

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)

June 4, 2025



Mr. Will Seuffert
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
Solway and Abercrombie Solar Projects
Docket No. E017/M-24-404
Proposed Decision Options**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power or Company) respectfully submits to the Minnesota Public Utilities Commission (Commission) proposed decision options supplementing the decision options set forth in Staff Briefing Papers filed May 28, 2025. Where we are offering modifications to an existing decision option, we have included the strikethrough and underline changes. We have also included these proposed decision options in a separate document attached to this letter. We recognize the numbering of our proposed decision options may need to be altered should there be other parties filing decision options.

Under the "Approval" section, we offer the following decision option 4.1 as an alternative to decision option 4:

- 4.1 Authorize future cost recovery of the Projects, ~~including OTP's proposal to charge its Minnesota ratepayers for North Dakota's share of the solar projects, in accordance with the allocation methodology described in OTP's May 23, 2025, Supplemental Information filing,~~ through the Renewable Resources Cost Recovery Rider under Minn. Stat. § 216B.1645, subd. 2a, subject to Commission review and approval of specific costs to be presented in a future petition.

Under the "Cost Recovery" section, we offer the following decision option 6.1:

- 6.1 Authorize OTP to request Commission approval to exceed the symmetrical cost cap if it can show that any costs it incurred above the cap are the result of a government action (e.g. tariff, trade investigation, etc.) or other circumstances similarly beyond OTP's control such as wars, terrorist attacks, natural disasters, embargos, pandemics and related Acts of God that causes a meaningful disruption to solar ~~panel~~ project supplies and market prices.

Also under the “Cost Recovery” section, we offer the following decision option 7.1:

- 7.1 Limit cost recovery to an aggregate capital cost cap for the Projects, with the capital cost recovered being set at the costs bid by OTP for Solway Solar and Abercrombie Solar combined, provided however that OTP may request Commission approval to exceed the aggregate cost cap for necessary and prudently incurred costs.

The proposed decision option 6.1 is a modification of the Department's proposed symmetrical, aggregate cost cap. The proposed decision option 7.1 reflects a soft cap. In our Reply Comments we referenced both approaches and offer these decision options for the Commission's consideration.

Finally, we offer (but do not support) the following decision option 8.1:

- 8.1 Reject Otter Tail's proposal to charge its Minnesota ratepayers in accordance with the allocation methodology described in Otter Tail's May 23, 2025, Supplemental Informational filing.

We offer this decision option to be consistent with the proposed decision option 4.1.

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.

Please contact me at 218-739-8956 or cstephenson@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

vjm
Enclosures
By electronic filing
c: Service List

Under the “Approval” section, we offer the following decision option 4.1 as an alternative to decision option 4:

- 4.1 Authorize future cost recovery of the Projects, ~~including OTP’s proposal to charge its Minnesota ratepayers for North Dakota’s share of the solar projects, in accordance with the allocation methodology described in OTP’s May 23, 2025, Supplemental Information filing,~~ through the Renewable Resources Cost Recovery Rider under Minn. Stat. § 216B.1645, subd. 2a, subject to Commission review and approval of specific costs to be presented in a future petition.

Under the “Cost Recovery” section, we offer the following decision option 6.1:

- 6.1 Authorize OTP to request Commission approval to exceed the symmetrical cost cap if it can show that any costs it incurred above the cap are the result of a government action (e.g. tariff, trade investigation, etc.) or other circumstances similarly beyond OTP’s control such as wars, terrorist attacks, natural disasters, embargos, pandemics and related Acts of God that causes a meaningful disruption to solar ~~panel~~ project supplies and market prices.

Under the “Cost Recovery” section, we offer the following decision option 7.1:

- 7.1 Limit cost recovery to an aggregate capital cost cap for the Projects, with the capital cost recovered being set at the costs bid by OTP for Solway Solar and Abercrombie Solar combined, provided however that OTP may request Commission approval to exceed the aggregate cost cap for necessary and prudently incurred costs.

We offer (but do not support) the following decision option 8.1:

- 8.1 Reject Otter Tail’s proposal to charge its Minnesota ratepayers in accordance with the allocation methodology described in Otter Tail’s May 23, 2025, Supplemental Information filing.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval
of the Solway and Abercrombie Solar Projects
Docket No. E017/M-24-404**

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
Proposed Decision Options**

Dated this **4th** day of **June, 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	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-24-404
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		Yes	M-24-404
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	M-24-404
4	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	M-24-404
5	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-24-404
6	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-24-404
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	M-24-404
8	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-24-404
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	M-24-404
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	M-24-404
11	Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-24-404
12	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-24-404
13	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls	Electronic Service		No	M-24-404

#	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@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-24-404
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	M-24-404
16	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-24-404
17	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-24-404
18	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-24-404