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December 18, 2024



Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

**RE: In the Matter of Commission Consideration and Determination of Otter Tail Power Company's Plan to Meet the Small-Scale SES Compliance
Docket No. E017/M-23-338**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Petition in the above-referenced matter.

The information marked below consists of confidential competitive pricing information (the "Protected Data"). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by Otter Tail Power to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8639 or jgrenier@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Retail Energy Solutions

sjw
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Commission
Consideration and Determination of
Otter Tail Power Company's Plan to
Meet the Small-Scale SES Compliance**

Docket No. E017/M-23-338

SUMMARY OF FILING

With the goal of meeting Minnesota's Solar Energy Standard's small-scale requirement,¹ in early 2024 Otter Tail Power Company (Otter Tail Power or the Company) requested and the Commission approved the Company to construct, operate and own fifteen small-solar arrays.² Otter Tail Power has completed construction of all fifteen projects. In continuance of this goal, Otter Tail Power proposes to construct, operate, and own an additional fifteen small-solar arrays on either Otter Tail Power or customer properties. Following the completion of this second group of fifteen small-scale projects, going forward, to meet customer interests, Otter Tail Power requests approval of a formal Customer Hosted Solar program that will allow the Company to build and own up to forty small-scale solar systems on customer property for a ten-year period starting in 2026 through and concluding in 2035. Otter Tail Power proposes to allocate all output and costs associated with the second group of fifteen projects and the proposed additional forty Company-owned small-solar systems to Minnesota, with recovery through its Renewable Resource Cost Recover Rider (RRCR).

¹ Minn. Stat § 216B.1691, subd. 2f(c).

² MPUC Docket No. E017/M-23-338, January 26, 2024 Order.

**STATE OF MINNESOTA
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**Docket No. E017/M-23-338
PETITION**

I. PETITION SUMMARY

With the goal of meeting Minnesota's Solar Energy Standard's small-scale requirement,¹ in early 2024 Otter Tail Power Company (Otter Tail Power or the Company) requested and the Commission approved the Company to construct, operate and own fifteen small-solar arrays.² Otter Tail Power has completed construction of all fifteen projects. In continuance of this goal, Otter Tail Power proposes to construct, operate, and own an additional fifteen small-solar arrays on either Otter Tail Power or customer properties. Following the completion of this second group of fifteen small-scale projects, going forward, to meet customer interests, Otter Tail Power requests approval of a formal Customer Hosted Solar program that will allow the Company to build and own up to forty small-scale solar systems on customer property for a ten-year period starting in 2026 through and concluding in 2035. Otter Tail Power proposes to allocate all output and costs associated with the second group of fifteen projects and the proposed additional forty Company-owned small-solar systems to Minnesota, with recovery through its Renewable Resource Cost Recover Rider (RRCR).

II. INTRODUCTION

In response to the Minnesota Public Utility Commission's (Commission) January 26, 2024 Order,³ Otter Tail Power has been focused on building low-cost small-scale solar projects in Minnesota, with the goal of meeting small-solar compliance. The Company has demonstrated its commitment to this goal by constructing fifteen small-solar projects in 2024, with four projects being on customer-owned property. From a small-solar standpoint, these projects are very low-cost projects. The Company proposes to continue its path towards Minnesota small-solar compliance by constructing,

¹ Minn. Stat § 216B.1691, subd. 2f(c).

² MPUC Docket No. E017/M-23-338, January 26, 2024 Order.

³ *Id.*

operating, and owning an additional fifteen small-solar arrays on either Otter Tail Power or customer properties. Going forward upon completion of the fifteen projects, to meet customer interest, Otter Tail Power requests approval of a formal Customer Hosted Solar program that will allow the Company to build and own up to forty additional small-scale solar systems on customer property to be constructed during the ten-year period beginning in 2026 through 2035. Otter Tail Power proposes to allocate all output and costs associated with the additional fifteen projects and the forty Customer Hosted Solar small-solar systems solely to Minnesota, with recovery through its RRCR.

III. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, subp. 1, a one-paragraph summary of the filing accompanies this Petition.

IV. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, subp. 3, the following information is provided.

A. Name, address, and telephone number of utility

(Minn. Rules 7829.1300, subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney

(Minn. Rules 7829.1300, subp. 3(B))

Lauren Donofrio
Senior Associate General Counsel – Regulatory
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8774

C. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, subp. 3(E))

Jason Grenier
Manager, Retail Energy Solutions
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8639

D. Service List

(Minn. Rules 7829.0700)

Otter Tail Power requests that the following persons be placed on the Commission's official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail Power:

Jason Grenier
Manager, Retail Energy Solutions
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jgrenier@otpc.com

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215 South Cascade Street
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Regulatory Filing Coordinator
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Fergus Falls, MN 56538-0496
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E. Service on other parties

(Minn. Rules 7829.1300, subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, subp. 2, Otter Tail Power served a copy of this Petition on the Division of Energy Resources of the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, subp. 1 was served on all parties on Otter Tail Power's general service list.

V. BACKGROUND

The Commission’s January 26, 2024 Order in the current docket, included five ordering points. Specifically, ordering point number two approved the Company’s proposal to invest in up to fifteen OTP-owned small, 40 kilowatts or less, solar projects. Ordering point number four of the Commission’s order, “Authorized OTP to recover future costs of OTP-owned small-solar projects through the RRCR rider with a full allocation to Minnesota of the output and costs (with a resulting reduction of the market energy purchases and costs), subject to Commission review and approval of specific costs to be presented by OTP in a future petition under Minn. Stat. § 216.1645, subd. 2a, or in a general rate case.”

Otter Tail Power procured project equipment through the spring of 2024 and initiated construction through the summer and fall of 2024. Final commissioning of the fifteenth and final site, occurred in November of 2024. All fifteen sites, four of which are on customer premises, are currently fully functional and producing energy.

Otter Tail Power’s June 27, 2024 Compliance filing to the Commission in this docket presented progress, strategies, and included forecasts on how Otter Tail Power could gain compliance for the small-solar system carve-out. The Company will discuss the forecasts it previously filed later in this filing.

VI. REQUEST TO BUILD FIFTEEN COMPANY-OWNED SMALL-SOLAR ARRAYS

A. Value of Otter Tail Power-Owned Small-Scale Solar Systems

The Company is making it a priority to meet Minnesota’s Solar Energy Standard’s small-scale compliance requirements in a timely manner. Building small-scale solar arrays is not an investment strategy for the Company. Otter Tail Power must balance the priority of several different types of projects as they compete for valuable capital dollars, however, the Company recognizes that building these systems delivers value to Otter Tail Power’s customers through several channels.

The first value channel is cost-effectiveness. Otter Tail Power has been able to build small-solar systems at a very low cost. The energy from these systems flows directly into the Minnesota distribution grid and is shared by all of the Company’s Minnesota customers. These small systems also generate low-cost renewable energy credits (RECs) to meet small-scale solar compliance. The alternative to gain compliance would be purchasing RECs from other small systems to the extent they

are available, assuming Commission approval;⁴ REC purchases would be considerably more expensive for Otter Tail Power customers.

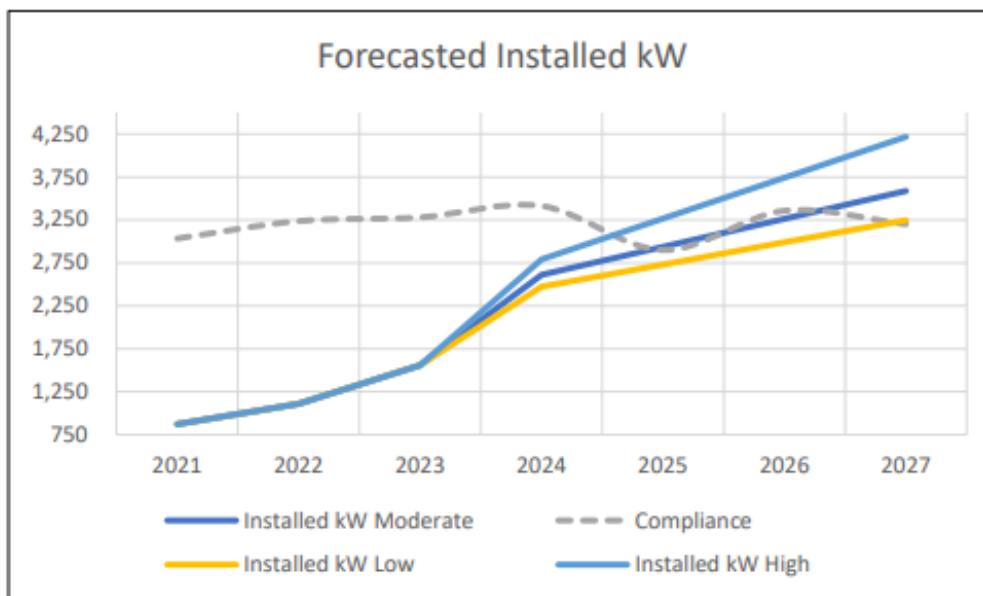
The second value channel is raising awareness. Building small-solar in Otter Tail Power communities is an excellent way to demonstrate and generate interest in solar in rural Minnesota. Many companies, communities, and customers are interested in renewable energy and want a simple way to be part of the energy transition to renewable resources. Although these systems are “small” they can deliver a large impact to these communities. These systems can pique local interest in renewable energy and be the beginning of renewable energy conversations. The projects demonstrate how Otter Tail Power and the entire state of Minnesota is creating a vision for the future as we transition to more renewable energy resources that fuel our economy. They also prove that solar can be a viable energy resource, even in northern Minnesota communities. The Company has included Attachment 1 that shows a map of all fifteen currently producing small-solar locations and includes photographs of each project.

The third value channel is in managing public perceptions of value and concerns over siting. The small systems constructed and owned by Otter Tail Power provide a simple, low-impact, local renewable energy solution. Otter Tail Power can strategically place these systems where they will have minimal impact to neighboring properties or the coveted view of rural landscapes. In many cases Otter Tail Power has had to gain conditional use permits through public hearings in front of local zoning authorities and has not faced any opposition from the public. Communications with neighboring landowners has mostly consisted of informational inquiries. Overall, stakeholders have been very supportive of these systems. Overall, stakeholders understand Minnesota’s clean energy goals and know these systems support the state achieving those goals.

B. Need for Additional Small-Solar Systems to Meet Compliance

The Company’s June 27, 2024 Compliance filing included Chart 1, as seen below, and illustrates three forecasts for meeting small-solar compliance. Based on assumptions at the time, Otter Tail Power’s moderate installed kilowatts forecast resulted in small-solar compliance occurring in the 2026-2027 timeframe.

⁴ MPUC Docket No. E017/M-23-338, January 26, 2024 Order.

Chart 1:

In the June 27, 2024 Compliance filing the Company was optimistic that between Minnesota Solar for Schools, Solar on Public Buildings, Otter Tail Power’s Publicly Owned Property (POP) Solar program, Inflation Reduction Act Direct Pay, and other organic customer projects, the Company would meet small-solar compliance by 2027. However, the Company has found that all customer projects take much longer to materialize than previously estimated.

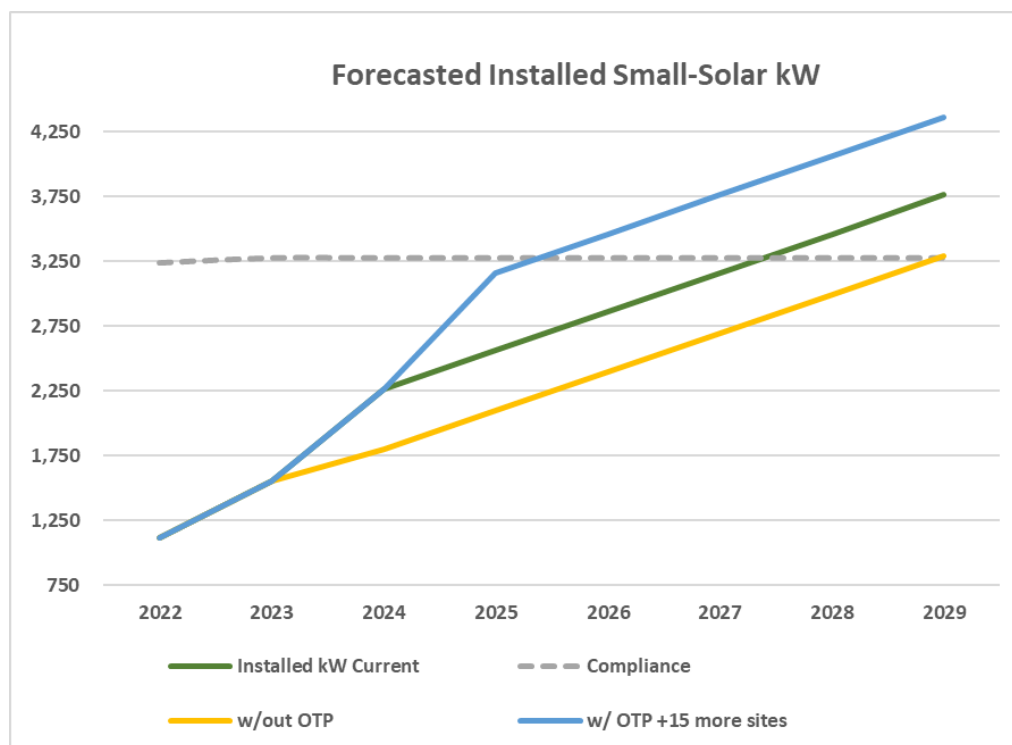
Otter Tail Power’s initial understanding of the Solar on Public Buildings program was that all Minnesota public buildings were eligible. After a deeper dive into the legislation, the Company found its understanding was incorrect and the Solar on Public Buildings program is only for public buildings in Xcel Energy’s service area. Additionally, the Made in Minnesota Solar program, started in 2014, allows payment to customers for ten years. At the end of their ten-year contract, the customer now has the option to keep their RECs or keep selling to Otter Tail Power. The Company is trying to be proactive by contacting participating customers and offering to continue to purchase their RECs, but ultimately, customers no longer have an obligation to do so. This adds more uncertainty and potential to lose RECs from existing small-solar projects.

The Company has experienced that the Solar for Schools program takes longer than originally expected for a project to be realized. Schools have to work through the grant process with the State of Minnesota, issue bids to solar developers, gain approval from internal stakeholders, and gain interconnection

and other permits. It is understandable that these activities take considerable time, since they are not part of a school's typical business operations.

The Company is also finding that the majority of solar projects are being built through the summer months and usually are not commissioned until late in the year. This means the projects have very little production for the first year and cannot help in meeting compliance until about eighteen months later. For example, Otter Tail Power's fifteen company-owned systems were finally commissioned in November of 2024. These systems will have very little energy produced in 2024, and will not have substantial REC production until 2025, which will not be eligible for reporting toward the small-solar goal until the Company files its renewable energy compliance filing on June 1, 2026.

Otter Tail Power's latest forecast for meeting small-solar compliance is shown below in Chart 2. Otter Tail Power is projecting about 300 kW of small-solar added annually through organic growth. As shown by the green line below, after the addition of the fifteen Otter Tail Power-owned systems, the Company expects to meet compliance in the 2028-2029 range since production typically lags one year. As shown by the blue line in Chart 2, by adding another fifteen small-solar arrays, the Company would add approximately 600 kW (15 systems at 40 kW each) of solar production that would be eligible to help meet compliance with our June 1, 2027, renewable energy compliance filing. This opportunity would accelerate the Company's compliance by approximately two years, with compliance projected by 2026.

Chart 2:

Not only would allowing the Company to build these additional projects accelerate compliance, doing so would make reaching compliance more certain. By building these systems itself, Otter Tail Power also removes the risk of relying on customers to construct systems in a timely manner for Otter Tail Power compliance. Taking this accelerated approach will allow the Company to make up for any shortfall it has in meeting the small-scale solar compliance requirements for 2024 and its next several compliance filings for the Minnesota solar energy standard.

VII. CUSTOMER HOSTED SOLAR PROGRAM

In 2024, of the fifteen small-solar arrays Otter Tail Power constructed, four of them are on customer-owned property. These locations include Bemidji State University (Beaver Solar), Northwest Technical College in Bemidji, Sanford Bemidji Medical Center, and Brunswick (Lund) Boats in New York Mills, Minnesota. At these sites Otter Tail Power placed solar on the customer's premise and connected the solar on Otter Tail Power's side of the meter. For customers offering their land to support solar, they become a partner in the renewable energy transition and showcase this partnership to the entire community.

The Company has found that customers are reluctant to pursue solar projects, even at no cost, when they have to do so independently of the local utility. For example, one of the customers who hosted one of Otter Tail Power's small-solar arrays would have also qualified for the Solar for Schools program, the POP program, and the Direct Pay benefits through Investment Tax Credit. Participation in these programs would have resulted in making the solar project zero cost to the customer and would have provided behind the meter energy. Nevertheless, the customer opted not to pursue a small-solar project. The customer preferred the ease of the Otter Tail Power customer-hosted solar option. Otter Tail Power's option was attractive to the customer because they were able to work with someone they trust (their long-term energy provider), who would procure the equipment, gather permits, complete interconnection agreements, construct, operate, and maintain the system at a low-cost. This model offers customers a no-hassle approach where they can easily host a small-solar system, which showcases their commitment to renewable energy in the local community.

Otter Tail Power proposes to the Commission, an ongoing program for building and owning up to forty small-solar arrays on a customer's premises to be constructed over a ten-year period from 2026-2035. Otter Tail Power proposes the production, and project costs will be allocated to its Minnesota customers and recovered through the RRCR, similarly to other Company-owned small-solar projects.

The Customer Hosted Solar option allows the Company to meet its customers' interest in having on-site solar, but removes the hassle of developing, interconnecting, and maintaining these systems. Otter Tail Power's proposal of adding forty customer-hosted solar arrays over ten years averages out to only four small-solar projects annually. To maximize economies of scale, the Company would manage a queue of interested customers until a group of five to ten projects are ready to proceed. The Company would then start the procurement and building process by leveraging purchasing power for equipment and installation services. Our goal is to provide customers with a new product while balancing cost to all customers. Limiting participation to up to forty or less projects over a ten-year span will result in minimal impact on Minnesota customer rates, align with Minnesota's goals of building small-solar arrays, provide a desired customer option, and further enable small-solar to be demonstrated throughout rural western Minnesota.

VIII. SMALL-SOLAR COSTS

Otter Tail Power has been able to strategically place several of the small-solar arrays in areas that offer bonus Investment Tax Credits (ITC). These bonus ITCs have helped to further lower the overall cost of these projects for our customers. Not including ITCs, Otter Tail Power has been able to complete the fifteen Company-owned small-solar arrays for approximately **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]**. By comparison, over the last year, non-Company-owned small-solar projects developed by customers have averaged approximately **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]**. Otter Tail Power has proven its projects are low-cost small-scale solar projects. In addition, once ITCs are factored in, Otter Tail Power's project costs are another thirty to forty percent lower depending on location of the array for ITC eligibility.

For the Customer Hosted Solar program proposal, the Company believes projects should only be pursued where the costs are in alignment with previous low-cost projects. The Company works diligently to minimize cost impacts to customers and believes guard rails should be included for its future small-scale solar projects. Going forward, over the next ten years, inflationary pressures and possible discontinuation of the ITC could increase project costs. The Company proposes that as long it remains within its average 2024 \$/kW costs adjusted for inflation, any discontinuation of the ITC, and a fifteen percent contingency, the Company shall be permitted to build and recover the costs of up to forty customer-hosted solar projects through its RRCR from 2026 through 2035.

IX. CONCLUSION

The Company proposes to continue its path towards Minnesota small-solar compliance by constructing, operating, and owning an additional fifteen small-solar arrays on either Otter Tail Power or customer properties starting in 2025. Going forward, to meet customer interests, we request Otter Tail Power have the option of a formal Customer Hosted Solar program that will allow the Company to build and own up to forty small-solar systems on customer property with construction from 2026 through 2035, a ten-year period.

The Company requests the Commission to approve its proposal to:

1. Build, operate and own an additional fifteen small-scale solar arrays placed on Company or customer property, with construction beginning in 2025.

2. Create a customer program, called Customer Hosted Solar, which allows the Company to build, operate and own up to forty small-scale systems placed only on customer property constructed during a ten-year period from 2026 through 2035.
 - For cost recovery purposes, Customer Hosted Solar projects will be in alignment with the Company's 2024 small-scale solar projects' cost per kilowatt, adjusted for inflation, possible discontinuation of ITC, and allow for a fifteen percent contingency.
3. All costs and production from the additional fifteen small-solar projects and up to forty customer-hosted small-solar projects, will be allocated to Minnesota customers with recovery through Otter Tail Power's RRCR.

Dated: December 18, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON GRENIER

Jason Grenier

Manager, Retail Energy Solutions

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8639

jgrenier@otpc.com



2024 New Solar Sites:

1. Karlstad Solar
2. Viking Solar
3. Brooks Solar
4. Crookston Solar
5. Red Lake Falls Solar
6. Beaver Solar, Bemidji State University
7. NTC Solar, Northwest Technical College, Bemidji
8. Sanford Solar, Sanford Medical Center, Bemidji
9. Callaway Solar
10. Brunswick Solar (Lund Boats), New York Mills
11. Taplin Gorge Solar, Fergus Falls
12. Edgetown Solar, Fergus Falls
13. Wall Lake Solar, Underwood
14. Dalton Solar
15. Appleton Solar

Karlstad Solar



Viking Solar



Brooks Solar



Crookston Solar



Red Lake Falls Solar



Beaver Solar, Bemidji State University



NTC Solar, Northwest Technical College, Bemidji



Sanford Solar, Sanford Medical Center, Bemidji (Customer Hosted)



Callaway Solar



Brunswick Solar (Lund Boats), New York Mills





Taplin Gorge Solar, Fergus Falls



Edgetown Solar, Fergus Falls



Wall Lake Solar, Underwood



Dalton Solar



Appleton Solar



CERTIFICATE OF SERVICE

**RE: In the Matter of Commission Consideration and Determination
of Otter Tail Power Company's Plan to Meet the Small-Scale SES
Compliance
Docket No. E017/M-23-338**

I, Stacy Wahlund, 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
Initial Filing for Solar Resources**

Dated this **18th** day of **December, 2024**.

/s/ STACY WAHLUND
Stacy Wahlund
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8338

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3	Matthew	Brodin	mbrodin@allate.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-338Official
4	Richard	Burud	rgburud@msn.com	Southern Minnesota Energy Cooperative		31110 Cooperative Way Rushford MN, 55971 United States	Electronic Service		No	23-338Official
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7	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	23-338Official
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12	Jason	Grenier	jgrenier@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official

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15	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-338Official
16	Casey	Jacobson	cjacobson@bepc.com	Basin Electric Power Cooperative		1717 East Interstate Avenue Bismarck ND, 58501 United States	Electronic Service		No	23-338Official
17	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
18	Nate	Jones	njones@hcpd.com	Heartland Consumers Power		PO Box 248 Madison SD, 57042 United States	Electronic Service		No	23-338Official
19	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	23-338Official
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22	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	23-338Official
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25	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-338Official
26	Ben	Nelson	benn@cmpasgroup.org	CMMPA		459 South Grove Street Blue Earth MN, 56013 United States	Electronic Service		No	23-338Official
27	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and		200 1st Street SE PO Box 351	Electronic Service		No	23-338Official

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
				Light Company		Cedar Rapids IA, 52406-0351 United States				
28	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
29	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
30	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	23-338Official
31	John	Richards	johnrichards@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine St. Grantsburg WI, 54840 United States	Electronic Service		No	23-338Official
32	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-338Official
33	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-338Official
34	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-338Official
35	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-338Official
36	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-338Official
37	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official
38	Mikayala	Thompson	mmthompson@otpc.com	Otter Tail Power Company		null null, null United States	Electronic Service		No	23-338Official
39	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	23-338Official
40	Carol	Westergard	cwestergard@otpc.com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-338Official