

OTTER TAIL POWER COMPANY

Docket No: EL24-004

Response to: SD Public Utilities Commission

Analyst: Eric Paulson

Date Received: February 28, 2024

Date Due: March 13, 2024

Date of Response: March 13, 2024

Responding Witness: Svetlana Fedje, Pricing Analyst - (218) 739-8799

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Data Request:

Refer to the revised tariff pages, on Section 14.00 Revised Sheet No. 1 Otter Tail has check marks next to the rate classed that this new My RECs may be applicable too. Explain the following:

- a) The Farm Service rate which is applicable is a residential rate but this program in the petition and on Section 14.14 Sheet No. 1 says this is not available to residential customers. Explain why Farm Service is checked as an option.
- b) Small General Service (Under 20 kW) is an option. Why is a rate class specifically under 20 kW checked as an option?
- c) For firm and non-firm Standby customers, are they eligible based on demand at some point in the previous 12 months, by the reservation amount they pay for each month, or some other way?
- d) Irrigation doesn't appear to measure demand. How will Otter Tail determine if an irrigation customer has a demand of 20 kW or greater?
- e) Outdoor Lighting - Energy Only is also only billed based on energy usage. How will Otter Tail determine if an Outdoor Lighting - Energy Only customer has a demand of 20 kW or greater?
- f) Outdoor Lighting (Closed) is only a fixed amount with no metering. How will Otter Tail determine if an Outdoor Lighting (Closed) customer has a demand of 20 kW or greater?
- g) LED Street Lighting and Area Lighting is also only a fixed amount with no metering. How will Otter Tail determine if an LED Street Lighting and Area Lighting customer has a demand of 20 kW or greater.

Attachments: 1

Attachment 1 to DR SD-PUC-01.01.pdf

Response:

Otter Tail reviewed the check marks on Section 14.00 Revised Sheet No. 1 to the rate classes that this new My RECs may be applicable too. The following are our responses to a through g.

- a) The Farm Service rate which is applicable is a residential rate but this program in the petition and on Section 14.14 Sheet No. 1 says this is not available to residential customers. Explain why Farm Service is checked as an option.
  - Farm Service on rate S361 can be either residential or non-residential. This My RECs service is available to the non-residential part of Farm Service that fits other requirements.
- b) Small General Service (Under 20 kW) is an option. Why is a rate class specifically under 20 kW checked as an option?
  - It may apply if a customer has other qualifying base services. For example, if the customer has a qualifying base rate like General Service – Secondary Service (S401) which will qualify them for this rider and they have other services on the same account/premise, then this My RECs Rider will apply to all services under this account/premise.
- c) For firm and non-firm Standby customers, are they eligible based on demand at some point in the previous 12 months, by the reservation amount they pay for each month, or some other way?
  - Yes, this will be one way that they can be eligible if their demand qualifies. We would let the customer decide if they are interested in participating in this program.
- d) Irrigation doesn't appear to measure demand. How will Otter Tail determine if an irrigation customer has a demand of 20 kW or greater?
  - With AMI meters we have the ability to measure demand or look at their transformer size.
- e) Outdoor Lighting – Energy Only is also only billed based on energy usage. How will Otter Tail determine if an Outdoor Lighting – Energy Only customer has a demand of 20 kW or greater?
  - There are two ways. We can determine the total connected kW by the lights connected demand. For metered lights with AMI meters, we would have this data as well.
- f) Outdoor Lighting (Closed) is only a fixed amount with no metering. How will Otter Tail determine if an Outdoor Lighting (Closed) customer has a demand of 20 kW or greater?
  - We inadvertently selected this rate and have subsequently defined it as a non-qualifying service in the updated rate schedule 14.14.
- g) LED Street Lighting and Area Lighting is also only a fixed amount with no metering. How will Otter Tail determine if an LED Street Lighting and Area Lighting customer has a demand of 20 kW or greater?
  - We will be looking at the total connected kW as described in the response to question “e”.

During this review of our Applicability Matrix, we identified the need to update proposed rate schedules included with our initial filing. The updates are necessary to correct an unintentional selection and clearly define the rates applicable to the My RECs Rider in our Availability Matrix and our new My RECs Rider.

In our Section 14.00, Availability Matrix, we have removed the check mark from Section 11.04, Outdoor Lighting (CLOSED), as referenced in f) above. For more clarity, an additional “Voluntary Services” section has been added to our Availability Matrix and a new “Determination of My RECs Charge” section has been added to our new My RECs Rider along with additional clarifying language. These changes are shown in detail in the attached redline and clean versions of our Section 14.00 and new Section 14.14 Rate Schedules.