



March 29, 2021

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VIA E-FILING

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of the Petition by Otter Tail Power Company for Approval of the Customer Eligibility, Updated Baseline and Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate
PUC Docket No. E-017/M-21-99**

Dear Mr. Seuffert:

OTP-EITE¹ submits this brief letter comment pursuant to the Minnesota Public Utilities Commission's ("Commission") notice of comment period² and initial comments filed by the Minnesota Department of Commerce, Division of Energy Resources ("Department") and the Minnesota Office of the Attorney General – Residential Utilities Division ("OAG" and, when used collectively, the "Agencies"). OTP-EITE is grateful to the Agencies for their thorough review and general acceptance and understanding of the net benefit created by the EITE rate. OTP-EITE appreciates the limited questions from the Department and the issue for additional clarification identified by the OAG. OTP-EITE understands that Otter Tail Power Company will address these issues in reply comments, and OTP-EITE is available to work with other stakeholders should any other questions arise. Therefore, based on the comprehensive record before the Commission, OTP-EITE emphasizes its continued support of Otter Tail Power Company's petition to extend the EITE rate for four more years.³

OTP-EITE remains available to address any issues or concerns that the Commission or other stakeholders may have, and looks forward to continuing to work together in this docket.

¹ OTP-EITE is an *ad hoc* consortium of large industrial end users of electric energy that meet the definition of energy-intensive, trade-exposed ("EITE") customers under section 216B.1696 of the Minnesota Statutes, consisting of forest product companies Cass Forest Products; Norbord Minnesota, LLC; and PotlatchDeltic Land & Lumber, LLC.

² Notice of Comment Period (Feb. 12, 2021) (eDocket No. 20212-170914-01).

³ Consistent with its Initial Comment which included the Affidavit of Michael Birkeland, Executive Vice President of both Minnesota Forest Industries ("MFI") and Minnesota Timber Producers Association ("TPA"), attached to this letter comment is a letter on behalf of MFI/TPA in response to the Agencies' filings.

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By copy of this letter, all parties have been served. A Certificate of Service is also attached.

Very truly yours,

Stoel Rives LLP

/s/ Andrew P. Moratzka

Andrew P. Moratzka

APM:cal
Enclosures

cc: Service List

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Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

**Re: In the Matter of the Petition by Otter Tail Power Company for Approval of the Customer Eligibility, Updated Baseline and Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate
PUC Docket No. E-017/M-21-99**

Dear Mr. Seuffert:

On behalf of a group of energy-intensive, trade-exposed (“EITE”) customers under section 216B.1696 of the Minnesota Statutes (the “EITE Statute”), consisting of forest products companies Cass Forest Products; Norbord Minnesota (West Fraser), LLC; and PotlatchDeltic Land & Lumber, LLC, I write to express appreciation for the thorough review and understanding of the important benefits created by the EITE rate for large power customers of Otter Tail Power Company.

Minnesota’s forest products companies compete on a national and global scale. On behalf of our members, Minnesota Forest Industries (“MFI”) and the Minnesota Timber Producers Association (“TPA”), appreciate that very few clarifying questions are required from the Department, and that Otter Tail Power will work with key stakeholders for additional clarification of issues identified by the Office of the Attorney General.

Again, we wish to express appreciation for the expeditious response, and express our thanks to the Agencies for their thorough review and general acceptance and understanding of the net benefit created by the EITE rate. MFI and TPA also wish to re-emphasize the importance of continued support of Otter Tail Power Company’s petition to extend the EITE rate for four more years.

Regards,



Mike Birkeland
Executive Vice President

CERTIFICATE OF SERVICE

I, Carmel Laney, hereby certify that I have this day served a true and correct copy of the following document(s), on behalf of OTP-EITE, to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States Mail at Minneapolis, Minnesota.

1. **LETTER REPLY COMMENT ON BEHALF OF OTP-EITE; and**
2. **LETTER ON BEHALF OF MINNESOTA FOREST INDUSTRIES AND MINNESOTA TIMBER PRODUCERS ASSOCIATION**

In the Matter of the Petition by Otter Tail
Power Company for Approval of the
Customer Eligibility, Updated Baseline and
Annual Update to its Energy-Intensive,
Trade-Exposed Rider Surcharge Rate
Docket No. E-017/M-21-99

Dated this 29th day of March, 2021.

/s/ Carmel Laney
Carmel Laney

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