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April 30, 2025



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 the Petition of Otter Tail Power Company for Approval of a
Transfer of Property
Docket No. E017/PA-25-
Initial Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Petition for Approval of a Transfer of Property, a 1.5-mile portion of the Lake Ardoch to Oslo – 115 kV transmission line, in the above-referenced matter.

Otter Tail Power has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA in the petition, and in Confidential Exhibit A and Confidential Exhibit B, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the "Protected Data"). The Protected Data is therefore "trade secret information" and "nonpublic data" under Minn. Stat. § 13.37.

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 218-739-8774 or ldonofrio@otpc.com 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

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

**In the Matter of the Petition of
Otter Tail Power Company for
Approval of a Transfer of Property**

**Docket No. E017/PA-25-
SUMMARY OF FILING**

Pursuant to Minnesota Statutes § 216B.16 subd. 7c and § 216B.50, and Minnesota Rules 7825.1400, 7825.1700 and 7825.1800, Otter Tail Power Company (Otter Tail Power) hereby petitions the Commission for approval to sell an approximately 1.5-mile section of its Lake Ardoch to Oslo - 115 kV Transmission Line to Minnkota Power Cooperative Inc. (“Minnkota Power”). Otter Tail submits that the proposed sale is consistent with the public interest, pursuant to subd. 7c(a) of Minnesota Statutes § 216B.16 and subd. 1 of Minnesota Statutes § 216B.50, for the reasons set forth in this petition. Otter Tail requests that the Commission give its consent and approval by order in writing, upon investigation without public hearing.

State Of Minnesota
Before the Minnesota Public Utilities Commission

In the Matter of the Petition of Otter Tail Power Company for
Approval of a Transfer of Property

Docket No. E017/PA-25-

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April 30, 2025

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

**In the Matter of the Petition of
Otter Tail Power Company for
Approval of a Transfer of Property**

**Docket No. E017/PA-25-
PETITION**

I. INTRODUCTION

Pursuant to Minnesota Statutes § 216B.16 subd. 7c and § 216B.50, and Minnesota Rules 7825.1400, 7825.1700 and 7825.1800, Otter Tail Power Company (Otter Tail Power) hereby petitions the Commission for approval to sell an approximately 1.5 mile section of its Lake Ardoch to Oslo – 115 kV Transmission Line to Minnkota Power Cooperative Inc. (“Minnkota Power”). Otter Tail submits that the proposed sale is consistent with the public interest, pursuant to subd. 7c(a) of Minnesota Statutes § 216B.16 and subd. 1 of Minnesota Statutes § 216B.50, for the reasons set forth in this petition. Otter Tail requests that the Commission give its consent and approval by order in writing, upon investigation without public hearing.

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

A. Filing Requirements

Minnesota Rules 7825.1800 requires that a petition for approval of a transfer of property be accompanied by all information required in Minnesota Rules 7825.1400, items A to J, which primarily relates to capital structure approval and sale of securities. Otter Tail believes that it has provided all relevant information called for by Minnesota Rules 7825.1400, items A to J. Furthermore, as there are no securities associated with the proposed transfer of property, as such, Minnesota Rules 7825.1400 items F through J are inapplicable.

1. Name, address, and telephone number of petitioner and address of its principal business office (Minn. Rules 7825.1400, item C).

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

2. Name, address, and telephone number of the person authorized to receive notices and communications with respect to the petition (Minn. Rules 7825.1400, item D and 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:

Jessica Fyhrie
Manager, Regulatory Proceedings
Regulatory Administration
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8395
jfyhrie@otpc.com

Lauren Donofrio
Senior Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
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(218) 739-8774
ldonofrio@otpc.com

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpc.com

3. Verified Statement (Minn. Rule 7825.1400, item E)

A verified statement by a responsible officer of the petitioner attesting to the accuracy and completeness of the enclosed information is included at the end of this Petition.

4. Title of utility employee responsible for filing (Minn. Rules 7829.1300, subp. 3(E))

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

5. 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 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.

6. Affiliated Interest Statement (Minn. Rules 7825.1400 item H)

At the time of filing of the petition, Otter Tail Power does not know of any person who is an "affiliated interest" within the meaning of Minnesota Statutes § 216B.48, subd. 1.

IV. DESCRIPTION OF THE TRANSACTION

A. Background

Otter Tail Power and Minnkota Power (collectively the Companies) operate and discretely own a 115 kV transmission system, along with lower voltage transmission and distribution facilities, which serve both Otter Tail Power customers and Minnkota Power customers. This 115 kV system serves customers from Karlstad, MN, down to Thief River Falls, MN, and Winger MN, over to Grand Forks, ND and up to Drayton, ND, covering a large portion of northwest Minnesota and the eastern side of North Dakota. Over the past 15 years, loads have grown within this area causing the need for upgrades to reinforce the transmission system to maintain reliability.

B. Reliability Upgrade Portfolio

Otter Tail Power, Minnkota Power, and the Midcontinent Independent System Operator, Inc. (MISO) identified an optimized portfolio of upgrades that

would provide necessary reinforcements to the area and allow both utilities to continue to provide reliable service to our customers. These upgrades included the following:

1. Expansion of the Otter Tail Power Winger 115 kV bus;
2. Addition of a new 2nd 230/115 kV transformer in the Winger substation;
3. Expansion of the Minnkota Power Winger 230 kV bus;
4. A new Lake Ardoch 230/115 kV substation on the Prairie – Drayton 230 kV line;
5. A new Oslo 115 kV breaker station;
6. A new approximately 6-mile 115 kV line from the new Lake Ardoch 230/115 kV substation to the new Oslo 115 kV breaker station;
7. Addition of optical ground wire (OPGW) on the Prairie – Lake Ardoch 230 kV line;
8. Replacement of Plummer 115 kV switches 1331 and 1332;
9. Replacement of Oslo Town 115 kV switches 1241 and 1242.

Because both Companies' customers would benefit from the proposed upgrades, the Companies determined that each company would invest in these upgrades in proportion to its respective load within the benefiting area. Otter Tail Power's load consists of approximately 50% of the benefitting load and Minnkota Power's load consists of approximately 50% of the benefitting load. Therefore, Otter Tail Power and Minnkota Power agreed to invest in these upgrades at a share of 50% Otter Tail Power and 50% Minnkota Power. MISO approved the portfolio of projects for reliability in MTEP19, project ID #4232.¹

C. Companies' Memorandum of Understanding

One of the goals of the Companies while negotiating a Memorandum of Understanding about the reliability upgrade portfolio was for each of the companies to continue to own its existing facilities and not to introduce new ownership within those facilities (i.e., co-ownership). Therefore, each company agreed to take on the expansion of any existing facilities that each owned. Minnkota Power would own the new Lake Ardoch substation and Otter Tail Power would own the new Oslo breaker station. To achieve the desired investment balance of 50% Otter Tail Power and 50% Minnkota Power in the reliability

¹ Project 4232 was subsequently updated to add the Lake Ardoch to Oslo line, and addition was approved by MISO in MTEP23.

upgrade portfolio, the Companies decided to use the ownership of the new 115 kV line from the new Lake Ardoch 230/115 kV substation to the new Oslo 115 kV breaker station to balance out the investment by each of the companies. After the completion of all the upgrades, the Companies would compare the costs of the upgrades made by each company, and they would determine each company's ownership of the new 115 kV line based on the amount necessary to bring each company's investment in the total combined projects to 50 percent.

Otter Tail Power and Minnkota Power documented their arrangement in a Memorandum of Understanding executed on July 19, 2023, which is attached as Confidential Exhibit A.

D. Companies' Facilities Construction Agreement

At the time of contracting and based on estimates of the costs of the various upgrades, the Companies projected that Otter Tail Power would be the majority owner of the Lake Ardoch – Oslo 115 kV line and Minnkota Power the minority owner. Due to this projected ownership balance, and for efficiency purposes, Otter Tail Power agreed to construct the full Lake Ardoch – Oslo 115 kV line. Otter Tail Power and Minnkota Power entered into a Facility Construction Agreement (FCA) on August 5, 2024, is attached as Confidential Exhibit B. This agreement outlined the responsibility of Otter Tail Power to construct the Lake Ardoch – Oslo 115 kV line. Further, it documented that Otter Tail Power would invoice Minnkota Power, and Minnkota Power would pay Otter Tail Power, 28% of the actual costs for the Lake Ardoch – Oslo 115 kV line. At the time of executing the FCA, the Companies expected that Otter Tail Power would own 72% of the line and that Minnkota Power would own 28% of the line, based on actual costs and estimated costs of the upgrades for the northwest Minnesota area. Billing during construction of the line ensured that Minnkota Power would not need to provide a large sum of dollars at the completion of the Lake Ardoch – Oslo 115 kV line. Further, the FCA documented how and when the Lake Ardoch – Oslo 115 kV line would be trued up between the Companies, prior to energization.

Prior to energization, the Companies compared the actual costs and the expected costs of the upgrades to determine what percentage of the Lake Ardoch – Oslo 115 kV line each of the companies would own. The actual costs (and remaining expected costs²) of the upgrades are shown in Table 1 below.

² There remain outstanding a very small number of subcontractors' final bills, which Otter Tail Power and Minnkota Power agree will not shift the percentage ownership in the Lake Ardoch – Oslo 115 kV line.

Table 1: Actual and Estimated Investment in Northwest Minnesota Upgrades

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Table 2 below breaks out the Lake-Ardoch – Oslo 115 kV Line costs by utility:

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Based on the upgrade costs within Table 1 and broken out in Table 2, and the terms of the parties' Memorandum of Understanding and FCA, the Companies determined that Otter Tail Power would discretely own 75% of the Lake Ardoch – Oslo 115 kV line from the Oslo 115 kV end and Minnkota Power would discretely own 25% of the Lake Ardoch – Oslo 115 kV line, approximately 1.5 miles from the Lake Ardoch end. Otter Tail Power reimbursed Minnkota Power for the extra 3% (projected 28 percent - actual 25 percent) Minnkota Power had paid during the construction period for the Lake Ardoch to Oslo – 115 kV line. The new Lake Ardoch – Oslo 115 kV line went into service in February of 2025.

V. COMMISSION APPROVAL

Otter Tail Power seeks Commission approval of its proposed transfer of 25% of its newly constructed Lake Ardoch to Oslo – 115 kV Transmission Line. Minnesota Statutes § 216B.16, subd. 7c(a) governs utility transfers of transmission assets. The statute provides in part that the Commission must review transfers of transmission facilities either in a general rate case or by “other proceedings it determines provide adequate review of the transmission asset transfer” to determine if the transfer is in the “public interest.” Section 216B.16, subd. 7c(b) also provides that transfer of ownership of transmission facilities is also subject to section § 216B.50. Minnesota Statutes § 216B.50 authorizes the Commission to investigate an application for approval and consent without public hearing.

A. Statutory Requirements and Standard of Review

In determining whether to approve a utility’s transfer of transmission facilities to another transmission owner governed by the FERC, the Commission may only find the transfer is consistent with the public interest after it has evaluated five specific factors. Minnesota Statutes § 216B.16, subd. 7c(a) provides in part:

In assessing the public interest, the commission shall evaluate, among other things, whether the transfer:

- (1) facilitates the development of transmission infrastructure necessary to ensure reliability, encourages the development of renewable resources, and accommodates energy transfers within and between states;
- (2) protects Minnesota ratepayers against the subsidization of wholesale transactions through retail rates;
- (3) ensures, in the case of operational control of transmission assets, that the state retains jurisdiction over the transferring utility for all aspects of service under this chapter;
- (4) impacts Minnesota retail rates; and
- (5) protects Minnesota ratepayers from paying capital costs for transmission assets that have already been recovered.

This is a balancing test, where the Commission must weigh each factor to determine whether, overall, the transfer is consistent with the public interest. Similarly, § 216B.50 provides that “[i]f the commission finds that the proposed action is consistent with the public interest, it shall give its consent and approval by order in writing.”

Minnesota Rules 7825.1700 provides, in part: “A public utility, prior to entering into a transaction, shall petition for and receive from the commission by

formal written order approval for such transaction.” In the context of mergers, the Commission in 1997 established “consistent with the public interest” under Minn. Stat. 216B.50 does not require an affirmative finding of public benefit, just a finding the transaction is compatible with the public interest. *In the Matter of the Proposed Merger of Minnegasco, Inc., Docket G-008/PA-96-950*. There is no reason that the phrase “consistent with the public interest” should be interpreted any differently in the context of § 216B.16, subd. 7c.

In 1986 the Commission established that it has jurisdiction when property subject to a proposed transaction is a part of the integrated operating system serving Minnesota ratepayers. *In the Matter of the Application of Interstate Power Company for Authority to Increase its Rates for Electric Service in Minnesota, Docket E-001/GR-86-384*. The Oslo to Lake Ardoch 115 kV Transmission Line is a part of Otter Tail Power’s operating unit or system serving customers in three states, including Minnesota.

B. Application of the Public Interest Balancing Test

Commission approval depends on demonstrating that the transaction is consistent with public interest. For both Otter Tail Power and Minnkota Power customers, the transaction is in the public interest because it represents the culmination of two utilities’ intentional cooperation to efficiently ensure reliable transmission service without duplication of effort or facilities. As a matter of policy, the Commission should encourage utilities with overlapping transmission service areas to cooperate, to combine efforts to ensure reliable transmission in an efficient manner. Given the many improvements that were part of this group of reliability projects, coordination and cooperation between affected utilities is essential to efficient and cost-effective improvements, with a minimum of outages. Without coordination, utilities may make improvements individually that end up being duplicative or require more outages during construction. Denying the petition would have a chilling effect on future collaborative projects between utilities.

In this case, Minnkota has already paid for its 25% share of the reliability projects, pursuant to the terms of the Companies’ FCA. If the Commission denies the Petition, Otter Tail Power would have to reimburse Minnkota for its approximate **[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]** investment in the Lake Ardoch to Oslo 115 kV transmission line.

In addition, the transfer of approximately 1.5 miles of transmission line is consistent with the public interest when considering each of the five statutory factors:

1. The transfer facilitates the development of transmission infrastructure necessary to ensure reliability, encourages the development of renewable resources, and accommodates energy transfers within and between states.

The upgrades to the transmission system completed in the northwest Minnesota area and eastern North Dakota area³ were necessary to continue to provide reliable service to both Otter Tail Power and Minnkota Power customers due to load growth in the area. The upgrades in northwest Minnesota resolved numerous voltage concerns and thermal concerns that existed within the area. These were MISO-approved reliability projects. The transfer of the facilities requested allows each company to develop infrastructure and necessary transmission system upgrades that will provide benefits to both utilities in this area through investments in proportion to each company's respective proportion of customers and load that benefit within the area. Keeping costs and benefits balanced between the companies and their respective customers is consistent with the public interest.

2. The transfer protects Minnesota ratepayers against the subsidization of wholesale transactions through retail rates;

This transfer is not of a percentage interest in the transmission line, but rather is the transfer of a section of the line from "pole-to-pole." A pole-to-pole transfer contemplates the transfer of all transmission assets from one location on the line to another. This means that there can be no duplication of costs between the utility owners because each will include 100% of the cost associated with its portion of the line in its rates. There is no subsidization of wholesale transactions through retail rates here, as Otter Tail Power's transfer of the portion of the line is transferring a greenfield asset for actual costs incurred to develop and build the line. Therefore, there is no disparity between the cost Otter Tail Power incurred to build the portion of the line, and how much Otter Tail Power is receiving for

³ The Lake Ardoch to Oslo 115 kV line is in North Dakota and supports the Northwest Minnesota load pocket.

transferring the portion of the line. The benefit of the transfer goes entirely to customers as it offsets rate base on a dollar-to-dollar basis. The transfer does not result in subsidization of wholesale transaction costs and so is consistent with the public interest.

3. The transfer ensures, in the case of operational control of transmission assets, that the state retains jurisdiction over the transferring utility for all aspects of service under this chapter.

Transfer of operational control of transmission assets retained by Otter Tail Power is not an issue in this matter. Moreover, the transfer does not deprive the Commission of jurisdiction over Otter Tail Power for all aspects of the service that the Company provides under chapter 216B. As such, the transfer is consistent with the public interest.

4. The transfer has no negative impact on Minnesota retail rates.

The transfer is not based upon a negotiated price. The transfer is based upon the actual cost to build the portion of the line being transferred. Therefore, there is no gap between the cost Otter Tail Power incurred to build the portion of the line, and how much Otter Tail Power has received from Minnkota for the portion of the line. The benefit of the transfer goes entirely to Otter Tail Power customers as it offsets rate base on a dollar-to-dollar basis. Moreover, Otter Tail Power and Minnkota Power provide reciprocal service to one another under their Interconnection and Transmission Services Agreement, so there will be no “pancake” effect on transmission rates.⁴ If the Commission denies the Petition, Otter Tail Power would have to reimburse Minnkota for the amount it has invested in the line, which would increase rate base, and ultimately increase Otter Tail Power rates.

5. The transfer protects Minnesota ratepayers from paying capital costs for transmission assets that have already been recovered.

The transfer protects Minnesota ratepayers from paying capital costs for transmission assets that have already been recovered because Minnkota

⁴ Service Agreement No. 30, Amended Interconnection and Transmission Services Agreement, accepted by the FERC in Docket No. ER06-439-001.

has already paid for its share of the construction costs to build the Lake Ardoch to Oslo – 115 kV transmission line. If the Commission denies the Petition, Otter Tail Power would have to reimburse Minnkota for the amount it has invested in the line and Otter Tail Power customers would have to pay for that portion of the line, which as of today, has already been paid for by Minnkota.

Each of the statutory factors under the § 216B.16 subd. 7c(a) balancing test supports a conclusion that approving the transfer is consistent with the public interest.

VI. REQUEST FOR ORDER

Otter Tail respectfully requests the Commission approve the proposed transaction as consistent with the public interest for the reasons set forth in this petition. Otter Tail further requests that the Commission give its consent and approval by order in writing, upon investigation without public hearing.

Dated: April 30, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ LAUREN DONOFRIO
Lauren Donofrio
Senior Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537

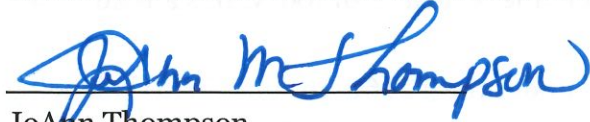
VERIFICATION

STATE OF MINNESOTA)

) ss.

COUNTY OF OTTER TAIL)

JoAnn Thompson, being duly sworn on oath, says that she is the Vice President Asset Management of Otter Tail Power Company, a wholly owned subsidiary of Otter Tail Corporation, the company making the foregoing Petition for Approval of a Transfer of Property, that she has read the foregoing Petition and knows the content thereof, and that the same is true and correct to the best of her knowledge, information and belief.



JoAnn Thompson

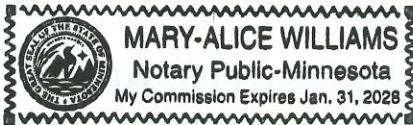
Vice President Asset Management

Otter Tail Power Company

Subscribed and sworn to before me this 30th day of April, 2025.



Notary Public



[PROTECTED DATA BEGINS...

Docket No. E017/PA-25-
Exhibit A
is CONFIDENTIAL
in its Entirety

...PROTECTED DATA ENDS]

[PROTECTED DATA BEGINS...

Docket No. E017/PA-25-
Exhibit B
is CONFIDENTIAL
in its Entirety

...PROTECTED DATA ENDS]

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-**

I, Valerie Moxness, 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**

Dated this **30th** day of **April, 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 Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
2	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		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
3	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	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
4	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
5	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
7	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
8	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
9	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
										115kV Transfer of Ownership 216B.50
10	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
11	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
12	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	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
13	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		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
14	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
15	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50
16	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	Otter Tail Power Company Ardoch - Oslo 115kV Transfer of Ownership 216B.50