

August 27, 2025

PUBLIC DOCUMENT

Mike Bull
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC Comments of the Minnesota Department of Commerce**
Docket No. E017/M-25-201

Dear Mr. Bull:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Otter Tail Power Company's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed (EITE) Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09.

The Petition was filed by Otter Tail Power Company (Otter Tail, OTP, or the Company) on April 16, 2025.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve** Otter Tail Power Company's request for renewal of customer eligibility and to update the annual EITE rider surcharge rate. The Department is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

LB/JK/ad
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-201

I. INTRODUCTION

The Minnesota Department of Commerce, Division of Energy Resources (Department) provides its comments on Otter Tail Power Company's ("Otter Tail", "OTP, or "the Company") petition (Petition) for approval of its analysis determining customer eligibility under OTP's current Energy-Intensive, Trade-Exposed Rider (EITE) for the next four years for the customers participating in the program.

Otter Tail proposes to renew the EITE eligibility for three customers currently served under the rate schedule. The Company is also proposing a 16 percent decrease in the EITE surcharge for the 2025-2026 cost-recovery period. OTP proposes a procedural change to its EITE filing schedule as well.

The Department provides its recommendations below.

II. PROCEDURAL BACKGROUND

April 16, 2025	OTP filed a Petition for approval of their 2025 Annual Update to its EITE Rider Surcharge Rate. ¹
May 13, 2025	The Commission issued a notice of comment period for the Petition. ²
July 15, 2025	The Minnesota Department of Commerce, Division of Energy Resources (Department) filed a request for variance, requesting an additional 45 days to complete its analysis. ³
July 15, 2025	The Commission granted the Department's request for extension. ⁴

Topics open for comment:

- Should Otter Tail's Petition to renew its EITE for an additional four years and update its Surcharge Rate be approved?

¹ Petition.

² Commission's Notice of Comment Period, May 13, 2025 (eDockets: [20255-218855-01](#)) (hereinafter "Commission's notice").

³ *In the Matter of Otter Tail Power's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09*, Department, Variance Request, July 15, 2025, Docket No. E017/M-25-201 (eDockets) [20257-220973-01](#).

⁴ *In the Matter of Otter Tail Power's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09*, Commission, Notice of Extension Variance, July 15, 2025, Docket No. E017/M-25-201 (eDockets) [20257-220993-01](#).

- Should Otter Tail's request to resume submitting its EITE update annually, beginning with the April 2026 filing, be approved?
- Should Otter Tail's request to recover \$1,010,352 be approved?
- Should Otter Tail's proposed recovery factors be approved?
- Are there other issues or concerns related to this matter?

The Minnesota Department of Commerce, Division of Energy Resources (Department) submits the following comments, pursuant to the Commission's notice.

III. DEPARTMENT ANALYSIS

The Department reviewed OTP's Annual Update to its EITE Rider Surcharge Rate, Rate Schedule 13.09 to assess compliance with Minnesota Rules 7829.1300 and the Commission's various Orders.

The Department provides:

- Responses to the Commission's questions;
- A discussion of the Company's compliance with Minnesota Rules and Statutes;
- An evaluation of OTP's Petition to renew the four-year eligibility of its three EITE customers;
- An analysis on whether the Company's request to adjust the revenue requirement and surcharge rate is reasonable;
- A discussion regarding the Company's proposed procedural change to return the EITE's filing cadence from biennial to annual for future EITE filings.

A. RESPONSE TO COMMISSION QUESTIONS

1. Should Otter Tail's Petition to renew its EITE for an additional four years and update its Surcharge Rate be approved?

The Department recommends that the Commission approve Otter Tail's request to renew its EITE offering for an additional four years. The Department also recommends the Commission approve the Company's proposed updated EITE surcharge rate for December 2025 through November 2026 of \$0.00038 per kWh, which is a 16 percent decrease compared to the current EITE surcharge rate.

2. Should Otter Tail's request to resume submitting its EITE update annually, beginning with the April 2026 filing, be approved?

The Department recommends that the Commission approve Otter Tail's request to change from a biennial EITE filing cadence to an annual EITE filing cadence, starting with the April 2026 filing.⁵ The Commission approved an annual cadence for OTP's EITE filings in its 17-257 Order.⁶ Otter Tail

⁵ Petition at 15.

⁶ [17-257 Order](#), Order, May 29, 2018, at Order Point 6.

proposed moving to a biennial cadence in Docket No. E017/M-22-174.⁷ The Commission approved the Company's request.⁸ OTP stated in the current Petition that returning to an annual cadence will improve regulatory oversight and enable more timely evaluation of the program's performance. The Department agrees with the Company's position on this issue.

3. Should Otter Tail's request to recover \$1,010,352 be approved?

The Department recommends that the Commission approve Otter Tail's request to recover \$1,010,352 net revenue requirement for December 1, 2025, through November 30, 2026. Based on the information provided and the Department's review, the net revenue requirement amount appears reasonable and consistent with costs eligible for recovery.

4. Should Otter Tail's proposed recovery factors be approved?

The Department recommends that the Commission approve Otter Tail's proposed recovery factors, as presented in the Petition. Based on the Department's review of the information provided, the proposed factors appear reasonable and appropriately aligned with the costs identified for recovery.

5. Are there other issues or concerns related to this matter?

The Department has not identified any other issues or concerns related to this matter.

B. COMPLIANCE WITH MINNESOTA STATUTES AND RULES

Minnesota Statutes § 216B.1696 includes four subparts. Subdivision 1 lists the definitions used in the statute. Subpart (c) lists the different customer types that are eligible for the EITE rate discount. Subdivision 2 provides the framework for an EITE rate schedule. Subpart (b) includes the requirement that the Commission shall approve an EITE rate schedule and corresponding rate only when the Commission has determined the proposed EITE rate schedule provides a net benefit to the utility or state. Subdivisions 3 and 4 address low-income funding and procedures for assessing the utility and costs of the program.

The Company included customer-specific information for the three customers it identified as being eligible for the rate schedule.⁹ Otter Tail also stated that each of those customers claim they need the 20 percent EITE rate discount to remain competitive. OTP also provided separate analyses of each of those customer's annual usage and cost of service under OTP's tariffed rate and compared that amount to other facilities owned by the same corporation.

⁷ *In the Matter of Otter Tail Power's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09*, Petition, April 11, 2022, at 7, Docket No. E017/M-22-174 (eDockets) [20224-184630-02](#).

⁸ *In the Matter of Otter Tail Power's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09*, Erratum Notice, November 29, 2022 at Order Point 5, Docket No. E017/M-22-174 (eDockets) [202211-190940-01](#).

⁹ Petition at 7.

The Department reviewed this information and finds it consistent with similar analyses developed and approved in prior EITE dockets.

Regarding the “net-benefits test”, OTP provided an analysis as well. The Department reviewed this analysis and finds it to be consistent with similar analyses developed and approved in prior EITE dockets.

The EITE Tracker, which the Company also submitted consists of a spreadsheet containing customer counts, tracker account development requirements and LIHEAP customer data.¹⁰ The Department’s review of that information finds it to be consistent with prior analyses.

Having completed its review, the Department acknowledges OTP has provided the information and analysis required under Minnesota Statutes § 216B.1696.

C. EITE CUSTOMER ELIGIBILITY, RATE DISCOUNT AND NET BENEFIT CALCULATION

The Department’s review of OTP’s proposal to renew its EITE Rate Schedule uses the three criteria the Commission used to determine if the Company’s proposed EITE rate schedule and EITE rate as filed is consistent with the requirement included in Minnesota Statutes § 216B.1696:

- Do the three customers requesting the EITE rate discount qualify for the Rider?
- Is the proposed rate discount for EITE customers appropriate?
- Is OTP’s calculation of the net benefit of retaining those three customers reasonable?

The Department provides a summary and analysis of these questions below:

C.1. Customer Eligibility

To qualify for an EITE rate discount under Minnesota Statutes § 216B.1696, a prospective customer must meet three requirements: (1) meet the definition of “Energy-intensive trade-exposed customer”,¹¹ (2) request the EITE rate discount;¹² and (3) provide enough firm-specific electric usage and demand information such that OTP can develop a “net benefits” test to determine if providing the prospective customer with an EITE rate discount will provide benefits to the utility.¹³

All three prospective customers self-identified as: 1) an oriented strand board manufacturer,¹⁴ 2) a sawmill,¹⁵ and 3) a sawmill,¹⁶ thereby meeting the definition of EITE customer.¹⁷ In addition, all three

¹⁰ Petition OTP **TRADE SECRET** Attachment 9.

¹¹ EITE statute, Subdivision 1,

¹² Petition at 13.

¹³ EITE statute, Subdivision 2(c).

¹⁴ Petition at 7.

¹⁵ Petition at 7.

¹⁶ Petition at 7-8.

¹⁷ EITE statute at 1(c)(2).

customers- West Fraser US EWP LCC,¹⁸ PotlatchDeltic,¹⁹ and Timberlyne Wood Products-²⁰ each provided an affidavit that included the firm-specific information Otter Tails requires to calculate its “net benefits” test.

The Department requested in Information Request (IR) No. 1 that OTP identify the rate group, revenue class, rate schedule(s), and rate code(s) applicable to each of the three EITE customers and indicate whether any changes have occurred since the Company’s 2021 filing. TRADE SECRET Attachment 13 contains that information.²¹ One of the Timberlyne Wood Products’ (formerly Cass Forest Products) accounts was billed on [TRADE SECRET DATA HAS BEEN EXCISED] at the time of the 2021 filing. That account is now billed on the [TRADE SECRET DATA HAS BEEN EXCISED]. The customer’s usage increased, causing them to qualify for the new rate code.

The Department concludes the prospective EITE customers provided adequate information to be classified as eligible for an EITE rate discount.

C.2 Is the 20% rate discount appropriate?

Each of the three prospective customers provided an analysis demonstrating that requiring them to pay OTP’s tariffed rates would result in their respective operations becoming less competitive.²² Those same prospective customers provided an analysis that demonstrated that a 20 percent discount on the Company’s tariffed rates made them more competitive relative to their peers. All three prospective customers also stated that not receiving the EITE rate discount would increase the probability that their facility may close due to no longer being competitive.

C.3 Is the Company’s calculation of the net benefit of retaining those three customers reasonable?

OTP provided a cost-benefit analysis in **TRADE SECRET Attachment 9**, which indirectly calculates the net benefit of retaining the three EITE rate discount customers. The Company’s approach is consistent with the protocol the Commission approved for determining the EITE program’s “net benefits test”.

Otter Tail begins by estimating that the lost margin associated with the 20% discount totals approximately \$2,963,298²³ for 2024. The Company then calculates the cost of the rate discount to non-EITE customers assuming the 20% rate discount. The Company’s estimate of that cost is \$1,127,443 for 2025-2026. Comparing the potential lost margin of approximately \$3.0 million to the cost of the EITE rate discount of \$1,127,443 results in a benefit/cost ratio of 2.6.²⁴ A benefit/cost ratio greater than 1.0 suggests the analysis is providing net benefits and should be pursued. Given that

¹⁸ Petition – TRADE SECRET Attachment 10 (West Fraser US EWP LCC).

¹⁹ Petition – TRADE SECRET Attachment 11 (PotlatchDeltic).

²⁰ Petition – TRADE SECRET Attachment 12 (Timberlyne Wood Products).

²¹ Petition – TRADE SECRET Attachment 13.

²² TRADE SECRET Attachments 10, 11 and 12.

²³ Petition OTP **TRADE SECRET** Attachment 5.

²⁴ \$2,963,298 annual benefit divided by \$1,127,443 annual cost = 2.63 benefit/cost ratio.

criterion, the Department concludes that the EITE Discount as currently proposed provides net benefits to OTP's non-EITE customers.

D. EITE TRACKER COMPONENTS

D.1. Proposed 2025-2026 Net Revenue Requirement/Tracker Balance

The Company is proposing a net revenue requirement of \$1,010,352 covering the period of December 1, 2025, through November 30, 2026.²⁵

The total revenue requirement before adjustments is \$1,127,443. This amount is reduced by a carrying charge adjustment of (\$3,826), which reflects the time value of money on the tracker balance, and by a true-up adjustment of (\$113,265) to account for the projected under-recovery for the current period. Together, these adjustments lower the net revenue requirement to \$1,010,352, resulting in a proposed EITE Surcharge Rate of \$0.0038 per kWh.²⁶

Table 1 below shows Otter Tail's Revenue Requirement from the current calculated time of January 2024 – November 2025, to their Proposed Revenue Requirement for December 2025 – November 2026.

Table 1: Otter Tail Power Company Proposed Revenue Requirement²⁷

	Current	Proposed
Revenue Requirements	Jan 2024 - Nov 2025	Dec 2025 - Nov 2026
Revenue Requirements	\$ 2,092,846	\$ 1,127,443
Carrying (Credi Charge)	1,509	(3,826)
True-up	63,437	(113,265)
Net Revenue Requirement	\$ 2,157,792	\$ 1,010,352

D.2. Rate Design

The EITE Rider rate design proposed by OTP for the December 2025 through November 2026 period appears to be consistent with the methodology approved by the Commission in the May 29, 2018, Order in Docket No. E017/M-17-257.²⁸ That Order established that the EITE surcharge should be calculated by dividing the Minnesota jurisdictional revenue requirement by forecasted retail sales for all customer classes, resulting in a uniform per-kWh charge to non-EITE customers.

In the current filing, OTP used a forecasted revenue requirement of \$1,010,352 and projected retail sales of 2,635,154,890 kWh to calculate a proposed surcharge of \$0.00038 per kWh.²⁹ This represents a decrease from the previously approved rate of \$0.00045 per kWh, reflecting both a lower revenue requirement and reduced forecasted sales. The Department has reviewed the Company's calculation

²⁵ Petition at 14.

²⁶ Ibid.

²⁷ Petition OTP **TRADE SECRET** Attachment 9.

²⁸ [17-257 Order](#), Order, May 29, 2018.

²⁹ Petition, Attachment 2 page 4 of 4.

and finds that it adheres to the tariff provisions established in Docket No. 17-257.³⁰ Accordingly, the Company's proposed rate design is consistent with the approved methodology and appropriately allocates EITE-related costs in a manner that maintains revenue neutrality.

D.3 Proposed 2025-2026 EITE Surcharge Rate for Non- Participating Customers

The Department has reviewed OTP's proposed 2025–2026 EITE Surcharge Rate of \$0.00038 per kWh for non-participating customers, as presented in the Company's Petition.³¹ This rate is based on a forecasted revenue requirement of \$1,010,352 and forecasted retail sales of 2,635,154,890 kWh.³² The Department finds that OTP's calculation is consistent with the methodology approved by the Commission in its May 29, 2018, Order in Docket 17-257.³³ Specifically, OTP has applied the appropriate formula by dividing the EITE tracker balance- reflecting the net revenue requirement adjustments- by the forecasted applicable sales volumes. This approach aligns with the tariffed procedure for establishing the EITE surcharge, as set forth in Section 13.09 of OTP's Electric Rate Schedule.³⁴ The Department notes that the proposed rate reflects a decrease from the previously approved rate of \$0.00045 per kWh, due to both a reduced revenue requirement and a slight decline in forecasted sales. Based on this review, the Department recommends that the Commission approve OTP's proposed 2025–2026 EITE Surcharge Rate.

The Company's current rate is in effect through November 2025. The Department notes the Petition is for the period of December 1, 2025, through November 30, 2026.

Table 2 below shows the Company's EITE Rate calculation.

Table 2: Otter Tail Power Company Proposed EITE Rider Rate Design³⁵

Rate per kWh	Otter Tail	Otter Tail (Proposed)
	January 2024 - November 2025	December 2025 - November 2026
Forecasted Retail Sales, all Classes	\$ 4,816,005,021	\$ 2,635,154,890
Minnesota 12-month Revenue Requirement	2,157,791	1,010,352
Rate per kWh	\$ 0.00045	\$ 0.00038

The proposed rate of \$0.00038 per kWh represents a decrease of approximately \$0.00006 from the current rate of \$0.00045 per kWh—a 15.56% decrease. For a residential customer using 1,000 kWh per month, this would result in an annual bill reduction of approximately \$0.78 annually.³⁶ The Department recommends approval of the proposed EITE surcharge rate.

³⁰ Ibid.

³¹ Petition at 1.

³² Petition, Attachment 2 at 4.

³³ [17-257 Order](#), Order, May 29, 2018.

³⁴ Otter Tail Power Company Electric Rate Schedule, Section 13.09.

³⁵ Petition OTP **TRADE SECRET** Attachment 9.

³⁶ Petition at 2.

D.4 Revenue Requirements, Rate Application and Impact

The May 29, 2018, Order in Docket E-017/M-17-257³⁷ specifies that the EITE surcharge applies to all eligible customer classes, with EITE customer usage capped at the 2016 baseline level. Usage above that baseline is excluded from surcharge recovery, preventing additional costs from being shifted to non-EITE customers. This structure ensures that cost recovery remains equitable and that the surcharge's impact on other customer classes is minimized. The Department recommends maintaining these provisions in future proceedings.

D.5 2023 and 2024 Actual Annual Sales to and Revenue from Customers Receiving EITE Discount

The Company provided 2023 and 2024 actual and weather-normalized annual sales data for EITE Customers in Attachment 4 of the Petition³⁸ including a detailed calculation of the variance from the baseline sales number. This baseline was set by the Commission in Points 5 and 6 of its May 29, 2018, Order in Docket No. E017/M-17-257³⁹, which also established that any increased revenues the Company receives because of the EITE discount must be refunded to customers paying the EITE Rider Surcharge Rate. Additionally, the Order requires the Company to provide annual reporting of sales and revenue data from EITE customers to enable effective oversight of the program. As the four-year discount term is not yet complete, the current data is submitted for tracking purposes only. Continued annual reporting will ensure transparency and allow the Department and Commission to assess and enforce any refund obligations once the term expires.

D.6 Costs Savings from Biennial Filing Cadence Credited to Customers

The Company's biennial filing cadence for EITE surcharge updates, as outlined in the Commission's November 21, 2022, Order in Docket No. 22-174⁴⁰ and further clarified by the Erratum Notice⁴¹ filed November 29, 2022, is designed to reduce administrative and operational costs associated with more frequent filings. The Erratum Notice specifically requires that any cost savings realized from this biennial filing schedule be credited back to customers through adjustments to the EITE surcharge. The Department supports this approach as it promotes efficiency and ensures that customers directly benefit from reduced regulatory costs. The Company should continue to track and report any cost savings resulting from the filing cadence and demonstrate that such savings are properly passed through to customers.

D.7 Customer Notification and Billing

The Company is required to provide clear and timely notification to customers receiving the EITE discount regarding the application of the surcharge and any changes to rates or terms. This

³⁷ [17-257 Order](#), Order, May 29, 2018.

³⁸ Petition, Attachment 4.

³⁹ [17-257 Order](#), May 29, 2018, at Order Point 5, 6.

⁴⁰ [22-174 Order](#), November 21, 2022.

⁴¹ [22-174 Erratum Notice](#), November 29, 2022.

requirement, as outlined in the Commission's May 29, 2018, Order in Docket No. E017/M-17-257⁴², ensures that customers understand how the surcharge is calculated and how it impacts their bills. Accurate billing reflecting the EITE Rider surcharge is essential for program transparency and customer confidence. The Company must continue to demonstrate adherence to these notification and billing obligations in future filings to maintain compliance with the Commission's directives.

The Company proposed the following Customer Notice language in the Petition's Attachment 7:

The Minnesota Public Utilities Commission approved our request to increase our Energy-Intensive Trade Exposed (EITE) Surcharge Rate. The approved rate of \$0.00038 per kilowatt-hour begins December 1, 2025, for all classes of customers subject to the charge.

This rider recovers costs associated with the State of Minnesota's energy policy to ensure competitive electric rates for EITE customers.

For more information, contact us at 800-257-4044 or visit otpc.com.

The Department has reviewed Otter Tail's Customer Notice language and finds that the first sentence of the notification should be changed. Otter Tail is proposing a decrease to the EITE Surcharge Rate, not an increase. Hence, the Department recommends revising the word 'increase' to 'decrease' in the first sentence of the Customer Notice found in Attachment 7.

D.9 Low-Income Outreach

The Commission's May 29, 2018, Order in Docket No. E017/M-17-257⁴³ includes provisions requiring the Company to conduct outreach to low-income customers as part of the EITE program. This outreach is intended to ensure that vulnerable populations are informed about available assistance programs, energy-saving resources, and options to help manage their energy costs. Effective communication and targeted engagement with low-income customers support equitable access to program benefits and help mitigate the financial impact of energy surcharges.

The Company's Petition⁴⁴ states it will deposit \$10,000 into an account established to fund a Commission-approved program pursuant to Minn. Stat. § 216B.1696, subd. 15. These funds are intended to support the expansion of outreach efforts for the Company's Commission-approved Uplift program.

⁴² [17-257 Order](#), May 29, 2018.

⁴³ [17-257 Order](#), May 29, 2018.

⁴⁴ Petition at 17.

E. 2025-2026 PROPOSED EITE RATE SURCHARGE

Otter Tail Power Company's Petition includes a summary of the annual EITE Rider Surcharge rates applied over the past several years, demonstrating the stability and consistency of the surcharge amounts. The proposed surcharge rate of \$0.00038 per kilowatt-hour for the 2025-2026 period aligns with this historical trend, reflecting adjustments based on updated revenue requirements and sales forecasts. This consistency supports the program's goal of providing predictable and equitable cost recovery while maintaining competitive rates for EITE customers.

The Department finds the proposed surcharge rate reasonable and consistent with prior years' filings, continuing to balance the interests of EITE customers and the broader customer base and recommends approval.

F. ANNUAL FILING PROPOSAL

In this Petition, Otter Tail proposes to return to an annual filing schedule for their EITE updates for simplicity and transparency.

The Department has reviewed the request and notes that the Commission, in its May 29, 2018, Order (Docket No. E017/M-17-257)⁴⁵, approved annual EITE filings. In a subsequent Erratum Notice Order⁴⁶ issued on November 29, 2022, in Docket No. E017/M-22-174, the Commission approved the Company's request to shift to biennial filings. The Company now proposes to return to an annual filing schedule. While the Department understands that filing approaches may evolve over time, it emphasizes the importance of consistency in reporting to support effective regulatory oversight and provide predictability for all stakeholders. Given the increased transparency afforded by more frequent filings, and considering the Commission's original directive, the Department supports the proposed return to annual updates and recommends maintaining this schedule on an ongoing basis.

IV. DEPARTMENT RECOMMENDATIONS

The Department recommends the Commission take the following action:

- Approve Otter Tail's EITE Surcharge Rate of \$0.00038 per kWh for the period of December 2025 through November 2026.
- Approve Otter Tail's Proposed Revenue Requirement of \$1,010,352.
- Approve Otter Tail's request to return to an annual filing schedule for the EITE updates.

⁴⁵ [17-257 Order](#), May 29, 2018.

⁴⁶ [22-174 Erratum Notice](#), November 29, 2022.

- Recommend Otter Tail update the Customer Notice as discussed above.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. E017/M-25-201

Dated this **26th** day of **August 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-201
2	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-201
3	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-201
4	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	M-25-201
5	Paula	Foster	pfoster@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	M-25-201
6	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-201
7	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-25-201
8	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-201
9	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-201
10	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-201
11	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-201
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-201
13	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-201

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-25-201
15	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	M-25-201
16	Jordan	Sillerud	jsillerud@otpc.com	Otter Tail Power Company		215 South Cascade St. PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	M-25-201
17	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-25-201
18	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-201