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February 1, 2021



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

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

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Customer Eligibility, Updated Baseline and Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate, Rate Schedule 13.09  
Docket No. E017/M-21-  
Initial Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits its Petition to the Minnesota Public Utilities Commission (Commission) for approval of its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09.

This Petition contains information that is protected by the Minnesota Data Practices Act. That information 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 efforts by Otter Tail to protect the information from public disclosure. Otter Tail maintains this information as a trade secret based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. For this reason, Otter Tail asks that the data be treated as non-public data pursuant to Minn. Stat. § 13.37, subd. 1(b). The enclosed are marked as **NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE** and **PUBLIC – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED**. The information designated as non-public herein concerns energy usage of specific customers. Docket No. E,G999/CI-12-1344 addresses the confidential, non-public nature of this data.

Otter Tail has electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, Subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General-Antitrust & Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's general service list. A Certificate of Service is also enclosed.

Mr. Seuffert  
February 1, 2021  
Page 2

If you have any questions regarding this filing, please contact me at 218-739-8819 or at [dmandelke@otpc.com](mailto:dmandelke@otpc.com).

Sincerely,

*/s/ DARLENE C. MANDELKE*  
Darlene C. Mandelke, Rates Analyst  
Regulatory Administration

cjh  
Enclosures  
By electronic filing  
c: Service List

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

**In the Matter of Otter Tail Power  
Company's Petition for Approval of the  
Customer Eligibility, Updated Baseline  
and Annual Update to its Energy-  
Intensive, Trade-Exposed Rider  
Surcharge Rate, Rate Schedule 13.09**

**Docket No. E017/M-21-  
SUMMARY OF FILING**

On February 1, 2021, Otter Tail Power Company (Otter Tail or Company) filed a petition with the Minnesota Public Utilities Commission for approval of its renewal of customer eligibility, updated baseline and annual update to the Energy-Intensive, Trade-Exposed (EITE) Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09.

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

**In the Matter of Otter Tail Power  
Company’s Petition for Approval of the  
Customer Eligibility, Updated Baseline  
and Annual Update to its Energy-  
Intensive, Trade-Exposed Rider  
Surcharge Rate, Rate Schedule 13.09**

**Docket No. E017/M-21-  
PETITION OF OTTER TAIL POWER  
COMPANY**

**I. INTRODUCTION**

Otter Tail Power Company (Otter Tail or Company) submits this Petition to the Minnesota Public Utilities Commission (Commission) under Minn. Stat. § 216B.1696 (EITE Statute) for approval of its renewal of four-year customer eligibility, updated baseline, and annual update (Update) to its Energy-Intensive, Trade-Exposed (EITE) Rider (EITE Rider) Surcharge Rate under Otter Tail’s Rate Schedule 13.09.

This filing is Otter Tail’s first update to the renewal of four-year customer EITE eligibility and update to EITE customer baseline. The first four-year eligibility expires on November 30, 2021, and the proposed new eligibility period is effective on December 1, 2021.

This filing is Otter Tail’s third update to the EITE Surcharge Rate and reflects the EITE Rider revenue requirements for the next proposed recovery period, December 1, 2021, through November 30, 2022. The update includes the tracker balance estimated for the end of the current recovery period to minimize the over-or-under-recovery of the EITE Rider costs. The proposed effective date of the updated EITE Surcharge Rate is December 1, 2021.

The revenue requirement for the recovery period upon which the rate was developed is \$1,015,245 which includes the tracker balance at the end of November 2021 of \$51,580. This update results in a change to the EITE Surcharge Rate from \$0.00033 per kWh currently in effect to \$0.00039 for the recovery period beginning December 1, 2021. For a residential customer using 1,000 kWh per month, the bill impact is an increase of \$0.06 per month which is \$0.72 annually.

Also, included in this filing is the 2020 annual report of sales to and revenue from Otter Tail's EITE-customers. This information is provided in Attachments 5 through 7.

## **II. SUMMARY OF FILING**

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

## **III. 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))

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, Minnesota 56538-0496  
(218) 739-8956

**C. Date of filing and proposed effective date of rates**

(Minn. Rules 7829.1300, Subp. 3(C))

The date of this filing is February 1, 2021. Otter Tail requests that the proposed eligibility, baseline and EITE Surcharge Rate become effective December 1, 2021, or on the first day of the month following Commission approval, should its decision be thereafter.

**D. Statutes controlling schedule for processing the filing**

(Minn. Rules 7829.1300, Subp. 3(D))

Minn. Stat. § 216B.16 permits a utility to implement a proposed rate change after giving the Commission a 60-day notice. This filing is a “miscellaneous tariff filing” as defined by the Commission’s rules at Minn. Rules 7829.0100, Subp. 11. No determination of Otter Tail’s overall revenue requirement is necessary (or required under the Statute). Minn. Rules 7829.1400, Subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter. Minn. Stat. § 216B.1696 Subd. 2(c) provides that a final determination shall be made in a EITE proceeding within 90 days of a miscellaneous rate filing by the electric utility.

**E. Title of utility employee responsible for filing**

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

Darlene Mandelke  
Rates Analyst, Regulatory Administration  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, Minnesota 56538-0496  
(218) 739-8819

**F. Impact on rates**

(Minn. Rules 7829.1300, Subp 4(F))

The EITE Rider has no effect on Otter Tail’s base rates. The additional information required under this Rule is included throughout the Petition.

**G. Service List**

(Minn. Rules 7829.0700)

Otter Tail 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:

Darlene Mandelke  
Rates Analyst  
Regulatory Administration  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, MN 56538-0496  
(218) 739-8819  
dmandelke@otpc.com

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, MN 56538-0496  
(218) 739-8956  
cstephenson@otpc.com

**H. Service on other parties**

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

Pursuant to Minn. Rule 7829.1300, Subp. 2, Otter Tail served a copy of this Petition on the Office of Energy Security of the Department of Commerce and the Antitrust & 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's general service list.

**IV. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

Otter Tail’s EITE Rider was established in Docket No. E017/M-17-257. The Commission approved the EITE discount for three EITE customers<sup>1</sup> in its November 17, 2017 Order in that proceeding. The discount for the three EITE customers commenced on December 1, 2017. The Commission approved Otter Tail’s cost-recovery proposal, including its proposal to refund any increased revenues resulting from the EITE discount to EITE-paying customers in its May 29, 2018 Order. The first EITE Surcharge Rate went into effect June 1, 2018. Otter Tail provides Table 1 with the subsequent filings and Commission approvals.

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<sup>1</sup> Cass Forest Products, Norbord, Inc., and PotlatchDeltic Corporation

**Table 1**

<b>Otter Tail Power Company MN EITE Filing, Order and Implementation Dates</b>					
<b>Description</b>	<b>Docket No.</b>	<b>Date Filed</b>	<b>Order Date</b>	<b>Eligibility/ Discount Implementation Date</b>	<b>Surcharge Rate Implementation Date</b>
<b>Initial Filing</b>					
<b>Eligibility</b>	E017/M-17-257	April 3, 2017	November 17, 2017	December 1, 2017	N/A
<b>Discount</b>	E017/M-17-257	April 3, 2017	November 17, 2017	December 1, 2017	N/A
<b>Cost Recovery</b>	E017/M-17-257	December 18, 2017	May 29, 2018		June 1, 2018
<b>First Update</b>	E017/M-19-199	March 1, 2019	June 13, 2019	N/A	October 1, 2019
<b>Second Update</b>	E017/M-20-338	March 2, 2020	May 22, 2020	N/A	October 1, 2020

**B. EITE Customer Eligibility**

**1. Availability of Statute to Otter Tail**

Minn. Stat. § 216B.1696 is available to an investor-owned electric utility that has at least 50,000 retail electric customers, but no more than 200,000 retail electric customers.<sup>2</sup> Otter Tail has approximately 131,000 total retail electric customers with over 61,000 retail electric customers located in Minnesota.

**2. EITE Statute Applicability to EITE Customers**

Minn. Stat. § 216B.1696, Subd. 1(c) defines an EITE Customer to include:

- (1) an iron mining extraction and processing facility, including a scam mining facility as defined in Minnesota Rules, part 6130.0100, subpart 16;
- (2) a paper mill, wood products manufacturer, sawmill, or oriented strand board manufacturer;
- (3) a steel mill and related facilities; and
- (4) a retail customer of an investor-owned electric utility that has facilities under a single electric service agreement that: (i) collectively imposes a

<sup>2</sup> Minn. Stat. §216B.1696, subd. 2(a)



peak electrical demand of at least 10,000 kilowatts on the electric utility's system, (ii) has a combined annual average load factor in excess of 80 percent, and (iii) is subject to globally competitive pressures and whose electric energy costs are at least ten percent of the customer's overall cost of production.

The EITE Customers that are the subject of this Petition all qualify under Minn. Stat. § 216B.1696, subd. 1(c)(2). The following provides a summary of each EITE Customer's business and why Otter Tail believes each has the ability to request a renewal of the four-year customer eligibility of the EITE Rate under the EITE Statute.

**a. Norbord Profile**

Norbord is an international producer of wood-based panels that is based in Toronto, Canada. Its North American Industry Classification System (NAICS) code is 321219 (Reconstituted Wood Product Manufacturing). Located in the United States, Europe, and Canada, Norbord has fifteen oriented strand board (OSB) mills, one medium density fiberboard (MDF) mill, two particleboard mills, and one furniture plant. One of Norbord's OSB mills is located in Solway, Minnesota, just outside of Bemidji. Norbord's OSB mill in Solway, Minnesota produces approximately 525,000,000 board-feet<sup>3</sup> (on a 3/8-inch basis) of OSB per year. Norbord's OSB mill weather normalized three-year average consumption is **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]**. As an OSB manufacturer, Norbord's Solway, Minnesota mill fits within the EITE Customer definition in Minn. Stat. § 216B.1696, subdivision 1(c)(2).

**b. PotlatchDeltic Profile**

PotlatchDeltic's mill in Bemidji, Minnesota produces approximately 148,000,000 board-feet of cut studs per year. Its NAICS code is 321113 (Sawmills). The PotlatchDeltic mill weather normalized three-year average consumption is **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]**. As a sawmill, PotlatchDeltic's Bemidji,

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<sup>3</sup> A board with 12" by 12" by 1" dimensions is the equivalent of one "board-foot".

Minnesota mill fits within the EITE Customer definition in Minn. Stat. § 216B.1696, subdivision 1(c)(2).

**c. Cass Forest Products Profile**

Cass Forest Products is a wood products manufacturing company with two locations in Cass Lake, Minnesota, and one location just outside Aitkin, Minnesota. Its NAICS codes are 321912 (Cut Stock, Resawing Lumber, and Planing), 321113 (Sawmills) and 321918 (Millwork and Flooring Manufacturing). Otter Tail provides electric service to the two locations in Cass Lake, Minnesota. These mills produce timbers, lumber, 4”x4” squares, finger jointed cut stock parts, heat treat squares and lumber, among other custom products. Cass Forest Products sells its product wholesale. The Cass Lake sawmills produce approximately 8,000,000 board-feet of wood products per year. Cass Forest Products’ sawmill weather normalized three-year average consumption is **[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]**. As a sawmill, Cass Forest Products’ Cass Lake, Minnesota mill fits within the EITE Customer definition in Minn. Stat. § 216B.1696, subdivision 1(c)(2).

**3. EITE Customer Rate**

**a. EITE Rate Design**

The Commission approved the current EITE rate of 20 percent for three EITE customers in its November 17, 2017 Order in Docket No. E017/M-17-257<sup>4</sup>. The EITE Customers claim that a rate reduction of 20 percent continues to be necessary to make each of the rates they pay competitive.

**b. Support for EITE Rate**

All three Otter Tail EITE Customers have represented to Otter Tail that they need the existing EITE rate discount to continue to maintain a reasonable average delivered cost of energy, at an average level of competitiveness when compared to other facilities. Not only does this rate provide an opportunity for the facilities to remain competitive, but it also helps

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<sup>4</sup> *In the matter of Otter Tail Power Company’s Petition for Approval of an Energy-Intensive Trade-Exposed Customer Rate*, Docket No. E017/M/17-257, Order Approving EITE Rate and Establishing Cost-Recovery Proceeding, Order Point 1.

facilitate efficiency and other plant investments to maintain facility viability. Support for each EITE Customer’s request is provided by each of the EITE Customers in the Affidavits that were filed concurrently with this petition. Those affidavits provide customer specific data supporting the EITE rate including the customer contributions to the state, examples of how the electric rates are currently uncompetitive, how the customers are subject to global and other pressures and consequences letting the EITE rate discount expire. In addition, and consistent with Otter Tail’s last petition, trade secret data from the three Otter Tail EITE Customers has been combined and anonymized in the affidavit of Michael Birkeland, Executive Vice President of Minnesota Forest Industries, and the Minnesota Timber Producers Association, as well as analyzed by Mark Rasmussen of Mason, Bruce & Girard, Inc., in his report opining on the myriad benefits the Otter Tail EITE Customers provide to Minnesota.

Otter Tail provides information separately on each EITE Customer, including the impact of the requested EITE Rate on non-EITE Customers for each EITE Customer if the Commission believes that the customer has provided sufficient evidence to support the 20 percent rate reduction each have requested. The rate impact on non-EITE Customers at the 20 percent rate reduction EITE Rate will be the annual costs summarized in Table 2.

**Table 2**

**Non-EITE Customer Rate Increase if EITE Rate Approved for All Three EITE Customers**

<b>Class</b>	<b>Average Annual Electricity Cost (\$)</b>	<b>Annual Cost Increase</b>
Residential	\$919	\$3.53
Farms	\$2,567	\$8.74
General Service	\$3,139	\$11.39
Large General Service	\$188,944	\$1,101.47
Irrigation	\$1,830	\$6.78
Lighting	\$2,086	\$4.74
OPA	\$3,106	\$14.89
Controlled Service Water Heating	\$217	\$0.93
Controlled Service Interruptible	\$1,263	\$8.63
Controlled Service Deferred	\$979	\$6.61

PotlatchDeltic Request

PotlatchDeltic has explained its request is rooted in the results of a 2017 study of various lumber mills throughout the United States conducted by the Beck Group (Competitiveness Study). A copy of the Competitiveness Study is attached to the Affidavit of Mr. Wade Semeliss and the EITE Customers' filing in this Docket. PotlatchDeltic's 2016 rate, which is comparable with the rates used in the Rate Study, was approximately [PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS] in 2016, resulting in a ranking tied with mills [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] out of 9 mills. Since the Competitiveness Study was completed, the PotlatchDeltic Mill's rates have benefitted from participating in [PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS]. Additionally, since 2017 PotlatchDeltic has made efficiency investments that have reduced their electric consumption [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] per unit lumber produced.

No more recent studmill benchmark reports have been conducted since 2016. However, using company internal data as a proxy, the PotlatchDeltic Mill's rate in 2019, in the absence of participating in [PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS]. That rate would have made the PotlatchDeltic Mill's rate [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS] out of PotlatchDeltic Corporation's six sawmills nationwide. Mr. Semeliss compares that rate to the level that PotlatchDeltic considers to be competitive within the meaning of the EITE Statute and its need for an EITE Rate notwithstanding its efforts to reduce its cost of electricity on a per-kWh-basis and its participation in Conservation Improvement Programs to reduce its overall cost of electricity.

PotlatchDeltic has affirmatively stated an EITE Rate that provides a 20 percent reduction from the Large General Service rate “would be one of the factors that will keep the PotlatchDeltic Mill viable.”<sup>5</sup> Table 3 summarizes the rate impact to Otter Tail’s customer classes at the 20 percent rate reduction level for Potlatch.

**Table 3**  
**Non-EITE Customer Rate Impact for Potlatch Rate Reduction**

Class	Average Annual Electricity Cost (\$)	Average Annual Usage (kWh)	20% Rate Reduction Annual Cost Increase (\$) [PROTECTED DATA BEGINS...]
Residential	\$919	9,678	
Farms	\$2,567	23,959	
General Service	\$3,139	31,225	
Large General Service	\$188,944	3,019,917	
Irrigation	\$1,830	18,587	
Lighting	\$2,086	13,007	
OPA	\$3,106	40,834	
Controlled Service Water Heating	\$217	2,553	
Controlled Service Interruptible	\$1,263	23,651	
Controlled Service Deferred	\$979	18,136	

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DATA ENDS]

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<sup>5</sup> Affidavit of Mr. Semeliss filed by the EITE Customers concurrently with this Petition.

Norbord Request

Norbord has explained its request for an EITE Rate is based on a comparison of the electricity prices charged on a per-kWh basis at each of its North American operations (which include OSB facilities in Alabama, Georgia, Mississippi, South Carolina, and Texas in the United States and Alberta, British Columbia, Ontario, and Quebec in Canada. With the current EITE credit, in 2020, the Norbord Mill’s electric rates were only approximately **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]** the average electric-energy rate paid by Norbord’s North American facilities. Without the EITE credit, the Norbord Mill’s projected electric rates balloon to approximately **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]** than the average electric-energy rate paid by Norbord’s North American facilities.

Norbord has also explained to remain competitive; they are always making efforts to reduce costs and improve cost position. Norbord has invested **[PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]** to upgrade and modernize the Norbord Mill. Norbord discusses, in the Affidavit of Mr. Cameron Lewis filed by the EITE Customers concurrently with this Petition, other steps the Norbord Mill has taken to reduce its overall cost of production.

Norbord has affirmatively stated an EITE Rate that provides a 20 percent reduction “would be one of the factors that will keep the Norbord Mill viable.”<sup>6</sup> Table 4 summarizes the rate impact to Otter Tail’s customer classes at the 20 percent rate reduction for Norbord.

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<sup>6</sup> Affidavit of Mr. Lewis filed by the EITE Customers concurrently with this filing.

**Table 4**

**Non-EITE Customer Rate Impact for Norbord Rate Reduction**

Class	Average Annual Electricity Cost (\$)	Average Annual Usage (kWh)	20% Rate Reduction Annual Cost Increase (\$) [PROTECTED DATA BEGINS...
Residential	\$919	9,678	
Farms	\$2,567	23,959	
General Service	\$3,139	31,225	
Large General Service	\$188,944	3,019,917	
Irrigation	\$1,830	18,587	
Lighting	\$2,086	13,007	
OPA	\$3,106	40,834	
Controlled Service Water Heating	\$217	2,553	
Controlled Service Interruptible	\$1,263	23,651	
Controlled Service Deferred	\$979	18,136	

...PROTECTED DATA ENDS]

Cass Forest Products Request

Cass Forest Products explains that electric energy costs are a significant component of Cass Forest Products operations, representing [PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS]

of Cass Forest Product’s operating costs. Cass Forest Products has stated that, in an effort to reduce electricity costs, it invested in [PROTECTED DATA BEGINS....

...PROTECTED DATA ENDS].

Cass Forest Products has stated an EITE Rate that provides a 20 percent reduction “would be one of the factors that will keep Cass Forest Products viable.”<sup>7</sup> Table 5 summarizes the rate impact to Otter Tail’s customer classes at the 20 percent rate reduction level for Cass Forrest Products.

<sup>7</sup> Affidavit of Mr. Goetz filed by the EITE Customers concurrently with this Petition.

Table 5

**Non-EITE Customer Rate Impact for Cass Forest Products Rate Reduction**

Class	Average Annual Electricity Cost (\$)	Average Annual Usage (kWh)	20% Rate Reduction Annual Cost Increase (\$) [PROTECTED DATA BEGINS...]
Residential	\$919	9,678	—
Farms	\$2,567	23,959	—
General Service	\$3,139	31,225	—
Large General Service	\$188,944	3,019,917	—
Irrigation	\$1,830	18,587	—
Lighting	\$2,086	13,007	—
OPA	\$3,106	40,834	—
Controlled Service Water Heating	\$217	2,553	—
Controlled Service Interruptible	\$1,263	23,651	—
Controlled Service Deferred	\$979	18,136	—

...PROTECTED DATA ENDS]

Other EITE Eligibility

In Docket No. E017/M-16-533, Otter Tail notified all customers of the EITE Rate after it made its Initial Filing on June 27, 2016. The notice of filing was sent to all Otter Tail customers in the July 2016 billing cycle. No other Otter Tail customers have requested inclusion in this Petition for the Commission to determine eligibility for the EITE Rate. Otter Tail proposes to limit the applicability of the EITE Rate to the three customers detailed in this Petition. Otter Tail proposes that any changes in the customers eligible for the EITE Rate shall be submitted to the Commission for review and approval under a separate future docket.



**c. Net Benefit to Utility or State**

In the November 17, 2017 Order in Docket No. E017/M-17-257 the Commission found that Otter Tail made the necessary showing of a net benefit to the utility. Otter Tail estimated that, if the EITE customers were to shut down and leave the system, it would experience an annual revenue shortfall derived from the expected EITE customer sales net of avoided EITE customer costs. In the short run, this cost would be borne by Otter Tail; in the longer term, it would be distributed among the Company's remaining customers in a rate case. The current estimated shortfall is \$2,535,158 and is provided on Attachment 6, Line 5.

**C. EITE Customer Baseline**

The Commission approved the current EITE baseline for the three EITE customers in its May 29, 2018 Order in Docket No. E017/M-17-257<sup>8</sup>. The current EITE baseline was approved using a representative amount of sales to the EITE customers based on the 2016 test year from Otter Tail's rate case in Docket No. E017/GR-15-1033. Otter Tail recommends a decrease of 1,437 MWh or 2.18 percent to the baseline based on forecasted usage which better reflects a representative amount of sales to the EITE customers. The decrease includes a decrease for **[PROTECTED DATA BEGINS....**

**...PROTECTED DATA ENDS]**

and an increase of **[PROTECTED DATA BEGINS....**

**...PROTECTED DATA ENDS]** and an increase of **[PROTECTED DATA BEGINS....**

**...PROTECTED DATA ENDS]** based on sales reflective of the forecasted 2021 test year used in the current rate case in Docket No. E017/GR-21-719.<sup>9</sup> An updated baseline will allow Otter Tail to recover any costs, including reduced revenues, or refund any savings, including increased revenues, associated with providing service to a customer under an EITE rate schedule as allowed in Minn. Stat. § 216B.1696, subd. 2(b). Attachment 1 provides the

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<sup>8</sup> *In the matter of Otter Tail Power Company's Petition for Approval of an Energy-Intensive Trade-Exposed Customer Rate*, Docket No. E017/M/17-257, Order Authorizing Cost Recovery with Conditions, Order Point 4.

<sup>9</sup> *In the matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E017/GR-20-719.

proposed baseline by EITE customer and the amount and percentage of the proposed increase or decrease as described above.

**D. EITE Tracker**

The EITE Tracker includes the following attachments:

**1. Summary of Revenue Requirements**

Attachment 2 is a summary of the proposed \$1,015,245 revenue requirement calculated for the December 1, 2021 through November 30, 2022 recovery period including the revenue requirement for the proposed recovery period of \$963,497, carrying charge of \$167 and the projected under-recovery of the current period of \$51,580. The EITE Surcharge Rate for this update is \$0.00039 per kWh, an increase of \$0.00006 per kWh from the current rate of \$0.00033 per kWh.

**2. Tracker Balance**

Otter Tail maintains a tracker account worksheet and accounting system to track and account for the revenue requirement and amount billed to eligible customers. When submitting annual filings, the tracker account is updated so that any over/under recovered amount at the end of the previous year is reflected in the EITE Rider adjustment for the upcoming year. This approach helps mitigate under/over recovery. The tracker summary balance is included in Attachment 3.

If the effective date of the updated EITE Surcharge Rate is more than 45 days later than December 1, 2021, Otter Tail respectfully requests the option to recalculate the rates in order to implement rates that recover the total revenue requirements for the recovery period.

**3. Rate Design**

Otter Tail uses the per kWh rate design approved in the previous Order. The rate design is shown in Attachment 4 and is equal to the total revenue requirement divided by projected kWh sales for the recovery period, not including Low Income Home Energy Assistance Program (LIHEAP) nor the EITE customers. The proposed rate of \$0.00039 per kWh is based on the assumption that the surcharge rate will be in effect beginning December 1, 2021.

#### **4. Revenue Requirements, Rate Application, and Impact**

Otter Tail proposes that the EITE Surcharge Rate continue to be applicable to electric service under Otter Tail's retail rate schedules as defined in Rate Schedule 13.09. The charge will continue to be included as part of the Resource Adjustment line on customers' bills.

The total revenue requirement for the proposed recovery period, as shown on Line 5 in Attachment 2, is \$1,015,245

#### **5. 2020 Annual Sales to and Revenue from EITE Customers**

As required by the Commission's Order point 6<sup>10</sup>, Otter Tail provides the 2020 annual sales to and revenue from EITE customers in Attachment 5 (Line No. 1 and Line No. 2, respectively). Column A provides the actual 2020 sales to and revenue from and Column B provides the approved baseline kWh sales to the EITE customers. Line No. 5 provides the difference of 2020 weather normalized kWh sales, as derived in Attachment 7, compared to the approved baseline to arrive at an estimate of the total weather normalized revenue from the EITE customers compared to the approved baseline (Line No. 6).

Applying the 2020 weather normalization factor<sup>11</sup> for the EITE customers. results in slightly lower energy usage as a result of production operations of the plant. The revenue margin (Attachment 5, Line No. 8)<sup>12</sup> is used to compute the approximate total additional weather normalized marginal revenue below the approved baseline (Attachment 5, Line No. 9) of about \$11,197 for 2020. The total projected refund to EITE surcharge rate paying customers including carrying charges is approximately \$116,898. In accordance with Order Point 5, Otter Tail will refund any increased EITE-customer revenues from increased operations to EITE-surcharge rate paying customers after the four-year discount term in November 2021.

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<sup>10</sup> Minnesota Public Utilities Commission Order dated May 29, 2018 In the Matter of Otter Tail Power Company's Petition for Approval of an Energy-Intensive Trade-Exposed Rate.

<sup>11</sup> Otter Tail's weather normalization process utilizes the current year plus the prior 20 years of Otter Tail hourly weather data, monthly revenue, and monthly kWh data. A statistical regression procedure is used to determine weather normalization models for each of 40 different rate groups within the Minnesota jurisdiction. The EITE customers are part of rate groups 31 (changed from 41 in February 2019), 42, and 43.

<sup>12</sup> Attachment 6 provides the Lost Margin calculation. This calculation was provided as Attachment 7 to Otter Tail's Initial Filing in Docket No. E-017/ M-17-257 updated to reflect 2020 data where appropriate.

**E. Customer Notification and Billing**

Attachment 8 is the proposed notice to customers that will be included with customer bills in the month that the new EITE Surcharge Rate is implemented.

**V. ENERGY-INTENSIVE, TRADE-EXPOSED RIDER RATE SCHEDULE**

Otter Tail’s updated rate schedule Section 13.09 is provided in Attachment 9 to this Petition in both redline and clean versions.

**VI. CONCLUSION**

For the reasons set forth in this Petition, Otter Tail requests Commission approval of the renewal of the four-year customer eligibility, an updated baseline and updated revenue requirement included in this filing and to implement the associated updated EITE Surcharge Rate, Section 13.09, effective for usage on and after December 1, 2021.

Dated: February 1, 2021

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ DARLENE C. MANDELKE

Darlene C. Mandelke

Rates Analyst, Regulatory Administration

Otter Tail Power Company

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Fergus Falls, MN 56537

(218) 739-8819

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OTTER TAIL POWER COMPANY  
EITE FILING ATTACHMENTS

Attachment 1	Baseline kWh
Attachment 2	Summary of Revenue Requirements
Attachment 3	EITE Tracker Summary
Attachment 4	Rate Design
Attachment 5	2020 Annual Sales To and Revenue From EITE Customers – Summary
Attachment 6	Calculation of Marginal Revenue Percent
Attachment 7	2020 Annual Sales To and Revenue From EITE Customers – Detail
Attachment 8	Notice to Customers
Attachment 9	Energy-Intensive, Trade-Exposed Rider, Electric Rate Schedule 13.09

Line No.	EITE Customer kWh	Proposed Baseline kWh	Current Baseline kWh	Proposed Baseline Increase(Decrease)	Percent Increase (Decrease)
1	Norbord [PROTECTED DATA BEGINS...				
2	Potlatch				
3	Cass Forest Products				
				...PROTECTED DATA ENDS]	
4	Total Revenue	64,503,000	65,940,000	(1,437,000)	-2.18%

Summary of Revenue Requirements  
2021 Annual Filing

Line No.	Revenue Requirements	
1	Revenue Requirement (Dec 2021 - Nov 2022)	\$963,497
2		
3	Carrying (Credit)/Charge	167
4	True-Up	51,580
5	Net Revenue Requirement	<u>\$1,015,245</u>

Line No.	FRACKER SUMMARY Requirements Compared to Billed:	2021											Collection Period	2021 December Forecast	2021 YE Forecast	2022											Collection Period
		January Forecast	February Forecast	March Forecast	April Forecast	May Forecast	June Forecast	July Forecast	August Forecast	September Forecast	October Forecast	November Forecast				January Forecast	February Forecast	March Forecast	April Forecast	May Forecast	June Forecast	July Forecast	August Forecast	September Forecast	October Forecast	November Forecast	
1	EITE Customer Revenue Requirement	79,165	71,933	81,158	72,353	69,493	81,211	83,756	84,562	85,845	81,018	80,832	1,092,709	83,417	954,741	80,004	72,790	81,998	73,167	70,234	81,938	84,539	85,396	86,591	81,872	81,550	963,497
2	Net Revenue Requirement	79,165	71,933	81,158	72,353	69,493	81,211	83,756	84,562	85,845	81,018	80,832	1,092,709	83,417	954,741	80,004	72,790	81,998	73,167	70,234	81,938	84,539	85,396	86,591	81,872	81,550	963,497
3	Billed (forecast \$ x rate)	82,237	75,268	74,674	66,914	63,511	62,325	64,727	63,544	59,789	62,192	72,099	971,191	92,418	839,698	101,107	92,582	92,262	83,059	78,895	77,297	79,805	78,257	73,748	76,653	89,162	1,015,245
4	Monthly Revenue Difference	(3,073)	(3,335)	6,484	5,438	5,983	18,887	19,029	21,018	26,056	18,827	8,733	121,518	(9,001)	115,046	(21,103)	(19,792)	(10,264)	(9,892)	(8,660)	4,641	4,734	7,138	12,843	5,218	(7,612)	(51,748)
5	Carrying Charge	(437)	(459)	(483)	(445)	(414)	(379)	(263)	(146)	(15)	148	266	323	(3,719)	(2,303)	268	138	15	(49)	(111)	(166)	(138)	(109)	(65)	15	47	167
6	Life-to-Date Revenue Requirement (Cumulative Difference)	(73,350)	(77,143)	(71,142)	(66,149)	(60,580)	(42,072)	(23,306)	(2,434)	23,607	42,581	51,580	42,903		22,068	2,415	(7,835)	(17,775)	(26,547)	(22,072)	(17,476)	(10,447)	2,331	7,564	(0)		
7	Carrying Charge/Credit Calculation	(459)	(483)	(445)	(414)	(379)	(263)	(146)	(15)	148	266	323	268		138	15	(49)	(111)	(166)	(138)	(109)	(65)	15	47	(0)		
8	Cumulative Carrying Charge	27,488	27,006	26,561	26,147	25,768	25,305	25,359	25,344	25,492	25,758	26,080	26,349		26,487	26,502	26,453	26,342	26,176	26,038	25,928	25,863	25,878	25,925	25,925		
9	Carrying cost	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%		0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	0.63%	
10	Forecasted Sales (kWh)	246,749,729	225,838,575	224,056,102	200,773,945	190,560,853	187,002,936	194,210,285	190,661,005	179,395,729	186,603,016	216,330,768	2,889,618,147	238,465,954	2,480,648,896	260,887,497	238,889,825	238,064,825	214,316,906	203,572,739	199,450,645	205,921,377	201,928,181	190,291,789	197,789,518	230,065,125	2,619,644,379

Approved by MN PUC May 22, 2020 E-017/M-19-199

	October 2020 - November 2021
<b>SUMMARY</b>	
Revenue requirements	\$1,106,466
Carrying Charge	(6,663)
True-up	(115,198)
Total requirements	\$984,606
October 2020 - November 2021	kWh 2,954,267,456
Rate per kWh	0.00033

	December 2021 - November 2022
<b>SUMMARY</b>	
Revenue requirements	\$963,497
Carrying charge	167
True-up	\$1,580
Total requirements	\$1,015,245
December 2021 - November 2022	kWh 2,619,644,379
Rate per kWh	0.00039



**Rate Design**

**Minnesota Revenue Requirements** **\$1,015,245**

Line No.	Rate per kWh	
1		
2	Forecasted Retail Sales, all classes (Dec 2021 - Nov 2022)	2,619,644,379
3		
4	12 Month Revenue Requirement	\$1,015,245
5		
6	Rate per kWh	0.00039
7		

Otter Tail Power Company  
 2020 Annual Sales To and Revenue From EITE Customers - Summary

Line No.	EITE	(A) 2020 Total	(B) Approved Baseline	
1	kWh Sales To	65,787,351	65,940,000	Attachment 6, Columns M & N, Line 17
2	Revenue From	\$ 4,693,121		Attachment 6, Columns M, Line 18
3	Average Cost per kWh	0.07134		A2 / A1
4	Weather Normalized kWh Sales To	65,649,450		Attachment 6, Column M, Line 19
5	Over/(Under) Baseline	\$ (290,550)		B1 - A4
6	Total Revenue Over/(Under) Baseline	\$ (20,727)		A3 * A5
7	Fixed Cost	45.98%		
8	Revenue Margin	54.02%		Attachment 5, Column J, Line 6
9	Total Current Year Additional Revenue Margin	\$ (11,196.52)		A6 * A8
10	Prior Years Additional Revenue Margin	\$ 107,851.69		
11	Total Additional Revenue Margin	\$ 96,655.17		
12	Cummulative Carrying Charge/Credit	\$ 20,242.77		
13	Total Projected Due Back to EITE Surcharge Rate Paying Customers	\$ 116,897.93		

2020 Data										
Line No	A	B	C	D	E	F	G	H	I	J
		Cents <sup>1</sup> Effective \$/kWh ( F / E ) [PROTECTED DATA BEGINS		Load Factor	kWh	Revenue	Fixed Costs ( D * Fixed Costs )	Cost of Energy ( E * Cost of Energy )	Avoided Costs ( G + H )	Lost Margin ( F - I )
1	Potlatch Corporation									
2	Norbord									
3	Cass Forest Products Inc									
4	Cass Forest Products									
5	<b>EITE Customer Total</b>									
6	<b>Components</b>								<b>Marginal Revenue Percent</b>	<b>54.02%</b> [J4/F4]
7	Cost of Energy <sup>2</sup>	2.4652	cents/kWh							
8	Fixed Costs <sup>3</sup> [PROTECTED DATA BEGINS	\$	per kW							PROTECTED DATA ENDS]

<sup>1</sup> Based on Total Bill divided by kWh

<sup>2</sup> Base Cost of Energy rate from Otter Tail's Base Cost of Energy approved in the last rate case, Docket No. E017/MR-15-1033

<sup>3</sup> Represents the average fixed costs per kW for the three customers eligible for the EITE discount

Otter Tail Power Company 2020 Annual Sales To and Revenue From EITE Customers - Detail																
Line No.		(A) 2020 January	(B) 2020 February	(C) 2020 March	(D) 2020 April	(E) 2020 May	(F) 2020 June	(G) 2020 July	(H) 2020 August	(I) 2020 September	(J) 2020 October	(K) 2020 November	(L) 2020 December	(M) 2020 Total	(N) Approved Baseline	(O) 2020 Baseline Variance
1	Norbord	[PROTECTED DATA BEGINS...]														
2	kWh Sales															
3	Revenue															
4	Percent above/(below) normal degree days															
4	Weather normalized kWh - rate group 42															
5	Potlatch															
6	kWh Sales															
7	Revenue															
8	Percent above/(below) normal degree days															
8	Weather normalized kWh - rate group 43															
9	Cass Forest Products															
10	kWh Sales															
11	Revenue															
12	Percent above/(below) normal degree days															
12	Weather normalized kWh - rate group 41															
13	Cass Forest Products Inc.															
14	kWh Sales															
15	Revenue															
16	Percent above/(below) normal degree days															
16	Weather normalized kWh - rate group 43															
																...PROTECTED DATA ENDS!
17	kWh Sales To	6,556,270	5,706,321	4,878,080	5,888,701	5,218,746	4,924,289	5,875,771	5,415,820	5,302,063	5,598,437	5,241,130	5,181,723	65,787,351	65,940,000	(152,649)
18	Revenue From	432,842	432,118	373,781	428,249	386,167	366,340	416,739	378,861	371,116	379,471	369,407	358,029	4,693,121	4,641,500	51,621
19	Total weather normalized kWh	6,597,753	5,711,429	4,899,114	5,858,170	5,244,392	4,738,285	5,770,839	5,394,033	5,370,334	5,532,970	5,276,792	5,255,339	65,649,450	65,940,000	(290,550)

On, Month XX, XXXX the Minnesota Public Utilities Commission approved our request to decrease our Energy-Intensive Trade-Exposed (EITE) Surcharge Rate. The approved rate of \$0.00039 per kWh will become effective December 1, 2021, for all classes of customers subject to the charge.

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

For more information, contact Customer Service at 800-257-4044 or visit [otpc.com](http://otpc.com)

**Attachment 9**

**EITE Rider, Tariff 13.09  
Redline and Clean**



Fergus Falls, Minnesota

**ENERGY-INTENSIVE, TRADE-EXPOSED (EITE) RIDER**

DESCRIPTION	RATE CODE
EITE Surcharge	MEITE
EITE Exemption Adjustment	MEITA

**RULES AND REGULATIONS:** Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

**APPLICATION OF RIDER:** This rider is applicable to any electric service under all of the Company's retail rate schedules pursuant to Minn. Stat. 216B.1696 Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer, except for those Customers with Low-Income Home Energy Assistance Program (LIHEAP) designation in the Company's billing system at the time of billing, as defined in Minn. Stat. 216B.16, Subd. 15, and the EITE Customers pursuant to Minn. Stat. 216B.1696, Subd.2(d). The exemptions are as follows:

EITE and LIHEAP Customers will be exempted from the Company's EITE charges (EITE Surcharge) pursuant to Minn. Stat. 216B.1696, Subd. 2(d) Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer. LIHEAP Customer designations will be reset each September 1. Residential Customers must annually reapply for such designation and be granted assistance from a LIHEAP to continue to be exempt from the EITE Surcharge.

**EITE SURCHARGE AND EXEMPTION ADJUSTMENT:** There shall be added to each non-exempt Customer's bill an EITE Surcharge, which shall be the EITE Surcharge Rate multiplied by the Customer's billing kWh for electric service. The EITE Surcharge will be included in the Resource Adjustment line item on the Customer's bill.

The EITE Surcharge shall not be applied to Customer Account(s) granted exemption by the Commission from EITE costs pursuant to Minn. Stat. 216B.1696, Subd. 2(d).

The EITE Surcharge Rate is \$0.~~00033~~00039 per kWh.

**R**

**DETERMINATION OF EITE SURCHARGE RATE:** The EITE Surcharge Rate shall be the forecasted Recoverable EITE Tracker Balance divided by projected Minnesota non-exempt retail kWh sales for a designated 12-month recovery period. The EITE Surcharge Rate shall be rounded to the nearest \$0.00001. The EITE Surcharge Rate may be adjusted annually by approval of the Minnesota Public Utilities Commission (Commission). The Recoverable EITE Tracker Balance is determined as described below, starting with the Commission-accepted EITE Tracker account balance as of the end of the prior year.



Fergus Falls, Minnesota

**ENERGY-INTENSIVE, TRADE-EXPOSED (EITE) RIDER**

DESCRIPTION	RATE CODE
EITE Surcharge	MEITE
EITE Exemption Adjustment	MEITA

**RULES AND REGULATIONS:** Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

**APPLICATION OF RIDER:** This rider is applicable to any electric service under all of the Company's retail rate schedules pursuant to Minn. Stat. 216B.1696 Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer, except for those Customers with Low-Income Home Energy Assistance Program (LIHEAP) designation in the Company's billing system at the time of billing, as defined in Minn. Stat. 216B.16, Subd. 15, and the EITE Customers pursuant to Minn. Stat. 216B.1696, Subd.2(d). The exemptions are as follows:

EITE and LIHEAP Customers will be exempted from the Company's EITE charges (EITE Surcharge) pursuant to Minn. Stat. 216B.1696, Subd. 2(d) Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer. LIHEAP Customer designations will be reset each September 1. Residential Customers must annually reapply for such designation and be granted assistance from a LIHEAP to continue to be exempt from the EITE Surcharge.

**EITE SURCHARGE AND EXEMPTION ADJUSTMENT:** There shall be added to each non-exempt Customer's bill an EITE Surcharge, which shall be the EITE Surcharge Rate multiplied by the Customer's billing kWh for electric service. The EITE Surcharge will be included in the Resource Adjustment line item on the Customer's bill.

The EITE Surcharge shall not be applied to Customer Account(s) granted exemption by the Commission from EITE costs pursuant to Minn. Stat. 216B.1696, Subd. 2(d).

The EITE Surcharge Rate is \$0.00039 per kWh.

**R**

**DETERMINATION OF EITE SURCHARGE RATE:** The EITE Surcharge Rate shall be the forecasted Recoverable EITE Tracker Balance divided by projected Minnesota non-exempt retail kWh sales for a designated 12-month recovery period. The EITE Surcharge Rate shall be rounded to the nearest \$0.00001. The EITE Surcharge Rate may be adjusted annually by approval of the Minnesota Public Utilities Commission (Commission). The Recoverable EITE Tracker Balance is determined as described below, starting with the Commission-accepted EITE Tracker account balance as of the end of the prior year.



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
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	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496  Fergus Falls, MN 56538-0496	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
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	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_OTP 2021 EITE Service List