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September 30, 2025

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 Updated Meter Testing Plan and Application for Approval to Extend Suspension of the Sample Meter Test Performance Report
Case No. PU-25-
Initial Filing**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail Power) hereby submits to the North Dakota Public Service Commission (Commission) its updated meter testing plan in the above-referenced matter. Otter Tail Power would also like to request an extension of the waiver previously granted under Case No. PU-21-416, which suspended the requirement to submit the sample meter test performance report for the years 2022 through 2025.

As outlined in our original waiver request (Case No. PU-21-416), this suspension was necessary to accommodate the deployment of Advanced Metering Infrastructure (AMI). While significant progress has been made, the AMI deployment has extended beyond our initial timeline and has carried over into 2025.

To ensure the integrity of our meter testing plan and to align with the completion of AMI deployment, we respectfully request that the Commission extend the suspension of the sample meter test performance report through 2026, with reinstatement of sample testing and reporting beginning in 2027.

Enclosed with this letter is our revised meter testing plan, which outlines the structured methodology employed by Otter Tail Power to ensure the ongoing accuracy of our meter fleet. This process incorporates advanced test equipment and adheres consistently to industry standards to validate meter performance. Enhanced visibility through our AMI system allows us to detect meter anomalies more effectively and respond to them with greater efficiency. The solution as a whole provides a more consistent and accurate metering fleet.

Copies have been sent to you via USPS.

1 PU-25-266 Filed 09/30/2025 Pages: 4
Application for Approval to Extend Suspension of the Sample
Meter Test Performance Report

Otter Tail Power Company
Annalise Smith, Supervisor, Load Research

Mr. Kahl
September 30, 2025
Page 2

Please contact me at (218) 739-8401 or asmith@otpc.com if you have any questions regarding this filing.

Sincerely,

/S/ ANNALISE SMITH

Annalise Smith
Supervisor, Load Res & Cust Data
Regulatory Economics

amn
Enclosures
By electronic filing and U.S. mail

Otter Tail Power Company Testing Plan for Revenue Meters

All Revenue Meter testing is conducted at the Otter Tail Power Energy Measurement and Control Shop, Fergus Falls, MN, unless otherwise noted. These programs help maintain the accuracy and reliability of the metering systems, which is crucial for the proper billing of energy usage and the overall efficiency of the power distribution network.

As required by North Dakota Rule 69-09-02-28, Meter Records.

Testing Standards

Standard for Meter accuracy

ANSI C12.20

Standard for Sample Test groups and failure limits

ANSI standard Z1.9 – Table A-2 (sample groups)

Table A-2 and tested to verify accuracy and functionality.

ANSI Z1.9 – Table B-3 (failure limits)

- Inspection Level IV, Acceptable Quality Level of 0.65%,
- Upper Specification Limit of 101.0%
- Lower Specification Limit of 99.0%

Testing Conditions:

New self-contained revenue meters:

When a shipment of new self-contained kWh meters is received, a random sample of meters is selected from each lot.

If the sample fails, then the entire shipment of meters is tested or rejected and sent back to supplier.

For all tested meters, test data and results are documented and maintained for each meter in accordance with regulatory requirements. Any meter lot found to be outside approved tolerance levels are rejected and sent back to the manufacturer.

New instrument transformer rated meters and meter installations:

When a shipment of instrument rated revenue meters is received, a random sample of meters is selected from each lot.

If the sample fails, then the entire shipment of meters is tested or rejected and sent back to supplier.

For all tested meters, test data and results are documented and maintained for each meter in accordance with regulatory requirements. Any meter lot found to be outside approved tolerance levels are rejected and sent back to the manufacturer.

In-service self-contained meters:

In-service single-phase and three-phase self-contained meters are random sample tested by group. Groups for random sample testing are chosen using attributes of age and various models by Manufacturer.

If a group sample fails, then a second larger sample will be taken; if this fails, then all meters in that group will be removed from service for testing and calibration as needed, or retired, within five years.

For all tested meters, test data and results are documented and maintained for each meter in accordance with regulatory requirements. Any meter lot found to be outside approved tolerance levels will be retired or, if still under warranty, sent back to the manufacturer. The meter that was in-service will be reconditioned or retired.

In-service instrument transformer rated meters and meter installations:

In-service instrument transformer rated meters are tested on a schedule that is based on annual kWh consumption. Meters on the test schedule are either tested at the customer premises or replaced with a new I reconditioned meter. Meters are calibrated if test results show an error beyond $\pm 0.2\%$. After a meter is placed in service, the meter installation is tested.

Annual kWh Consumption	Test Schedule
2,000,000 and above	1 year
170,000 to 2,000,000	6 years
25,000 to 170,000	12 years
Less than 25,000	16 years

Instrument transformer rated meter installation test:

Instrument transformer rated meter installations are tested at the customer premises with a phase angle meter, ammeter, and voltmeter to ensure proper connections were made by the installer. If the current transformers or potential transformers are replaced, this procedure is repeated.

Reconditioned meters:

Reconditioned meters are tested before installation. If test results show an error beyond $\pm 0.2\%$, meters are retired.