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May 14, 2025



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 Cold Weather Reports (CWR) – Regulated Gas & Electric Companies
Docket No. E, G999/PR-25-2
Comments**

Dear Mr. Seuffert:

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

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 218-739-8443 or ckremeier@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ COLLIN KREMEIER

Collin Kremeier

Supervisor, Customer Care Administration & Outage Management

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Enclosures

By electronic filing

c: Service List

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

**In the Matter of Cold Weather
Reports (CWR) – Regulated Gas &
Electric Companies**

**Docket No. E, G999/PR-25-2
COMMENTS**

I. INTRODUCTION

On February 28, 2025 the Minnesota Public Utilities Commission (Commission) issued notice of a comment period to review issues:

1. Should the Commission take any action on the residential customer status data reported in Docket No. E, G-999/PR-25-2, including service disconnections, payment arrangements, and various customer protections and assistance?
2. Should utilities be required to develop disconnection and payment arrangement policies and make them public? Once the policies are developed, should there be any other modifications made to them?

The notice also offered utilities the ability to respond to comments submitted to by Citizen Utility Board (CUB) and Legal Services Advocay Project (LSAP).

- Per Appendix A, Request #1, would your utility submit a compliance filing in the instant docket detailing its current policies and practices on disconnections, service deposits, and payment agreements?
- Per Appendix A, Request #2, would your utility display its disconnection, service deposit, and payment agreement policies and practices on your website, and explain those procedures in clear, easy-to-understand language?
- Per Appendix A, Request #3, would your utility post the mock language from CUB and LSAP on its website?
- As CUB and LSAP have only recommended the actions listed in Appendix A, and these actions have not been Ordered by the Commission, if your utility would not voluntarily comply with the Requests 1-3, please discuss why doing so is unfeasible or inappropriate

Commission notice noted that topics 4 through 6 from CUB and LSAP' comments intend to be addressed in different dockets.

The February 28, 2025 notice also included the following topics for parties:

Considering the data filed in Docket No. E, G-999/PR-25-2, should any trends in the data be highlighted for the Commission?

- What action, if any, should the Commission require utilities to take to continue exemplary performance or remedy unsatisfactory performance?
- What does an analysis of the data reported in this docket reveal about equitable delivery of utility service?
- How do utilities currently communicate information on disconnection and payment arrangement policies to non-English language speakers, especially to people that do not read their native language?
- Considering Staff's information request (IR) for Xcel filed on December 20, 2024 in Docket No. E, G-999/PR-24-22 and Xcel's IR responses on February 7, 2025, 3 are the utilities following the CWR appeal process in Minn. Stat. 216B.096, Subd. 8?
- Are utilities' heat-affected customers, particularly for customers with electricity service necessary to operate gas heating equipment, being provided with appropriate protections during CWR season (October 1-April 30), including site visits before any disconnections for

II. OTTER TAIL POWER RESPONSES

Otter Tail Power appreciates the opportunity to submit reply comments in this docket. Otter Tail Power generally concurs with the requests put forth by the Citizens Utility Board (CUB) and the Legal Services Advocacy Project (LSAP) in their reply comments submitted on April 18, 2025.

1. Require regulated utilities to submit a compliance filing in the instant docket detailing their current policies and practices on disconnections, service deposits, and payment agreements. Require regulated utilities to submit additional filings in Docket No. E, G-999/PR-YR-02 whenever there are changes to their disconnection, service deposit, and payment agreement

policies and practices. For those companies requiring down payments or service deposits, these reports must include an explanation of how those amounts are determined.

Yes, Otter Tail Power would be willing to submit a compliance filing within the instant docket with respect to our policies and practices surrounding disconnections, service deposits, and payment agreements.

2. Require regulated utilities to display their disconnection, service deposit, and payment agreement policies and practices on their respective websites, and explain those procedures in clear, easy-to-understand language.

Otter Tail Power is willing to display our policies and practices surrounding disconnection, service deposits, and payment agreements on our website. Additionally, during the COVID-19 pandemic we discontinued collecting deposits and has continued to not collect deposits as a part of our normal collection practices.

3. Require regulated utilities to post the following language on their respective websites in a conspicuous place:
 - a. Under Minnesota law, [UTILITY NAME] customers are entitled to a payment agreement for the payment of overdue bills. This payment agreement must consider a customer's financial circumstances and any extenuating circumstances of the household.
 - b. If the payment agreement terms offered are not affordable to you, or if your household is facing financial or extenuating circumstances, you should contact a(n) [UTILITY NAME] customer account representative at [PHONE NUMBER and/or EMAIL ADDRESS].
 - c. If you are unable to reach a mutually agreeable arrangement with a customer account representative, you may appeal the decision with the Minnesota Public Utilities Commission's Consumer Affairs Office. The Consumer Affairs Office can be contacted at 651-296-0406 or 800-657-3782, or by email at consumer.puc@state.mn.us.

Otter Tail Power would be willing to post the mock language proposed by CUB and LSAP. Otter Tail generally has this information within our website however the concise language provided by CUB and LSAP could provide clarity for our customers.

III. CONCLUSION

In conclusion, Otter Tail Power is committed to providing exceptional customer service and ensuring that our customers are well-informed about their rights and options. By agreeing to the requests put forth by CUB and LSAP, we aim to enhance transparency and accessibility of our policies and practices. This will ultimately help us better serve our customers by making it easier for them to understand and navigate our procedures, especially in times of financial difficulty.

Dated: May 14, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ COLLIN KREMEIER

Collin Kremeier

Supervisor, Customer Care

Administration & Outage Management

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

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CERTIFICATE OF SERVICE

RE: In the Matter of Cold Weather Reports (CWR) – Regulated Gas & Electric Companies
Docket No. E, G999/PR-25-2

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
Comments

Dated this **14th** day of **May, 2025**.

/s/ LAURA DEWEY

Laura Dewey
Regulatory Compliance Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8604

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Kristine	Anderson	kanderson@greatermngas.com	Greater Minnesota Gas, Inc.		1900 Cardinal Lane PO Box 798 Faribault MN, 55021 United States	Electronic Service		No	PR-25-2
2	Ryan	Baumtrog	ryan.baumtrog@state.mn.us		Minnesota Dept of Housing	400 Wabasha St N Ste 400 St. Paul MN, 55102 United States	Electronic Service		No	PR-25-2
3	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
4	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		Yes	PR-25-2
5	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
6	Beverly	Dahlberg	bevdahlberg@nweco.com	Northwestern Wisconsin Electric Co.		104 South Pine Street P O Box 9 Grantsburg WI, 54840-0009 United States	Electronic Service		No	PR-25-2
7	Brian	Edstrom	briane@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 Saint Paul MN, 55101 United States	Electronic Service		No	PR-25-2
8	Ron	Elwood	relwood@mnlisap.org	Legal Services Advocacy Project		970 Raymond Avenue Suite G-40 Saint Paul MN, 55114 United States	Electronic Service		No	PR-25-2
9	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	PR-25-2
10	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	PR-25-2
12	Travis	Jacobson	travis.jacobson@mdu.com	Great Plains Natural Gas Company		400 N 4th St Bismarck ND, 58501 United States	Electronic Service		No	PR-25-2
13	Jack	Kegel	jkegel@mmua.org	MMUA		3025 Harbor Lane N Suite 400 Plymouth MN, 55447-5142 United States	Electronic Service		No	PR-25-2
14	Collin	Kremeier	ckremeier@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-	Electronic Service		No	PR-25-2

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						0496 United States				
15	Annie	Levenson Falk	annielf@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota Street, Suite W1360 St. Paul MN, 55101 United States	Electronic Service		No	PR-25-2
16	Jason	Loos	jason.loos@centerpointenergy.com	CenterPoint Energy Resources Corp.		505 Nicollet Mall 3rd Floor Minneapolis MN, 55402 United States	Electronic Service		No	PR-25-2
17	Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	PR-25-2
18	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	PR-25-2
19	Jennifer	Peterson	jppeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	PR-25-2
20	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		Yes	PR-25-2
21	Jodi	Schinzling	jodischinzling@nweco.com	Northwestern Wisconsin Electric Company		104 S. Pine Street Grantsburg WI, 54840 United States	Electronic Service		No	PR-25-2
22	Lori	Schultz	lorischultz@minncap.org	Minnesota Community Action Partnership		MCIT Building 100 Empire Dr Ste 202 St. Paul MN, 55103 United States	Electronic Service		No	PR-25-2
23	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall, MN1180-07-MCA Minneapolis MN, 55401-1993 United States	Electronic Service		No	PR-25-2
24	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	PR-25-2
25	Richard	Stasik	richard.stasik@wecenergygroup.com	Minnesota Energy Resources Corporation (HOLDING)		231 West Michigan St - P321 Milwaukee WI, 53203 United States	Electronic Service		No	PR-25-2
26	Katherine	Teiken	katherine.teiken@state.mn.us			400 Wabasha St N Suite 400 Saint Paul MN, 55102 United States	Electronic Service		No	PR-25-2