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March 27, 2020

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85 7<sup>th</sup> Place East, Suite 280  
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**RE: Otter Tail Power Company COVID-19 Response Measures  
Update and Reply to Letter  
Docket No. E,G999/CI-20-375**

Mr. Seuffert and Ms. Burdette:

I am writing in response to the March 25, 2020 letter from Chair Sieben and Commissioner Kelley in the above referenced docket. Otter Tail is committed to the actions outlined. Specifically, we have suspended disconnections and will work to reconnect customers who have been disconnected for the duration of the national security or peacetime emergency; we have already begun to waive late fees and we will continue to do so along with working with customers to establish payment plans that account for the current circumstances.

Our company is also positioned to comply with Governor Walz's Emergency Executive Order 20-20 Directing Minnesotans to Stay at Home. While many of our functions directly support the Critical Sector work of providing energy to our customers, we have adopted remote work practices and implemented social distancing to the maximum extent possible.

I am also taking this opportunity to give the Commission and the Department an update on Otter Tail's operational responses to the Covid-19 pandemic. I am giving you this information to position you as well as possible to respond to things as they may evolve. Going forward, I will give you periodic updates as things may change.

Our actions have been targeted at keeping our employees and the public safe and maintaining reliable electric service to our customers, who depend on us to do so especially when other things in their lives are uncertain. I am proud of how my coworkers have stepped up to prepare and respond. In many cases, if not most, this effort has required flexibility and personal sacrifice from them. I know the same is true for you all at the Commission and the Department.

Below are operational plans we're enacting to help protect our employees and the customers and communities we serve. Please give me a call any time if you have questions (218) 205-6851.

## **I. Plans for continuity of operations in our control room and generation facilities including maintaining the health of key personnel.**

### **A. System Operations (Transmission)**

- We closed our Primary Control Center to all non-essential personnel. We are not allowing contractors or cleaning crews in the physical security perimeters (PSPs).
- We have a dedicated entrance/exit into the building for the Power System Operators (Operators).
- Shift crews are maintaining separation between workspaces.
- All operations support personnel and supervisors, with minimal exceptions, are working from home.
- Operators scheduled for their typical training weeks, or non-shift weeks, are not reporting into the control center.
- Operators are cleaning workstations at every shift change.
- We have determined what minimum staffing will look like under extreme emergency conditions.
- Employees are no longer traveling for work outside our service area—and they are limiting all other work-related and personal travel.
- All employees must report to their supervisors if they may have been exposed to illnesses or are not feeling well.
- We are communicating among all neighboring control centers, and MISO, to ensure we are well aware of what each other is doing.

### **B. IT Operations**

The following provides steps implemented by the Network Engineering, System Specialist, End User Support, and Information Center departments to continue supporting critical infrastructure within the current situation and to support future distancing strategies.

IT Operations Departments Top Priority:

- Safety always
- Operational support of critical infrastructure

#### Employee Resource Allocations:

- The Network Engineering teams have been identified as critical offsite employees and have been working remotely as of March 17, 2020.
- Electronic Technicians have been identified as critical onsite employees and remain working within their typical onsite workspace.
- The Information Center help desk team is working remotely.

#### Operational Support:

- Intake issues are filtering through the Information Center.
  - Information Center employees will continue to receive calls from their home offices.
  - Ticket prioritization will be exercised.
  - Ticket assignments will be distributed electronically throughout the support teams.
- We are using technology for internal and external collaboration.
- Help desk staff are using technology to stay connected on incoming tickets and issues that arise so we can quickly react.
- We have limited IT staff onsite delivering required hardware for new and critical employees.
- IT supervisors are available for support between 5 p.m. and 7 a.m. when the help desk staff is not available.

#### Remote Support:

- We are providing our employees with “best practice” documents for working remotely, including instructions on how to use technology for teleconferencing/collaboration needs.
- We are continually updating an employee FAQ document as a quick reference guide on issues they may be experiencing remotely.
- We are providing employees with alternate ways of doing their daily tasks while still maintaining our security posture.

#### Monitoring/Alarming:

- All Network Engineering resources have capability to monitor alarms impacting communications to critical infrastructure.
- System Operations will continue to follow Standard Operating Procedures for dispatching team resources.
- Network availability and capacity are being monitored for operational impacts.

#### Cyber Security:

- We continue to monitor alerts.
- We continue to proactively review Industry cyber security bulletins for utility impacts and mitigate risk where applicable.

#### Resilience Planning

- We continue to enhance open communications with other utilities, telecommunications technical support, and engineering teams, to ensure shared transport network resources and services continue to be supported and dispatched with priority based on impact.
- We are identifying additional IT staff members that can be available to triage tickets in the event current staff can't handle volume and resolve issues in a timely fashion.
- Our help desk staff are rotating in our call queue so individuals can get away from the desk to avoid work fatigue etc. given the situation.
- We have established point-of-contact and back-up employees for all IT functions.

#### **C. Customer Service, including field operations (distribution), employee resource allocation:**

- Employees are reporting to duty and managing their workdays *outside* of shared workspaces. This includes office-related work in remote areas whenever possible. Customer Service Representatives are operating remotely.
- We are not allowing multiple individuals to travel in a single company vehicle unless it is absolutely unavoidable. We have provided additional vehicles where available, and employees are allowed to transport in their own vehicles if necessary.
- Non-essential travel and interaction between Customer Service Centers and regional workgroups has been limited.
- We continue to perform meter reading with the exception of meters located inside residences and businesses. These meter readings will be estimated as necessary.
- We have worked with a Meter Reading contractor on preparations and plans to maintain operations.
- Field personnel are split into five Customer Service areas—several operating in locations in which they are the only employees in the communities. So, the field group is generally properly dis-aggregated. Employees will not meet in-person with crews and Operations Managers from other areas, unless emergency restoration requires it.
- We are using remote meeting technology rather than in-person meetings.
- Office staff employees have either been sent home to work when available. Office staff is generally dis-aggregated, which helps maintain the ability to meet customer needs.
- We are working with other employees that can fill Customer Service Representative responsibilities.

#### **D. Energy Supply (Generation)**

- All control rooms are “locked-down” with only essential personnel present.
- Big Stone and Coyote have moved to “conservative operations” which provides that:

- Office staff is working remotely. Management is in frequent contact through phone and electronic means with the control rooms and are making scheduled physical visits to the plant.
- Maintenance (mechanical and electrical) crews are at home with daily call-in assignments each morning to minimize the volume of employees in the facility.
- Operators continue to rotate on the normal shift schedule.
- Cots and food supplies are on-site at the plant if we need to sequester Operators in place.
- All gas and oil units are available and ready for service. These units can all be operated remotely.
- Construction work continues on-site for both Astoria and Merricourt. The new natural gas turbine was delivered on-site on Thursday, March 19. Only minor construction activities are underway at Merricourt until mid-May when turbine and tower delivery/erection will commence. Coordination with on-site contractors is occurring to ensure optimal social distancing and personal hygiene.
- All plants or functional areas are conducting virtual meetings daily.

## **II. Plans for maintaining critical supplies including fuel.**

- We have been in contact with the railroads, mines, and reagent suppliers, and at this time there is no indication of supply disruption.
- Wind resources are operating normally.
- All market-function employees are working remotely. Interaction with plants, required software, and MISO is working well.

## **III. Steps taken to coordinate with state and local emergency operations.**

- Through our normal business operations— outage restoration, emergency response, public safety – we have routine contact with local law enforcement throughout our service territory. Our contact list, which was recently updated, includes direct emergency contact information for all counties within our service territory.
- At our headquarters in Fergus Falls, we have direct contact and have coordinated with the Director of Public Safety for the City of Fergus Falls.
- We are interested in open communication and collaboration with state agencies.

## **IV. Plans to ensure the health of essential employees and steps currently being taken to prevent the spread of disease with field staff making customer service calls.**

#### **A. Field staff**

- Otter Tail will estimate meters for up to the next three months for any meter that is inside an inhabited structure, or for which Otter Tail personnel deem an estimated reading to be reasonably required under the existing circumstances. This will reduce personal interactions and respect customers who are isolating or distancing themselves and enhance the safety of Otter Tail personnel and our customers.

#### **B. All employee and work locations**

- We are requiring all workers that can work from home to do so.
- We are emphasizing proper cleanliness techniques for personal hygiene and the work environment.
- Employees are cleaning their own workstations periodically throughout the workday.
- We are practicing social distancing. We are encouraging our Operators in-home sequester when not at work.
- If in-person meetings are necessary, we allow a limited number of participants and adhere to social distancing.
- We are discouraging use of other worker's phones, desks, offices, and other work tools and equipment.
- We have a daily illness reporting tool in place, along with a process to determine when employees are cleared to work.

Otter Tail has implemented a process to determine whether employees are allowed to return to work after travel, whether work-related or personal. We implemented a 14-day wait period for employees who have recently travelled via airplane, whether foreign or domestic; traveled to a Level 3 country or hot spot in the United States; been on a cruise; or have exhibited potential symptoms of COVID-19 or been in contact with anyone who exhibited symptoms of COVID-19.

- We have established quarantine areas at each facility.
- We have restricted entrance to all Company facilities to employees and essential contractors.
- We have increased cleaning at all Company facilities.
- We deliver daily communications to all employees, providing updates on safety items, operational changes, and information about how we can stay healthy and help stop the spread of COVID-19.
- We have hung prevention posters from the Center for Disease Controls in our facilities.
- We continue to monitor and update plans as necessary and appropriate as we learn more.

The plans outlined above address the current approach to the situation as we know it today. This situation is evolving quickly. We will adapt our plans to circumstances as they change.

There may be instances where we may request exceptions from regulations and Commission Orders to effectively operate and safely serve customers. The North American Electric Reliability

Corporation (NERC) for instance, has relaxed training and certification compliance standards and other standards where compliance efforts may be affected by safe practices related to COVID-19.

Otter Tail appreciates the Commission, the Department, and other utilities working together as we navigate this challenge.

Otter Tail has electronically filed this document with the Commission. Please contact me at (218) 205-6851, or [bgerhardson@otpc.com](mailto:bgerhardson@otpc.com), should you have any questions.

Sincerely,

*/s/ BRUCE GERHARDSON*  
Bruce Gerhardson  
Vice President, Regulatory Affairs

cjh  
By electronic filing  
c: Service List

## CERTIFICATE OF SERVICE

**RE: Otter Tail Power Company COVID-19 Response Measures  
Update and Reply to Letter  
Docket No. E,G999/CI-20-375**

I, Carly Haiby, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert, Jessica Burdette and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company**

Dated this 27<sup>th</sup> day of March, 2020

/s/ CARLY HAIBY

Carly Haiby, Regulatory Filings Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
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(218) 739-8472

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-375_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_20-375_Official
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-375_Official
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-375_Official