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March 26, 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 29, 2019 and reported customer contacts from July 1, 2019 through September 30, 2019. The third report was filed on February 21, 2020 covered the period from October 1, 2019 through December 31, 2019.

On March 3, 2020 Commission Staff filed a Comment Notice recommending terminating the compliance filings and migrating the reporting requirement on complaints to the annual safety, service reliability, and service quality report, with a reporting threshold of five or more complaints related to the pro-rated customer charge received in a calendar quarter.

On March 18, 2020 the Minnesota Department of Commerce, Division of Energy Resources (Department) filed comments supporting Commission Staff's recommendations. The Department also requested that the Company briefly explain in reply comments the nature of customer questions concerning pro-ration of the customer charge and how these questions were resolved.

In response to the Department's request, Otter Tail considers the inquiries to fall into two general categories. The first category involved questions about what proration was and when it began. The second category concerned the general appearance of the bill. Customers identified that something looked different and that led to the inquiry. For both categories of questions Otter Tail customer service representatives responded to the customer by explaining the purpose of the changes and how they were presented on the bill.

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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

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 26th day of March, 2020

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

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_18-380_M-18-380
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
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_18-380_M-18-380
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_18-380_M-18-380
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Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	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