

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

August 26, 2021



Mr. Will 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-21-225
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail and Company) respectfully submits to the Minnesota Public Utilities Commission (Commission) these Reply Comments in response to the Comments received from the Department of Commerce, Division of Energy Resources (Department) dated August 16, 2021, in the above referenced docket.

1. Otter Tail's discussion on providing calculations of SAIDI, SAIFI, and CAIDI values for the last 10 years for newly proposed 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.

It is not technically feasible for Otter Tail to calculate our proposed consolidated region's SAIDI, SAIFI, and CAIDI values for the last 10 years for the following reasons.

1. The new interruption monitoring system was commissioned in 2019. Thus, our current system only has Minnesota data starting in 2019. Our prior system, Sensus, was discontinued on December 31, 2018. The current system does not have the data available in a format that can be presented in an accurate comparison.

2. 2019 and 2020 proposed consolidated history calculations cannot be calculated as our current interruption monitoring system (Itron) locks the “regions” we have created annually in their historical data base at the end of each year. We are able to create regions going forward for the current calendar year of tracking and calculations, but we are not able to look backwards prior to the calendar year the change is made.

As stated in previous filings, Otter Tail’s new interruption monitoring system monitors three phases, opposed to our single-phase capabilities of our previous system. Thus, the new system is recording more customer minutes and interruptions when compared to the old system. Historic comparisons are not equivalent based on the method of collecting data in the new system.

Also, Wahpeton CSC’s MN customers consolidated into the Fergus Falls CSC make up one percent of the new customer total in the consolidated Fergus Falls CSC region. Milbank CSC’s MN customers consolidated into the Morris CSC make up seven percent of the new customer total in the consolidated Morris CSC regions. If we had the capability to calculate historic indices and provide valid data comparisons, the impact to historic calculations comparisons would be negligible due to the fact that the customer count changes are insignificant.

2. Otter Tail’s discussion relating to web-based service metrics.

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.*

We do have programs in place to monitor the reliability of our website for our customers. Otter Tail can provide uptimes of our website and outage map information. To the extent feasible, we will provide uptime information regarding our payment services. We are working with our third-party payment provider as to the information they are providing regarding uptime and errors that occur.

Otter Tail requests that this reporting begin with our 2022 report filed April 1, 2023. This will provide time to obtain information from our third-party payment service and to conduct a report build with both internal and external sources.

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.*

Otter Tail currently does not have a chat feature. Through our customer experience initiative, we are reviewing the possibility of implementing chat as a part of an overall customer engagement platform. Providing staffing for a chat feature will be a critical component of the discussion as to our overall direction.

Otter Tail is committed to providing a reliable website and service to our customers. We utilize a third party to monitor our website for errors that may arise. The monitoring system allows for notifications to be sent when errors happen to lower the down time of that specific component to the website.

Conclusion

Otter Tail appreciates the opportunity to submit these Reply Comments and the Department's thorough review of this Docket.

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 wolson@otpc.com.

Sincerely,

/s/ WENDI OLSON

Wendi Olson

Regulatory Compliance Specialist

tlk

Enclosures

By electronic filing

c: Service List

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-21-225

I, Tammy Kubela, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

Otter Tail Power Company
Reply Comments

Dated: August 26, 2021

/s/ TAMMY KUBELA

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

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