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September 16, 2020

Will Seuffert
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's Petition for Approval of Tariff Changes to Facilitate Implementation of a New Customer Information System
Docket No. E017/M-18-380
Compliance Filing**

Dear Mr. Seuffert:

On June 8th, 2018 Otter Tail Power Company (Otter Tail or Company) submitted a filing to notify the Minnesota Public Utilities Commission (Commission) of the implementation of a new Customer Information System (CIS). On September 20, 2018 the Commission directed Otter Tail to "track customer complaints and inquiries regarding proration of the customer charge and, as compliance filings in this docket, to file periodic reports." The first report was filed on August 30, 2019 and reported customer contacts through June 30, 2019. The second report was filed on November 18, 2019 and reported customer contacts from July 1, 2019 through September 30, 2019. The third report was filed on March 1, 2020 and reported customer contacts from October 1, 2019 through December 31, 2019.

In 2019 Otter Tail did not receive any complaints regarding proration of the customer charge. For the same period, a total of eleven inquiries were received. As stated previously, in relation to the customer base of approximately 62,000 customers, Otter Tail believes its customers are comfortable with the proration of the customer charge.

This report covers the period from January 1, 2020 through June 30, 2020. During this time Otter Tail received no complaints and one inquiry about proration of the customer charge.

On March 3, 2020 Commission Staff submitted recommendations for terminating the compliance filing and opened a comment period that closed on March 26, 2020. The recommendations to be considered during the comment period included:

“Given that Otter Tail Power has provided three compliance filings in the above-mentioned docket with each filing demonstrating few inquiries and no complaints related to the Company’s pro-rated customer charge, staff recommends terminating the requirement of periodic reports as established in the September 20, 2018 order in order point #3.

- Instead, staff proposes that if the Company receives five or more complaints related to the pro-rated customer charge during any calendar quarter, they include this information in their annual safety, service reliability, and service quality report.
- Is there a future need for compliance filings in the above-mentioned docket?”

The Department of Commerce supported the Staff recommendation to terminate the reporting requirements and require Otter Tail to include information in the annual safety, service reliability and service quality report if the Company received five or more complaints related to the pro-rated customer charge. At the same time the Department asked that Otter Tail provide a brief explanation in reply comments as to the questions the customers raised and how they were resolved, which Otter Tail subsequently provided in the reply comments.

Otter Tail appreciates the recommendation by Commission Staff to terminate the compliance reporting in this docket and the Department’s support of that recommendation. Otter Tail agrees with the recommendation to migrate the reporting of five or more complaints per calendar quarter related to the pro-ration of the customer charge to the annual safety, service reliability, and service quality report. Otter Tail requests that the Commission place a time limit on this recommendation in order to balance reporting of customer concerns with the administrative duty required to track and report a very small part of the overall customer experience. As mentioned by the Department, Otter Tail’s customers continue to have access to the Commission’s Consumer Affairs Office to register any complaints related to the pro-ration of the customer charge. Otter Tail proposes the reporting of five or more complaints regarding the pro-ration of the customer charge per calendar quarter be concluded on December 31, 2021.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8956 or email me at cstephenson@otpc.com.

Sincerely,

/s/ *CARY STEPHENSON*
Cary Stephenson
Associate General Counsel

cjh
Enclosures
By electronic filing
cc: Service List

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Petition for Approval of Tariff Changes to Facilitate Implementation of a New Customer Information System
Docket No. E017/M-18-380

I, Carly Haiby, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert 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
Compliance Filing

Dated this 16th day of **September, 2020**

/s/ CARLY HAIBY
Carly Haiby
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

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Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_18-380_M-18-380
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-380_M-18-380
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_18-380_M-18-380
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-380_M-18-380
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-380_M-18-380
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-380_M-18-380
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-380_M-18-380
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-380_M-18-380