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August 13, 2025



Mike Bull
Acting 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 Petition for Approval of the Annual Rate Update to its Transmission Cost Recovery Rider Annual Adjustment, Rate Schedule 13.05
Docket No. E017/M-24-204
Letter – OTP Reply to the Department of Commerce July 29, 2025 Response Letter**

Dear Mr. Bull:

Otter Tail Power Company (Otter Tail Power or the Company) submits to the Minnesota Public Utilities Commission (Commission) this letter responding to the July 29, 2025 Response Letter from the Minnesota Department of Commerce (Department). This letter confirms that Otter Tail Power agrees with the Department's prior recommendation that the Commission approve the Company's request with the following modifications:

- a. establish a TCRR cap of \$36.4 million (OTP Total)/\$18.1 million (OTP MN) for the Milbank Area Reliability Project;
- b. limit Otter Tail Power's proposed recovery for the Oslo 115 kV Breaker Station and Oslo – Lake Ardoch 115kV in this proceeding to the initial amount escalated for inflation or \$8.69 million (OTP Total) in 2024 dollars, with the opportunity for the Company to seek recovery of excluded costs on a prospective basis in a subsequent rate case; and
- c. require Otter Tail Power to include the additional Attachment O revenues, which decreases the revenue requirement by \$225,870.¹

Given the parties' alignment on these issues, Otter Tail Power respectfully requests the Commission set this matter for rehearing as soon as reasonably possible. The following briefly summarizes these issues.

As noted by the Department, the matter was brought before the Commission for hearing on May 21, 2025. The Commission deferred action on the Petition to permit Otter Tail Power to provide more information about the need for the Milbank Area Reliability Project, which the Company provided in a July 3, 2025 supplemental filing. Otter Tail Power appreciates the Department's review of the supplemental information and the Department's conclusion that the Company provided the

¹ Department of Commerce Comments, September 19, 2024.
An Equal Opportunity Employer

information requested by the Commission, that the need for Milbank Reliability Project existed before factoring in the new load growth from the existing agricultural customer, and that the broad benefits provided by the project made it reasonable to not directly assign costs of the project to the existing agricultural customer. Otter Tail Power therefore reaffirms its agreement with the Department's recommendation to establish a TCR cap of \$36.4 million (OTP Total)/\$18.1 million (OTP MN) for the Milbank Area Reliability Project.

Otter Tail Power also supports the Department's recommendation to limit cost recovery for the Oslo – Lake Ardoch Breaker Station and Oslo – Lake Ardoch 114kV project to the initial project estimate, adjusted for inflation or \$8.69 (OTP Total) in 2024 dollars, with the opportunity for the Company to seek recovery of excluded costs on a prospective basis in a subsequent rate case. In Reply Comments the Company had contested this issue,² but that is no longer the case. Otter Tail Power's Revised Attachment 13 excludes costs exceeding the cap for the Oslo – Lake Ardoch project, resulting in a \$126,271 reduction to the revenue requirement.

Finally, the Company agrees with the Department's recommendation to include the additional Attachment O revenues, which decreases the revenue requirement by \$225,870.³ Revised Attachments 1-5 reflect the removal of MISO Schedules 7, 8, and 9 true-up, resulting in an increase to the revenue requirement of \$279,568. Conversely, the inclusion of the wholesale revenue credit reduces the revenue requirement by \$225,870, yielding a net increase of approximately \$53,698.

Incorporation of the Department's recommendations results in a total net reduction of \$72,573 when compared to the proposed revenue requirement in the Company's Reply Comments dated October 10, 2024. Otter Tail Power's Initial Filing indicated that a residential customer using 1,000 kWh per month would see a proposed monthly increase of \$1.41. With these revisions, that same customer will instead see an increase of \$1.22 per month.

A Certificate of Service is enclosed. Otter Tail Power has served a copy of this filing on all parties listed on the enclosed Service List.

Please contact me at 218-739-8444 or dhaugen@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ *DEREK HAUGEN*

Derek Haugen
Rates Analyst

vjm
Enclosures
By electronic filing
c: Service List

² Otter Tail Power Reply Comments, October 10, 2024, pg. 2-3.

³ Otter Tail Power had initially proposed to discontinue the application of the wholesale revenue credit for projects not recovered through Attachments GG or MM and to instead provide a true-up calculation for MISO Schedules 7, 8, and 9 revenues. Otter Tail Power Reply Comments, October 10, 2024, pg. 3-4. Otter Tail Power withdraws this proposal.

Projected Revenue for January through December 2025 Recovery Period

Line No.	Class	Units	Rate per Unit	Amount
1	Large General Service	(a) 2,704,849 kW	\$0.529	\$1,431,355
2				
3	Controlled Service	(b) 150,563,474 kWh	0.027¢	\$39,982
4				
5	Lighting	(c) 9,100,065 kWh	0.121¢	\$11,030
6				
7	All other service	840,645,620 kWh	0.152¢	\$1,275,011
8				
9	Total revenue			\$2,757,378

- (a) Rate Schedules 10.04 Large General Service, 10.05 Large General Service - Time of Day, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider
- (b) Rate Schedules 14.01 Water Heating, 14.04 Interruptible Load (CT Metering), 14.06 Deferred Load, 14.07 Fixed Time of Service and 14.12 Off-Peak Electric Vehicle Rider
- (c) Rate Schedules 11.03 Outdoor Lighting (energy only), 11.04 Outdoor Lighting and 11.07 LED Street and Area Lighting Dusk to Dawn

Summary of Revenue Requirements

Line No.	Revenue Requirements	January - December 2025
1	Erie Substation	308,206
2	Hoot Lake Transformer	55,864
3	Oslo Lake Ardoch	352,617
4	Milbank Area Reliability	779,629
5		
6	Schedule 26 Expense	5,532,506
7	Schedule 26A Expense	4,462,994
8		
9	Schedule 26 Revenue	(6,509,035)
10	Schedule 37 & 38 Revenue	(141,171)
11	Schedule 26A Revenue	(1,525,526)
12	MVP ARR Revenue	(6,825)
13		
14	True-Up	(551,881)
15		
16	Net Revenue Requirement	<u>\$2,757,378</u>

Class Allocation and Current Rate Design

Line No.		January - December 2025
1	Total Minnesota Revenue Requirements	\$2,757,378
2		
3	Large General Service 51.91%	\$1,431,355
4	Controlled Service 1.45%	\$39,982
5	Lighting 0.40%	\$11,030
6	All Other Service 46.24%	\$1,275,011
7		
8	Total	\$2,757,378
9		
10		
11	Large General Service kW	2,704,849
12		
13	Controlled Service kWh	150,563,474
14	Lighting kWh	9,100,065
15	All Other Service kWh	840,645,620
16		
17		
18	Large General Service \$ / kW	0.529
19		
20	Controlled Service cents / kWh	0.027
21	Lighting cents / kWh	0.121
22	All Other Service cents / kWh	0.152

* Jurisdictional transmission allocation factor (D2 = 49.814%) is from Otter Tail's most recent general rate case in Minnesota (E017-GR-20-719).

Percent of Revenue Rate Design per Order Item 6 in Docket No. E017/M-10-1061							
23	Forecasted Minnesota Retail Revenues (January 2025 - December 2025)	\$	146,791,296				
24	Revenue Requirement		\$2,757,378				
25	Percent of revenue rate for MN TCRR		1.878%				
		A	B	D	E	F	G
		Forecast Base Revenue January 2025- December 2025	Meters/Fixtures	Average TCR Revenue per Customer Per Month from % Base Revenue (1)	Avg kW per month	Avg kWh per month	Average TCR Revenue per Customer Per Month per Current Rate Design (2)
26	Large General Service	\$71,751,466	441	\$254.59	511		\$270.41
27	Controlled Service	\$5,619,702	14,659	\$0.60		856	\$0.23
28	Lighting	\$2,549,372	20,178	\$0.20		38	\$0.05
29	All Other Service	<u>\$66,870,755</u>	62,843	\$1.67		1,115	\$1.69
30	Total	\$146,791,296					
(1) Percent of Revenue Rate of 1.878% X Average Monthly Customer Bill in Column C (2) Corresponding Proposed rate from Current Rate Design X average kW (Column E) or average kWh (Column F)							

Line No.	TRACKER SUMMARY Requirements Compared to Billed:	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024
		January	February	March	April	May	June	July	August	September	October	November	December
		Actual	Actual	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected	Projected
1	Revenue Requirements												
2	Erie Substation	20,419	20,432	20,432	24,891	24,707	24,707	24,707	24,707	24,707	24,707	24,707	24,707
3	Hoot Lake Transformer	3,837	3,837	3,837	4,557	4,557	4,557	4,557	4,557	4,557	4,557	4,557	4,557
4	Oslo Lake Ardoch	23,125	23,125	23,125	23,125	23,125	23,125	23,125	23,125	23,125	23,125	23,125	23,125
5	Milbank Area Reliability	0	0	0	0	0	0	0	0	0	0	0	0
6	Total Revenue Requirements	47,380	47,394	47,394	52,573	52,388	52,388	52,388	52,388	52,388	52,388	52,388	52,388
7	Preservation of ADIT Proration	(135)	(135)	(135)	(135)	(135)	(135)	(135)	(135)	(135)	(135)	(135)	(135)
8													
9	MISO Expenses												
10	MISO Schedule 26 Expense	540,616	461,618	498,263	419,885	369,499	442,279	453,476	453,476	391,892	464,672	464,672	559,846
11	MISO Schedule 26A Expense	478,408	426,197	390,547	337,714	326,783	323,626	340,811	336,825	318,532	338,735	378,822	423,193
12	Total MISO Expenses	1,019,023	887,814	888,810	757,599	696,281	765,905	794,287	790,301	710,424	803,407	843,494	983,039
13													
14	MISO Revenues												
15	MISO Schedule 26 Revenue	(566,187)	(500,411)	(475,377)	(440,862)	(530,603)	(641,053)	(682,472)	(696,279)	(572,022)	(475,377)	(468,474)	(537,506)
16	MISO Schedule 37 & 38 Revenue	(12,139)	(12,139)	(10,166)	(9,428)	(11,347)	(13,709)	(14,595)	(14,890)	(12,233)	(10,166)	(10,019)	(11,495)
17	MISO Schedule 26A Revenue	(134,845)	(118,274)	(133,758)	(116,865)	(119,936)	(146,045)	(167,546)	(158,331)	(132,223)	(129,151)	(112,257)	(146,045)
18	MISO MVP ARR Revenue	(17,959)	(17,490)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)
19	Total MISO Revenues	(731,130)	(648,313)	(619,871)	(567,723)	(662,455)	(801,376)	(865,182)	(870,069)	(717,046)	(615,264)	(591,319)	(695,614)
20													
21	Net Revenue Requirement	335,139	286,760	316,198	242,313	86,080	16,782	(18,642)	(27,515)	45,631	240,397	304,428	339,678
22													
23	Billed (forecast kWh x adj factor)	436,595	419,772	50,504	42,177	42,414	42,609	44,866	43,609	41,437	43,546	48,795	54,774
24													
25	Monthly Revenue Difference	(101,456)	(133,012)	265,694	200,136	43,666	(25,827)	(63,508)	(71,124)	4,194	196,851	255,633	284,904
26	Carrying Charge	10	0	0	0	0	0	0	0	0	0	0	0
27	Life-to-Date Revenue Requirement (Cumulative Difference)	(1,509,489)	(1,642,501)	(1,376,807)	(1,176,671)	(1,133,005)	(1,158,832)	(1,222,340)	(1,293,463)	(1,289,269)	(1,092,418)	(836,785)	(551,881)
28													
29	BSAT Portion of Tracker Balance												
30	Monthly Change in BSAT Portion of Tracker ¹												
31	BSAT Portion of Tracker Balance ²												
32	Carrying Charge ³												
33	Cumulative Carrying Charge												
34	Carrying cost ⁴												
35													
36													
37	Forecasted Sales (MWh)	255,609	236,410	244,211	203,946	205,091	206,032	216,947	210,868	200,367	210,563	235,948	264,858
38													
39	BSAT Portion of Tracker Balance (%) ⁵												

¹ Line No. 23 x Line No. 39
² Previous Month Line No. 31 - Current Month Line No. 30
³ Commission's November 10, 2020 Order Point 7 in Docket No. E017/M-18-748
⁴ November 2020 is 20 / 30 of the Short Term-Debt Rate
⁵ Line No. 31/ Line No. 27

SUMMARY	Jan 2024 - Dec 2024
Revenue requirements	\$1,903,930
True-up	(1,359,351)
Total requirements	\$544,578
Jan 2024 - Dec 2024 projected sales	2,633,282
Average Rate	\$0.00021

Line No.		2025 January Projected	2025 February Projected	2025 March Projected	2025 April Projected	2025 May Projected	2025 June Projected	2025 July Projected	2025 August Projected	2025 September Projected	2025 October Projected	2025 November Projected	2025 December Projected	2025 YE Projected
	TRACKER SUMMARY													
	Requirements Compared to Billed:													
	Revenue Requirements													
1	Erie Substation	25,684	25,684	25,684	25,684	25,684	25,684	25,684	25,684	25,684	25,684	25,684	25,684	308,206
2	Hoot Lake Transformer	4,655	4,655	4,655	4,655	4,655	4,655	4,655	4,655	4,655	4,655	4,655	4,655	55,864
3	Oslo Lake Ardoch	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	352,617
4	Milbank Area Reliability	64,969	64,969	64,969	64,969	64,969	64,969	64,969	64,969	64,969	64,969	64,969	64,969	779,629
5	Total Revenue Requirements	124,693	124,693	124,693	124,693	124,693	124,693	124,693	124,693	124,693	124,693	124,693	124,693	1,496,316
6														
7	Preservation of ADIT Proration													
8														
9	MISO Expenses													
10	MISO Schedule 26 Expense	551,046	534,515	490,431	413,285	363,691	435,327	446,348	446,348	385,732	457,369	457,369	551,046	5,532,506
11	MISO Schedule 26A Expense	451,598	414,304	399,211	352,743	333,454	327,556	345,120	342,118	321,336	348,049	391,035	436,471	4,462,994
12	Total MISO Expenses	1,002,644	948,819	889,642	766,028	697,145	762,882	791,467	788,465	707,069	805,417	848,404	987,518	9,995,500
13														
14	MISO Revenues													
15	MISO Schedule 26 Revenue	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(542,420)	(6,509,035)
16	MISO Schedule 37 & 38 Revenue	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(11,764)	(141,171)
17	MISO Schedule 26A Revenue	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(127,127)	(1,525,526)
18	MISO MVP ARR Revenue	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(569)	(6,825)
19	Total MISO Revenues	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(681,880)	(8,182,557)
20														
21	Net Revenue Requirement	445,457	391,632	332,456	208,841	139,958	205,695	234,281	231,278	149,882	248,231	291,217	430,331	3,309,259
22														
23	Billed (forecast kWh x adj factor)	277,051	254,554	245,082	215,592	205,671	203,709	214,626	210,060	196,901	215,108	244,700	274,326	2,757,378
24														
25	Monthly Revenue Difference	168,407	137,078	87,374	(6,751)	(65,713)	1,987	19,655	21,219	(47,019)	33,123	46,517	156,006	551,881
26	Carrying Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
27	Life-to-Date Revenue Requirement (Cumulative Difference)	(383,474)	(246,396)	(159,022)	(165,773)	(231,487)	(229,500)	(209,845)	(188,626)	(235,645)	(202,522)	(156,006)	0	0
28														
29	BSAT Portion of Tracker Balance													
30	Monthly Change in BSAT Portion of Tracker ¹													
31	BSAT Portion of Tracker Balance ²													
32	Carrying Charge ³													
33	Cumulative Carrying Charge													
34	Carrying cost ⁴													
35														
36														
37	Forecasted Sales (MWh)	271,439	249,398	240,118	211,225	201,506	199,583	210,279	205,805	192,913	210,751	239,744	268,769	2,701,530
38														
39	BSAT Portion of Tracker Balance (%) ⁵													

¹ Line No. 23 x Line No. 39
² Previous Month Line No. 31 - Current Month Line No. 30
³ Commission's November 10, 2020 Order Point 7 in
Docket No. E017/M-18-748
⁴ November 2020 is 20 / 30 of the Short Term-Debt Rate
⁵ Line No. 31/ Line No. 27

SUMMARY	Jan 2025 - Dec 2025
Revenue requirements	\$3,309,259
True-up	(551,881)
Total requirements	\$2,757,378
Jan 2025 - Dec 2025 projected sales	2,701,530
Average Rate	\$0.00102

2025 Attachment O Filing

Line No.						Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)					\$52,174,565
2						
3	REVENUE CREDITS	(Note T)	Total	Allocator		
4	Account No. 454	(page 4, line 34)	195,525	TP 1.00000	195,525	
5	Account No. 456.1	(page 4, line 37)	6,293,147	TP 1.00000	6,293,147	
6	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0	
7	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0	
8	TOTAL REVENUE CREDITS (sum lines 2-5)					6,488,673
9						
10					Wholesale Revenue Credit	12.44%

2024 Attachment O Filing

Line No.						Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)					\$52,174,565
2						
3	REVENUE CREDITS	(Note T)	Total	Allocator		
4	Account No. 454	(page 4, line 34)	195,525	TP 1.00000	195,525	
5	Account No. 456.1	(page 4, line 37)	6,293,147	TP 1.00000	6,293,147	
6	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0	
7	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0	
8	TOTAL REVENUE CREDITS (sum lines 2-5)					6,488,673
9						
10					Wholesale Revenue Credit	12.44%

2023 Attachment O Filing

Line No.						Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)					\$51,258,987
2						
3	REVENUE CREDITS	(Note T)	Total	Allocator		
4	Account No. 454	(page 4, line 34)	222,051	TP 1.00000	222,051	
5	Account No. 456.1	(page 4, line 37)	8,420,585	TP 1.00000	8,420,585	
6	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0	
7	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0	
8	TOTAL REVENUE CREDITS (sum lines 2-5)					8,642,636
9						
10					Wholesale Revenue Credit	16.86%

[illegible]

Line No.	Year>>	2025 Projected Jan	2025 Projected Feb	2025 Projected Mar	2025 Projected Apr	2025 Projected May	2025 Projected Jun	2025 Projected Jul	2025 Projected Aug	2025 Projected Sep	2025 Projected Oct	2025 Projected Nov	2025 Projected Dec	2025 Projected Total
1	RATE BASE													
2	Plant Balance	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283	7,473,283
3	Accumulated Depreciation	(14,360)	(24,429)	(34,499)	(44,568)	(54,638)	(64,708)	(74,777)	(84,847)	(94,917)	(104,986)	(115,056)	(125,125)	(125,125)
4	Net Plant in Service	7,458,924	7,448,854	7,438,785	7,428,715	7,418,645	7,408,576	7,398,506	7,388,436	7,378,367	7,368,297	7,358,228	7,348,158	7,348,158
5	CWIP Calculation:													
6	Beginning Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
7	Additional CWIP	0	0	0	0	0	0	0	0	0	0	0	0	0
8	Removal of Costs Above Soft Cap													
9	Remove Internal Costs													0
10	Closings from CWIP AFDUC	0	0	0	0	0	0	0	0	0	0	0	0	0
11	CWIP (Project #T05032.0322)	107761	0	0	0	0	0	0	0	0	0	0	0	0
12	ADIT Federal Proration Factors		0.9178	0.8411	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027
13	Accumulated Deferred Income Taxes Federal & State		(136,488)	(156,978)	(176,187)	(194,157)	(210,845)	(226,294)	(240,462)	(253,349)	(264,996)	(275,361)	(284,487)	(292,333)
15	Accumulated Deferred Income Taxes Federal		(69,531)	(82,218)	(93,624)	(103,789)	(112,674)	(120,319)	(126,683)	(131,766)	(135,609)	(138,171)	(139,494)	(139,535)
16	Ending rate base		7,322,436	7,291,876	7,262,597	7,234,558	7,207,800	7,182,281	7,158,044	7,135,088	7,113,371	7,092,936	7,073,740	7,055,825
18	Average rate base		599,261	599,261	599,261	599,261	599,261	599,261	599,261	599,261	599,261	599,261	599,261	7,191,131
20	Return on Rate Base		43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	516,054
22	Available for return (equity portion of rate base)		29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	357,903
29	EXPENSES													
30	O&M and Depreciation													
31	Operating Costs		0	0	0	0	0	0	0	0	0	0	0	0
32	Property Tax		8,050	8,050	8,050	8,050	8,050	8,050	8,050	8,050	8,050	8,050	8,050	96,004
33	Property Tax Adjustment		(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(5,787)	(69,445)
34	Book Depreciation		10,070	10,070	10,070	10,070	10,070	10,070	10,070	10,070	10,070	10,070	10,070	120,836
35	Total O&M and Depreciation Expense		12,333	12,333	12,333	12,333	12,333	12,333	12,333	12,333	12,333	12,333	12,333	147,994
37	Income before Taxes													
38	Available for return (from above)		29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	29,825	357,903
39	Taxable Income (grossed up)		41,855	41,855	41,855	41,855	41,855	41,855	41,855	41,855	41,855	41,855	41,855	502,263
41	Income Taxes													
42	Current Income Tax		(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(10,857)	(130,286)
43	Def Income Tax		22,887	22,887	22,887	22,887	22,887	22,887	22,887	22,887	22,887	22,887	22,887	274,647
44	Total Income Tax Expense		12,030	12,030	12,030	12,030	12,030	12,030	12,030	12,030	12,030	12,030	12,030	144,360
46														
47	REVENUE REQUIRMENTS													
48	Expenses		24,363	24,363	24,363	24,363	24,363	24,363	24,363	24,363	24,363	24,363	24,363	292,355
49	Return on rate base		43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	43,004	516,054
50	Subtotal revenue requirements		67,367	67,367	67,367	67,367	67,367	67,367	67,367	67,367	67,367	67,367	67,367	808,408
51	Adjustments		0	0	0	0	0	0	0	0	0	0	0	0
52	Wholesale Revenue Credit		(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(8,378)	(100,537)
53	Total revenue requirements		58,989	58,989	58,989	58,989	58,989	58,989	58,989	58,989	58,989	58,989	58,989	707,871
54														
55	Minnesota share - D2 factor		29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	29,385	352,617

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Rate Update to its Transmission Cost Recovery Rider Annual Adjustment, Rate Schedule 13.05
Docket No. E017/M-24-204**

I, Valerie Moxness, 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
Letter**

Dated this **13th** day of **August, 2025**.

/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	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	24-204M-24-204
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	24-204M-24-204
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		Yes	24-204M-24-204
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	24-204M-24-204
5	Paula	Foster	pfoster@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	24-204M-24-204
6	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	24-204M-24-204
7	Derek	Haugen	dhaugen@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	24-204M-24-204
8	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	24-204M-24-204
9	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	24-204M-24-204
10	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	24-204M-24-204
11	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	24-204M-24-204
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	24-204M-24-204
13	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls	Electronic Service		No	24-204M-24-204

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 56537 United States				
14	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	24-204M-24-204
15	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	24-204M-24-204
16	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	24-204M-24-204
17	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	24-204M-24-204