215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
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August 21, 2025

Mr. Mike Bull
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 Petition for a Proposed Energy Storage System Pilot at the University of Minnesota Morris
Docket No. E017/M-25-
Initial Filing

Dear Mr. Bull:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Petition in the above-referenced matter.

Otter Tail has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA in TRADE SECRET Appendix A and Appendix B consists of confidential bidding information, 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 218-739-8639 or jgrenier@otpco.com if you have any questions regarding this filing.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Retail Energy Solutions

kde
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 Petition for a Proposed Energy Storage System Pilot at the University of Minnesota Morris	**Docket No. E017/M-25-** **PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power or Company) submits this Petition to the Minnesota Public Utilities Commission (Commission) under Minn. Stat. §216.B.16 subd. 7e. Energy Storage System Pilot Projects (subd. 7e). The Company's petition provides a report to the Commission that contains information regarding the proposed energy storage system pilot in accordance with subd. 7e, which states:

> (a) A public utility may petition the commission under this section to recover costs associated with implementing an energy storage system pilot project. As part of the petition, the public utility must submit a report to the commission containing, at a minimum, the following information regarding the proposed energy storage system pilot project:
>
> (1) the storage technology utilized;
>
> (2) the energy storage capacity and the duration of output at that capacity;
>
> (3) the proposed location;
>
> (4) the purchase and installation costs;
>
> (5) how the project will interact with existing distributed generation resources on the utility's grid; and
>
> (6) the goals the project proposes to achieve, which may include controlling frequency or voltage, mitigating transmission congestion, providing emergency power supplies during outages, reducing curtailment of existing renewable energy generators, and reducing peak power costs.
>
> (b) A utility may petition the commission to approve a rate schedule that provides for the automatic adjustment of charges to recover prudently incurred investments, expenses, or costs associated with energy storage system pilot projects approved by the commission under this subdivision. A petition filed under this subdivision must include the elements listed in section 216B.1645, subdivision 2a, paragraph (b), clauses (1) to (4), and must describe the benefits of the pilot project.
>
> (c) The commission may approve, or approve as modified, a rate schedule filed under this subdivision. The rate schedule filed by the public utility may include the elements listed in section 216B.1645, subdivision 2a, paragraph (a), clauses (1) to (5).

Through this petition, Otter Tail Power is requesting the following Commission action:

1. Approve the purchase and construction of a 1MW / 6 MWh duration battery energy storage pilot project, with placement on the University of Minnesota Morris campus.
2. Allow the Company cost recovery for all reasonable and prudent project costs, as estimated in Appendix B of this filing, less and applicable tax credits or credits back to the University for a portion of the contribution to the project, with all costs being recovered through the Company's Renewable Resource Cost Recovery Rider (RRCR).
3. Allow the Company to modify its RRCR tariff sheet, Section 13.04 to include the recovery of energy storage pilot project costs, shown in Appendix C.
4. Otter Tail Power shall provide updates and reports to the Commission on the battery pilot project.

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

Pursuant to Minn. Rules 7829.1300, subp. 3, the following information is provided.

A. Name, address, and telephone number of utility
(Minn. Rules 7829.1300, subp. 3(A))

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

B. Name, address, and telephone number of utility attorney
(Minn. Rules 7829.1300, subp. 3(B))

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

C. Date of filing and proposed effective date of rates

(Minn. Rules 7829.1300, subp. 3(C))

The date of this filing is August 21, 2025.

D. Statutes controlling schedule for processing the filing

(Minn. Rules 7829.1300, subp. 3(D))

Minn. Stat. §216.B.16, subd. 7e permits a utility to request approval of a new energy storage pilot project and also permits a utility to implement an associated rate schedule.

E. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, subp. 3(E))

Jason Grenier
Manager
Retail Energy Solutions
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8639

F. Impact on Rates

(Minn. Rules 7829.1300, subp. 3(F))

Costs from the proposed battery project will initially have no effect on Otter Tail Power's base rates. Otter Tail Power requests all approved projects costs be recovered through the Renewable Resource Cost Recovery Rider. The additional information required under this Rule is included throughout the Petition.

G. Service List

(Minn. Rules 7829.0700)

Otter Tail Power 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 Power:

Jason Grenier
Manager
Retail Energy Solutions
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8639
jgrenier@otpco.com

Lauren Donofrio
Senior Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8774
ldonofrio@otpco.com

We request that all communications regarding this proceeding, including information request, also be directed to:

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

H. Service on other parties

(Minn. Rules 7829.1300, subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, subp. 2, Otter Tail Power 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.

IV. DESCRIPTION AND PURPOSE OF FILING

The University of Minnesota Morris (UMN-Morris, the University, or campus) submitted an application to the Minnesota Environmental and Natural Resource Trust Fund in 2021. The proposal's primary request was for funding for planning, acquisition, on-campus installation, and experimentation of a 1-megawatt (MW) flow battery. UMN-Morris specifically discussed its interest in pairing several technologies with grant funding.

> This proposal adds a 1MW / 4MWh flow battery and 175 kW of solar PV generation to UMN Morris's unique, renewable-energy-intensive microgrid, in a research-and-demonstration project aimed at accelerating the pace of Minnesota's transition to clean, reliable, and local energy. The UMN Morris microgrid is an ideal test-bed to explore the optimization of battery-charging and dispatch as part of a dynamic, intermittent system --

optimizing multiple benefits will be a major determinant of the economic viability of an installation.[1]

The battery, primarily fueled by the University's two 1.65 MW wind turbines, over 500kW of solar (completed and planned), and other various energy projects will be an excellent demonstration site for storing locally-produced renewable energy and using it later when renewable energy isn't available to the local community.

UMN-Morris contacted Otter Tail Power Company and Minnesota-based energy technology company, Open Access Technology International (OATI), seeking support for its project. Both companies agreed to support the project with letters of support, staff time, and in Otter Tail Power's case, investment in a new technology that supports the electric system. In 2021, Legislative-Citizen Commission on Minnesota Resources (LCCMR) selected UMN-Morris for funding for the flow-battery and associated research. The University's approved work plan can be found on the LCCMR's website.[2]

Despite the impacts of Covid-19 slowing the project down initially, the project has made significant progress in 2023 through 2025. As this is the first significant battery project for both the Company and the University, together we have spent considerable time carefully defining partner roles, project goals, ownership, operation, and placement of the battery. Otter Tail Power and UMN-Morris have done their due diligence interviewing many battery manufacturers, developing an RFP, bringing an experienced engineering consultant on board, and finally issuing a Request for Proposal (RFP) for the battery.

The University utilized its Category Manager/Contract Specialist from its Purchasing/Controller's office from the main campus in Minneapolis to administer the RFP process. Several battery suppliers issued competitive bids in response to the RFP. The evaluation committee consisted of staff from UMN-Morris and Otter Tail Power. The evaluation committee used the following evaluation criteria to select a battery supplier.

1. Project Approach and Work plan
2. Total Cost to the University[3]
3. Technical Adherence
4. Project Schedule
5. Staffing Plan, Experience, Qualifications, References
6. Supplier Diversity Commitment[4]

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[1] UMN-Morris Work Plan, p. 2, accessed August 15, 2025 at: https://www.lccmr.mn.gov/projects/2021/approved_work_plans/2021-169_approved_workplan_and_map.pdf.
[2] *Id.*
[3] The University's Purchasing office scored criteria number 2.
[4] The University's Office for Supplier Diversity (OSD) scored criteria number 6.

Otter Tail Power has included a summary of the RFP's vendor scoring in **Trade Secret Appendix A**. In addition to the scoring, the evaluation committee is in the process of conducting interviews with references provided by the top scoring battery supplier(s).

Minn. Stat. §216.B.16, subd. 7e(a) sets forth a list of factors utilities must address in making a filing under the statute. Each of the six factors is addressed in turn, below.

216.B.16, subd. 7e(a)(1): Storage Technology Utilized

At the time of this filing UMN-Morris and Otter Tail Power are in the selection phase for the battery energy storage system (BESS). Final selection and negotiations should be completed with the BESS vendor by the end of 2025. The company has competitive bids from BESS vendors offering a variety of technologies, including Vanadium Redox Flow batteries, Zinc Aqueous batteries, and Iron Flow batteries. Some of the features project partners have identified as priority areas for battery selection include:

- **Non-flammable.** The BESS solution should have low to no risk of thermal runaway, nor any need for expensive fire suppression systems.
- **Low O&M costs.** Minimal maintenance costs going forward with simple low-cost solutions for equipment change outs if needed.
- **Long lifespan.** Solution should provide thousands of cycles and include more than 20 years of life.
- **Flat degradation curve**. The BESS should have minimal degradation over its thousands of cycles and 20 plus years of operation.
- **Fully Recyclable.** Chemistries, minerals, and materials making up the BESS shall be abundant, affordable, non-toxic, and all fully recyclable at end of project life.
- **Tariffs.** Tariffs on goods from certain counties could significantly impact overall costs.
- **Tax Credit Eligibility.** Investment Tax Credit eligibility could be impacted if sourcing from foreign entities of concern (FEOC).

216.B.16 subd. 7e(a)(2): The energy storage capacity and the duration of output at that capacity

The battery will be 1MW(AC) and in the range of 4 to 6 MWh(AC) and will be designed to operate at -40 degrees Fahrenheit with minimal capacity degradation. This temperature was a requirement by project partners since the winter temperature in the Morris area will

approach -40 degrees Fahrenheit annually. The battery is also designed to perform up to at least 120 degrees Fahrenheit.

216.B.16 subd. 7e(a)(3): Proposed location

The UMN-Morris has agreed to host the battery. The battery will be placed in an existing field on the north side of the UMN-Morris campus. The University will grant Otter Tail Power an easement for access to the battery at no additional cost to the Company. The battery will be located near walking trails so the University can showcase the new technology on walking tours. Otter Tail Power will be responsible for maintenance within a fenced area, which will surround the battery, for the safety of the public.

216.B.16 subd. 7e(a)(4): Purchase and installation costs

The Company expects the BESS pilot project to qualify for the Investment Tax Credit (ITC) at a forty percent level, but final ITC impacts will not be fully known until further guidance is issued by the Internal Revenue Service (IRS). The Company proposes to credit its recovery rider for all ITC impacts from the project. In the Company's initial review and guidance from tax consultants it appears there will be no negative impact from the recently passed One Big Beautiful Bill on the proposed BESS pilot project.

Based on the bids from the BESS vendors and estimates from additional support services vendors (software, engineering consulting, civil work, fencing, etc.), Otter Tail Power expects the total BESS pilot project to cost **[PROTECTED DATA BEGINS…**

…**PROTECTED DATA ENDS],** which includes the cost of the 1 MW, 4-to-6 MWh battery, site preparation, interconnection, commissioning, consulting services, battery management system software, and other miscellaneous project costs. In addition to its initial capital outlay, the Company also requests all ongoing operations and maintenance costs from the battery to be included for eligibility in its recovery rider. A schedule for the estimated capital and ongoing O&M costs has been included in **TRADE SECRET Appendix B** of this filing.

Once BESS selection and negotiations are complete, the BESS is scheduled to be ordered in the fourth quarter of 2025. Procurement of the BESS, depending on the vendor, takes about nine months to one year. Commissioning will be scheduled to occur in the late third quarter to fourth quarter of 2026 with operations go-live likely in the first quarter of 2027. The LCCMR requires all awarded funds for this project to be utilized by July 1, 2027.

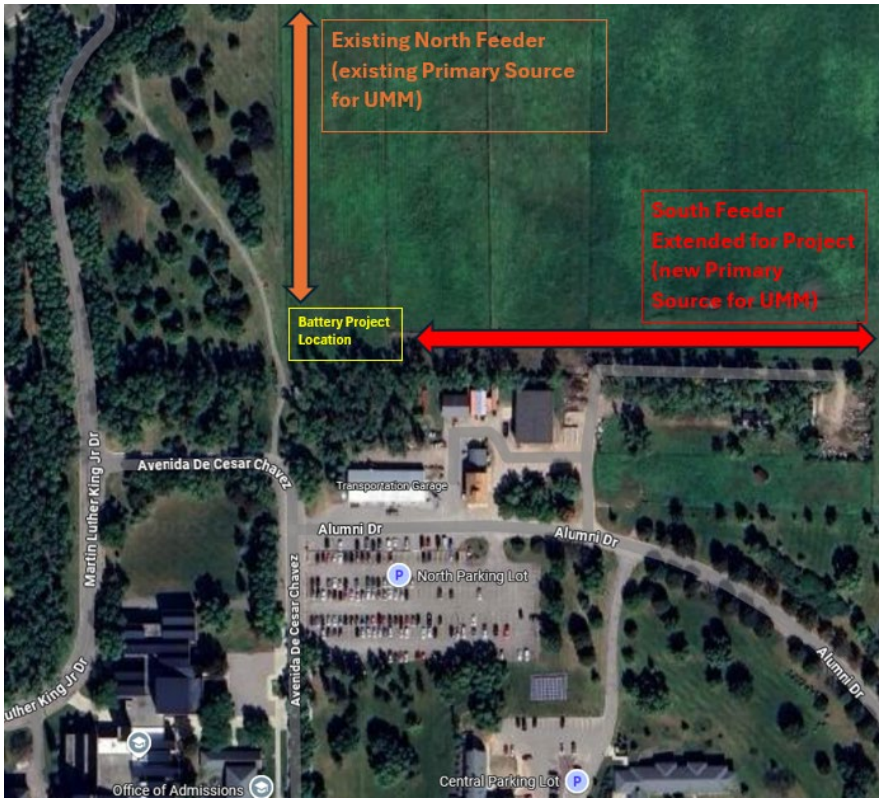
UMN-Moris has agreed to contribute approximately **[PROTECTED DATA BEGINS… …PROTECTED DATA ENDS]** towards the project. This amount will greatly reduce the initial project costs for Otter Tail Power customers. Once

the project's construction is complete, Otter Tail Power has agreed to calculate UMN-Morris's total contribution to the project and provide the University with compensation up to half of its initial capital contribution. The payment will be based on the University's initial contribution and a *pro rata* portion of any investment tax credit (ITC) benefits the Company can claim based on the University's contribution, netted against any additional taxes the Company may be required to pay based on the University's contribution. The University has indicated that any payment to the University will be used to fund future energy research or energy projects on campus. The Company believes its customers are gaining substantial benefits from the University's contribution as it significantly lowers the initial capital outlay for the project and only a portion of the benefits are shared back with the University.

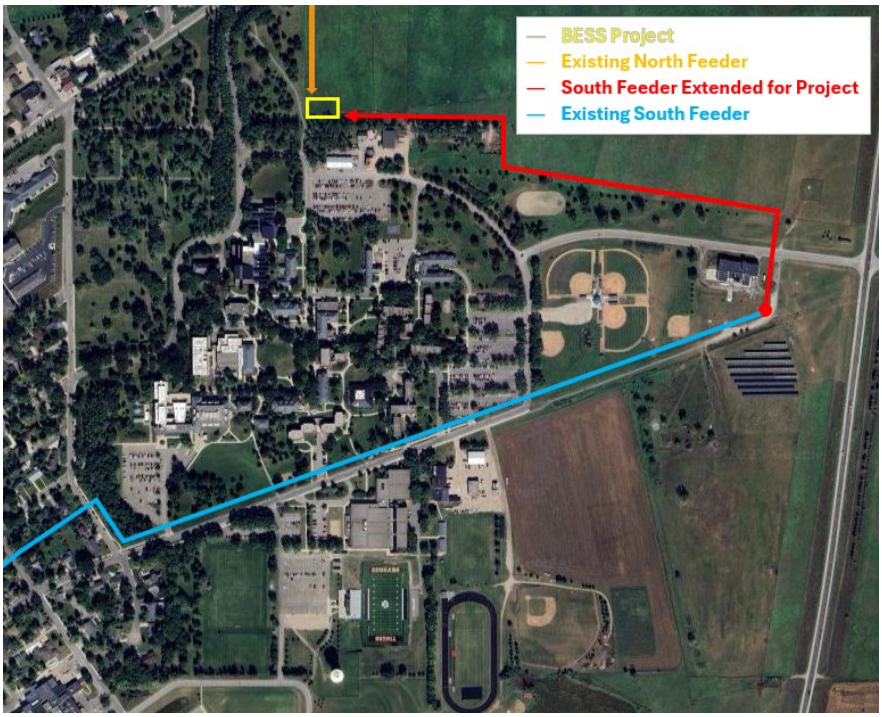
216.B.16 subd. 7e(a)(5): How project will interact with existing distributed generation resource on the utility grid

The battery will be interconnected to Otter Tail Power's distribution system on the Company's side of the University's metering point. This placement allows the battery to directly capture the University's excess renewable energy generation while being owned and operated by the Company to rapidly respond to grid needs. This placement is also near campus parking and a walking path allowing the University to provide on-campus tours to students and visitors, showcasing the battery and how it integrates into its campus and its many other energy projects. Part of the capital for this project will include Otter Tail Power extending its, normally open, south feed to campus around the east side of campus and then west to the existing meeting location. This will replace the Company's existing north feed to campus. Extending the south feeder and making it the primary feed to campus will allow extra capacity for the University, which will allow for even more renewable energy projects in the future. This line extension for the battery interconnection is shown by the red lines in Maps 1 and 2 below.

Map 1: Zoomed In



Map 2: Zoomed Out



216.B.16 subd. 7e(a)(6): the goals the project proposes to achieve, which may include controlling frequency or voltage, mitigating transmission congestion, providing emergency power supplies during outages, reducing curtailment of existing renewable energy generators, and reducing peak power costs.

Otter Tail Power and the University have both shared and independent goals for the battery pilot project. Since this is the first substantial battery project for both partners, we look forward to researching, discovering, and gaining knowledge as we embark into this new technology. It is likely many new items, which are unknown now, will be learned as the project commences. Through the research stage, project partners have learned a significant amount about non-lithium battery chemistries and the benefits and risks of each. Fortunately, for this project, given the BESS selection criteria, we are not concerned with risks associated with other battery chemistries, like thermal runaway, fires, environmental hazards, freezing equipment, or decommissioning complications, but our project team has learned a great deal in these areas. As the BESS is constructed the Company will learn more about the required civil engineering work, battery grounding, and the battery's interconnection, testing, and commissioning.

Once the BESS pilot project is commissioned, Otter Tail Power's goals for the project are as follows:

a. Develop internal processes and assign an internal team to monitor and optimize the BESS's performance and enhance the reliability of the distribution grid.
b. Gain an understanding of necessary BESS maintenance requirements.
c. Learn how the BESS performs during cold-climate operations.
d. Optimize charging or dispatching the BESS based on the energy production of the University's or other local renewables.
e. How to optimize the BESS for energy arbitrage, respond to transmission congestion, or local emergency outage issues. Additional financial value-streams may be identified.
f. This project supports the Company's Integrated Resource Plan (IRP). The MPUC's July 22, 2024, order in Otter Tail Power's 2023-2027 IRP Docket No. E-017/RP-21-339, supports battery storage. MPUC ordering point eleven, part (c) requires the Company to build "no less than 20 MWs and up to 75 MWs of battery storage resources with a minimum of four-hour duration with a commercial operation date of December 31, 2029 or as soon as practicable thereafter."

Insights from the proposed BESS pilot project will also provide guidance for future Otter Tail Power battery projects contained in the IRP.

The University's BESS project goals include:

a. Research a community-scale non-lithium BESS in combination with local and regional solar and wind generation can improve resilience in both the grid and in rural communities
b. Researching future viability of the University having their own BESS behind their meter, what battery chemistry might be best in a cold weather climate, what size battery is needed to interplay with the campus' renewables, should the University pursue a microgrid?
c. What are the potential financial benefits the University can realize from having its own battery on campus to reduce its billed demand and how it can maximize its renewable energy generation to be used on campus.
d. How can the BESS project financially support the University's ongoing energy research and development of future renewable energy, energy-efficiency, or BESS projects.
e. Showcase an innovative energy technology to students, the local community, and University visitors.
f. The economic and technical analysis gained from the project will allow the University to develop a document that will help transfer knowledge for future development. The University plans to present at conferences or association meetings to help utility and energy planners learn from the demonstration and analysis that is gained.

In addition to these goals, the Company has agreed to allow the University to request up to 720 hours annually, over the first three years of the project, to dispatch the battery to certain levels. These test scenarios provide insight into and support the University's ongoing research regarding energy storage and how it interplays with its excess renewable energy production. Otter Tail Power reserves the right to deny requests from the University to maintain system reliability or for other price, energy, capacity, or emergency needs. In addition, the Company has agreed to allow the University to access all project metering data for its research, education, or other reporting purposes.

V. Renewable Resource Cost Recovery Rider

In this filing, the Company requests to include costs associated with the Company owned energy storage system pilot project, for recovery within its RRCR Rider. In

Appendix C, the Company has included its RRCR tariff sheet, Section 13.04, with modified language to incorporate this recovery under Minnesota Statute Section 216B.16, subd. 7e.

VI. CONCLUSION

Energy storage technologies, as proposed in this BESS pilot filing, will be critical to maintain a reliable, resilient, and increasingly renewable energy grid. For the Company to achieve future Minnesota carbon free goals, utility battery energy storage projects will play a vital role. Otter Tail Power's most recent order in its Minnesota IRP requires the Company to explore battery storage technologies.[5] Otter Tail Power's pilot battery proposal in this filing is supported by the Commission's IRP order, has significant contributions from project partners including a local research university, is supported by Minnesota state statute, and is in the best interest of the Company's Minnesota customers. Otter Tail Power requests the Commission to:

1. Approve the purchase and construction of a 1MW / 4-6 MWh duration BESS pilot project, with placement on the University of Minnesota Morris campus.
2. Allow the Company cost recovery for all reasonable and prudent project costs, as estimated in Appendix B of this filing, less any applicable tax credits or credits back to the University for a portion of its contribution to the project, with all costs being recovered through the Company's Renewable Resource Cost Recovery Rider.
3. Allow the Company to modify its Renewable Resource Cost Recovery Rider tariff sheet, Section 13.04, to include the recovery of energy storage pilot project costs, shown in Appendix C.
4. Otter Tail Power shall provide updates and reports on the following BESS pilot project information:

[5] July 22, 2024, order in Otter Tail Power's 2023-2027 IRP Docket No. E-017/RP-21-339, at ordering point 11(c).

Information	Timing	Timing Notes
Construction and schedule updates	Quarterly	Beginning upon Commission approval until the pilot project is in service.
Operational performance data, including: • Round-Trip Efficiency • Maximum Ramp Rate (Charge & Discharge Rates) • Derated Capacity • Highest and lowest temperature of battery operation.	Annually	Beginning one year after the pilot project is in service and continuing for 10 years.
Investment Tax Credit information and calculations		Provided with future cost recovery filings.

Otter Tail Power and its project partners appreciate the Commission's review and consideration of the Company's first Battery Energy Storage System pilot project.

Dated: August 21, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ JASON GRENIER

Jason Grenier
Manager
Retail Energy Solutions
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56537
(218) 739-8639
jgrenier@otpco.com

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Appendix A
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Appendix C
Redline and Clean Versions of the MN Electric Rate Schedule
Section 13.04 – Renewable Resource Cost Recovery Rider

RENEWABLE RESOURCE COST RECOVERY RIDER

DESCRIPTION	RATE CODE
Large General Service – Demand Charge	MRRAD
Large General Service – Energy Charge	MRRAL
Large General Service – SES-Exempt – Demand Charge	MRRD
Large General Service – SES-Exempt – Energy Charge	MRRLG
All Other Service	MRRA
All Other Service – SES-Exempt	MRROT

RULES AND REGULATIONS: Terms and conditions of this rider and the General Rules and Regulations govern use of this schedule.

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's Retail Rate Schedules.

COST RECOVERY FACTOR: There shall be included on each Minnesota Customer's monthly bill a Renewable Resource Cost Recovery charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. Renewable Resource Cost Recovery charges include renewable costs that are eligible for recovery under Minnesota Statute Section 216B.1645 and for annual revenue requirements including operation and maintenance expenses for Company owned Energy Storage System Pilot Project costs that are eligible for recovery under Minnesota Statute Section 216B.16, subd. 7e. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules and will be included in the Resource Adjustment line item on the Customer's bill.

RATE:

RENEWABLE RESOURCE COST RECOVERY		
Energy Charge per kWh:	kWh	kW
Large General Service (a)	($0.00024)	$0.038
Large General Service SES-Exempt (a)	($0.00073)	$0.359
All Other Service	($0.00022)	N/A
All Other Service SES-Exempt	$0.00338	N/A

(a) Rate schedules 10.04 Large General Service, 10.05 Large General Service – Time of Day, 10.06 Super Large General Service, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider.

RENEWABLE RESOURCE COST RECOVERY RIDER

DESCRIPTION	RATE CODE
Large General Service – Demand Charge	MRRAD
Large General Service – Energy Charge	MRRAL
Large General Service – SES-Exempt – Demand Charge	MRRD
Large General Service – SES-Exempt – Energy Charge	MRRLG
All Other Service	MRRA
All Other Service – SES-Exempt	MRROT

RULES AND REGULATIONS: Terms and conditions of this rider and the General Rules and Regulations govern use of this schedule.

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's Retail Rate Schedules.

COST RECOVERY FACTOR: There shall be included on each Minnesota Customer's monthly bill a Renewable Resource Cost Recovery charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. Renewable Resource Cost Recovery charges include renewable costs that are eligible for recovery under Minnesota Statute Section 216B.1645 and for annual revenue requirements including operation and maintenance expenses for Company owned Energy Storage System Pilot Project costs that are eligible for recovery under Minnesota Statute Section 216B.16, subd. 7e. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules and will be included in the Resource Adjustment line item on the Customer's bill. N N N N N

RATE:

RENEWABLE RESOURCE COST RECOVERY		
Energy Charge per kWh:	kWh	kW
Large General Service (a)	($0.00024)	$0.038
Large General Service SES-Exempt (a)	($0.00073)	$0.359
All Other Service	($0.00022)	N/A
All Other Service SES-Exempt	$0.00338	N/A

(a) Rate schedules 10.04 Large General Service, 10.05 Large General Service – Time of Day, 10.06 Super Large General Service, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider.

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Petition for a Proposed Energy Storage System Pilot at the University of Minnesota Morris Docket No. E017/M-25-

I, Khris Ekstrom, 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
Initial Filing

Dated this **21st** day of **August, 2025**.

/s/ KHRIS EKSTROM
Khris Ekstrom
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8334

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
2	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 Energy Storage System Pilot
3	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 Energy Storage System Pilot
4	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 Energy Storage System Pilot
5	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
6	Amber	Grenier	agrenier@otpco com	Otter Tail Power Company		215 S Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
7	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
8	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 Energy Storage System Pilot
9	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 Energy Storage System Pilot
10	Kavita	Maini	kmaini@wi rr com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	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 Energy Storage System Pilot
12	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
13	Generic Notice	Regulatory	regulatory filing coordinators@otpco com	Otter Tail Power Company		215 S Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
14	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 Energy Storage System Pilot
15	Cary	Stephenson	cstephenson@otpco com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Energy Storage System Pilot
16	Stuart	Tommerdahl	stommerdahl@otpco.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 Energy Storage System Pilot