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VIA E-FILING

April 30, 2007

Dr. Burl W. Haar
Executive Secretary
MN Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

RE: In The Matter of the Commission's Investigation into the
Appropriateness of Continuing to Permit Cost Adjustments
Docket E999/CI-03-802

Dear Dr. Haar:

On March 30, 2007, the Public Utilities Commission issued a Notice for Comments in the above docket. Otter Tail Corporation d/b/a Otter Tail Power Company (Otter Tail) provides the following comments.

As noted in the Notice, since the docket was opened and comments were filed, several of the concerns initially raised have been addressed through other dockets. The Notice lists several additional issues that may fall into this generic automatic adjustment docket and invites commenters to list others. The issues listed are potentially significant items, and while Otter Tail does not wish to minimize their significance, we believe the pattern has been established. The pattern is that when a significant issue arises, it is resolved either through a docket pertaining to the utility involved, or through consolidated or generic dockets whose specific purpose is to provide a timely answer to the issue or issues in question. Beyond that, the Department of Commerce (Department) at times has seen a need and taken the initiative to meet it. The example of that initiative which pertains to the FCA relates to the items of "data reporting including what is reported and how frequently" and "regulatory oversight of FCA data reporting." The Department's newly developed quarterly FCA report and the reporting requirements coming from both the MISO Day 2 dockets and the AAA Report dockets deal with these two topics.

In a meeting just last week, the Department discussed its plans to prioritize its workload to make the best use of its resources. The regulated utilities are dealing with the same issue. While

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exploring the issues listed or other issues related to the FCA might be useful sometime in the future, we submit that unless a specific short-term or long-term benefit can be defined for spending resources on additional comments and hearings related to generic FCA issues listed here, this docket should be closed. History has shown that specific FCA topics relating to one or to all utilities can be successfully explored when needed. In those instances, a specific issue, goal or benefit guides the participants. Any benefits derived from exploring issues in this generic docket are not well enough defined to merit allocation of scarce resources at this time. Therefore, Otter Tail respectfully suggests that this docket should be closed.

Very truly yours,

/s/ BERNADEEN BRUTLAG

Bernadeen Brutlag

Manager, Regulatory Services

Cc: Service List

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