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December 12, 2023

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 Otter Tail Power Company's Application for Approval of
Tariff Changes to Facilitate Implementation of New Advanced Metering
and Distribution Technology (AMDT) systems and a Variance to
Commission Rules
Case No. PU-23-275
Amended Filing**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail) hereby submits to the North Dakota Public Service Commission (Commission) an Amended Filing in the above-referenced matter.

An original and copies have been sent to you via USPS.

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

Sincerely,

/s/ MATTHEW J. OLSEN
Matthew J. Olsen
Manager Regulatory Strategy & Compliance

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Enclosures
By electronic filing and U.S. mail

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

**In the Matter of Otter Tail Power
Company's Application for
Approval of Tariff Changes to
Facilitate Implementation of New
Advanced Metering and
Distribution Technology (AMDT)
systems and a Variance to
Commission Rules**

Case No. PU-23-275

AMENDED FILING

I. BACKGROUND

Otter Tail Power Company (Otter Tail or Company) filed its initial Application of Tariff Changes to Facilitate Implementation of New Advanced Metering and Distribution Technology systems and Variance to Commission Rules (Application) in this docket on July 25, 2023 with the North Dakota Public Service Commission (Commission). The Commission held an Informal Hearing on September 27, 2023 and a Work Session on October 11, 2023. The Application in this matter proposed tariff changes to facilitate the Company's implementation of Advanced Metering Infrastructure (AMI) meters, including a proposal to not allow customers to opt-out of a communicating advanced meter and the proposed costs if customers are allowed to opt-out. The Commission provided feedback on this proposal during the Informal Hearing and the Work Session. This filing adjusts the Company's proposal to address this feedback. To avoid confusion by the caption of this docket, Otter Tail notes the name of the rider in which costs of the AMI project are collected was updated in parallel with this docket (Case No. PU-23-283) to Metering & Distribution Technology (MDT) rider.

II. COMMENTS

The company recognizes the interest in allowing customers the choice to opt-out of a communicating advanced meter. The Company included proposed charges in the Application to accommodate this choice while minimizing the extent of cross subsidization implicated by a customer's choice to opt-out of a communicating advanced meter. The charges included in the Application include an upfront charge and a monthly charge for customers who opt-out.

A. Up-front Opt-Out Charge

Otter Tail originally proposed an up-front opt-out charge of \$226.82. This charge would account for the labor and deployment of staff to replace a communicating advanced meter for an advanced meter with the communications capabilities disabled. This charge would also include the costs to again replace the meter with a communicating meter when the customer relocates so the next customer served in that location has a communicating meter. The Commission recognized that Otter Tail's distribution system is unique from other utilities, particularly those serving more densely populated areas of the state. At the same time, there was interest in reducing the cost to customers who choose to opt-out of a communicating advanced meter.

Otter Tail proposes the up-front opt-out charge be \$120. This is a substantial reduction to the original proposal (a reduction of 47 percent). This charge would reduce the hurdle to customers who chose this option while recovering a portion to the costs incurred to provide this option for those specific customers.

B. Monthly Opt-Out Charge

One of the primary advantages of Advanced Metering Infrastructure is the ability for Otter Tail to receive meter readings via communications technology that avoid physical in-person meter reading. Opting-out of a communicating meter would require a Company Service Representative to visit the premise to read the meter, perhaps requiring a long drive for the sole purpose of reading a single meter. The Company would certainly seek to optimize this effort to efficiently capture readings during other work, but this may not line up with even intervals necessary for billing. Otter Tail originally proposed a monthly meter reading charge of \$80.10, which is reflective of the average cost to manually read meters.

While again recognizing the needs of the Company's vast rural system, the Commission expressed a desire for this monthly charge to be substantially lower. The Company can accept a lower monthly charge, such as \$20, with the recognition that the difference in this charge and actual costs will be collected from all other customers. The accumulated actual cost of meter reading beyond the amount collected by these fees would be netted against savings that customers might otherwise receive through the MDT rider.

C. Tariff Changes

The Company's proposed terms and conditions for customers who opt-out of a communicating advanced meter, including eligibility, remains as stated in the Application. Tariff updates consistent with a Commission decision on opt-out fees will be included in a compliance filing.

D. Variance Request

The Application also included a request for a variance from North Dakota Administrative Code 69-09-02-11, section 2 regarding presenting meter readings on bills after installation of an advanced meter. The Application described that the functionality of the advanced meter will capture consumption in intervals that will be combined over the billing period. The total consumption over the billing period will be presented on the bill as it has historically. The Commission asked the Company whether the meter readings could also be displayed even after advanced meters are installed. The most significant concern is bill presentment. Meter reads could only be provided for customers on basic rates. Customers on more complex rates such as time-of-use or controlled service rates, cannot have meter reads displayed. In these instances, customers would have a meter for which the readings would be displayed and another where no meter readings could be displayed on the same bill. This situation could lead to confusion for these customers.

Otter Tail sought input from the internal staff and vendors supporting the AMI project whether this was achievable. The response was that it would be possible to display this information on bills for customers on basic rates with the necessary programming changes in the Company's meter data management system and billing software. However, the time to implement that programming change and test it, if required prior to deployment of the advanced meters, would delay the overall project, perhaps significantly. To allow the AMI deployment to remain on the current project schedule, the Company maintains its request for this variance. To address concerns about not displaying meter readings, the Company also commits to monitoring customer contacts regarding such presentment on bills. If displaying this information on bills is the best solution in the future, the Company can reassess this issue.

III. CUSTOMER INFORMATION BROCHURE

Included with this filing is an updated Customer Information Brochure correctly identifying when disconnection notices are sent. Otter Tail does not send out disconnection notices for "unauthorized use of or tampering with our company's equipment" and "conditions determined to be hazardous to the customer, other customers, our equipment, or the public." In our efforts to make this brochure easier for our customers to read, this was incorrectly stated during the rearranging of the content and updates to the narrative.

IV. CONCLUSION

Otter Tail appreciates the Commission's consideration of this request. The Company requests the Commission approve the Application with the changes described above.

Dated: December 12, 2023

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ MATTHEW J. OLSEN

Matthew J. Olsen

Manager Regulatory Strategy & Compliance

Otter Tail Power Company

215 South Cascade Street

Fergus Falls, MN 56538-0496

(218)739-8657

- b. The customer may be present or have a representative present during the meter test.
- c. We'll give our report to the customer within one week. The report outlines test results and provides relevant metering information.

Meter reading and estimates

We read meters every month unless the North Dakota Public Service Commission authorizes another meter-reading interval upon our company's petition. When your meter isn't read, we automatically review your consumption history and estimate your meter reading. We indicate estimated readings on your statement. Customers in remote locations who read their own meters may submit meter reading forms on our website at otpc.com or by mailing us a completed meter reading card, which we provide on a yearly basis to all self-read customers. Learn more at otpc.com/MyMeter.

Additional information

The information below includes company policies based on rules and regulations from the North Dakota Public Service Commission.

Deposits

If we require a customer to make a deposit, it won't exceed the actual or estimated 60-day average bill charge as authorized by the North Dakota Public Service Commission. Our company pays annual interest on all deposits at a rate paid by the Bank of North Dakota for its smallest six-month certificate of deposit determined the first business day of each year. We apply interest earned as a credit on a customer's December bill. And we refund the deposit, plus any accrued interest, after 12 consecutive months of prompt payments.

Rather than a cash deposit, we may accept a written guarantee of payment from another source. The guarantee agreement automatically ends when the first of the following occurs:

- (a) the customer gives our company notice of service discontinuance,
- (b) the customer gives our company notice of a change in location covered by the guarantee agreement,

or (c) 30 days after a written request from the guarantor to terminate the guarantee agreement. We won't terminate a guarantee agreement without the customer first having made satisfactory settlement for any balance owed. Upon termination of a guarantee agreement, we may require a new guarantee agreement or deposit.

Service relock charge

We charge a fee of \$100 for reconnecting service we've disconnected and subsequently returned to relock after service was reconnected without company authorization. This charge is in addition to any charges that may be due because of the unauthorized reconnection (Section 3.02 of our General Rules and Regulations).

Reconnection policy

Reconnection charges apply to new accounts and reconnection following nonpayment or a disconnection at the customer's request.

If it's necessary to disconnect a customer's service for a valid cause and the condition is corrected, customers may have to pay a reconnection fee based on the cost of restoring service.

When we disconnect service for nonpayment, the following reconnection conditions apply:

- The customer must make a payment toward the electric service bill, including late-payment charges.
- The customer must pay a reconnection charge of \$15, plus additional direct labor charges for overtime if we made the reconnection outside of regular working hours.
- The customer may need to pay a deposit or an increase to an existing deposit.

When we disconnect service because of a hazardous condition, we do not charge for reconnection.

We're regulated by the North Dakota Public Service Commission. Customers may contact the North Dakota Public Service Commission at 877-245-6685 to discuss unresolved differences.

North Dakota customer information



Contact us

Whether you need to report an outage, start or transfer service, or ask a question about your bill, we're here to help. Our Customer Service team is available for general questions during business hours, Monday through Friday from 8 a.m. to 5 p.m., and for outages and emergencies 24/7. Call us at **800-257-4044** or **218-739-8877**.

Outage and emergency service

Immediately report outages or emergencies, such as those caused by storms or accidents, at any time by calling us. Our crews respond to service interruptions day or night and on weekends and holidays. Examples of emergencies include power outages, downed power lines, disconnected services, or other circumstances that may affect electric service to your home or business.

Before calling to report an outage, always check your service panel to make sure you haven't blown a fuse or tripped a circuit breaker. We'll restore service without a charge if the outage is a result of our equipment failure.

Find near real-time outage information, updates, and a map at otpc.com/outages.

Billing and account information

Service connection

Our primary responsibility is to provide safe, reliable, and cost-effective electricity to our customers. To cover the costs associated with setting up your new electric account, we'll include a one-time \$15 service connection fee on your first electric service statement.

Stop, transfer, or start new electric service by calling our Customer Service team during business hours or using our self service forms available at otpc.com/service. Please notify us two business days before you require routine service.

If the costs for extending service aren't justified, we may require a signed customer contract guaranteeing a minimum payment of no less than three years use of electric service. We also may require the customer to make an advance payment to guarantee this minimum amount of revenue.

Ways to pay

We offer a variety of secure payment options including online, by phone, or through mail at one of our drop-box locations. Explore the different programs available to help you manage and pay your bill below or find the right payment plan for you at otpc.com/PaymentOptions.

Programs to help manage and pay your bill

The **My Account** payment portal at otpc.com allows you to view and pay your bills with automatic or self-scheduled electronic payments using a bank account, credit card, or debit card (fees and limits may apply). You can also subscribe to receive email and text notifications about your electric service. To register you'll need your electric service account number and your service location zip code.

Ready Check automatically withdraws your monthly electric payments from your bank account. With Ready Check you authorize your bank to automatically pay your electric bill each month so you can avoid late or missed payments, write fewer checks, continue to receive paper bills, and pick your payment date range.

Our **Even Monthly Payment (EMP)** plan averages your electric bills from the past 12 months to project your monthly payments for the next year. Whether it's the biting cold of January or the searing heat of August, you'll pay the same amount each month. We'll review your account a few times a year and adjust your EMP amount if your electric use changes significantly. We'll also pay interest on your average daily credit balance. And if EMP doesn't work for you, you can return to conventional billing at any time.

Payment assistance

If you're concerned about paying your bill for electric service, give us a call right away so we can work together to make a plan. Visit otpc.com/HelpPaying for more information.

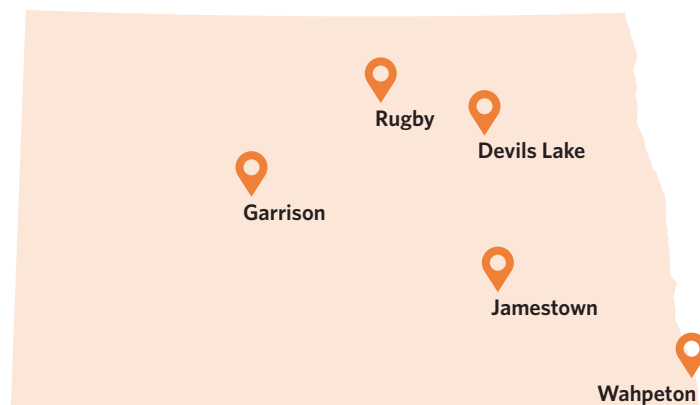
Scam awareness

Scammers have targeted both our residential and business customers by posing as company employees—either in person, over the phone, or online—and demanding immediate payment while falsely threatening to disconnect your electric service. If you receive suspicious contact, ignore it and call us directly at **800-257-4044**. Stay alert and learn more at otpc.com/AvoidScams.

Late payment

If you forget to pay your electric bill or can't pay the amount due by the next billing date, you may be subject to a late payment charge. Customers who make at least 12 consecutive payments prior to the missed payment date won't receive a late payment charge. Unpaid balances of \$5 or more are subject to a late payment charge if the customer has been delinquent more than once during the last 12 months. The delinquent amount for accounts on EMP or payment schedules is the lesser of the outstanding account balance or the outstanding scheduled payments.

Customer Service Centers in North Dakota



Contact any of our Customer Service Centers at **800-257-4044** or **218-739-8877**.

The maximum late payment charge is subject to a 1.5 percent monthly (18 percent annually) late payment charge or \$1, whichever is greater. We'll provide a notice of possible late payment charges on a customer's electric service statement after one missed payment and address a late payment charge during the next billing period. We'll credit all payments against the customer's oldest outstanding account balance before applying any late payment charge.

Any payments returned unpaid by a bank to us are subject to a \$15 return-payment fee.

Disconnection

While we make every effort to contact customers and work with them to avoid disconnecting power, disconnections may be necessary in certain situations such as when electric bills aren't paid.

Before disconnection, we send a notice by first-class mail to the account mailing address. The notice explains the reason for disconnection, gives the date disconnection will take place, outlines the procedure to avoid disconnection, and indicates that a reconnection fee and deposit may apply should we need to disconnect the customer's service.

If you have an existing health condition, are 65 or older, or have a disability, please contact us. We'll work with you to help create a plan before disconnection due to nonpayment.

We may disconnect services for reasons other than nonpayment of electric service.

Some examples of disconnections with notice include:

- Failure to make proper application for service.
- Violation of our company's regulations, which are on file with the North Dakota Public Service Commission.
- Failure to provide us with reasonable access to our company's equipment and property.
- Breach of contract for service between our company and the customer.

Some examples of disconnections without notice include:

- Unauthorized use of or tampering with our company's equipment.
- Conditions determined to be hazardous to the customer, other customers, our equipment, or the public.

Energy use

Your electric meter

We use electric meters to measure the electricity consumption delivered to a home or building. Our meter-testing program exceeds governmental standards to help ensure continuous accurate measurement of electrical use. And we periodically test our meters. In addition to the computer-directed testing program, any customer may request a special meter test. The following rules govern special meter tests:

- If a customer requests a meter test within one year of a previous request, we'll add a charge to the customer's bill if the metering equipment tests accurate. (Meter error is plus or minus less than two percent.)

How to read your bill

A. Return portion

Whether paying by mail or in person, return this stub with your payment. It includes:

1. Optional enrollment to buy Otter Tail Corporation stock. Your statement will reflect the amount you select during enrollment.
2. Optional donation to help provide energy assistance to those in need in North Dakota.
3. Your name and mailing address.
4. The date your payment is due.
5. The amount due for this period.

B. Account status

This portion of your statement brings you up to date on your account. It includes:

6. Your account number.
7. The address where you receive electrical services.
8. The billing date.
9. Previous payment on your account.
10. The address and phone number of the Customer Service Center serving your account.
11. Details regarding Even Monthly Payment.

C. Account detail

This portion of your statement explains your electric use during the billing period. It includes:

12. The type of service for which you're being billed with seasonal rates applied.
13. Your meter readings with dates taken. Upon receiving a new advanced meter, your bill will display the billing period as shown in the call out below.
14. Total kilowatt hours used for each type of service.
15. Details of charges, including the rates used to calculate your billing.
16. Fuel and Purchased Power includes the cost of fuel we use to generate electricity to serve our retail customers, transportation costs for that fuel, and costs we incur to buy energy to supplement our own power plants.

Customers with a new advanced meter will receive bills displaying the billing period.

**Account Detail (1234567)
01.Residential Serv Winter**

EP Billing Period:	01/13/23 - 02/08/23
Kilowatt Hours Used	2115
Max Demand	5.6
Customer Charge (20.10 x 12/365) x 26	17.18
5.6 kW at 8.00	44.98
2115 kWh at .03461	73.20
Fuel and Purchased Power 2115 kWh at .02543	53.78
Total:	189.14

17. The Transmission Cost Recovery Rider allows us to recover costs associated with transmission additions designed to meet our customers' energy needs, accommodate the delivery of additional renewable energy, and enhance transmission system reliability.
18. The Renewable Resource Adjustment Rider allows us to recover costs associated with renewable energy facilities that we own.
19. The Generation Cost Recovery Rider allows us to recover costs associated with new generation facilities to provide additional capacity, dispatchable energy, and grid support to meet our customers' electric needs.
20. The Advanced Meter and Distribution Technology Rider allows us to recover costs associated with advanced metering, outage management, and demand response projects.

Status of Your Account

Account Number: 1234567
 MARY CUSTOMER
 123 ANYWHERE ST
 ANY TOWN, ND 12345-6789
 Billing Date: Feb 13, 2023

Amount Due: \$256.00

Account Detail (1234567)

01.Residential Serv Winter	189.14	02.Other Charges/Credits	29.48
EP 02/08/23 Reading	74240	Transmission Rider	3.66
01/13/23 Reading	72125	Adv Meter & Dist Tech	9.62
Kilowatt Hours Used	2115	Renewable Rider	4.04
Max Demand	5.6	Generation Rider	
Customer Charge (20.10 x 12/365) x 26	17.18		
5.6 kW at 8.00	44.98		
2115 kWh at .03461	73.20		
Fuel and Purchased Power 2115 kWh at .02543	53.78		
Total:(01)	189.14	Total:(02)	29.48
		Current Billing:	218.62

Important information on the back too!

Look on the back of your statement for a graph depicting your electricity use during the last 25 months, space to report an address change, information explaining how you may pay by credit card, and other special messages.