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July 13, 2020

Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

**RE: In the Matter of Otter Tail Power Company's 2019 Demand Side Management
Financial Incentive Project and Annual Update to Conservation Improvement Rider
Docket No. E017/M-20-451
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail or the Company) submits these Reply Comments in response to July 1, 2020 Comments by the Minnesota Department of Commerce, Division of Energy Resources (Department). Otter Tail agrees with the Department's recommendation to approve Otter Tail's Petition in this docket. Otter Tail requests the Minnesota Public Utilities Commission (MPUC) approve the requests made in the Company's Petition and recommendations by the Department as follows:

1. approve a DSM financial incentive of \$2,718,378 for Otter Tail's 2019 achievements,
2. approve Otter Tail's 2019 CIP tracker account, resulting in a December 31, 2019 tracker balance of \$3,955,955,
3. approve a CCRA of \$0.00485 per kWh, to be effective October 1, 2020,
4. grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) and a variance to Minnesota Rules part 7825.2600 for one year after the issue date of the Commission's Order in the present docket, and
5. require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

The Department also requests, in future filings for Otter Tail to, “provide live spreadsheets of both the projected tracker and the prior year’s tracker, including in both monthly values for sales data, CIP expenses, carrying charges, effective CCRC and CCRA rates, and CCRC versus CCRA revenues, and beginning and ending tracker balances.” Otter Tail agrees to this request and will provide “live spreadsheets” in future CIP filings.

Otter Tail has electronically filed this document with the Commission. A Summary of the filing has been served on all persons on Otter Tail’s general service list. A Certificate of Service is also enclosed.

Please feel free to contact me at 218-739-8639 or jgrenier@otpc.com with any questions.

Sincerely,

/s/ JASON GRENIER
Jason Grenier, Manager
Market Planning

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Enclosures
By electronic filing
C: Service List