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June 6, 2025

Mr. 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 Petition for Approval of a Thermal Technology Market Energy Rate Section 14.16
Docket No. E017/M-25-
Initial Filing

Dear Mr. Seuffert:

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

Otter Tail Power has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA in the Petition, 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.

If you have any questions regarding this filing, please contact me at 218-739-8774 or ldonofrio@otpco.com.

Sincerely,

/s/ LAUREN D. DONOFRIO
Lauren D. Donofrio
Senior Associate General Counsel

vjm
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 Approval of a Thermal Technology Market Energy Rate Section 14.16	**Docket No. E017/M-25-** **PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power or Company) hereby petitions the Minnesota Public Utilities Commission (Commission) for approval of a new Thermal Market Energy Pricing (TMEP) rider, Tariff Section 14.16. The Company developed this new rider to address the specific needs of thermal energy customers who take interruptible service tied to the operation of a specific renewable generator. This tariff is only available to customers who meet specific operational and technological criteria as outlined in this Petition. Otter Tail Power does not currently have any Minnesota customers prepared to take service under this tariff. The Company filed in South Dakota requesting approval of an identical tariff[1] and plans to file an identical request in North Dakota shortly. Otter Tail Power filed in South Dakota first because the Company has a customer located in South Dakota who would take service under this rider, likely beginning in late summer of 2025.

This proposed tariff has similar attributes to a new Market Energy Rate tariff the Company will also be seeking approval of in a separate docket that will replace currently closed portions of its voluntary Large General Service (LGS) Rider, tariff Section 14.03 related to System Marginal Energy Pricing (SMEP) and the voluntary Real Time Pricing (RTP or RT Pricing) tariff Section 14.02. Service provided under the new TMEP rider would not be subject to the Company's Energy Adjustment Rider (EAR), which is consistent with how similar LGS Rider market rates, namely the SMEP and RTP, are handled today, nor would the associated costs or kilowatt hours (kWhs) be included in the calculation of the Company's

[1]South Dakota Public Utilities Commission Docket No. EL25-017, In the Matter of Otter Tail Power Company's Petition for Approval of a Thermal Technology Market Energy Rate Section 14.16. Petition dated April 21, 2025.

EAR rates other retail customers pay. Customers on the new Market Energy Rate tariff the Company will propose will likewise not be subject to the EAR.

Service under this market rate will not rely directly on Otter Tail Power generation resources but rather will rely on the broader Midcontinent Independent System Operator (MISO) market for procurement and associated hourly market pricing. As such, the Company proposes to exclude loads served under this rate from Otter Tail Power's E2 allocation factor, which allocates significant portions of the Company's generation resources jurisdictionally and across customer classes. The Company proposes the effective date of the tariff Section 14.16 to be January 1, 2026.

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, electronic 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
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8774
ldonofrio@otpco.com

C. Date of filing and proposed effective date of rates
(Minn. Rules 7829.1300, subp. 3(C))

The date of this filing is June 6, 2025. Otter Tail Power requests that the proposed Thermal Market Energy Pricing Rider become effective January 1, 2026, or on the first day of the month following Commission approval, should its decision be thereafter.

D. Statutes controlling schedule for processing the filing
(Minn. Rules 7829.1300, subp. 3(D))

This filing is a "miscellaneous tariff filing" as defined by the Commission's rules at Minn. Rules 7829.0100, subp. 11. No determination of Otter Tail Power's overall revenue requirement is necessary (or required under the Statute). Minn. Rules 7829.1400, subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Title of utility employee responsible for filing
(Minn. Rules 7829.1300, subp. 3(E))

Amber Grenier
Manager, Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8728
agrenier@otpco.com

F. Impact on Rates
(Minn. Rules 7829.1300, subp. 3(F))

The proposed voluntary rider, Thermal Market Energy Pricing rider has no effect on Otter Tail Power's base rates. 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:

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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 TMEP Rider will provide qualifying new thermal energy storage customers with a rate option that will allow them to take price signals and ramp usage up or down based upon market prices, bound by the output of a specific renewable energy resource.

A. Detailed Description Of The Tmep Rider

Otter Tail Power designed the voluntary TMEP rider to provide a non-firm level of service to a customer using specific technology that uses electricity to create and store heat in a thermal storage facility. Thermal storage facilities are tied to a specific nearby wind and/or solar generation resource and only operate (procure electricity as a load) when that specific resource is actively producing electricity. The amount of electricity the specific generator produces limits the amount of electricity the thermal storage facility may consume. As outlined in tariff Section 14.16, included as Attachment A to this Petition, a customer taking service under this tariff must meet several criteria to qualify for the TMEP rider. Generally, the customer must be a large (at least 25 MW), low-load factor (less than 50 percent), new greenfield thermal storage facility with its non-firm load tied to and limited by the output of a specific wind or solar generator not owned by the Company, and be registered as a MISO load modifying resource, among other requirements set out in the tariff:

> **AVAILABILITY:**
> This rider is available on a voluntary basis only to new greenfield customers and locations that use specific thermal storage technology, have a Demand of at least 25 MW, and have a load factor less than 50 percent. The Customer's entire thermal load must be registered as a load modifying resource in Midcontinent Independent System Operator (MISO) and take service coincident with and not to exceed the hourly generating output of a nearby specifically identified wind and/or solar generation resource that is not owned by the Company. MISO must have established a new Asset Owner and Commercial Pricing Load Node (CP Node) associated with the Customer's load for market settlement purposes.

The TMEP rider supplements a firm level of service provided to the thermal facility, as will be specified in each new customer's Electric Service Agreement (ESA) and billed under the Large General Service (LGS) tariff applicable to the customer. The ESA must also address incremental fixed and/or variable service costs necessary to provide service to the customer and maintain net benefits. The customer's ESA will also establish the firm Baseline Demand level, which is used for standard LGS rate billing purposes, and to establish the level to which the non-firm level of service under the TMEP rider can be curtailed.

B. Billing And Operational Requirements Under The Tmep Rider:

1. Billing Components

As noted above, a customer's monthly bill for energy will be calculated in two parts: (1) energy consumed up to and including the Baseline Demand(s), and (2) energy consumed above the Baseline Demand(s).

Otter Tail Power will calculate the monthly bill for the firm energy consumed up to and including the Baseline Demand(s) by multiplying the customer's metered energy consumption by the energy rate provided in the LGS tarrif applicable to the customer. Customers will also be responsible for the non-energy portions of the LGS tariff including the customer charge, facilities charge, and demand charges. Customers will also pay applicable riders, including, but not limited to, Energy Adjustment Rider (EAR), Energy Conservation and Optimization (ECO) Rider, Transmission Cost Recovery (TCR) Rider, Renewable Resource Cost Recovery (RRCR) Rider, Uplift Program Rider, Environmental Cost Recovery (ECR) Rider, Revenue Deoupling Mechanism (as applicable), Energy-Intensive Trade-Exposed (EITE) Rider, and Electric Utility Infrastructure Cost (EUIC) Recovery Rider on their firm loads.

The Company will calculate the monthly bill for the non-firm energy consumed above the Baseline Demand(s) under the TMEP rider by taking the net amount of the MISO market settlements that occur at the customer-specific Commercial Pricing (CP) node within MISO, then adding Network Integrated Transmission Service (NITS) charges, and the customer charge. Customers on the TMEP will also be responsible for the ECO Rider and the EITE Rider on their non-firm energy consumed above their Baseline Demand.

The bill will also include a third part, which will address any incremental fixed and/or variable service costs necessary to provide service to the customer and maintain net benefits. Each customer presents a unique set of circumstances with a minimum load of 25 MW, a level large enough to individually affect the recovery of system costs. For this reason, the Company designed the TMEP rider to allow for additional negotiated rate charges,

[PROTECTED DATA BEGINS…
…PROTECTED DATA ENDS] that will appear in the customer's ESA.

Otter Tail Power intends that each customer on the TMEP rider will provide a benefit to the system. **[PROTECTED DATA BEGINS…**

…PROTECTED DATA ENDS] Below is an <u>example</u> of how the Company would calculate a hypothetical bill under the TMEP rider:

Table 1 – Three-Part Billing Concept

Line	Billing Component	Charge Type	Component Source
Part I - Energy consumed up to and including the Baseline Demand			
1	**LGS Base Rate** (applicable rate code)	Per kW, per kWh and Customer Charges	Set in rate case
2	**Applicable Riders**		
3	Energy Adjustment	Per kWh charge	Set annually in EAR rider filing
4	Energy Conversion and Optimization (ECO)	Per kWh charge	Set annually in ECO rider filing
5	Transmission Cost Recovery (TCR)	Per kW and per kWh charges	Set annually in TCR rider filing
6	Renewable Resource Cost Recovery (RRCR)	Per kW and per kWh charges	Set annually in RRCR rider filing
7	Uplift Program	Fixed charge	Set annually in Uplift Report

8	Environmental Cost Recovery	% of bill charge	Set annually in ECR Report filing[2]
9	Revenue Decoupling Mechanism (RDM)	Per kWh charge	Set annually in the RDM filing
10	Energy-Intensive, Trade-Exposed (EITE)	Per kWh charge	Set annually in the EITE filing
11	Electric Utility Infrastructure Cost (EUIC) Recovery	Per meter charge	Set annually in the EUIC filing
12			**Lines 3 + 4 + 5 + 6 + 7 + 8 + 9 + 10 + 11**
13		**Total Part I**	**Line 1 + Line 12**
Part II – Energy consumed above Baseline Demand			
14	**TMEP Rider**		
15	Market Energy (Asset owner/CP node)	DA and RT charges and credits for all kWh plus other MISO market tariff charges	MISO settlement statement (Asset Owner /CP node)
16	Network Integration Transmission Service	KW and/or kWh charge, as applicable	Set by MISO
17	Customer Charge	Per customer	Set in Tariff
18		Subtotal	**Lines 15 + 16 + 17**
	Applicable Riders		
19	Energy Conversion and Optimization (ECO) Rider	Per kWh charge	Set annually in ECO rider filing
20	Energy-Intensive, Trade-Exposed (EITE)	Per kWh charge	Set annually in the EITE filing
21		Subtotal	**Lines 19 + 20**
22		**Total Part II**	**Line 18 + Line 21**
Part III – ESA and Miscellaneous[3]			
[PROTECTED DATA BEGINS...			
			...PROTECTED DATA ENDS]
25		**Total Part III**	**Lines 23 + 24**
26		**TOTAL COMBINED BILL**	**Line 13 + Line 22 + Line 25**

This billing example shows, in general terms, how the Company would calculate the three parts of the Customer's bill and provides the source of each billing component. There are other items that can appear on a customer's bill

[2] The Environmental Cost Recovery rider is currently inactive.

[3] Miscellaneous can include any voluntary riders, late charges, or other unrelated items that might appear on a customer's bill.

related to other voluntary riders, late fees, etc., or other services the customer may have, which are not shown in this example.

2. Operational Requirements

A customer taking service under the TMEP rider would be registered as a separate Asset Owner in MISO, which will allow costs related to energy procured in both the Day Ahead (DA) and Real Time (RT) markets to be isolated in separate settlement statements from MISO for each customer on this rate rider (see billing example Line 10).

Each day, the TMEP customer will provide the Company with its expected hourly load for the next business day,[4] if the hourly load can be procured at a price acceptable to the customer. The customer will also provide the maximum price it would be willing to pay for energy for the next day. The Company will submit that load to MISO and subsequently communicate back to the customer each day, the amount of load that cleared for each hour in the MISO DA market and the associated hourly DA price. MISO allows utilities to procure energy from the DA market through the use of a price sensitive bid, where the utility can set a maximum price that it is willing to pay for energy in any given hour. Otter Tail Power will use a price sensitive bid for customers on the TMEP based upon the pricing information the customers provide to the Company. If an hourly DA price clears above the price the utility is willing to pay, the energy will not clear for those hours. In such an instance, the Company would notify the customer that if it operates during those hours, it will do so at RT market prices, not DA market prices, and may be subject to additional MISO charges. During the operating day, the customer will operate its facility (manage its load) consistent with, but not in excess of, the output of the specifically identified wind or solar facility.

As mentioned above, MISO will provide separate settlements statements to Otter Tail Power for the hourly DA and RT energy costs incurred by the TMEP customer, as well as all other MISO market charges associated with the TMEP load and energy procured under this tariff. Any deviations in the hourly load between the DA and RT will be settled at the RT prices. The separate MISO settlement statements for each TMEP customer will capture

[4] On Fridays the TMEP customer will provide expected loads for Saturday through Monday to the Company. Similarly, the TMEP customer will provide expected loads for holidays by 7 am on last business day preceding a holiday. In the future it may be possible for updated bids to be placed on weekends and holidays as well.

these costs. The TMEP customer will be responsible for all MISO costs, associated adders, and applicable Riders each month.

C. Applicability Of Riders To Market Energy

The TMEP rider provides an opportunity for the non-firm energy above the customer's Baseline Demand to be procured by the Company for the customer from the MISO market, provided the customer's load does not exceed the generation output of the nearby, specifically identified solar or wind resource designated in the customer's ESA. Because the designated solar or wind resource will not be one owned by Otter Tail Power, the Company's generation resources are not directly aligned with the load. This means that all costs associated with the TMEP rider market energy are isolated from the Company's existing generation and loads scheduled within the MISO market. Separate MISO settlement statements ensure all market costs are captured separate from Otter Tail Power's generation or loads in the MISO market. As such, sales under the TMEP rider will not be subject to the Energy Adjustment Rider, Renewable Resource Cost Recovery Rider, Environmental Cost Recovery Rider, Revenue Decoupling Mechanism, Transmission Cost Recovery Rider and Uplift as noted in the Mandatory Riders – Applicability Matrix, Section 13.00, included in Attachment B in this petition.

The non-firm kWhs procured under the TMEP rider would be subject to the annual ECO and EITE rider charges.

D. Market Energy Excluded From Energy Allocator

As noted above, non-firm market energy procured under the TMEP rider does not rely on the Company's generation resources. Otter Tail Power is also not obligated to provide capacity to support that energy. The non-firm load procured under the TMEP rider will be registered as a Load Modifying Resource (LMR) within MISO and is fully curtailable if needed for system reliability needs.[5] Otter Tail Power's E2 allocator is typically used to allocate a significant portion of the costs of the Company's energy generation resources across its jurisdictions and classes. Because all kWhs and associated energy costs are separately being captured through separate MISO settlement statements under this tariff, and those kWhs are not included in Otter Tail Power's future resource planning, the kWhs should be excluded from the E2 allocation factor. The inclusion of TMEP rider

[5] All of the non-firm load is curtailable, but the firm load is not.

kWhs in the E2 allocator would shift more costs to Minnesota in future rate setting proceedings.

E. Administrative Updates To Other Tariff Sections

Table 2 below summarizes administrative updates to a number of Tariff Sections that are included for purposes of incorporating the impacts of the TMEP Rider into Otter Tail Power's Tariff. Redline and clean versions of updated tariff sections listed below are included as Attachment B to this Petition.

Table 2

Tariff Section	Description	Changes
	All Tariff sheets included with this filing.	Replaced Bruce G. Gerhardson with our Manager of Regulation & Retail Energy Solutions, Stuart D. Tommerdahl, in the footer of each tariff.
00.00	Minnesota Index	Section 14.16 Thermal Market Energy Pricing Rider added to Section 14.00 on page 5.
13.00	Mandatory Riders - Applicability Index	Section 14.16 Thermal Market Energy Pricing Rider added on page 2.
13.01	Energy Adjustment Rider	The list of how the cost of energy shall be determined in this Rider has been updated on page 3 to exclude any Market Energy related costs under Section 14.16.
13.02	Energy Conservation and Optimization (ECO) Rider	Section 14.16 Thermal Market Energy Pricing Rider added to the Rate Box on page 2.
13.08	Environmental Cost Recovery Rider	Section 14.16 Thermal Market Energy Pricing Rider added as an exemption from the Application of Rider and Cost Recovery Factor on page 1.
13.11	Electric Utility Infrastructure Cost (EUIC) Recovery Rider	Section 14.16 Thermal Market Energy Pricing Rider added as an exemption from the Application of Rider and Cost Recovery Factor on page 1.
14.00	Voluntary Riders – Availability Matrix	Section 14.16 Thermal Market Energy Pricing Rider added on pages 1 and 2.

F. Customer Notification

Otter Tail will include a notice to Minnesota customers on January bills of the proposed implementation of the new TMEP rider. Attachment C is a sample of the notice.

V. CONCLUSION

Otter Tail Power will offer the voluntary TMEP rider to a new, unique type of customer seeking to utilize specific thermal storage technology and operated in a way that does not exceed the output of a specific solar or wind resource, among other criteria. For the reasons described in this Petition, Otter Tail Power respectfully requests approval of the new Thermal Market Energy Pricing rider, Tariff Section 14.16, and the administrative updates to the other Tariff Sections identified above.

Date: June 6, 2025

Respectfully submitted:

OTTER TAIL POWER COMPANY

/s/ AMBER GRENIER
Amber Grenier
Manager, Regulatory Economics
Regulation & Retail Energy Solutions
Otter Tail Power Company
Phone (218) 739-8728

Attachment A
Clean Version of New Electric Rate Schedule

Section 14.16 – Thermal Market Energy Pricing Rider

THERMAL MARKET ENERGY PRICING RIDER N

DESCRIPTION	RATE CODE
Transmission Service	M657
Primary Service	M658
Secondary Service	M659

N
N
N
N
N

<u>RULES AND REGULATIONS</u>: Terms and conditions of this electric rate schedule and the N
General Rules and Regulations govern use of this rider. N

<u>MANDATORY AND VOLUNTARY RIDERS</u>: The amount of a bill for service will be N
modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders N
selected by the Customer, unless otherwise noted in this rider. See Sections 12.00, 13.00 and N
14.00 of the electric rates for the matrices of riders. N

<u>TERM OF SERVICE</u>: Service under this rider shall be for a period not less than one year. N
The Customer shall take service under this rider by either signing a new electric service N
agreement (ESA) with the Company or by entering into amendments of existing ESA that N
covers new Energy requirements that sets forth, among other things, the Customer's Billing N
Demand(s), firm Demand, and Baseline Demand(s). The ESA must address incremental fixed N
and/or variable service costs necessary to provide service to the Customer and maintain net N
benefits. A Customer who voluntarily cancels service under this rider is not eligible to receive N
service again under this rider for a period of one year. N

<u>AVAILABILITY</u>: This rider is available on a voluntary basis only to new greenfield N
customers and locations that use specific thermal storage technology, have a Demand of at least N
25 MW, and have a load factor less than 50 percent. The Customer's entire thermal load must N
be registered as a load modifying resource in Midcontinent Independent System Operator N
(MISO) and take service coincident with and not to exceed the hourly generating output of a N
nearby specifically identified wind and/or solar generation resource that is not owned by the N
Company. MISO must have established a new Asset Owner and Commercial Pricing Load N
Node (CP Node) associated with the Customer's load for market settlement purposes. N

The Customer will have no behind the Meter generation except for emergency backup N
purposes. N

METERING REQUIREMENTS: Company approved metering equipment capable of providing load interval information is required for Rider participation. The Customer agrees to pay for the additional cost of such metering when not provided in conjunction with existing retail electric service. **N N N N**

CUSTOMER EQUIPMENT: Customers taking service under this Rider shall provide equipment to maintain a power factor at a level no less than the level at which power factor penalties would be invoked under the Tariff, if applicable. **N N N**

LIABILITY: The Company and the Customer agree that the Company has no liability for indirect, special, incidental, or consequential loss or damages to the Customer, including but not limited to the Customer's operations, site, production output, or other claims by the Customer as a result of participation in this Rider. **N N N N**

BASELINE DEMAND(S): The Baseline Demand(s) is used to produce the Standard Bill and from which to measure changes in consumption for purposes of billing under the Thermal Market Energy Pricing Rider. It is specific to each Thermal Market Energy Pricing Rider Customer and is a representation of its typical pattern of electricity consumption. The Customer Baseline Demand(s) is designated through a Customer's ESA and allows the Company to curtail the participating Customer's load to an established Firm Demand. **N N N N N N**

The Customer's Baseline Demand(s) must be agreed to in writing by the Customer as a precondition of receiving service under this rider. **N N**

CUSTOMER CHARGE: A customer charge in the amount of $282.00 will be applied to each monthly bill to cover billing, administrative, metering, and communication costs associated with market pricing, plus any other applicable Tariff charges. **N N N**

DAY-AHEAD REQUIREMENTS: By 7:00 a.m. (Central Time) the preceding day, the Customer will provide the Company its expected hourly load for the next business day. The Customer's expected loads for Saturday through Monday will be provided to the Company by 7:00 a.m. the previous Friday. By 7:00 a.m. on the last business day preceding a holiday, the Customer will provide its expected hourly load for the holiday and the next business day for the following holidays: New Year's Day, Memorial Day, Independence Day, Labor Day, Veterans Day, Thanksgiving, Christmas Eve, and Christmas Day. **N N N N N N N**

No later than 4:00 p.m. (Central Time) of the preceding day, the Company shall give its best efforts to make available to Customers the Day-Ahead Thermal Market Energy prices for the next business day. The Day-Ahead Thermal Market Energy prices for Saturday through Monday will be made available, whenever possible, the previous Friday. The Company may deviate from this procedure in abnormal operating conditions and for the holidays mentioned above. **N N N N N**

The Company is not responsible for the Customer's failure to receive or obtain and act upon Day-Ahead Thermal Market Energy prices. If the Customer does not receive or obtain the prices made available by the Company, it is the Customer's responsibility to notify the Company by 4:30 p.m. of the business day preceding the day the prices are to take effect. The Company reserves the right to revise its Thermal Market Energy prices at any time prior to the Customer's acceptance and will be responsible for notifying the Customer of such revised prices. **N N N N N N**

Because high-outage-risk circumstances may prevent the Company from projecting prices more than one day in advance, the Company reserves the right to revise and make available to the Customer prices for Sunday, Monday, any of the holidays mentioned above, or for the day following a holiday. Any revised prices shall be made available by the usual means no later than 4:00 p.m. of the day prior to the prices taking effect. **N N N N N**

PRICING METHODOLOGY: The Day-Ahead Thermal Market Energy prices will be determined for each day based on hourly MISO LMP at the Customer's CP Node, Network Integration Transmission Service (NITS) costs, customer charge, and other MISO charges incurred by the Company caused by the Customer's load. **N N N N**

The Company is not responsible for providing the Real-Time Thermal Market Energy prices to the Customer. **N N**

BILL DETERMINATION: **N**

Energy: A Customer's monthly bill for Energy will be determined in two parts: (1) Energy consumed up to and including the Baseline Demand(s), and (2) Energy consumed above the Baseline Demand(s). **N N N**

The monthly bill for Energy consumed up to and including the Baseline Demand(s) will be determined by multiplying the Customer's metered Energy consumption by the Energy rate provided in the rate schedule applicable to the Customer. **N N N**

The monthly bill for Energy consumed above the Baseline Demand(s) will be determined by the MISO market settlements that occur at the Customer specific CP Node plus associated NITS charges and applicable riders. **N N N**

Demand: A Customer's monthly bill for Demand shall be determined by multiplying the Customer's Baseline Demand by the Demand rate provided in the Large General Service rate schedule applicable to the Customer. **N N N**

ESA Components: Incremental fixed and/or variable service costs to maintain net benefits as set in ESA. **N N**

PENALTY FOR INSUFFICIENT LOAD CONTROL: Upon notification from the Company, the Customer shall curtail its Demand to its Firm Demand. In the event the Customer fails to curtail its load as requested by the Company, the Customer shall be responsible for any and all costs and/or penalties incurred by the Company as a result of the Customers' failure to curtail. The duration and frequency of curtailments shall be at the sole discretion of the Company unless otherwise provided in the ESA between the Company and the Customer. **N N N N N N**

ENERGY ADJUSTMENT RIDER: Energy consumed up to and including the Baseline Demand(s) is subject to the Energy Adjustment Rider as provided in Section 13.01, or any amendments or superseding provisions applicable thereto. Because Energy consumed above the Baseline Demand(s) is subject to the Thermal Market Energy prices, it is not subject to the Energy Adjustment Rider as provided for in Mandatory Riders – Applicability Matrix, Section 13.00. **N N N N N N**

SPECIAL PROVISIONS: If there is a change in the legal identity of the Customer receiving service under this Thermal Market Energy Pricing Rider, service shall be terminated unless the Company and the Customer make other mutually agreeable arrangements. **N N N**

Attachment B
Redline and Clean Versions of Updated Electric Rate Schedules

Matrix / Tariffs	Mandatory Riders	Energy Adjustment Rider	Energy Conservation and Optimization (ECO) Rider	Competitive Rate to Large General Service Rider	Renewable Resource Cost Recovery Rider	Transmission Cost Recovery Rider	Reserved for Future Use	Uplift Program Rider	Environmental Cost Recovery Rider	Energy-Intensive, Trade-Exposed (EITE) Rider	Revenue Decoupling Mechanism (RDM) Rider	Electric Utility Infrastructure Cost Recovery (EUIC) Rider
Tariffs	Section Numbers	13.01	13.02	13.03	13.04	13.05	13.06	13.07	13.08	13.09	13.10	13.11
MANDATORY RIDERS												
Energy Adjustment Rider	13.01									✓		
Energy Conservation and Optimization (ECO) Rider	13.02									✓		
Competitive Rate to Large General Service Rider	13.03									✓		
Renewable Cost Recovery Rider	13.04									✓		
Transmission Cost Recovery Rider	13.05									✓		
Reserved for Future Use	13.06											
Uplift Program Rider	13.07											
Environmental Cost Recovery Rider	13.08									✓		
Energy-Intensive, Trade-Exposed (EITE) Rider	13.09											
Revenue Decoupling Mechanism (RDM) Rider	13.10											
Electric Utility Infrastructure Cost Recovery (EUIC) Rider	13.11											
VOLUNTARY RIDERS												
Water Heating Control Rider	14.01	■	✓		■	■			■	✓		■
Real Time Pricing Rider	14.02		■		■	■			■	✓		
Large General Service Rider	14.03	✓	■		■	■			■	✓		
Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	14.04	■	■		■	■			■	✓		■
Reserved for Future Use	14.05											
Controlled Service - Deferred Load Rider	14.06	■	■		■	■			■	✓		■
Fixed Time of Service Rider	14.07	■	■		■	■			■	✓		■
Air Conditioning Control Rider (**Cool** *Savings*)	14.08								■	✓		
Renewable Energy Rider (**Tail** ***Winds***)	14.09									✓		
WAPA Bill Crediting Program Rider	14.10								■			
Reserved for Future Use	14.11											
Off-Peak Electric Vehicle Rider	14.12	■	■		■	■			■	✓		■
Reserved for Future Use	14.13											
My Renewable Energy Credits (My RECs) Rider	14.14											
Thermal Market Energy Pricing Rider	14.16		✓							■		

Key: ✓ - May apply; ■ - Mandatory; □ - Not Applicable

6. The forecasted identifiable fuel costs associated with energy purchased for reasons other than in 2 and 3 above.

7. Less the forecasted fuel-related costs recovered through intersystem sales.

8. Less a credit for forecasted asset-based margins: forecasted revenues minus costs from asset-based wholesale energy and MISO ancillary services market ("ASM") transactions (excluding ancillary services net revenues derived through OTP's FERC-approved Control Area Services Operations Tariff) shall be credited to the cost of energy. The forecasted revenues for this calculation are those received from forecasted sales of excess generation; the forecasted costs are the fuel costs (as defined in FERC Account 501) and energy costs (including MISO costs that are booked to FERC Account 555) and any forecasted transmission costs incurred that are required to make such sales.

9. The forecasted costs of reagents for the Company to operate its generating plants in compliance with Federal Environmental Protection Agency rules and regulations.

10. The forecasted costs of fuel and reagents resulting from steam and water sales.

11. The proceeds from the forecasted revenues from steam and water sales shall be credited to (flow through) the energy adjustment rider.

12. Less a credit to provide Minnesota customers the full amount of avoided purchased power costs associated with 100 percent of the Hoot Lake Solar plant output.

13. Known MISO Planning Resource Auction capacity costs will be added to the energy adjustment rider or revenues will be credited (flow through) the energy adjustment rider.

14. Excluding any Market Energy related costs under Section 14.16.

Service Category	Section	Rate per kWh
Residential	9.01, 9.02	0.545 ¢kWh
Farm	9.03	0.558 ¢kWh
General Service	10.01, 10.02, 10.03, 10.07	0.540 ¢kWh
Large General Service	10.04, 10.05, 10.06, 14.02, 14.03, 14.16	0.578 ¢kWh
Irrigation Service	11.02	0.304 ¢kWh
Outdoor Lighting	11.03, 11.04, 11.07	0.613 ¢kWh
OPA	11.05	0.487 ¢kWh
Controlled Service Deferred	14.01, 14.06	0.534 ¢kWh
Controlled Service Interruptible	14.04	0.561 ¢kWh
Controlled Service Off Peak	14.07, 14.12	0.453 ¢kWh

DETERMINATION OF CONSERVATION SURCHARGE RATES: The Minnesota Public Utilities Commission (MNPUC) annually approves a Conservation Cost Recovery Adjustment (CCRA) which is used to develop the Conservation Surcharge for each Service Category. The approved CCRA is $0.00555. The Conservation Surcharge shall be the Recoverable ECO Tracker Balance multiplied by the Service Category's ECO energy allocator (E2), divided by the corresponding Service Category's projected Minnesota non-exempt retail energy sales for a designated 12-month recovery period. The Surcharge may be adjusted annually by approval of a change in the CCRA by the MNPUC. The Recoverable ECO Tracker Balance is determined as described below, starting with the MNPUC accepted ECO Tracker account balance as of the end of the prior year. From this starting point:

1. Add financial incentives awarded by the MNPUC not reflected in the prior year-end ECO Tracker balance;

2. Add current year ECO approved spending levels.

All costs appropriately charged to the ECO Tracker account shall be eligible for recovery through this Rider and all revenues received from the application of the Conservation Surcharge Factor shall be credited to the ECO Tracker account.

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

ENVIRONMENTAL COST RECOVERY RIDER

DESCRIPTION	RATE CODE
Environmental Cost Recovery Rider	MECR

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

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's retail rate schedules in Sections 9, 10, 11, 12 and 14, except for Sections 14.09 (TailWinds) and 14.16 (Thermal Market Energy Pricing).

COST RECOVERY FACTOR: There shall be included on each Minnesota Customer's monthly bill an Environmental Cost Recovery ("ECR") charge based on the applicable cost recovery factor multiplied by the Customer's monthly bill. The Customer's monthly bill shall be based on all applicable charges and credits under the Company's retail rate schedules in Sections 9, 10, 11, 12 and 14, except for Sections 14.09 (TailWinds) and 14.16 (Thermal Market Energy Pricing). The Environmental Cost Recovery Charge will not apply to any Mandatory Riders or sales tax and any local assessments as provided in the General Rules and Regulations for the Company's electric service. The Environmental Cost Recovery charge will be included in the Resource Adjustment line item on the Customer's bill.

The Environmental Cost Recovery Factor is (0.0) percent.

DETERMINATION OF ECR ADJUSTMENT FACTOR: An ECR Adjustment Factor shall be determined by dividing the forecasted balance of the ECR Tracker account by the forecasted retail revenue for the upcoming year (or such other period as may be approved by the Minnesota Public Utilities Commission ("Commission")). The ECR Adjustment Factor shall be rounded to the nearest 0.001%. The ECR Adjustment Factor may be adjusted annually (or other approved periods) with approval of the Commission.

Recoverable Environmental Measures Costs shall be the annual revenue requirements associated with environmental measures eligible for recovery under MN Statute 216B.1692 that are determined by the Commission to be eligible for recovery under this ECR Rider. A standard model will be used to calculate the total forecasted revenue requirements for eligible measures for the designated period. All costs appropriately charged to the ECR Tracker account shall be eligible for recovery through this Rider, and all revenues recovered from the ECR Adjustment shall be credited to the ECR Tracker account.

ELECTRIC UTILITY INFRASTRUCTURE COST (EUIC) RECOVERY RIDER

DESCRIPTION	RATE CODE
Residential	MEURS
Residential RDC	MEURC
Farm	MEUFM
Small General Service (Under 20 kW)	MEUGS
General Service (20 kW or Greater)	MEUG1
General Service TOU	MEUGU
Large General Service – Primary / Transmission	MEULP
Large General Service – Secondary	MEULS
Irrigation Service	MEUIR
Outdoor Lighting (Metered)	MEULT
OPA (Metered)	MEUOP
Controlled Service Deferred Load	MEUCD
Controlled Service Interruptible Self Contained	MEUCS
Controlled Service Interruptible CT Metering	MEUCT
Controlled Service Off Peak	MEUCO

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

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's metered retail rate schedules excluding any Market Energy related costs under Section 14.16.

COST RECOVERY CHARGE: There shall be included on each Minnesota Customer's monthly bill an Electric Utility Infrastructure Cost (EUIC) Recovery per meter 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. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

VOLUNTARY RIDERS - AVAILABILITY MATRIX

(Rate Schedules listed across the top in the first row are applicable to the Rate Schedules in the first column on the left.)

The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply, by any Voluntary Rate Riders selected by the Customer, and charges listed in the General Rules and Regulations.

Availability Matrix	Voluntary Riders	Water Heating Control Rider	Real Time Pricing Rider	Large General Service Rider	Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	Reserved for Future Use	Controlled Service - Deferred Load Rider	Fixed Time of Service Rider	Air Conditioning Control Rider (Cool Savings)	Renewable Energy Rider (Tail Winds)	WAPA Bill Crediting Program Rider	Reserved for Future Use	Off-Peak Electric Vehicle Rider	Reserved for Future Use	My Renewable Energy Credits (My RECs) Rider	Thermal Market Energy Pricing Rider
Base Tariffs	Section Numbers	14.01	14.02	14.03	14.04	14.05	14.06	14.07	14.08	14.09	14.10	14.11	14.12	14.13	14.14	14.16
RESIDENTIAL & FARM SERVICES																
Residential Service	9.01	✓			✓		✓	✓	✓	✓	✓		✓			
Residential Demand Control Service	9.02	✓							✓	✓	✓		✓			
Farm Service	9.03	✓			✓		✓	✓	✓	✓	✓		✓		✓	
GENERAL SERVICES																
Small General Service (Under 20 kW)	10.01	✓			✓		✓	✓	✓	✓	✓		✓		✓	
General Service (20 kW or Greater)	10.02	✓	✓		✓		✓	✓	✓	✓	✓		✓		✓	
General Service - Time of Use	10.03	✓	✓							✓	✓		✓		✓	
Large General Service	10.04	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓	✓
Large General Service - Time of Day	10.05	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓	✓
Super Large General Service	10.06	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓	
Electric Vehicle Direct Current Fast Charging (DCFC) General Service - Time of Day	10.07									✓					✓	
OTHER SERVICES																
Standby Service	11.01														✓	
Irrigation Service	11.02										✓				✓	
Outdoor Lighting - Energy Only Dusk to Dawn	11.03										✓				✓	
Outdoor Lighting - Dusk to Dawn (CLOSED)	11.04										✓					
Municipal Pumping Service	11.05	✓	✓		✓		✓	✓		✓	✓		✓		✓	
Civil Defense - Fire Sirens	11.06														✓	
LED Street and Area Lighting	11.07										✓				✓	
Key:	✓ - May apply	■ - Mandatory	□ - Not Applicable													

VOLUNTARY RIDERS - AVAILABILITY MATRIX

(Rate Schedules listed across the top in the first row are applicable to the Rate Schedules in the first column on the left.)

Availability Matrix	Voluntary Riders	Water Heating Control Rider	Real Time Pricing Rider	Large General Service Rider	Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	Reserved for Future Use	Controlled Service - Deferred Load Rider	Fixed Time of Service Rider	Air Conditioning Control Rider (Cool *Savings*)	Renewable Energy Rider (Tail *Winds*)	WAPA Bill Crediting Program Rider	Reserved for Future Use	Off-Peak Electric Vehicle Rider	Reserved for Future Use	My Renewable Energy Credits (My RECs) Rider	Thermal Market Energy Pricing Rider
Riders	Section Numbers	14.01	14.02	14.03	14.04	14.05	14.06	14.07	14.08	14.09	14.10	14.11	14.12	14.13	14.14	14.16
VOLUNTARY RIDERS																
Water Heating Control Rider	14.01									✓					✓	
Real Time Pricing Rider	14.02									✓					✓	
Large General Service Rider	14.03									✓					✓	
Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	14.04									✓					✓	
Reserved for Future Use	14.05															
Controlled Service - Deferred Load Rider	14.06									✓					✓	
Fixed Time of Service Rider	14.07									✓					✓	
Air Conditioning Control Rider (Cool *Savings*)	14.08															
Renewable Energy Rider (Tail *Winds*)	14.09															
WAPA Bill Crediting Program Rider	14.10															
Reserved for Future Use	14.11															
Off-Peak Electric Vehicle Rider	14.12									✓					✓	
Reserved for Future Use	14.13															
My Renewable Energy Credits (My RECs) Rider	14.14															
Thermal Market Energy Pricing Rider	14.16															
Key:	✓ - May apply	■ - Mandatory	□ - Not Applicable													

Applicability Matrix	Mandatory Riders	Energy Adjustment Rider	Energy Conservation and Optimization (ECO) Rider	Competitive Rate to Large General Service Rider	Renewable Resource Cost Recovery Rider	Transmission Cost Recovery Rider	Reserved for Future Use	Uplift Program Rider	Environmental Cost Recovery Rider	Energy-Intensive, Trade-Exposed (EITE) Rider	Revenue Decoupling Mechanism (RDM) Rider	Electric Utility Infrastructure Cost Recovery (EUIC) Rider
Tariffs	Section Number	13.01	13.02	13.03	13.04	13.05	13.06	13.07	13.08	13.09	13.10	13.11
MANDATORY RIDERS												
Energy Adjustment Rider	13.01									✓		
Energy Conservation and Optimization (ECO) Rider	13.02									✓		
Competitive Rate to Large General Service Rider	13.03									✓		
Renewable Cost Recovery Rider	13.04									✓		
Transmission Cost Recovery Rider	13.05									✓		
Reserved for Future Use	13.06											
Uplift Program Rider	13.07											
Environmental Cost Recovery Rider	13.08									✓		
Energy-Intensive, Trade-Exposed (EITE) Rider	13.09											
Revenue Decoupling Mechanism (RDM) Rider	13.10											
Electric Utility Infrastructure Cost Recovery (EUIC) Rider	13.11											
VOLUNTARY RIDERS												
Water Heating Control Rider	14.01	■	✓		■	■			■	✓		■
Real Time Pricing Rider	14.02		■		■	■			■	✓		
Large General Service Rider	14.03	✓	■		■	■			■	✓		
Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	14.04	■	■		■	■			■	✓		■
Reserved for Future Use	14.05											
Controlled Service - Deferred Load Rider	14.06	■	■		■	■			■	✓		■
Fixed Time of Service Rider	14.07	■	■		■	■			■	✓		■
Air Conditioning Control Rider (**Cool** *Savings*)	14.08								■	✓		
Renewable Energy Rider (**Tail** *Winds*)	14.09									✓		
WAPA Bill Crediting Program Rider	14.10								■			
Reserved for Future Use	14.11											
Off-Peak Electric Vehicle Rider	14.12	■	■		■	■			■	✓		■
Reserved for Future Use	14.13											
My Renewable Energy Credits (My RECs) Rider	14.14											
Thermal Market Energy Pricing Rider	14.16		✓							■		

Key: ✓ - May apply ■ - Mandatory □ - Not Applicable

N

6. The forecasted identifiable fuel costs associated with energy purchased for reasons other than in 2 and 3 above.

7. Less the forecasted fuel-related costs recovered through intersystem sales.

8. Less a credit for forecasted asset-based margins: forecasted revenues minus costs from asset-based wholesale energy and MISO ancillary services market ("ASM") transactions (excluding ancillary services net revenues derived through OTP's FERC-approved Control Area Services Operations Tariff) shall be credited to the cost of energy. The forecasted revenues for this calculation are those received from forecasted sales of excess generation; the forecasted costs are the fuel costs (as defined in FERC Account 501) and energy costs (including MISO costs that are booked to FERC Account 555) and any forecasted transmission costs incurred that are required to make such sales.

9. The forecasted costs of reagents for the Company to operate its generating plants in compliance with Federal Environmental Protection Agency rules and regulations.

10. The forecasted costs of fuel and reagents resulting from steam and water sales.

11. The proceeds from the forecasted revenues from steam and water sales shall be credited to (flow through) the energy adjustment rider.

12. Less a credit to provide Minnesota customers the full amount of avoided purchased power costs associated with 100 percent of the Hoot Lake Solar plant output.

13. Known MISO Planning Resource Auction capacity costs will be added to the energy adjustment rider or revenues will be credited (flow through) the energy adjustment rider.

14. Excluding any Market Energy related costs under Section 14.16. **N**

Service Category	Section	Rate per kWh
Residential	9.01, 9.02	0.545 ¢kWh
Farm	9.03	0.558 ¢kWh
General Service	10.01, 10.02, 10.03, 10.07	0.540 ¢kWh
Large General Service	10.04, 10.05, 10.06, 14.02, 14.03, 14.16	0.578 ¢kWh
Irrigation Service	11.02	0.304 ¢kWh
Outdoor Lighting	11.03, 11.04, 11.07	0.613 ¢kWh
OPA	11.05	0.487 ¢kWh
Controlled Service Deferred	14.01, 14.06	0.534 ¢kWh
Controlled Service Interruptible	14.04	0.561 ¢kWh
Controlled Service Off Peak	14.07, 14.12	0.453 ¢kWh

C

DETERMINATION OF CONSERVATION SURCHARGE RATES: The Minnesota Public Utilities Commission (MNPUC) annually approves a Conservation Cost Recovery Adjustment (CCRA) which is used to develop the Conservation Surcharge for each Service Category. The approved CCRA is $0.00555. The Conservation Surcharge shall be the Recoverable ECO Tracker Balance multiplied by the Service Category's ECO energy allocator (E2), divided by the corresponding Service Category's projected Minnesota non-exempt retail energy sales for a designated 12-month recovery period. The Surcharge may be adjusted annually by approval of a change in the CCRA by the MNPUC. The Recoverable ECO Tracker Balance is determined as described below, starting with the MNPUC accepted ECO Tracker account balance as of the end of the prior year. From this starting point:

1. Add financial incentives awarded by the MNPUC not reflected in the prior year-end ECO Tracker balance;

2. Add current year ECO approved spending levels.

All costs appropriately charged to the ECO Tracker account shall be eligible for recovery through this Rider and all revenues received from the application of the Conservation Surcharge Factor shall be credited to the ECO Tracker account.

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

ENVIRONMENTAL COST RECOVERY RIDER

DESCRIPTION	RATE CODE
Environmental Cost Recovery Rider	MECR

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

APPLICATION OF RIDER: This rider is applicable to electric service under all of the
Company's retail rate schedules in Sections 9, 10, 11, 12 and 14, except for Sections 14.09 **C**
(TailWinds) and 14.16 (Thermal Market Energy Pricing). **N**

COST RECOVERY FACTOR: There shall be included on each Minnesota Customer's monthly bill an Environmental Cost Recovery ("ECR") charge based on the applicable cost recovery factor multiplied by the Customer's monthly bill. The Customer's monthly bill shall be based on all applicable charges and credits under the Company's retail rate schedules in
Sections 9, 10, 11, 12 and 14, except for Sections 14.09 (TailWinds) and 14.16 (Thermal **CN**
Market Energy Pricing). The Environmental Cost Recovery Charge will not apply to any **N**
Mandatory Riders or sales tax and any local assessments as provided in the General Rules and Regulations for the Company's electric service. The Environmental Cost Recovery charge will be included in the Resource Adjustment line item on the Customer's bill.

The Environmental Cost Recovery Factor is (0.0) percent.

DETERMINATION OF ECR ADJUSTMENT FACTOR: An ECR Adjustment Factor shall be determined by dividing the forecasted balance of the ECR Tracker account by the forecasted retail revenue for the upcoming year (or such other period as may be approved by the Minnesota Public Utilities Commission ("Commission")). The ECR Adjustment Factor shall be rounded to the nearest 0.001%. The ECR Adjustment Factor may be adjusted annually (or other approved periods) with approval of the Commission.

Recoverable Environmental Measures Costs shall be the annual revenue requirements associated with environmental measures eligible for recovery under MN Statute 216B.1692 that are determined by the Commission to be eligible for recovery under this ECR Rider. A standard model will be used to calculate the total forecasted revenue requirements for eligible measures for the designated period. All costs appropriately charged to the ECR Tracker account shall be eligible for recovery through this Rider, and all revenues recovered from the ECR Adjustment shall be credited to the ECR Tracker account.

ELECTRIC UTILITY INFRASTRUCTURE COST (EUIC) RECOVERY RIDER

DESCRIPTION	RATE CODE
Residential	MEURS
Residential RDC	MEURC
Farm	MEUFM
Small General Service (Under 20 kW)	MEUGS
General Service (20 kW or Greater)	MEUG1
General Service TOU	MEUGU
Large General Service – Primary / Transmission	MEULP
Large General Service – Secondary	MEULS
Irrigation Service	MEUIR
Outdoor Lighting (Metered)	MEULT
OPA (Metered)	MEUOP
Controlled Service Deferred Load	MEUCD
Controlled Service Interruptible Self Contained	MEUCS
Controlled Service Interruptible CT Metering	MEUCT
Controlled Service Off Peak	MEUCO

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

APPLICATION OF RIDER: This rider is applicable to electric service under all of the
Company's metered retail rate schedules excluding any Market Energy related costs under **N**
Section 14.16. **N**

COST RECOVERY CHARGE: There shall be included on each Minnesota Customer's monthly bill an Electric Utility Infrastructure Cost (EUIC) Recovery per meter 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. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

VOLUNTARY RIDERS - AVAILABILITY MATRIX

(Rate Schedules listed across the top in the first row are applicable to the Rate Schedules in the first column on the left.)

The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply, by any Voluntary Rate Riders selected by the Customer, and charges listed in the General Rules and Regulations.

Availability Matrix	Voluntary Riders	Water Heating Control Rider	Real Time Pricing Rider	Large General Service Rider	Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	Reserved for Future Use	Controlled Service - Deferred Load Rider	Fixed Time of Service Rider	Air Conditioning Control Rider (Cool Savings)	Renewable Energy Rider (Tail Winds)	WAPA Bill Crediting Program Rider	Reserved for Future Use	Off-Peak Electric Vehicle Rider	Reserved for Future Use	My Renewable Energy Credits (My RECs) Rider	Thermal Market Energy Pricing Rider	N
Base Tariffs	Section Numbers	14.01	14.02	14.03	14.04	14.05	14.06	14.07	14.08	14.09	14.10	14.11	14.12	14.13	14.14	14.16	N
RESIDENTIAL & FARM SERVICES																	
Residential Service	9.01	✓			✓		✓	✓	✓	✓	✓		✓				
Residential Demand Control Service	9.02	✓							✓	✓	✓		✓				
Farm Service	9.03	✓			✓		✓	✓	✓	✓	✓		✓		✓		
GENERAL SERVICES																	
Small General Service (Under 20 kW)	10.01	✓			✓		✓	✓	✓	✓	✓		✓		✓		
General Service (20 kW or Greater)	10.02	✓	✓		✓		✓	✓	✓	✓	✓		✓		✓		
General Service - Time of Use	10.03	✓	✓							✓	✓		✓		✓		
Large General Service	10.04	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓	✓	N
Large General Service - Time of Day	10.05	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓	✓	N
Super Large General Service	10.06	✓	✓	✓	✓		✓	✓		✓	✓		✓		✓		
Electric Vehicle Direct Current Fast Charging (DCFC) General Service - Time of Day	10.07									✓					✓		
OTHER SERVICES																	
Standby Service	11.01														✓		
Irrigation Service	11.02										✓				✓		
Outdoor Lighting - Energy Only - Dusk to Dawn	11.03										✓				✓		
Outdoor Lighting - Dusk to Dawn (CLOSED)	11.04										✓						
Municipal Pumping Service	11.05	✓	✓		✓		✓	✓		✓	✓		✓		✓		
Civil Defense - Fire Sirens	11.06														✓		
LED Street and Area Lighting	11.07										✓				✓		
Key:	✓ - May apply	■ - Mandatory	☐ - Not Applicable														

VOLUNTARY RIDERS - AVAILABILITY MATRIX

(Rate Schedules listed across the top in the first row are applicable to the Rate Schedules in the first column on the left.)

Availability Matrix	Voluntary Riders	Water Heating Control Rider	Real Time Pricing Rider	Large General Service Rider	Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	Reserved for Future Use	Controlled Service - Deferred Load Rider	Fixed Time of Service Rider	Air Conditioning Control Rider (**Cool** *Savings*)	Renewable Energy Rider (**Tail** *Winds*)	WAPA Bill Crediting Program Rider	Reserved for Future Use	Off-Peak Electric Vehicle Rider	Reserved for Future Use	My Renewable Energy Credits (My RECs) Rider	Thermal Market Energy Pricing Rider	N
Riders	Section Numbers	14.01	14.02	14.03	14.04	14.05	14.06	14.07	14.08	14.09	14.10	14.11	14.12	14.13	14.14	14.16	N
VOLUNTARY RIDERS																	
Water Heating Control Rider	14.01									✓					✓		
Real Time Pricing Rider	14.02									✓					✓		
Large General Service Rider	14.03									✓					✓		
Controlled Service - Interruptible Load Self-Contained and CT Metering Rider	14.04									✓					✓		
Reserved for Future Use	14.05																
Controlled Service - Deferred Load Rider	14.06									✓					✓		
Fixed Time of Service Rider	14.07									✓					✓		
Air Conditioning Control Rider (**Cool** *Savings*)	14.08																
Renewable Energy Rider (**Tail** *Winds*)	14.09																
WAPA Bill Crediting Program Rider	14.10																
Reserved for Future Use	14.11																
Off-Peak Electric Vehicle Rider	14.12									✓					✓		
Reserved for Future Use	14.13																
My Renewable Energy Credits (My RECs) Rider	14.14																
Thermal Market Energy Pricing Rider	14.16																N
Key:	✓ - May apply	■ - Mandatory	□ - Not Applicable														

Attachment C

Thermal Market Energy Pricing Rider

Customer Notice

Customer notice

The Minnesota Public Utilities Commission approved our request for a new Thermal Market Energy Pricing Rider and associated updates to our Index, Matrices, and Rider Rate Schedules, effective January 1, 2026, which are available at otpco.com/pricing.

This voluntary rider allows certain large general service customers using thermal storage tied to a renewable generation resource not owned by Otter Tail Power to pay market rates for energy on an hourly basis. They'll also pay all costs charged by the Midcontinent Independent System Operator (MISO) directly rather than as part of the Energy Adjustment Rider, so long as they are registered as a MISO load modifying resource and meet other rider requirements. This rider doesn't affect any other rates or customers.

For more information, contact us at 800-257-4044 or visit otpco.com.

CERTIFICATE OF SERVICE

RE: **In the Matter of Otter Tail Power Company's Petition for Approval of a Thermal Technology Market Energy Rate Section 14.16**
Docket No. E017/M-25-
Initial Filing

I, Valerie Moxness, 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 **6th** day of June**, 2024.**

/S/ VALERIE MOXNESS

Valerie Moxness
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8346

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	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 Thermal Market Energy Pricing
2	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 Thermal Market Energy Pricing
3	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 Thermal Market Energy Pricing
4	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 Thermal Market Energy Pricing
5	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 Thermal Market Energy Pricing
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Otter Tail Power Company Thermal Market Energy Pricing
7	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 Thermal Market Energy Pricing
8	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 Thermal Market Energy Pricing
9	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 Thermal Market Energy Pricing
10	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 Thermal Market Energy Pricing

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	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 Thermal Market Energy Pricing
12	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 Thermal Market Energy Pricing
13	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 Thermal Market Energy Pricing
14	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company Thermal Market Energy Pricing
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 Thermal Market Energy Pricing
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 Thermal Market Energy Pricing