

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)



June 28, 2024

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

**Re: In the Matter of Otter Tail Power Company's Petition for Approval of a Bill
Redesign and Modifications to General Rules and Regulations, Rate
Schedule Section 1.05
Docket No. EL23-021
Amendment Filing – Following Suspension**

Dear Ms. Van Gerpen:

Otter Tail Power Company (Otter Tail) provides this amendment filing to the South Dakota Public Utilities Commission (Commission) to update the sample bills that are included in our Section 1.05 Rate Schedule and offer a new launch date for our bill redesign, in the above referenced matter. Otter Tail proposes to launch our new bill design on September 1, 2024 with the Commission's approval, as described below.

Background

- On August 18, 2023, Otter Tail filed a petition for approval of a redesigned format of customer bills and to modify Otter Tail's General Rules and Regulations.
- On October 3, 2023, Otter Tail submitted an amendment filing requesting an amendment to our bills and Disconnect Notice samples.
- On October 6, 2023, Otter Tail submitted a second amendment filing per Commission staff request to include the Commission's address within our Disconnect Notice.
- On October 31, 2023, after discussion with Commission staff, Otter Tail filed a letter clarifying the timeline for approvals in this matter. We requested approval of our bill samples, Disconnect Notice, and exception to our manual bills by December 1, 2023, and updates to our tariff to follow, with a Supplemental filing due by March 1, 2024.

- The Commission issued an Order approving our proposed Electric Service Statements, Disconnect Notice, and Manual Bill Exception on November 8, 2023, and Amended Order dated November 9, 2023, following the Commission Agenda Meeting on November 7, 2023.
- On February 29, 2024, Otter Tail submitted a Supplemental Filing for approval of modifications to our Rate Schedule Section 1.05 in compliance with the Commission's Order dated November 9, 2023.
- The Commission approved this request in their Order dated March 28, 2024, approving Tariff Revisions and updated Customer Information Brochure effective June 1, 2024.
- On April 4, 2024, Otter Tail submitted a compliance filing with final Section 1.05 Rate Schedule pages effective June 1, 2024.
- Late in April of 2024, Otter Tail determined that the launch date of our new bill design needed to be pushed out and a filing requesting suspension was submitted on April 30, 2024.
- On May 10, 2024, the Commission approved this request to suspend the launch date of our bill redesign and tariff updates previously approved on March 28, 2024.

Reason for filing

Since the Commission's approval of our bill redesign, our Customer Information System team, along with our third-party contractor, have been working diligently to develop this bill redesign compatible with our billing system. During the development and testing it was identified that items currently displayed on our sample bills needed revisions to better reflect system capabilities. These improvements clearly describe our charges in a manner that is easier for our customers to understand.

Additionally, we propose to launch our new design on September 1, 2024.

Sample Bill Updates

The sample bill improvements are described below and included in more detail in the redline sample bills shown at Attachment 1. We previously submitted enhancements and necessary changes to our sample documents on October 3, 2023, and October 6, 2023. Those changes are also incorporated into these sample bills.

- 1) To eliminate inaccuracies in customer names and titles in the top right-hand corner of the front page of our bill, it was determined that capitalizing the name and address was necessary.
- 2) Due to the increase in available characters on our new bill design, the rate titles have been updated. The new titles give more detail, are easier for our customers to understand, and match their corresponding Rate Schedules.

- 3) Rates with penalties will include the penalty readings and charges within the corresponding rate, rather than a separate rate box for the penalty.
- 4) Line items on the bill have been updated for clarity and an additional line for “Billing Demand” will be included on a customer’s bill to all meters with kW Reactive Demand. The Billing Demand will sum the Metered Demand and kW Reactive Demand, which will be helpful for our customers when calculating their Demand Charge.
- 5) The margins on the bottom of the backside of our bills needed to be adjusted to accommodate internal codes utilized by our Remittance Center.

Rate Schedules and Customer Information Brochure

Included with this filing at Attachment 2 you will find a clean version of page 1 and pages 11 through 16 of our Section 1.05 Rate Schedule and at Attachment 3 you will find an updated Customer Information Brochure. The sample bills previously included have been updated with the new version as described above.

During our review of our Customer Information Brochure, we identified that it would be beneficial to our customers to enhance the descriptions of our riders in the How to Read your Bill section of the Customer Information Brochure. Reference numbers 18, 19, and 20 have been updated to include descriptions as follows rather than just the rider titles.

18. *The Energy Efficiency Program surcharge represents our investment in energy efficiency programs that help our customers save energy.*
19. *The Transmission Cost Recovery Rider allows our company to recover approved costs that are not included in base rates and that are associated with transmission additions designed to meet our customer's energy needs, accommodate the delivery of additional renewable energy, and enhance transmission system reliability.*
20. *The Phase-in Recovery Rider allows our company to recover costs associated with approved generation and distribution capital projects not included in base rates.*

Conclusion

We appreciate the Commission’s consideration in updating our Section 1.05 Rate Schedule pages, improvements to our sample bills, and updates to our Customer Information Brochure. To meet our communication deadlines, Otter Tail requests approval by August 1, 2024, with an effective date of September 1, 2024.

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We are available to provide additional information or respond to any questions you may have. Feel free to contact me at 218-739-8827 or at jschmit@otpc.com.

Sincerely,

/s/ JOLEEN SCHMIT
Joleen Schmit
Customer Experience Specialist
Customer Care

lcd
Enclosures
By electronic filing
c: Service List