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February 14, 2019

Mr. Daniel P. Wolf
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 Revised Utility Tariffs – Filing Establishes Standards and Operation of Distribution Interconnection Process (DIP) and Distribution Interconnection Agreement (MN DIA)
Docket No. E017/M-18-712
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (OTP) appreciates the Department of Commerce's February 1, 2019 comments in regard to Otter Tail's Distributed Energy Resource tariff.

OTP is in the process of updating its tariffs (as it has indicated to Commission Staff), including its Distributed Generation Tariff, Section 12.04. OTP does not disagree with the Department that appropriate references to the MN DIP and MN DIA should be included in OTP's tariffs. To be clear, OTP does not believe it is appropriate or necessary to include the entire MN DP and DIA in its tariffs. The MN DIP and MN DIA are voluminous and every update or change to these standards (or summaries of these standards) would trigger a tariff revision filing.

OTP will provide the MN DIP and MN DIA on its website with summary information to help guide customers. Beyond that, OTP believes that each utility should have reasonable discretion on the amount of detail to include in its tariffs because each utility has a different tariff structure. We believe this approach is better than adopting specific topics or issues that must be addressed in a particular tariff.

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If you have any questions, please contact me at 218-739-8947 or at dpawlowski@otpc.com .

Sincerely,

/s/ DEAN PAWLOWSKI
Dean Pawlowski
Principal Engineer
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mmo
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Revised Utility Tariffs – Filing Establishes Standards and Operation of Distribution Interconnection Process (DIP) and Distribution Interconnection Agreement (MN DIA)
Docket No. E017/M-18-712**

I, Mikayla Osterman, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf 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 **14th** day of **February, 2019**.

/s/ MIKAYLA OSTERMAN _____

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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
John	McWilliams	jmm@dairy.net.com	Dairyland Power Cooperative	3200 East Ave SPO Box 817 La Crosse, WI 54601-7227	Electronic Service	No	OFF_SL_18-712_M-18-712
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, Minnesota 55120	Electronic Service	No	OFF_SL_18-712_M-18-712
Tim	Mergen	tmergen@meecker.coop	Meecker Cooperative Light And Power	1725 US Hwy 12 E. Suite 100 PO Box 68 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-712_M-18-712
Alan	Miller	N/A		2210 20th St NE Stewartville, MN 55976	Paper Service	No	OFF_SL_18-712_M-18-712
Darrick	Moe	darrick@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-712_M-18-712
David	Moeller	dmoeller@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022093	Electronic Service	No	OFF_SL_18-712_M-18-712
Dalene	Monsebroten	dalene@mncable.net	Northern Municipal Power Agency	123 2nd St W Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_18-712_M-18-712
Michael	Monsrud	mmonsrud@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Paper Service	No	OFF_SL_18-712_M-18-712
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Murtaugh	mmurtaugh@fmcs.coop	Freeborn-Mower Cooperative Services	2501 Main Street East Albert Lea, MN 56007	Electronic Service	No	OFF_SL_18-712_M-18-712
Tony	Nelson	tnelson@itasca-mantrap.com	Itasca-Mantrap Coop. Electric Assn.	PO Box 192 Park Rapids, MN 56470	Electronic Service	No	OFF_SL_18-712_M-18-712
Ben	Nelson	benn@cmpasgroup.org	CMPMA	459 South Grove Street Blue Earth, MN 56013	Electronic Service	No	OFF_SL_18-712_M-18-712
David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-712_M-18-712
Michael	Noble	noble@fresh-energy.org	Fresh Energy	Hamm Bldg., Suite 220 408 St. Peter Street St. Paul, MN 55102	Electronic Service	No	OFF_SL_18-712_M-18-712
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220 Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_18-712_M-18-712
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_18-712_M-18-712
Timothy	O'Leary	toleary@llec.coop	Lyon-Lincoln Electric Cooperative, Inc	P.O. Box 639 Tyler, MN 561780639	Electronic Service	No	OFF_SL_18-712_M-18-712
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, Minnesota 55362	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248 Madison, SD 570420248	Electronic Service	No	OFF_SL_18-712_M-18-712
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-712_M-18-712
Bethany	Owen	bowen@mnpower.com	Minnesota Power	30 West Superior Street Duluth, MN 55802	Electronic Service	No	OFF_SL_18-712_M-18-712
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive Belmont, CA 94002	Electronic Service	No	OFF_SL_18-712_M-18-712
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_18-712_M-18-712
Dean	Pawlowski	dpawlowski@otpc.com	Otter Tail Power Company	PO Box 496 215 S. Cascade St. Fergus Falls, MN 565370496	Electronic Service	No	OFF_SL_18-712_M-18-712
Susan	Peirce	Susan.Peirce@state.mn.us	Department of Commerce	85 Seventh Place East St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-712_M-18-712
Joyce	Peppin	joyce@mrea.org	Minnesota Rural Electric Association	11640 73rd Ave N Maple Grove, MN 55369	Electronic Service	No	OFF_SL_18-712_M-18-712
Mary Beth	Peranteau	mperanteau@wheelerlaw.com	Wheeler Van Sickle & Anderson SC	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_18-712_M-18-712
Jeff M	Peters	jeff.peters@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, MN 57109-8920	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Donna	Pickard	dpickardgsss@gmail.com	Genie Solar Support Services	1215 Lilac Lane Excelsior, MN 55331	Electronic Service	No	OFF_SL_18-712_M-18-712
Mike	Pontius	mpontius@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-712_M-18-712
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-712_M-18-712
Gregory	Randa	granda@lakecountrypower.com	Lake Country Power	2810 Elida Drive Grand Rapids, MN 55744	Electronic Service	No	OFF_SL_18-712_M-18-712
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Michael	Reinertson	michael.reinertson@avanteenergy.com	Avant Energy	220 S. Sixth St. Ste 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-712_M-18-712
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Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206 St. Paul, MN 551011667	Electronic Service	No	OFF_SL_18-712_M-18-712
Darla	Ruschen	d.ruschen@bcrea.coop	Brown County Rural Electric Assn.	PO Box 529 24386 State Highway 4 Sleepy Eye, MN 56085	Electronic Service	No	OFF_SL_18-712_M-18-712
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Jacob J.	Schlesinger	jschlesinger@kfwlaw.com	Keyes & Fox LLP	1580 Lincoln St., Suite 880 Denver, CO 80203	Electronic Service	No	OFF_SL_18-712_M-18-712
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Ronald J.	Schwartau	rschwartau@noblesce.com	Nobles Cooperative Electric	22636 U.S. Hwy. 59 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-712_M-18-712
Rob	Scott Hovland	rob.scott-hovland@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_18-712_M-18-712

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Dean	Sedgwick	N/A	Itasca Power Company	PO Box 455 Spring Lake, MN 56680	Paper Service	No	OFF_SL_18-712_M-18-712
David	Shaffer	shaff081@gmail.com	Minnesota Solar Energy Industries Project	1005 Fairmount Ave Saint Paul, MN 55105	Electronic Service	No	OFF_SL_18-712_M-18-712
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Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_18-712_M-18-712
Felicia	Skaggs	fskaggs@meeker.coop	Meeker Cooperative Light & Power	1725 US Highway 12 E Suite 100 Litchfield, MN 55355	Electronic Service	No	OFF_SL_18-712_M-18-712
Glen	Skarbakka	glen@s-pllc.com	Skarbakka PLLC	5411 Bartlett Blvd Mound, MN 55364	Electronic Service	No	OFF_SL_18-712_M-18-712
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, Minnesota 55402	Electronic Service	No	OFF_SL_18-712_M-18-712
Rafi	Sohail	rafi.sohail@centerpointenergy.com	CenterPoint Energy	800 LaSalle Avenue P.O. Box 59038 Minneapolis, MN 554590038	Electronic Service	No	OFF_SL_18-712_M-18-712
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Robyn	Sonstegard	robynnsec@wiktel.com	North Star Electric Cooperative, Inc.	PO Box 719 441 State Hwy 172 NW Baudette, MN 56623	Electronic Service	No	OFF_SL_18-712_M-18-712
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Mike	Steckelberg	msteckelberg@grenergy.com	Great River Energy	12300 Elm Creek Boulevard Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_18-712_M-18-712
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_18-712_M-18-712
Sherry	Swanson	sswanson@noblesce.com	Nobles Cooperative Electric	22636 US Highway 59 PO Box 788 Worthington, MN 56187	Electronic Service	No	OFF_SL_18-712_M-18-712
Thomas P.	Sweeney III	tom.sweeney@easycleanenergy.com	Clean Energy Collective	P O Box 1828 Boulder, CO 80306-1828	Electronic Service	No	OFF_SL_18-712_M-18-712
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_18-712_M-18-712
Bryant	Tauer	btauer@whe.org	Wright-Hennepin	6800 Electric Dr Rockford, MN 55373	Electronic Service	No	OFF_SL_18-712_M-18-712

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Steve	Thompson	stevet@cmpasgroup.org	Central Minnesota Municipal Power Agency	459 S Grove St Blue Earth, MN 56013-2629	Paper Service	No	OFF_SL_18-712_M-18-712
Daniel	Tonder	d.tonder@mnpower.com	Minnesota Power	PO Box 60 Little Falls, MN 56345	Electronic Service	No	OFF_SL_18-712_M-18-712
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Jeff	Triplett	triplettj@powersystem.org	MREA	10710 Town Square Dr NW St 201 Minneapolis, MN 55449	Electronic Service	No	OFF_SL_18-712_M-18-712
Adam	Tromblay	atromblay@noblesce.com	Nobles Cooperative Electric	22636 US Hwy. 59 P.O. Box 788 Worthington, MN 56187-0788	Electronic Service	No	OFF_SL_18-712_M-18-712
Lise	Trudeau	lise.trudeau@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-712_M-18-712
Craig	Turner	cturner@dakotaelectric.com	Dakota Electric Association	4300 - 220th Street West Farmington, MN 550249583	Electronic Service	No	OFF_SL_18-712_M-18-712
Alan	Urban	alan.m.urban@xcelenergy.com	Xcel Energy	N/A	Electronic Service	No	OFF_SL_18-712_M-18-712
Sam	Villella	sdvillella@gmail.com		10534 Alamo Street NE Blaine, MN 55449	Electronic Service	No	OFF_SL_18-712_M-18-712
Sarah	Walinga	swalinga@solarcity.com	Energy Freedom Coalition	3055 Clearview Way San Mateo, MN 94402	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Robert	Walsh	bwalsh@mnvalleyrec.com	Minnesota Valley Coop Light and Power	PO Box 248 501 S 1st St Montevideo, MN 56265	Electronic Service	No	OFF_SL_18-712_M-18-712
Roger	Warehime	warehimer@owatonnautilities.com	Owatonna Public Utilities	208 South WalnutPO Box 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_18-712_M-18-712
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_18-712_M-18-712
Elizabeth	Wefel	eawefel@flaherty-hood.com	Flaherty & Hood, P.A.	525 Park St Ste 470 Saint Paul, MN 55103	Electronic Service	No	OFF_SL_18-712_M-18-712
John	Williamson	John.Williamson@state.mn.us	Minnesota Department of Labor and Industry	443 Lafayette Rd N St. Paul, MN 55155-4341	Electronic Service	No	OFF_SL_18-712_M-18-712
Danielle	Winner	danielle.winner@state.mn.us	Department of Commerce	85 7th Place East Suite 500 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_18-712_M-18-712
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_18-712_M-18-712
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	OFF_SL_18-712_M-18-712
Terry	Wolf	terry.wolf@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_18-712_M-18-712

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Thomas J.	Zaremba	TZaremba@wheelerlaw.com	WHEELER, VAN SICKLE & ANDERSON	44 E. Mifflin Street, 10th Floor Madison, WI 53703	Electronic Service	No	OFF_SL_18-712_M-18-712