OTTER TAIL POWER COMPANY Docket No: EL17-002

Response to: South Dakota Public Utilities Commission

Analyst: SDPUC Staff Date Received: 01/24/2017 Date Due: 02/07/2017

Date of Response: 02/07/2017

Responding Witness: Cary Stephenson, Associate General Counsel

Information Request:

Does OTP intend to release aggregated data for multiple Customers? Please explain. Include what the Company feels is a "level of aggregation sufficient to ensure Customer anonymity".

Attachments: 0

Response:

OTP has not received any request for aggregated South Dakota customer data to date. If and when such a request is made, OTP will evaluate the request on the identity and stated need of the requesting party. OTP will not provide aggregated data to commercial entities such as vendors of services, supplies or equipment. Instead OTP will consider requests from building owners (and their authorized agents) seeking whole-building data on their own buildings, municipalities served by OTP, and other South Dakota political subdivisions/entities, including universities.

OTP anticipates adopting a 15/15 aggregation standard for general application. This standard allows the release of aggregated Meter Data only if the requested data set includes at least 15 customers in a customer class and where no one customer accounts for more than 15 % of the energy consumption of the 15 customers. With respect to whole-building data requested by the building owner or the owner's authorized agent, OTP anticipates adopting a 4/50 standard which allows release of a building's aggregated Meter Data if it houses at least four customers in a customer class and where no one customer accounts for more than 50% of the energy consumption of the four customers. In cases of whole-building data requests, OTP will encourage building owners to secure authorization for release of Meter Data directly from their tenants rather than seeking whole-building aggregated data.

OTP is in the process of developing a company-wide aggregation standard policy.