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June 23, 2025



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

**RE: In the Matter of Cold Weather Reports (CWR) – Regulated Gas & Electric Companies
Docket No. E, G999/PR-25-2
Supplemental Comments**

Dear Mr. Seuffert:

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

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 218-739-8443 or ckremeier@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ *COLLIN KREMEIER*

Collin Kremeier

Supervisor, Customer Care Administrative & Outage Management

amn

Enclosures

By electronic filing

c: Service List

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

**In the Matter of Cold Weather
Reports (CWR) – Regulated Gas
& Electric Companies**

**Docket No. E999/PR-25-02
SUPPLEMENTAL COMMENTS**

I. INTRODUCTION

On February 28, 2025 the Minnesota Public Utilities Commission (Commission) issued notice of a comment period to review issues:

1. Should the Commission take any action on the residential customer status data reported in Docket No. E, G-999/PR-25-2, including service disconnections, payment arrangements, and various customer protections and assistance?
2. Should utilities be required to develop disconnection and payment arrangement policies and make them public? Once the policies are developed, should there be any other modifications made to them?

The notice also offered utilities the ability to respond to comments submitted to by Citizen Utility Board (CUB) and Legal Services Advocacy Project (LSAP).

Per Appendix A, Request #1, would your utility submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements?

- Per Appendix A, Request #2, would your utility display its disconnection, service deposit, and payment agreement policies and practices on your website, and explain those procedures in clear, easy-to-understand language?
- Per Appendix A, Request #3, would your utility post the mock language from CUB and LSAP on its website?
- As CUB and LSAP have only recommended the actions listed in Appendix A, and these actions have not been Ordered by the Commission, if your utility would not voluntarily comply with the Requests 1-3, please discuss why doing so is unfeasible or inappropriate.

The February 28, 2025, notice also included the following topics for parties:

Considering the data filed in Docket No. E, G-999/PR-25-2, should any trends in the data be highlighted for the Commission?

- What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?
- What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?
- How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language?
- Considering Staff's information request (IR) for Xcel filed on December 20, 2024 in Docket No. E, G-999/PR-24-22 and Xcel's IR responses on February 7, 2025, 3 are the utilities following the CWR appeal process in Minn. Stat. 216B.096, Subd. 8?
- Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1-April 30), including site visits before any disconnections for

On May 14, 2025, Otter Tail Power submitted reply comments providing responses to the topics for utilities submitted by Citizen Utility Board (CUB) and Legal Services Advocacy Project (LSAP).

On May 15 2025, The Department of Commerce requesting the utilities file supplemental comments for items C.4, C6 and asked Otter Tail Power to reply to C7. Otter Tail Power Company's responses are below.

II. OTTER TAIL RESPONSES

- How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language?

Otter Tail Power has implemented several measures to improve communication regarding disconnection and payment arrangement policies for non-English speakers, especially those who do not read their native language. We have added language

translation options on our website, including Spanish, Chinese (simplified and traditional), and Somali. For background, Otter Tail Power has provided data through the COVID-19 pandemic docket indicating that 93 percent of counties within our service territory speak English at home. Additionally, Spanish is spoken in just over 3 percent of households. These figures are based on the 2019 American Community Survey conducted by the US Census Bureau.

Otter Tail Power also utilizes company employees who speak Spanish to assist customers who call with inquiries. We are currently researching additional options for phone translation services to enhance our communication capabilities further.

- Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1-April 30), including site visits before any disconnections for non-payment? How are utilities ensuring that its records of heat-affected customers are accurate?

Otter Tail Power adheres to the provisions set forth in Minn. Stat 216B.096, ensuring that customers receive appropriate protections during the Cold Weather Rule (CWR) season. The following outlines the measures implemented to safeguard customers:

Otter Tail Power follows a structured collection process, which includes multiple steps to ensure effective communication with customers. The table below illustrates our collection process.

Days from Billing	Utility Action
Day 0	First bill is produced
Day 30	Second bill is produced
Day 35	Disconnect notices for arrears is produced and Cold Weather Protection brochure is mailed
Day 43	Automated Call to Customers
Day 50	Automated Call to Customers
Day 54	Cold Weather Visit 1 Service Order is Generated
Day	Cold Weather Visit 2 Service Order is Generated
Day 57	Disconnection date

Otter Tail Power's Cold Weather Brochure is mailed to customers each year prior to the commencement of the CWR season.

Personal visits are made to customer properties to attempt direct contact. The necessity of a second after-hour visit is contingent upon whether we made contact with the customer on the initial field personnel visit.

In all interactions, the following additional financial resources are discussed with customers:

- Energy Assistance
- Uplift Program
- Energy Efficiency efforts
- County Programs

Otter Tail Power acknowledges the inherent link between the disconnection of electrical service and the potential impact on customers utilizing alternative heating sources. Although we do not segregate customers by heat-affected or non-heat affected status based on rate options, we universally consider customers as heat affected during the CWR season.

III. CONCLUSION

Otter Tail Power appreciates the opportunity to submit comments. We continue to be committed to our customers and providing them with a great customer experience. We look forward to continuing our efforts to support our customers.

Dated: June 23, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ COLLIN KREMEIER

Collin Kremeier

Supervisor, Customer Care

Administration & Outage Management

Otter Tail Power Company

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CERTIFICATE OF SERVICE

**RE: In the Matter of Cold Weather Reports (CWR) – Regulated Gas & Electric
Companies
Docket No. E, G999/PR-25-2**

I, Anahita Narimani, 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.

**Otter Tail Power Company
Supplemental Comments**

Dated this **23rd** day of **June 2025**.

/s/ Anahita Narimani

Anahita Narimani, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8363

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	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	PR-25-2
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
6	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
7	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Ron	Elwood	relwood@mnlsap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
9	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	PR-25-2
10	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
12	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
13	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
14	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0496 United States				
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
17	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
19	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
20	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	PR-25-2
21	Jodi	Schinzing	jodischinzing@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
22	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	PR-25-2
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2