215 South Cascade Street PO Box 496 Fergus Falls, Minnesota 56538-0496 218 739-8200 www.otpco.com (web site)

September 8, 2025



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

RE: In the Matter of the Petition of Otter Tail Power Company for Approval of a Transfer of Property Docket No. E017/PA-25-218 Reply Comments

Dear Mr. Bull:

Otter Tail Power Company (Otter Tail Power or the Company) appreciates the Minnesota Department of Commerce, Division of Energy Resources (Department), for its thorough review of this matter. The Company supports the conclusions and the recommendation for approval of its Transfer of Property, a 1.5-mile portion of the Lake Ardoch to Oslo – 115 kV transmission line, as outlined in the Department's Comments dated August 27, 2025.

The Company has 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 218-739-8774 or <u>ldonofrio@otpco.com</u> if you have any questions regarding this filing.

Sincerely,

/s/ LAUREN DONOFRIO Lauren Donofrio Senior Associate General Counsel

vjm Enclosures By electronic filing c: Service List



## **CERTIFICATE OF SERVICE**

RE: In the Matter of the Petition of Otter Tail Power Company for Approval of a Transfer of Property Docket No. E017/PA-25-218

I, Valerie Moxness, hereby certify that I have this day served a copy of the following, or a summary thereof, on Mike Bull 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 Reply Comments

Dated this 8th day of September, 2025.

/s/ VALERIE MOXNESS

Valerie Moxness Regulatory Filing Coordinator Otter Tail Power Company 215 South Cascade Street Fergus Falls MN 56537 (218) 739-8346

| #  | First<br>Name | Last Name             | Email                             | Organization                           | Agency   | Address   | Delivery<br>Method    | Alternate<br>Delivery<br>Method | View<br>Trade<br>Secret | Service<br>List<br>Name |
|----|---------------|-----------------------|-----------------------------------|--|--|---|-----------------------|---------------------------------|-------------------------|-------------------------|
| 1  | Mike          | Bull                  | mike.bull@state.mn.us             |  | Public<br>Utilities<br>Commission                                      | 121 7th Place<br>East, Suite<br>350<br>St. Paul MN,<br>55101<br>United States         | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 2  | Ray           | Choquette             | rchoquette@agp.com                | Ag<br>Processing<br>Inc.               |  | 12700 West<br>Dodge Road<br>PO Box 2047<br>Omaha NE,<br>68103-2047<br>United States   | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 3  | Generic       | Commerce<br>Attorneys | commerce.attorneys@ag.state.mn.us |  | Office of the<br>Attorney<br>General -<br>Department<br>of<br>Commerce | 445 Minnesota<br>Street Suite<br>1400<br>St. Paul MN,<br>55101<br>United States       | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 4  | Lauren        | Donofrio              | Idonofrio@otpco.com               | Otter Tail<br>Power<br>Company         |  | 215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56538-<br>0496<br>United States | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 5  | Sharon        | Ferguson              | sharon.ferguson@state.mn.us       |  | Department<br>of<br>Commerce   | 85 7th Place E<br>Ste 280<br>Saint Paul<br>MN, 55101-<br>2198<br>United States        | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 6  | Jessica       | Fyhrie                | jfyhrie@otpco.com                 | Otter Tail<br>Power<br>Company         |  | PO Box 496<br>Fergus Falls<br>MN, 56538-<br>0496<br>United States                     | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 7  | Amber         | Grenier               | agrenier@otpco.com                | Otter Tail<br>Power<br>Company         |  | 215 S.<br>Cascade St.<br>Fergus Falls<br>MN, 56537<br>United States                   | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 8  | Adam          | Heinen                | aheinen@dakotaelectric.com        | Dakota<br>Electric<br>Association      |  | 4300 220th St<br>W<br>Farmington<br>MN, 55024<br>United States                        | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 9  | Nick          | Kaneski               | nick.kaneski@enbridge.com         | Enbridge<br>Energy<br>Company,<br>Inc. |  | 11 East<br>Superior St<br>Ste 125<br>Duluth MN,<br>55802<br>United States             | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 10 | James<br>D.   | Larson                | james.larson@avantenergy.com      | Avant Energy<br>Services               |  | 220 S 6th St<br>Ste 1300<br>Minneapolis<br>MN, 55402<br>United States                 | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 11 | Kavita        | Maini                 | kmaini@wi.rr.com                  | KM Energy<br>Consulting,<br>LLC        |  | 961 N Lost<br>Woods Rd<br>Oconomowoc<br>WI, 53066<br>United States                    | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 12 | Andrew        | Moratzka              | andrew.moratzka@stoel.com         | Stoel Rives<br>LLP                     |  | 33 South Sixth<br>St Ste 4200<br>Minneapolis<br>MN, 55402<br>United States            | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 13 | Matthew       | Olsen                 | molsen@otpco.com                  | Otter Tail<br>Power<br>Company         |  | 215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56537<br>United States          | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |

| #  | First<br>Name     | Last Name                            | Email                                    | Organization                   | Agency   | Address   | Delivery<br>Method    | Alternate<br>Delivery<br>Method | View<br>Trade<br>Secret | Service<br>List<br>Name |
|----|-------------------|--------------------------------------|--|--------------------------------|--|---|-----------------------|---------------------------------|-------------------------|-------------------------|
| 14 | Generic<br>Notice | Regulatory                           | regulatory_filing_coordinators@otpco.com | Otter Tail<br>Power<br>Company |  | 215 S.<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56537<br>United States               | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 15 | Generic<br>Notice | Residential<br>Utilities<br>Division | residential.utilities@ag.state.mn.us     |                                | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | 1400 BRM<br>Tower<br>445 Minnesota<br>St<br>St. Paul MN,<br>55101-2131<br>United States | Electronic<br>Service |                                 | Yes                     | PA-25-<br>218           |
| 16 | Cary              | Stephenson                           | cstephenson@otpco.com                    | Otter Tail<br>Power<br>Company |  | 215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56537<br>United States            | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |
| 17 | Stuart            | Tommerdahl                           | stommerdahl@otpco.com                    | Otter Tail<br>Power<br>Company |  | 215 S<br>Cascade St<br>PO Box 496<br>Fergus Falls<br>MN, 56537<br>United States         | Electronic<br>Service |                                 | No                      | PA-25-<br>218           |