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September 1, 2021

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 Otter Tail Power Company's Submittal of its
2022–2036 Integrated Resource Plan
Docket No. E017/RP-21-339
Initial Filing**

Dear Mr. Seuffert:

Enclosed for filing with the Minnesota Public Utilities Commission is Otter Tail Power Company's (Otter Tail) 2021 Integrated Resource Plan (IRP). The IRP identifies a Preferred Plan for meeting the capacity and energy needs of our customers over the 2022-2036 planning period.

The modeling analysis supporting the selection of the Preferred Plan includes the input of numerous stakeholders and has been refined over the course of two years. In the aggregate, the Preferred Plan allows us to reduce costs and maintain and improve resiliency, while having greater control over whether or not to dispatch resources based on market conditions.

To achieve these ends the Preferred Plan includes a request for authority to add dual fuel capability at Astoria Station, add 150 MW solar generation in 2025, and to commence the process of withdrawing from our 35 percent ownership interest in Coyote Station.

The Preferred Plan will result in Otter Tail generating approximately 35 percent of our energy from renewable resources by 2023 meeting Minnesota's greenhouse gas emission-reduction goals. Otter Tail's target is to reduce carbon emissions from generation resources it owns approximately 50% from 2005 levels by 2025, and 97% by 2050. As we make this transition, we are keeping our residential rates among the lowest in the nation.

This filing includes protected data, as defined in Minn. R. 7829.0100, subp. 19a. Specifically, the pre-filing includes two categories of protected data: (1) trade secret information; and (2) customer energy usage data (CEUD).

The trade secret information includes (1) confidential and proprietary energy and capacity forecast data and associated proprietary models, methodologies, and modeling assumptions (Appendices B, F) and (2) confidential estimate for capital and operating costs of anticipated project (IRP).

All of this trade secret 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 OTP to protect the information from public disclosure. This information: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) therefore is protected data under Minn. R. 7829.0100, subp. 19a(A).

The CEUD includes historical and projected usage information of certain large customers. This information is included in Appendix B to this filing. In order to protect the individualized data of these customers. The CEUD is nonpublic data pursuant to Minn. Stat. § 13.02, subd. 9 due to the Commission's January 19, 2017, Order in Docket No. E,G999/CI-12-1344, which requires OTP to refrain from disclosing this data without the customers' consent. As nonpublic data, the CEUD also constitutes not public data, as defined in Minn. Stat. § 13.02, subd. 8a; therefore is protected data under Minn. R. 7829.0100, subp. 19a(A).

For these reasons, we ask that the trade secret information and CEUD be treated as not public data pursuant to the Minnesota Data Practices Act and as protected data under Minn. R. 7829.0500. NOT PUBLIC and PUBLIC versions are included with this filing.

Otter Tail has also provided copies to all other parties on the attached Service List pursuant to Minnesota Rule 7843.0300 Subp.13. The Public version will soon be posted on the Company's website at www.otpc.com.

Should you have any questions, please contact me at njensen@otpc.com or (218) 739-8989.

Sincerely,

/s/ *NATHAN JENSEN*
Nathan Jensen
Manager, Resource Planning

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Enclosures
By electronic service and USPS
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Submittal of its 2022–2036
Integrated Resource Plan
Docket No. E017/RP-21-339**

I, Kim Ward, 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 1st day of **September, 2021**.

/s/ Kim Ward
Kim Ward
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8268

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Laura	Bishop	Laura.Bishop@state.mn.us	MN Pollution Control Agency	520 Lafayette Rd Saint Paul, MN 55155	Electronic Service	No	OFF_SL_21-339_RP-21-339
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-339_RP-21-339
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_21-339_RP-21-339
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kristin W	Duncanson	kristin@duncansongrowers.com		57746 Highway 30 Mapleton, MN 56065	Electronic Service	No	OFF_SL_21-339_RP-21-339
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_21-339_RP-21-339
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_21-339_RP-21-339
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_21-339_RP-21-339
Julie	Goehring	julie@redriverbasincommission.org		708 70 Ave NW Moorhead, MN 56560	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_21-339_RP-21-339
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_21-339_RP-21-339
Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company	215 S. Cascade St. Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kate	Knuth	kate.knuth@gmail.com		2347 14th Terrace NW New Brighton, MN 55112	Electronic Service	No	OFF_SL_21-339_RP-21-339
Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board	42808 Co. Rd. 11 Bird Island, MN 55310	Electronic Service	No	OFF_SL_21-339_RP-21-339
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_21-339_RP-21-339
Jan	Malcolm	Health.Review@state.mn.us	Minnesota Department of Health	PO Box 64975 St. Paul, MN 55164-0975	Electronic Service	No	OFF_SL_21-339_RP-21-339
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_21-339_RP-21-339
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_21-339_RP-21-339
Stephan	Roos	stephan.roos@state.mn.us	MN Department of Agriculture	625 Robert St N Saint Paul, MN 55155-2538	Electronic Service	No	OFF_SL_21-339_RP-21-339
John	Saxhaug	john_saxhaug@yahoo.com		3940 Harriet Ave Minneapolis, MN 55409	Electronic Service	No	OFF_SL_21-339_RP-21-339
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_21-339_RP-21-339
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
Cameron	Winton	winton.cam@dorsey.com	Dorsey & Whitney LLP	50 S 6TH ST STE 1500 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21-339

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_21-339_RP-21- 339