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June 6, 2014

Tammy Pust  
Chief Judge and CEUD Workgroup Facilitator  
Minnesota Office of Administrative Hearings  
600 N. Robert Street  
St. Paul, MN 55164

RE: CEUD Workgroup – Informal Comments due June 6, 2014  
DOCKET NO. E,G999/CI-12-1344

Dear Judge Pust:

Otter Tail Power Company (“Otter Tail”) has been an observer to the Customer Energy Usage Data (“CEUD”) Workgroup. As an observer we have attended all the meetings in person or by teleconference but we have not directly commented on the issues. We greatly appreciate the effort made by the Workgroup’s active participants to frame and work through the issues. We offer the following very brief comments to confirm Otter Tail’s general concurrence with other electric utilities on a few key points.

We agree with the position noted by others that nondisclosure of specific customer CEUD should be the default rule, with exceptions for disclosures by customer consent, disclosures required by law, and disclosures necessary to provide service. We agree that where customer consent is available to third parties seeking CEUD such consent should normally be secured by the third party. With respect to disclosures of aggregated CEUD in support of public policy, we generally support the Workgroup’s recommendation concerning a risk mitigation study to identify statistical valid levels of aggregation. Absent such an analysis we are not in a position to endorse any particular level of aggregation.

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We share concerns raised by Minnesota Power and others regarding large industrial customers. While our customer mix differs from that of Minnesota Power, we too have industrial loads in thinly populated areas where effective aggregation and anonymization may be difficult. We think it is reasonable to recognize a mechanism by which large industrial customers can ensure the confidentiality of their usage data.

In terms of data availability, Otter Tail's position in the Use Matrix is most closely aligned with Minnesota Valley Electric's information. Overall there isn't a significant difference between Otter Tail and the other utilities noted in the Use Matrix.

We share the concerns voiced by the other utilities about the costs associated with collection, aggregation and reporting of CEUD outside of or beyond current practices. While those costs can't be quantified at this time, it seems clear that costs could be considerable in terms of employee staffing, information technology upgrades, and operational changes. Otter Tail, like other smaller utilities, is especially sensitive to costs associated with substantial information technology upgrades. As noted by others, there should be a cost recovery mechanism for increased operational and capital expenses driven by state CEUD policy.

Finally, we believe the record developed by the Workgroup reflects the fact that Minnesota utilities vary greatly in scope, organization, and operations. We believe it is appropriate for the Commission to consider those differences in developing CEUD policies.

Respectfully Submitted,

/S/

Cary Stephenson  
Associate General Counsel