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October 21, 2021

Steve Kahl  
Executive Secretary  
ND Public Service Commission  
600 East Boulevard Avenue  
Bismarck, ND 58505-0480

**RE: In the Matter of Otter Tail Power Company's Application for Approval to Suspend  
the Sample Meter Test Performance Report  
Case No. PU-21-**

Dear Mr. Kahl:

Enclosed please find an original and seven (7) copies of Otter Tail Power Company's (Otter Tail) Application to the North Dakota Public Service Commission for approval to suspend sample meter test performance reporting.

In this matter, there is no filing fee for a waiver request from the tariff and rules.

An electronic copy of this filing is being sent to you at [ndpsc@nd.gov](mailto:ndpsc@nd.gov). If you have any questions, please contact me at (218) 739-8401 or [asmith@otpc.com](mailto:asmith@otpc.com).

Sincerely,

*/s/ ANNALISE SMITH*  
Annalise Smith  
Load Researcher, Regulatory Administration

kaw  
Enclosures  
By electronic filing

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

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In the Matter of Otter Tail Power  
Company's Application for Approval  
to Suspend the Sample Meter Test  
Performance Report

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**Case No. PU-21-  
APPLICATION**

**I. INTRODUCTION**

Otter Tail Power Company (Otter Tail or Company) requests the North Dakota Public Service Commission (Commission) approve a request to temporarily suspend sample meter test performance reporting. Specifically, Otter Tail requests approval to deviate from North Dakota Rule 69-09-02-28 (3). The request is in preparation for Advanced Metering Infrastructure (AMI) meter installation.

**II. GENERAL FILING INFORMATION**

Pursuant to § 69-02-02-04 of the Commission's Rules of Practice and Procedure, the following information is provided:

**A. Name, address, and telephone number of the utility making the filing**

Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
Phone (218) 739-8200

**B. Name, address, and telephone number of utility attorney**

Robert M. Endris  
Associate General Counsel  
Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
Phone (218) 739-8234

**C. Title of utility employee responsible for filing**

Annalise Smith  
Load Researcher  
Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8401

**D. The date of filing and the date changes will take effect**

The date of this filing is October 21, 2021. Otter Tail proposes an effective date of January 1, 2022, for the suspension of sample meter testing.

**E. Other requirements of North Dakota Rules Part 69-02-02-04**

A certified copy of Otter Tail's Articles of Incorporation is on file with the Commission, as is an original certificate of good standing.

**F. Customer Notification**

Otter Tail will not include a notice to North Dakota customers since this request will not affect billing.

**III. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

Otter Tail's existing meter testing plan requires a sample of meters to be tested each year from each lot (group) of meters. Additionally, North Dakota Rule 69-09-02-28 (3) requires a summary report of meter tests made during the year to be filed annually.

Otter Tail is implementing its AMI program to replace all non-AMI meters. This implementation will start in 2022 and continue through the end of 2024. Due to implementation of AMI meters, Otter Tail requests approval to deviate from the existing testing plan and temporarily suspend testing as Otter Tail transitions its meter fleet from manually read meters to AMI meters.

## **B. AMI Investment**

The Commission recently approved Otter Tail's Advance Determination of Prudence (ADP) for the AMI and Outage Management projects, Case No. PU-21-083. Reasons for investing in AMI include reliability improvements, enhanced customer control, and cost savings.

## **C. Proposed Meter Testing Suspension Plan**

Otter Tail is proposing to suspend the Sample Meter Test Performance Report due to a full implementation of AMI meters. This implementation will provide Otter Tail with a complete system of new meters which will limit the amount of potential risk for errors in our fleet of meters. Otter Tail notes that its 2021-meter test results met all requirements, and further notes that Otter Tail has not had a failed sample since 2012. This evidence demonstrates that it is reasonable to conclude that existing meters will continue to similarly perform through the fleet transition and that it is reasonable to temporarily suspend sample meter testing of the installed fleet beginning in 2022.

In 2022, a pilot program of approximately 1,000 meters will be installed in the Fergus Falls, MN area. The intent of the pilot is to validate the functionality of the AMI system prior to full deployment of the AMI meter fleet. Following the pilot program phase, deployment of approximately 175,000 AMI meters companywide will begin in 2023 and continue through 2024. Otter Tail will receive meter accuracy test reports from the manufacturer for each AMI meter received. Otter Tail will also perform an accuracy test of randomly selected AMI meters from each meter order prior to release for deployment. In 2025, most AMI meters would be less than one year old. Otter Tail would use this year to allow the new system to settle in. This "settling in" year would allow Otter Tail to become familiar with the new AMI system and prepare for sample metering testing to resume in 2026.

Otter Tail thus proposes to suspend the existing meter testing plan from 2022-2025 with sample meter testing reinstated in 2026. Otter Tail will submit an updated meter testing plan to the Commission by end of Q3 of 2025 regarding a proposed plan for testing for 2026.

In preparing the meter testing suspension plan, Otter Tail considered the Commission's precedence with another utility's new meter deployment experience and what steps were taken during and after testing suspension.<sup>1</sup>

**D. No Proposed Changes to Otter Tail General Rules and Regulations, Section 4.04**

Otter Tail reviewed Section 4.04, Meter Testing and Meter Failure. There are no proposed changes to Section 4.04. Otter Tail will continue to abide by Section 4.04.

**E. Meter Testing During Suspension**

Otter Tail proposes the following activities throughout the suspension period:

- 100% of AMI meters will have manufacturer testing prior to delivery.
- Batch testing of all new meters received using Military Standard 414 protocols.
- Utilize technology to check for usage and bill anomalies.
- Process customer requests to test meter.

**IV. CONCLUSION**

Otter Tail respectfully requests the Commission approve its request to deviate from the existing meter testing plan in order to temporarily suspend testing from 2022-2025 as provided in this application.

Date: October 21, 2021

Respectfully submitted:

OTTER TAIL POWER COMPANY

/s/ ANNALISE SMITH

Annalise M. Smith, Load Researcher  
Regulatory Administration  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
Phone (218) 739-8401

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<sup>1</sup> Montana Dakota Utilities (MDU) requested to deviate from their existing gas meter testing plan in 2009. Otter Tail is following a similar approach to request the suspension of meter testing during AMI meter deployment.