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October 15, 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
Response to Minnesota Department of Commerce Letter**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) respectfully submits to the Minnesota Public Utilities Commission (Commission) this Response to the Minnesota Department of Commerce (Department) Comments dated October 5, 2021, in the above referenced docket.

On August 20, 2021, Otter Tail submitted a Supplemental Filing in this docket including a comparison of Otter Tail's 2020 reliability metrics to the 2020 IEEE Benchmark Median for Medium Sized Utilities in accordance with the Commission's prior order.¹ In its October 5 comments, the Department expressed concerns with establishing reliability goals based on IEEE benchmark data where the underlying data is not available for analysis. As the Department noted, in response to the Department's data request Otter Tail provided the results of the IEEE 2020 Benchmark Reliability Survey, which are presented as a slideshow summarizing the IEEE study results for 2020 data. The Company does not have access to additional data on which the Department could conduct further analysis. However, the IEEE 2020 Benchmark Reliability Survey includes reference to the standards used to define the data collected and excluded (IEEE 1366-2003/2012) and notes the limitations of comparison. The Company maintains support for the IEEE benchmark as a useful comparison to establish reliability metrics since it allows comparison to utility performance across the Midwest region to similarly sized utilities.

¹ Ordering paragraph 9 of the Minnesota Public Utilities Commission's Order Accepting Reports, Requiring Additional Filings, and Establishing Workshop dated December 18, 2020, in Docket No. E017/M-20-401 (In the matter of Otter Tail Power Company's 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2020).

Otter Tail appreciates the Department's consideration and recommendation for approval of Otter Tail's consolidated customer service center reporting and future reporting on website use metrics.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8657 or molsen@otpc.com.

Sincerely,

/s/ MATTHEW J. OLSEN

Matthew J. Olsen
Manager, Regulatory Proceedings and Compliance

tlk
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
Response to Minnesota Department of Commerce Letter

Dated: October 15, 2021

/s/ TAMMY KUBELA

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

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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
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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
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Kavita	Maini	kmainsi@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

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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
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