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April 29, 2024



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

**RE: In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards Docket No. E,G-999/M-19-505
In the Matter of a Commission Inquiry into Privacy Policies of Rate-Regulated Energy Utilities, Docket No. E,G-999/CI-12-1344
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail or Company) appreciates the Comments filed in this matter, and the Commission's deliberative, incremental approach to the implementation of the Open Data Access Standards (ODAS).

Otter Tail agrees with the Comments of Minnesota Power, Xcel Energy, and Minnesota Energy Resources Company concerning the release of anonymized customer energy use data (CEUD) specifically that additional use cases should not be adopted at this time. Otter Tail appreciates the Department of Commerce's recommendation supporting the release of anonymized CEUD for study and program design. On balance, however, we continue to believe that the risks and burdens associated with the release of anonymized data warrant caution and continued record development.

Otter Tail remains concerned about the potential burden associated with ODAS contract requirements and concurs with Minnesota Power's concerns in that regard. If the Commission elects to retain current contract standards, we support Xcel's recommendation that those standards should be amended to limit the time a third-party requester can retain anonymized CEUD.

As we noted in our Comments, Otter Tail has thus far received few third-party requests for CEUD. We believe this is attributable to the size and nature of the communities we serve. Although we anticipate more third party requests for CEUD in the future, our situation will fundamentally differ from that of other Minnesota utilities. We appreciate the Commission's sensitivity to these differences.

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 218-739-8956 or cstephenson@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ *CARY STEPHENSON*
Cary Stephenson
Associate General Counsel

lcd
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of a Petition by Citizens Utility Board of Minnesota to Adopt Open Data Access Standards Docket No. E,G-999/M-19-505
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I, Laura Dewey, 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
Reply Comments**

Dated this **29th** day of **April, 2024**.

/s/ LAURA DEWEY
Laura Dewey
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8604

[illegible]

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Andrew	Clearwater	N/A	Future of Privacy Forum	1400 I St NW Ste 450 Washington, DC 20005-6503	Paper Service	No	OFF_SL_19-505_Official
Roger	Colton	roger@fsconline.com	Fisher, Sheehan and Colton	34 Warwick Road Belmont, MA 02478	Electronic Service	No	OFF_SL_19-505_Official
Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No	OFF_SL_19-505_Official
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	Yes	OFF_SL_19-505_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_19-505_Official
Steve	Downer	sdowner@mmua.org	MMUA	3025 Harbor Ln N Ste 400 Plymouth, MN 554475142	Electronic Service	No	OFF_SL_19-505_Official
Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_19-505_Official

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Roger	Colton	roger@fsconline.com	Fisher, Sheehan and Colton	34 Warwick Road Belmont, MA 02478	Electronic Service	No	OFF_SL_12-1344_Official
Sheri	Comer	Sheri.comer@ftr.com	Frontier Communications Corporation	1500 MacCorkle Ave SE Charleston, WV 25396	Electronic Service	No	OFF_SL_12-1344_Official
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	Yes	OFF_SL_12-1344_Official
Stacy	Dahl	sdahl@minnkota.com	Minnkota Power Cooperative, Inc.	5301 32nd Ave S Grand Forks, ND 58201	Electronic Service	No	OFF_SL_12-1344_Official
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Trent	Fellers	Trent.Fellers@windstream.com	Windstream	1440 M St Lincoln, NE 68508	Electronic Service	No	OFF_SL_12-1344_Official

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Craig	Johnson	cjohnson@lmc.org	League of Minnesota Cities	145 University Ave. W. Saint Paul, MN 55103-2044	Electronic Service	No	OFF_SL_12-1344_Official
Nicolle	Kupser	nkupser@greatermngas.com	Greater Minnesota Gas, Inc. & Greater MN Transmission, LLC	1900 Cardinal Ln PO Box 798 Faribault, MN 55021	Electronic Service	No	OFF_SL_12-1344_Official

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Cheri	Lenzmeier	cheril@mvec.net	Minnesota Valley Electric Cooperative	125 Minnesota Valley Electric Dr Jordan, MN 55352	Electronic Service	No	OFF_SL_12-1344_Official
Todd	Liljenquist	todd.liljenquist@mmha.com	Minnesota Multi Housing Association (MHA)	1600 West 82nd Street, Suite 110 Minneapolis, MN 55431	Electronic Service	No	OFF_SL_12-1344_Official
Alison	Lindburg	alindburg@mwalliance.org	Midwest Energy Efficiency Alliance	20 Lower Wacker Drive Suite 1301 Chicago, IL 60606	Electronic Service	No	OFF_SL_12-1344_Official
Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.	505 Nicollet Mall 3rd Floor Minneapolis, MN 55402	Electronic Service	No	OFF_SL_12-1344_Official
Sarah	Marquardt	smarquardt@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
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Craig	McDonnell	Craig.McDonnell@state.mn.us	MN Pollution Control Agency	520 Lafayette Road St. Paul, MN 55101	Electronic Service	No	OFF_SL_12-1344_Official
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_12-1344_Official
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Phyllis	Reha	phyllisreha@gmail.com		3656 Woodland Trail Eagan, MN 55123	Electronic Service	No	OFF_SL_12-1344_Official
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	Yes	OFF_SL_12-1344_Official
Christine	Schwartz	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_12-1344_Official

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Brendon	Slotterback	bslotterback@mcknight.org	The McKnight Foundation	710 S 2nd St Minneapolis, MN 55401	Electronic Service	No	OFF_SL_12-1344_Official
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Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_12-1344_Official
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