215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)

April 1, 2016

Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

RE: In the Matter of Otter Tail Power Company 2015 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2016
Docket No. E017/M-16-___

Dear Mr. Wolf:

Otter Tail Power Company ("Otter Tail") submits the enclosed Annual Report pursuant to Minn. Rules 7826.0400, 7826.0500, and 7826.1300. This Annual Report presents our safety, reliability, and service quality performance for the year 2015 and proposed reliability standards for 2016 pursuant to Minn. R. 7826.0600. Otter Tail's proposed reliability standards for 2016 are found in Table 1 in Section IV, of the attached 2015 Report and Proposed 2016 Reliability Standards Petition.

Otter Tail has electronically filed this document with the Commission. In compliance with Minn. Rule 7829.1300, subp. 2, Otter Tail is serving a copy of this filing on the Department of Commerce – Division of Energy Resources and Office of Attorney General – Antitrust & Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's general service list. A Certificate of Service is also enclosed.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8395 or email me at jfyhrie@otpco.com.

Sincerely,

/s/ JESSICA FYHRIE
Jessica Fyhrie
Supervisor, Regulatory Proceedings

JF:nlo
Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's 2015 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2016	Docket No. E017/M-16-_____

2015 REPORT AND PROPOSED 2016 RELIABILITY STANDARDS

Summary of Filing

Please take notice that on April 1, 2016, Otter Tail Power Company ("Otter Tail" or "the Company"), filed with the Minnesota Public Utilities Commission ("Commission") its annual Safety, Reliability and Service Quality Report for 2015 pursuant to Minnesota Rules 7826.0400, 7826.0500 and 7826.1300. Pursuant to Minnesota Rule 7826.0600, subp. 1, Otter Tail proposes SAIFI, SAIDI and CAIDI reliability standards for 2016.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's 2015 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Standards for 2016	Docket No. E017/M-16-_____

2015 REPORT AND PROPOSED 2016 RELIABILITY STANDARDS

I. INTRODUCTION

Otter Tail Power Company ("Otter Tail" or "the Company"), submits this filing in compliance of Minnesota Rules 7826.0400, 7826.0500, 7826.0600, subp. 1, and 7826.1300.

II. GENERAL FILING INFORMATION

Pursuant to Minnesota Rule 7829.1300, subp. 4, Otter Tail provides the following general information.

A. Name, Address, and Telephone Number of Utility

Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8200

B. Name, Address, and Telephone Number of Utility Attorney

Bruce Gerhardson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8475

C. Date of Filing and Effective Date

This Report is being filed on April 1, 2016. The proposed reliability standards will be effective for the calendar year 2016.

D. Title of Utility Employee Responsible for Filing

Jessica Fyhrie
Supervisor, Regulatory Proceedings
Otter Tail Power Company
215 South Cascade Street
P. O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8395

III. MISCELLANEOUS INFORMATION

A. Service on Other Parties

Pursuant to Minn. Rule 7829.1300, subp. 2 and Minn., Stat. §216.17, subd. 3, Otter Tail has electronically filed this Report and Proposed 2016 Reliability Standards. A summary of the filing has been served on all parties on the attached service list.

B. Summary of Filing

A one-paragraph summary of the Report is attached pursuant to Minnesota Rule 7829.1300, subp. 1.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Annual Reporting

Minnesota Commission Rules 7826.0400, 7826.0500 and 7826.1300 require electric utilities to file reports on safety, reliability, and service quality performance for the prior year. Otter Tail's 2015 Safety, Reliability, and Service Quality Report is attached.

B. Proposed reliability standards for 2016

Minnesota Commission Rules 7826.0600 subp. 1, requires electric utilities to propose reliability performance standards for each of its work centers. The rule requires the performance

standards be filed on or before April 1 of each year. The utility is to propose standards for the following reliability indices:

1. System average interruption duration index or SAIDI
2. System average interruption frequency index or SAIFI
3. Customer average interruption duration index or CAIDI

In compliance with the Commission Rules 7826.0600 Subpart 1, Otter Tail's proposed 2016 reliability performance standards for each of Otter Tail's work centers. As ordered in **Docket No. E017/M-15-322 dated August 14, 2015**, Otter Tail's reliability standards have been frozen at 2013 levels until the Company has shown sufficient improvement in indices' performance. Although OTP has improved over the last two years, we propose maintaining the performance standards at the 2013 levels as shown in **Table 1** below.

Table 1

Proposed 2016 Standards by CSC			
Work Center	**SAIDI**	**SAIFI**	**CAIDI**
Bemidji	70.64	1.26	56.06
Crookston	69.33	1.19	58.26
Fergus Falls	66.97	1.11	60.33
Milbank	75.49	1.82	41.48
Morris	55.78	1.01	55.23
Wahpeton	57.24	1.13	50.65
All MN Customers	**64.95**	**1.13**	**57.48**

V. CONCLUSION

Otter Tail hereby submits its annual Safety, Reliability, and Service Quality Report for 2015, proposed reliability standards for 2016.

Date: April 1, 2016

Respectfully submitted,

By: /s/ JESSICA FYHRIE

Jessica Fyhrie
Supervisor, Regulatory Proceedings
Otter Tail Power Company
215 South Cascade St., PO Box 496
Fergus Falls, MN 56537
(218) 739-8395

BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Docket No. E017/M-16-____

Otter Tail Power Company's
Safety, Reliability, and Service Quality
Report for 2015,
and
Proposed SAIFI, SAIDI, and CAIDI
Reliability Standards for 2016,

Including Additional Information Required
by Commission Orders

April 1, 2016

TABLE OF CONTENTS

I. OTTER TAIL EXECUTIVE MANAGEMENT'S VIEW OF RELIABILITY

This section provides the view of Otter Tail's executive management towards reliability and customer satisfaction.

Management's view of reliability at Otter Tail Power Company (Otter Tail) continues to be best summarized in the Company's mission statement:

"To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business."

The integrity of Otter Tail's entire transmission and distribution system is directly related to interruption frequency; thus, the accountability lies within our Asset Management area. Otter Tail's Asset Management area is accountable for the quality, availability and delivery of materials and engineering associated with providing electric service to Otter Tail customers. At Otter Tail, we employ a system of Key Performance Indicators (KPIs), for the purpose of providing additional focus on achievement in particular areas of our operations. Two of Asset Management's KPIs are reliability indices dealing with interruption frequency: the Momentary Average Interruption Frequency Index (MAIFI) and System Average Interruption Frequency Index (SAIFI).

Otter Tail's Customer Service area is accountable for responding to all interruptions. Thus, Otter Tail's Customer Service area is accountable for the cost effective and efficient deployment of field personnel, trucks, and equipment as quickly and safely as possible, necessary for restoring service to customers when interruptions occur. One of the Customer Service area's KPIs is Customer Average Interruption Duration Index (CAIDI.) Additionally, the Reliability indices, SAIDI, SAIFI, CAIDI, and MAIFI are companywide KPI's. These indices are communicated and reviewed with all employees, on a monthly basis, with the expectation that all employees remain cognizant of our company's reliability performance.

The Asset Management and Customer Service areas have a common goal, which is to improve the overall system reliability. Each area recognizes the overall system improvement cannot be accomplished without collaboratively working with the other area. Each area also recognizes system reliability improvements are based on cost effective decisions and overall system improvements over longer periods of time.

Customer experience (including service reliability) and satisfaction are among top priorities for our company. J.D. Power announced that Otter Tail Power Company ranked highest in customer satisfaction among midsize utilities in the Midwest in its 2015 Electric Utility Residential Customer Satisfaction Study ^{SM} in a tie. In many industries, including ours, J.D. Power awards are symbols of trust and excellence. This J.D. Power study measured customers' satisfaction with their electric utility companies by looking at six factors: power quality and reliability, price, billing and payment, corporate citizenship, communications, and customer service. Customer satisfaction was calculated on a 1,000-point scale and averaged 668 in 2015; Otter Tail Power Company scored 694. The 2015 study was based on responses from 102,525 online interviews ranking 18 providers in the Midwest midsize segment. In addition to Minnesota, the Midwest

geographical area in this study includes Arkansas, Iowa, Illinois, Indiana, Kansas, Kentucky, Michigan, Missouri, Nebraska, North Dakota, Ohio, Oklahoma, South Dakota, and Wisconsin. Proprietary study results were based on experiences and perceptions of consumers surveyed in July 2014-May 2015.

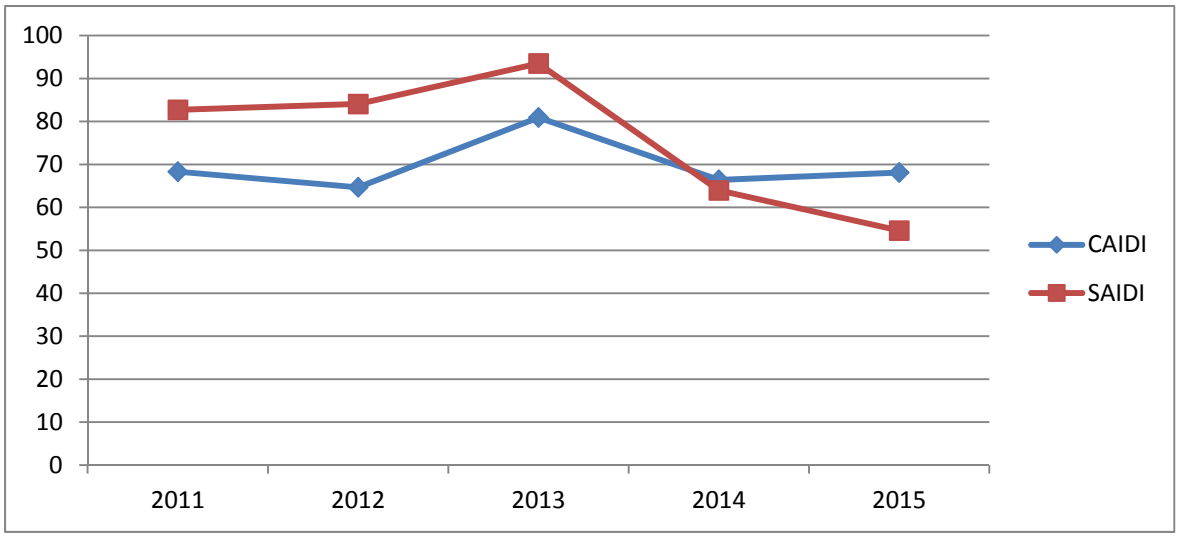
Additionally, Otter Tail was the highest scoring utility among electric and gas-electric investor-owned utilities measured by the American Customer Satisfaction Index in 2015 with an overall customer satisfaction score of 82 (out of 100). The reliability portion of the survey indicated a score of 90 compared to other investor-owned utilities score of 81.

Otter Tail provides electricity to 423 communities and to rural areas in western Minnesota, northeastern South Dakota, and the eastern two-thirds of North Dakota. The average population of the communities we serve is approximately 400, and over one-half of the communities we serve have populations of fewer than 200. Only three of our communities have populations exceeding 10,000: Fergus Falls, Minnesota (pop. 13,138), Bemidji, Minnesota (pop. 13,431), and Jamestown, North Dakota (pop. 15,427). We operate 10 Customer Service Centers ("CSC") throughout our service territory. Otter Tail is committed to utilizing proactive efforts to communicate, investigate, and resolve reliability issues across our approximately 70,000 square mile service territory. This is roughly the size of North Dakota (70,704 square miles).

II. OTTER TAIL 2015 SUMMARY GRAPHS

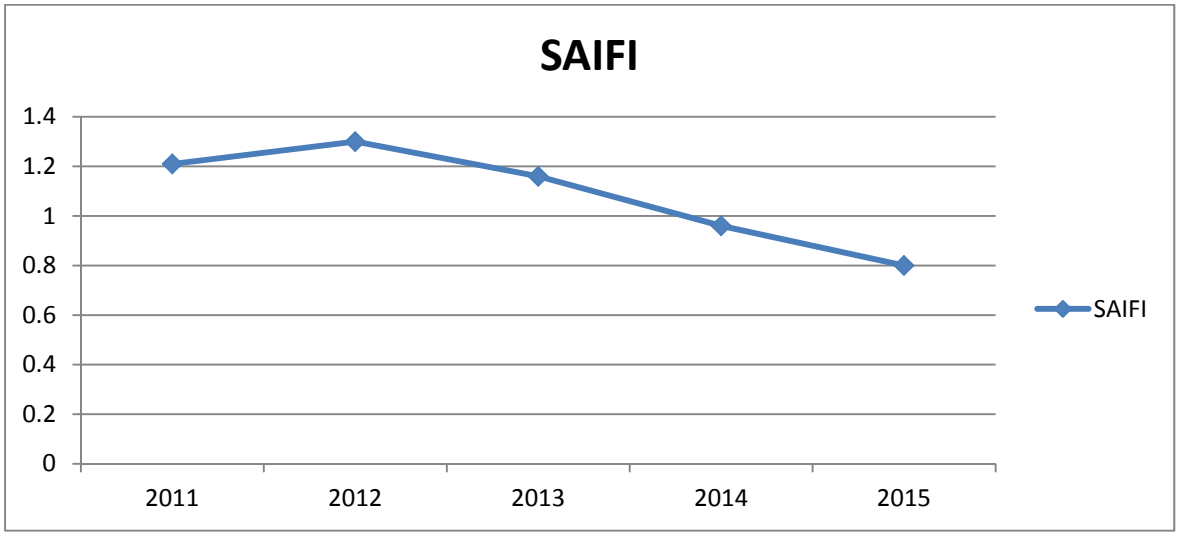
As previously included Otter Tail provides a summary table that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability. Figure 1 through **Figure 6** below provides a brief summary of Otter Tail's overall reliability and service quality for the years 2011 through 2015.

Figure 1 - Historic Minnesota SAIDI and CAIDI



Otter Tail Power MN Customers saw improvement in SAIDI and consistent CAIDI for 2015 when compared to 2014 results.

Figure 2 - Minnesota Historic SAIFI



Otter Tail Power MN Customers continue to see improvements in SAIFI for 2015.

Figure 3 –Historic Expense of Major Critical System Infrastructure Items

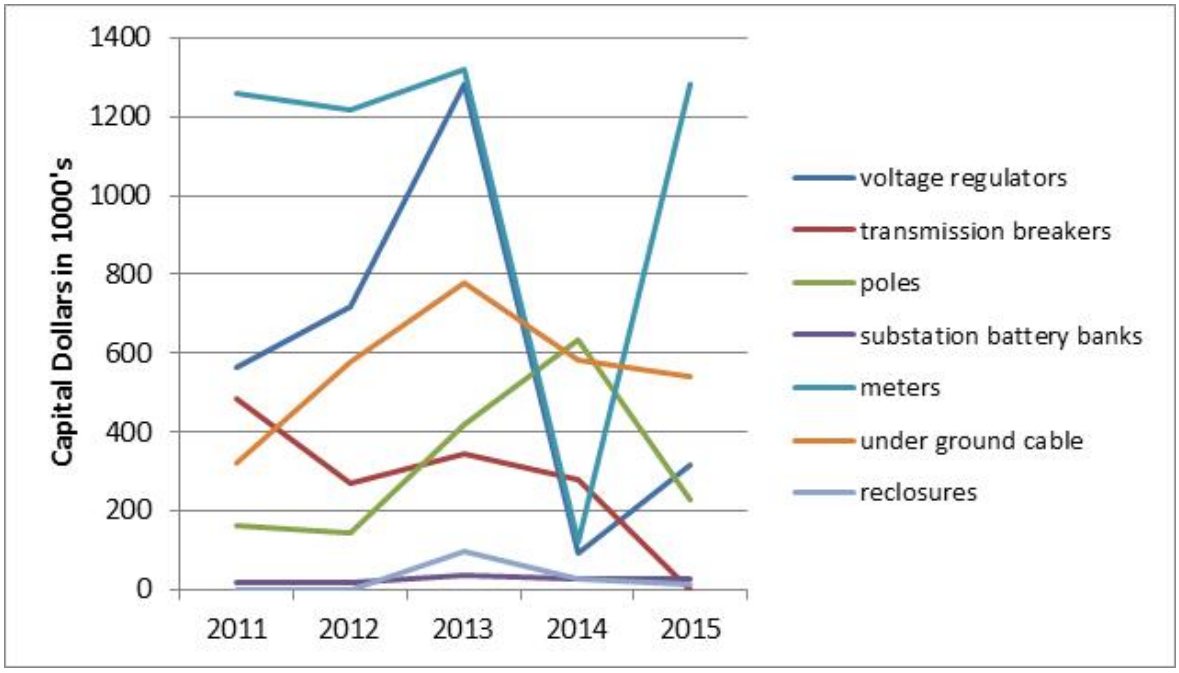


Figure 4 – Minnesota Historic MAIFI

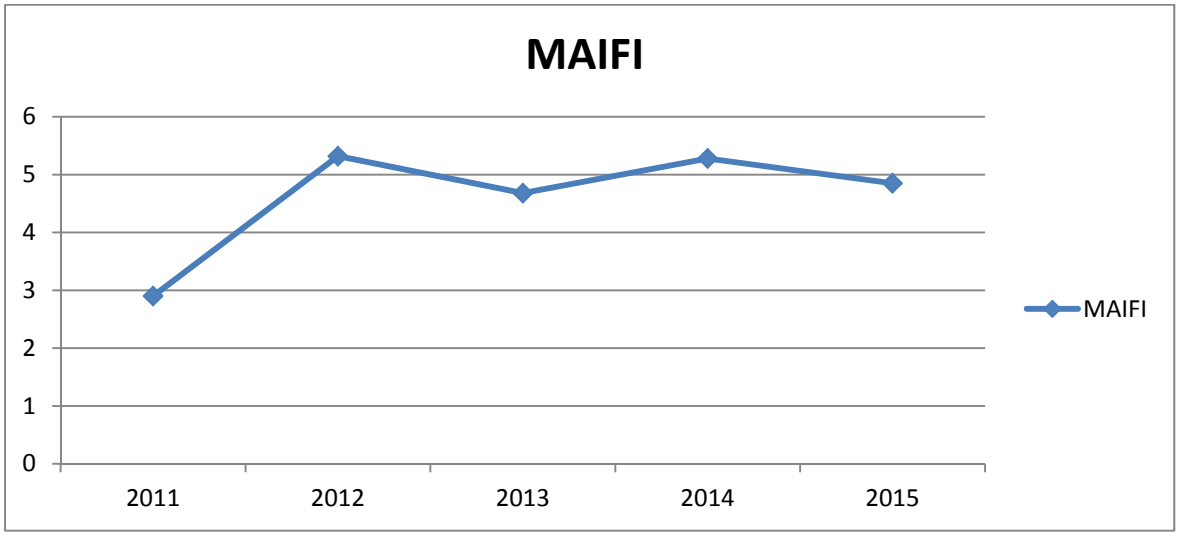


Table 1
MAIFI by Customer Service Center

CSC 2015	MAIFI
Bemidji	3.2
Crookston	6.8
Fergus Falls	4.4
Milbank	11.9
Morris	4.3
Wahpeton	19.7
MN Total	4.9

Figure 5 – Full Time Lineworkers available for trouble and for the operation and maintenance of Minnesota distribution lines

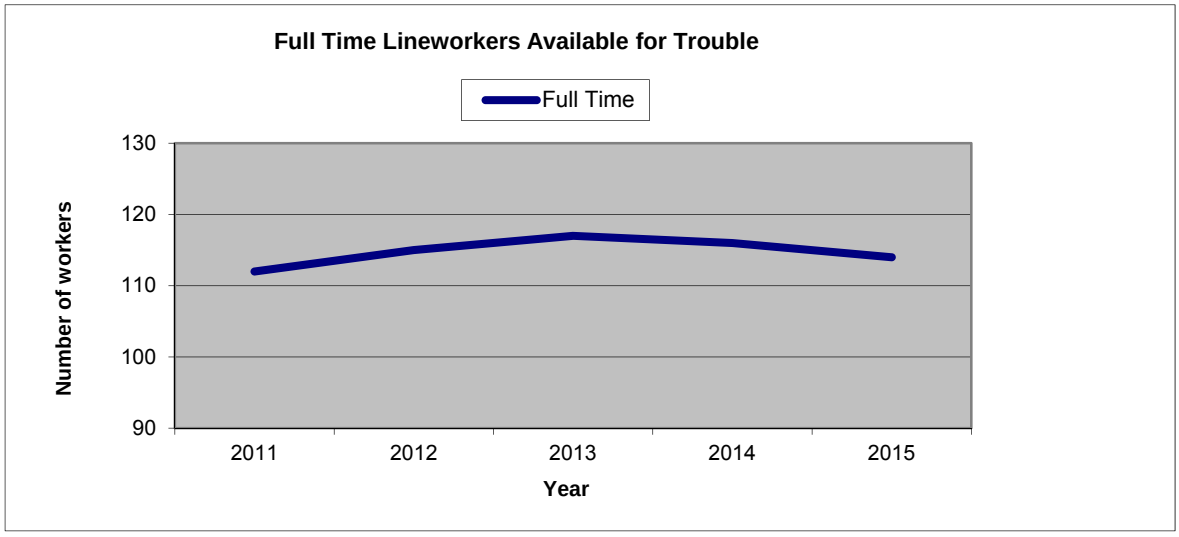
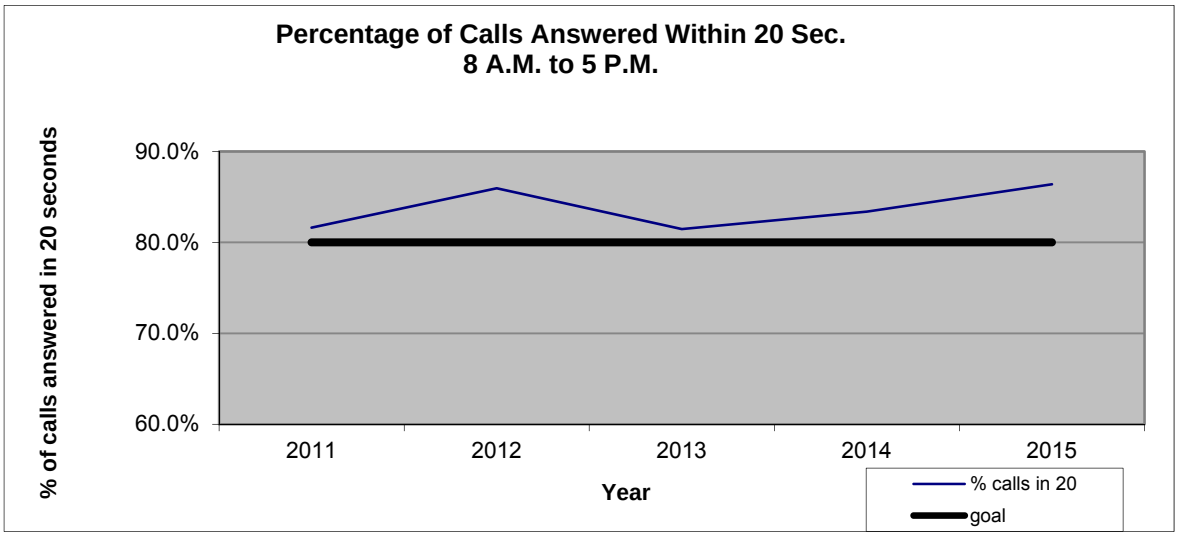


Figure 6 - Calls Answered within 20 Seconds



III. ANNUAL SAFETY REPORT 7826.0400

Pursuant to Minnesota Rule 7826.0400, ANNUAL SAFETY REPORT, each utility shall file a report on its safety performance during the last calendar year. This report shall include the following information.

A. Summary of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the 2015 Calendar year.

Table 2

NUMBER OF CASES			
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases
0	3	7	17
NUMBER OF DAYS			
Total number of days of job transfer or restriction		Total number of days away from work	
349		90	

INJURY AND ILLNESS TYPES				
Injuries	Skin disorders	Respiratory conditions	Poisonings	All other illnesses
23	0	0	0	1

B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electric system failures and all remedial action taken as a result of any injuries or property damage described.

Table 3

ANNUAL SAFETY REPORT				
Date	**Cause**	**Type**	**Action Taken**	**Expense**
8/14/2015	Bad connection	Property damage	Paid for damages	$377.70
10/30/2015	Voltage fluctuations	Property damage	Paid for damages	$1,175.00
There were no instances of personal injury due to system failures in 2015.				

IV. RELIABILITY REPORTING REQUIREMENTS 7826.0500

Subpart 1. Annual reporting requirements. On or before April 1 of each year, each utility shall file on its reliability performance during the last calendar year.

REPORT OF OTTER TAIL'S SAIDI, SAIFI, AND CAIDI FOR 2015 AND STORM NORMALIZATION OF RELIABILITY DATA

Minnesota Rule 7826.0500, Subparts 1a, 1b, 1c, and 1d requires the utility to file a report on its SAIDI, SAIFI and CAIDI for the calendar year, by work center and for its assigned service area as a whole. Additionally, this rule requires the utility to provide an explanation of how the utility normalized its reliability data to account for major storms.

As a review, in 2009, Otter Tail worked with Sensus, who is the provider of Otter Tail's Interruption Monitoring System (IMS) and the underlying software for the system, to make necessary changes to implement the IEEE 2.5 beta method process to normalizing reliability data. Otter Tail's 2.5 Beta process is based on the following assumptions:

- Sensus calculates annual system T_{med} (SAIDI/Day threshold) based on the previous five years of data.
- The system T_{med} is utilized to run our indices for Minnesota and individual Minnesota Customer Service Centers (CSCs).

For 2015 data, the 2.5 beta parameters were as follows:

2.5 Beta Parameters:

Alpha	Beta	Major Event Day
-2.142537766	1.851619021	12.019253069

The application of 2015 2.5 Beta Parameters, had no effect on 2015 results, thus, the following storm normalized results are realized:

After applying 2.5 Beta Parameters for 2015, zero days met the criteria to be considered a Major Event Day. Since there were no Major Event Days in 2015, there are no major causes of outages to report.

Table 4 below shows Otter Tail's 2015 SAIFI, CAIDI and SAIDI results based on the IEEE 2.5 Beta Method for each CSC and the entire Minnesota system. **Otter Tail met 61 percent of its targets for 2015, compared to 50 percent in 2014.**

Table 4

2.5 Beta				
CSC	2015	SAIFI	CAIDI	SAIDI
Bemidji	Goal	1.26	56.06	70.64
	Actual	0.71	104.10	74.10
Crookston	Goal	1.19	58.26	69.33
	Actual	1.10	48.90	52.20
Fergus Falls	Goal	1.11	60.33	66.97
	Actual	0.61	56.50	34.70
Milbank	Goal	1.82	41.48	75.49
	Actual	1.30	51.00	66.00
Morris	Goal	1.01	55.23	55.78
	Actual	0.85	61.30	52.10
Wahpeton	Goal	1.13	50.65	57.24
	Actual	2.26	79.40	179.40
MN Total	Goal	1.13	57.48	64.95
	Actual	0.80	66.70	53.30

ACTION PLAN FOR REMEDYING ANY FAILURE TO COMPLY WITH RELIABILITY STANDARDS

Minnesota Rule 7826.0500, Subpart 1e, **requires utilities to file an action plan for remedying any failure to comply with reliability standards set forth in part 7826.0600 or an explanation as to why non-compliance was unavoidable under the circumstances.** Overall, Otter Tail Minnesota Customers experienced 276 sustained interruptions in 2015. Otter Tail provides the following information regarding its 2015 results.

In compliance with the Commissions **December 20, 2012 Order in Docket No. E017/M-12-325**, Otter Tail submitted a compliance filing on February 4, 2013 describing Otter Tail's action plans to address not meeting the 2011 reliability standards set by the Commission. In that filing, Otter Tail described several enhanced or new processes adopted by the Company to improve system reliability performance. The following is an updated status of those action items and processes:

1. **Reliability Improvement Initiative Team Meetings:** Otter Tail's Reliability Improvement Initiative cross functional team continues to meet monthly with the purpose of conducting a comprehensive overview of system reliability. This process continues to be very beneficial in providing increased focus and attention to reliability related issues.

2. **Electronic Tracking Process for Transmission Patrol Reports and Maintenance Activities:** Otter Tail continues to implement electronic tracking of internal reports in 2016. This will allow the Company to more effectively schedule and manage maintenance activities based on historic and current maintenance data and allow for more efficient prioritization of resources.

3. **Lightning Tracking System:** Otter Tail's lightning tracking system has been in service for three years. It is used to track lightning activity within Otter Tail's service territory. It is very beneficial in identifying remote areas hit by lightning, thus allowing for follow up patrols and inspections for any damage identification.

4. **IMS System sustained interruption cause information investigation:** For the past four years, Otter Tail has had the requirement that detailed information regarding the primary cause of all sustained interruptions at the feeder level and above be entered into the IMS. To date, cause investigation has improved providing post event analysis and capital improvement planning.

5. **Fault Indicator Installations at Transmission Line Junctions:** In 2014, Otter Tail began installing fault indicators on transmission line junctions (line splits). OTP will continue to monitor and investigate improvements this equipment has made in our abilities to identify fault location detection.

6. **Installation of Remote Real-Time Voltage, Current, and Power Monitors**: In 2014 Otter Tail began installing remote real-time power monitors in the field for problem investigation purposes. Data is real-time and displayed via a web browser. Initial trials of this equipment have improved Otter Tail's efforts in the identification of problems and issues in the field. Otter Tail Power continues deployment of this equipment throughout the system. Deployment of this equipment has quadrupled throughout 2015, as this tool has provided excellent benefits.

7. **Fleet Vehicle Tracking:** Otter Tail continues to evaluate various solution providers of service vehicle tracking options with this program that was initiated on certain Company vehicles in 2012.

Otter Tail believes these action plans will provide continued contribution towards cost-effective improvement of the Company's overall system reliability. Overall system improvements will be realized over longer periods of time. These improvements will come through new technology, improved efficiencies, disciplined primary cause investigation and analysis, situational awareness, and attention to overall cross-functional accountabilities.

Furthermore Otter Tail provides a description of events that had the greatest impact on SAIDI, SAIFI and CAIDI indices that did not meet the 2015 Reliability Standards as set by the Commission in the **August 14, 2015 Order in Docket E017/M-15-322**.

Otter Tail's 2015 SAIDI standards – In 2015, Bemidji and Wahpeton CSCs, failed to meet the 2015 SAIDI reliability standards set by the Commission.

Bemidji CSC: The Bemidji CSC experienced 50 sustained interruptions in 2015, resulting in a SAIDI of 74.1 minutes compared to the standard of 70.64. The two greatest impacts to SAIDI results in the Bemidji CSC were an insulator failure on March 29, 2015 and a weather event on August 12, 2015. On March 29, 2015, a bell insulator failed on the Bemidji 115KV Sub – Downtown OCR #25 Feeder, impacting 636 customers. Crews spent much time searching for the cause of the fault. The failed insulator was located in a swamp, which increased the duration (4 hours, 23 minutes) in fault location identification as well as the repairs necessary to return the feeder back into service. This

feeder is identified as the Bemidji CSC's worst performing feeder in 2015. On August 12, 2015, a storm with straight line winds, in excess of 75 mph, knocked down multiple lines, poles, and several trees, causing a 9 hour and 5 minute interruption on the Clearbrook – Main Feeder, which impacted 364 customers.

Wahpeton CSC: The Wahpeton CSC experienced 11 sustained interruptions in 2015, resulting in a SAIDI of 237.23 minutes compared to the goal of 57.24. As a review, there are only six feeders serving Minnesota customers out of this service center. The greatest impact to the SAIDI results in the Wahpeton CSC was an interruption lasting one hour and 19 minutes which occurred on the Wheaton – North and West Feeder. This interruption occurred on June 25, 2015, impacting 628 customers. This interruption was caused by a private party tree trimmer who dropped a tree on the distribution line, causing the line to burn and collapse to the ground. This feeder was Wahpeton CSC's worst performing feeder for 2015.

Otter Tail 2015 SAIFI standards –The Wahpeton CSC failed to meet the 2015 SAIFI reliability standards set by the Commission.

Wahpeton CSC: As previously stated, the Wahpeton CSC experienced 11 sustained interruptions in 2015, resulting in a SAIFI of 2.26 interruptions, compared to a goal of 1.13 interruptions.

Otter Tail 2015 CAIDI standards – The Bemidji, Milbank, Morris and Wahpeton Customer Service Centers did not meet the 2015 CAIDI reliability standards set by the Commission.

Bemidji CSC: The Bemidji CSC experienced 50 sustained interruptions in 2015, resulting in a CAIDI of 104.1 minutes, compared to a goal of 56.06 minutes. Twenty two of these interruptions had durations of greater than the standard set of 56.06 minutes. Two interruptions had the greatest impact on CAIDI results. As described in the Bemidji CSC SAIDI discussion above, on August 12, 2015, a storm with straight line winds caused a nine hour and five minute interruption on the Clearbrook – Main Feeder. On October 12, 2015, a transformer failed in the Bejou Substation, causing a seven hour interruption on the Bejou – Main Feeder. The transformer, still under warranty, has been sent to the manufacturer for forensic analysis. There has been no word back yet as to the cause of the failure.

Milbank CSC: Minnesota customers served out of the Milbank CSC experienced six sustained interruptions in 2015, resulting in a CAIDI of 51 minutes, compared to a goal of 41.48 minutes. As a review, there are only five feeders serving Minnesota customers out of this service center. Three of these interruptions had durations of greater than the standard set of 41.48 minutes. The two interruptions having the largest contribution to CAIDI results were due to the same event. On December 22, 2015, the static line on a 115 KV transmission line near Toronto broke and fell into the energized phases. This caused a two hour and 50 minute interruption on both the Marietta – Farms Feeder, impacting 33 customers, and the Nassau – Main Feeder, impacting 85 customers. The Nassau – Main Feeder is identified as Milbank CSCs worst performing feeder for 2015.

Morris CSC: The Morris CSC experienced 82 sustained interruptions in 2015, resulting in a CAIDI of 61.3 minutes, compared to a goal of 55.23 minutes. Twenty nine of these

interruptions had durations of greater than the standard set at 55.23 minutes. One interruption had the biggest impact on CAIDI results. On May 13, 2015, high winds took down trees, damaging and tearing down both distribution and transmission lines causing an eight hour and 41 minute interruption on the Holloway – South Feeder, impacting 12 customers. Since this event, the Company has completed tree trimming along this feeder.

Wahpeton CSC: Minnesota customers served out of the Wahpeton CSC experienced eleven sustained interruptions in 2015, resulting in a CAIDI of 79.4 minutes, compared to a goal of 50.65 minutes. Ten of these interruptions had durations of greater than our goal of 50.65 minutes. Two interruptions, due to a single event, had the largest impact on CAIDI results. On June 20, 2015, a conductor splice broke causing numerous issues including a burned off crossarm. This event caused two interruptions, one on the Nashua Tintah – Main feeder, impacting 65 customers and one on the Nashua Tintah – Tintah Feeder, impacting 40 customers. This event was complicated by the fact that the fault indicator at the switch, which should have given the appropriate fault location, did not function properly, thus, 33 miles of transmission line had to be patrolled to locate the fault. Once it was located, appropriate crews and equipment were sent to the location for repairs.

Reliability Standard Summary:

When compared to 2014, Otter Tail's 2015 overall Minnesota reliability performance realized an improvement in SAIDI, SAIFI, and MAIFI. CAIDI remained essentially the same when compared to 2014 results.

Reliable service continues to be one of Otter Tail's top priorities and we are cognizant that ongoing improvements in reliability will continue to happen over time and must be done cost effectively. We believe the continued application of our current processes and the application of new technologies and tools will continue to provide good results.

Table 5 provides a summary identifying the different types of interruptions causes that affect overall system reliability.

Table 5

2015 MN Sustained Interruption Summary by CSC and cause

	Bemidji	Crookston	Fergus Falls	Milbank	Morris	Wahpeton	Work Center Totals
Bulk Power Loss	0	0	0	0	0	0	0
Transmission	3	1	7	0	5	3	19
Flood	0	0	0	0	0	0	0
Animal	0	1	0	0	6	1	8
Vehicle Accident	0	2	2	0	1	0	5
Equipment Failure	20	14	6	0	13	4	57
Vandalism	0	0	0	0	0	0	0
Trees	1	0	4	0	3	2	10
Overload	0	0	0	0	0	0	0
Human error	0	1	0	0	0	0	1
Underground	0	0	4	0	2	0	6
Bird	0	1	0	0	0	0	1
Arrestor/Insulator failure	0	0	1	0	5	0	6
Fuse	0	0	0	0	0	0	0
Weather related	22	44	20	4	44	0	134
Investigated and Unknown	1	0	0	0	0	0	1
Other	3	10	2	0	2	1	18
Unknown	0	0	7	2	1	0	10

INTERRUPTION OF BULK POWER SUPPLY FACILITY

Pursuant to Minnesota Rule 7826.0500, Subpart 1f, **to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption.** For the 2015 calendar year Otter Tail reports that it had two sustained interruptions to a Minnesota Bulk Power Supply Facility.

Graceville GRE 115KV: On April 28, 2015, the Graceville circuit breaker relayed to lockout at 4:34 PM. Crews were dispatched to the fault location identified by the SEL relay and no cause was found. The line was patrolled and again no cause was identified. The line was returned to service at 6:35 PM.

Winger Minnkota Power Company (MPC) 230KV: On April 30, 2015, the Winger Substation locked out on a transformer differential fault indication at 5:20 PM. MPC crews found a dead bird at the transformer and it was identified as the cause. The transformer was returned to normal at 7:45 PM.

REPORTING MAJOR SERVICE INTERRUPTIONS

Minnesota Rule 7826.0500, Subpart 1g, **requires utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions.**

Pursuant to Minnesota Rule 7826.0500, Subpart 1g, Otter Tail provides as Attachment 1, a copy of each report filed under part 7826.0700, reporting major service interruptions.

CIRCUIT INTERRUPTION DATA

Minnesota Rule 7826.0500, Subparts 1h, requires utilities, to the extent technically feasible, to file circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit's SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit's performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance. In compliance with this rule, **Table 6** below shows the worst performing circuit for each of Otter Tail's six CSC's. For the purpose of identifying the worst performing circuit, we defined a circuit as a distribution feeder and the criterion that was used to identify the worst performing circuit was total customer minutes. **Table 7** below shows the interruptions that contributed to the feeders being the worst performing circuit for each CSC.

Table 6
MN Worst Performing Feeders

Service Center	Substation Name	Feeder Description	Customer Count	Total Sustained Customer Minutes	SAIFI	CAIDI	SAIDI
BEMIDJI	CLEARBROOK	MAIN FEEDER	364	287632.8	2	395.1	790.2
CROOKSTON	CROOKSTON BARRETTE ST	SOUTH OCR 2	564	71684.4	1	127.1	127.1
FERGUS FALLS	ERDAHL	MAIN FEEDER	446	99948.6	2	112.05	224.1
MILBANK	NASSAU	MAIN FEEDER	85	14502.42	1	170.62	170.62
MORRIS	APPLETON	EAST FEEDER	742	121984.8	2	82.2	164.4
WAHPETON	WHEATON	NORTH AND WEST FEEDER	628	94231.4	2	75.03	150.06

Table 7
MN Worst Performing Feeders Details

Interruption Date	State	Service Center	Substation	Feeder Name	Cause	Duration
8/12/2015 17:29	MN	BEMIDJI	CLEARBROOK	MAIN FEEDER (26384)	Weather - includes: rain, lightning, wind, storm, etc.	9:04:35
5/28/2015 7:38	MN	BEMIDJI	CLEARBROOK	MAIN FEEDER (26384)	Equipment Failure	4:05:37
7/24/2015 2:24	MN	CROOKSTON	CROOKSTON BARRETTE ST	SOUTH OCR 2 (31594)	Weather - includes: rain, lightning, wind, storm, etc.	2:07:06
10/11/2015 19:10	MN	FERGUS FALLS	ERDAHL	MAIN FEEDER (32283)	Trees	1:42:41
6/27/2015 20:04	MN	FERGUS FALLS	ERDAHL	MAIN FEEDER (32283)	Arrester/Insulator failure	2:01:25
12/22/2015 13:43	MN	MILBANK	NASSAU	MAIN FEEDER (17478)	Unknown	2:50:37
12/6/2015 4:49	MN	MORRIS	APPLETON	EAST FEEDER (32975)	Underground	1:03:55
9/21/2015 2:11	MN	MORRIS	APPLETON	EAST FEEDER (32975)	Underground	1:40:29
6/25/2015 12:20	MN	WAHPETON	WHEATON	NORTH AND WEST FEEDER (27004)	Other	1:19:00
4/28/2015 16:35	MN	WAHPETON	WHEATON	NORTH AND WEST FEEDER (27004)	Transmission	1:11:03

Bemidji CSC:
The 2015 worst performing feeder in the Bemidji CSC was the Main Feeder fed from the Clearbrook Substation. This feeder experienced two sustained interruptions, impacting 364 customers, due to two separate events. On May 28, 2015, a switch failed on the transmission line at the Clearbrook Substation, causing a four hour and five minute interruption. Once the problem was identified and repair parts were located and delivered, the other switch, at the sub had to be opened, isolating the town so that the failed switch could safely be repaired. On August 12, 2015, a severe storm with straight line winds took down several lines, power poles, and trees. This interruption lasted just over nine hours.

Vegetation is scheduled to be trimmed at the Clearbrook – Main Feeder in 2016. Investigations are also underway to study possible tap switch locations on this line in this area, to provide an alternate power route, in the event of a future similar problem.

Crookston CSC:
The 2015 worst performing feeder in the Crookston CSC was the South OCR 2 Feeder fed out of the Crookston Barrette Street Substation. This feeder experienced one sustained interruption impacting 564 customers, due to a single event. On July 24, 2015, a storm tracked through the area knocking a tree down on the transmission line feeding the substation. After the tree was cleared and the 41.6 KV transmission system was restored, service personnel tried to restore service to the feeder, however, the distribution breaker opened upon restore. Service personnel then patrolled the feeder line and found another tree in the lines that had to be cleared, prior to feeder service restoration.

Fergus Falls CSC:
The 2015 worst performing feeder in the Fergus Falls CSC was the Main Feeder fed out of the Erdahl Substation. This feeder experienced two sustained interruptions, impacting 446 customers, due to two separate events. On June 27, 2015, a lightning arrestor failed causing a two hour interruption. On October 11, 2015, a large tree, outside of the right a way, fell down on the line and caused a one hour and 43 minute interruption.

Milbank CSC:
The 2015 worst performing feeder in the Milbank CSC, serving Minnesota customers, was the Main Feeder fed from the Nassau Substation. This feeder experienced one sustained interruption, which impacted 85 customers, due to a single event. On December 22, 2015, high winds hit the area and caused significant damage on the Otter Tail System. During the 24 hour period, our entire system experienced 445 momentary interruptions and 94 sustained interruptions. During this event, the Main Feeder, fed from the Nassau Substation, experienced a two hour and 51 minute interruption when the static line on a 115 KV transmission line broke and fell into the energized phases. When the line failed, a circuit breaker at the Big Stone Plant failed to operate, causing the interrupted area to be more widespread when back up protection operated.

Following the event, Otter Tail System Protection Engineers made relay setting adjustments and conducted follow up testing on the failed circuit breaker to prevent future issues.

Morris CSC:
The 2015 worst performing feeder in the Morris CSC was the East Feeder fed from the Appleton Substation. This feeder experienced two sustained interruptions, impacting 742 customers, due to two separate events related to failed underground cable. On September 21, 2015, an underground primary conductor faulted resulting in a one hour and 41 minute interruption, impacting 742 customers. On December 6, 2015, another underground fault occurred, resulting in a one hour and four minute interruption.

Otter Tail Power Company is currently studying this situation and evaluating underground replacement with possible overhead lines.

Wahpeton CSC:
The 2015 worst performing feeder in the Wahpeton CSC, serving Minnesota customers, was the North and West Feeder, fed from the Wheaton Substation. This feeder experienced two sustained interruptions, due to two separate events, impacting 628 customers. On April 28, 2015, as detailed in the "Interruption of Bulk Power Supply Facility" and regarding the Graceville 115KV Facility, the Graceville circuit breaker relayed to lockout, resulting in a one hour and 11 minute interruption, impacting 628 customers. No cause was identified following a patrol by crews and the line was returned to service. On June 25, 2015, a private party trimming trees dropped a branch on the distribution line, resulting in a one hour and 19 minute interruption.

REPORT OF NOMINAL ELECTRIC SERVICE VOLTAGES

Minnesota Rule 7826.0500, Subpart 1i, **requires that utilities shall file a report providing data on all known instances in which nominal electric service voltages on the utility's side of the meter did not meet the stands of the American National Standards Institute for nominal system voltages greater or less than voltage range B.** Otter Tail provides, in **Table 8** below, the feeders and number of occurrences where the voltage fell outside the ANSI voltage range B. Most of the feeders, with numerous occurrences, are feeders with a single large customer that has a very large load and are mostly pipelines.

Table 8
Feeders and Number of Occurrences – Voltage fell outside the ANSI Voltage Range

Unit ID	CSC	Feeder	Mid UV Count	Low OV Count
16130	MORRIS	MAIN FEEDER	1	0
16144	MORRIS	MAIN FEEDER	1	0
16147	MORRIS	EAST FEEDER	2	0
16148	MORRIS	WEST FEEDER	1	0
16149	MORRIS	MAIN FEEDER : RURAL HWY 27 WES	1	0
16150	MORRIS	MAIN FEEDER : HOFFMAN	1	0
16734	MILBANK	NORTH FEEDER	1	0
16740	MILBANK	SOUTH FEEDER	1	0
23638	BEMIDJI	SOUTH FEEDER	1	0
23647	MILBANK	FARMS	1	0
26384	BEMIDJI	MAIN FEEDER	0	369
26389	MORRIS	EAST 2	0	12
26396	DEVILS LAKE	MAIN FEEDER	1	0
26999	BEMIDJI	MAIN FEEDER	0	360
27000	BEMIDJI	MAIN FEEDER	2	0
27075	BEMIDJI	MAIN FEEDER	0	473
27687	CROOKSTON	BELTRAMI RURAL NORTH	0	3
31586	BEMIDJI	DOWNTOWN OCR #75	0	1
31598	CROOKSTON	MAIN FEEDER	0	344
32130	CROOKSTON	MAIN FEEDER	0	330
32131	CROOKSTON	NORTH OCR 1	0	3
32137	CROOKSTON	MAIN FEEDER	0	273
32152	CROOKSTON	MAIN FEEDER	0	44
32183	CROOKSTON	MAIN FEEDER	0	591
32189	CROOKSTON	MAIN FEEDER	0	8
32200	BEMIDJI	MAIN FEEDER	0	142
32201	BEMIDJI	MAIN FEEDER	1	0
32210	CROOKSTON	MAIN FEEDER	0	817
32257	FERGUS FALLS	SOUTH FEEDER	0	1
32260	FERGUS FALLS	MAIN-SF885	0	63
32261	MORRIS	NORTH FEEDER	0	6
32263	MORRIS	MAIN FEEDER	1	0
32271	FERGUS FALLS	#2-OCR WEST	0	1
32272	FERGUS FALLS	#4-OCR TUFFYS	0	8
32284	FERGUS FALLS	MAIN FEEDER	1	0
32286	BEMIDJI	MAIN FEEDER	0	65
32288	BEMIDJI	NORTH	0	2
32289	BEMIDJI	SOUTH	0	2
32297	FERGUS FALLS	MAIN FEEDER	1	0
32308	FERGUS FALLS	NORTH FEEDER	0	15
32313	CROOKSTON	MAIN FEEDER	72	0
32952	MORRIS	MAIN FEEDER	0	1

STAFFING LEVELS AT EACH WORK CENTER

Minnesota Rule 7826.0500, Reliability Reporting Requirements, Subpart 1j, **requires utilities to file a report providing data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines.** In compliance with this rule, Otter Tail reports staffing levels by CSC including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines. The staffing levels of Otter Tail's Minnesota CSCs as of December 31, 2015 are shown in **Table 9** below.

Table 9

Month-Year	Department	Type	Total
	Bemidji	Field Office	15 4
	Bemidji Total		19
	Crookston	Field Office	15 3
	Crookston Total		18
	Delivery Maintenance*	Field Office	9 1
	Delivery Maintenance Total		10
	Fergus Falls	Field Office	23 9
	Fergus Falls Total		32
	Milbank**	Field Office	17 4
	Milbank Total		21
	Morris	Field Office	18 4
	Morris Total		22
	Operations Support	Field Office	3 1
	Operations Support Total		4
	Wahpeton	Field Office	14 3
	Wahpeton Total		17
12/31/2015 Total			**149**

*Delivery Maintenance is a department with employees that work in substations and with substation related equipment. During trouble, they are dispatched to do switching and other work associated with substation equipment.

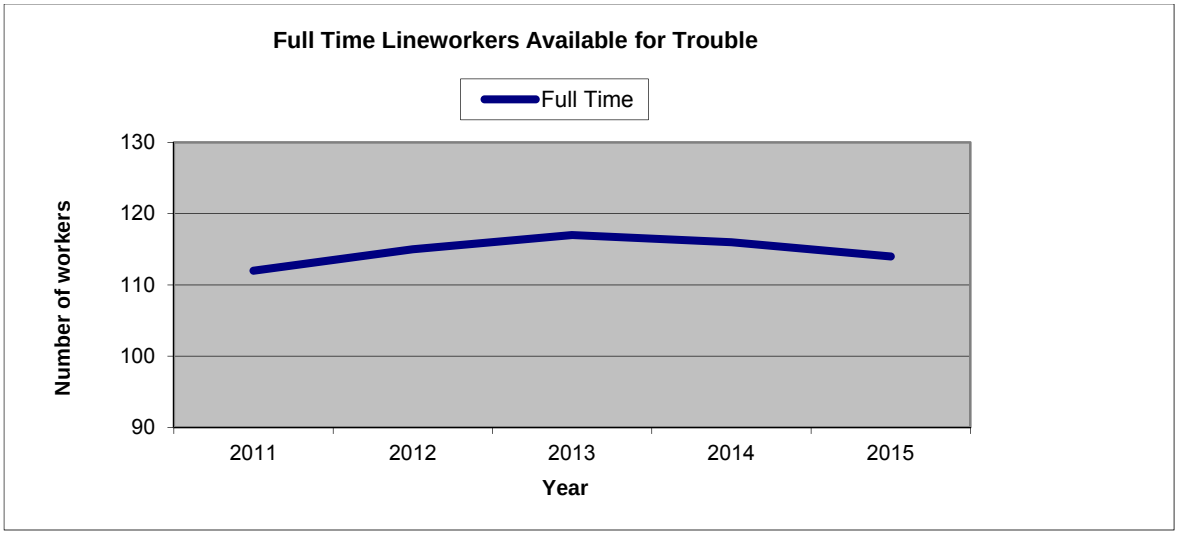
**The Milbank CSC serves customers in both Minnesota and South Dakota and the number of employees indicated represents all employees located in the CSC.

***Operations Support is based in Fergus Falls and the field employees are dispatched to assist CSC's in need throughout the entire system. The office employees coordinate resources.

****The Wahpeton CSC serves customers in Minnesota, North Dakota, and South Dakota and the number of employees indicated represents all employees located in the CSC.

Figure 7 below depicts by year the number of full time line workers available for trouble and for the operation and maintenance of distribution lines.

Figure 7



Otter Tail also has a reliability engineer who supports system reliability related functions. This individual is not included in the above staffing level information. Otter Tail also has other engineers in its Asset Management area who, due to the nature of their roles, support reliability on a daily, weekly, monthly, and annual basis.

OTHER INFORMATION RELEVANT IN EVALUATING RELIABILITY PERFORMANCE

Minnesota Rule 7826.0500, Subpart 1k, **requires utilities to file any other information the utility considers relevant in evaluating its reliability performance over the calendar year.** Otter Tail reports that it continues to optimize usage of its Interruption Monitoring System (IMS).

As a review, the IMS was fully implemented in 2005. Since then, subsequent upgrades and enhancements to the system have increased its capabilities. Due to communication limitations and equipment obsolescence, Otter Tail's IMS will experience "end of life" around 2018 (Verizon's CDMA 1XRTT). Otter Tail is currently investigating the next generation of interruption monitoring solutions (NextGen IMS) for beyond 2018. Otter Tail provides the following information relating to its IMS and overall reliability.

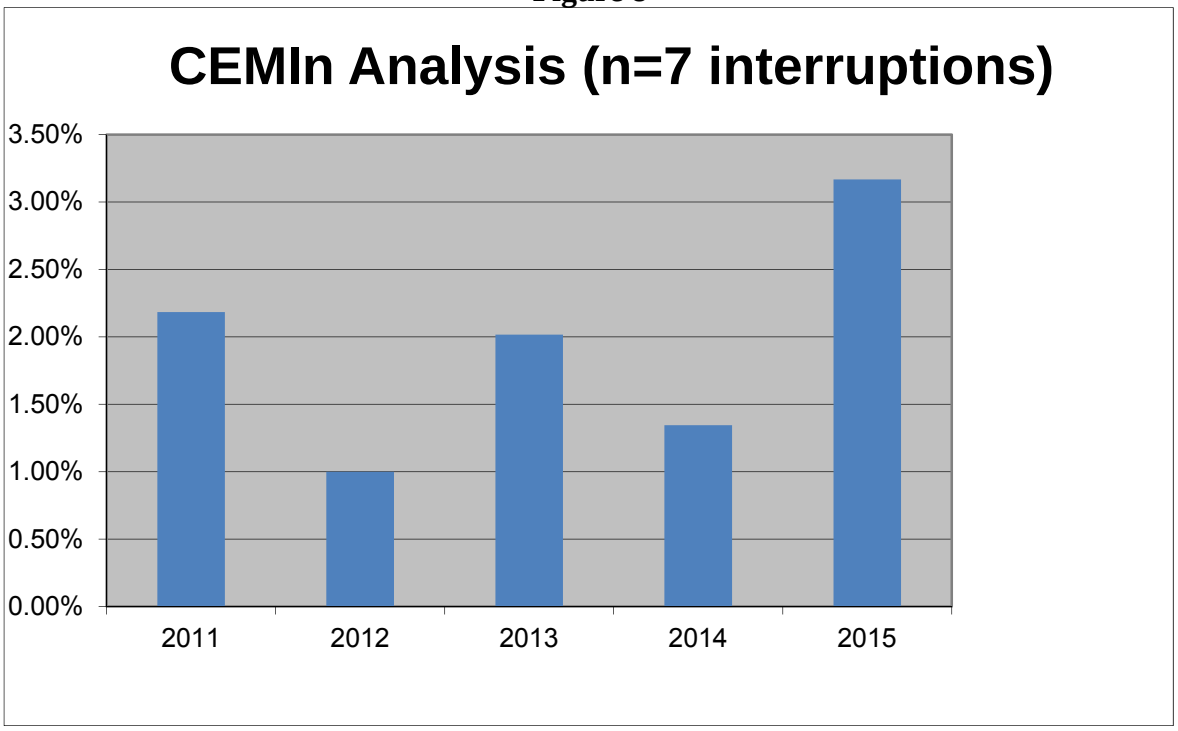
1. **IMS obsolescence status and efforts to implement the NextGen IMS:** Due to the planned shutdown of cellular 2G service and Sensus's decision to discontinue production of the monitors currently used in our system, Otter Tail Power has begun a project to replace its current IMS. Our plan is to implement a new system in North Dakota mid to late 2016, while utilizing those components replaced in North Dakota to maintain our current systems in both Minnesota and South Dakota. Once the new system is implemented and meets all necessary requirements (mid 2017), our plan is to scale up the new system in the other two states. Our plan is to have as much functional system overlap (2G shutdown date dependent) as possible in Minnesota to allow for data comparison and correlation of the two systems. The new system will have several technological advancements and provide additional capability over our existing system. Overall, the new system will provide added tools and analysis features that will allow Otter Tail Power to continue its reliability focus and efforts in the future.

   Also, throughout 2015, Otter Tail Power has installed and utilized wireless power quality monitors in identified problem areas. These devices monitor voltage, current, power, voltage unbalance, histograms, profiles, etc. near real-time. These monitors have greatly improved our ability to monitor, identify, and analyze issues in the field. This tool will also be utilized to fill short term gaps/pockets created during our NextGen IMS implementation that will be created during installation and system transfer.

2. **Challenges in achieving reliability:** Otter Tail has the unique challenge of delivering reliable services to its customers across a large rural service territory, which has tremendous exposure to hazards such as vegetation, lightning, wind, and other weather related issues. Our current IMS, the use of power quality meters, and implementation of our NextGen IMS, will continue to provide optimized and focused deployment of our vegetation management and maintenance resources to specific areas that are identified through the outage data collected.

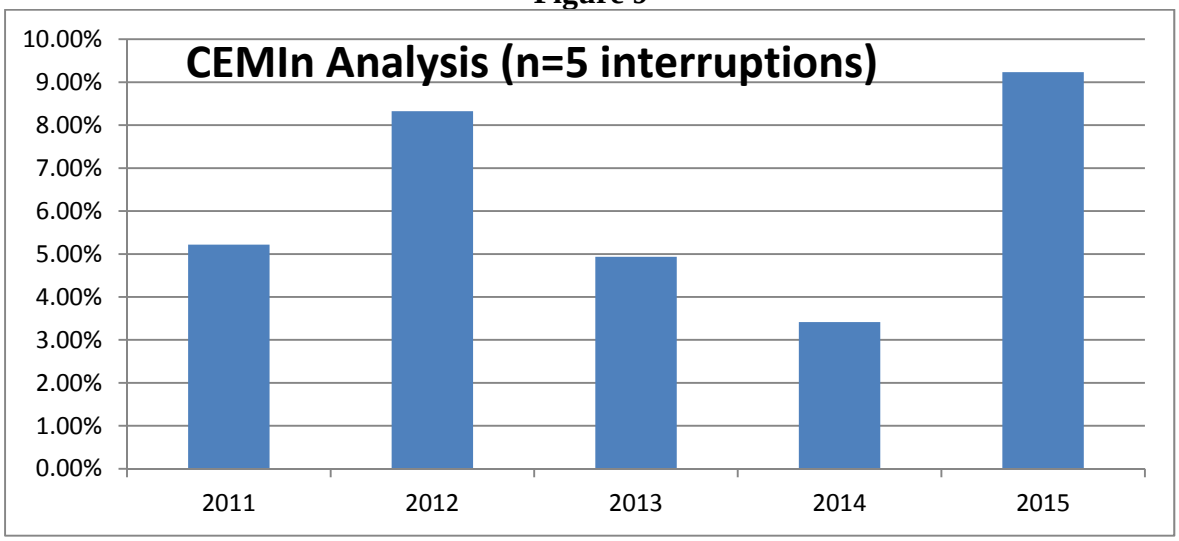
3. **Measuring reliability:** Otter Tail continues to calculate the Customers Experiencing Multiple Interruptions (CEMIn) index. The CEMIn index is an excellent indicator of how system improvements directly affect customer service. Deployment of resources on worst performing circuits has direct effects on the reliability indices and customer reliability. **Figure 8** shows the system CEMIn results from 2011 to 2015. This graph shows how many customers on a company-wide basis experienced seven or more interruptions. For example in 2015 the percentage of customers experiencing seven or more interruptions was just over 3 percent, compared to 2014, which was 1.3 percent.

Figure 8



In 2012, Otter Tail began to track and analyze system CEMI5 data. We believe the threshold of five interruptions allows us to better identify and consider actions to be taken to improve performance of transmission and distribution line sections. **Figure 9** below shows the percentage of customers on a company-wide basis who have experienced five or more sustained interruptions.

Figure 9



Figures 10, 11, and 12. The following graphs show Otter Tail's SAIDI, SAIFI and CAIDI for the period of 2011 through 2015. When compared to 2014 results, Minnesota customers experienced a decrease in overall SAIDI and SAIFI, while CAIDI remained constant. Minnesota SAIDI is the lowest it has been since 2009. SAIFI continues to trend downward and 2015 results were as low as they have been since recording started in 2005.

Figure 10

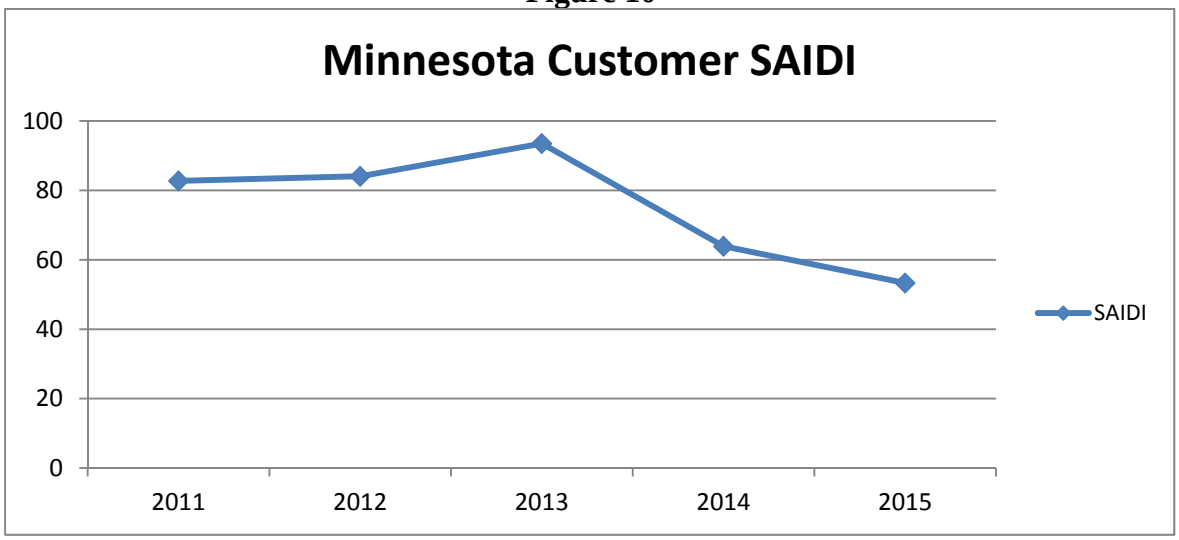


Figure 11

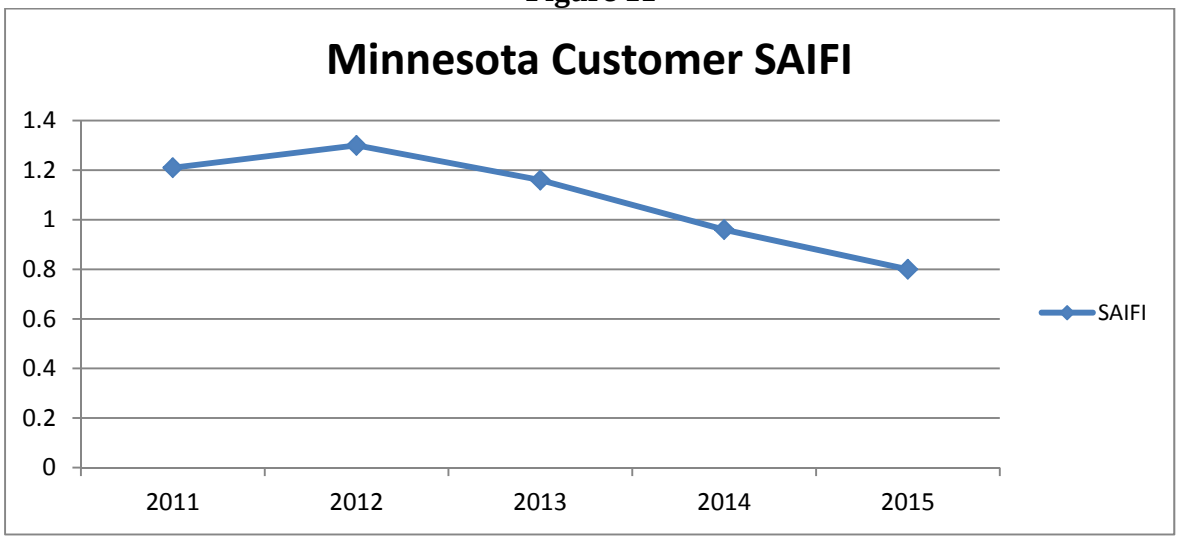
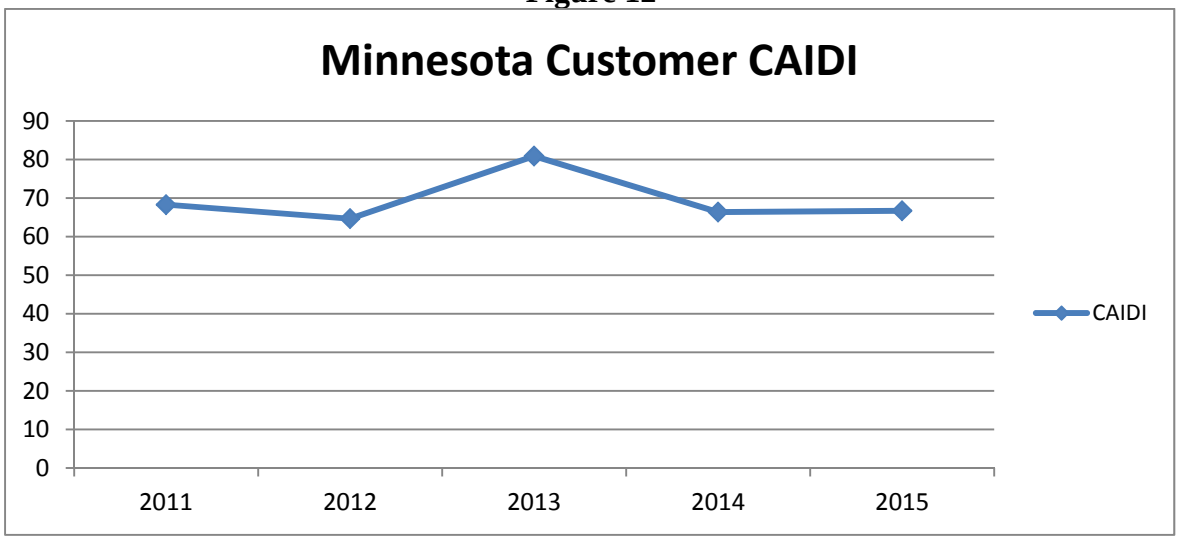


Figure 12



OTTER TAIL POLICIES, PROCEDURES, AND ACTIONS

Otter Tail provides the following description of the policies, procedures, and actions that it has previously implemented, and continues to utilize to improve reliability.

The following is a list of reports that continue to be distributed internally. These reports ensure that Otter Tail employees are aware of issues in the system on a timely basis and can respond quickly to maintain and improve overall system reliability.

1. Internal Reporting:
    a. **Weekly feeder reports:** Otter Tail publishes weekly feeder reports to area engineering and customer service staff that indicate worst performing circuits in relation to both momentary and sustained interruptions. Otter Tail's Area Engineers and Operations Managers review these reports to determine what steps should be taken to proactively maintain the system. Some cases require immediate action and others require a line patrol to determine the cause of an outage and the problem to be addressed. If an upgrade is required, the Area Engineer will gather data and follow through with a capital budget request. During our NextGen IMS scale-up, the submission of these reports will be halted until the processes/tasks for continued report generation are set up.
    b. **Monthly Reliability Report:** Otter Tail distributes to all employees an overall summary of system performance as compared to internal KPI's. This report shows SAIDI, SAIFI, CAIDI, and MAIFI for the system, as well as each CSC.
    c. **Additional reporting:** Otter Tail also tracks CEMI on an annual basis and has internal KPI's that are reported and published to Otter Tail's Asset Management department.

2. Proactive Inspections and Testing:
    a. **Field Inspections:** Otter Tail conducts several periodic patrols and inspections throughout the transmission and distribution system. Transmission substations and lines are inspected and patrolled on an annual basis and more often when issues are identified. Distribution substations are inspected for safety and equipment concerns on a periodic basis. The oil in substation transformers are sampled and tested for dissolved gas. Transformers greater than 10 MVA are tested annually and transformers less than 10 MVA are tested every three years.
    b. **Pole integrity testing:** Otter Tail currently contracts for ground line inspections and treatment work of aged transmission poles for replacement identification. In 2008, we began inspection and treatment of distribution poles as well.
    c. **Underground Replacement:** Otter Tail continues its focus on replacing outdated and failing underground conductors. The Area Engineers proactively identify areas of concern and budget for replacement during the following year. Potential replacement candidates are identified and included in Otter Tail's Proactive UG Replacement project listing.

Additional Items: In addition to the above-mentioned items, Otter Tail also employs a number of other policies, procedures, and committees to evaluate reliability and safety concerns that include, but are not limited to:

Distribution Standards Committee
Line inspections
Workforce Planning Committee
Transformer Installation and Change-out Loading Guide
Voltage upgrades and evaluations as needed
Mobile underground fault locating vans and associated equipment
Wildlife protection and deterrent devices

V. RELIABILITY STANDARDS 7826.0600

PROPOSED RELIABILITY PERFORMANCE STANDARDS

Minnesota Rule 7826.0600, Subpart 1, requires utilities to file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers.

As ordered in **Docket No. E017/M-15-322 dated August 14, 2015**, Otter Tail's reliability standards have been frozen, until the company has shown sufficient improvement in indices' performance. Although OTP has improved over the last two years, we propose maintaining the performance standards at 2013 levels until further improvement is achieved.

Table 10
Proposed Reliability Standards for 2016

Work Center	SAIDI	SAIFI	CAIDI
Bemidji	70.64	1.26	56.06
Crookston	69.33	1.19	58.26
Fergus Falls	66.97	1.11	60.33
Milbank	75.49	1.82	41.48
Morris	55.78	1.01	55.23
Wahpeton	57.24	1.13	50.65
All MN Customers	64.95	1.13	57.48

VI. REPORTING METER-READING PERFORMANCE 7826.1400

Minnesota Rule 7826.1400, **Reporting Meter Reading Performance, requires utilities to provide a detailed report on the utility's meter-reading performance.** In compliance with this rule, Otter Tail provides **Tables 11-15** for its meter reading performance for 2015.

A & B. The number and percentage of customer meters ready by utility personnel and the number and percentage of customer meters self-read by the customer.

Table 11
Otter Tail Power Company Meter Reading Performance
January 1, 2015 to December 31, 2015
Residential – MN

	Residential						
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	60,850	97.5%	612	1.0%	953	1.5%	62,415
2	59,812	95.7%	1,734	2.8%	956	1.5%	62,502
3	60,714	97.1%	871	1.4%	956	1.5%	62,541
4	60,646	97.1%	850	1.4%	951	1.5%	62,447
5	60,538	96.6%	1,144	1.8%	964	1.5%	62,646
6	60,685	94.9%	2,299	3.6%	966	1.5%	63,950
7	60,853	95.3%	2,060	3.2%	966	1.5%	63,879
8	61,343	96.2%	1,433	2.2%	966	1.5%	63,742
9	61,305	95.8%	1,733	2.7%	966	1.5%	64,004
10	59,970	94.4%	2,567	4.0%	970	1.5%	63,507
11	59,535	94.7%	2,355	3.7%	967	1.5%	62,857
12	60,386	96.3%	1,337	2.1%	962	1.5%	62,685
	726,637	*96.0%*	*18,995*	*2.5%*	*11,543*	*1.5%*	*757,175*

Table 12
Otter Tail Power Company Meter Reading Performance
January 1, 2015 to December 31, 2015
Small Commercial – MN

	Small Commercial						
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	13,795	96.2%	137	1.0%	401	2.8%	14,333
2	13,465	93.9%	477	3.3%	399	2.8%	14,341
3	13,828	96.5%	110	0.8%	396	2.8%	14,334
4	13,811	96.2%	155	1.1%	393	2.7%	14,359
5	14,390	96.3%	158	1.1%	396	2.6%	14,944
6	14,272	95.0%	362	2.4%	395	2.6%	15,029
7	14,206	94.2%	477	3.2%	396	2.6%	15,079
8	14,395	95.6%	259	1.7%	396	2.6%	15,050
9	14,362	95.3%	306	2.0%	397	2.6%	15,065
10	14,042	93.6%	568	3.8%	397	2.6%	15,007
11	14,109	94.4%	445	3.0%	397	2.7%	14,951
12	13,801	95.6%	239	1.7%	389	2.7%	14,429
	168,476	*95.2%*	*3,693*	*2.1%*	*4,752*	*2.7%*	*176,921*

Table 13
Otter Tail Power Company Meter Reading Performance
January 1, 2015 to December 31, 2015
Large Commercial – MN

	Large Commercial						
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	1,412	99.8%	3	0.2%	.		1,415
2	1,369	97.1%	41	2.9%	.		1,410
3	1,409	99.6%	5	0.4%	.		1,414
4	1,413	99.8%	3	0.2%	.		1,416
5	1,397	99.5%	7	0.5%	.		1,404
6	1,403	99.3%	10	0.7%	.		1,413
7	1,382	97.5%	35	2.5%	.		1,417
8	1,400	99.4%	9	0.6%	.		1,409
9	1,399	98.8%	17	1.2%	.		1,416
10	1,377	97.7%	33	2.3%	.		1,410
11	1,393	98.6%	20	1.4%	.		1,413
12	1,411	99.9%	1	0.1%	.		1,412
	16,765	*98.9%*	*184*	*1.1%*	.		*16,949*

Table 14
Otter Tail Power Company Meter Reading Performance
January 1, 2015 to December 31, 2015
Total – MN

	System						
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	76,057	97.3%	752	1.0%	1,354	1.7%	78,163
2	74,646	95.4%	2,252	2.9%	1,355	1.7%	78,253
3	75,951	97.0%	986	1.3%	1,352	1.7%	78,289
4	75,870	97.0%	1,008	1.3%	1,344	1.7%	78,222
5	76,325	96.6%	1,309	1.7%	1,360	1.7%	78,994
6	76,360	95.0%	2,671	3.3%	1,361	1.7%	80,392
7	76,441	95.1%	2,572	3.2%	1,362	1.7%	80,375
8	77,138	96.2%	1,701	2.1%	1,362	1.7%	80,201
9	77,066	95.8%	2,056	2.6%	1,363	1.7%	80,485
10	75,389	94.3%	3,168	4.0%	1,367	1.7%	79,924
11	75,037	94.7%	2,820	3.6%	1,364	1.7%	79,221
12	75,598	96.3%	1,577	2.0%	1,351	1.7%	78,526
	911,878	*95.9%*	*22,872*	*2.4%*	*16,295*	*1.7%*	*951,045*

C. The number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read.

In 2015, Otter Tail Power Company had no meters that were not read for a period of 6-12 months. There were no meters that were not read for a time period of greater than 12 months.

D. Data on monthly meter-reading staffing levels, by work center or geographical area.

Table 15

Count of Job		Month											
Department	Job	Jan-15	Feb-15	Mar-15	Apr-15	May-15	Jun-15	Jul-15	Aug-15	Sep-15	Oct-15	Nov-15	Dec-15
Bemidji	Apprentice Service Rep	1	1	1	1	1	1	1	1	1	1		
	Service Representative	8	8	8	8	8	8	7	7	7	8	9	9
Crookston	Service Representative	10	10	10	10	10	9	9	9	9	9	9	9
Fergus Falls	Service Representative	15	15	15	15	15	15	15	15	15	15	15	15
Milbank	Apprentice Service Rep	1	1	1	1	1	1					1	1
	Service Representative	10	10	10	10	9	9	11	11	11	12	11	12
Morris	Journeyman Meter Reader	1	1	1	1	1	1	1	1	1	1	1	1
	Service Representative	14	14	14	14	14	14	14	14	14	13	13	13
Wahpeton	Service Representative	10	10	10	10	10	10	10	10	10	10	10	10
Grand Total		**70**	**70**	**70**	**70**	**69**	**68**	**68**	**68**	**68**	**69**	**69**	**70**

Note: Milbank - The Milbank CSC serves customers in both Minnesota and South Dakota and the number of employees represents all employees for the CSC.

Note: Wahpeton - The Wahpeton CSC Center serves customers in Minnesota, North Dakota and South Dakota and the number of employees represents all employees for the CSC.

Otter Tail utilizes its Service Representatives to read its meters on a monthly basis except in the following towns where a third party reads the Company's meters:

Argyle, MN	Erskine, MN	Pelican Rapids, MN
Audubon, MN	Fergus Falls, MN	Perham, MN
Battle Lake, MN	Fertile, MN	Shevlin, MN
Bejou, MN	Fisher, MN	Solway, MN
Bemidji, MN	Frazee, MN	Tenney, MN
Campbell, MN	Gonvick, MN	Trail, MN
Clearbrook, MN	Gully, MN	Twin Valley, MN
Climax, MN	Hallock, MN	Ulen, MN
Clitherall, MN	Kent, MN	Vergas, MN
Crookston, MN	Mahnomen, MN	Vining, MN
Detroit Lakes, MN	McIntosh, MN	Waubun, MN
Doran, MN	Oklee, MN	Wilton, MN
Eldred, MN	Oslo, MN	Winger, MN

VII. REPORTING INVOLUNTARY DISCONNECTIONS 7826.1500

Minnesota Rule 7826.1500, **Reporting Involuntary Disconnections, requires utilities to provide a detailed report on involuntary disconnections of service.** In compliance with this rule, Otter Tail provides its report of involuntary disconnections of service.

A. Number of customers who received disconnection notices.

Table 16

Month	Large Commercial	Residential	Small Commercial	Grand Total
January	26	3,808	333	4,167
February	31	4,075	357	4,463
March	33	4,371	431	4,835
April	33	4,541	416	4,990
May	29	4,775	400	5,204
June	29	4,072	339	4,440
July	23	3,600	294	3,917
August	29	4,156	343	4,528
September	27	4,530	345	4,902
October	33	4,309	327	4,669
November	35	2,754	309	3,098
December	32	4,194	346	4,572
Grand Total	360	49,185	4,240	53,785

B. Number of customers who sought cold weather rule protection under Minnesota Statutes §216B.096 and §216B.097 and the number who were granted cold weather rule protection.

Table 17

Month	Customers who sought Cold Weather Rule Protection in 2015	Number Granted Cold Weather Protection in 2015
January	262	262
February	167	167
March	160	160
April	39	39
May	0	0
June	0	0
July	0	0
August	0	0
September	0	0
October	162	160
November	178	177
December	162	160

C. Total number of customers whose service was disconnected involuntarily and the number of these customers restored to service within 24 hours.

Table 18

7826.1500 Subpart C - Customers involuntarily disconnected in 2015				
Month	**Customer Class**	**Disconnected For more than 24 hours**	**Service Restored within 24 hours**	**Grand Total**
January	Residential	26	15	41
	Small Commercial	5	0	5
January Total		31	15	46
February	Residential	15	18	33
	Small Commercial	2	3	5
February Total		17	21	38
March	Residential	51	34	85
	Small Commercial	4	2	6
March Total		55	36	91
April	Residential	69	37	106
	Small Commercial	4	2	6
April Total		73	39	112
May	Residential	79	40	119
	Small Commercial	4	4	8
May Total		83	44	127
June	Residential	62	32	94
	Small Commercial	3	5	8
June Total		65	37	102
July	Residential	33	10	43
	Small Commercial	4	0	4
July Total		37	10	47
August	Residential	17	22	39
	Small Commercial	1	1	2
August Total		18	23	41
September	Residential	26	15	41
	Small Commercial	2	2	4
September Total		28	17	45
October	Residential	15	6	21
	Small Commercial	1	0	1
October Total		16	6	22
November	Residential	1	0	1
	Small Commercial	2	1	3
November Total		3	1	4
December	Residential	3	3	6
	Small Commercial	1	1	2
December Total		4	4	8
Grand Total		430	253	683

D. Number of disconnected customers restored to service by entering into a payment plan.

Table 19

Month	Residential	Small Commercial	Large Commercial	Total
January	2	0	0	2
February	6	0	0	6
March	12	0	0	12
April	7	1	0	8
May	10	0	0	10
June	18	2	0	20
July	3	0	0	3
August	1	0	0	1
September	3	0	0	3
October	2	0	0	2
November	1	0	0	1
December	1	0	0	1
Totals	66	3	0	69

VIII. REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES 7826.1600

Minnesota Rule 7826.1600, Reporting Service Extension Request Response Times, requires utilities to provide a report on service extension request response times. In compliance with this rule, Otter Tail provides in **Table 20** below its report of service extension request response times by customer class for each calendar month, in the following categories:

A. The number of customers requesting service to a location not previously served by Otter Tail and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

B. The number of customers requesting service to a location previously served by the utility but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.

Table 20

7826.1600 - Otter Tail Power Company Service Extension Request Response Time report - 2015

		Days	Large Commercial	Residential	Small Commercial	Grand Total
January	**Locations not previously served**	**0**	1	46	5	52
	Locations previously served	**0**	1	70	5	76
January Total			**2**	**116**	**10**	**128**
February	**Locations not previously served**	**0**		45	8	53
	Locations previously served	**0**		68	7	74
February Total				**113**	**15**	**127**
March	**Locations not previously served**	**0**		8	1	9
	Locations previously served	**(30)**		1		1
		0	1	100	20	121
March Total			**1**	**109**	**21**	**131**
April	**Locations not previously served**	**0**		11	17	28
	Locations previously served	**0**		212	46	257
April Total				**223**	**63**	**285**
May	**Locations not previously served**	**0**		14	12	25
	Locations previously served	**0**		214	38	252
		2			1	1
May Total				**228**	**51**	**278**
June	**Locations not previously served**	**(6)**			1	1
		0		22	18	36

		Days	Large Commercial	Residential	Small Commercial	Grand Total
	Locations previously served			224	19	242
		1			1	1
		10		1		1
June Total				**247**	**39**	**281**
July	**Locations not previously served**	**0**		27	10	36
	Locations previously served	**0**		189	20	209
July Total				**216**	**30**	**245**
August	**Locations not previously served**	**0**		43	10	52
	Locations previously served	**0**		195	23	218
August Total				**238**	**33**	**270**
September	**Locations not previously served**	**0**		62	9	70
	Locations previously served	**0**		136	14	150
September Total				**198**	**23**	**220**
October	**Locations not previously served**	**0**		19	17	35
	Locations previously served	**0**		147	18	165
		3		1		1
October Total				**167**	**35**	**201**
November	**Locations not previously served**	**0**		18	18	36
		4		2		2
	Locations previously served	**0**		123	13	136
November Total				**143**	**31**	**174**
December	**Locations not previously served**	**0**		18	24	42
	Locations previously served	**0**		92	7	99
December Total				**110**	**31**	**141**
Grand Total			**3**	**2,118**	**386**	**2,494**

IX. REPORTING CALL CENTER RESPONSE TIMES 7826.1700

Minnesota Rule 7826.1700, **Reporting Call Center Response Times, requires utilities to provide a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of information.** In compliance with this rule, Otter Tail provides its report of call center response times for 2015 in **Table 21**. **Figure 13** shows a historical graph showing the percent of Minnesota calls answered within 20 seconds.

Table 21

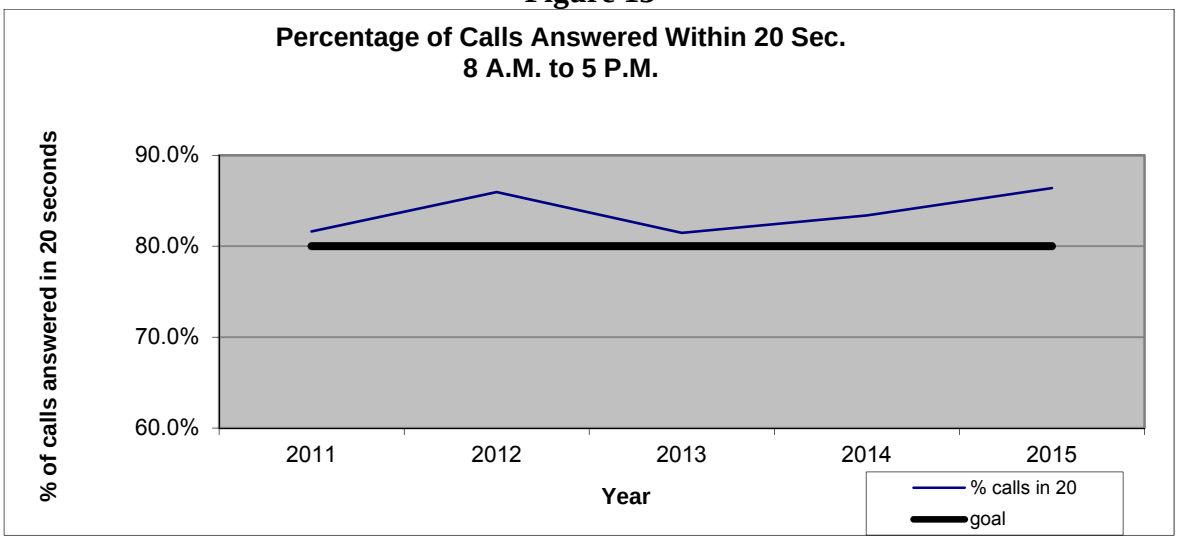
	(A)	(B)	(C)	(D)	(E)
Month	**MN Calls Offered**	**MN Calls Abandoned**	**MN Calls Answered after 20 Seconds**	**MN Calls Answered within 20 Seconds**	**MN Percent Answered within 20 seconds[1]**
January-2015	3,095	14	290	2,791	90.18%
February-2015	2,829	16	227	2,586	91.41%
March-2015	3,294	23	290	2,981	90.50%
April-2015	3,293	17	268	3,008	91.35%
May-2015	3,078	51	498	2,529	82.16%
June-2015	3,305	35	474	2,796	84.60%
July-2015	1,919	7	250	1,662	86.61%
August-2015	1,393	10	199	1,184	85.00%
September-2015	1,409	11	168	1,230	87.30%
October-2015	1,678	25	344	1,309	78.01%
November-2015	1,416	18	234	1,164	82.20%
December-2015	1,548	41	332	1,175	75.90%
Total	28,257	268	3,574	24,415	86.40%

[1]Column (D) / Column (A) = Percent answered within 20 Seconds

Beginning in 2015, Otter Tail began to see a decrease in the Minnesota customer call volume as reported by our current telecommunication call reporting software. We believe there is an issue with the collection of the call data for purposes of tracking customer calls. The Company has not been able to identify the root cause of the problem which we believe began in July of 2015. In early 2015, the Company began investigating the possibility of replacing our current telecommunications system and call reporting software. In the third quarter of 2015 the project was approved to move forward in 2016. We anticipate the new system will be installed and functional by the end of 2016. During the implementation of the new telecommunication system, we will be working with the vendor on ways to accurately collect and report on customer calls made to Otter Tail.

Otter Tail operates a call center using agents located in 10 office locations across our entire service territory. Agents in these office locations answer calls from our Minnesota, North Dakota and South Dakota customers. We have not received customer complaints related to not being able to reach an Otter Tail agent.

Figure 13



X. REPORTING EMERGENCY MEDICAL ACCOUNT STATUS 7826.1800

Minnesota Rule 7826.1800, Reporting Emergency Medical Account Status, requires utilities to provide a report that includes the number of customers who requested emergency medical account status under Minnesota Statutes, section 216B.098 subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reason for each denial. In compliance with this rule, Otter Tail reports that during 2015, Otter Tail had 23 Minnesota customers request emergency medical account status. Otter Tail granted this status to all 23 customers.

XI. REPORTING CUSTOMER DEPOSITS 7826.1900

Minnesota Rule 7826.1900, Reporting Customer Deposits, requires utilities to provide a report on the number of customers who were required to make a deposit as a condition of receiving service. In compliance with this rule, Otter Tail reports that 597 customers were required to make a deposit as a condition of receiving service during 2015. The number of deposit requests decreased by 186 when compared to 2014.

XII. REPORTING CUSTOMER COMPLAINTS 7826.2000

Minnesota Rule 7826.2000, Reporting Customer Complaints, requires utilities to provide a detailed report on complaints by customer class and calendar month. In compliance with this rule, Otter Tail provides the following information on complaints the Company received during 2015.

A & B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of the customer complaints.

Table 22

Complaint Type	Total	Percent of Total
Alleged billing errors	19	22%
Inaccurate metering	6	7%
Wrongful disconnection	0	0%
High bills	19	22%
Inadequate Service	4	5%
Service extension	1	1%
Service restoration	0	0%
Other	37	43%
	86	100%

*Other – this category contains any complaints not included within the various complaint sections in our Customer Information System. The types of complaints included in the "Other" category include such things as property damage, tree trimming, and third party meter readers.

C. The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.

Table 23

2015		
Resolved by	Total	Percentage
(1) Resolved on Initial Inquiry	66	76.74%
(2) Resolved within 10 days	14	16.28%
(3) Resolved in greater than 10 days	6	6.98%
Grand Total	86	100.00%

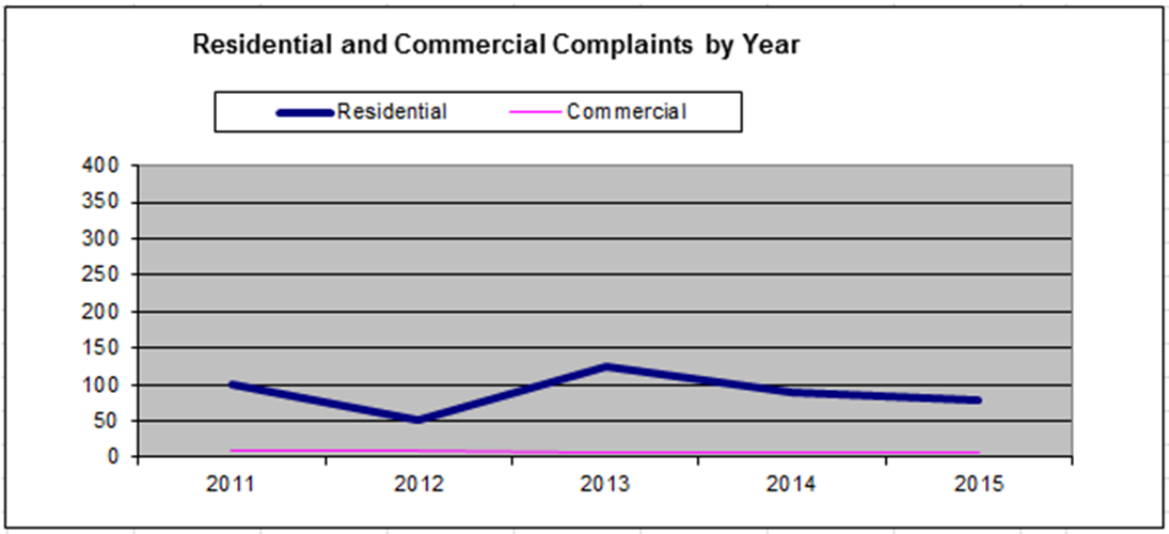
D. The number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise, (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility or (4) refusing to take the action the customer requested.

Table 24

Action Taken	Total	Percentage
(1) Took action the Customer requested	20	23.26%
(2) Provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of Otter Tail	23	26.74%
(3) Took an action the customer and the utility agree is an acceptable compromise	23	26.74%
(4) Refused to take action the customer requested	20	23.26%
Grand Total	86	100.00%

Figure 14 below is a graph showing complaints by customer class for the previous five years.

Figure 14



E. The number of complaints forwarded to the utility by the Commission's Customer Affairs Office for further investigation and action.

Otter Tail received four customer complaints in 2015 that were forwarded from the Commission's Consumer Affairs Office, all of which have been resolved. The number of complaints received in 2015 decreased by two when compared to 2014.

From: Fyhrie, Jessica
To: staff, cao (PUC) (consumer.puc@state.mn.us)
Cc: Regulatory
Subject: Otter Tail Power Comapany Major Service Interruption Report - Fergus Falls
Date: Monday, January 19, 2015 9:41:35 AM

Date: Saturday, January 17, 2015

From: 12:27:31 Pm to 1:36:32 am (Total Outage time: 01:09:15)

Location: City of Fergus Falls, MN - Northeast Feeder serving our Hospital and business area

Customer Count: 787

Cause: Bad underground

Thanks!!
Jess

Jessica Fyhrie | Otter Tail Power Company
Regulatory Compliance Specialist
(218) 739-8395
jfyhrie@otpco.com

From: Fyhrie, Jessica
To: staff, cao (PUC) (consumer.puc@state.mn.us)
Cc: Regulatory
Subject: Otter Tail Power Comapany Major Service Interruption Report - Wheaton, MN
Date: Wednesday, April 29, 2015 12:40:42 PM

Date: Tuesday, April 28, 2015

From: 4:35 pm to 5:46 pm

Location: Transmission Line from Fairmont, ND to Graceville, MN. Affecting the city of Wheaton, MN.

Customer Count: 628 customers

Cause: Otter Tail employees patrolled line however, they were unable to identify the cause.

Thanks!!
Jess

Jessica Fyhrie | Otter Tail Power Company
Regulatory Compliance Specialist
(218) 739-8395
jfyhrie@otpco.com

From: Kremeier, Collin
To: consumer.puc@state.mn.us
Cc: Regulatory
Subject: Major Interruption Morris MN 5-17-15
Date: Monday, May 18, 2015 8:55:03 AM

Good Evening,
We did experience an outage in Morris MN on 5-17-15. Below are the details surrounding the outage.

Interruption Time: 18:55
Cause: a bad insulator. This caused two phases to drop to the ground.
Customers affected: 770
Duration of Interruption: 1hr and 20 minutes

Thank you
Collin

Collin Kremeier
Manager, Customer Service | Otter Tail Power Company
Milbank/Morris CSC
e-mail ckremeier@otpco.com
Phone 1-800-346-4920 ext 8502
Fax 320-589-4389

From: Olson, Wendi
To: consumer.puc@state.mn.us
Cc: Regulatory
Subject: Outage - East of Otter Tail MN 7-10-15
Date: Tuesday, July 14, 2015 1:11:55 PM

Good Morning,

Below are the details surrounding the outage that we experienced on July 10, 2015.

Location: East of Ottertail, MN on Hwy 127
Date: July 10, 2015
Interruption time 5:49 PM to 7:22 PM
Cause: Some equipment hooked OH line breaking it.
Customers Affected: 549
Duration of outage: one hour-32 minutes-35 seconds

Thank you,
Wendi

Wendi A. Olson

Regulatory Filing Coordinator
Regulatory Affairs and Compliance
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
Phone: 218-739-8699 Fax 218-739-8032
wolson@otpco.com

From: Fyhrie, Jessica
To: staff, cao (PUC)
Cc: Regulatory
Subject: Otter Tail Power Comapany Major Service Interruption Report - Crookston, MN
Date: Friday, July 24, 2015 10:01:30 AM

Location: Crookston MN
Date: July 24, 2015
Interruption time: 2:24am
Cause: Significant weather event caused jumpers to burn up
Customers Affected: 570
Duration of outage: 2 hours and 7 minutes

Please let me know if you have any questions or concerns.
Thanks!!
Jess

Jessica Fyhrie | Otter Tail Power Company
Regulatory Compliance Specialist
(218) 739-8395
jfyhrie@otpco.com

From:	Fyhrie, Jessica
To:	Regulatory
Cc:	Erstad, Sue; Van Voorhis, Mike
Subject:	FW: Otter Tail Power Comapany Major Service Interruption Report - Ottertail, MN
Date:	Friday, August 14, 2015 10:53:23 AM

From: Fyhrie, Jessica
Sent: Friday, August 14, 2015 10:53 AM
To: staff, cao (PUC)
Subject: Otter Tail Power Comapany Major Service Interruption Report - Ottertail, MN

Location: Ottertail, MN - Customers going East along Hwy 78 to Balmoral Golf Course & rural customers North of Battle Lake.

Date: August 14, 2015

Cause: Bad Underground (We did some switching to get customers back on and are repairing underground at this time).

Customers affected: 672

Duration: 2 hours and 5 minutes (4:02 am to 6:07 am)

Please let me know if you have any questions or concerns.
Thanks!!
Jess

Jessica Fyhrie | Otter Tail Power Company
Regulatory Compliance Specialist
(218) 739-8395
jfyhrie@otpco.com

From: Fyhrie, Jessica
To: staff, cao (PUC)
Cc: Regulatory
Subject: Otter Tail Power Comapany Major Service Interruption Report - Appleton, MN
Date: Monday, September 21, 2015 9:38:58 AM

Location: Appleton, MN

Feeder: North Herring and East Theilke Subfeeders

Date: September 21, 2015

Cause: Faulted 500MCM underground conductor.

Customers affected: 584

Duration: 1 hour 39 minutes

Please let me know if you have any questions or concerns.
Thanks!!
Jess

Jessica Fyhrie | Otter Tail Power Company
Regulatory Compliance Specialist
(218) 739-8395
jfyhrie@otpco.com

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company 2015 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2016
Docket No. E017/M-16-___

I, Nancy Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf 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
Annual Report

Dated this **1st** day of **April**, **2016**

/s/ NANCY OLSON
Nancy Olson
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8376

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Otter Tail Power Company_Safety Reliability and Service Quality Report Filing Service List