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April 27, 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 Initial Petition for 2020 Annual Automatic Adjustment of Charges Report – Electric Minnesota Rules 7825.2800 – 7825.2840
Docket No. E999/AA-20-171
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company hereby submits to the Minnesota Public Utilities Commission Reply Comments in the above described matter.

Otter Tail appreciates the Minnesota Department of Commerce Division of Energy Resource's (Department) analysis and review of the July 2018 – December 2019 Annual Automatic Adjustment of Charges Report as filed on April 15, 2020 in the above referenced Docket. Otter Tail supports the recommendations of the Department and request's Commission approval of Otter Tail's:

Auditor Report, Transformer Reporting, MISO Day 2 Reporting, Asset-Based Margins, and ASM Charges along with all other filing requirements.

If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpc.com.

Sincerely,

/s/ *STUART TOMMERDAHL*
Stuart Tommerdahl
Manager, Regulatory Administration

kaw
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: 2020 Annual Automatic Adjustment of Charges Report - Electric
Minnesota Rules 7825.2800 – 7825.2840
Docket No. E999/AA-20-171**

I, Kim Ward, 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 Letters of Availability to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company
Reply Comments**

Dated: April 27, 2020

/s/ KIM WARD

Kim Ward
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8268

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_20-171_AA-20-171
Daniel	Beckett	daniel.beckett@state.mn.us	Department of Commerce	85 7th Pl E #500 Saint Paul, Minnesota 55101	Electronic Service	No	OFF_SL_20-171_AA-20-171
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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_20-171_AA-20-171
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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_20-171_AA-20-171
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