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January 13, 2020



Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 7th Place East
St. Paul, MN 55101-2147

**RE: In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities
Docket No. E999/CI-19-704
Initial Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits its Comments in response to the Minnesota Public Utilities Commission's (Commission) December 13, 2019 notice in the above described matter. In these Comments, Otter Tail responds to the topics open for comment.

Topics Open for Comment:

- *Regarding the scope of this investigation, should there be any additions or clarifications to the direction given by the Commission in ordering paragraphs 8, 9, and 10 of the November 13, 2019 Order (AA-18-373)?*

Otter Tail requests that the Commission affirm that the March 1, 2020 filing is to include information for the July 1, 2018 through December 31, 2019 period.

Otter Tail would also like clarification of whether Otter Tail's Hoot Lake Plant and the associated analysis can be excluded from the upcoming filing considering Hoot Lake Plant's upcoming retirement scheduled for the spring of 2021. One of Hoot Lake Plant's two units operates and is self-scheduled into the market only during the winter months to provide heat to the plant. During the rest of the year, the plant is only dispatched on an economic basis.

- *Are there issues that should be addressed in this investigation in addition to those specified in the November 13, 2019 Order (AA-18-373)? What issues should be addressed in the annual March 1 seasonal dispatch / strategic economic commitment compliance filings?*

Otter Tail does not recommend any additions to those issues identified by the Commission's November 13, 2019 Order (AA-18-373).

- *What is the appropriate timeline for comments and reply comments in this investigation?*

Otter Tail proposes that following the March 1, 2020 Initial Filing Ordered by the Commission's November 13, 2019 Order (AA-18-373) that Comments be due May 1, 2020 and Reply Comments be due June 1, 2020.

- *Are there other issues or concerns related to this matter?*

Otter Tail does not identify any additional items related to this matter.

Otter Tail has electronically filed this document with the Minnesota Public Utilities Commission and is serving a copy on all persons on the Official Service List for this docket. A Certificate of Service is also enclosed.

Should you have any questions regarding this filing, please contact me at 218-739-8279 or stommerdahl@otpc.com.

Sincerely,

/s/ *STUART TOMMERDAHL*
Stuart Tommerdahl
Manager, Regulatory Administration

kaw
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of an Investigation into Self-Commitment and Self-Scheduling of Large Baseload Generation Facilities
Docket No. E999/CI-19-704**

I, Kim Ward, 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 Letters of Availability to all other persons on the attached service list by electronic service or by first class mail.

**Otter Tail Power Company
Initial Comments**

Dated this 13th day of January 2020.

/s/ KIM WARD

Kim Ward
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8268

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Ryan	Barlow	ryan.barlow@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 55101214	Electronic Service	Yes	OFF_SL_19-704_Official
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-704_Official
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-704_Official
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_19-704_Official
Isabel	Ricker	ricker@fresh-energy.org	Fresh Energy	408 Saint Peter Street Suite 220 Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-704_Official
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-704_Official
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