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January 18, 2021

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 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2020
Docket No. E017/M-20-401
Compliance Filing

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits this Compliance Filing in response to the Minnesota Public Utilities Commission's (Commission) December 18, 2020 Order in the above-captioned matter.

Medical Necessary Equipment

Decision option 15 within the December 18, 2020 order states "Within 30 days, each utility must file a compliance filing in which engagement plans related to Emergency Medical Account status are explained." We appreciate the Commission's efforts to draw visibility to this customer protection.

Otter Tail plans to increase our customer visibility to this protection through various mediums. Otter Tail currently has language in our customer information brochure to highlight the protection. This brochure is sent to new customers and is available on our website. To increase awareness of this protection, we will be creating a separate bill insert that will be sent in September each year in conjunction with our Cold Weather Brochure to our residential and farm customers. The bill insert will also be included in our new customer packet.

We are enhancing our customer protections page on our website to include information regarding medical necessary equipment including qualification criteria and how to apply for the protection. This page will serve as the main location for customer protection education, ways to apply and qualify for programs like medical necessary equipment protection, cold weather rule protection and financial aid such as energy assistance.

In collaboration with Minnesota Power and Xcel Energy, Clean Energy Resource Team and Citizens Utility Board have both agreed to place a link on their low-income energy assistance page to each utility's respective page promoting Energy Assistance and medical necessary protections. We will be providing a link to our customer protections page once completed.

Otter Tail will be sending a specific communication regarding medical necessary equipment protection to community hospitals and clinics within our service territory. The purpose of this communication would be to provide awareness of the protection to hospital or clinic employees such as a social worker who assists patients with specific needs upon leaving their facility. We will mail the letter after the update to our customer protection page has been completed and include a link to the page within the letter.

Our Customer Service Representatives will continue to educate and promote this protection and others with our customers as they are communicating their specific circumstance.

Making the changes and updates listed above, Otter Tail is hopeful that this outreach will serve beneficial and educational to our customers and local health care providers with respect to protections customers may qualify for.

Service Extensions

Decision option 15 in the December 18, 2020 order also states that "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."

1. Locations not previously served.

The 2019 report provided data with an overstated number of days to complete the request for service.

The process for extending service to locations not previously served at the launch of our new Customer Information System was to open an account at the time a customer made their initial inquiry. Opening the account would create a service order for our field personnel. In certain situations, this process was sufficient if the customer was ready to have a meter installed and power turned on at their location when the customer made the initial inquiry. However, if the customer were not ready for a meter to be installed, but rather just inquiring about their project, the service order would remain open until the customer was ready for the meter to be installed and power turned on. That could be weeks or months later depending on the specific customer situation. This process skewed the number of days to complete the request for power to be turned on as our field personnel would use the open service order to complete the request for service.

We have since set up our system to differentiate between an initial inquiry and the date when the customer requests service. We changed the process by creating an inquiry service order on a non-billing holding account rather than create the customer's account. By making this change, and inserting the inquiry service order, the field personal is notified to communicate with the customer regarding the initial steps of the specific project. After the initial customer discussion, the customer will contact us to request service when they are ready to have their meter installed. We then create the account and a meter install service order. For this reporting, we utilize the date of the meter install service order and the date of resolution of the meter install service order for our timeframe.

2. Locations Previously Served but not at the time of the request.

In our 2019 report, we reported that we were not able to delineate the data to specifically identify the accounts for this requirement which significantly increased number of accounts we reported.

The resolution came with more time and exposure with our new customer information system. With the benefit of utilizing our new customer information system for another year, we have been able to learn more about our reporting capabilities. We were able to enhance our reporting to provide the specific data for this requirement moving forward.

We are available to provide additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8443 or email me at ckremeier@otpc.com.

Sincerely,

/s/ *COLLIN KREMEIER*
Collin Kremeier

tlk
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company 2019 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2020
Docket No. E017/M-20-401

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
Compliance Filing

Dated this 18th day of January, 2021

/s/ Tammy Kubela

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

[illegible]

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_20-401_20-401
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_20-401
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_20-401_20-401
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-401_20-401
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-401_20-401
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_20-401
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