

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

October 8, 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 Otter Tail Power Company's 2022-2036 Integrated
Resource Plan
Docket No. E017/RP-21-339
Response**

Dear Ms. Bergman:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) our response to the Notice of Special Commission Agenda Meeting issued July 18, 2025, Otter Tail is pleased to submit Midcontinent Independent System Operator (MISO)'s Relevant Electric Retail Regulatory Authority (RERRA) Verification Forms and accompanying documentation for the Potential Wind Project (the Project).

Project

The Project would be a 200 MW wind project in Otter Tail's service territory. While negotiations are confidential and ongoing, Otter Tail and the Developer are discussing the transfer of the wind resource via power purchase agreement and asset purchase. This project meets the resource adequacy and reliability needs identified in the Company's approved 2021 Integrated Resource Plan. The Company has identified this Project as a front-runner for selection in the procurement process. ERAS will help expedite this process and bring low-cost generation to our customers in a timely manner. The Developer would submit the ERAS application for the Project.

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 218-739-8989 or njensen@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ NATHAN JENSEN
Nathan Jensen
Manager, Resource Planning

kaw
Enclosures
By electronic filing
c: Service List

RERRA Verification Form

Instructions: This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. The use of this form is not required, and the representative of the applicable RERRA may submit other forms of written verification to MISO.

1. I, [Name of RERRA Official], am the [Title] of the [RERRA].
2. I am completing this informational form on behalf of the [RERRA] and I am confirming that the generation facility identified in the Interconnection Request application should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed. I am verifying to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:

☐ A state energy forecast, or other forward-looking forecast;

☐ The commencement of a state proceeding; [Insert Brief Description of Proceeding]

X Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;

Pursuant to the Integrated Resource Plan filed by Otter Tail Power on 9/1/2021 in docket RP-21-339, the Minnesota Public Utilities Commission issued and directed Otter Tail Power to procure no less than 150 MWs and up to 200 MWs of wind resources with a commercial operation date of December 31, 2029 or as soon as practicable thereafter per the 7/22/2024 Order.

☐ Response to a Request for Proposals (RFP); or [Attach RFP Information or Insert Brief Description]

☐ Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).

[Insert Brief Description]

3. Given the facts above in paragraph 2, the [RERRA] acknowledges that the [Project Applicant’s Resource Name] is a candidate for study under MISO’s Expedited Resource Addition Study process.
4. At this time, the [RERRA] [has/has not] completed its formal regulatory reviews of [Project Applicant’s Resource Name].

☐ Not Applicable in [State].

5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the [RERRA]'s required procedures. Nothing within this form constitutes an indication, approval, or certification by the [RERRA] that the [Project Applicant's Resource Name] is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

[Name of RERRA Official]
[RERRA]
[Title]
[Address]
[Phone
Number]
[Email]

Date: _____ Signature: _____

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2022-2036 Integrated
Resource Plan
Docket No. E017/RP-21-339**

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
Response**

Dated this **8th** day of **October, 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
15	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	21-33921-339
16	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	21-33921-339
17	Nathan	Jensen	njensen@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	21-33921-339
18	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-33921-339
19	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	21-33921-339
20	William	Kenworthy	will@votesolar.org			1 South Dearborn St Ste 2000 Chicago IL, 60603 United States	Electronic Service		No	21-33921-339
21	Kate	Knuth	kate.knuth@gmail.com			2347 14th Terrace NW New Brighton MN, 55112 United States	Electronic Service		No	21-33921-339
22	Randy	Kramer	rlkramer89@gmail.com	Water and Soil Resources Board		42808 Co. Rd. 11 Bird Island MN, 55310 United States	Electronic Service		No	21-33921-339
23	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	21-33921-339
24	Eric	Lindberg	elindberg@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 Saint Paul MN, 55104-3435 United States	Electronic Service		No	21-33921-339
25	Alice	Madden	alice@communitypowermn.org	Community Power		2720 E 22nd St Minneapolis MN, 55406 United States	Electronic Service		No	21-33921-339
26	Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	21-33921-339
27	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	21-33921-339
28	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	21-33921-339

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
29	Debra	Opatz	dopatz@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	21-33921-339
30	Kevin	Pranis	kpranis@liunagroc.com	Laborers' District Council of MN and ND		81 E Little Canada Road St. Paul MN, 55117 United States	Electronic Service		No	21-33921-339
31	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	21-33921-339
32	Stephan	Roos	stephan.roos@state.mn.us		Minnesota Department of Agriculture	625 Robert St N Saint Paul MN, 55155-2538 United States	Electronic Service		No	21-33921-339
33	Nathaniel	Runke	nrunke@local49.org			611 28th St. NW Rochester MN, 55901 United States	Electronic Service		No	21-33921-339
34	John	Saxhaug	john_saxhaug@yahoo.com			3940 Harriet Ave Minneapolis MN, 55409 United States	Electronic Service		No	21-33921-339
35	Bria	Shea	bria.e.shea@xcelenergy.com	Xcel Energy		414 Nicollet Mall Minneapolis MN, 55401 United States	Electronic Service		No	21-33921-339
36	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	21-33921-339
37	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		Yes	21-33921-339
38	Amelia	Vohs	avohs@mncenter.org	Minnesota Center for Environmental Advocacy		1919 University Avenue West Suite 515 St. Paul MN, 55104 United States	Electronic Service		Yes	21-33921-339
39	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	21-33921-339
40	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	21-33921-339