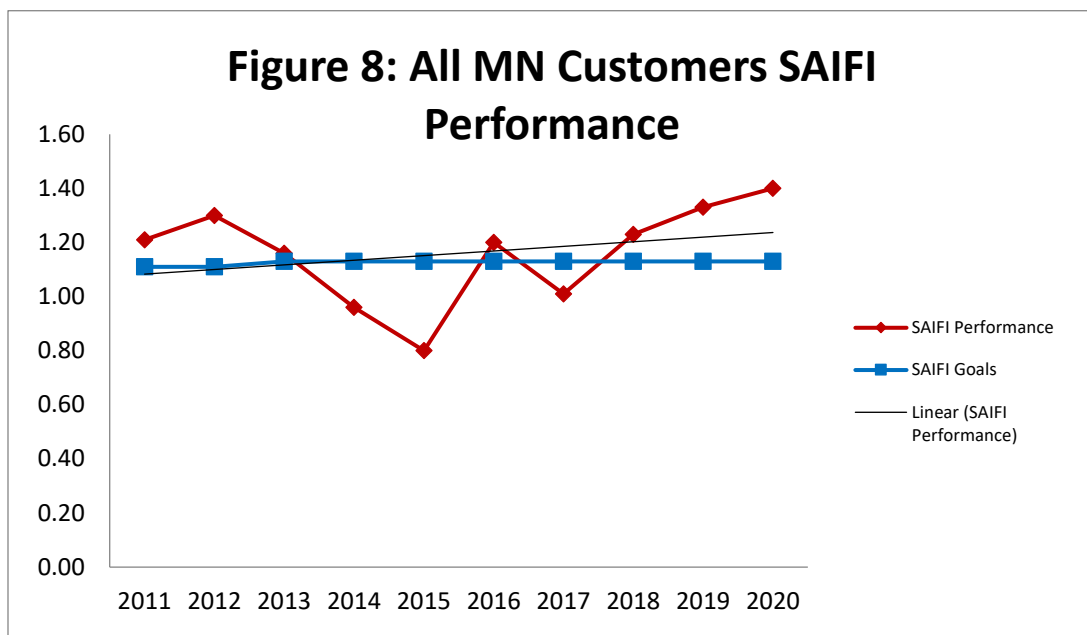
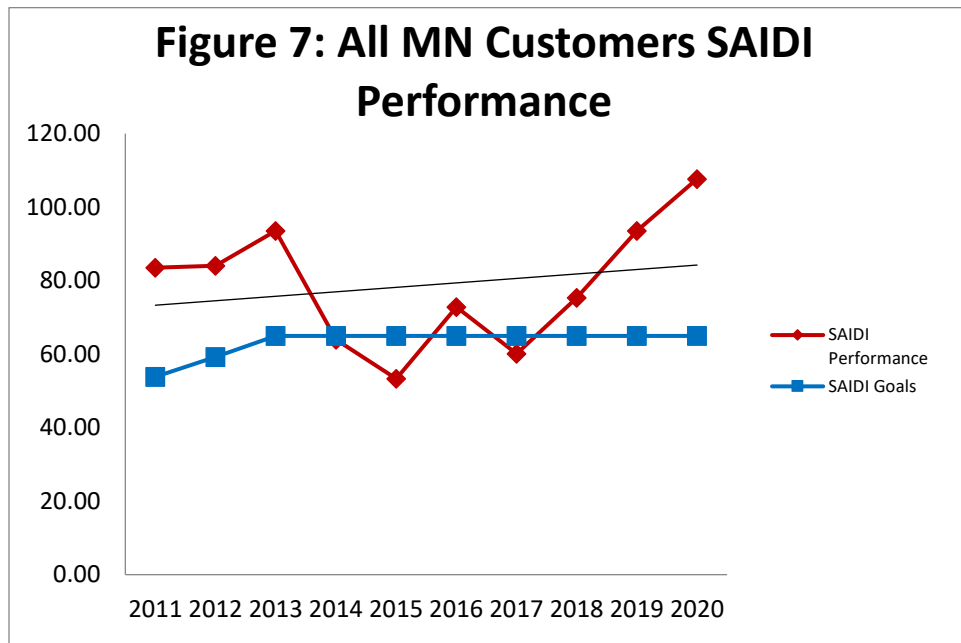
Table 9: OTP's MN Service Area Goals vs Performance¹⁰

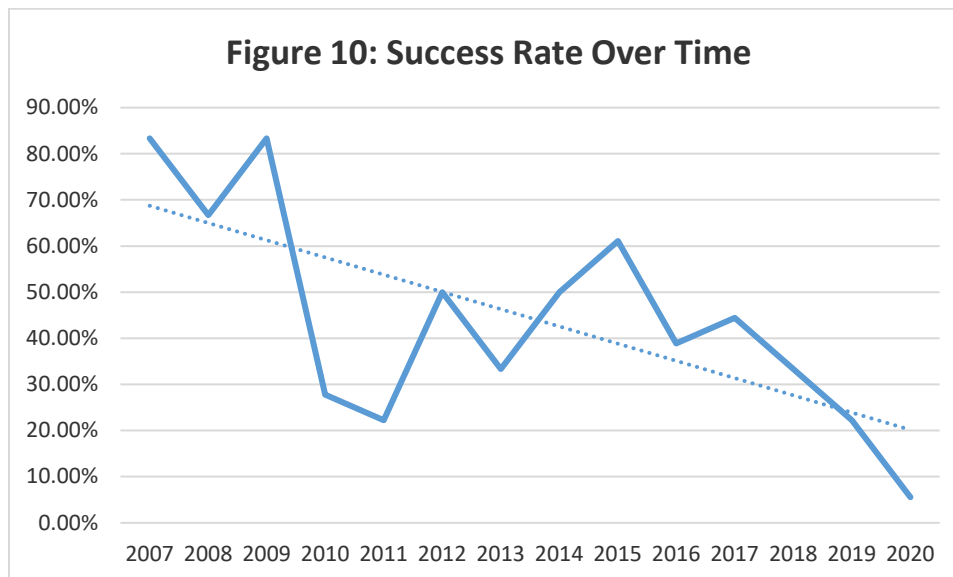
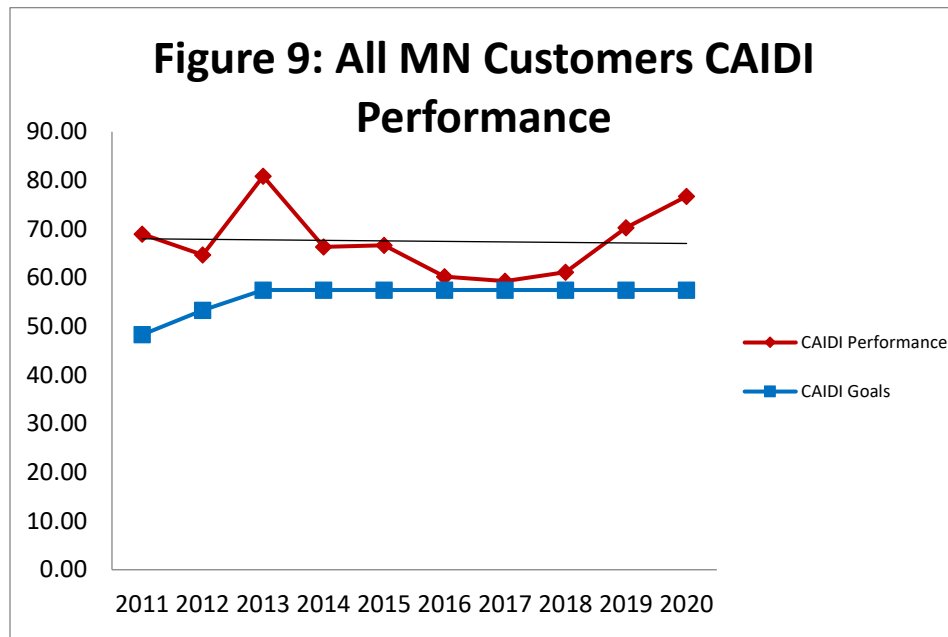
| | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 | 2020 |
|--------------|-------|-------|-------|-------|-------|-------|-------|-------|--------|
| Goal SAIDI | 59.21 | 64.95 | 64.95 | 64.95 | 64.95 | 64.95 | 64.95 | 64.95 | 64.95 |
| Goal SAIFI | 1.11 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 | 1.13 |
| Goal CAIDI | 53.34 | 57.48 | 57.48 | 57.48 | 57.48 | 57.48 | 57.48 | 57.48 | 57.48 |
| Actual SAIDI | 84.05 | 93.51 | 63.93 | 53.30 | 72.80 | 60.06 | 75.33 | 93.51 | 107.66 |
| Actual SAIFI | 1.30 | 1.16 | 0.96 | 0.80 | 1.20 | 1.01 | 1.23 | 1.33 | 1.40 |
| Actual CAIDI | 64.67 | 80.86 | 66.37 | 66.70 | 60.20 | 59.31 | 61.12 | 70.28 | 76.72 |

As can be seen in Table 9, OTP has seen some success in achieving its SAIDI and SAIFI goals at the statewide level. However, since 2018 the Company failed to achieve all three of its SAIDI, SAIFI, and CAIDI goals.

The Company's retrogression in its SAIDI and SAIFI performance in 2016, 2018, 2019, and 2020 have reversed the overall trend of the past nine years that had been moving in an improving direction, as shown in Figures 7, 8, and 9 below. Generally, OTP's performance is relatively flat over the last 9 years.

¹⁰ Goals highlighted in grey indicate that OTP did not meet its performance goal.





Due to OTP's declining performance trend over the last several years in most of its work centers, the Commission has frozen the Company's goals at its 2013 levels to avoid setting goals that would have been progressively easier to achieve if based on a 5-year average of OTP's performance levels. The Commission's January 13, 2014 Order in Docket No. E017/M-13-253 states:

Since improving reliability performance – not just maintaining it – is one of the goals of the standard-setting process, the Commission will continue to require reports on the Company's reliability initiatives in its next annual filing, as well as reports on the causes of outages on major event days.

As can be seen from Figure 10 above, OTP has trended downward over time regarding its ability to meet its goals. On average, since 2006, OTP has achieved approximately 47 percent of its goals, with 2020 coming in lower than that at approximately 5.56 percent.

In the Company's 2019 filing OTP supported its proposal to eliminate CSC-specific reliability standards by stating that some of its CSCs have been reorganized, and that CSC boundaries are likely to continue to change. Further, outages in one CSC may be responded to by other CSCs. The Department is not necessarily opposed to the consolidation, however, this would make comparisons to historical data harder. The Department requests that OTP provide in reply comments a discussion on whether the Company could provide calculations of its SAIDI, SAIFI, and CAIDI values for the last 10 years for its newly proposed CSCs.

E. ANNUAL SERVICE QUALITY REPORT

Minnesota Rules, part 7826.1300 requires each utility to file the following information:

1. Meter Reading Performance (7826.1400),
2. Involuntary Disconnection (7826.1500),
3. Service Extension Response Time (7826.1600),
4. Call Center Response Time (7826.1700),
5. Emergency Medical Accounts (7826.1800),
6. Customer Deposits (7826.1900), and
7. Customer Complaints (7826.2000).

1. Meter Reading Performance

The following information is required for reporting on meter reading performance by customer class:

- A. the number and percentage of customer meters read by utility personnel;
- B. the number and percentage of customer meters self-read by customers;
- 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; and
- D. data on monthly meter reading staffing levels by work center or geographical area.

OTP provided detailed meter reading information, including information on its monthly meter reading staffing levels. Table 10 summarizes OTP's meter reading statistics.

Table 10: OTP Meter-Reading Performance

| | Percent Read by OTP | Percent Read by Customer | Percent Not Read |
|------|--------------------------------|-------------------------------------|-------------------------|
| 2006 | 92.9% | 2.5% | 4.6% |
| 2007 | 93.4% | 2.8% | 3.9% |
| 2008 | 93.8% | 2.7% | 3.5% |
| 2009 | 94.1% | 2.4% | 3.5% |
| 2010 | 94.4% | 2.6% | 3.0% |
| 2011 | 95.1% | 2.6% | 2.3% |
| 2012 | 95.9% | 2.1% | 2.0% |
| 2013 | 95.8% | 1.9% | 2.3% |
| 2014 | 95.9% | 1.8% | 2.4% |
| 2015 | 95.9% | 1.7% | 2.4% |
| 2016 | 96.4% | 1.5% | 2.2% |
| 2017 | 96.4% | 1.5% | 2.2% |
| 2018 | 97.3% | 1.5% | 1.2% |
| 2019 | 97.5% | 1.3% | 1.2% |
| 2020 | 97.1% | 1.3% | 1.6% |

The Department notes that OTP has improved its meter-reading performance over the years measured.

Minnesota Rules, part 7826.0900, subp. 1 requires that at least 90 percent of all meters during the months of April through November and at least 80 percent of all meters during the months of December through March are read monthly. The Company's information reflects that it read at least 97 percent of all meters each month during 2020. According to OTP, there were 52 meters that were not read for a period of 6-12 months in 2020. The Company indicated that this large increase in unread meters was due to the COVID-19 pandemic and safety rules that did not allow employees to enter living quarters or other areas of concern, including one customer, in the healthcare industry, with 30 meters inside its facility which the Company did not allow employees to enter to read. The Department recognizes the difficulties presented by COVID-19 and has no concerns regarding the increase in number of meters that were not read for a period of 6-12 months. Additionally, there were no meters that were not read for a period of greater than 12 months.

The Company reported that it maintained an average of approximately 72 customer service representatives in 2020. OTP also uses third parties to read meters in select cities within the Company's service territory.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1400.

2. Involuntary Disconnections

The following information is required for reporting on involuntary disconnection of service by customer class and calendar month:

- A. the number of customers who received disconnection notices,
- B. the number of customers who sought cold weather rule protection under Chapter 7820 and the number who were granted cold weather rule protection,
- C. the total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours, and
- D. the number of disconnected customers restored to service by entering into a payment plan.

The following table summarizes residential customer disconnection statistics reported by OTP in its annual reports.

Table 11: Residential Customer Involuntary Disconnection Information

| | Received Disconnect Notice | Sought CWR Protection | Granted CWR Protection | % Granted | Disconnected Involuntarily | Restored within 24 Hours | Restored by Entering Payment Plan |
|------|----------------------------------|-----------------------------|------------------------------|--------------|-------------------------------|--------------------------------|---|
| 2005 | 33,274 | 302 | 260 | 86% | 1,008 | 351 | 22 |
| 2006 | 37,980 | 388 | 291 | 75% | 873 | 295 | 54 |
| 2007 | 39,022 | 671 | 573 | 85% | 1,293 | 416 | 61 |
| 2008 | 41,764 | 1,062 | 970 | 91% | 973 | 289 | 28 |
| 2009 | 36,976 | 1,139 | 1,139 | 100% | 1,069 | 432 | 40 |
| 2010 | 38,119 | 1,837 | 1,837 | 100% | 1,122 | 428 | 44 |
| 2011 | 38,723 | 2,118 | 2,118 | 100% | 1,168 | 506 | 38 |
| 2012 | 39,912 | 2,139 | 2,137 | 99.9% | 745 | 558 | 29 |
| 2013 | 39,913 | 1,788 | 1,776 | 99.3% | 745 | 644 | 23 |
| 2014 | 44,894 | 1,430 | 1,424 | 99.6% | 794 | 619 | 104 |
| 2015 | 49,185 | 1,130 | 1,125 | 99.6% | 629 | 232 | 69 |
| 2016 | 49,368 | 932 | 928 | 99.6% | 924 | 301 | 42 |
| 2017 | 48,421 | 817 | 814 | 99.6% | 1,044 | 415 | 33 |
| 2018 | 67,015 | 659 | 658 | 99.9% | 1,088 | 428 | 32 |
| 2019 | 56,257 | 441 | 398 | 90.3% | 317 | 146 | 27 |
| 2020 | 15,677 | 121 | 82 | 68% | 59 | 16 | 17 |

OTP reported that 15,677 disconnection notices were sent to residential, small commercial and large commercial customers in 2020, 14,082 being for residential customers. This number dropped significantly due to the COVID-19 pandemic as the sending of disconnect notices was suspended on April 2, 2020. The COVID-19 pandemic will likely continue to affect the amount of disconnect notices in 2021.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1500.

3. Service Extension Requests

The following information is required for reporting on service extension request response times by customer class and calendar month:

- A. the number of customers requesting service to a location not previously served by the utility 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; and
- 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.

OTP reported the number of service extension requests received each month by customer class. In 2020, 536 customers requested service to a location not previously served. As for locations previously served, OTP reported that 1,344 of these requests were made in 2020. The Department looks for any significant trends in overall service request response times. The Department notes that OTP reported a significant increase in the number of extension requests made in 2019 compared to previous years, however, the number of extension requests dropped back near their historical numbers for 2020. Additionally, response times for 2020 appear to be relatively consistent with past years.

The Department acknowledges that OTP has fulfilled the requirements of Minnesota Rules, part 7826.1600.

4. Call Center Response Time

The annual service quality report must include a detailed report on monthly call center response times, including calls to the business office and calls regarding service interruptions. Further, Minnesota Rules, part 7826.1200 requires that 80 percent of calls be answered within 20 seconds.

OTP provided monthly data regarding the number of incoming calls and those calls that were answered and abandoned. The Company's data indicate that an annual average of 94.04 percent of calls were answered within 20 seconds in 2020. Therefore, the Department concludes that OTP is in compliance with Minnesota Rules, part 7826.1200.

5. Emergency Medical Accounts

The reporting on emergency medical accounts must include the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098, subd. 5, the number of applications granted, the number of applications denied, and the reasons for each denial.

OTP reported that 6 Minnesota customers requested emergency medical account status in 2020, all of whom were granted that status.

The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1800.

6. Customer Deposits

The reporting on customer deposits must include the number of customers who were required to make a deposit as a condition of receiving service.

Table 12 summarizes the number of customer deposits required over the past fifteen years. The number of customers served by OTP is provided for context.¹¹

¹¹ Source: Otter Tail's "Minnesota Electric Utility Annual Report" filed pursuant to Minnesota Rules Chapter 7610. Annual reports are filed by Minnesota utilities on July 1 of each year.

Table 12: Customer Deposits Required

| | Number of Deposits Required | Total Customers Served |
|------|--|---------------------------------------|
| 2005 | 417 | 58,516 |
| 2006 | 395 | 58,841 |
| 2007 | 509 | 59,171 |
| 2008 | 700 | 59,364 |
| 2009 | 869 | 59,421 |
| 2010 | 635 | 59,425 |
| 2011 | 807 | 59,486 |
| 2012 | 847 | 59,615 |
| 2013 | 895 | 59,849 |
| 2014 | 783 | 61,169 |
| 2015 | 597 | 60,232 |
| 2016 | 715 | 61,226 |
| 2017 | 698 | 61,568 |
| 2018 | 685 | 61,888 |
| 2019 | 652 | 62,105 ¹² |
| 2020 | 297 | 61748 |

The Company noted that the decrease in the number of deposits has a direct correlation with the suspension of collections activities due to the COVID-19 Pandemic. The Department acknowledges OTP's fulfillment of the requirements of Minnesota Rules, part 7826.1900.

7. Customer Complaints

The reporting on customer complaints must include the following information by customer class and calendar month:

- A. the number of complaints received;
- 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 customer complaints;

¹² The total customers served for 2019 was taken from the Minnesota Jurisdictional 2018 Report in Docket No. 20-4 rather than the Minnesota Rules Chapter 7610 reports as the data were not yet available at the time for filing.

- C. the number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days;
- 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; and
- E. the number of complaints forwarded to the utility by the Commission's Consumer Affairs Office for further investigation and action.

OTP's report on customer complaints includes the required information. Table 13 contains a limited summary of OTP's customer complaint history.

Table 13: OTP Customer Complaint Selected Summary

| | Number of Complaints | High Bills | Billing Error | Service Restoration | Resolved Upon Initial Inquiry | Took Action Customer Requested |
|------|-----------------------------|-------------------|----------------------|----------------------------|--------------------------------------|---------------------------------------|
| 2006 | 175 | 39% | 7% | 2% | 54% | 49% |
| 2007 | 220 | 27% | 29% | 5% | 66% | 46% |
| 2008 | 325 | 52% | 18% | 2% | 60% | 34% |
| 2009 | 185 | 29% | 14% | 5% | 78% | 36% |
| 2010 | 91 | 26% | 11% | 11% | 78% | 25% |
| 2011 | 110 | 19% | 9% | 10% | 73% | 30% |
| 2012 | 61 | 7% | 11% | 7% | 72% | 32% |
| 2013 | 133 | 9% | 17% | 5% | 92% | 21% |
| 2014 | 98 | 12% | 11% | 4% | 83% | 31% |
| 2015 | 86 | 22% | 22% | 0% | 77% | 23% |
| 2016 | 28 | 0% | 14% | 0% | 93% | 54% |
| 2017 | 33 | 6% | 16% | 0% | 91% | 24% |
| 2018 | 34 | 6% | 0% | 0% | 47% | 21% |
| 2019 | 28 | 18% | 0% | 0% | 54% | 82% |
| 2020 | 30 | 30% | 0% | 0% | 80% | 47% |

The Department notes that 19 of the 30 complaints from 2020 were listed in the “other” category, which is approximately 63 percent of the total number of complaints. The Company stated that this category includes such complaints as “rebate timing, planned outages and third-party meter readers.”¹³

The Department acknowledges OTP’s fulfillment of the requirements of Minnesota Rules, part 7826.2000.¹⁴

F. COMPLIANCE WITH JANUARY 28, 2020 ORDER

The Commissions January 28, 2020 Order in Docket No. E017/M-19-260 included Attachment B, which updated the annual reporting requirements for the Utility. Attachment B required the following to be reported by OTP:

- a. Non-normalized SAIDI, SAIFI, and CAIDI values;
- b. SAIDI, SAIFI, and CAIDI values calculated using the IEEE 2.5 beta method;
- c. MAIFI, normalized and non-normalized;
- d. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6;
- e. The highest number of interruptions experienced by any one customer;
- f. CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours;
- g. The longest experienced interruption by any one customer (or feeder);
- h. A breakdown of field versus office staff required;
- i. Estimated restoration times;
- j. IEEE benchmarking;
- k. Performance by customer class; and
- l. More discussion of leading causes of outages and mitigation strategies.

The Department summarizes OTP’s compliance with each reporting requirement in turn.

¹³ Annual Report, p. 58

¹⁴ The Department’s comments in Xcel’s service quality report (Docket No. E002/M-21-237) request that Xcel discuss the possibility of developing a complaint category for DER customers. The Department does not make the same recommendation for OTP, due to DER issues specific to Xcel at this time.

a. Non-normalized SAIDI, SAIFI, and CAIDI values

OTP provided this information in Tables 4 and 4a on page 11 of its Report. The following tables show the normalized and non-normalized values for SAIDI, SAIFI, and CAIDI as reported by OTP. As there were no major event days during 2020 these numbers are identical.

Table 14: Normalized and Non-normalized SAIDI, SAIFI, and CAIDI

| Work Center | SAIDI | SAIFI | CAIDI |
|---------------------|--------------|--------------|--------------|
| Bemidji | | | |
| Non-normalized | 55.48 | 1.27 | 49.22 |
| Normalized | 55.48 | 1.27 | 49.22 |
| Crookston | | | |
| Non-normalized | 140.47 | 1.50 | 93.63 |
| Normalized | 140.47 | 1.50 | 93.63 |
| Fergus Falls | | | |
| Non-normalized | 110.48 | 1.42 | 77.57 |
| Normalized | 110.48 | 1.42 | 77.57 |
| Milbank | | | |
| Non-normalized | 169.89 | 2.00 | 84.94 |
| Normalized | 169.89 | 2.00 | 84.94 |
| Morris | | | |
| Non-normalized | 118.19 | 1.39 | 84.71 |
| Normalized | 118.19 | 1.39 | 84.71 |
| Wahpeton | | | |
| Non-normalized | 329.5 | 4.33 | 76.04 |
| Normalized | 329.5 | 4.33 | 76.04 |

b. SAIDI, SAIFI, and CAIDI values calculated using the IEEE 2.5 beta method

See Table 14 above.

c. MAIFI – normalized and non-normalized

OTP provided this information on page 4 of its Annual Report. Table 15 below shows the Company's normalized and non-normalized MAIFI for 2019. As there were no major events in 2020, these numbers are identical.

Table 15: 2020 Normalized and Non-Normalized MAIFI

| CSC 2019 | MAIFI |
|-----------------|--------------|
| Bemidji | 4.99 |
| Crookston | 7.3 |
| Fergus Falls | 7.65 |
| Milbank | 8.48 |
| Morris | 5.76 |
| Wahpeton | 2.35 |
| MN Total | 6.64 |

d. CEMI – at normalized and non-normalized outage levels of 4, 5, and 6

OTP provided this information in page 33 of its Annual Report. Regarding CEMI, the Department notes that the Company has seen an improvement in recent years as the percentage of customers experiencing five or greater outages, and customer experiencing seven or greater outages has decreased from highs in 2015 and 2016 to lows in 2020. Table 16 below shows the Company's CEMI performance for 2020 at various intervals.

Table 16: 2020 CEMI

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

e. Highest number of interruptions by any one customer

OTP provided this information on page 34 of its Annual Report. OTP stated that the North Feeder fed from the Ottertail City Substation experienced the most interruptions and was the Fergus Falls CSC's worst performing circuit with 1 sustained and 27 momentary interruptions.

f. CELI – at intervals of greater than 6 hours, 12 hours, and 24 hours

OTP provided this information on page 34 of its Annual Report. Table 17 below shows the Company's CELI performance for 2020 at the various intervals.

Table 17: 2019 CELI at 6, 12, and 24 Hours

| | |
|------------|-------|
| CELID – 6 | 1.61% |
| CELID – 12 | 0.19% |
| CELID – 24 | 0.00% |

g. The longest experienced interruption by any one customer

OTP provided this information on page 34 of its Annual Report. OTP stated that the Main Feeder fed from the Hermene substation experienced the longest duration interruption at 8 hours and 26 minutes and was a planned outage to upgrade the substation.

h. A breakdown of field vs office staff required

OTP provided this information on page 27 of its Annual Report. The Department previously discussed this information above and provided the information in Table 6 of these comments.

i. Estimated restoration times

OTP stated that, "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."¹⁵

j. IEEE benchmarking

OTP provided a table on page 35 of its Annual Report showing a comparison of OTP's 2020 performance with the 2019 IEEE medial normalized performance for all and medium sized respondents. The Department notes that the 2019 second quartile range is very similar to the 2018 range, and suggests that on average there might not be a wide change in utility performance from year to year for IEEE participants.

k. Performance by customer class

Regarding performance by customer class, OTP stated that it currently does not possess the capability of monitoring reliability by customer class and only has the ability to measure reliability at feeder level. OTP stated that it has feeders with more than one class of customer on them.

l. More discussion of leading causes of outages and mitigation strategies

OTP provided this information in its discussion of the reliability reporting requirements on pages 12-15 of the Annual Report and in Table 5 of the filing.

¹⁵ Annual Report, p. 34.

III. RECOMMENDATIONS

The Department recommends that the Commission accept OTP's Annual Report.

The Department supports including the IEEE benchmarking analysis in the annual reports and is open to using the IEEE benchmarking analysis to set utilities rates if the data is available for Department analysis. The Department believes it is important for the that the data used to calculate the IEEE benchmarks be available for analysis if any issues with utility performance arise.

The Department also recommends that the Commission continue to require the Companies to provide data on a work center level.

The Department requests that OTP provide in reply comments a discussion on whether the Company could provide calculations of its SAIDI, SAIFI, and CAIDI values for the last 10 years for its newly proposed CSCs.

The Department will make final recommendations on the Company's proposal to consolidate work centers after reviewing reply comments.

The Department will provide recommendations on the Company's goals after reviewing the Company's future supplemental filing on IEEE benchmarking data.

Finally, the Department requests that the utilities provide, at a minimum, the following:

- The percentage uptime, to the second decimal, of the utility's:
 - general website
 - payment services
 - outage map and/or outage information page
- the error rate percentage, to the third decimal, of the utility's payment services.
 - If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer's control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

Additionally, the Department requests the utility discuss in Reply Comments whether it:

- has a chat feature on its website, and whether that chat feature is:
 - live and staffed by internal utility employees;
 - live and staffed by third-party vendor employees;
 - a chat bot; or
 - something else and/or a combination of the above options.
- uses internal or third-party monitoring of website functionality including, but not limited to, metric analysis and on-call services for critical website failures.

CERTIFICATE OF SERVICE

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

Minnesota Department of Commerce
Comments

Docket No. E017/M-21-225

Dated this **16th** day of **August 2021**

/s/Sharon Ferguson

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|-----------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | 12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |
| Brooke | Cooper | bcooper@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022191 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| James C. | Erickson | jericksonkbc@gmail.com | Kelly Bay Consulting | 17 Quechee St Superior, WI 54880-4421 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Jessica | Fyhrie | jfyhrie@otpc.com | Otter Tail Power Company | PO Box 496 Fergus Falls, MN 56538-0496 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |
| Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Shane | Henriksen | shane.henriksen@enbridge.com | Enbridge Energy Company, Inc. | 1409 Hammond Ave FL 2 Superior, WI 54880 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|------------------------|
| Andrew | Moratzka | andrew.moratzka@stoel.com | Steel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Matthew | Olsen | molsen@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Wendi | Olson | wolson@otpc.com | Otter Tail Power Company | 215 South Cascade Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |
| Larry L. | Schedin | Larry@LLSResources.com | LLS Resources, LLC | 332 Minnesota St, Ste W1390 St. Paul, MN 55101 | Electronic Service | No | OFF_SL_21-225_M-21-225 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |
| Cary | Stephenson | cStephenson@otpc.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | Yes | OFF_SL_21-225_M-21-225 |