

215 South Cascade Street  
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218 739-8200  
www.otpco.com (web site)



February 16, 2016

Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 Seventh Place East, Suite 350  
St. Paul, MN 55101-2147

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval  
of a New Base Cost of Energy  
Docket No. E017/MR-15-1034  
Initial Filing**

Dear Mr. Wolf:

Enclosed for filing please find the Petition for Approval of a New Base Cost of Energy of Otter Tail Power Company. Copies of the filing have been served on the Minnesota Department of Commerce – Division of Energy Resources and the Office of the Attorney General – Antitrust & Utilities Division. A summary of the filing has been served on the remaining parties on the enclosed Service Lists.

Please feel free to contact me at (218) 739-8475, or [bgerhardson@otpco.com](mailto:bgerhardson@otpco.com) should you have any questions with respect to this matter.

Sincerely,

*/s/ BRUCE G. GERHARDSON*  
Bruce G. Gerhardson  
Associate General Counsel

jch  
Enclosures  
By electronic filing  
c: Service Lists

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
Nancy Lange  
Dan Lipschultz  
Matt Schuerger  
John Tuma

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Petition of Otter Tail Power  
Company For Approval of a New Base Cost of  
Energy

Docket No. E017/MR-15-1034

**SUMMARY OF FILING**

On February 16, 2016, Otter Tail Power Company (OTP) filed with the Minnesota Public Utilities Commission a Petition for Approval of a New Base Cost of Energy. OTP proposes that the new base cost of energy be effective with the implementation of interim rates in its general electric rate case (Docket No. E017/GR-15-1033) filed contemporaneously with this Petition. The proposed new base cost is 2.4640¢ per kilowatt-hour, an increase of 0.1477¢ from the current base cost of energy of 2.3163¢ per kilowatt-hour. When effective, the fuel clause adjustment will be decreased by 0.1477¢.

STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION

Beverly Jones Heydinger  
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Chair  
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In the Matter of the Petition of Otter Tail Power  
Company For Approval of a New Base Cost of  
Energy

Docket No. E017/MR-15-1034

**PETITION**

**I. INTRODUCTION**

Otter Tail Power Company (OTP and the Company) hereby submits to the Minnesota Public Utilities Commission (Commission) this Petition to Establish a New Base Cost of Energy in OTP's Energy Adjustment Rider (EAR) rate schedule. OTP proposes the new base cost of energy coincide with the implementation of interim rates in OTP's general electric rate case filing (Docket No. E017/GR-15-1033). This filing was submitted at the same time as OTP's Petition for Authority to Increase Rates for Electric Utility Service.

**II. SUMMARY OF FILING**

Pursuant to Minn. Rule 7829.1300, Subp. 1, a one-paragraph summary of the filing accompanies this petition.

**III. SERVICE ON OTHER PARTIES**

Pursuant to Minn. Rule 7829.1300, Subp. 2, OTP has served a copy of this Petition on the Department of Commerce - Division of Energy Resources and the Office of the Attorney General - Antitrust and Utilities Division. A summary of the filing has also been served on all parties on OTP's general service list and the official service list from our last rate case (Docket No. E017/GR-10-239). A certificate of service and the service lists are attached.

#### **IV. GENERAL FILING INFORMATION**

Pursuant to Minn. Rule 7829.1300, Subp. 3, OTP provides the following required information:

**A. Name, address, and telephone number of utility**

Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls, MN 56537  
(218) 739-8200

**B. Name, address, electronic address and telephone number of utility attorneys**

Bruce Gerhardson  
Associate General Counsel  
Otter Tail Power Company  
PO Box 496  
215 South Cascade Street  
Fergus Falls, MN 56538-0496  
[bgerhardson@otpc.com](mailto:bgerhardson@otpc.com)  
(218) 739-8475

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215 South Cascade Street  
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[cstephenson@otpc.com](mailto:cstephenson@otpc.com)  
(218) 739-8956

Richard J. Johnson  
Moss & Barnett  
150 South Fifth Street  
Suite 1200  
Minneapolis, MN 55402  
[rick.johnson@lawmoss.com](mailto:rick.johnson@lawmoss.com)  
(612) 877-5275

**C. Date of filing and date modified rates are to become effective**

The date of the submission of this Petition is February 16, 2016. Pursuant to Minn. Stat. § 216B.16, Subd. 1, OTP requests approval of the new base cost of energy and corresponding revised tariff sheet effective with the implementation of interim rates in Docket No. E017/GR-15-1033, which will occur no earlier than April 16, 2016.

**D. Statute Controlling Schedule for Processing the Filing**

Minn. Stat. § 216B.16, Subd. 1, requires 60 days’ notice to the Commission of a proposed tariff change, after which the proposed change will take effect if not suspended. Under the Commission’s Rules, the proposed tariff change addressed in this Petition is considered to be a “miscellaneous filing” as no determination of OTP’s general revenue requirement is necessary. Minn. Rule 7829.1400, Subps. 1 and 4, permit comments in response to a miscellaneous filing within 30 days of filing, with reply comments due 10 days thereafter.

**E. Utility Employee Responsible for Filing**

Stuart Tommerdahl  
Manager, Regulatory Administration  
Otter Tail Power Company  
PO Box 496  
215 South Cascade Street  
Fergus Falls, MN 56538-0496  
[stommerdahl@otpc.com](mailto:stommerdahl@otpc.com)  
(218) 739-8279

**V. DESCRIPTION AND PURPOSE OF FILING**

**A. Background**

OTP’s current base cost of energy is 2.3163¢ per kilowatt-hour, which was approved by the Commission in Docket No. E017/MR-10-240.

Since the Commission’s approval of the base cost factor in E017/MR-10-240, energy costs have increased slightly since OTP last set its base cost of energy. For the test year, we have determined the average annual fuel and purchased power costs to be 2.4640¢ per kilowatt-hour, an increase of 0.1477¢ from the current base energy cost of 2.3163¢.

**B. Description of the Revised Base Cost of Energy**

Consistent with Minn. Rule 7825.2600, Subp. 2, OTP requests that the Commission approve a new base cost of energy of 2.4640¢ per kilowatt-hour to coincide with implementation of interim rates in Docket No. E017/GR-15-1033; our Petition for Interim Rates proposes interim rates that use the base cost of energy requested in this instant filing.

The revised base cost calculation, included in Attachment 1 to this Petition, is based on information used in our electric rate case filing. Specifically, the revised base cost incorporates rate case information regarding:

- Total system fuel and energy costs, excluding costs of fuel associated with intersystem sales, MISO Schedule 16, 17 and 24 charges and other production related costs not authorized for fuel clause recovery.

- 2016 Test Year calendar month sales, and
- 2016 Test Year calendar month costs.

Consistent with the approach used in our last general electric rate case proceeding (Docket No. E017/GR-10-239), our proposed base cost reflects the combination of the current base cost of energy (2.3163¢ per kilowatt-hour) and a simple average of forecast fuel costs for 2016 above that base amount (0.1477¢ per kilowatt-hour), for a total of 2.4640¢ per kilowatt-hour. This approach ensures no change in rate design during the interim rate period, in that fuel and purchased power costs will continue to be recovered from customers just as if we had not changed the base cost and had continued to collect any shortfall or credit any surplus to customers through the EAR. Upon implementation of final rates in our pending electric rate case filing, a revised base cost of energy will likely be established using updated class usage information adopted in that case, subject to the terms of the Commission's final Order.

### **C. Proposed Tariff Sheets**

Attachment 2 to this Petition is the Redlined and Non-redlined proposed EAR tariff sheets showing the requested base cost of energy. Our Petition for Interim Rates in Docket E017/GR-15-1033 contains Redlined and Non-redlined tariff sheets of proposed interim rates that incorporate the requested change to base cost of energy from the current 2.3163¢ per kilowatt-hour to 2.4640¢, reflecting an increase of 0.1477¢.

## **VI. EFFECT OF CHANGE UPON OTTER TAIL POWER COMPANY**

This Petition does not affect the Company's revenues. Rather, it simply shifts the costs currently recovered through the EAR to the base cost of energy. Because the EAR adjusts monthly and is trued up to collect actual costs incurred, any change in revenue is offset by a change in cost.

## **VII. CONCLUSION**

Otter Tail Power Company respectfully requests Commission approval of the Company's proposed new base cost of energy and corresponding EAR tariff to be effective with the interim rates in the general electric rate case.

Dated: February 16, 2016

Respectfully submitted,

OTTER TAIL POWER COMPANY  
BY

*/s/ THOMAS R. BRAUSE*

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Thomas R. Brause  
Vice President, Administration

Otter Tail Power Company  
Average Energy Supply Cost per kWh Sold with adjustments as filed in Docket E017/MR-15-1034  
Test Year Ending 2016

Line No.	Month	(A) (C)+(D)+(F) Less (E) = Total costs	(B) Retail kWh Sales	(C) Purchased Power	(D) Generation Costs	(E) Less: Intersystem Sales (1)	(F) Net Retail MISO Day 2
1	Jan	\$12,441,606	494,133,827	\$6,801,000	\$5,640,606	\$0	\$0
2	Feb	\$11,315,151	452,643,623	\$6,207,000	\$5,110,328	(\$2,177)	\$0
3	Mar	\$10,435,974	430,535,833	\$5,696,500	\$4,739,474	\$0	\$0
4	Apr	\$9,073,199	377,319,772	\$6,565,600	\$2,507,599	\$0	\$0
5	May	\$8,286,172	347,740,602	\$5,492,500	\$2,793,672	\$0	\$0
6	Jun	\$8,085,211	337,352,803	\$4,072,200	\$4,097,686	(\$84,675)	\$0
7	Jul	\$9,542,369	366,117,619	\$4,552,000	\$5,022,155	(\$31,786)	\$0
8	Aug	\$10,187,608	391,930,573	\$4,787,600	\$5,402,322	(\$2,314)	\$0
9	Sep	\$9,346,466	388,101,597	\$5,337,200	\$4,059,204	(\$49,938)	\$0
10	Oct	\$9,168,145	397,160,864	\$5,794,000	\$3,374,145	\$0	\$0
11	Nov	\$10,971,044	454,827,928	\$5,845,200	\$5,139,784	(\$13,940)	\$0
12	Dec	\$12,894,725	503,230,771	\$7,455,300	\$5,441,738	(\$2,313)	\$0
13	Total as originally filed	\$121,747,670	4,941,095,811	\$68,606,100	\$53,328,713	(\$187,143)	\$0
19	New Proposed Base Cost per kWh = (A)/(B), Line 16		<b>\$0.024640</b>				
20	Base Cost Ordered in Docket No. E017/MR-10-240		0.023163				
21	Difference - change from originally proposed base		0.001477				

## Attachment 2

Redlined and Non-redlined  
Proposed Energy Adjustment Rider Tariff Sheets





Fergus Falls, Minnesota

**ENERGY ADJUSTMENT RIDER**

DESCRIPTION	RATE CODE
Energy Adjustment Rider	31-540

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

There shall be added to or deducted from the monthly bill the amount per Kilowatt-Hour (rounded to the nearest 0.001¢) that the average cost of energy is above or below ~~2.46402~~<sup>2.3163</sup>¢ per Kilowatt-Hour. The average cost of energy shall be based upon the cost of energy during the two months immediately preceding the month when the cost of energy is calculated, divided by all Kilowatt-Hour sales exclusive of intersystem sales for the same two-month period. The applicable adjustment will be applied to each Customer's bill beginning with cycle 1 of the calendar month following the month when the adjustment is calculated. The cost of energy shall be determined as follows:

1. The cost of fuel, as recorded in Account 151, used in the Company's generating plants.
2. The energy cost of purchased power included in Account 555 when such energy is purchased on an economic dispatch basis, exclusive of Capacity or Demand charges.
3. The net energy cost of purchases from a qualifying facility, as that term is defined in 18 C.F.R. Part 292 and Minn. Rule 7835.0100, Subp. 19, as amended, whether or not those purchases occur on an economic dispatch basis, and all fuel and purchased energy expenses incurred by the Company over the duration of any Commission-approved contract, as provided for by Minnesota Statutes, Section 216B.1645, except any such expense identified in 216B.1645, subd. 1(1), and subd. 1(2) to satisfy the renewable energy obligations set forth in Minnesota Statutes, Section 216B.1691.
4. All Midwest ISO (MISO) costs and revenues associated with retail sales that have been authorized by the Commission to flow through this Energy Adjustment Rider and excluding MISO costs and revenues that are recoverable in base rates, as prescribed in applicable Commission Orders.
5. Renewable energy purchased for the TailWinds program is not included in the cost of energy adjustment calculation.



Fergus Falls, Minnesota

Minnesota Public Utilities Commission  
Section 13.01  
ELECTRIC RATE SCHEDULE  
Energy Adjustment Rider

Page 2 of 2

~~Twelfth~~<sup>Eleventh</sup> Revision

6. The actual identifiable fuel costs associated with energy purchased for reasons other than in 2 and 3 above.
7. Less the fuel-related costs recovered through intersystem sales.
8. Less a credit for asset-based margins: 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 revenues for this calculation are those received from sales of excess generation; the 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 transmission costs incurred that are required to make such sales.

In addition there shall be an annual true-up for any amount collected over or under the actual cost of energy for the twelve months ending June 30 of each year as reported in the Annual Automatic Adjustment report filed according to Minnesota Rule 7825.2810. The annual true-up shall be based on a historic twelve-month period and shall be applied to the subsequent twelve months. The annual true-up will be effective on billings beginning September 1 of the current year through August 31 of the following year, when a new true-up rate will be calculated and applied. In years when the over- or under-recovery amount is small (a rate rounded to less than 0.001¢), an annual true-up rate shall not apply.

The annual true-up rate shall be calculated as follows. The over- or under-recovery amount as shown in the current year Annual Automatic Adjustment report will be divided by the Minnesota Kilowatt-Hours subject to the fuel adjustment clause from the same report. This calculation will produce a true-up rate per Kilowatt-Hour (rounded to the nearest 0.001¢) that will be applied to Customers’ bills in the same manner as the monthly cost of energy adjustment.

**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.



Fergus Falls, Minnesota

**ENERGY ADJUSTMENT RIDER**

DESCRIPTION	RATE CODE
Energy Adjustment Rider	31-540

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

There shall be added to or deducted from the monthly bill the amount per Kilowatt-Hour (rounded to the nearest 0.001¢) that the average cost of energy is above or below 2.4640¢ per Kilowatt-Hour. The average cost of energy shall be based upon the cost of energy during the two months immediately preceding the month when the cost of energy is calculated, divided by all Kilowatt-Hour sales exclusive of intersystem sales for the same two-month period. The applicable adjustment will be applied to each Customer's bill beginning with cycle 1 of the calendar month following the month when the adjustment is calculated. The cost of energy shall be determined as follows:

**R**

1. The cost of fuel, as recorded in Account 151, used in the Company's generating plants.
2. The energy cost of purchased power included in Account 555 when such energy is purchased on an economic dispatch basis, exclusive of Capacity or Demand charges.
3. The net energy cost of purchases from a qualifying facility, as that term is defined in 18 C.F.R. Part 292 and Minn. Rule 7835.0100, Subp. 19, as amended, whether or not those purchases occur on an economic dispatch basis, and all fuel and purchased energy expenses incurred by the Company over the duration of any Commission-approved contract, as provided for by Minnesota Statutes, Section 216B.1645, except any such expense identified in 216B.1645, subd. 1(1), and subd. 1(2) to satisfy the renewable energy obligations set forth in Minnesota Statutes, Section 216B.1691.
4. All Midwest ISO (MISO) costs and revenues associated with retail sales that have been authorized by the Commission to flow through this Energy Adjustment Rider and excluding MISO costs and revenues that are recoverable in base rates, as prescribed in applicable Commission Orders.
5. Renewable energy purchased for the TailWinds program is not included in the cost of energy adjustment calculation.



Fergus Falls, Minnesota

6. The actual identifiable fuel costs associated with energy purchased for reasons other than in 2 and 3 above.
7. Less the fuel-related costs recovered through intersystem sales.
8. Less a credit for asset-based margins: 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 revenues for this calculation are those received from sales of excess generation; the 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 transmission costs incurred that are required to make such sales.

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The annual true-up rate shall be calculated as follows. The over- or under-recovery amount as shown in the current year Annual Automatic Adjustment report will be divided by the Minnesota Kilowatt-Hours subject to the fuel adjustment clause from the same report. This calculation will produce a true-up rate per Kilowatt-Hour (rounded to the nearest 0.001¢) that will be applied to Customers’ bills in the same manner as the monthly cost of energy adjustment.

**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.

**CERTIFICATE OF SERVICE**

**RE: In the Matter of the Petition of Otter Tail Power Company for Approval  
of a New Base Cost of Energy  
Docket No. E017/MR-15-1034**

I, Jana C. Hrdlicka, 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 the Office of Attorney General – Antitrust & Utilities Division 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 16th day of February, 2016

/s/ JANA C. HRDLICKA  
Jana C. Hrdlicka  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8879

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
John	Lindell	agorud.ecf@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	apmoratzka@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Matt	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	12 S 6th St Ste 1137  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case
Patrick	Zomer	Patrick.Zomer@lawmoss.com	Moss & Barnett a Professional Association	150 S. 5th Street, #1200  Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_General Service List - Rate Case

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Julia	Anderson	Julia.Anderson@ag.state.mn.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_10-239_Official
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_10-239_Official
Thomas	Bailey	tbailey@briggs.com	Briggs And Morgan	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-239_Official
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street North St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-239_Official
Tammie	Carino	tcarino@GREnergy.com	Great River Energy	12300 Elm Creek Blvd.  Maple Grove, MN 55369-4718	Electronic Service	No	OFF_SL_10-239_Official
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_10-239_Official
Piedmont	Consulting	N/A	Piedmont Consulting, Inc.,	701 4th Ave S Ste 500  Minneapolis, MN 55402	Paper Service	No	OFF_SL_10-239_Official
Derick O.	Dahlen	derick.dahlen@avantenergy.com	Avant Energy Services	220 S. Sixth St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-239_Official
William T	Davis	N/A	-	23456 Garland Ln  Battle Lake, MN 56515-9665	Paper Service	No	OFF_SL_10-239_Official
Ian	Dobson	ian.dobson@ag.state.mn.us	Office of the Attorney General-RUD	Antitrust and Utilities Division 445 Minnesota Street, BRM Tower St. Paul, MN 55101	Electronic Service 1400	No	OFF_SL_10-239_Official



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Emma	Fazio	emma.fazio@stoel.com	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-239_Official
Thomas E.	Ferguson	N/A	Ferguson Consulting, LLC	5740 Kehtel Rd  Duluth, MN 55811	Paper Service	No	OFF_SL_10-239_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 500  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_10-239_Official
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_10-239_Official
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	Yes	OFF_SL_10-239_Official
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_10-239_Official
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2  Superior, WI 54880	Electronic Service	Yes	OFF_SL_10-239_Official
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_10-239_Official
J. Vincent	Jones	vince.jones@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_10-239_Official

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_10-239_Official
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E  St. Paul, MN 55106	Electronic Service	No	OFF_SL_10-239_Official
Patrick	Mastel	N/A	Missouri River Energy Services	3724 W. Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Paper Service	No	OFF_SL_10-239_Official

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Jeffrey L.	Nelson	jnelson@eastriver.coop	East River Electric Power Coop.	121 SE First Street PO Box 227 Madison, SD 57042	Electronic Service	No	OFF_SL_10-239_Official
Gary	Oetken	goetken@agp.com	Ag Processing, Inc.	12700 West Dodge Road P.O. Box 2047 Omaha, NE 681032047	Electronic Service	No	OFF_SL_10-239_Official
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Tim	Rogelstad	trogelstad@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56538	Electronic Service	Yes	OFF_SL_10-239_Official
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