

OTTER TAIL POWER COMPANY
Docket No: EL26-011

Response to: SD Public Utilities Commission

Analyst: Eric Paulson

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Date of Response: May 28, 2026

Responding Witness: Cristina Zuniga, Supervisor, DSM Administration - 218-739-8240

Data Request:

Does OTP have any concerns with the increase in efficiency standards to 120 lumens per watt for LED light bulbs starting in 2028 and the necessity to continue offering an LED program when other technologies cannot meet this requirement?

Attachments: 0

Response:

The Company is aware of efficiency standards increasing to 120 lumens per watt in 2028 and anticipates that the change will eventually appear in future versions of the Minnesota Technical Reference Manual (TRM) used by Otter Tail Power for efficiency calculations. The Company has traditionally prepared triennial efficiency standards, and the corresponding energy savings calculations in these plans, using the current TRM database in place for use for that triennial period. For the current triennial plan (2024-2026) Otter Tail Power used the 4.0 version of the TRM. Consequently, energy savings calculations for Otter Tail Power's residential upstream lighting program are currently based on a baseline efficient lamp efficacy of 45 lumens per watt per the TRM database. This current efficacy reduces energy savings to about 1/3 compared to earlier TRM versions using incandescent lamps as the baseline technology.

The Company's current plan is to file the 2027—2029 South Dakota EEP Plan using the baseline assumptions in TRM 5.0, which specifies 45 lumens per watt as the baseline lamp efficacy. Starting on July 25, 2028, the increased efficiency standard requires manufactured or imported bulbs must meet the 120 lumens per watt, however existing inventory bulbs are not banned and will still be in the marketplace. The Company will propose to use the 120 lumen per watt baseline efficacy, or an approved higher standard, for LED lamps beyond 2029.