

OTTER TAIL POWER COMPANY

Docket No: EL21-001

Response to: SD Public Utilities Commission

Analyst: Staff

Date Received: January 15, 2021

Date Due: January 29, 2021

Date of Response: January 29, 2021

Responding Witness: David G. Prazak, Supervisor, Pricing- (218) 739-8595

Data Request:

Refer to Otter Tail's Letter regarding Petition where it states, "Otter Tail plans to file the Small Power Producer rates every two years or annually as warranted".

- a. Given that 18 CFR 292.302 and SDPUC Docket F-3365 established a review period of "at least every two years", why has Otter Tail chosen to make this filing annually?
- b. Does the language in Otter Tail's tariff sections 12.01, 12.02, and 12.03 stating "the schedule for these payments is subject to annual review" and any language in contracts with Otter Tail's customers require Otter Tail file this annually? Explain.
- c. Given the number of small qualifying facilities currently subject to Otter Tail's tariff, does the change in annual revenues associated with this filing support the need to file annually versus biannually? Explain.
- d. Would an increase or decrease in the number of small qualifying facilities in the future change the need for an annual vs. biannual filing? Explain

Attachments:

Response:

- a. Otter Tail makes this filing annually to stay consistent with similar filings in our two other jurisdictions. As a result, Otter Tail provides the most up to date prices to all customers across our system. Otter Tail is open to discussing the merits of filing biannually.
- b. The language in Otter Tail's tariff sections 12.01, 12.02, and 12.03 stating "the schedule for these payments is subject to annual review" means that we review current and proposed new rates annually. As noted above we have traditionally made this filing annually to stay consistent with the rates in other two states. There is no contractual obligation requiring annual filings.

- c. The number of small qualifying facilities currently subject to Otter Tail's tariff, and subsequent payments made to these customers has not been a factor in our decision to file annually versus biannually. As noted above we believe there is merit in being consistent across our jurisdictions.

- d. A change in the quantity of the small qualifying facilities in the future is a factor to consider, but as noted above Otter Tail supports a uniform approach to timing of these filings across its jurisdictions.