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January 22, 2020

Mr. Ryan Barlow
Acting Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**Re: *In the Matter of Otter Tail Power's 2019 Integrated Distribution System Plan*
MPUC Docket No. E-017/M-19-693**

Dear Mr. Barlow:

The Office of the Attorney General—Residential Utilities Division (“OAG”) submits this Comment in response to the Public Utilities Commission’s (“Commission”) November 19, 2019 Notice of Comment Period issued in the above-captioned docket.

The Commission’s February 20, 2019 Order Adopting Integrated-Distribution-Plan Filing Requirements and corresponding attachments pertinent to the individual utilities, clarified that the “Commission review of annual distribution system plans . . . [is not] a prudency determination of any proposed system modifications or investments.”¹ Because the Commission “generally decides cost recovery on a case-by-case basis,” the OAG recommends that any approval of Otter Tail Power Company’s Integrated Distribution Plan (“IDP”) expressly note that such approval is not an implicit advanced determination of prudence with regard to the constituent proposals contained within the IDP. *Cf. In the Matter of a Commission Inquiry into Electric Vehicle Charging and Infrastructure*, Docket No. E-999/CI-17-879, Minnesota Power’s Reply Comments at 4 (August 12, 2019) (acknowledging that any Commission approval of the

¹ *In the Matter of Distribution System Planning for Otter Tail Power Company*, Docket No. E-15/CI-18-253, Order Adopting Integrated-Distribution-Plan Filing Requirements at Attachment governing Minnesota Integrated Distribution Planning Requirements for Otter Tail Power Company (Feb. 20, 2019).

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utilities' Transportation Electrification Plans "does not constitute an advanced determination of prudence").

Sincerely,

s/ **Max Kieley**

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