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June 29, 2015

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

**RE: In the Matter of Otter Tail Power Company's 2014-2028 Resource Plan  
Docket No. E017/RP-13-961  
Request for Extension to file 2016-2030 Integrated Resource Plan**

Dear Mr. Wolf:

Otter Tail Power Company ("Otter Tail" or "Company") respectfully requests the Minnesota Public Utilities Commission ("Commission") grant the Company a six-month extension to June 1, 2016 for filing its 2016-2030 Integrated Resource Plan. Pursuant to the above described docket, Commission Order dated December 5, 2014, Otter Tail's next resource plan is due December 1, 2015. This extension will allow greater clarity and definition on some specific issues.

First, the final rules for the Clean Power Plan ("CPP") were initially set to be published on June 1, 2015. The current estimates are that the final rules will be published in August or September of 2015. This leaves very little time for the Company to analyze the final rule and incorporate those rules into its final Strategist modeling for the resource plan filing on December 1, 2015. While we concede there will be continued uncertainty around and likely legal challenges to the CPP, it will be difficult to complete meaningful Strategist modeling until the final rule is published.

Secondly, in Otter Tail's most recent resource plan order, the Company was "authorized to obtain up to 300 MW of wind in the 2017-2021 time frame" and to "obtain approximately

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200 MW, subject to need, of intermediate capacity (and associated energy) in the 2019-2021 timeframe.” Otter Tail is in discussions regarding a 2016 wind addition, and it expects a decision late in 2015 on the size and type of natural gas generation that it will add to replace the retiring Hoot Lake Plant and an expiring bilateral capacity purchase. These two decisions will also have a direct impact on Strategist modeling of future generation resources.

### **Conclusion**

Granting a six-month extension for Otter Tail to file its next resource plan will allow the Company to model compliance with the CPP and include soon-to-be-made decisions on wind and natural gas generation additions. It also will not waste precious time of all parties in this matter by filing a document that will require almost immediate adjustment.

If you have any questions regarding this filing, please contact me at [bhdraxten@otpc.com](mailto:bhdraxten@otpc.com) or (218) 739-8417.

Sincerely,

*/s/ BRIAN DRAXTEN*

Brian Draxten

Manager, Resource Planning

wao

By electronic filing

c: Service List

## CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2014-2028 Resource Plan  
Docket No. E017/RP-13-961**

I, Wendi A. 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.

**Request for Extension to file 2016-2030 Integrated Resource Plan**

Dated this **29th** day of **June 2015**.

/s/ WENDIA. OLSON

Wendi A. Olson  
Regulatory Filing Coordinator  
Otter Tail Power Company  
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