

Meter Testing Rule Waiver Extension

Otter Tail Power Company
CASE No. PU-25-266

December 17, 2025



OTTER TAIL PARTICIPANTS

- Ben Christenson – Advanced Concepts Project Engineer
- Amber Grenier – Manager Regulatory Economics
- Annalise Smith – Supervisor Load Research & Customer Data Analysis

AGENDA

- AMI Update
- Proposed Waiver Extension
- Maintaining Meter Integrity During Suspension
- Summary of Request

AMI UPDATE

- AMI Project closing the end of 2025
- 173,200 AMI installed (99.5%)
 - February 2024
 - December 2025
- 1,000 non-AMI meters
 - 275 path for exchange in 2026
 - 725 Unique installs
 - AMI platform maturity
 - Substation metering – no plan to move

SUMMARY OF REQUEST

- Otter Tail is requesting to suspend sample meter testing of installed meters thru 2026.
- Sample meter testing would be reinstated in 2027.
- Otter Tail will submit a proposed meter testing plan by end of Q3 2026 regarding 2027 testing.
- OTP delayed installation 18 months
 - Deployment expected to begin in 2022.
 - Started February 2024
 - Completed December 2025
- Avoid exchanging meters that have just been installed.
 - Reduce operational costs

TESTING THAT WILL REMAIN ACTIVE DURING SUSPENSION EXTENSION

- Customer complaint testing and high/low bill analysis.
- Customers with greatest exposure.
- Anomalies identified through the integrated AMI Solution
 - CIS
 - AMI HE
 - MDMS
 - Analytical tools designed to detect anomalies
- Any meter removed from service with the intent of being reinstalled will be tested for accuracy prior to installation.

TESTING FOR NEW AMI METERS

- New Meter Testing
 - Must meet the ANSI standard (.2%)
 - Every meter received is tested at the factory
 - Sample tested at OTP

CLOSING SUMMARY OF OTTER TAIL REQUEST

In this Case, Otter Tail requests Commission approve a request to temporarily suspend sample meter testing.



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