

OTTER TAIL POWER COMPANY
Docket No: EL24-024

Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 01, 2024
Date Due: October 10, 2024
Date of Response: October 11, 2024
Responding Witness: Robert Endris, Associate General Counsel - 218-739-8234

Data Request:

Please provide a copy of all data requests Otter Tail received from any party and Otter Tail's responses to the data requests. This should be considered a continuing request.

Attachments: 0

Response:

OTP will provide copies of responses to other parties' data requests in this matter. As of the date of this response, OTP has not responded to any data requests (formal or informal) from any other party.

OTTER TAIL POWER COMPANY
Docket No: EL24-024

Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 01, 2024

Date Due: October 10, 2024

Date of Response: October 11, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

In its Petition to Intervene and Comments, Otter Tail identifies that it does not contest NZ1's request to have Kingsbury Electric Cooperative be assigned as its electric supplier. Is this still Otter Tail's position? If yes, please explain why Otter Tail didn't agree to an electric service rights exception under SDCL 49-34A-55 that is limited to NZ1's load.

Attachments: 0

Response:

Correct, Otter Tail does not contest NZ1's request to have Kingsbury Electric Cooperative (KEC) be assigned as its electric supplier. However, NZ1's Petition is not clear with respect to the service territory exception it is seeking or precisely whose load it seeks to include in the Petition. While the NZ1 facility is a new customer and the NZ1 Facility is a new load as those terms are used in SDCL § 49-34A-56, the Petition also implies that it is seeking to have KEC serve the entire 245-acre Project Site, including potential third-parties operating inside the Project Site under separate ownership and control. In short, NZ1's Petition asks the Commission to authorize a transfer of Otter Tail's service territory with the effect of restricting Otter Tail's right to serve load in this geographic region and earn associated revenues, thereby directly implicating Otter Tail's and its customers' pecuniary interests.

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that NZ1's facilities will be located outside of Lake Preston's municipal boundaries as the boundaries thereof existed on March 21, 1975? If yes, please provide support for that position.

Attachments: 0

Response:

No.

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Data Request:

Does Otter Tail dispute that NZ1's contracted minimum demand will be less than 2 MWs?

Please explain why or why not.

Attachments: 0

Response:

Otter Tail does not contend that the contracted minimum demand will be less than 2 MWs.

However, Otter Tail has not yet seen documentation establishing a contracted minimum demand.

OTTER TAIL POWER COMPANY

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Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 01, 2024

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Date of Response: October 11, 2024

Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

Please provide a detailed map showing the distance to Otter Tail's existing infrastructure and points of interconnection that would have the capacity to serve the NZ1 load. Further, identify what upgrades Otter Tail would need to make to its transmission and distribution systems to serve the NZ1 load and provide the estimated cost for each upgrade.

Attachments: 1

Attachment 1 to DR SD_PUC_01.05_PUBLIC.pdf

Response:

This response includes information Otter Tail deems to be Confidential Information under ARSD 20:10:01:39 and is provided on the condition that it is not filed or otherwise publicly disclosed pending a determination under ARSD 20:10:01:41 and 20:10:01:42, or an agreement by the parties to this proceeding regarding its disclosure. Such Confidential Information is marked "CONFIDENTIAL" and noted where applicable as [PROTECTED DATA BEGINS...
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Response to Data Request SD-PUC-01.05

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Did Otter Tail work with NZ1 in attempt to meet their energy needs? If yes, please:

- a) explain why Otter Tail believes it was unable to fulfill NZ1's energy requirements,
- b) provide the terms and conditions under which Otter Tail would have provided service to NZ1,
- c) provide the rate at which Otter Tail would have provided service to NZ1,
- d) provide any analysis Otter Tail completed regarding supplying energy to NZ1 and the impacts to Otter Tail's existing customers.

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¹ MISO May 18, 2023 West Technical Study Task Force presentation and recommendation [Microsoft PowerPoint - WTSTF Lake Preston EPR Presentation \(misoenergy.org\)](#) for NZ1 load addition and Otter Tail network upgrades (MTEP project # 23806)

² MISO May 31, 2023 Planning Advisory Committee presentation and recommendation [20230531 PAC Item 04a Expedited Project Reviews629022.pdf \(misoenergy.org\)](#) for NZ1 load addition and Otter Tail network upgrades (MTEP project # 23806)

³ NZ1 load addition and Otter Tail network upgrades were included in the MISO Transmission Expansion Plan Report <https://cdn.misoenergy.org/MTEP23650305.zip> as MTEP project # 23806

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Analyst: SD PUC Staff
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Responding Witness: Robert Endris, Associate General Counsel - 218-739-8234

Data Request:

Is it Otter Tail's position that East River's transmission buildout in Exhibit 5 of NZ1's Petition would not be completed "but for" the NZ1 facility? If yes, please identify each facility within Exhibit 5 that Otter Tail contests would not be required if Kingsbury Electric did not serve NZ1's load.

Attachments: 0

Response:

Otter Tail lacks familiarity with East River's transmission system, current capabilities, and transmission planning studies. However, Otter Tail notes that East River's buildout plans appear to coincide with Gevo changing its preference from Otter Tail to the coop. For example, Otter Tail notes that East River did not inform Otter Tail of a plan to reconductor its 69-kV line serving the reliability interconnection until after Gevo terminated negotiations with Otter Tail.

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Date of Response: October 11, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Given the size of NZ1's demand and energy requirements, please provide:

- a) Otter Tail's current capacity position and reserve margin,
- b) the effect Otter Tail's provision of service to NZ1 would have on Otter Tail's capacity position and reserve margin,
- c) explain how Otter Tail would fulfill NZ1's demand requirements and whether Otter Tail would need to procure or construct additional capacity to cover the NZ1 demand,
- d) the effect Otter Tail serving NZ1 would have on its current customers' rates, and
- e) how Otter Tail would meet the renewable energy needs of NZ1.

Attachments: 0

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Response to Data Request SD-PUC-01.08

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Analyst: SD PUC Staff

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

If East River plans to complete the proposed transmission build out in Exhibit 5, or most of the buildout in Exhibit 5, regardless of whether NZ1 connects to its system, would Otter Tail still incur the \$1.5 to \$2.0 million cost to maintain the emergency tie? If yes, please explain why that should be a factor for consideration in this case.

Attachments: 0

Response:

The potential modifications to the emergency tie is driven by East River's NZ1 service plan to reconnector its 69-kV line to 115-kV. Without that reconductoring, there would be no need to replace the 69-kV to 41.6-kV transformer at that location with a 115-kV to 41.6-kV transformer. Otter Tail interprets this question as assuming that not connecting NZ1 to the East River system means that the NZ1 facility does not get built and/or never goes into commercial operation as a sustainable aviation fuel production facility. It is Otter Tail's position that the Commission should consider that if NZ1 does not get built then Otter Tail should retain its Commission-approved and certified service territory.

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Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 01, 2024
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Date of Response: October 11, 2024
Responding Witness: Stacie Hebert, Manager, FERC/RTO Policy - 218-739-8635

Data Request:

If East River builds out the transmission system as proposed in Exhibit 5 and Otter Tail finds the buildout is excessive and imprudent, can Otter Tail challenge the inclusion of those costs in East River's Annual Transmission Revenue Requirement at FERC? Please explain.

Attachments: 0

Response:

Otter Tail could challenge the inclusion of the buildout costs in East River's Annual Transmission Revenue Requirement ("ATRR") Formula Rate Implementation Protocols; however, there are at least three factors that could make that effort unfruitful. First, the ability to challenge would assume that East River provided enough detail in its ATRR filing to know that the buildout facilities have been included in the forecasted year, or that they were included in a subsequent true-up. Second, the timing of the Formula Rate Implementation Protocols occur in the fall of the year, and depending on when the commitments are made by East River, any challenge by Otter Tail may be made *before* the buildout is being proposed for inclusion in rates (in the Projected Rates), or, if not captured in the Projected information, the timing could be such that the buildout costs are included as a "Notable Facility Change" for the previous year.

Third, the Process allows for information requests to be submitted, but those information requests are limited to what is necessary to determine (from East River's Transmission Formula Rate Implementation Protocols, Section 3. Information Exchange):

- a. The extent or effect of an accounting change;*
- b. Whether the Annual Update fails to include data properly recorded in accordance with the Protocols and the accuracy and consistency of data;*
- c. The proper application of the Formula Rate and procedures in these Protocols;*
- d. The accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update;*
- e. The prudence of projected costs and expenditures;*

f. The effect of any change to the underlying Uniform System of Accounts or Formula Rate Template; or

g. Any other information that may reasonably have a substantive effect on the calculation of the charges pursuant to the Formula Rate. The information and document requests shall not otherwise be directed to ascertain whether the Formula Rate is just and reasonable.

Thus, Otter Tail technically could challenge the buildout under Section 3, i.e. as highlighted. The issue is that the challenge Otter Tail may raise would be technical in nature (whether the buildout facilities were properly sized for the load, versus oversized on a speculative basis to secure future loads) rather than a question on the mechanics of Formula Rates or whether they have been applied properly. Further, complaints at FERC are very expensive to litigate and could take years to resolve long after the Commission issues its order in this proceeding. For that reason, a challenge at FERC seems like a *possible* avenue to challenge the build-out, but maybe not time- or cost-effective.

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Analyst: SD PUC Staff
Date Received: October 01, 2024
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Date of Response: October 11, 2024
Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

Regarding Otter Tail's concerns about SPP transmission cost impacts to its customers, how is this case different from any other SPP UMZ transmission owner building facilities to serve a large customer and then allocating those transmission costs across the SPP UMZ zone?

Attachments: 0

Response:

From a general standpoint, this case would not be any different from any other SPP UMZ transmission owner building facilities to serve a large customer and then allocating those transmission costs across the SPP UMZ zone. However, it differs from any such other load interconnection in that a) it is conditioned upon Commission action to grant a retail service territory exception; b) the buildout to serve a single large customer would not be planned to serve speculative future loads; and c) this Commission would have no jurisdiction over any aspect of such facilities construction if not located in the State of South Dakota.

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Data Request:

Provide CAIDI, SAIDI, and SAIFI reliability index data for the portion of Otter Tail's system that would serve NZ1's load. Also provide a report of outages that would have affected NZ1 over the last three years.

Attachments: 0

Response:

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Date Received: October 01, 2024

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

With specificity, please identify any and all pertinent factors affecting the ability of Kingsbury Electric Cooperative to furnish adequate electric service to fulfill NZ1's requirements that Otter Tail plans to raise at hearing.

Attachments: 0

Response:

Otter Tail currently does not plan to raise factors regarding Kingsbury Electric Cooperative's ability to furnish adequate electric service to fulfill NZ1's requirements. Otter Tail reserves the right to address issues identified through evaluation of testimony and/or responses to discovery.

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Data Request:

In Otter Tail's Petition to Intervene and Comments, Otter Tail claims that "it is not clear that the arrangement NZ1 has made with KEC and its partners will [meet the Sustainable Aviation Fuel requirements]."

- a) Please provide any facts or legal analysis Otter Tail has supporting the claim above.
- b) Given NZ1's preference for Kingsbury Electric Cooperative, why should Otter Tail's claim be factored into the Commission's decision when NZ1 had the ability to decide if Kingsbury Electric's proposed electric service agreement met the sustainable aviation fuel requirements before agreeing to it?

Attachments: 0

Response:

- a) Otter Tail's statement was based on a review of the public version of NZ1's Application which lacks details on the requirements and how its plans will meet them. Otter Tail has not performed a legal analysis of the requirements.
- b) It is Otter Tail's position that the Commission should consider whether a permanent service area exception is warranted if the conditions leading to service requirements and preference do not materialize.

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail have existing facilities providing electric service to the property shown in Exhibit 2 of NZ1's Petition? Please explain.

Attachments: 0

Response:

No. At this time there are no electric loads being served within the property shown in Exhibit 2 of NZ1's Petition.

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Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that NZ1 is a new customer? If yes, please explain.

Attachments: 0

Response:

No. Otter Tail does not dispute that NZ1 is a new customer.

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Data Request:

Does Otter Tail dispute that the location to be served by Kingsbury Electric Cooperative is a new location? If yes, please explain.

Attachments: 0

Response:

No.

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Data Request:

In Otter Tail's Petition to Intervene and Comments, Otter Tail states "the [NZ1] Petition also implies that [NZ1] is seeking to have KEC serve the entire 245-acre Project site, including potential third-parties operating inside the Project Side under separate ownership and control." Please provide the specific language in NZ1's Petition that is asking the Commission to allow KEC to serve all future loads to be located anywhere on the entire 245-acre Project Site.

Attachments: 0

Response:

The concern arises from: a) the map in Exhibit 2 depicting that NZ1 and DRH together occupy only approximately one-half of the 245-acre property suggesting future colocation by other businesses; and b) "SCS and other service providers, to the extent of their on-site operations, may also seek to be electric service customers of KEC for its facility to the extent its load exceeds 2 MW" which seems to imply intent.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Please provide a copy of all data requests Otter Tail received from any party and Otter Tail's responses to the data requests. This should be considered a continuing request.

Attachments: 0

Response:

OTP will provide copies of responses to other parties' data requests in this matter. As of the date of this response, OTP has not responded to any data requests (formal or informal).

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 08, 2024
Date Due: October 18, 2024
Date of Response: October 18, 2024
Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

In its Petition to Intervene and Comments, Otter Tail identifies that it does not contest Dakota Renewable Hydrogen, LLC's (DRH's) request to have Kingsbury Electric Cooperative (KEC) be assigned as its electric supplier. Is this still Otter Tail's position? If yes, please explain why Otter Tail didn't agree to an electric service rights exception under SDCL 49-34A-55 that is limited to DRH's load.

Attachments: 0

Response:

Correct, Otter Tail does not contest DRH's request to have Kingsbury Electric Cooperative (KEC) be assigned as its electric supplier. However, DRH's Petition is not clear with respect to the service territory exception it is seeking or precisely whose load it seeks to include in the Petition. While the DRH facility is a new customer and the DRH Facility is a new load as those terms are used in SDCL § 49-34A-56, the Petition also implies that it is seeking to have KEC serve the entire 245-acre Project Site, including potential third-parties operating inside the Project Site under separate ownership and control. In short, DRH's Petition asks the Commission to authorize a transfer of Otter Tail's service territory with the effect of restricting Otter Tail's right to serve load in this geographic region and earn associated revenues, thereby directly implicating Otter Tail's and its customers' pecuniary interests.

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Data Request:

Does Otter Tail dispute that DRH's facilities will be located outside of Lake Preston's municipal boundaries as the boundaries thereof existed on March 21, 1975? If yes, please provide support for that position.

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Data Request:

Does Otter Tail dispute that DRH's contracted minimum demand will be less than 2 MWs?
Please explain why or why not.

Attachments: 0

Response:

Otter Tail does not contend that the contracted minimum demand will be less than 2 MWs.
However, Otter Tail has not yet seen documentation establishing a contracted minimum demand.

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Date Received: October 08, 2024

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Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

Please provide a detailed map showing the distance to Otter Tail’s existing infrastructure and points of interconnection that would have the capacity to serve the DHR load. Further, identify what upgrades Otter Tail would need to make to its transmission and distribution systems to serve the DRH load and provide the estimated cost for each upgrade.

Attachments: 1

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- b) provide the terms and conditions under which Otter Tail would have provided service to DRH,
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³ DRH load addition and Otter Tail network upgrades were included in the MISO Transmission Expansion Plan Report <https://cdn.misoenergy.org/MTEP23650305.zip> as MTEP project # 23806

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Data Request:

Is it Otter Tail's position that East River's transmission buildout in Exhibits 5-1 through 5-4 of DRH's Petition would not be completed "but for" the DRH facility? If yes, please identify each facility within Exhibits 5-1 through 5-4 that Otter Tail contests would not be required if Kingsbury Electric did not serve DRH's load.

Attachments: 0

Response:

Otter Tail lacks familiarity with East River's transmission system, current capabilities, and transmission planning studies. However, Otter Tail notes that East River's buildout plans appear to coincide with Gevo changing its preference from Otter Tail to the coop. For example, Otter Tail notes that East River did not inform Otter Tail of a plan to reconductor its 69-kV line serving the reliability interconnection until after Gevo terminated negotiations with Otter Tail.

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Data Request:

Given the size of DHR's demand and energy requirements, please provide:

- a) Otter Tail's current capacity position and reserve margin,
- b) the effect Otter Tail's provision of service to DRH would have on Otter Tail's capacity position and reserve margin,
- c) explain how Otter Tail would fulfill DRH's demand requirements and whether Otter Tail would need to procure or construct additional capacity to cover the DRH demand,
- d) the effect Otter Tail serving DRH would have on its current customers' rates, and
- e) how Otter Tail would meet the renewable energy needs of DRH.

Attachments: 0

Response:

This response includes information Otter Tail deems to be Confidential Information under ARSD 20:10:01:39 and is provided on the condition that it is not filed or otherwise publicly disclosed pending a determination under ARSD 20:10:01:41 and 20:10:01.42, or an agreement by the parties to this proceeding regarding its disclosure. Such Confidential Information is marked "CONFIDENTIAL" and noted where applicable as [PROTECTED DATA BEGINS...
...PROTECTED DATA ENDS].

[PROTECTED DATA BEGINS...

PUBLIC – TRADE SECRET DATA HAS BEEN EXCISED

Response to Data Request SD-PUC-01.08

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OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

If East River plans to complete the proposed transmission build out in Exhibits 5-1 through 5-4, or most of the buildout represented there-in, regardless of whether DRH connects to its system, would Otter Tail still incur the \$1.5 to \$2.0 million cost to maintain the emergency tie? If yes, please explain why that should be a factor for consideration in this case.

Attachments: 0

Response:

The potential modifications to the emergency tie is driven by East River's NZ1 service plan to reconnector its 69-kV line to 115-kV. Without that reconductoring, there would be no need to replace the 69-kV to 41.6-kV transformer at that location with a 115-kV to 41.6-kV transformer. Otter Tail interprets this question as assuming that not connecting NZ1/DRH to the East River system means that the NZ1 facility does not get built and/or never goes into commercial operation as a sustainable aviation fuel production facility. It is Otter Tail's position that the Commission should consider that if NZ1 does not get built then Otter Tail should retain its Commission-approved and certified service territory.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 08, 2024
Date Due: October 18, 2024
Date of Response: October 18, 2024
Responding Witness: Stacie Hebert, Manager, FERC/RTO Policy - 218-739-8635

Data Request:

If East River builds out the transmission system as proposed in Exhibits 5-1 through 5-4 and Otter Tail finds the buildout is excessive and imprudent, can Otter Tail challenge the inclusion of those costs in East River's Annual Transmission Revenue Requirement at FERC? Please explain.

Attachments: 0

Response:

Otter Tail could challenge the inclusion of the buildout costs in East River's Annual Transmission Revenue Requirement ("ATRR") Formula Rate Implementation Protocols; however, there are at least three factors that could make that effort unfruitful. First, the ability to challenge would assume that East River provided enough detail in its ATRR filing to know that the buildout facilities have been included in the forecasted year, or that they were included in a subsequent true-up. Second, the timing of the Formula Rate Implementation Protocols occur in the fall of the year, and depending on when the commitments are made by East River, any challenge by Otter Tail may be made *before* the buildout is being proposed for inclusion in rates (in the Projected Rates), or, if not captured in the Projected information, the timing could be such that the buildout costs are included as a "Notable Facility Change" for the previous year.

Third, the Process allows for information requests to be submitted, but those information requests are limited to what is necessary to determine (from East River's Transmission Formula Rate Implementation Protocols, Section 3. Information Exchange):

- a. The extent or effect of an accounting change;*
- b. Whether the Annual Update fails to include data properly recorded in accordance with the Protocols and the accuracy and consistency of data;*
- c. The proper application of the Formula Rate and procedures in these Protocols;*
- d. The accuracy of data and consistency with the Formula Rate of the calculations shown in the Annual Update;*
- e. The prudence of projected costs and expenditures;*
- f. The effect of any change to the underlying Uniform System of Accounts or Formula Rate Template; or*

g. Any other information that may reasonably have a substantive effect on the calculation of the charges pursuant to the Formula Rate. The information and document requests shall not otherwise be directed to ascertain whether the Formula Rate is just and reasonable.

Thus, Otter Tail technically could challenge the buildout under Section 3, i.e. as highlighted. The issue is that the challenge Otter Tail may raise would be technical in nature (whether the buildout facilities were properly sized for the load, versus oversized on a speculative basis to secure future loads) rather than a question on the mechanics of Formula Rates or whether they have been applied properly. Further, complaints at FERC are very expensive to litigate and could take years to resolve long after the Commission issues its order in this proceeding. For that reason, a challenge at FERC seems like a *possible* avenue to challenge the build-out, but maybe not time- or cost-effective.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 08, 2024
Date Due: October 18, 2024
Date of Response: October 18, 2024
Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

Regarding Otter Tail's concerns about SPP transmission cost impacts to its customers, how is this case different from any other SPP UMZ transmission owner building facilities to serve a large customer and then allocating those transmission costs across the SPP UMZ zone?

Attachments: 0

Response:

From a general standpoint, this case would not be any different from any other SPP UMZ transmission owner building facilities to serve a large customer and then allocating those transmission costs across the SPP UMZ zone. However, it differs from any such other load interconnection in that a) it is conditioned upon Commission action to grant a retail service territory exception; b) the buildout to serve a single large customer would not be planned to serve speculative future loads; and c) this Commission would have no jurisdiction over any aspect of such facilities construction if not located in the State of South Dakota.

OTTER TAIL POWER COMPANY
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Analyst: SD PUC Staff
Date Received: October 08, 2024
Date Due: October 18, 2024
Date of Response: October 18, 2024
Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

In Otter Tail's Petition to Intervene and Comments, Otter Tail states "Otter Tail's load in the SPP zone pays SPP tariff charges meaning that Otter Tail customers must help to pay for this potentially excessive buildout through pancaked rates." Otter Tail's Petition to Intervene and Comments further states "[r]equiring Otter Tail's customers to bear these costs, is contrary to the public policy that underpins South Dakota's exclusive territory statutes."

- a) Please quantify the forecasted additional transmission expense that will be charged to Otter Tail's customers as a result of the proposed build out by East River.
- b) Provide any supporting information and all calculations that were used to determine the forecasted additional transmission expense provided in subpart a).

Attachments: 0

Response:

- a) Otter Tail has not quantified the forecasted additional transmission expense that will be charged to Otter Tail's customers as a result of the proposed build out by East River. Otter Tail has not yet received unredacted data regarding East River's forecasted additional transmission expense associated with the buildout.
- b) See the response to (a) above.

OTTER TAIL POWER COMPANY

Docket No: EL24-025

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Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Dylan Stupca, Manager Delivery Planning - 218-739-8980

Data Request:

Provide CAIDI, SAIDI, and SAIFI reliability index data for the portion of Otter Tail’s system that would serve DRH’s load. Also provide a report of outages that would have affected DRH over the last three years.

Attachments: 0

Response:

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OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission
Analyst: SD PUC Staff
Date Received: October 08, 2024
Date Due: October 18, 2024
Date of Response: October 18, 2024
Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

With specificity, please identify any and all pertinent factors affecting the ability of Kingsbury Electric Cooperative to furnish adequate electric service to fulfill DRH's requirements that Otter Tail plans to raise at hearing.

Attachments: 0

Response:

Otter Tail currently does not plan to raise factors regarding Kingsbury Electric Cooperative's ability to furnish adequate electric service to fulfill DRH's requirements. Otter Tail reserves the right to address issues identified through evaluation of testimony and/or responses to discovery.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

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Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail have existing facilities providing electric service to the property shown in Exhibits 2-1 and 2-2 of DRH's Petition? Please explain.

Attachments: 0

Response:

No. At this time there are no electric loads being served within the property shown in Exhibit 2 of DRH's Petition.

OTTER TAIL POWER COMPANY
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Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that DRH is a new customer? If yes, please explain.

Attachments: 0

Response:

No. Otter Tail does not dispute that DRH is a new customer.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 08, 2024

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Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that the location to be served by Kingsbury Electric Cooperative is a new location? If yes, please explain.

Attachments: 0

Response:

No.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

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Analyst: SD PUC Staff

Date Received: October 08, 2024

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Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that KEC, East River, and Basin Electric Cooperative will have an adequate power supply to serve DRH and Gevo Net-Zero 1 (NZ1) loads? If yes, please explain.

Attachments: 0

Response:

No.

OTTER TAIL POWER COMPANY
Docket No: EL24-025

Response to: SD Public Utilities Commission

Analyst: SD PUC Staff

Date Received: October 08, 2024

Date Due: October 18, 2024

Date of Response: October 18, 2024

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

Data Request:

Does Otter Tail dispute that KEC will be able to provide reliable service to DRH and NZ1 loads?
If yes, please explain.

Attachments: 0

Response:

No.