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June 24, 2019

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

**RE: In the Matter of Otter Tail Power Company's 2018 Demand Side Management  
Financial Incentive Project and Annual Filing to Update the Conservation  
Improvement Project Rider  
Docket No. E017/M-19-256  
REPLY COMMENTS**

Dear Mr. Wolf:

The Minnesota Department of Commerce Staff (Department) filed response comments on May 31, 2019. Otter Tail provides the following Reply Comments to the Department, responding to the Department's request for additional CIP tracker account information, carrying charge calculation, and recommended adjustments to Otter Tail's requested financial incentive amount.

Please feel free to contact me at 218-739-8639 or [jgrenier@otpco.com](mailto:jgrenier@otpco.com) with any questions.

Sincerely,

*/s/ JASON GRENIER*  
Jason Grenier, Manager  
Market Planning

mmo  
Enclosures  
By electronic filing  
C: Service List

**OTTER TAIL POWER COMPANY REPLY COMMENTS  
TO THE MINNESOTA PUBLIC UTILITIES COMMISSION**

**REGARDING OTTER TAIL POWER COMPANY'S 2018 DEMAND SIDE  
MANAGEMENT FINANCIAL INCENTIVE PROJECT AND ANNUAL FILING TO  
UPDATE THE CONSERVATION IMPROVEMENT PROJECT RIDER**

**DOCKET NO. E017/M-19-256  
June 24, 2019**

**I. BACKGROUND**

Otter Tail Power Company (Otter Tail or the Company) respectfully responds to the Minnesota Department of Commerce, Division of Energy Resources (Department or Staff) Response Comments in Otter Tail's 2018 Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Program (CIP) Rider.

Otter Tail appreciates the Department's recognition of Otter Tail's strong 2018 CIP achievements. The Company achieved a Minnesota record 4.03 percent energy savings while maintaining a cost-effective portfolio of programs as well as keeping spending per kWh saved at or below historic levels.

The main point of disagreement between Otter Tail and the Department is if expenses from Company-owned projects should be included in the utility financial performance incentive. The Company's comments below support why these expenses should be eligible towards the calculation of the performance incentive. Next the Company requests the Commission to provide an exemption to Otter Tail from the financial performance mechanisms spending cap provision. Lastly, the Company will discuss several small adjustments to the 2017 CIP tracker account.

The Company requests the implementation of the Conservation Cost Recovery Adjustment (CCRA) factor of \$0.00710/kWh reflected on customers' bills through the Resource Adjustment starting with bills rendered on and after October 1, 2019, but plans to file an updated CCRA rate once the Minnesota Public Utility Commission (MPUC or Commission) issues its final order in this docket.

## II. LED STREET LIGHT PROJECT EXPENDITURE ELGIBILITY TOWARDS THE FINANCIAL INCENTIVE SPENDING CAP PROVISION

Approximately every three years, the MPUC reviews and approves a CIP performance financial incentive mechanism as a result of input from the Department, utilities, and other stakeholders. The financial incentive mechanism that is being applied in this docket was approved on August 5, 2016, in docket no. E,G-999/CI-08-133. The approved mechanism added a new concept of capping the performance incentive at certain level of expenses for each year. Ordering point D. from the Order is as follows:

*For all utilities, set the following Conservation Improvement Plan (CIP)Expenditure Caps:*

- 1) 40 percent in 2017,*
- 2) 35 percent in 2018, and*
- 3) 30 percent in 2019.*

Otter Tail believes the impacts of this new incentive cap were not fully known at the time. Now with two CIP filings complete (2017 and 2018), all stakeholders have a much clearer understanding of the impacts and unintended impacts of the new spending cap provision.

The spending cap provision is the main area of disagreement between the Company and the Department in this docket. The question before the Commission is, “shall expenses from the Company’s LED Streetlight project be eligible towards the spending cap provision for calculating the Company’s performance incentive?” The Company believes the expenses should be considered eligible as long as net benefits from these projects are not included in the performance incentive calculation.

In its initial petition in this docket, Otter Tail pointed to Commission Order points 1. and 2. in Docket No. E,G-999/DI-12-1342, July 16, 2013, which established guidelines for utilities participation in CIP projects.

Otter Tail and the Department agree that Order point 1. is not applicable to the current docket because double recovery is not at issue here.

Order point 2. from the MPUC’s July 16, 2013 decision is as follows:

*2. The Commission further finds that energy savings and net benefits resulting from utility participation in CIP projects at their own facilities shall not count toward the determination of the utility’s DSM financial incentive.*

Otter Tail believes its proposal to include spending from Company projects towards the new spending provision does not conflict with Order point 2. The Department’s Comments attempt to combine what was listed in this order point (energy savings and net benefits) with what the new

financial mechanism contains: a spending provision. However, the Commission has not determined eligibility of Company expenses towards the utility's performance incentive. The order point only discusses energy savings and net benefits, and Otter Tail's proposal to include Company expense does not conflict with this ordering point.

The Department goes on further to explain that since expenses are a part of net benefits, this disallows them from the utility performance incentive. However, there are several instances currently where expenses are included towards the spending cap provision but net benefits are not included. POP Solar, House Therapy (Low-Income), and Regulatory Assessments are programs that have expenses included towards the performance incentive despite the fact that net benefits from these programs are not included. Otter Tail's proposed treatment of expenses from the Company's LED Street Light project is no different from these other programs, and therefore its expense should be included.

Lastly the Department argues that Otter Tail is not experiencing a loss in profit due to conservation. However, the Department ignores the lost sales from Otter Tail's conservation efforts in programs that have net benefits eligible towards the performance incentive but disallowed because of Otter Tail's fiscally responsible management of CIP. For example, in 2018 Otter Tail produced \$34,609,459 in customer net benefits from 70,237,937 kWh of energy savings. Approximately \$0.49 of net benefits for every kWh of savings. At 12 percent of net benefits, this would be a performance incentive of \$4,153,135. However, Otter Tail is proposing a performance incentive of \$3,153,096<sup>1</sup> for 2018 achievements. Otter Tail could have gained a performance incentive of \$3,153,096 by only producing \$26 million in net benefits (12 percent of \$26 million) which equates to about 53 million kWh of savings. Essentially Otter Tail's performance produced about 17 million kWh that do not qualify towards the performance incentive. These are lost sales that results in a loss of profit to the Company in 2018 and beyond, as well as a loss of investment opportunity.

As the Company stated in its initial petition, 24 percent of Otter Tail's net benefits are not eligible towards financial incentive purely due to the fact that the company has not spent substantially more money to achieve these results: but the net benefit achievement, regardless of the low cost incurred to achieve it, results in lost sales revenue, which could serve as a disincentive to cost effective conservation if not recognized in the program's incentive. The Department continues to ignore the fact that including expense from the Company's LED Street Light project simply unlocks net benefits from customer-eligible projects for the performance incentive. Otter Tail's proposed performance incentive only includes net benefits from customer projects.

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<sup>1</sup> Otter Tail proposes to reduce the \$3,153,096 by \$148,785 to account for actual 2018 LED Street Light expenses versus forecasted 2017 expenses in the approved 2017 CIP financial incentive.

In summary, the July 16, 2013 Commission Order provides guidelines for utility participation in CIP, but it does not limit the eligibility of expenses from utility projects being applied towards a spending cap provision. With the Order being silent on this issue, the Company asks the Commission to not limit the incentive as proposed by the Department in this docket.

As discussed above, Otter Tail is not including net benefits from Company-owned projects towards the performance incentive. Otter Tail offers there are other CIP programs that have performance incentive qualifying expenses but no inclusion of net benefits towards the financial incentive<sup>2</sup>. Otter Tail has demonstrated that significant lost sales revenues have occurred in both 2017 and 2018 that are not being counterbalanced with performance incentive compensation. Lastly, including expenses towards the performance incentive mechanism encourages utilities to pursue Company projects that might not otherwise be pursued.

### III. DISCUSSION OF THE SPENDING CAP PROVISION WITHIN THE FINANCIAL PERFORMANCE INCENTIVE MECHANISM

#### 1. The Spending Cap Provision Disincentivizes Cost-Effective Program Spending.

Otter Tail believes the current CIP performance incentive mechanism, when applied to Otter Tail's high-performance results, is not consistent with Minnesota statute, harms the Company and potentially its customers, and does not serve the public interest. The mechanism, with the new spending cap provision, is counter-intuitive to cost-effective conservation offerings since it could encourage an otherwise high-performing utility to increase program costs, simply to increase the Company's financial incentive.

Minnesota Statute § 216B.16 Subd. 6c provides guidance for the public utilities commission when approving incentive plans. The statute is as follows:

#### *Incentive plan for energy conservation improvement.*

*(a) The commission may order public utilities to develop and submit for commission approval incentive plans that describe the method of recovery and accounting for utility conservation expenditures and savings. In developing the incentive plans the commission shall ensure the effective involvement of interested parties.*

*(b) In approving incentive plans, the commission shall consider:*

- (1) Whether the plan is likely to increase utility investment in cost-effective energy consumption;*
- (2) Whether the plan is compatible with the interest of utility ratepayers and other interested parties;*

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<sup>2</sup> POP Solar, House Therapy, PUC Assessments.

- (3) Whether the plan links the incentive to the utility performance in achieving cost-effective conservation; and  
 (4) Whether the plan is in conflict with other provisions of this chapter.

For Otter Tail, the performance incentive’s spending cap provision, as applied is inconsistent with points (1), (2), and (3) of the statute. The spending cap provision creates unintended consequences by encouraging the Company to spend money to increase the performance incentive without providing additional customer benefits. The spending provision encourages non-cost-effective spending, which is in direct conflict with items 1 through 3 above.

Table 1 illustrates potential financial incentive benefits from spending additional dollars with no benefit to customers.

**Table 1**

	<b>2018</b>	<b>Actual Year</b>	<b>Additional Spend</b>
			\$2,127,742
1	Benefits	\$42,713,597	\$42,713,597
2	Expenses	\$9,008,847	\$11,136,589
3	<b>35.0%</b>	<b>\$3,153,096</b>	<b>\$3,897,806</b>
4	Net Benefits*	\$34,609,459	\$32,481,717
5	<b>12.00%</b>	<b>\$4,153,135</b>	<b>\$3,897,806</b>
6	<b>Lesser of 3 and 5</b>	<b>\$3,153,096</b>	<b>\$3,897,806</b>
7	Additional Financial Incentive		\$744,710
8	Fin. Incentive per \$1 of Spending		\$0.35
9	Additional Costs to Customers		\$2,872,452
*Net benefits aren't Benefits minus Expenses, since some programs have eligible expenses but not eligible benefits.			

In the Table 1 example, Otter Tail shows its actual 2018 conservation results in the middle column. In the far-right column, Otter Tail shows a hypothetical scenario of adding \$2,127,742 of additional spending without increasing customer benefits in line 1. Table 1 compares these two columns. While the expenses increase by \$2.1 million in line 2 and the net benefits decrease in line 4, the overall performance incentive for the Company would increase to \$3,897,806 in line 6. This additional spending increases the Company’s financial incentive by \$744,710 in line 7. As shown in line 8, for every dollar the Company spends up to \$2.1 million the Company gains \$0.35 in financial incentive.

This scenario increases customer costs by \$2,872,452 (line 9) from \$2.1 million of spending and \$744,710 of utility performance incentive with no additional benefit to customers. This unintended consequence of the spending cap applies uniquely to OTP because it has achieved such a high conservation achievement at such low costs. And therefore, the result of the

spending cap is unjust, in this circumstance. If Otter Tail had a lower achievement or had incurred higher costs, the spending cap would not limit OTP's incentive. OTP's performance should warrant a higher incentive, not a lower one.

Otter Tail believes it should be exempt from the spending cap provision and be awarded the same level of net benefits as the other Minnesota electric utilities at 12 percent in 2018. Table 1 illustrates Otter Tail's commitment to diligently managing program costs for customers, despite the large incentive to spend more. Otter Tail believes a performance payout of \$4,153,135<sup>3</sup>, which is 12 percent of net benefits, is warranted based on performance and effective program cost management. The additional \$1,000,039 in performance incentive for 2018 is \$1.8 million less than if the Company would have spent an additional \$2.1 million to gain an additional \$744,710 in performance incentive.

If Otter Tail spent an additional \$2.1 million in 2018, the cost per a kWh saved would be \$0.159/kwh saved, lower than the approved budgeted cost of \$0.165/kWh saved. A similar situation applies for 2017, but Otter Tail does not propose to make any adjustments to its 2017 performance incentive based on its findings.

Removing the spending cap provision provides more net benefits to customers. Retaining the spending provision provides no additional program benefits to customers and creates a disincentive for utilities to run cost-effective programs. The spending cap provision in its current form creates different drivers for utilities likely creating different outcomes.

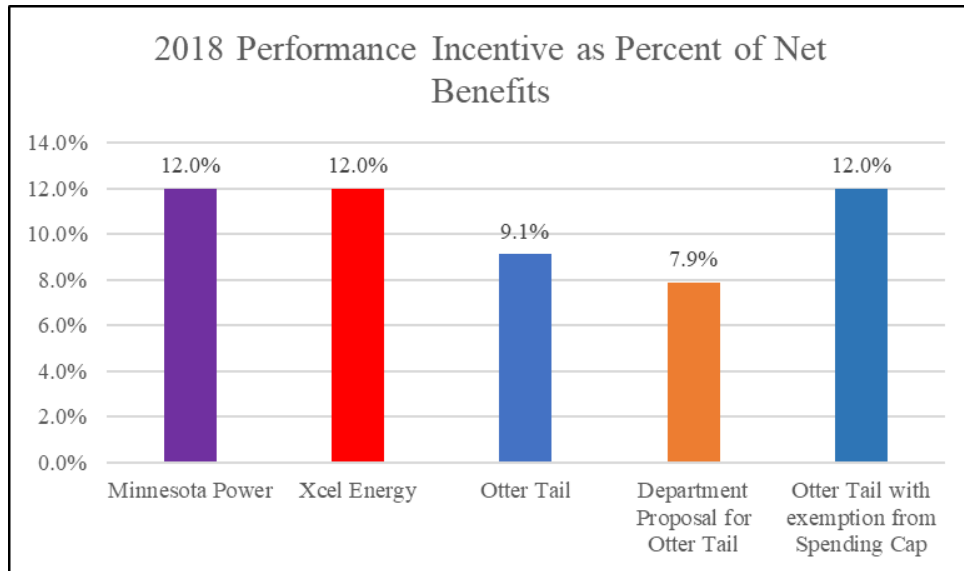
## **2. The Spending Cap Provision Treats Otter Tail Different from the other Minnesota Electric Utilities.**

The Chart 1 shows the impact of the spending cap provision for Minnesota's three electric utilities.

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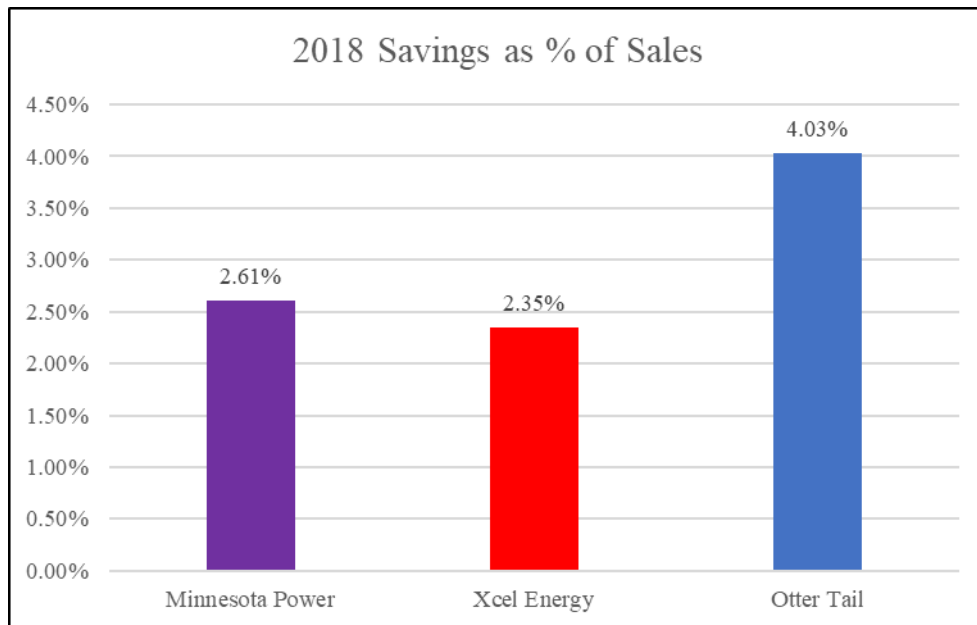
<sup>3</sup> Otter Tail proposes to reduce the \$4,153,135 by \$148,785 to account for actual 2018 LED Street Light expenses versus forecasted 2017 expenses in the approved 2017 CIP financial incentive.

**Chart 1**



The following chart, Chart 2, shows the energy savings percentage of sales performance for Minnesota’s three electric utilities.

**Chart 2**



These two charts show Otter Tail performance is the highest in the state at 4.03 percent energy savings, but the Company may receive the lowest performance incentive award at 7.9 - 9.1 percent of net benefits. Otter Tail understands the reason for the spending cap provision was to limit a utility’s performance incentive, but a full understanding of the impacts of the spending cap provision were unknown when the Commission approved the provision in 2016 and is now producing unintended consequences. All analysis at the time of the Commission’s decision was



based on forecasted performance. Now that actual results can be examined it makes sense for the Commission to review if the spending cap provision is truly in alignment with Minnesota Statute § 216B.16 Subd. 6c and serving the public interest. Otter Tail's record achievement shows its strong commitment to CIP performance. Eligibility toward an equitable CIP performance incentive counterbalances Otter Tail's inherent incentive to sell more energy.

### **3. Otter Tail Requests Exemption from the Financial Incentive Mechanism's Spending Cap Provision**

In this docket Otter Tail is requesting an exemption from the spending cap provision due to it conflicting with statute, creating a non-equivalent to other utilities performance incentive, and incentivizing non-cost-effective program spending. A similar exemption to the financial incentive mechanism was granted by the Commission to Minnesota Power under the previous financial incentive mechanism in 2013.

The Department's October, 1, 2013 Comments in Docket No. E,G-999/CI-08-133, described Minnesota Power's ability to achieve comparable incentive to the other electric utilities as "inappropriate". The Department concluded that Minnesota Power should at least be able to earn an incentive equal to 7 cents per kWh which was equivalent to the other electric utilities. Because of the incentive structure being "inappropriate" the Department supported Minnesota Power's proposal to achieve a financial incentive at a higher percent (30 percent) of net benefits than its electric utility peers at 20 percent of net benefits. On November 19, 2013, the Commission agreed with and adopted the recommendation of the Department approving an incentive cap for Minnesota Power equal to 30 percent of net benefits. Both Xcel Energy and Otter Tail maintained a cap of 20 percent of net benefits for 2014-2016 CIP performance incentive filings. Otter Tail is requesting 12 percent of net benefits in this docket.

Otter Tail believes it is currently in a similar position as Minnesota Power in 2013 and proposes a similar exemption request. With the current spending cap provision, Otter Tail cannot achieve a similar level of payout as the other electric utilities unless it pursues non-cost-effective program spending. Otter Tail requests a two-year exemption to the spending cap provision for 2018 and 2019. The financial incentive mechanism is scheduled to be reviewed again this summer with the Department filing a proposal on July 1, 2019. The Commission's decision in that proceeding will likely determine the CIP performance incentive for 2020 and beyond.

If the Commission agrees that Otter Tail's proposed payout of 12 percent of net benefits is appropriate, Otter Tail does not request an additional increase to the CCRA surcharge. Otter Tail is mindful to rate impacts to its customers and prefers a gradual approach for recovering the additional performance incentive. Consistent with its initial April 1, 2019 filing, Otter Tail requests a CCRA rate of \$0.00710/kWh.

#### IV. OTTER TAIL'S 2017 CIP TRACKER ACCOUNT AND PROPOSED 2018 CIP TRACKER ACCOUNT

In Otter Tail's April 1, 2019 Petition the Company requested Commission approval of its recoveries and expenditures included in its 2018 CIP tracker account. In the Department's May 31, 2019 comments, the Department correctly pointed out the Company's December 31, 2017 balance does not match the December 31, 2017 balance approved in the Commission's order from October 30, 2018 in Docket number M-18-119. In the Order, the Commission approved a year-end balance of \$7,362,345, while Otter Tail included a balance of \$7,365,957, a difference of \$3,612.

Otter Tail has gone back and analyzed the difference and discovered several small adjustments leading to the differences. Otter Tail has included Attachment 1 Appendix A Tables; 1A, 1B and 1C showing all monthly entries to its 2017 CIP tracker account. Otter Tail has included three versions of Table 1 to explain the small changes. First, Otter Tail's 2017 CIP Tracker balance of \$7,362,345 approved by the Commission was understated. As show in the below table, CIP revenue recorded for December 2017 was overstated by \$3,794 due to a calculation error which was discovered in 2018. Secondly, the short-term debt percentage was also incorrectly rounded to two decimal places instead of four decimal places starting in May of 2017. These two adjustments led Otter Tail to file the 2017 CIP tracker account year-end balance at \$7,365,957 in its April 1, 2019 CIP report. Since reviewing these errors, Otter Tail discovered the truncated carrying charge at two decimal places and fixed it to the appropriate four decimal places. This is shown below for a total impact of \$182. Otter Tail has included Appendix 1 Table 1C to reflect the corrected 2017 year-end balance of \$7,366,140. Otter Tail requests the Commission to approve the corrected 2017 CIP tracker account to reflect a year-end balance of \$7,366,140.

##### Appendix A Tables, 2017 CIP Tracker Account Adjustments

<b>Table 1A</b> , MPUC approved 2017 CIP Tracker year-end balance	\$7,362,345
December 2017 keying error	\$3,794
2017 Carrying charge adjusted to 2 decimal places	-\$182
<b>2017 Year-end balance Subtotal:</b>	<b>\$7,365,957</b>
<b>Table 1B</b> , 2017 tracker included in April 1, 2019 filing	\$7,365,957
2017 Carrying charge corrected back to 4 decimal places	\$182
<b>2017 Year-end balance Subtotal:</b>	<b>\$7,366,140</b>
<b>Table 1C</b> , 2017 tracker balance included in June 24, 2019 filing	<b>\$7,366,140</b>

Otter Tail requests the Commission to approve its 2018 CIP tracker account with a year-end balance of \$5,994,438. This balance includes a financial performance incentive amount of \$2,938,110 as well as the carry charge carried out to four decimal places. Otter Tail has included

Attachment 2, 2018 Appendix A, Table 1 showing the monthly entries to the 2018 CIP tracker account. Otter Tail also included Attachment 3, showing the basis of the carrying charge which is Otter Tail's short-term cost of debt rate of 2.5549 percent, approved by the Commission in the Company's latest general rate case, Docket No. E017/GR-15-1033.

Otter Tail also requests the Commission to approve its proposed CCRA factor of \$0.00710/kWh reflected on customers' bills through the Resource Adjustment starting with bills rendered on and after October 1, 2019. Lastly the Company requests approval of a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the FCA with the Conservation Improvement Adjustment on customer bills.

## V. SUMMARY

Otter Tail believes it has demonstrated that expenses from Company projects such as its LED Street Light project, should be eligible within the spending cap provision. Net benefits from these projects are not being counted towards the financial incentive consistent with prior Commission Orders. The only net benefits counted towards the performance incentive are from non-Company projects. In Otter Tail's case, lost sales and lost revenues are occurring from other financial incentive eligible programs and the Company is not being compensated for this loss. As long as there is no double recovery, the Commission should support Company project expenses towards the financial performance incentive to encourage cost-effective Company-owned projects which can produce immense customer benefits. Without inclusion of Company project expenses, utilities will likely not pursue these highly cost-effective projects.

Lastly the Company requests approval of its proposed exemption from the spending cap provision. As discussed earlier in these comments the spending cap provision produces unintended consequences incentivizing spending that is not in the public interest or consistent with Minnesota statutes. While this outcome is unintended it does not conform to Minnesota Statute § 216B.16 Subd. 6c. Otter Tail believes an exemption from this provision will align the Company's incentive with the other two electric utilities until the Commission decides a new mechanism for 2020 CIP achievements. The Commission has provided Minnesota Power a similar exemption to allow alignment between the three electric utilities for incentive levels for 2014-2016.

Otter Tail respectfully requests the MPUC to approve the following items:

1. The inclusion of the Company's LED Street Light project expenses, less any rate of return for the project within the financial incentive mechanism. This inclusion is reflected to include adjustments to the CIP tracker account of:
  - a. a 2018 financial incentive of \$3,004,311 based on total 2018 eligible CIP expenditures of \$9,008,847 (2018 financial incentive of \$3,153,096 reduced by \$148,785 to account for actual 2018 LED Street Light expenses).

2. The adjusted 2017 CIP tracker year-end balance of \$7,366,139.
3. The 2018 CIP tracker year-end balance of \$5,994,438; which includes a 2017 financial incentive of \$2,938,110 based on total 2017 eligible CIP expenses of \$6,973,310.
4. Approval to implement the CCRA factor of \$0.00710/kWh reflected on customers' bills through the Resource Adjustment starting with bills rendered on and after October 1, 2019.
5. Approval of a variance to Minnesota Rule 7820.3500 to allow Otter Tail to continue to combine the FCA with the Conservation Improvement Adjustment on customer bills.

Otter Tail prefers the following alternative to item number 1(a) above.

1. An exemption for Otter Tail from the performance incentive's spending cap provision for 2018 and 2019. This results in a performance incentive payout of 12 percent of net benefits or \$4,044,350 for 2018 CIP achievements (2018 financial incentive of \$4,153,135 reduced by \$148,785 to account for actual 2018 LED Street Light expenses).

Dated: June 24, 2019

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ JASON A. GRENIER  
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## Attachment 1

## Table 1A

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 0.79% Jan-Apr 2.5549% May-Dec (D)	Balance Account 1860.3000 + 1860.3100 (E)
Balance Dec. 31, 2016	0.00	96,825,733.89	(93,364,268.55)	959,479.39	4,835,852
<b>January:</b>					
Carrying Charge	--	--	--	3,183.60	3,184
Trf Carrying Charge Bal					0
Labor Accrual Adj					0
Activity	0.00	396,105.97	(1,144,865.98)	--	(748,760)
Deferred Taxes	--	--	--	--	--
Balance January 31, 2017	0.00	97,221,839.86	(94,509,134.53)	962,662.99	4,090,275
<b>February:</b>					
Carrying Charge	--	--	--	2,692.76	2,693
Labor Accrual Adj					0
Activity	0.00	463,121.68	(745,033.67)	--	(281,912)
Deferred Taxes	--	--	--	--	--
Balance February 28, 2017	0.00	97,684,961.54	(95,254,168.20)	965,355.75	3,811,056
<b>March:</b>					
Carrying Charge	--	--	--	2,508.95	2,509
Labor Accrual Adj					0
Activity	0.00	563,168.35	(681,604.58)	--	(118,436)
Deferred Taxes	--	--	--	--	--
Balance March 31, 2017	0.00	98,248,129.89	(95,935,772.78)	967,864.70	3,695,129
<b>April:</b>					
Carrying Charge	--	--	--	2,432.63	2,433
Labor Accrual Adj					0
Activity	0.00	443,689.44	(626,766.57)	--	(183,077)
Deferred Taxes	--	--	--	--	--
Balance April 30, 2017	0.00	98,691,819.33	(96,562,539.35)	970,297.33	3,514,484
<b>May:</b>					
Carrying Charge	--	--	--	7,482.63	7,483
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	355,073.14	(559,870.23)	--	(204,797)
Deferred Taxes	--	--	--	--	--
Balance May 31, 2017	0.00	99,046,892.47	(97,122,409.58)	977,779.96	3,317,170
<b>June:</b>					
Carrying Charge	--	--	--	7,062.53	7,063
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	366,623.28	(576,904.02)	--	(210,281)
Deferred Taxes	--	--	--	--	--
Balance June 30, 2017	0.00	99,413,515.75	(97,699,313.60)	984,842.49	3,113,952
<b>July:</b>					
Carrying Charge	--	--	--	6,629.86	6,630
Bonus/Incentive					0
Labor Accrual Adj					
Activity	0.00	455,847.66	(572,512.99)	--	(116,665)
Deferred Taxes	--	--	--	--	--
Balance July 31, 2017	0.00	99,869,363.41	(98,271,826.59)	991,472.35	3,003,916

## Attachment 1

## Table 1A

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

<b>August:</b>					
Carrying Charge	--	--		6,395.59	6,396
Bonus/Incentive		5,031,678.00			5,031,678
Labor Accrual Adj					0
Activity	0.00	778,820.84	(619,561.64)	--	159,259
Deferred Taxes	--	--	--	--	--
Balance August 31, 2017	0.00	105,679,862.25	(98,891,388.23)	997,867.94	8,201,249
<b>September:</b>					
Carrying Charge	--	--	--	17,461.14	17,461
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	515,010.17	(586,934.86)	--	(71,925)
Deferred Taxes	--	--	--	--	--
Balance September 30, 2017	0.00	106,194,872.42	(99,478,323.09)	1,015,329.08	8,146,785
<b>October:</b>					
Carrying Charge	--	--	--	17,345.18	17,345
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	469,223.00	(790,642.95)	--	(321,420)
Deferred Taxes	--	--	--	--	--
Balance October 31, 2017	0.00	106,664,095.42	(100,268,966.04)	1,032,674.26	7,842,711
<b>November:</b>					
Carrying Charge	--			16,697.78	16,698
Labor Accrual Adj					0
Activity	0.00	566,822.15	(1,149,320.91)	--	(582,499)
Deferred Taxes	--	--	--	--	--
Balance November 30, 2017	0.00	107,230,917.57	(101,418,286.95)	1,049,372.04	7,276,910
<b>December:</b>					
Carrying Charge	--	--	--	15,493.15	15,493
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	1,232,393.81	(1,162,451.20)	--	69,943
Deferred Taxes	--	--	--	--	--
Balance December 31, 2017	0.00	108,463,311.38	(102,580,738.15)	1,064,865.19	7,362,345

## Attachment 1

## Table 1B

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 0.79% Jan-Apr 2.5549% May-Dec (D)	Balance Account 1860.3000 + 1860.3100 (E)
Balance Dec. 31, 2016	0.00	96,825,733.89	(93,364,268.55)	959,479.39	4,835,852
<b>January:</b>					
Carrying Charge	--	--	--	3,183.60	3,184
Trf Carrying Charge Bal					0
Labor Accrual Adj					0
Activity	0.00	396,105.97	(1,144,865.98)	--	(748,760)
Deferred Taxes	--	--	--	--	--
Balance January 31, 2017	0.00	97,221,839.86	(94,509,134.53)	962,662.99	4,090,275
<b>February:</b>					
Carrying Charge	--	--	--	2,692.76	2,693
Labor Accrual Adj					0
Activity	0.00	463,121.68	(745,033.67)	--	(281,912)
Deferred Taxes	--	--	--	--	--
Balance February 28, 2017	0.00	97,684,961.54	(95,254,168.20)	965,355.75	3,811,056
<b>March:</b>					
Carrying Charge	--	--	--	2,508.95	2,509
Labor Accrual Adj					0
Activity	0.00	563,168.35	(681,604.58)	--	(118,436)
Deferred Taxes	--	--	--	--	--
Balance March 31, 2017	0.00	98,248,129.89	(95,935,772.78)	967,864.70	3,695,129
<b>April:</b>					
Carrying Charge	--	--	--	2,432.63	2,433
Labor Accrual Adj					0
Activity	0.00	443,689.44	(626,766.57)	--	(183,077)
Deferred Taxes	--	--	--	--	--
Balance April 30, 2017	0.00	98,691,819.33	(96,562,539.35)	970,297.33	3,514,484
<b>May:</b>					
Carrying Charge	--	--	--	7,468.28	7,468
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	355,073.14	(559,870.23)	--	(204,797)
Deferred Taxes	--	--	--	--	--
Balance May 31, 2017	0.00	99,046,892.47	(97,122,409.58)	977,765.61	3,317,155
<b>June:</b>					
Carrying Charge	--	--	--	7,048.96	7,049
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	366,623.28	(576,904.02)	--	(210,281)
Deferred Taxes	--	--	--	--	--
Balance June 30, 2017	0.00	99,413,515.75	(97,699,313.60)	984,814.57	3,113,924
<b>July:</b>					
Carrying Charge	--	--	--	6,617.09	6,617
Bonus/Incentive					0
Labor Accrual Adj					
Activity	0.00	455,847.66	(572,512.99)	--	(116,665)

Table 1B

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

Deferred Taxes	--	--	--	--	--
Balance July 31, 2017	0.00	99,869,363.41	(98,271,826.59)	991,431.66	3,003,875
<b>August:</b>					
Carrying Charge	--	--	--	6,383.24	6,383
Bonus/Incentive		5,031,678.00			5,031,678
Labor Accrual Adj					0
Activity	0.00	778,820.84	(619,561.64)	--	159,259
Deferred Taxes	--	--	--	--	--
Balance August 31, 2017	0.00	105,679,862.25	(98,891,388.23)	997,814.90	8,201,196
<b>September:</b>					
Carrying Charge	--	--	--	17,427.54	17,428
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	515,010.17	(586,934.86)	--	(71,925)
Deferred Taxes	--	--	--	--	--
Balance September 30, 2017	0.00	106,194,872.42	(99,478,323.09)	1,015,242.44	8,146,699
<b>October:</b>					
Carrying Charge	--	--	--	17,311.73	17,312
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	469,223.00	(790,642.95)	--	(321,420)
Deferred Taxes	--	--	--	--	--
Balance October 31, 2017	0.00	106,664,095.42	(100,268,966.04)	1,032,554.17	7,842,590
<b>November:</b>					
Carrying Charge	--	--	--	16,665.50	16,666
Labor Accrual Adj					0
Activity	0.00	566,822.15	(1,149,320.91)	--	(582,499)
Deferred Taxes	--	--	--	--	--
Balance November 30, 2017	0.00	107,230,917.57	(101,418,286.95)	1,049,219.67	7,276,757
<b>December:</b>					
Carrying Charge	--	--	--	15,463.11	15,463
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	1,232,393.81	(1,158,656.74)	--	73,737
Deferred Taxes	--	--	--	--	--
Balance December 31, 2017	0.00	108,463,311.38	(102,576,943.69)	1,064,682.78	7,365,957



## Attachment 1

## Table 1C

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 0.79% Jan-Apr 2.5549% May-Dec (D)	Balance Account 1860.3000 + 1860.3100 (E)
Balance Dec. 31, 2016	0.00	96,825,733.89	(93,364,268.55)	959,479.39	4,835,852
<b>January:</b>					
Carrying Charge	--	--	--	3,183.60	3,184
Trf Carrying Charge Bal					0
Labor Accrual Adj					0
Activity	0.00	396,105.97	(1,144,865.98)	--	(748,760)
Deferred Taxes	--	--	--	--	--
Balance January 31, 2017	0.00	97,221,839.86	(94,509,134.53)	962,662.99	4,090,275
<b>February:</b>					
Carrying Charge	--	--	--	2,692.76	2,693
Labor Accrual Adj					0
Activity	0.00	463,121.68	(745,033.67)	--	(281,912)
Deferred Taxes	--	--	--	--	--
Balance February 28, 2017	0.00	97,684,961.54	(95,254,168.20)	965,355.75	3,811,056
<b>March:</b>					
Carrying Charge	--	--	--	2,508.95	2,509
Labor Accrual Adj					0
Activity	0.00	563,168.35	(681,604.58)	--	(118,436)
Deferred Taxes	--	--	--	--	--
Balance March 31, 2017	0.00	98,248,129.89	(95,935,772.78)	967,864.70	3,695,129
<b>April:</b>					
Carrying Charge	--	--	--	2,432.63	2,433
Labor Accrual Adj					0
Activity	0.00	443,689.44	(626,766.57)	--	(183,077)
Deferred Taxes	--	--	--	--	--
Balance April 30, 2017	0.00	98,691,819.33	(96,562,539.35)	970,297.33	3,514,484
<b>May:</b>					
Carrying Charge	--	--	--	7,482.63	7,483
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	355,073.14	(559,870.23)	--	(204,797)
Deferred Taxes	--	--	--	--	--
Balance May 31, 2017	0.00	99,046,892.47	(97,122,409.58)	977,779.96	3,317,170
<b>June:</b>					
Carrying Charge	--	--	--	7,062.53	7,063
Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	366,623.28	(576,904.02)	--	(210,281)
Deferred Taxes	--	--	--	--	--
Balance June 30, 2017	0.00	99,413,515.75	(97,699,313.60)	984,842.49	3,113,952
<b>July:</b>					
Carrying Charge	--	--	--	6,629.86	6,630
Bonus/Incentive					0
Labor Accrual Adj					
Activity	0.00	455,847.66	(572,512.99)	--	(116,665)
Deferred Taxes	--	--	--	--	--

## Attachment 1

## Table 1C

## 2017 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT

## Financial Incentive Project - Conservation Improvement Programs

## Otter Tail Power Company

Balance July 31, 2017	0.00	99,869,363.41	(98,271,826.59)	991,472.35	3,003,916
<b>August:</b>					
Carrying Charge	--	--	--	6,395.59	6,396
Bonus/Incentive		5,031,678.00			5,031,678
Labor Accrual Adj					0
Activity	0.00	778,820.84	(619,561.64)	--	159,259
Deferred Taxes	--	--	--	--	--
Balance August 31, 2017	0.00	105,679,862.25	(98,891,388.23)	997,867.94	8,201,249
<b>September:</b>					
Carrying Charge	--	--	--	17,461.14	17,461
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	515,010.17	(586,934.86)	--	(71,925)
Deferred Taxes	--	--	--	--	--
Balance September 30, 2017	0.00	106,194,872.42	(99,478,323.09)	1,015,329.08	8,146,785
<b>October:</b>					
Carrying Charge	--	--	--	17,345.18	17,345
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	469,223.00	(790,642.95)	--	(321,420)
Deferred Taxes	--	--	--	--	--
Balance October 31, 2017	0.00	106,664,095.42	(100,268,966.04)	1,032,674.26	7,842,711
<b>November:</b>					
Carrying Charge	--	--	--	16,697.78	16,698
Labor Accrual Adj					0
Activity	0.00	566,822.15	(1,149,320.91)	--	(582,499)
Deferred Taxes	--	--	--	--	--
Balance November 30, 2017	0.00	107,230,917.57	(101,418,286.95)	1,049,372.04	7,276,910
<b>December:</b>					
Carrying Charge	--	--	--	15,493.15	15,493
Lost Margin & Bonus/Incentive					0
Labor Accrual Adj					0
Activity	0.00	1,232,393.81	(1,158,656.74)	--	73,737
Deferred Taxes	--	--	--	--	--
Balance December 31, 2017	0.00	108,463,311.38	(102,576,943.69)	1,064,865.19	7,366,140

## Attachment 2

Table 1

**2018 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT**  
**Financial Incentive Project - Conservation Improvement Programs**  
**Otter Tail Power Company**

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 2.55% (D)	Balance Account 1860.3000 + 1860.3100 (E)
Balance Dec. 31, 2017	0.00	108,463,311.38	(102,576,943.69)	1,064,865.19	7,366,139.81
<b>January:</b>					
Carrying Charge	--	--	--	15,683.13	15,683.13
Trf Carrying Charge Bal					0.00
Labor Accrual Adj					0.00
Activity	0.00	309,062.46	(1,431,164.25)	--	(1,122,101.79)
Deferred Taxes	--	--	--	--	--
Balance January 31, 2018	0.00	108,772,373.84	(104,008,107.94)	1,080,548.32	6,259,721.15
<b>February:</b>					
Carrying Charge	--	--	--	13,327.47	13,327.47
Labor Accrual Adj					0.00
Activity	0.00	1,030,816.91	(1,359,622.33)	--	(328,805.42)
Deferred Taxes	--	--	--	--	--
Balance February 28, 2018	0.00	109,803,190.75	(105,367,730.27)	1,093,875.79	5,944,243.20
<b>March:</b>					
Carrying Charge	--	--	--	12,655.79	12,655.79
Labor Accrual Adj					0.00
Activity	0.00	515,209.43	(1,193,542.90)	--	(678,333.47)
Deferred Taxes	--	--	--	--	--
Balance March 31, 2018	0.00	110,318,400.18	(106,561,273.17)	1,106,531.58	5,278,565.52
<b>April:</b>					
Carrying Charge	--	--	--	11,238.51	11,238.51
Labor Accrual Adj					0.00
Activity	0.00	663,730.23	(1,098,416.74)	--	(434,686.51)
Deferred Taxes	--	--	--	--	--
Balance April 30, 2018	0.00	110,982,130.41	(107,659,689.91)	1,117,770.09	4,855,117.52
<b>May:</b>					
Carrying Charge	--	--	--	10,336.95	10,336.95
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	603,780.65	(975,869.87)	--	(372,089.22)
Deferred Taxes	--	--	--	--	--
Balance May 31, 2018	0.00	111,585,911.06	(108,635,559.78)	1,128,107.04	4,493,365.25
<b>June:</b>					
Carrying Charge	--	--	--	9,566.75	9,566.75
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	440,261.10	(993,868.61)	--	(553,607.51)
Deferred Taxes	--	--	--	--	--
Balance June 30, 2018	0.00	112,026,172.16	(109,629,428.39)	1,137,673.79	3,949,324.49
<b>July:</b>					
Carrying Charge	--	--	--	8,408.44	8,408.44
Bonus/Incentive					0.00
Labor Accrual Adj					
Activity	0.00	477,474.96	(1,044,746.26)	--	(567,271.30)
Deferred Taxes	--	--	--	--	--
Balance July 31, 2018	0.00	112,503,647.12	(110,674,174.65)	1,146,082.23	3,390,461.63

## Attachment 2

Table 1

**2018 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN CIP TRACKER ACCOUNT**  
**Financial Incentive Project - Conservation Improvement Programs**  
**Otter Tail Power Company**

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 2.55% (D)	Balance Account 1860.3000 + 1860.3100 (E)
<b>August:</b>					
Carrying Charge	--	--		7,218.58	7,218.58
Bonus/Incentive					0.00
Labor Accrual Adj Activity	0.00	365,051.35	(1,026,498.08)	--	0.00 (661,446.73)
Deferred Taxes	--	--	--	--	--
Balance August 31, 2018	0.00	112,868,698.47	(111,700,672.73)	1,153,300.81	2,736,233.48
<b>September:</b>					
Carrying Charge	--	--		5,825.67	5,825.67
Lost Margin & Bonus/Incentive					0.00
Labor Accrual Adj Activity	0.00	880,226.63	(975,459.07)	--	0.00 (95,232.44)
Deferred Taxes	--	--	--	--	--
Balance September 30, 2018	0.00	113,748,925.10	(112,676,131.80)	1,159,126.48	2,646,826.71
<b>October:</b>					
Carrying Charge	--	--		5,635.31	5,635.31
Lost Margin & Bonus/Incentive		2,938,110.00			2,938,110.00
Labor Accrual Adj Activity	0.00	430,085.61	(1,002,537.37)	--	0.00 (572,451.76)
Deferred Taxes	--	--	--	--	--
Balance October 31, 2018	0.00	117,117,120.71	(113,678,669.17)	1,164,761.79	5,018,120.26
<b>November:</b>					
Carrying Charge	--	--		10,684.00	10,684.00
Labor Accrual Adj Activity	0.00	671,208.41	(1,160,709.24)	--	0.00 (489,500.83)
Deferred Taxes	--	--	--	--	--
Balance November 30, 2018	0.00	117,788,329.12	(114,839,378.41)	1,175,445.79	4,539,303.43
<b>December:</b>					
Carrying Charge	--	--		9,664.56	9,664.56
Lost Margin & Bonus/Incentive					0.00
Labor Accrual Adj Activity	0.00	2,640,854.63	(1,195,384.43)	--	0.00 1,445,470.20
Deferred Taxes	--	--	--	--	--
Balance December 31, 2018	0.00	120,429,183.75	(116,034,762.84)	1,185,110.35	5,994,438.19

**Attachment 3**  
**Otter Tail Power Company**

**XXIV. Final Capital Structure and Overall Cost of Capital**

The final capital structure and overall cost of capital resulting from the decisions made in this order are set forth below:

<b>Component</b>	<b>Ratio</b>	<b>Cost</b>	<b>Weighted Cost</b>
Long-Term Debt	44.0601%	5.6229%	2.4775%
Short-Term Debt	3.4399%	2.5549%	0.0879%
Common Equity	52.5000%	9.4100%	4.9403%
Total	100.000%		7.5056%

## CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2018 Demand Side Management  
Financial Incentive Project and Annual Filing to Update the Conservation  
Improvement Project Rider  
Docket No. E017/M-19-256**

I, Mikayla Osterman, 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  
Reply Comments**

Dated this **24th** day of **June, 2019**.

*/s/ MIKAYLA OSTERMAN* \_\_\_\_\_

Mikayla Osterman  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8545

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_19-256_M-19-256
Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company	PO Box 351 200 1st St SE Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_19-256_M-19-256
Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802	Electronic Service	No	OFF_SL_19-256_M-19-256
William	Black	bblack@mmua.org	MMUA	Suite 400 3025 Harbor Lane North Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-256_M-19-256
Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron	200 S 6th St Ste 4000  Minneapolis, MN 554021425	Electronic Service	No	OFF_SL_19-256_M-19-256
Charlie	Buck	charlie.buck@oracle.com	Oracle	760 Market St FL 4  San Francisco, CA 94102	Electronic Service	No	OFF_SL_19-256_M-19-256
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-256_M-19-256
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800  St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-256_M-19-256
George	Crocker	gwillc@nawo.org	North American Water Office	PO Box 174  Lake Elmo, MN 55042	Electronic Service	No	OFF_SL_19-256_M-19-256
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-256_M-19-256

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400  Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-256_M-19-256
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600  Edina, MN 55435	Electronic Service	No	OFF_SL_19-256_M-19-256
Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.	823 E 7th St  St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-256_M-19-256
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_19-256_M-19-256
Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.	2377 Union Lake Trl  Northfield, MN 55057	Electronic Service	No	OFF_SL_19-256_M-19-256
Melissa S	Feine	melissa.feine@semcac.org	SEMCAC	PO Box 549 204 S Elm St Rushford, MN 55971	Electronic Service	No	OFF_SL_19-256_M-19-256
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-256_M-19-256
Rob	Friend	rfriend@mnchamber.com	Minnesota Chamber of Commerce - MN Waste Wise Foundation	400 Robert St N Ste 1500  Saint Paul, MN 55101	Electronic Service	No	OFF_SL_19-256_M-19-256
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-256_M-19-256
Angela E.	Gordon	angela.e.gordon@lmco.com	Lockheed Martin	1000 Clark Ave.  St. Louis, MO 63102	Electronic Service	No	OFF_SL_19-256_M-19-256



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Pat	Green	N/A	N Energy Dev	City Hall 401 E 21st St Hibbing, MN 55746	Paper Service	No	OFF_SL_19-256_M-19-256
Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-256_M-19-256
Jeffrey	Haase	jhaase@grenergy.com	Great River Energy	12300 Elm Creek Blvd  Maple Grove, MN 55369	Electronic Service	No	OFF_SL_19-256_M-19-256
Tony	Hainault	anthony.hainault@co.henn epin.mn.us	Hennepin County DES	701 4th Ave S Ste 700  Minneapolis, MN 55415-1842	Electronic Service	No	OFF_SL_19-256_M-19-256
Tyler	Hamman	tylerh@bepec.com	Basin Electric Power Cooperative	1717 E Interstate Ave  Bismarck, ND 58501	Electronic Service	No	OFF_SL_19-256_M-19-256
Patty	Hanson	phanson@rpu.org	Rochester Public Utilities	4000 E River Rd NE  Rochester, MN 55906	Electronic Service	No	OFF_SL_19-256_M-19-256
Norm	Harold	N/A	NKS Consulting	5591 E 180th St  Prior Lake, MN 55372	Paper Service	No	OFF_SL_19-256_M-19-256
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