

October 5, 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:

On August 26, 2021 Otter Tail Power Company (OTP or the Company) filed Reply Comments (Reply Comments) with the Minnesota Public Utilities Commission (Commission) responding to requests from the August 16, 2021 comments by the Minnesota Department of Commerce (Department) on the Company's Annual Safety, Reliability, and Service Quality Report and Proposed SAIFI, SAIDI, and CAIDI Reliability Standards for 2021. Additionally, on August 20, 2021, the Company submitted the IEEE Supplemental filing (Supplemental Filing) which included the 2020 IEEE benchmark median for medium sized utilities, which OTP proposes to use as its 2021 Reliability goals.

In its Supplemental filing the Company provided results comparing the 2020 IEEE benchmark for medium sized utilities to its actual systemwide results, presented in Table 1 below.

**Table 1: 2020 IEEE Benchmarks vs OTP 2020 MN Performance**

	SAIDI	SAIFI	CAIDI
<b>2020 IEEE Benchmark Median for Medium Sized Utility</b>	128	0.98	123
<b>OTP MN System Wide Actual Results</b>	107.66	1.4	76.72

As discussed in the Department's August 16, 2021 comments, 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. In response to Department information request 1 OTP provided an IEEE slideshow presenting the results of the IEEE Benchmark Year 2021. The Department's original concern regarding IEEE benchmarking results is whether the underlying data is available for analysis. The slideshow provided did not contain the underlying data, but rather a summary, also noting that the participation list is not revealed to anyone, so analysis of the underlying data may not be possible. The Department maintains its concerns with the IEEE benchmarking results not being available for analysis. Therefore, the Department requests clarification from the Commission about whether the IEEE benchmarking data is acceptable for setting goals given the lack of transparency of the data.

In the Company's Reply Comments OTP responded to two requests by the Department. First OTP stated that the Company is not able to provide calculations of its historical SAIDI, SAIFI, and CAIDI values for its newly proposed customer service centers (CSCs), and that going forward the new data will not be directly comparable anyway, as the new interruption monitoring system monitors three phases, as opposed to the single-phase only capabilities of the previous system. The Company did note, however, that for the newly proposed CSCs the Wahpeton CSC when consolidated into the Fergus Falls CSC would only make up one percent of the new customer total, and the Milbank CSC when consolidated into the Morris CSC would make up only seven percent of the new customer total. The Department concludes that because the going forward data for SAIDI, SAIFI, and CAIDI would not be directly comparable to the old data, and because the consolidated CSCs are very small, that the proposed consolidation to four CSCs, as proposed by OTP, is reasonable.

Secondly OTP provided a discussion relating to web-based service metrics. The Company stated that it does have programs in place to monitor the reliability of OTP's website and outage map information, and the Company is working with its third-party payment provider regarding uptime and errors that occur. OTP stated that it does not currently have a chat function on its website, although the Company is considering such a function for the future. OTP also requested that the Department's requested reporting requirements on web-based services begin with the 2022 report to be filed on April 1, 2023 so as to provide time to obtain information from its third-party payment service. As it is already late into 2021, the Department concludes that this request is reasonable and requests that OTP begin providing the reporting requirements as requested in the Department's August 16, 2021 comments.

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In conclusion the Department recommends that the Commission approve OTP's CSC consolidation, agrees with the Company's request to begin reporting website use metrics beginning with the 2022 report, and requests clarification from the Commission about whether the IEEE benchmarking data is acceptable for setting goals given the lack of transparency of the data.

Sincerely,

/s/ MICHAEL N. ZAJICEK  
Rates Analyst

MNZ/ja

## **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  
Letter**

**Docket No. E017/M-21-225**

**Dated this 5<sup>th</sup> day of October 2021**

**/s/Sharon Ferguson**

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