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December 31, 2014



Dr. Burl Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Otter Tail Power Company's 2012-2013 Annual Automatic
Adjustment of Charges Report - Electric
Docket No. E999/AA-13-599
Otter Tail Power Company Additional Initial Comments**

Dear Dr. Haar:

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

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

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

Sincerely,

/s/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration

wao
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 2012-2013 Annual
Automatic Adjustment of Charges
Report - Electric

Docket No. E999/AA-13-599

**OTTER TAIL POWER COMPANY
ADDITIONAL INITIAL COMMENTS**

I. INTRODUCTION

On November 19, 2014, the Minnesota Public Utilities Commission ("Commission") filed a Notice of Additional Comment Period in the above captioned Docket. Otter Tail Power Company ("Otter Tail") submits these Additional Initial Comments to address the following questions raised by the Commission in its November 19 Notice:

Topic/s Open for Comment:

- Should the Commission accept the electric utilities 2012-2013 annual automatic adjustment reports?
- Should the Commission adopt the recommendations in the Department's September 16, 2014 review of the 2012-2013 annual automatic adjustment reports?
- Should the Commission adopt the recommendations in the OAG-AUD's September 26, 2014 comments?
- Any other issues parties consider appropriate.

II. RESPONSES TO TOPICS OPEN FOR COMMENT

Should the Commission accept the electric utilities 2012-2013 annual automatic adjustment reports?

Yes. Otter Tail has complied with all of its reporting requirements for the 2012-2013 annual automatic adjustment report (“AAA”) through its Initial Filing in this Docket and Reply Comments submitted November 10, 2014. Otter Tail requests approval of its 2012-2013 AAA report.

Should the Commission adopt the recommendations in the Department’s September 16, 2014 review of the 2012-2013 annual automatic adjustment reports?

The Minnesota Department of Commerce, Division of Energy Resources (“Department”) noted in Sections I and II of their September 16, 2014 Comments that the utilities have filed the information necessary to meet their filing requirements. Otter Tail agrees with the Department’s recommendation to accept the compliance filings for Section III, A to N as applicable to Otter Tail. The Department also confirmed that the utilities complied with MISO Day 1 reporting requirements in Section VII.

In Section VIII, the Department requested additional information from Otter Tail with regard to Otter Tail’s MISO Day 2 reporting. Otter Tail responded to the Department’s request, providing that information in Reply Comments filed November 10, 2014. Otter Tail has addressed the Department’s questions in its November 10, 2014 Reply Comments and requests Commission approval of Otter Tail’s MISO Day 2 reporting.

Lastly, Otter Tail agrees with the Department’s recommendation that the Commission accept Otter Tail’s Ancillary Services Market (“ASM”) reporting, as summarized in Section IX.

In summary, Otter Tail requests that the Commission adopt the Department’s recommendations as they pertain to Otter Tail’s 2012-2013 AAA report. Otter Tail also requests Commission approval of Otter Tail’s MISO Day 2 reporting.

Should the Commission adopt the recommendations in the OAG-AUD's September 26, 2014 comments?

These Comments are not applicable to Otter Tail Power.

Any other issues parties consider appropriate?

Otter Tail does not have any other issues to address at this time.

III. CONCLUSION

Otter Tail appreciates the opportunity to provide these Additional Comments in this Docket and respectfully requests approval of Otter Tail's 2012-2013 AAA report.

Dated: December 31, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

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