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November 17, 2025



Ms. Sasha Bergman
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of the Application of Otter Tail Power Company for
Authority to Increase Rates for Electric Service in Minnesota
Docket No. E017/GR-25-359
Reply Comments**

Dear Ms. Bergman:

Otter Tail Power Company hereby submits to the Minnesota Public Utilities Commission (Commission) the enclosed Reply Comments.

We have electronically filed this document with the Commission and copies have been served on the 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

kaw
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of the Application of
Otter Tail Power Company for
Authority to Increase Rates for
Electric Service in Minnesota**

**Docket No. E017/GR-25-359
REPLY COMMENTS**

I. INTRODUCTION

Otter Tail Power Company (OTP) submits these Reply Comments in response to the November 10, 2025 Comments of the Minnesota Department of Commerce (Department), the Office of the Attorney General – Residential Utilities Division (OAG) and the Citizens Utility Board (CUB). OTP respectfully requests that the Minnesota Public Utilities Commission (Commission) accept OTP’s general rate case filing as substantially complete as of October 31, 2025, with the additional information requested by the Department.¹

OTP also asks that the Commission reject the arguments of the Department, OAG, and CUB to modify the interim rates proposed by OTP. Instead, OTP proposes to increase the credits available under its Uplift program for the months January 2026 – April 2026 in order to make sure there is adequate support for qualifying customers during the winter of 2026. Further, effective January 1, 2026 (concurrent with implementation of interim rates), OTP will begin refunding approximately \$3.0 million of excess Energy Adjustment Rider (EAR) collections to customers. This refund also will occur in January 2026 – April 2026. This will provide bill savings to all customers.

OTP takes no position on CUB’s petition to intervene, and is not opposed to providing an e-mailed copy of the customer notice that is being used for general publication to those customers with e-mail on file.

As discussed in more detail below, there are not exigent circumstances justifying deviation from the interim rates as proposed by OTP. The federal government has now shutdown 15 times since 1980, making these events relatively common at this point. More importantly, while the shutdown undoubtedly caused harm to many individuals, it is now over – before interim rates have even gone into effect. Further, the statistics put

¹ The Department identified that OTP’s October 31, 2025 filing inadvertently omitted schedules identifying Minnesota jurisdictional federal and state income tax expense and deferred income taxes for the most recent fiscal year and the projected fiscal year. OTP appreciates the Department bringing this inadvertent oversight to our attention. The schedules were filed in eDockets on September 14, 2025.

forward by the Department and CUB are general to Minnesota (or the United States); neither has offered any evidence regarding the conditions of OTP's customers specifically. As the Commission is aware, OTP's rural, western Minnesota service area is not the same as the Twin Cities metropolitan area: the conditions of one cannot be assumed to be the same as the other. This lack of evidentiary basis is compounded by the arbitrary nature of the proposed reductions to interim rates. Neither the Department nor CUB identify any basis in cost or economics for their recommendations. The adjustment ultimately is arbitrary and therefore cannot be considered "just and reasonable."²

As also discussed in more detail below, including Coyote Station undepreciated plant balance in interim rates is warranted. The costs are depreciation to be collected after December 31, 2031 – the date by which OTP must cease collecting all Coyote Station costs from Minnesota customers. These costs are like nature and kind as Coyote Station depreciation that OTP has collected for nearly half a century and appropriately part of interim rates.

II. REPLY COMMENTS

A. Interim Rates

OTP requests that the Commission reject the recommendations of the Department, CUB, and the OAG to modify the interim rates proposed in this case. OTP recognizes the interest in mitigating the impact of rate increases on customers, but modifying the interim rate is not the appropriate method for accomplishing this goal. At the beginning of this section, OTP will describe modifications to its Uplift program intended to help customers who need it the most. These modifications will be coupled with EAR refunds in 2026, providing further support to customers in need (as well as all customers).

Minnesota law provides a formula for interim rates that can only be modified when there are exigent circumstances, which are not present here. Further, the OAG's argument to exclude expenses related to Coyote Station are incorrect because the expenses are of the same nature and kind as expenses already included in rates.

1. Increased Uplift Credits and EAR Refunds

OTP recognizes the desire to minimize rate increases, particularly at the present time. That desire is core to who we are as a company, as explained in the Direct Testimony of Matthew J. Olsen:

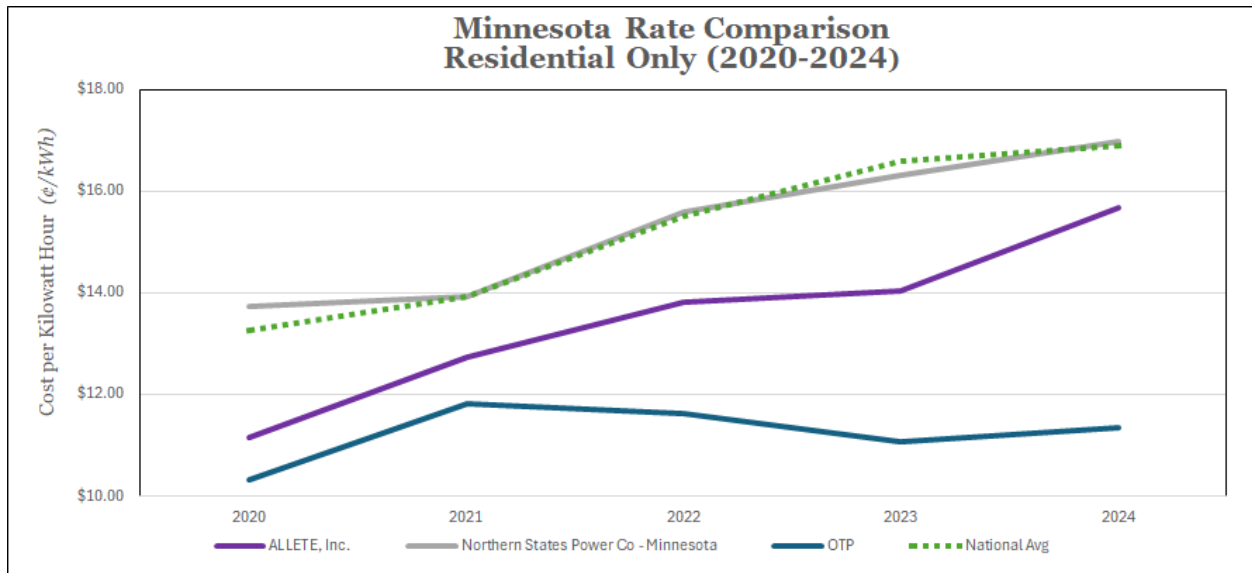
² Minn. Stat. § 216B.03.

OTP consistently has pursued beneficial projects that allow us to provide service to our customers efficiently, applying rate base dollars to low-cost, yet well-performing assets. OTP’s staff work diligently to provide electric service with customers in mind, as our customers are our neighbors.

Applying the resourcefulness and work ethic common to our service territory, OTP employees continue to find ways to construct and operate utility assets to provide the greatest value for customers. While this testimony supports a request to increase rates, the infrequency of OTP’s rate case filings and the relative amounts of those increases are demonstrations of our ability to manage the revenue required to provide utility service.³

This focus is demonstrated in our rates, which in 2024, were 31 percent *below* the national average for all customers. In 2024, Residential rates were even further below the national average, and OTP’s overall and Residential rates are the lowest among Minnesota investor-owned utilities.

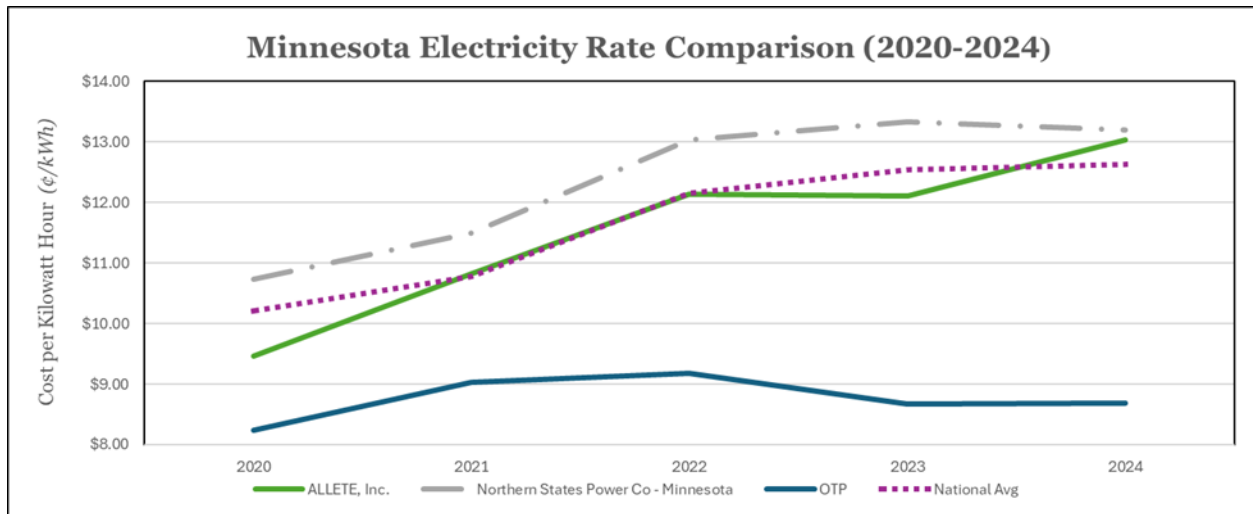
Figure 1⁴



³ Ex. OTP-4 at 4 (Olsen Direct).

⁴ Ex. OTP-4 at 3 (Olsen Direct).

Figure 2⁵



While our low rates benefit all customers, we recognize that some require additional assistance. OTP created its Uplift program to do just that. Uplift provides bill assistance of \$15.00, \$25.00 or \$40.00 per month to qualifying customers, with the credit depending on the customer’s annual usage. Currently, OTP’s Uplift program has a positive tracker balance of approximately \$240,000. Instead of adjusting interim rates, OTP proposes to increase Uplift credits as shown below:

Table 1
Proposed Uplift Credits⁶

Tier	Annual Usage	Uplift Credit January 2026 – April 2026	Uplift Credit May 2026 and Thereafter
Tier 1	=> 12000 kWh Annually	\$60.00	\$40.00
Tier 2	> 7500 and < 12000 kWh Annually	\$37.50	\$25.00
Tier 3	<=7500 kWh Annually	\$22.50	\$15.00

⁵ Ex. OTP-4 at 3 (Olsen Direct).

⁶ See Attachment 1, which includes clean and redline versions of OTP’s Electric Tariff Schedule 13.07, implementing the proposed Uplift credits. OTP requests that these tariff revisions be allowed to go into effect on less than 60-days’ notice.

The increased Uplift credit is designed to help offset the interim rate increase for customers at the various usage tiers. We believe this is a better approach to addressing the challenges faced by low-income customers than the proposals put forward by the Department⁷ and CUB.⁸

OTP also has an approximately \$3 million excess balance in the EAR. OTP will make a filing before the end of November with a proposal to begin crediting that amount to customers through an adjustment to rates in the EAR beginning January 2026, again, concurrent with the implementation of interim rates. OTP proposes to refund this credit balance over four months, January through April 2026, to focus the bill impact of this credit during months of winter heating. This refund will benefit all customers, including low-income customers.

OTP has successfully maintained low rates for years, to customers' benefit. During the present time, we propose bolstering those benefits through increased Uplift assistance and EAR crediting.

2. Exigent Circumstances (Department, CUB)

Both the Department and CUB assert exigent circumstances justify departing from the statutory interim rate framework, citing effects of the federal government shutdown.⁹ The Commission should reject these arguments because exigent circumstances are not present.

OTP acknowledges that there recently was a government shutdown that had impacts on our customers. But even though this shutdown was longer than ones in the past, government shutdowns are no longer unusual. The federal government has shutdown 15 times since 1980.¹⁰ At this stage, government shutdowns appear to be an unfortunate but persistent byproduct of dynamics within the federal government and can no longer be considered extraordinary. Events that occur with this level of frequency are not emergency situations that can support a finding of exigent circumstances. Further, the shutdown ended before interim rates have begun, and the shutdown will not impact customers during the rate case.

The Commission has routinely found that general economic conditions do not warrant a finding of exigent circumstances. For example, in Minnesota

⁷ See Department Comments at 6.

⁸ CUB Comments at 5-6.

⁹ Department Comments at 5-6; CUB Comments at 3-5.

¹⁰ The recent shutdown was the fifteenth government shutdown since 1980. Melissa Quinn, *A History of Government Shutdowns: The 15 Times Funding has Lapsed Since 1980*, CBS NEWS (Nov. 13, 2025), <https://www.cbsnews.com/news/government-shutdown-history-congress/>.

Power’s 2023 rate case, the Commission was unpersuaded that economic conditions at that time, including inflation, housing costs, resumption of student loan payments, and cost of childcare, among other factors, supported a finding of exigent circumstances.¹¹ Similarly, in CenterPoint Energy’s 2023 rate case, the Commission was unpersuaded that “a crisis in household budgeting” caused by similar factors constituted exigent circumstances.¹² Rather, the instances in which the Commission has found exigent circumstances involved a global pandemic¹³ and when interim rates were implemented almost immediately following a base rate increase.¹⁴ It has been over 3 years since the rates established in OTP’s last rate case went into effect, and we clearly are not in the same situation as during the pandemic.

Even if a federal government shutdown could support a finding of exigent circumstances, other actions have been taken to mitigate its impact on OTP’s customers. On November 8 (two days before the Department and CUB filed their initial comments), Governor Walz confirmed that Supplemental Nutrition Assistance Program (SNAP) benefits had been restored,¹⁵ and are approved through at least September 2026. While there may be uncertainty around the Low-Income Home Energy Assistance Program (LIHEAP),¹⁶ neither that uncertainty nor the federal government shutdown impacts eligibility for OTP’s Uplift program, which, as discussed above, will provide increased bill assistance through the remainder of the 2025-2026 heating season. The amount of additional Uplift assistance is generally calibrated to match expected interim rate bill impact for the average customer in each tier.

¹¹ *In the Matter of the Application by Minnesota Power for Authority to Increase Rates in the State of Minnesota*, Docket No. E-015/GR-23-155, ORDER SETTING INTERIM RATES at 2 (Dec. 19, 2023) (referencing OAG Comments at 2-3 (Nov. 13, 2023)).

¹² *In the Matter of the Application of CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Rates for Natural Gas Utility Service in Minnesota*, Docket No. G-008/GR-23-173, ORDER SETTING INTERIM RATES at 3 (Dec. 28, 2023) (referencing OAG Comments at 1-3 (Nov. 13, 2023)).

¹³ *In the Matter of the Application of Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-21-630, ORDER SETTING INTERIM RATES at 6-8 (Dec. 23, 2021); *In the Matter of the Application by Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-015/GR-21-335, ORDER SETTING INTERIM RATES at 5 (Dec. 30, 2021); *In the Matter of the Application by CenterPoint Energy Resources Corp. d/b/a CenterPoint Energy Minnesota Gas for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G-008/GR-21-435, ORDER SETTING INTERIM RATES at 4-5 (Dec. 30, 2021).

¹⁴ *In the Matter of the Application of Minnesota Power for Authority to Increase Rates for Electric Service in Minnesota*, Docket No. E-015/GR-09-1151, ORDER SETTING INTERIM RATES at 3 (Dec. 30, 2009).

¹⁵ Tom Akaolisa, *Gov. Walz Orders Full November SNAP Benefits Restored for 440,000 Minnesotans After Court Order Amid Federal Shutdown Uncertainty*, MINNEAPOLIMEDIA (Nov. 10, 2025), <https://minneapolimedia.town.news/g/coon-rapids-mn/n/348893/gov-walz-orders-full-november-snap-benefits-restored-440000-minnesotans>.

¹⁶ CUB Comments at 4.

OTP also voluntarily agreed to waive its statutory right and allow for a longer period to review its rate request after conferring with the Department and OAG.¹⁷ By operation of law, OTP is not permitted to collect the amount by which final rates exceed interim rates during this lengthened review period.¹⁸ Rising inflation (as noted by the Department)¹⁹ impacts consumers and businesses, including OTP.²⁰ Maintaining an arbitrary level of interim rates that have no basis in cost or economics, and increasing the risk of under-recovery, after OTP voluntarily agreed to extend the review period for this case, is neither just nor reasonable.

Finally, OTP has concerns with potential complications associated with the Department's proposal to limit the interim rate revenue requirement reduction to only Residential customers.²¹ This approach was utilized in Xcel Energy's 2021 electric rate case and posed challenges during the interim rate refund process.²² Any class-specific change to interim rates would need to be implemented in a manner that does not result in OTP under-collecting the ultimate interim rate revenue deficiency. This is another reason to follow the statutory interim rate framework.

The primary circumstance identified by the Department and CUB – the federal government shutdown – no longer exists and does not constitute exigent circumstances. Even if the now-finished shutdown justified exigent circumstances – which it does not – neither CUB or the Department has provided any evidence to demonstrate how interim rates should be set in

¹⁷ OTP Filing Letter at 1 (Oct. 31, 2025).

¹⁸ Minn. Stat. § 216B.16, subd. 3.

¹⁹ Department Comments at 6.

²⁰ See, e.g., *In the Matter of the Application by Minnesota Power for Authority to Increase Rates in the State of Minnesota*, Docket No. E-015/GR-23-155, ORDER SETTING INTERIM RATES at 2 (Dec. 19, 2023) (referencing OAG Comments at 3 (Nov. 13, 2023)) (rejecting the OAG's argument that a combination of factors including "[m]ultiple recent years of compounding inflation" supported a finding of exigent circumstances); *In the Matter of the Application of Northern States Power Company for Authority to Increase Rates for Natural Gas Service in Minnesota*, Docket No. G-002/GR-23-413, ORDER SETTING INTERIM RATES at 2 (Dec. 22, 2023) (referencing OAG Comments at 3 (Nov. 13, 2023)) (rejecting the OAG's argument that a combination of factors including inflation supported a finding of exigent circumstances).

²¹ Department Comments at 6.

²² When calculating interim rate refunds, the Commission found that, as a result of the interim rate revenue requirement reduction to only Residential customers, "[a]pplying a standard refund factor to all customer classes, although straightforward, would result in refund dollars shifting from the non-Residential classes to the Residential class, meaning the non-Residential classes would receive a smaller interim rate refund than they would have absent the finding of exigent circumstances". To avoid shifting refund dollars from the non-Residential class, the Commission used the customer cost allocations from the Company's last rate case to calculate refunds. This ensured that "refund dollars are not unreasonably shifted from the non-Residential classes to the Residential class". *In the Matter of the Application by Northern States Power Company d/b/a Xcel Energy for Authority to Increase Rates for Electric Service in the State of Minnesota*, Docket No. E-002/GR-21-630, ORDER APPROVING COMPLIANCE FILING AND ADOPTING METHODOLOGY at 5-6 (Jan. 25, 2024).

response to an exigency. Both recommendations are arbitrary, and not supported by substantial evidence.²³ The absence of cost or economic basis presents very real financial risks to OTP, particularly when coupled with the voluntary extension of the time to review this case. For all the reasons discussed above, OTP requests the Commission reject the recommendations of the Department and CUB and authorize interim rates as proposed by OTP.

3. Coyote Station Costs (OAG)

The OAG contends that interim rates should not include Coyote Station depreciation costs that would otherwise be collected after December 31, 2031, the date the Commission has ordered OTP end all collection of Coyote Station costs from Minnesota customers. In OTP's last Integrated Resource Plan, the Commission made the following order related to Coyote Station:

Immediately following the order, Otter Tail shall, in a reasonable and prudent fashion, commence activities to remove all jurisdictional allocations to its Minnesota ratepayers for Coyote Station, such that it will no longer serve Minnesota customers, either through a sale, jurisdictional realignment or other means that ends all Minnesota ratepayer obligations for the plant, coal contracts and associated facilities as soon as feasible but no later than December 31, 2031. Otter Tail shall make quarterly filings from the date of this order with the Commission in this docket and in their next IRP filing on May 15, 2026, regarding the progress of efforts to remove Minnesota ratepayers from any obligation for the plant, coal contracts, and associated facilities. Regardless of a sale, jurisdictional realignment, or other arrangement, Otter Tail will no longer utilize Coyote Station to serve Minnesota customers beyond December 31, 2031.²⁴

Minnesota customers will not be served by, and will not pay for, Coyote Station after December 31, 2031. This decision will require changes to the way that Coyote Station costs are handled, and OTP proposes to begin that process in this case. Specifically, OTP proposes that the depreciation expense that would otherwise have been recovered from Minnesota customers after December 31, 2031 should be amortized and collected before December 31, 2031.

²³ *Matter of Quantification of Env't Costs*, 578 N.W.2d 794, 801 (Minn. Ct. App. 1998) ("the parties bear the burden of establishing their position to the agency").

²⁴ *In the Matter of Otter Tail Power's 2023–2037 Integrated Resource Plan*, Docket No. E017/RP-21-339, Order Modifying Otter Tail Power's 2023-2037 Integrated Resource Plan at Order Point 4 (July 22, 2024) (2021 IRP Order).

The OAG argues that these expenses should be excluded from interim rates because they are not “the same in nature and kind as those allowed by a currently effective order of the commission” in OTP’s last rate case.²⁵ The OAG is not correct. Minnesota law provides that utilities are to recover “depreciation of its utility property used and useful in rendering service to the public, and to earn a fair and reasonable return upon the investment in such property.”²⁶ Depreciation associated with Coyote Station has been part of OTP’s rates for over 40 years, and will continue to be part of OTP’s rates following the conclusion of this case. The OAG admits as much by acknowledging “Otter Tail has collected Coyote Station depreciation expense for many years”.²⁷

Notably, the Department did not reach the same conclusion as the OAG, instead finding no rate base or expense items that should have been excluded.²⁸ The Department is correct: these Coyote Station costs are “the same in nature and kind” as other depreciation expense, and therefore are appropriately part of the interim test year revenue requirement.

The depreciation collected from customers would provide for full return of Coyote Station investment in 2041.²⁹ The Commission, however, directed that OTP “*immediately* ... commence activities to remove all jurisdictional allocations to its Minnesota ratepayers for Coyote Station ... that ends all Minnesota ratepayer obligations for the plant, coal contracts and associated facilities as soon as feasible but no later than December 31, 2031.”³⁰ OTP’s interim and final rate proposals do just that: effective with interim rates, OTP would begin collecting the amount of depreciation that otherwise would be collected after December 31, 2031, so that by December 31, 2031, OTP will have collected the Minnesota jurisdictional share of all depreciation for Coyote Station.

There is no question that the Coyote Station undepreciated balance is depreciation: again, the OAG admits as much.³¹ But the OAG attempts to create a distinction where none exists, characterizing the undepreciated

²⁵ OAG Comments at 1 (quoting Minn. Stat. § 216B.16, subd. 3).

²⁶ Minn. Stat. §216B.16, subd. 6.

²⁷ OAG Comments at 3.

²⁸ Department Comments at 5.

²⁹ Ex. OTP-4 at 14-16 (Olsen Direct). *See also* Minn. R. 7825.0500, subp. 7 (“‘Depreciation accounting’ means a system of accounting which aims to distribute cost or other basic value of tangible capital assets, less salvage, if any, over the estimated useful life of the unit, which may be a group of assets, in a systematic and rational manner.”).

³⁰ 2021 IRP Order at Order Point 4 (emphasis added).

³¹ OAG Comments at 3.

balances as “not just any old depreciation expense....”³² In fact, the Coyote Station undepreciated balance is just that – depreciation to be collected after December 31, 2031 and therefore clearly “the same in nature and kind as those allowed by a currently effective order of the commission” and appropriately part of the interim rate revenue requirement.

In contrast, OTP has not previously collected Coyote Station fuel supply agreement exit costs,³³ and OTP affirmatively excluded such costs from interim rates.³⁴ Further, Coyote Station fuel supply agreement exit costs are being collected through final rates as a reserve, not as a return of investment, and will be returned to customers if Coyote Station continues to operate past December 31, 2031.³⁵ It is entirely reasonable to treat these two categories of Coyote Station costs differently for purposes of interim rates.

Finally, the OAG does not consider the practical consequences associated with its recommendation. The Commission ordered OTP to *immediately* take action that ends all Minnesota ratepayer obligations for Coyote Station by December 31, 2031. The OAG, instead, recommends delaying action, presumably until final rates. Doing so eliminates approximately 18 months of collection, leaving less time to comply with the 2021 IRP Order and increasing final rates by approximately \$1.1 million (OTP MN).³⁶ The Commission should reject the OAG’s recommendation regarding undepreciated plant balance for Coyote Station and include these costs in the interim test year revenue requirement.

B. Intervention (CUB)

OTP takes no position on CUB’s request to intervene in this case.³⁷ We do, however, present the following for the Commission’s consideration. First, OTP is a very small utility, with approximately 63,000 customers in Minnesota. To the extent CUB seeks to be compensated for its participation, the cost is born by those 63,000 customers. CUB’s intervenor compensation can reach \$75,000,³⁸ or approximately \$1.20 for each OTP customer. Therefore, the financial impact is much different for OTP’s customers than is the case for larger utilities in Minnesota, some of which have close to 20 times more customers.

³² OAG Comments at 3.

³³ OAG Comments at 3.

³⁴ Ex. OTP-4 at 16 (Olsen Direct).

³⁵ Ex. OTP-4 at 17 (Olsen Direct).

³⁶ Ex. OTP-4 at 13-14 (Olsen Direct).

³⁷ CUB Comments at 6-7.

³⁸ Minn. Stat. § 216B.631, subd. 4.

Second, CUB also has sought to intervene in Xcel Energy’s pending natural gas rate case.³⁹ In that case, CUB presented the same arguments regarding exigent circumstances, practically verbatim. An example is provided below.

CUB Comments OTP Rate Case	CUB Comments Xcel Energy Rate Case
<p><i>i. The shutdown of the federal government warrants a finding of exigent circumstances.</i></p> <p>By law, the Commission must consider “ability to pay” when setting utility rates, including interim charges.¹⁵ As CUB has explained in other contexts, customers’ ability to pay for utility services is impacted not only by the price of electricity, but also by factors such as income, household size, nondiscretionary expenditures, and the availability of assistance resources.¹⁶ Since the beginning of October, the shutdown of the federal government has inflicted significant and continuing harms on federal workers, income-limited households, and other residential and business customers throughout Otter Tail’s service territory. Even as Congress advances efforts to reopen the government, millions of Americans will continue to suffer the effects of the longest shutdown in history.¹⁷ These economic and financial consequences warrant a finding of exigent circumstances as they threaten customers’ ability to pay for utility services both now and in the future.</p>	<p><i>i. The shutdown of the federal government warrants a finding of exigent circumstances.</i></p> <p>By law, the Commission must consider “ability to pay” when setting utility rates, including interim charges.¹⁰ As CUB has explained in other contexts, customers’ ability to pay for utility services is impacted not only by the price of electricity, but also by factors such as income, household size, nondiscretionary expenditures, and the availability of assistance resources.¹¹ Since the beginning of October, the shutdown of the federal government has inflicted significant and continuing harms on federal workers, income-limited households, and other residential and business customers throughout Xcel’s service territory. Even as Congress advances efforts to reopen the government, millions of Americans will continue to suffer the effects of the longest shutdown in history.¹² These economic and financial consequences warrant a finding of exigent circumstances as they threaten customers’ ability to pay for utility services both now and in the future.</p>

This duplication raises two concerns. First, if CUB is presenting material that is equally applicable to OTP and its unique service territory as it is to Xcel Energy and its unique service territory, it is not clear that full intervenor status is required. CUB also has no history of participating in OTP’s rate cases. It is not clear that CUB has the familiarity with OTP’s service territory and customers to meaningfully participate in the case, or has interests that are sufficiently distinct from public interest intervenors like the Department and the OAG justifying intervention.⁴⁰

Second, CUB presumably will seek intervenor compensation in the Xcel Energy natural gas rate case too. If CUB presents the same material in both cases (as it did with its initial comments), it seems unreasonable for it to be compensated by both OTP’s customers and those of Xcel Energy.

³⁹ *In the Matter of the Application of Xcel Energy’s Petition for Authority to Increase Natural Gas Rates in Minnesota*, Docket No. G002/GR-25-356, Initial Comments of the Citizens Utility Board of Minnesota at 6-7 (Nov. 12, 2025).

⁴⁰ Minn. R. 7829.0800.

C. Email Notice (CUB)

CUB suggests OTP should provide customers with electronic notice of our application.⁴¹ If the Commission believes this is appropriate, OTP can provide a copy of the notice that is being used for general publication to those customers with email on file.

Dated: November 17, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
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By: /s/ PATRICK T. ZOMER

Patrick T. Zomer Atty. Reg. No. 392555
Moss & Barnett, P.A.
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Minneapolis, MN 55402
(612) 877-5000

⁴¹ CUB Comments at 7.

Docket No. E017/GR-25-359

Attachment 1

MN Uplift Program Rider Tariff 13.07

Redline and Clean Versions



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
Section 13.07
ELECTRIC RATE SCHEDULE
Uplift Program Rider

Page 3 of 3
~~Second~~ Third Revision

8. Refusal or failure of a Customer to provide documentation of eligibility acceptable to the Company may result in Customer removal from the Uplift Program.
9. Retention reviews of Uplift customers will be completed in September to ensure customers have been approved for LIHEAP benefits. Uplift participants who have been approved for LIHEAP will be automatically re-enrolled in the Uplift Program for the next year. Customers who have not been approved for LIHEAP will be removed from the Program and can reapply for the Uplift credit after October 1.
10. Applications for the Uplift Program will be reviewed in the order they are received. Because funding is restricted to the amount received from the surcharge, the number of bill credits available each year will also be limited. When funding for the program year is projected to be claimed in full by the participants, no other applications will be approved until funding becomes available due to participants becoming ineligible or voluntarily withdrawing from the Program.
11. An eligible Uplift customer receives a credit on each monthly bill according to the chart below. Credits applied shall not exceed the current monthly bill.

TIER	ANNUAL USAGE	<u>MONTHLY CREDIT</u> <u>January 1 – April 30, 2026</u>	<u>MONTHLY CREDIT</u> <u>May 1, 2026, and thereafter</u>
Tier 1	=>12000 kWh Annually	\$60	\$40
Tier 2	> 7500 and < 12000 kWh Annually	\$37.50	\$25
Tier 3	<=7500 kWh Annually	\$22.50	\$15

12. This Uplift Program Rider shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low-income affordability programs.

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

MINNESOTA PUBLIC
UTILITIES COMMISSION
Approved: March 4, 2025
Docket No. E017/M-24-436GR-25-359

~~Bruce G. Gerhardson~~ Stuart D. Tommerdahl
~~Vice President~~ Manager,
~~Regulatory Affairs~~ Regulation & Retail Energy Solutions

EFFECTIVE with bills rendered on and after September-January 1, 2025 2026
in Minnesota



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
Section 13.07
ELECTRIC RATE SCHEDULE
Uplift Program Rider

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Third Revision

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12. This Uplift Program Rider shall meet the conditions of Minnesota Statutes, Chapter 216B.16, Subd. 15 on low-income affordability programs.

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 rider. 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 Application of Otter Tail Power Company for
Authority to Increase Rates for Electric Service in Minnesota
Docket No. E017/GR-25-359**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman 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
Reply Comments**

Dated this 17th day of **November 2025**.

/s/ KIM WARD

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Tim	Miller	tim.miller@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	GR-25-359
29	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25-359
30	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	GR-25-359
31	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	GR-25-359
32	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	GR-25-359
33	Rate Case Inbox	Rate Case Inbox	mnratescase@otpc.com	Otter Tail		null null, null United States	Electronic Service		No	GR-25-359
34	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	GR-25-359
35	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	GR-25-359
36	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	GR-25-359
37	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN, 55423 United States	Electronic Service		No	GR-25-359
38	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	GR-25-359
39	William	Taylor	bill.taylor@taylorlawsd.com	Taylor Law Firm		4820 E. 57th Street Suite B Sioux Falls SD, 57108 United States	Electronic Service		No	GR-25-359
40	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	GR-25-359
41	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN,	Electronic Service		No	GR-25-359

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55435 United States				
42	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	GR-25- 359
43	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	GR-25- 359
44	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	GR-25- 359