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

February 3, 2015



Mr. 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 the Petition of Otter Tail Power Company for Approval of a Transmission Cost Recovery Rider Annual Adjustment Docket No. E017/M-14-375
Supplemental Filing – Rates Recalculation

Dear Mr. Wolf:

Enclosed for filing in the above-referenced matter is Otter Tail Power Company's ("Otter Tail") Supplemental Filing addressing a rate recalculation proposal for consideration in Otter Tail's Transmission Cost Recovery Rider.

Otter Tail has electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General-Antitrust & Utilities Division. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpco.com.

Sincerely,

/S/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration

nlo
Enclosures
By electronic filing
c: Service List



STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of the Petition of Otter Tail Power Company for Approval of a Transmission Cost Recovery Rider Annual Adjustment Docket No. E017/M-14-375

OTTER TAIL POWER COMPANY'S SUPPLEMENTAL FILING -RATES RECALCULATION

I. INTRODUCTION

In the September 24, 2014 Response Comments filed by the Department of Commerce, Division of Energy Resources ("Department") in the above—captioned matter, the Department's recommendations included, among other things, support of Otter Tail's request to recalculate Transmission Cost Recovery ("TCR") Rider rates for the remaining recovery period to fully collect the revenue requirement and prior period under-recovery amounts by the end of June 2015. This request was made to allow Otter Tail to reduce its TCR tracker balance closer to zero. All other matters within this Docket have been resolved between Otter Tail and the Department.

Otter Tail's TCR is now scheduled for Minnesota Public Utility Commission ("Commission") action on February 12, 2015. As a result, Otter Tail requests the effective date for a new rate implementation to be March 1, 2015. Only four months remain in the current recovery period (March 2015 to June 2015). Otter Tail projects the under-recovery amount at the end of February 2015 in the TCR tracker will be over \$3.9 million. While Otter Tail desires to reduce its under-recovery balance to near zero as quickly as possible, Otter Tail recognizes that implementing rates to collect the under-recovery amounts in a four month period would result in a very high rate.

Over the last few days, Otter Tail staff and Department staff have discussed different alternatives for recalculating Otter Tail's TCR rates to allow for a longer period of time to reduce the under-collection balance closer to zero. This filing outlines a proposal that the Department and Otter Tail staff have discussed and agreed to, that would bring Otter Tail's collection of current and prior period under- recovery closer to zero by the end of 2015. Otter Tail has also discussed this proposal with Commission staff.

II. RATE RECALCULATION BACKGROUND

At the time of the initial filing in this Docket (May 1, 2014), Otter Tail had a projected \$2 million under-recovery balance as of June 30, 2014 in its TCR tracker. This true-up balance applied to prior periods ending June 30, 2014. Otter Tail's proposed rates in the initial filing contemplated a July 1, 2014 effective date that would have recovered the revenue requirements for the July 2014 to June 2015 time frame as well as the \$2 million under-recovery balance for the prior period true-up. Otter Tail also requested in its initial filing that if the ultimate effective date for this rate update was more than 45 days later than July 1, 2014, that Otter Tail be allowed to recalculate the TCR rates in order to recover all approved costs over the remainder of the recovery period.

The anticipated effective date for this update is now expected to be March 1, 2015. While Otter Tail desires to reduce its tracker balance to zero as soon as reasonably possible, Otter Tail believes it not reasonably possible to do so over the remaining four months of the current recovery period. As a result, Otter Tail and the Department discussed alternatives and have agreed that the rate recalculation solution outlined in this filing allows Otter Tail to implement rates that will allow Otter Tail to reduce the under-recovery balance closer to zero over a somewhat longer time frame. While this is not ideal, as Otter Tail will be carrying an under recovered balance, it appears under the circumstances to be the best way to move forward to reduce the balance. Otter Tail and the Department have also discussed the expectation that the next rate adjustment will result in a reduction in the TCR rates to a more stable level going forward.

Extend Revenue Requirement and Recovery Period to December 2015

The rate recalculation proposal which the Department and Otter Tail have agreed to is for Otter Tail to calculate rates that go into effect March 1, 2015 and which will collect the projected revenue requirements and under collection balances through an extended collection period running through December 2015.

The following table summarizes various rates applicable to this Docket, including the current rates in effect today, the proposed rates included in the initial filing, and three additional recalculation scenarios, including the rates calculated under the proposal which Otter Tail and the Department have agreed to (Column D). Immediately after the table is a more detailed description of each of the rate scenarios represented in the table.

				Recalculation Scenarios				
		Α	В	С	D	E		
				ORIGINAL COSTS	ORIGINAL COSTS	UPDATED COSTS		
			Original Rates	& REVENUES	& REVENUES	& REVENUES		
		Current Rates	Proposed in Initial	Full Recovery by	Full Recovery by	Full Recovery by		
		Effective	Filing	June 2015	December 2015	December 2015		
		April 2012	Jul 2014 - Jun 2015	(Mar 1-Jun 30, 2015)	(Mar 1-Dec 31, 2015)	(Mar 1-Dec 31,		
CUSTOMER CLASS		Rate per Unit	Rate per Unit	Rate per Unit	Rate per Unit	2015) Rate per Unit		
Large General Service	(\$ / kW)	\$ 0.391	\$ 1.458	\$ 3.567	\$ 2.058	\$ 2.413		
Controlled Service	(cents / kWh)	0.019¢	0.069¢	0.161¢	0.122¢	0.143¢		
Lighting	(cents / kWh)	0.085¢	0.292¢	0.703¢	0.420¢	0.493¢		
All other service	(cents / kWh)	0.126¢	0.434¢	1.107¢	0.643¢	0.753¢		

Column A: This column reflects the current rates in effect today. These rates have been in effect since April 1, 2012.

Column B: This column reflects the proposed rates calculated in the initial filing submitted May 1, 2014 for the July 2014 – June 2015 recovery period. These rates included an approximately \$2 million prior period under-recovery or true-up amount at the end of June 2014. Column C: This column reflects the rates that would be required as of March 1, 2015, to collect the revenue requirement proposed in the initial filing and current estimated under collection balance at the end of February 2015, over the final four months (Mar – Jun 2015) of the recovery period proposed in the initial filing. The current estimated under-recovery at the end of February 2015 is forecasted to be approximately \$3.93 million (Appendix 1 - Attachment 4, page 2 of 3, line 25). This scenario assumes original costs and revenues as submitted in the initial filing; actual collections received under current rates through December 31, 2014; and the use of a four month collection period (Mar – Jun 2015). Otter Tail does not prefer this option due to the resulting high rates that would be imposed over such a short period.

Column D (Proposed Rates): This column reflects recalculated rates to be implemented on March 1, 2015 to obtain full recovery of revenue requirement and under collection balances through an extended collection period ending December 2015. The costs, expenses and revenue credits within the tracker are based on costs, expenses and revenue credits known at the time of the original filing. Appendix 1 (Updated Attachment 4 from the Initial Filing) is the initial TCR tracker submitted in the initial filing, updated for the following items:

- 1. <u>Actual collections</u> from existing rates are included through December 2014 as reflected on line 21 of the tracker.
- Six more months of additional Revenue Requirements for July 2015 December 2015 have been included. These revenue requirements are based on information that was available at the time of the initial filing for the existing projects within the TCR.

Monthly revenue requirements from July 2015 – December 2015 are in-line with revenue requirement amounts from the first six months of 2015. No new projects are added into the TCR during this time-frame.

The rates calculated under this modified approach collect the projected \$3.9 million of under-recovery as of February 2015 and the remaining revenue requirements for the March 2015 – December 2015 recovery period. Line 25 in Appendix 1 shows the tracker balance being reduced to zero as of December 2015 based on the information included. The recalculation methodology and the associated rates reflected in Column D above, represent the scenario which Otter Tail and Department staff have discussed and recommend Commission approval of at this time.

Column E: As noted in the narrative above for Column D rates, the proposed rates are based on information that was submitted and available at the time of the initial filing. If Otter Tail were to submit an update to all costs, expenses, and projected revenues known as of December 31, 2014, and compute rates for a recovery period from March 1, 2015 extended out through December 2015, (Similar methodology as Column D but using current cost, expense and revenue information), the rates reflected in Column E of the table above would need to be implemented to reduce the current and projected balance to zero. These rates are significantly higher than what Otter Tail is proposing. Otter Tail still estimates a potential under collection of \$1.45 million as of December 31, 2015 because the rates calculated in Column D are not based on the most current information. However, because submitting all schedules with updated information would likely cause further delay in bringing this matter before the Commission, due to additional reviews by Department and PUC staff, Otter Tail's recommendation of implementing the recalculated rates reflected in Column D, based on information provided and available at the time of the initial filing, as outlined above, remains the most reasonable and timely option at this time.

III. CUSTOMER IMPACT ON PROPOSED RATES

Following approval, Otter Tail proposes final rates to be implemented on bills rendered on and after March 1, 2015. The proposed rates, as described above, are designed to recover TCR rider revenue requirements through December 2015, as reflected in the schedules provided in Appendix 1. These rates will remain in effect until the Commission approves Otter Tail's next TCR rate update. The following table reflects the projected revenue requirement and associated rates by customer class.

Line					Rate per	
No.	Class		Units		Unit	Amount
1 2 3	Large General Service	(a) (b)	1,863,956 121,989,880		\$2.058 0.122¢	\$3,836,725 \$149,271
4 5 6	Lighting	(c)	16,070,645		0.420¢	\$67,543
7 8	All other service		674,517,893	kWh	0.643¢	\$4,334,287
9	Total revenue					\$8,387,827

The following table shows the estimated monthly rate impact by retail customer class.

Rate Impact												
		Average	Current	Proposed	Change	Bill						
	Customers	kW/kWh	Rate	Rate	in Rate	Impact						
Large General Service (kW)	569	327	\$0.391	2.058	1.667	\$545.17						
Controlled Service (kWh)	16,837	905	0.019 ø	0.122	0.103	\$0.94						
Lighting (kWh)	2,686	609	0.085 ø	0.420	0.335	\$2.04						
All Other Service (kWh)	61,931	1,142	0.126 ø	0.643	0.516	\$5.90						

The above rates are based on a March 1, 2015 effective date.

IV. NEXT TCR UPDATE

Assuming Commission approval of the proposed rates outlined above in this Docket, Otter Tail would look to file its next annual update to the TCR by October 1, 2015. In that filing, Otter Tail would include all updated actual cost, expense, and revenue information for the current projects within the TCR as well as updated forecast information up to and through the

next collection period. In that filing, Otter Tail would propose an effective date for the next rate adjustment to correspond to the month in which the updated TCR tracker balance at that time is expected to be reduced to near zero.

V. CONCLUSION

Otter Tail respectfully requests Commission approval of its 2014 TCR Rider update, based on the updated rate recalculation framework and associated revenue requirements outlined above, as agreed to between Otter Tail and the Department. Otter Tail recommends a March 1, 2015 effective date for the new rates.

Dated: February 3, 2015 Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /S/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537
(218) 739-8279
stommerdahl@otpco.com

Appendix 1 to E017/M-14-375

		2013	2013	2013	2013	2013	2013	2013	2013	2013	2014	2014	2014	2014	
	TRACKER SUMMARY	May	June	July	August	September	October	November	December	YE	January	February	March	April	Recovery
Line															Period
No.	Requirements Compared to Billed:	Actual	Actual	Actual	Actual*	Projected	Ending								
	Revenue Requirements														
1	CAPX 2020 Fargo	215,690	215,690	215,690	215,690	215,690	215,690	215,210	238,818	2,610,925	413,330	414,383	378,548	375,674	3,330,101
2	CAPX 2020 Bemidji	87,155	87,155	87,155	87,155	87,155	87,155	87,155	112,237	1,070,946	77,409	78,011	55,270	46,076	979,090
3	CAPX 2020 Cass Lake - Bemidji	39,404	39,404	39,404	39,391	39,360	39,360	39,360	39,360	470,135	30,770	30,770	30,770	29,463	436,815
4	CAPX 2020 Brookings	63,630	63,630	63,630	63,630	63,630	63,630	63,630	63,630	763,565	109,748	109,748	109,748	120,054	958,343
5	Ramsey 230/115 kW Transformer Upgrade	2,469	2,469	2,240	2,167	2,167	2,167	2,167	2,167	27,892	2,333	2,333	2,333	2,333	27,346
6	Total Revenue Regirements	408,349	408,349	408,119	408,034	408,002	408,002	407,523	456,212	4,943,463	633,590	635,245	576,669	573,601	5,731,695
7															
8	MISO Expenses														
9	MISO Schedule 26 Expense	339,575	301,556	358,709	374,604	383,499	361,674	355,287	382,322	4,410,626	453,445	568,705	519,261	481,172	4,879,809
10	MISO Schedule 26A Expense	18,071	21,860	27,584	33,062	29,469	24,482	32,220	34,679	298,572	39,096	92,364	80,201	54,240	487,327
11	Total MISO Expenses	357,645	323,415	386,293	407,666	412,969	386,156	387,507	417,001	4,709,198	492,541	661,070	599,461	535,411	5,367,136
12															
13	MISO Revenues														
14	MISO Schedule 26 Revenue	(416,210)	(483,506)	(546,414)	(643,846)	(623,513)	(591,919)	(458,036)	(449,013)	(5,928,906)	(504,891)	(545,991)	(474,160)	(586,261)	(6,323,759)
15	MISO Schedule 37 & 38 Revenue	(14,062)	(14,062)	(14,500)	(14,501)	(14,501)	(14,501)	(14,501)	(14,500)	(167,237)	(14,500)	(14,849)	(14,849)	(20,261)	(179,585)
16	MISO Schedule 26A Revenue	(61,640)	(69,606)	(76,567)	(90,635)	(78,761)	(67,233)	(65,372)	(65,963)	(803,420)	(71,394)	(124,370)	(111,680)	(117,935)	(1,001,155)
17	Total MISO Revenues	(491,912)	(567,174)	(637,481)	(748,982)	(716,774)	(673,653)	(537,908)	(529,476)	(6,899,563)	(590,785)	(685,210)	(600,689)	(724,456)	(7,504,500)
18															
19	Net Revenue Requirement	274,083	164,590	156,931	66,717	104,197	120,506	257,121	343,737	2,753,098	535,346	611,105	575,441	384,556	3,594,331
20															
21	Billed (forecast kWh x adj factor) (Actuals thru Dec. 2014)	157,284	150,468	166,468	165,594	170,215	154,966	173,889	192,450	2,068,544	212,065	203,811	188,171	174,173	2,109,555
22	.,,,	,	,	,			,,,,,,	.,		,,.	,	,.	,		,,
	Monthly Revenue Difference	116,798	14.122	(9,537)	(98,877)	(66,018)	(34,460)	83,232	151.287	684,555	323,281	407.294	387.270	210.383	1,484,776
24	Carrying Charge	366	1.206	1.316	1.257	557	87	(160)	437	(2.739)	1.525	3,856	0	0	0
25	Life-to-Date Revenue Requirement (Cumulative Difference)	168,104	183,433	175,212	77.592	12.131	(22,242)	60,831	212.554	681,816	537,361	948,511	1,335,781	1.546.164	1.484.776
26		,	,		,	,	(==,=:=/	,					.,,.	.,,	.,
27	Carrying Charge Calculation	1,206	1.316	1.257	557	87	(160)	437	1,525		3,856	0	0	0	
28	Cumulative Carrying Charge	39,396	40,712	41,969	42,526	42,613	42,453	42,890	44,415		48,271	48,271	0	0	
29	Carrying cost	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%		8.61%	0.00%	0.00%	0.00%	
30		3.5 . 70	0.0.70	0.0 . 70	3.5170	3.5.70	3.5170	3.5170	3.5170		0.0170	0.0070	0.0070	0.0070	
31															
32	Forecasted Sales (MWh)												192.865	175.706	368,571
52	. 0.000000 00100 (1919911)												102,000	170,700	555,571
												ningt Davanua D			

*March 2014 Project Revenue Requirements are Projected

		2014	2014	2014	2014	2014	2014	2014	2014	2014	2015	2015
	TRACKER SUMMARY	May	June	July	August	September	October	November	December	YE	January	February
Line												
No.	Requirements Compared to Billed:	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected
	Revenue Requirements											
1	CAPX 2020 Fargo	375,706	396,038	396,360	396,736	396,786	396,818	396,921	396,968	4,734,269	476,513	476,513
2	CAPX 2020 Bemidji	46,186	46,186	46,186	46,186	46,186	46,186	46,186	46,186	626,254	28,397	28,397
3	CAPX 2020 Cass Lake - Bemidji	29,463	29,463	29,463	29,463	29,463	29,463	29,463	29,463	357,480	25,394	25,394
4	CAPX 2020 Brookings	120,160	121,948	122,004	122,033	122,072	122,126	122,191	122,209	1,424,043	142,022	146,866
5	Ramsey 230/115 kW Transformer Upgrade	2,333	2,333	2,333	2,333	2,333	2,333	2,333	2,333	27,992	2,248	2,248
6	Total Revenue Regirements	573,849	595,968	596,346	596,751	596,839	596,926	597,094	597,159	7,170,038	674,573	679,417
7												
8	MISO Expenses											
9	MISO Schedule 26 Expense	481,172	481,172	481,172	481,172	481,172	481,172	481,172	481,172	5,871,956	481,172	522,119
10	MISO Schedule 26A Expense	49,846	49,464	53,572	54,037	51,418	54,861	62,922	71,358	713,379	127,183	127,337
11	Total MISO Expenses	531,018	530,636	534,744	535,209	532,590	536,033	544,093	552,529	6,585,335	608,355	649,456
12												
13	MISO Revenues											
14	MISO Schedule 26 Revenue	(586,261)	(586,261)	(586,261)	(586,261)	(586,261)	(586,261)	(586,261)	(586,261)	(6,801,388)	(496,355)	(653,200)
15	MISO Schedule 37 & 38 Revenue	(20,261)	(20,261)	(20,261)	(20,261)	(20,261)	(20,261)	(20,261)	(20,261)	(226,545)	(17,350)	(23,342)
16	MISO Schedule 26A Revenue	(122,258)	(122,258)	(122,258)	(122,258)	(122,258)	(122,258)	(122,258)	(182,551)	(1,463,734)	(203,546)	(203,546)
17	Total MISO Revenues	(728,779)	(728,779)	(728,779)	(728,779)	(728,779)	(728,779)	(728,779)	(789,073)	(8,491,666)	(717,250)	(880,087)
18												
19	Net Revenue Requirement	376,087	397,825	402,310	403,181	400,650	404,180	412,409	360,616	5,263,707	565,678	448,786
20												
21	Billed (forecast kWh x adj factor) (Actuals thru Dec. 2014)	157.581	158.316	165.482	168,426	164.007	163.877	171.990	188.095	2.115.994	227.501	224,356
22	Dinou (10100000; NVIII X day (00001) (1000000 tilla 200; 2011)	101,001	100,010	100,102	100,120	101,001	100,011	11 1,000	100,000	2,110,001	227,001	22 1,000
23	Monthly Revenue Difference	218,506	239,509	236.828	234.755	236.643	240.303	240.419	172,521	3.147.713	338,176	224,431
24	Carrying Charge	210,000	200,000	0	0	200,040	240,000	0	172,021	0,147,710	0	0
25	Life-to-Date Revenue Requirement (Cumulative Difference)	1.764.670	2.004.179	2,241,007	2,475,762	2.712.405	2.952.708	3.193.127	3,365,648	3,147,713	3.703.825	3,928,255
26	Eno to Bato Novonao Noquiromoni (oumaiativo Binoronoo)	1,701,070	2,001,110	2,211,001	2,110,102	2,7 12,100	2,002,100	0,100,127	0,000,010	0,111,110	0,700,020	0,020,200
27	Carrying Charge Calculation	0	0	0	0	0	0	0	0		0	0
28	Cumulative Carrying Charge	0	0	0	0	ő	0	0	0		0	0
29	Carrying cost	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%
30	Carrying Cost	0.0078	0.0078	0.0070	0.0076	0.0070	0.0070	0.0070	0.0070		0.0078	0.0070
31												
32	Forecasted Sales (MWh)	158,873	157,400	167,087	176,920	174,704	163,847	183,894	204,315	1,755,612	228,250	225,094
32	i diecasted dales (ivivvii)	130,073	137,400	107,067	170,920	174,704	103,047	103,094	204,313	1,735,612	220,230	223,094

		2015	2015	2015	2015		2015	2015	2015	2015	2015	2015	2015
	TRACKER SUMMARY	March	April	May	June	Recovery	July	August	September	October	November	December	YE
Line						Period							
No.	Requirements Compared to Billed:	Projected	Projected	Projected	Projected	Ending	Projected	Projected	Projected	Projected	Projected	Projected	Projected
	Revenue Requirements												
1	CAPX 2020 Fargo	476,513	476,513	476,513	512,476	5,275,631	512,645	512,838	512,974	512,993	512,993	512,993	5,019,450
2	CAPX 2020 Bemidji	28,397	28,397	28,397	28,397	447,497	28,397	28,397	28,397	28,397	28,397	28,397	283,967
3	CAPX 2020 Cass Lake - Bemidji	25,394	25,394	25,394	25,394	329,142	25,394	25,394	25,394	25,394	25,394	25,394	253,936
4	CAPX 2020 Brookings	147,466	147,542	149,538	149,569	1,615,638	149,617	149,669	149,754	149,853	150,019	150,093	1,493,119
5	Ramsey 230/115 kW Transformer Upgrade	2,248	2,248	2,248	2,248	27,481	2,248	2,248	2,248	2,248	2,248	2,248	22,476
6	Total Revenue Regirements	680,017	680,093	682,089	718,083	7,695,389	718,301	718,544	718,766	718,883	719,049	719,124	7,072,948
7													
	MISO Expenses												
9	MISO Schedule 26 Expense	522,119	522,119	522,119	522,119	5,978,798	522,119	522,119	522,119	522,119	522,119	522,119	5,221,192
10	MISO Schedule 26A Expense	113,237	105,304	90,981	90,209	1,002,418	97,745	100,818	98,248	93,524	107,127	118,985	1,016,177
	Total MISO Expenses	635,356	627,423	613,100	612,328	6,981,215	619,864	622,937	620,368	615,643	629,246	641,105	6,237,369
12													
	MISO Revenues												
14	MISO Schedule 26 Revenue	(640,871)	(660,111)	(660,111)	(660,111)	(7,288,323)	(660,111)	(660,111)	(660,111)	(660,111)	(660,111)	(660,111)	(6,581,872)
15	MISO Schedule 37 & 38 Revenue	(23,342)	(23,342)	(23,342)	(23,342)	(255,623)	(23,342)	(23,342)	(23,342)	(23,342)	(23,342)	(23,342)	(233,418)
16	MISO Schedule 26A Revenue	(203,546)	(203,546)	(203,546)	(203,546)	(2,015,113)	(203,546)	(203,546)	(203,546)	(203,546)	(203,546)	(203,546)	(2,035,456)
17	Total MISO Revenues	(867,759)	(886,999)	(886,999)	(886,999)	(9,559,060)	(886,999)	(886,999)	(886,999)	(886,999)	(886,999)	(886,999)	(8,850,746)
18													
19	Net Revenue Requirement	447,614	420,517	408,190	443,412	5,117,544	451,166	454,483	452,135	447,528	461,296	473,230	4,459,572
20													
21	Billed (forecast kWh x adj factor) (Actuals thru Dec. 2014)	902,267	822,105	746,720	739,470		785,764	872,815	864,417	810,564	874,424	969,279	8,387,827
22	, , , , , , , , , , , , , , , , , , , ,												
23	Monthly Revenue Difference	(454,653)	(401,588)	(338,529)	(296,058)	433.247	(334,599)	(418,332)	(412,283)	(363,036)	(413,128)	(496,050)	(3,928,255)
	Carrying Charge	0	0	0	0	,	0	0	0	0	0	0	0
25	Life-to-Date Revenue Requirement (Cumulative Difference)	3,473,602	3.072.014	2.733.485	2.437.427		2.102.828	1.684.496	1.272.213	909.178	496.050	(0)	(3.928.255)
26		., .,			, ,		, , , , , , , , , , , , , , , , , , , ,	, , , , , , , , , , , , , , , , , , , ,				, ,	.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,
	Carrying Charge Calculation	0	0	0	0		0	0	0	0	0	0	
	Cumulative Carrying Charge	0	0	0	0		0	0	0	0	0	0	
	Carrying cost	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
30	, , , , , , , ,												
31													
	Forecasted Sales (MWh)	204.384	186,226	169,149	167.507	2.251.378	177.993	197.712	195.810	183.611	198.077	219.564	1.900.033
1	,	,	,	,	,	, - 1,-1	.,		,	,	, , , , , ,	,	,,

Initial Filing Revenue Requirement	E017/M-14-375
SUMMARY	July 2014 - June 2015
Revenue requirements Carrying Charge (Ended 2/1/14 per Orders True-up as of June 2014	\$5,117,544) 0 2,003,884
Total requirements	\$7,121,429
July 2014 - June 2015 projected sales in mWh	2,251,378
Average Rate	\$0.00316

Supplemental Filing	E017/M-14-375	
SUMMARY		Mar 2015 - Dec 2015
Revenue requirements Carrying Charge True-up as of February 201 Total requirements	5 _	\$4,459,572 0 3,928,255 \$8,387,827
Mar 2015 - Dec 2015 projected Average Rate	I sales in mWh	1,900,033 \$0.00441

CERTIFICATE OF SERVICE

RE: In the Matter of the Petition of Otter Tail Power Company for Approval of a Transmission Cost Recovery Rider Annual Adjustment MPUC Docket No. E017/M-14-375
Supplemental Filing – Rates Recalculation

I, Nancy L. 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 Petition

Dated this 3rd day of February, 2015.

/S/ NANCY L. OLSON

Nancy L. 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	OFF_SL_14-375_M-14-375
Julia	Anderson	Julia.Anderson@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_14-375_M-14-375
Michael	Bradley	mike.bradley@lawmoss.co m	Moss & Barnett	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-375_M-14-375
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_14-375_M-14-375
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_14-375_M-14-375
Sharon	Ferguson	sharon.ferguson@state.mn .us	Department of Commerce	85 7th Place E Ste 500 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_14-375_M-14-375
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_14-375_M-14-375
Shane	Henriksen	shane.henriksen@enbridge .com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_14-375_M-14-375
James D.	Larson	james.larson@avantenergy .com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-375_M-14-375
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_14-375_M-14-375
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	Yes	OFF_SL_14-375_M-14-375

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_14-375_M-14-375
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-375_M-14-375
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_14-375_M-14-375
Debra	Opatz	dopatz@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14-375_M-14-375
David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380496	Electronic Service treet	No	OFF_SL_14-375_M-14-375
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_14-375_M-14-375
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_14-375_M-14-375
Daniel	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	Suite 350 121 7th Place East St. Paul, MN 551022147	Electronic Service	Yes	OFF_SL_14-375_M-14-375