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October 4, 2021

Mr. Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0408

**RE: In the Matter of the Public Service Commission Standards of Service – Electric
Rulemaking
Case No. PU-21-360
Comments**

Dear Mr. Kahl:

Enclosed please find an original and seven copies of Otter Tail Power Company's Comments in the above referenced rulemaking matter.

Please contact me at (218) 739-8657, or molsen@otpc.com should you have any questions regarding this filing.

Very truly yours,

/s/ MATTHEW J. OLSEN
Matthew J. Olsen
Manager Regulatory Proceedings and Compliance

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Enclosures
By Email and USPS mail

14 PU-21-360 Filed 10/04/2021 Pages: 6
Comments on proposed Rules
Otter Tail Power Company
Matthew Olsen

**STATE OF NORTH DAKOTA
BEFORE THE PUBLIC SERVICE COMMISSION**

**Public Service Commission
Standards of Service – Electric
Rulemaking**

Case No. PU-21-360

**COMMENTS OF OTTER TAIL
POWER COMPANY**

I. BACKGROUND

On August 18, 2021, the North Dakota Public Service Commission (Commission) issued a Motion and a Notice of Intent to Adopt Administrative Rules and Notice of Public Hearing. The proposed adoption and revisions are to North Dakota Administrative Code Section 69-09-02-06.

The purpose of the proposed new section 69-09-02-06 is to establish rules and guidelines as directed by the Legislature for assessment of penalties, fines, or disallowances if an electric public utility fails to meet its obligation to provide reliable service to customers within the state. The Commission's proposed rules also clarify information required and the manner in which electric public utilities shall report records and statistics relating to reliable service to its customers.

A Public hearing was held on September 22, 2021. Otter Tail Power Company (Otter Tail or Company) participated in that hearing along with other utilities and stakeholders. Below are additional comments regarding the proposed rules.

II. COMMENTS

Otter Tail tracks and analyzes reliability on an on-going basis. The Company uses particular metrics that provide useful ways to assess the impacts on customers of reliability performance. This tracking allows the Company to focus or deploy maintenance and construction projects to improve reliability in the most effective manner.

The integrity of Otter Tail's entire transmission and distribution system is directly related to interruption frequency; thus, the accountability lies within our Asset Management area. Otter Tail's Asset Management area is accountable for the planning, engineering and design, execution, operation and on-going maintenance and reliability oversight to ensure that we provide reliable and affordable electric service to our customers. At Otter Tail, we employ a system of Key Performance Indicators (KPIs), for the purpose of providing additional focus on achievement in particular areas of our operations. Two of Asset Management's KPIs are reliability indices dealing with interruption frequency: the Momentary Average Interruption Frequency Index (MAIFI) and System Average Interruption Frequency Index (SAIFI).

Otter Tail's Customer Service area is accountable for responding to all interruptions. Thus, Otter Tail's Customer Service area is accountable for the cost effective and efficient deployment of field personnel, trucks, and equipment as quickly and safely as possible, necessary for restoring service to customers when interruptions occur. One of the Customer Service area's KPIs is Customer Average Interruption Duration Index (CAIDI). Additionally, the Reliability indices, SAIDI, SAIFI, CAIDI, and MAIFI are companywide KPI's. These indices are communicated and reviewed with all impacted employees, on a monthly basis, with the expectation that all employees remain cognizant of our company's reliability performance.

The Asset Management and Customer Service areas have a common goal, which is to improve the overall system reliability. Each area recognizes the overall system improvement cannot be accomplished without collaboratively working with the other area. Each area also recognizes system reliability improvements are based on cost effective decisions and overall system improvements over longer periods of time.

A. Metrics Currently Captured and Reporting Capabilities

Otter Tail currently tracks reliability using a specialized interruption monitoring system (IMS). The system utilizes meters placed on distribution feeders throughout the Company's system. The system has several reporting options available, though not all the metrics included in the proposed rules are included. Currently, OTP's system can report on the following metrics:

- system average interruption frequency index (SAIFI)
- system average interruption duration index (SAIDI)
- customer average interruption duration index (CAIDI)

- customer total average interruption duration index (CTAIDI)
- customer average interruption frequency index (CAIFI)
- momentary average interruption frequency index (MAIFI)
- average service availability index (ASAI)
- customers experiencing multiple interruptions (CEMI-5, which would report percentage of customers experiencing 5 or more sustained interruptions)
- customers experiencing long interruption durations (CELID-s60, which would report the percentage of customers experiencing interruption >60 minutes)
- customers experiencing multiple sustained and momentary interruptions (CEMSMI-5, reports customers experiencing 5 or more sustained or momentary interruptions)
- Otter Tail also assess Major Event Days to exclude such events from reliability metrics utilizing the IEEE 2.5 Beta Methodology.

Otter Tail currently reports some of these metrics in other jurisdictions and could provide them in a filing to the Commission as desired. Importantly, these metrics can be programed to be reported at the feeder, Customer Service Center, or state levels. Otter Tail's rural distribution system will have instances where multiple smaller towns may be served by a single feeder.

The Commission's proposal sought additional metrics that are beyond the Company's current reporting abilities as described below.

- customers experiencing multiple interruptions CEMI at levels other than 5 would have to be calculated manually.
- customers experiencing multiple sustained interruption and momentary interruption events (CEMSMI) at levels other than 5 would have to be calculated manually.
- average system interruption frequency index (ASIFI), **is not possible** based our company's available data collection systems.
- average system interruption duration index (ASIDI), **is not possible** based our company's available data collection systems.

For the above possible items that would require additional labor for manual calculations, the Company estimates 20 hours by an engineer for each additional metric.

B. Will Advanced Metering Infrastructure improve reporting capabilities?

The Commission approved an Advance Determination of Prudent for Otter Tail to deploy Advanced Metering Infrastructure (AMI) for our system. The AMI system will bring many great benefits to our system and ability to capture data. Once fully deployed (end of 2024), AMI will provide greater granularity to improve the speed and accuracy of a future Outage Management System as described below.

Otter Tail is currently working to select a vendor to provide an Outage Management System. The OMS provides both operational and customer engagement benefits. The main benefits are more quickly and safely restoring power to customers when there are interruptions as well as being able to communicate information about restoration efforts to customers. As it relates to this filing, the OMS will also replace the current IMS Otter Tail uses to calculate reliability metrics. The OMS will provide greater granularity in reliability reports vs the current feeder level report we are able to complete today with our IMS. The tracking and reporting with an OMS will be at the customer or location level. Pre-AMI, this information will come in the form of customer calls or texts during outages and post-AMI, the outage location information will be fed from the AMI system into OMS based on meter “power-off” notifications in addition to any calls and texts that come from customers. In addition to more granular reporting, the OMS will allow us to report on the same metrics we can report on today. However, it may not provide the additional metrics listed in the Commission’s proposed rule which Otter Tail is unable to provide today. That won’t be known until early 2022 as we finalize our OMS vendor.

C. Timing of an annual filing

After the close of a year, much of the first quarter of the following year is spent gathering and sorting data that is used for to compile these metrics. Otter Tail currently files a report to the Minnesota Public Utilities Commission on April 1 that includes several of the reliability metrics as described above. If additional manual calculations are required, the Company would request additional time beyond April 1 to prepare those calculations. For the metrics available through our software system as currently designed, we can achieve an April 1 filing. There may also, however, be efficiency in including these metrics with the Company’s annual reports filed on or around May 1 of each year.

III. CONCLUSION

Otter Tail appreciates the opportunity to provide these comments for the Commission's consideration.

Dated: October 4, 2021.

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ MATTHEW J. OLSEN

Matthew J. Olsen

Manager, Regulatory Proceedings and Compliance

Otter Tail Power Company

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