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May 3, 2024

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

PUBLIC DOCUMENT – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED

RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Update to its Electric Utility Infrastructure Rider, Rate Schedule 13.11
Docket No. E017/M-24-
Initial Filing

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) submits the attached Petition to the Minnesota Public Utilities Commission (Commission) for approval its annual update to the Electric Utility Infrastructure Cost Recovery Rider under Otter Tail's Rate Schedule 13.11.

Attachment 14 is the live version of Otter Tail's Electric Utility Infrastructure Cost Recovery Tracker ("the Model"), which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. The Model therefore is (1) "trade secret information", as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A). To be clear, OTP is not requesting that the data used in the Model be treated as "trade secret information" or protected data. Instead, OTP is requesting that the live version of the Model be treated as trade secret information and protected data.

On page thirteen of the Initial Filing Petition there is information regarding ongoing contractual negotiations with a vendor, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. The Model therefore is (1) "trade secret information", as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

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.

If you have any questions regarding this filing, please contact me at 218-739-8313 or at eketelsen@otpco.com.

Sincerely,

/s/ EMILY KETELSEN
Rates Analyst
Regulatory Economics

lcd
Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's Petition to Implement Tracker Recovery for Advanced Metering Infrastructure / Outage Management System / Demand Response System, Rate Schedule 13.11	**Docket No. E017/M-24-** **SUMMARY OF FILING**

On May 3, 2024, Otter Tail Power Company (Otter Tail) filed this Petition with the Minnesota Public Utilities Commission for approval of its Electric Utility Infrastructure Cost (EUIC) Rider Annual Update under Otter Tail's rate schedule 13.11. Pursuant to Minn. Stat. §216B.1636 (Recovery of Electric Utility Infrastructure Costs), Otter Tail is requesting recovery of updated costs associated with the Advanced Metering Infrastructure and Outage Management Systems, and a determination that costs associated with the new Demand Response System project are eligible for rate recovery through Otter Tail's EUIC Recovery Rider.

STATE OF MINNESOTA
BEFORE THE
PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Update to its Electric Utility Infrastructure Rider, Rate Schedule 13.11	**Docket No. E017/M-24-** **PETITION**

I. FILING SUMMARY

A. This filing for Otter Tail Power Company's (Otter Tail or Company) Electric Utility Infrastructure Cost (EUIC) recovery rider includes annual updated actual and forecasted costs and collections associated with the following:

1. Advanced Metering Infrastructure (AMI) with adjustment to remove sales tax from meters and related equipment.
2. An Outage Management System (OMS) with Geographic Information System (GIS) Updates.
3. The addition of a new Demand Response (DR) system project.
4. Annual Operating and Maintenance (O&M) net savings related to AMI implementation.

B. The Minnesota projected revenue requirement for the recovery period of January 1, 2025, through December 31, 2025, is $4,563,521.

C. The EUIC rider maintains a per meter rate design.

D. The proposed rate is an increase from the last filing. A residential customer with one meter will see a monthly bill increase of $1.31.

II. INTRODUCTION

Otter Tail respectfully submits this Petition to the Commission for an Order approving the 2024 adjustment to its EUIC recovery rider for AMI, OMS with GIS, and the inclusion of the new DR system. The Petition is filed pursuant to Otter Tail's approved EUIC Rate Schedule 13.11, which was originally approved by the Commission on August 4, 2022, in Docket No. E-017/M-21-382. This is the second update for the EUIC Rider. This filing also includes the annual report on grid modification investments as ordered by the Commission in the Docket No. E-017/M-21-382 Order.

III. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, Subp. 1, a one-paragraph summary of the filing accompanies this Petition.

IV. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, Subp. 3, the following information is provided.

A. Name, address, and telephone number of utility

(Minn. Rules 7829.1300, Subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney

(Minn. Rules 7829.1300, Subp. 3(B))

Lauren D. Donofrio
Senior Associate General Counsel – Regulatory
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C. Date of filing and proposed effective date of rates

(Minn. Rules 7829.1300, Subp. 3(C))

The date of the filing is May 3, 2024. Otter Tail proposes the updated EUIC rider rates become effective January 1, 2025, or on the first day of the month following Commission approval, should its decision be thereafter.

D. Statutes controlling schedule for processing the filing

(Minn. Rules 7829.1300, Subp. 3(D))

This filing is a "miscellaneous tariff filing" as defined by the Commission's rules at Minn. Rules 7829.0100, Subp. 11. No determination of Otter Tail's overall revenue requirement is necessary (or required under the Statute). Minn. Rules 7829.1400, Subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter.

E. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, Subp. 3(E))

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F. Impact on rates and services

(Minn. Rule 7829.1300, Subp 3(F))

The proposed EUIC Rider update includes recovery for AMI, OMS, and DR investments occurring outside of the general rate case and therefore does not have an effect on Otter Tail's current base rates. The additional information required under Minn. Rule 7829.1300, Subp 3(F) is included throughout this Petition.

G. Service List

(Minn. Rules 7829.0700)

Otter Tail requests that the following persons be placed on the Commission's official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail:

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H. Service on other parties

(Minn. Rules 7829.1300, Subp. 2)

Pursuant to Minn. Rules 7829.1300, Subp. 2, Otter Tail e-Files this Petition on the Minnesota Department of Commerce (Department), Division of Energy Resources and the Office of Attorney General – Residential Utilities and Antitrust Division. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, Subp. 1 was served on all parties on Otter Tail's general service list.

V. DESCRIPTION AND PURPOSE OF FILING

A. Introduction

In 2021, Otter Tail made its initial request for the establishment of the EUIC rider for recovery of AMI, OMS with GIS Project, and the DR system replacement. Ultimately, the AMI and OMS Projects were approved, and the DR project request was withdrawn by Otter Tail in agreement with the Department. The EUIC rate went into effect September 1, 2022, and this filing is the second annual update to the EUIC.

Otter Tail requests the continuation of the EUIC recovery mechanism as costs are incurred for the AMI, OMS, and DR projects outside of a general rate case. As directed in the previous EUIC Commission Order in Docket No. E-017/M-21-382, Otter Tail provides project updates, information on grid modernization investments, and its

integrated distribution plan, as well as Otter Tail's proposed metrics for the Commission approved AMI and OMS projects. [1]

B. Overview of Projects Included in this Filing

This section contains updated information on the two projects that were previously approved by the Commission for EUIC recovery and new information regarding the DR project included in this filing.

1. Advanced Metering Infrastructure (AMI)

The original implementation plan for the AMI project anticipated business process development, system integration, and initial deployment to occur in late 2021 through the fourth quarter of 2022, with full deployment from late 2022 to the third quarter 2024. The deployment schedule delay due to the integration requirements of the software systems and the associated testing challenge was discussed in the previous filing.[2] The AMI pilot of approximately 500 meters occurred in December 2023. Full meter deployment started in mid-February 2024 and will continue throughout the year. While it is anticipated that most AMI meters will be installed by the end of 2024, there will be some AMI meter installations occurring in the first quarter of 2025. Allegiant Utility Services, Otter Tail's meter installation contractor, plans to complete the contracted portion of the installations in 2024, which represents approximately 91 percent of the total meter installations. The remaining meters, which represent meters associated with complex rates, complexity of metering configurations, and heightened impact to customer processes will be installed by Otter Tail employees. Allowing Otter Tail staff to manage these meter exchanges will reduce delays for Allegiant Utility Services and allow for a more coordinated exchange process for this customer group, which includes larger commercial and industrial loads.

Otter Tail's actual cost through 2023 for the AMI project is $19.9 million. The projected total spend on the project is $56.0 million, which is slightly over the $55.9 million approved amount. Actual costs through 2024 are projected to remain under the $55.9 million soft cap.

Because full deployment of AMI began in February 2024, Otter Tail has not yet realized any O&M savings. Otter Tail estimates that approximately 25 percent of total expected annual savings will be realized in 2024, 75 percent in 2025, and nearly 100 percent expected savings will begin in 2026. Minnesota customers will

[1] Docket No. E-017/M-21-382 Final Order August 4, 2022, ordering point 10.
[2] Docket No. E-0117/M-23-131.

receive a credit for O&M savings of meter reading expenses that are included in base rates, as shown in Attachment 8.

2. Outage Management System (OMS)

a. OMS Update on Scope

Otter Tail's OMS offers many operational and customer benefits related to outage response as well as a foundation that will be beneficial in future grid modernization plans. The OMS allows Otter Tail to identify outages more rapidly and deploy crews more efficiently to reduce the number and length of outages. It also allows Otter Tail to better communicate with customers before, during, and after outage events by sending outage notifications, updates on estimated time of restoration, and restoration notices. Outage notifications were enhanced with the implementation of the Customer Experience Portal (CEP) in August of 2023 and for those customers who have signed up to receive notifications.

The implementation of AMI will enhance the speed in which the OMS receives outage information and, therefore, improve restoration times even further. The individual meters will provide power-off and power-on notifications to be utilized by the OMS. Otter Tail is currently working with the vendors to complete the necessary integrations and anticipates completion by late 2024 or early 2025.

b. OMS Update on Implementation Progress

The GIS update portion of the OMS project is nearing completion and is expected to be finished by May of 2024. The first phase of the OMS installation was completed in December 2022. The final go-live improvements to the OMS system, including modeling improvements as part of the GIS portion of the project, were completed in February of 2024. Since project completion, these items have improved available outage and restoration information and communications.

The next stage of OMS development ties closely with the installation of the advanced meter infrastructure and the new CEP. Meters included in the pilot were installed in December 2023. Full meter deployment began in February 2024 and will continue through early 2025. Together, OMS, CEP, and AMI will improve the customer experience featuring two-way communication for service outages and speeding up the restoration process. The CEP system allows customers to receive communication based on their preferences and

will give customers the ability to sign up for outage and estimated restoration notifications that pertain specifically to their service.

c. OMS Update on Actual Costs and Savings

Total OMS with GIS project cost through 2023 is $3.1 million. The projected total spend on the project is $3.7 million (OTP Total) / $1.8 million (OTP MN). The $1.8 million is under the $2.0 million soft cap for the Minnesota jurisdictional share.

3. Demand Response System (DR)

Otter Tail's DR programs are core offerings to Otter Tail's 133,000 customers. Nearly one-third of Otter Tail customers participate in DR programs, which totaled over $43.5 million (OTP Total) / $16.8 million (OTP MN) in energy revenue in 2022.

The Company offers nine DR customer rate options in each of the three states it serves. These programs provide flexibility for the Company in managing the grid, cost savings for participating residential, commercial, and industrial customers, and ultimately reduce the need for generation resources, which produces savings for all customers. This program is a true collaboration between the Company and its customers.

Through strong customer engagement, Otter Tail has built a robust DR portfolio with its earliest programs dating back to the 1970s. Otter Tail customers have invested in water heating, heating, and cooling technologies that provide the Company with substantial DR capabilities, making Otter Tail's DR portfolio one of the top ten percent of US investor-owned utility DR programs, as reported in a 2019 Brattle Group report. This allows Otter Tail to control between 10-15 percent of total winter peak load.

In addition to reducing overall system capacity needs and energy costs, which lower overall system energy and fuel costs for all customers, the programs also add efficiencies to the grid, keeping the Company's rates among the lowest in the country.

In general, the Company's DR system shifts or reduces load when called upon by activating Load Control Devices (LCDs) located at customer homes and businesses. In return for the ability to reduce load in this way, the Company offers participating customers a lower rate. The ability to reduce load provides reliability benefits for the grid by offering an additional tool to address high-demand situations. Customers can reduce their bills by taking advantage of Time-of-Use (TOU) rates, which match customer electric use with the pricing of electricity at

defined times of day, thereby encouraging customers to shift electric use to times when energy is more affordable to provide. Other benefits include avoided capacity additions and purchases, avoided energy market and transmission costs, frequency regulation, and system protection under emergency conditions.

Another benefit provided by the DR program is the ability to economically assess the cost of serving load in organized electricity markets. The Company can choose to either buy the energy at market cost or interrupt customers during periods of high prices. Due to this ability to control load, Otter Tail also receives capacity accreditation from the Midcontinent Independent System Operator, Inc. (MISO) for the amount of interruptible load on the Company's system, fulfilling a portion of the Company's annual capacity requirement set by MISO under Module E of the MISO Open Access Transmission, Energy, and Operating Reserve Markets Tariff. Maintaining and expanding the Company's DR program will ensure its ability to continue to reduce overall system energy and fuel costs for customers into the future.

Otter Tail procured its current DR platform of devices and software in 2003. The Company's DR program currently consists of a one-way network paging system for communication to LCDs in the field through Remote Transmitter Controllers, and Repeaters. A Palm Pilot is used to program the hardware in the field. Through this network, a software platform interfaces with customers' devices and directs reductions in load during peak transmission billing periods, high energy cost periods in the organized markets, and emergency events as a capacity resource.

Now, more than 20 years later, this legacy system is technologically obsolete. The software is running unsupported from the vendor. Several hardware components of the DR system are no longer available for purchase and run unsupported by the original manufacturers. For example, the Palm Pilot devices used to program and control LCDs have run unsupported by the manufacturer since 2011. Of the 16 Palm Pilots that Otter Tail originally purchased, six remain operational. While the Company has been smart and resourceful in its approach to maintaining the system, it has exhausted all other options. Full replacement of the system is required.

Otter Tail's ability to continue to operate DR programs in the future, effectively hedge against high market prices, and to grow, enhance, and optimize its DR offerings is at risk as a result of this obsolescence. It is imperative to begin the replacement project now.

The project began development in early 2021 and was first introduced in the Company's June 7, 2021, EUIC filing where it was determined the inclusion of the project in the EUIC was premature as the project was still under development.

Since the original filing in 2021, a specialized team at Otter Tail, representing key areas of the DR program, was formed and the Company retained a consultant in the Fall of 2021. The team and the consultant attended industry conferences, during which meetings with the top vendors of DR programs were scheduled and their products reviewed. Investigation continued through interviews with nine utilities of interest from across the United States to understand their program successes, innovations and areas of growth, experiences contracting with the major vendors, and experiences using the vendors' DR platforms.

During the summer of 2022, initial filings for the DR project in both North Dakota and South Dakota were filed and the DR project was subsequently approved by both state commissions.

A complete Request for Proposals was released in the Fall of 2022. Six responses were received from major vendors in the DR industry. Written responses were scored, and top vendors were interviewed. Demonstrations with the short-listed vendors and follow up interviews were held. Team members provided final remarks to internal project leaders as a final review.

After a rigorous and extensive evaluation, two strategic partners were selected as the vendors of choice: Landis+Gyr (L+G) and Open Access Technology International (OATI).

The Company is currently partnering with L+G to provide the communications backbone used for its AMI Initiative where a Field Area Network (FAN) provides two-way communications with devices. Rigorous vetting against alternative cellular options for DR proved that the FAN procured under the AMI project added value to the DR project as the communications backbone.

Further into discovery, it was determined that the meters deployed under the AMI project could potentially replace a portion of the existing LCDs in the field for a select group of rates. This discovery has the potential to reduce the overall cost of the DR project and optimize asset management to the benefit of the DR program.

These two examples exemplify the synergies that a strategic partnership with L+G affords, positioning the Company for future synergies and optimizations as the industry matures.

Minnesota-based OATI was selected to provide the Demand Response Management System (DRMS) headend for the analytics needed to interface with organized markets and effectively hedge against the costs of high market prices.

OATI promotes itself as a "master integrator" and will provide the "single pane of glass" through which Otter Tail's operators will be able to coordinate multiple technologies across multiple vendors. OATI has integrated with many of the Bring Your Own Device vendors for smart thermostats, electric vehicles (EVs), and other cloud-based services. OATI is an experienced leader in microgrid technologies and the coordination that distributed energy resources require. Its DR platform is the basis upon which its full Distributed Energy Resource Management System (DERMs) solution is built.

Otter Tail is working in collaboration with the University of Minnesota at Morris (UMN Morris) on a flow state battery project, which is a first in edge system (endpoints on the system such as meters and substations) innovation and control for the Company and only furthers the strategic advantage of partnering with OATI. This collaboration will require the utility to purchase a system to interface with the battery's software, which OATI has included in its bid under this project.

The potential to reach across multiple vendors to run multiple programs, including the UMN Morris battery project, through a single software headend, furthers the Company's objective to install a program that will be easy for its operators and customers to use, while being positioned to optimize on a still unfolding future of growth in DR.

a. Proposed Recovery Mechanism

Pursuant of Minn. Stat. § 216B.1636, Otter Tail submits this request to recover costs related to its DR system in the EUIC Recovery Rider.

Minn. Stat. § 216B.1636, Subd. 2 (b) (2) has eleven filing requirements that must be met. Each of those filing requirements is addressed below.

(i) the location, description, and costs associated with the project;

- DR will be located throughout Otter Tail's service territory. A description of this system and associated costs is provided elsewhere in this filing.

(ii) evidence that the electric utility infrastructure project will conserve energy or use energy more efficiently than similar facilities currently used by the electric utility;

- DR programs are designed to reduce overall system capacity needs and reduce energy usage and associated costs. The Company's DR system shifts or reduces load when called upon by activating LCDs located at customer homes and businesses. The ability to reduce load provides reliability benefits for the grid by providing an additional tool to address high-demand situations. For more information regarding energy conservation and efficient energy use related to DR, please see the business case section in this filing.

(iii) the proposed schedule for implementation;

- DR implementation is expected to begin in the third quarter of 2024 and is projected to be completed in 2027.

(iv) a description of the costs, and salvage value, if any, associated with the existing infrastructure replaced or modified as a result of the project;

- Otter Tail's current DR system is fully depreciated and has no salvage value.

(v) the proposed rate design and an explanation of why the proposed rate design is in the public interest;

- Otter Tail proposes to include the DR project cost recovery in the EUIC per meter charge, which is allocated to all customers based on the weighted average cost of the meters per class. Charges for the EUIC recovery mechanism display on the Resource Adjustment line of customer bills.

(vi) the magnitude and timing of any known future electric utility projects that the utility may seek to recover under this section;

- The scope of each current project for which Otter Tail is seeking EUIC recovery is detailed in this filing.

(vii) the magnitude of EUIC in relation to the electric utility's base revenue as approved by the commission in the electric utility's most recent general rate case, exclusive of fuel cost adjustments;

- Otter Tail's base annual revenue as approved in our last general rate case is $209,032,038. When DR is fully installed in year 2027, the total annual tracker revenue requirement is estimated to be approximately $2.7 million.

(viii) the magnitude of EUIC in relation to the electric utility's capital expenditures since its most recent general rate case;

- The table below shows Otter Tail's Total Company annual capital additions, retirements, and net additions from 2021-2023.

Table 1
Net Capital Additions (OTP Total)

	A	B	C	D
	Year	**OTP Additions**	**OTP Retirements**	**OTP Net Additions**
1	2021	247,848,815	(10,952,385)	236,896,430
2	2022	102,283,875	(16,892,557)	85,391,318
3	2023	248,111,303	(76,038,412)	172,072,891
	Total	598,243,993	(103,883,354)	494,360,639

The DR project will result in estimated total capitalized additions of about $9.7 million (MN Total).

(ix) the amount of time since the utility last filed a general rate case and the utility's reason for seeking recovery outside of a general rate case;

- Otter Tail filed a general rate case on November 2, 2020. The projects in this filing are not included in the 2021 test year in the current rate case because these projects were not completed and in-service prior to the end of the case.

(x) documentation supporting the calculation of the EUIC;

- A tracker calculating the updated EUIC rate is provided as Attachments 1-10.
- The calculation of the EUIC adjustment will be filed with the Commission annually. The EUIC adjustment will be implemented as approved in the annual filing or the month immediately following the Commission's order.

(xi) a cost and benefit analysis showing that the electric utility infrastructure project is in the public interest.

- A cost and benefit analysis is included in the "Demand Response Business Case" section of this filing.

b. Demand Response Business Case

The legacy DR system is a one-way system in that load control requests can be sent to the receivers, but the receivers cannot provide confirmation back that they received the control request, nor provide any data from the edge system. As Otter Tail modernizes the grid, advancements in both metering and load management are essential. The L+G FAN communication system, already installed as part of AMI, will provide the communications backbone, upgrading the outdated paging system, maintaining the functionality of Otter Tail's DR programs, and providing two-way communications, which enables significant enhancements to the DR system through data.

To mitigate the risk of a failure of the obsolete legacy system and to take advantage of rapidly evolving technology and programs, the Company has developed a phased approach to the project.

In the first phase, OATI will be integrated with the legacy system. This integration will improve the analytics of directing the actions for DR and lay the foundation to begin replacing the Comverge LCDs for L+G devices. This work can begin immediately. It is important to note that the Comverge software cannot be completely retired until every Comverge LCD is removed from the program and replaced with a new L+G device.

In the second phase, deployment will begin to replace the Comverge LCDs with the new L+G LCDs for approximately 26,000 devices. These new devices will then be integrated to the previously established OATI headend.

The Company will also be working with L+G during this time to develop meter disconnect for use under a DR event. Meters deployed under the current AMI project will work as a load control switch for those customers solely on a water heating rate. This development would effectively reduce the number of LCDs in the field by more than 14,000, realizing significant cost savings on the hardware and deployment.

L+G has indicated it will take at least six months to complete the financial assessment and groundwork to include meter disconnect in its DR product processes, and prior to the commencement of the product development. Scheduling this capability for phase three of the project mitigates the risk of the legacy system failing by deploying devices early in the project for those rates that require an LCD while providing the development time needed for meter disconnect use as a DR product for those customers on a water heating rate solely.

Phase three of this project is dependent on L+G's ability to develop the meter disconnect application as a DR product with no further development or integration cost to the Company, so two cases have been developed for the project costs based on the switch count.

The Company has developed, with its vendors, a base case that replaces every LCD in the field resulting in a project cost of **[PROTECTED DATA BEGINS…**

… PROTECTED DATA ENDS] Forecasted costs for the recovery period are included in Attachment 7.

Otter Tail has included its proposed DR system as the lead project within a larger bundle of projects, called Innovative Distributed Energy Automation (IDEA), within a funding request to the U.S. Department of Energy's (DOE) Grid Resilience and Innovation Partnership (GRIP) program, Topic Area 2: Smart Grid Grants. The Company's January 2024 concept paper for IDEA has been "encouraged" by the DOE to proceed to the full application phase. The Company plans to file a full application with the DOE in May 2024. The Company also applied to the Minnesota State Competitiveness Fund, administered by the Department for additional funding. The Department has indicated that funds have been reserved for this project should Otter Tail be successful in gaining the DOE funding. Otter Tail continues to look for other funding mechanisms to lessen the financial impact on our customers for the DR project.

Otter Tail takes its load control program seriously. The Company is proud of the program it has developed and the means it has taken to support and safeguard the legacy system. Otter Tail's commitment to DR programs and the growth of them can be validated by their inclusion in the Company's Energy Conservation Optimization (ECO) plan, which was approved by the Deputy Commissioner of the Department in December 2023. Through the ECO filing, the Company has aggressive goals to continue to grow customer participation in DR programming and provide further benefits to the electric grid.

The Company and its customers depend on a viable and modernized DR platform to continue to provide safe, reliable, electrification at some of the lowest rates in the country. Modern technologies are required to continue to

support the ECO plan, future DR plans, and to optimize these loads. The legacy system is a risk to these plans, and mitigation of this risk through program replacement is necessary. All other options have been exhausted.

The opportunities for optimization and mitigation of the risk begin immediately for the Company through the multiple synergies and strategic collaboration it has found with L+G and OATI.

C. EUIC Recovery Methodology

Attachments 1-4 of this Petition are, respectively, the Revenue, Revenue Requirement Summary, Rate Design, and Tracker Summary calculations used for Otter Tail's proposed EUIC rate update. Attachments 5-7 provide the revenue requirement calculations for the AMI, OMS, and DR specific projects discussed in this filing. Otter Tail continues to propose using a per meter charge allocated to all customers based on the weighted average cost of the AMI meters per class to recover costs for the AMI, OMS, and DR systems between general rate cases. The charge calculated for the EUIC recovery mechanism is shown on the Resource Adjustment line of customer bills.

Specifically, the calculations of the revenue requirement in this Petition include the following:

- *Rate base section*. This section provides details on the amount of plant in service, accumulated depreciation (if applicable), construction work in progress (CWIP), accumulated deferred taxes including the effect of proration on Federal amounts, and a 13-month average rate base calculation.
- *Expense section*. The expenses applicable to a project are listed here and include operating costs, property taxes, depreciation, and income taxes.
- *Revenue requirements section*. This section shows the components of the revenue requirements, including expenses and return on rate base.
- *Return on investment (cost of capital)*. The return on investment utilizes the return on equity approved in Otter Tail's Rate Case.
- *Depreciation expense*. Depreciation expense is calculated using the Company's current estimated depreciation rates.
- *Property taxes*. The property tax calculation is based on Otter Tail's composite tax rate for the jurisdictions in which the facilities are located and is calculated in accordance with the procedures specified by the states.
- *Operation and maintenance expense*. Otter Tail will track operation and maintenance costs specifically related to each project in Attachments 5-7.

- *Operation and maintenance savings*. Otter Tail will track operation and maintenance savings specifically related to the AMI project in Attachment 8. Annual O&M savings related to AMI implementation primarily include costs related to manual meter reading, of which a certain portion is completed by third party contract services and a certain portion conducted internally by service reps across Otter Tail's system. Due to a delay in the installation of the AMI meters, the estimated O&M savings have been adjusted to reflect the new timeline.
- *Proration of Federal Accumulated Deferred Income Taxes (ADIT)*. Once the project is in service, Otter Tail will include proration of Federal ADIT, as shown in Attachment 10. The methodology used for proration of Federal ADIT is in adherence to United States Internal Revenue Service (IRS) rules related to proration, including recently issued IRS private letter rulings. Otter Tail interprets this to include proration of Federal ADIT for the (forward-looking) recovery period and, in future filings, preserving the effect of the application of the proration methodology for the true-up period. This calculation methodology is necessary to comply with Section 1.167(l)-l(h)(6)(ii) of the IRS regulations and to avoid a tax normalization violation.[3] In annual Updates, Otter Tail will include a workpaper with the details of the calculation of the proration of Federal ADIT for the recovery period and whether it results in an increase or decrease to the revenue requirement.
- *Jurisdictional Allocation Factors*. Jurisdictional allocators are used to allocate system cost among jurisdictions. Otter Tail utilizes the Minnesota jurisdictional allocations approved by the Commission in its last Rate Case, Docket No. E017/GR-20-719.
- *Sales Tax*. Minn. Stat. 297A.68 states there is no sales tax on smart meter related equipment in the state of Minnesota. Sales tax has been charged on all meter purchases to date. Otter Tail will file for a sales tax refund to recover the sales tax charged in error. The total refund will be approximately $0.9 million and is expected to be received later in 2024. Otter Tail has removed the sales tax on meter related equipment from the tracker, lowering the overall revenue requirement.

[3] *See* Treas. Reg. SS 1.167(l)-1(h)(6)(ii).

VI. GRID MODERNIZATION AND OTTER TAIL'S INTEGRATED DISTRIBUTION PLAN

Otter Tail sees the AMI Project as a contributing factor in the Commission's Planning Objectives for integrated distribution plans. The change to AMI will impact several different areas of Otter Tail and, working together, AMI will allow for the growth of potential future technologies in:

- Distribution automation
- Outage detection and management
- Conservation voltage reduction
- Load management replacement
- Distribution Supervisory Control and Data Acquisition (SCADA)

The AMI project itself will allow for new opportunities and choices for customers, including the development of new rate options and near real-time data access. AMI will reduce meter related costs (including meter reading) as well as the risk of safety incidents that are related to meter reading.

AMI, together with the OMS project, will provide improved efficiencies for field personnel and outage assessment and restoration. Outages will be identified more quickly, the crews will be deployed more efficiently, reducing restoration times, and customers will have the capability to receive improved outage notifications. Customers will have access to estimated restoration times, progress updates, and predicted outages.

The OMS project enables the capability to "track" each customer on the delivery system, identifying the connection from the meter to the delivery transformer, to a feeder, and to the distribution substation. This data allows for better outage response when the outage information is sent to the OMS. The data collected will also be used by Otter Tail engineers to improve asset health programs including underground cable replacement and overhead line replacement. The connectivity model will be used by the AMI technology and will also be available for future tools such as Voltage and Reactive Power (Volt/Var) optimization, DR controls, and automated system reconfiguration.

VII. PERFORMANCE METRICS

In the previous EUIC Order, the Commission ordered Otter Tail to propose and establish performance metrics to track the performance of the AMI, OMS, and DR Projects. As a starting point, Otter Tail utilized the proposed list of metrics presented to the Commission previously in Docket Nos. E002/M-19-666 and E999/DI-20-627 in Appendix E of the Report filed by the Minnesota Department of Commerce, Division of Energy Resources

on Methods for Performance Evaluations, Metrics, and Customer Protections for AMI and FAN. Otter Tail used the list to assist internal discussions about which metrics included on the list would best present the progress and results of the AMI and OMS projects to the Commission. Otter Tail met with members of the Department on January 10, 2023, to discuss and receive feedback regarding the metrics that Otter Tail planned to provide in this filing. It is Otter Tail's intent to continue discussions with the Department as the EUIC projects progress so that outlined metrics and reporting can best reflect the status and improvements driven by the AMI and OMS projects. Otter Tail does anticipate that over time, some of the metrics being reported in the EUIC annual update will move to the Integrated Distribution Plan.

The full list of Otter Tail's proposed metrics can be found in Attachment 11. Otter Tail plans to present information for most metrics with Minnesota jurisdiction specific data on an annual basis. When data is available and applicable, Otter Tail will also provide data for performance metrics prior to AMI installation to establish a base year for comparison purposes.

VIII. RATE DESIGN

Otter Tail proposes to continue to use a monthly per meter charge rate design for the EUIC rider. The proposed calculation will determine the average cost per meter for materials and labor for each customer class. The weighted average cost per customer class is then used to determine the percentage of project costs to be charged to each class. The weighted average cost per class, divided by the average annual number of meters per class, equals the monthly per meter charge.

IX. REVENUE REQUIREMENTS, RATE APPLICATION AND IMPACT

Otter Tail proposes that the EUIC continue to be applicable to electric service meters under all of Otter Tail's retail rate schedules, as defined in Rate Schedule 13.11, in Attachment 13. The charges will be included as part of the Resource Adjustment line on customers' bills. A residential customer will see an increase in their monthly bill of $1.31 per meter. A Large General Service commercial customer will see a $109.48 per meter increase on its monthly bill.

X. CUSTOMER NOTIFICATION AND BILLING

Attachment 14 is the proposed notice to customers that will be included with customer bills in the month that the new EUIC rates are implemented.

XI. CONCLUSION

Otter Tail respectfully requests that the Commission approve recovery of the new DR system project, the updated costs associated with all projects in the rider, and the EUIC annual rate adjustments as set forth in this Annual Update filing to be in effect for usage on and after January 1, 2025.

Dated: May 3, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

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OTTER TAIL POWER COMPANY
ELECTRIC UTILITY INFRASTRUCTURE COST RECOVERY RIDER
FILING ATTACHMENTS

Attachment 1	Projection of Revenue
Attachment 2	Summary of Revenue Requirements
Attachment 3	Class Allocation and Rate Design
Attachment 4	Electric Utility Infrastructure Cost Recovery Tracker
Attachment 5	Advanced Metering Infrastructure
Attachment 6	Outage Management System
Attachment 7	Demand Response
Attachment 8	AMI Cost Savings Adjustment
Attachment 9	Federal ADIT Proration Projection
Attachment 10	Federal ADIT Proration Preservation
Attachment 11a	Otter Tail Required Metrics
Attachment 11b	Otter Tail Minnesota Customer AMI Mailer
Attachment 11c	Post Card – Two Week Advance
Attachment 11d	Post Card – Post Installation
Attachment 12	Electric Utility Infrastructure Cost Recovery Rider, Electric Rate Schedule 13.11
Attachment 13	Notice to Customers
Attachment 14	Excel version of Electric Utility Infrastructure Cost Recovery Tracker

Projected Revenue for January 2025 to December 2025 Recovery Period

Line No.	Class	Meters (Annual Count)	Monthly Rate per Unit	Amount
1	Residential	594,765	$2.74	$1,630,486
3	Residential RDC	26,391	$6.40	$169,032
5	Farm	16,675	$8.39	$139,865
7	General Service	24,428	$17.39	$424,806
9	Small General Service	109,769	$4.41	$484,536
11	General Service TOU	1,509	$28.17	$42,506
13	Large General Service 602	204	$150.71	$30,745
15	Large General Service 603	5,546	$27.29	$151,330
17	Irrigation	3,636	$14.78	$53,748
19	Outdoor Lighting	2,489	$2.95	$7,342
21	OPA	5,941	$7.33	$43,565
23	CS - Deferred Load	99,849	$6.40	$639,524
25	CS - Interruptible Small Duel Fuel	77,501	$6.52	$505,403
27	CS - Interruptible Large Duel Fuel	4,131	$29.58	$122,182
29	CS - Off Peak	14,304	$8.28	$118,449
31	Total revenue			$4,563,521

Summary of Revenue Requirements

Line No.	**Revenue Requirements**	**January 2025 - December 2025**
1	Advanced Metering Infrastructure	5,433,069
2	Outage Management / GIS Updates	416,255
3	Demand Response System	750,970
4	O&M Savings due to AMI Implementation	(2,114,267)
5	True-Up	77,494
6	Net Revenue Requirement	$4,563,521

Class Allocation and Current Rate Design

Line No.		January 2025-December 2025	Percent of Total	Annual Meter Count	Per Meter Charge	Revenue Requirements by Class
1	Total 2024 Minnesota Revenue Requirements	$4,563,521				
2	Residential		35.73%	594,765	$2.74	$1,630,486
3	Residential RDC		3.70%	26,391	$6.40	$169,032
4	Farm		3.06%	16,675	$8.39	$139,865
5	Small General Service		10.62%	109,769	$4.41	$484,536
6	General Service		9.31%	24,428	$17.39	$424,806
7	General Service TOU		0.93%	1,509	$28.17	$42,506
8	Large General Service - Primary		0.67%	204	$150.71	$30,745
9	Large General Service - Secondary		3.32%	5,546	$27.29	$151,330
10	Irrigation		1.18%	3,636	$14.78	$53,748
11	Outdoor Lighting		0.16%	2,489	$2.95	$7,342
12	OPA		0.95%	5,941	$7.33	$43,565
13	Controlled Service - Deferred Load		14.01%	99,849	$6.40	$639,524
14	Controlled Service - Interruptible Small Duel Fuel		11.07%	77,501	$6.52	$505,403
15	Controlled Service - Interruptible Large Duel Fuel		2.68%	4,131	$29.58	$122,182
16	Controlled Service - Off Peak		2.60%	14,304	$8.28	$118,449
17	Total Minnesota Revenue Requirements		100.00%	987,138		$4,563,521

Rate Impact				
	Meter Count (Month)	Current Rate ($ per meter)	Proposed Rate ($ per meter)	Monthly Impact (Increase or decrease from prior rate)
Residential	49,564	$1.43	$2.74	$1.31
Residential RDC	2,199	$3.47	$6.40	$2.93
Farm	1,390	$3.40	$8.39	$4.99
Small General Service	9,147	$5.52	$4.41	-$1.11
General Service	2,036	$5.52	$17.39	$11.87
General Service TOU	126	$11.33	$28.17	$16.84
Large General Service - Primary	17	$41.24	$150.71	$109.48
Large General Service - Secondary	462	$13.31	$27.29	$13.98
Irrigation	303	$9.31	$14.78	$5.48
Outdoor Lighting	207	$3.54	$2.95	-$0.59
OPA	495	$3.96	$7.33	$3.38
Controlled Service - Deferred Load	8,321	$3.47	$6.40	$2.93
Controlled Service - Interruptible Small Duel Fuel	6,458	$3.54	$6.52	$2.98
Controlled Service - Interruptible Large Duel Fuel	344	$14.24	$29.58	$15.34
Controlled Service - Off Peak	1,192	$4.33	$8.28	$3.95

Line No.	*TRACKER SUMMARY* *Requirements Compared to Billed:*	2023 January Actual	2023 February Actual	2023 March Actual	2023 April Actual	2023 May Actual	2023 June Actual	2023 July Actual	2023 August Actual	2023 September Actual	2023 October Actual	2023 November Actual	2023 December Actual	2023 YE Actual
	Revenue Requirements													
1	Advanced Metering Infrastructure	34,093	34,113	33,997	34,022	33,648	33,079	32,917	32,872	32,892	32,907	32,929	48,708	416,177
2	Outage Management System	10,172	12,873	15,561	14,484	14,325	14,000	18,299	11,795	13,024	11,795	11,795	13,564	161,686
3	Demand Response System	-	-	-	-	-	-	-	-	-	-	-	-	-
4	**Total Revenue Requirements**	44,265	46,986	49,558	48,506	47,973	47,079	51,215	44,667	45,916	44,701	44,724	62,272	577,863
5														
6	**ADIT Preservation of Proration**													
7														
8	**O&M Savings due to AMI Implementation**											-	-	-
9														
10	**Net Revenue Requirement**	44,265	46,986	49,558	48,506	47,973	47,079	51,215	44,667	45,916	44,701	44,724	62,272	577,863
11														
12	Billed (forecast meter x adj factor)	69,531	65,611	65,621	67,427	64,793	72,994	68,232	67,192	71,633	67,232	67,078	64,509	811,851
13														
14	Monthly Revenue Difference	(25,266)	(18,625)	(16,063)	(18,921)	(16,820)	(25,914)	(17,017)	(22,525)	(25,717)	(22,531)	(22,354)	(2,237)	(233,988)
15	Carrying Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Life-to-Date Revenue Requirement (Cumulative Difference)	(196,398)	(215,023)	(231,085)	(250,006)	(266,825)	(292,740)	(309,757)	(332,282)	(357,999)	(380,530)	(402,883)	(405,120)	(405,120)
17														
18														
19	Forecasted Meter Count	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	987,138

Line No.	*TRACKER SUMMARY* *Requirements Compared to Billed:*	2024 January Actual	2024 February Actual	2024 March Actual	2024 April Projected	2024 May Projected	2024 June Projected	2024 July Projected	2024 August Projected	2024 September Projected	2024 October Projected	2024 November Projected	2024 December Projected	2024 YE Projected
	Revenue Requirements													
1	Advanced Metering Infrastructure	130,141	126,478	226,782	227,286	233,293	242,032	257,682	264,950	274,659	282,682	287,100	290,922	2,844,007
2	Outage Management System	14,143	14,143	14,143	35,432	35,432	35,432	35,432	35,432	35,432	35,432	35,432	35,432	361,317
3	Demand Response System	-	-	-	-	-	-	-	-	-	-	-	-	-
4	**Total Revenue Requirements**	144,284	140,621	240,925	262,718	268,725	277,464	293,114	300,382	310,091	318,114	322,532	326,354	3,205,324
5														
6	**ADIT Preservation of Proration**	270	270	270	270	270	270	270	270	270	270	270	270	3,237
7														
8	**O&M Savings due to AMI Implementation**	-	-	-	(58,730)	(58,730)	(58,730)	(58,730)	(58,730)	(58,730)	(58,730)	(58,730)	(58,730)	(528,567)
9														
10	**Net Revenue Requirement**	144,553	140,891	241,195	204,258	210,265	219,004	234,654	241,922	251,631	259,654	264,073	267,894	2,679,994
11														
12	Billed (forecast meter x adj factor)	72,379	65,623	71,126	220,917	220,917	220,917	220,917	220,917	220,917	220,917	220,917	220,917	2,197,380
13														
14	Monthly Revenue Difference	72,175	75,268	170,069	(16,659)	(10,652)	(1,913)	13,737	21,005	30,714	38,737	43,156	46,977	482,614
15	Carrying Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Life-to-Date Revenue Requirement (Cumulative Difference)	(332,945)	(257,678)	(87,609)	(104,268)	(114,919)	(116,832)	(103,095)	(82,091)	(51,376)	(12,639)	30,517	77,494	77,494
17														
18														
19	Forecasted Meter Count	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	987,138

Approved by MN PUC on March 13, 2024
in Docket No. E017/M-23-131

SUMMARY	**January 2024 - December 2024**
Revenue requirements	$3,011,727
Carrying Charge	0
True-up	(360,723)
Total requirements	$2,651,004
Jan 2024 - Dec 2024 projected meter count	987,138
Average Rate	$2.68555

Line No.	*TRACKER SUMMARY* *Requirements Compared to Billed:*	2025 January Projected	2025 February Projected	2025 March Projected	2025 April Projected	2025 May Projected	2025 June Projected	2025 July Projected	2025 August Projected	2025 September Projected	2025 October Projected	2025 November Projected	2025 December Projected	2025 YE Projected
	Revenue Requirements													
1	Advanced Metering Infrastructure	450,729	451,750	452,767	453,526	453,422	453,316	453,208	453,098	452,986	452,872	452,756	452,638	5,433,069
2	Outage Management System	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	416,255
3	Demand Response System	25,160	48,411	53,642	58,829	61,403	64,005	66,628	69,266	71,915	74,572	77,235	79,905	750,970
4	**Total Revenue Requirements**	510,577	534,849	541,097	547,043	549,512	552,009	554,524	557,052	559,589	562,132	564,680	567,230	6,600,294
5														
6	**ADIT Preservation of Proration**													
7														
8	**O&M Savings due to AMI Implementation**	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(176,189)	(2,114,267)
9														
10	**Net Revenue Requirement**	334,389	358,660	364,908	370,854	373,323	375,820	378,335	380,863	383,400	385,943	388,491	391,041	4,486,027
11														
12	Billed (forecast meter x adj factor)	380,293	380,293	380,293	380,293	380,293	380,293	380,293	380,293	380,293	380,293	380,293	380,293	4,563,521
13														
14	Monthly Revenue Difference	(45,905)	(21,634)	(15,385)	(9,440)	(6,970)	(4,473)	(1,958)	570	3,106	5,650	8,197	10,748	(77,494)
15	Carrying Charge	-	-	-	-	-	-	-	-	-	-	-	-	-
16	Life-to-Date Revenue Requirement (Cumulative Difference)	31,589	9,956	(5,430)	(14,869)	(21,839)	(26,313)	(28,271)	(27,701)	(24,595)	(18,945)	(10,748)	(0)	(0)
17														
18														
19	Forecasted Meter Count	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	82,262	987,138

SUMMARY	**January 2025 - December 2025**
Revenue requirements	$4,486,027
Carrying Charge	0
True-up	77,494
Total requirements	$4,563,521
Jan 2025 - Dec 2025 projected meter count	987,138
Average Rate	$4.62298

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	*Year>>*	2023 Actual January	2023 Actual February	2023 Actual March	2023 Actual April	2023 Actual May	2023 Actual June	2023 Actual July	2023 Actual August	2023 Actual September	2023 Actual October	2023 Actual November	2023 Actual December	2023 Actual Total
	RATE BASE													
1	Plant Balance	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Accumulated Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Net Plant in Service	-	-	-	-	-	-	-	-	-	-	-	-	-
4	CWIP	3,250,124	3,638,008	3,937,424	4,392,812	5,361,180	10,121,697	11,347,248	13,925,060	14,307,489	14,822,686	15,293,364	16,120,504	16,120,504
5	ADIT - NOL DTA													
6	ADIT Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
7	ADIT - Federal & State Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Accumulated Deferred Income Taxes Federal & State - No Prorat	-	-	-	-	-	-	-	-	-	-	-	-	-
9	ADIT - Federal Depreciation													
10	Ending rate base	3,250,124	3,638,008	3,937,424	4,392,812	5,361,180	10,121,697	11,347,248	13,925,060	14,307,489	14,822,686	15,293,364	16,120,504	16,120,504
11														
12	Average rate base	766,513	766,513	766,513	766,513	766,513	766,513	766,513	766,513	766,513	766,513	766,513	766,513	9,198,160
13														
14	Return on Rate Base	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	660,083
15														
16	Available for return (equity portion of rate base)	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	457,792
17														
18	***EXPENSES***													
19	*O&M and Depreciation*													
20	Operating Costs	-	-	-	-	-	-	-	-	-	-	-	33,529	33,529
21	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Book Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
23	Total O&M and Depreciation Expense	-	-	-	-	-	-	-	-	-	-	-	33,529	33,529
24														
25	Income before Taxes													
26	Available for return (from above)	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	38,149	457,792
27	Taxable Income (grossed up)	53,537	53,537	53,537	53,537	53,537	53,537	53,537	53,537	53,537	53,537	53,537	53,537	642,444
28														
29	Income Taxes													
30	Current Income Tax	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	184,651
31	Deferred Income Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
32	Total Income Tax Expense	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	184,651
33														
34														
35	***REVENUE REQUIRMENTS***													
36	Expenses	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	15,388	48,917	218,180
37	Return on rate base	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	55,007	660,083
38	Subtotal revenue requirements	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	103,924	878,263
39	Adjustments													
40	Total revenue requirements	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	70,395	103,924	878,263
41														
42	Minnesota share - Meters (C6)	6,150	5,924	6,572	6,538	5,873	13,777	13,854	15,868	15,787	15,879	15,785	22,519	144,525
43	Minnesota share - FAN (P60)	819	780	1,380	1,192	4,661	5,023	6,325	5,588	5,464	5,295	5,158	7,269	48,952
44	Minnesota share - Software (P90)	27,124	27,410	26,046	26,293	23,114	14,280	12,737	11,417	11,641	11,732	11,986	18,920	222,700
45	Total Minnesota Share	34,093	34,113	33,997	34,022	33,648	33,079	32,917	32,872	32,892	32,907	32,929	48,708	416,177

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2		MN Cap Structure with allowed ROE per order.												
3		Capital Structure	**Ratio**	**Cost**	**WA Cost**						**Property tax**			
4		Debt	47.50%	4.63%	2.20%						2023 composite rate	1.13%		
5		Preferred equity	0.00%	0.00%	0.00%									
6		Common equity	52.50%	9.48%	4.98%									
7		Total	100.00%		7.18%	Overall Return								
8														
9			**Book**	**Tax**										
10		Project life (years)	20	20-year MACRS										
11														
12				**Fed Portion**	**State Portion**									
13		Statutory Tax Rate	28.74%	18.94%	9.80%									
14		Tax conversion factor	1.40335											
15		MN share - C6 factor	46.091%											
16		MN share - P90 factor	49.152%											
17		MN share - P60 factor	43.856%											
18	**Deferred Tax**													
19	Book depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Tax depreciation-Federal	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Tax depreciation-MN	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Federal deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-
23	State deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	*Year>>*	2024 Actual January	2024 Actual February	2024 Actual March	2024 Projected April	2024 Projected May	2024 Projected June	2024 Projected July	2024 Projected August	2024 Projected September	2024 Projected October	2024 Projected November	2024 Projected December	2024 Projected Total
	RATE BASE													
1	Plant Balance	-	22,612,690	23,742,125	26,233,749	30,482,169	35,051,553	37,824,138	40,218,567	41,784,228	43,806,619	45,476,047	46,822,194	46,822,194
2	Accumulated Depreciation	-	-	(180,250)	(366,676)	(566,852)	(786,332)	(1,029,266)	(1,287,478)	(1,566,784)	(1,853,292)	(2,149,577)	(2,453,849)	(2,453,849)
3	Net Plant in Service	-	22,612,690	23,561,875	25,867,073	29,915,317	34,265,221	36,794,872	38,931,088	40,217,444	41,953,327	43,326,471	44,368,345	44,368,345
4	CWIP	19,855,004	(20,467)	(24,699)	(37,453)	(23,849)	(49,323)	(44,071)	(113,465)	(21,586)	(16,569)	(13,425)	-	-
5	ADIT - NOL DTA													
6	ADIT Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
7	ADIT - Federal & State Depreciation	-	(152,762)	(253,717)	(352,896)	(448,123)	(537,802)	(620,740)	(699,287)	(771,771)	(842,185)	(909,789)	(975,097)	(975,097)
8	Accumulated Deferred Income Taxes Federal & State - No Prorat	-	(152,762)	(253,717)	(352,896)	(448,123)	(537,802)	(620,740)	(699,287)	(771,771)	(842,185)	(909,789)	(975,097)	(975,097)
9	ADIT - Federal Depreciation	-	(100,676)	(167,208)	(232,571)	(295,329)	(354,431)	(409,090)	(460,855)	(508,624)	(555,030)	(599,583)	(642,623)	(642,623)
10	Ending rate base	19,855,004	22,439,461	23,283,459	25,476,724	29,443,345	33,678,096	36,130,061	38,118,336	39,424,086	41,094,573	42,403,257	43,393,248	43,393,248
11														
12	Average rate base	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	2,633,719	31,604,627
13														
14	Return on Rate Base	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	2,268,027
15														
16	Available for return (equity portion of rate base)	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	1,572,962
17														
18	***EXPENSES***													
19	*O&M and Depreciation*													
20	Operating Costs	36,520	28,770	63,033	58,400	58,400	58,400	68,800	68,800	68,800	79,200	79,200	79,200	747,522
21	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Book Depreciation	-	-	180,250	186,426	200,176	219,480	242,934	258,212	279,306	286,508	296,284	304,272	2,453,849
23	Total O&M and Depreciation Expense	36,520	28,770	243,283	244,826	258,577	277,880	311,734	327,012	348,106	365,707	375,484	383,472	3,201,371
24														
25	Income before Taxes													
26	Available for return (from above)	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	131,080	1,572,962
27	Taxable Income (grossed up)	183,952	183,952	183,952	183,952	183,952	183,952	183,952	183,952	183,952	183,952	183,952	183,952	2,207,419
28														
29	Income Taxes													
30	Current Income Tax	52,871	(99,891)	(48,083)	(46,308)	(42,356)	(36,808)	(30,066)	(25,675)	(19,613)	(17,543)	(14,733)	(12,437)	(340,640)
31	Deferred Income Tax	-	152,762	100,955	99,180	95,227	89,679	82,938	78,547	72,484	70,414	67,604	65,308	975,097
32	Total Income Tax Expense	52,871	52,871	52,871	52,871	52,871	52,871	52,871	52,871	52,871	52,871	52,871	52,871	634,456
33														
34														
35	***REVENUE REQUIRMENTS***													
36	Expenses	89,392	81,642	296,154	297,697	311,448	330,751	364,606	379,883	400,977	418,579	428,355	436,343	3,835,827
37	Return on rate base	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	189,002	2,268,027
38	Subtotal revenue requirements	278,394	270,644	485,157	486,699	500,450	519,753	553,608	568,886	589,979	607,581	617,358	625,345	6,103,854
39	Adjustments													
40	Total revenue requirements	278,394	270,644	485,157	486,699	500,450	519,753	553,608	568,886	589,979	607,581	617,358	625,345	6,103,854
41														
42	Minnesota share - Meters (C6)	72,058	73,877	139,691	146,730	161,852	175,973	191,235	195,689	205,689	214,910	221,275	223,243	2,022,224
43	Minnesota share - FAN (P60)	15,823	13,609	19,930	18,168	16,072	14,510	14,323	13,869	13,826	13,959	13,665	13,446	181,200
44	Minnesota share - Software (P90)	42,260	38,993	67,161	62,387	55,368	51,550	52,124	55,392	55,144	53,814	52,160	54,233	640,584
45	Total Minnesota Share	130,141	126,478	226,782	227,286	233,293	242,032	257,682	264,950	274,659	282,682	287,100	290,922	2,844,007

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2024 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	20	20-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - C6 factor	46.091%												
16	MN share - P90 factor	49.152%												
17	MN share - P60 factor	43.856%												
18	**Deferred Tax**													
19	Book depreciation	-	-	180,250	186,426	200,176	219,480	242,934	258,212	279,306	286,508	296,284	304,272	2,453,849
20	Tax depreciation-Federal	-	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	5,846,433
21	Tax depreciation-MN	-	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	531,494	5,846,433
22	Federal deferred income taxes	-	(100,676)	(66,533)	(65,363)	(62,758)	(59,102)	(54,659)	(51,765)	(47,769)	(46,405)	(44,553)	(43,040)	(642,623)
23	State deferred income taxes	-	(52,086)	(34,422)	(33,817)	(32,469)	(30,577)	(28,279)	(26,782)	(24,714)	(24,009)	(23,051)	(22,268)	(332,473)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	*Year>>*	2025 Projected January	2025 Projected February	2025 Projected March	2025 Projected April	2025 Projected May	2025 Projected June	2025 Projected July	2025 Projected August	2025 Projected September	2025 Projected October	2025 Projected November	2025 Projected December	2025 Projected Total
	RATE BASE													
1	Plant Balance	47,407,825	47,984,656	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241	48,409,241
2	Accumulated Depreciation	(2,770,775)	(3,090,207)	(3,412,110)	(3,735,864)	(4,059,618)	(4,383,372)	(4,707,127)	(5,030,881)	(5,354,635)	(5,678,389)	(6,002,143)	(6,325,897)	(6,325,897)
3	Net Plant in Service	44,637,050	44,894,449	44,997,131	44,673,377	44,349,622	44,025,868	43,702,114	43,378,360	43,054,606	42,730,852	42,407,097	42,083,343	42,083,343
4	CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
5	ADIT - NOL DTA													
6	ADIT Proration Factors	0.9178	0.8411	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027	
7	ADIT - Federal & State Depreciation	(1,038,151)	(1,097,191)	(1,151,942)	(1,202,743)	(1,249,922)	(1,293,596)	(1,333,649)	(1,370,080)	(1,403,006)	(1,432,311)	(1,458,111)	(1,480,289)	(1,480,289)
8	Accumulated Deferred Income Taxes Federal & State - No Prorat	(1,041,762)	(1,107,707)	(1,172,943)	(1,237,646)	(1,302,349)	(1,367,052)	(1,431,755)	(1,496,458)	(1,561,161)	(1,625,864)	(1,690,567)	(1,755,270)	(1,755,270)
9	ADIT - Federal Depreciation	(686,558)	(730,019)	(773,011)	(815,652)	(858,294)	(900,936)	(943,577)	(986,219)	(1,028,860)	(1,071,502)	(1,114,144)	(1,156,785)	(1,156,785)
10	Ending rate base	43,598,899	43,797,258	43,845,188	43,470,633	43,099,700	42,732,272	42,368,465	42,008,279	41,651,599	41,298,540	40,948,987	40,603,054	40,603,054
11														
12	Average rate base	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	3,543,693	42,524,317
13														
14	Return on Rate Base	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	3,051,651
15														
16	Available for return (equity portion of rate base)	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	2,116,435
17														
18	***EXPENSES***													
19	*O&M and Depreciation*													
20	Operating Costs	293,924	293,924	293,924	293,924	293,924	293,924	293,924	293,924	293,924	293,924	293,924	293,924	3,527,088
21	Property Tax	32,877	32,877	32,877	32,877	32,877	32,877	32,877	32,877	32,877	32,877	32,877	32,877	394,524
22	Book Depreciation	316,926	319,432	321,903	323,754	323,754	323,754	323,754	323,754	323,754	323,754	323,754	323,754	3,872,049
23	Total O&M and Depreciation Expense	643,727	646,233	648,704	650,555	650,555	650,555	650,555	650,555	650,555	650,555	650,555	650,555	7,793,661
24														
25	Income before Taxes													
26	Available for return (from above)	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	176,370	2,116,435
27	Taxable Income (grossed up)	247,508	247,508	247,508	247,508	247,508	247,508	247,508	247,508	247,508	247,508	247,508	247,508	2,970,102
28														
29	Income Taxes													
30	Current Income Tax	4,473	5,194	5,904	6,436	6,436	6,436	6,436	6,436	6,436	6,436	6,436	6,436	73,494
31	Deferred Income Tax	66,666	65,945	65,235	64,703	64,703	64,703	64,703	64,703	64,703	64,703	64,703	64,703	780,173
32	Total Income Tax Expense	71,139	71,139	71,139	71,139	71,139	71,139	71,139	71,139	71,139	71,139	71,139	71,139	853,667
33														
34														
35	***REVENUE REQUIRMENTS***													
36	Expenses	714,866	717,372	719,843	721,694	721,694	721,694	721,694	721,694	721,694	721,694	721,694	721,694	8,647,328
37	Return on rate base	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	254,304	3,051,651
38	Subtotal revenue requirements	969,170	971,677	974,147	975,998	975,998	975,998	975,998	975,998	975,998	975,998	975,998	975,998	11,698,979
39	Adjustments													
40	Total revenue requirements	969,170	971,677	974,147	975,998	975,998	975,998	975,998	975,998	975,998	975,998	975,998	975,998	11,698,979
41														
42	Minnesota share - Meters (C6)	348,620	352,117	355,264	357,397	358,882	360,393	361,932	363,500	365,097	366,724	368,382	370,072	4,328,380
43	Minnesota share - FAN (P60)	20,606	20,433	20,331	20,414	20,458	20,504	20,551	20,598	20,647	20,696	20,746	20,797	246,781
44	Minnesota share - Software (P90)	81,503	79,200	77,172	75,715	74,082	72,419	70,725	69,000	67,243	65,453	63,628	61,768	857,908
45	Total Minnesota Share	450,729	451,750	452,767	453,526	453,422	453,316	453,208	453,098	452,986	452,872	452,756	452,638	5,433,069

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2025 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	20	20-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - C6 factor	46.091%												
16	MN share - P90 factor	49.152%												
17	MN share - P60 factor	43.856%												
18	**Deferred Tax**													
19	Book depreciation	316,926	319,432	321,903	323,754	323,754	323,754	323,754	323,754	323,754	323,754	323,754	323,754	3,872,049
20	Tax depreciation-Federal	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	6,586,450
21	Tax depreciation-MN	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	548,871	6,586,450
22	Federal deferred income taxes	(43,935)	(43,460)	(42,992)	(42,642)	(42,642)	(42,642)	(42,642)	(42,642)	(42,642)	(42,642)	(42,642)	(42,642)	(514,162)
23	State deferred income taxes	(22,731)	(22,485)	(22,243)	(22,061)	(22,061)	(22,061)	(22,061)	(22,061)	(22,061)	(22,061)	(22,061)	(22,061)	(266,011)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Outage Management Project Revenue Requirements

Line No.	*Year>>*	2023 Actual Jan	2023 Actual Feb	2023 Actual Mar	2023 Actual Apr	2023 Actual May	2023 Actual Jun	2023 Actual Jul	2023 Actual Aug	2023 Actual Sep	2023 Actual Oct	2023 Actual Nov	2023 Actual Dec	2023 Actual Total
	RATE BASE													
1	Plant Balance	-	-	-	-	-	427,399	427,635	427,635	427,635	427,635	427,635	427,635	427,635
2	Accumulated Depreciation	-	-	-	-	-	-	(7,123)	(14,251)	(21,378)	(28,505)	(35,632)	(42,760)	(42,760)
3	Net Plant in Service	-	-	-	-	-	427,399	420,512	413,385	406,257	399,130	392,003	384,876	384,876
4	**CWIP Calculation:**													
5	Beginning Balance	1,660,559	1,747,902	1,905,397	1,969,518	2,018,841	708,643	281,265	421,244	627,103	682,109	813,349	1,122,251	
6	Additional CWIP	134,377	178,745	77,005	52,260	(1,306,985)	3,578	145,581	208,149	58,308	134,253	316,851	188,823	190,944
	Internal Costs	(47,034)	(21,250)	(12,884)	(2,937)	(3,212)	(3,557)	(5,366)	(2,289)	(3,302)	(3,013)	(7,949)	(3,493)	
	Removal of $1M in rate case test year													
7	Closings from CWIP	-	-	-	-	-	(427,399)	(236)						
8	AFDUC													
9	CWIP	1,747,902	1,905,397	1,969,518	2,018,841	708,643	281,265	421,244	627,103	682,109	813,349	1,122,251	1,307,581	1,307,581
10	ADIT Federal Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
11	Accumulated Deferred Income Taxes Federal & State	-	-	-	-	-	(5,852)	(9,657)	(13,461)	(17,265)	(21,069)	(24,872)	(28,676)	(28,676)
	Accumulated Deferred Income Taxes Federal & State - No Prora	-	-	-	-	-	(5,852)	(9,657)	(13,461)	(17,265)	(21,069)	(24,872)	(28,676)	(28,676)
	ADIT - Federal Depreciation	-	-	-	-	-	(3,857)	(6,364)	(8,871)	(11,378)	(13,885)	(16,392)	(18,899)	(18,899)
12	Ending rate base	1,747,902	1,905,397	1,969,518	2,018,841	708,643	702,812	832,099	1,027,027	1,071,101	1,191,410	1,489,381	1,663,780	1,663,780
13														
14	Average rate base	115,311	115,311	115,311	115,311	115,311	115,311	115,311	115,311	115,311	115,311	115,311	115,311	1,383,729
15														
16	Return on Rate Base	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	99,300
17														
18	Available for return (equity portion of rate base)	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	68,868
19														
20	***EXPENSES***													
21	*O&M and Depreciation*													
22	Operating Costs	10,105	15,600	21,069	18,877	18,555	17,893	19,515	6,280	8,780	6,280	6,280	9,880	159,112
23	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Book Depreciation	-	-	-	-	-	-	7,123	7,127	7,127	7,127	7,127	7,127	42,760
25	Total O&M and Depreciation Expense	10,105	15,600	21,069	18,877	18,555	17,893	26,638	13,407	15,907	13,407	13,407	17,007	201,871
26														
27	Income before Taxes													
28	Available for return (from above)	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	5,739	68,868
29	Taxable Income (grossed up)	8,054	8,054	8,054	8,054	8,054	8,054	8,054	8,054	8,054	8,054	8,054	8,054	96,646
30														
31	Income Taxes													
32	Current Income Tax	2,315	2,315	2,315	2,315	2,315	(3,537)	(1,490)	(1,489)	(1,489)	(1,489)	(1,489)	(1,489)	(898)
33	Def Income Tax	-	-	-	-	-	5,852	3,805	3,804	3,804	3,804	3,804	3,804	28,676
34	Total Income Tax Expense	2,315	2,315	2,315	2,315	2,315	2,315	2,315	2,315	2,315	2,315	2,315	2,315	27,778
35														
36														
37	***REVENUE REQUIRMENTS***													
38	Expenses	12,419	17,914	23,383	21,192	20,870	20,208	28,953	15,722	18,222	15,722	15,722	19,322	229,649
39	Return on rate base	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	8,275	99,300
40	Subtotal revenue requirements	20,694	26,189	31,658	29,467	29,145	28,483	37,228	23,997	26,497	23,997	23,997	27,597	328,949
41	Adjustments	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Total revenue requirements	20,694	26,189	31,658	29,467	29,145	28,483	37,228	23,997	26,497	23,997	23,997	27,597	328,949
43														
44	Minnesota share - P90 Factor	10,172	12,873	15,561	14,484	14,325	14,000	18,299	11,795	13,024	11,795	11,795	13,564	161,686

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2023 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	5	3-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - P90 factor	49.152%												
16														
17	**Deferred Tax**													
18	Book depreciation	-	-	-	-	-	-	7,123	7,127	7,127	7,127	7,127	7,127	42,760
19	Tax depreciation-Federal	-	-	-	-	-	20,362	20,362	20,362	20,362	20,362	20,362	20,362	142,531
20	Tax depreciation-MN	-	-	-	-	-	20,362	20,362	20,362	20,362	20,362	20,362	20,362	142,531
21	Federal deferred income taxes	-	-	-	-	-	(3,857)	(2,508)	(2,507)	(2,507)	(2,507)	(2,507)	(2,507)	(18,899)
22	State deferred income taxes	-	-	-	-	-	(1,995)	(1,297)	(1,297)	(1,297)	(1,297)	(1,297)	(1,297)	(9,778)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Outage Management Project Revenue Requirements

Line No.	*Year>>*	2024 Actual Jan	2024 Actual Feb	2024 Actual Mar	2024 Projected Apr	2024 Projected May	2024 Projected Jun	2024 Projected Jul	2024 Projected Aug	2024 Projected Sep	2024 Projected Oct	2024 Projected Nov	2024 Projected Dec	2024 Projected Total
	RATE BASE													
1	Plant Balance	427,635	427,635	427,635	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075
2	Accumulated Depreciation	(49,887)	(57,014)	(64,141)	(71,269)	(78,396)	(85,523)	(92,650)	(99,778)	(106,905)	(114,032)	(121,159)	(128,287)	(128,287)
3	Net Plant in Service	377,748	370,621	363,494	2,187,806	2,180,679	2,173,551	2,166,424	2,159,297	2,152,170	2,145,042	2,137,915	2,130,788	2,130,788
4	**CWIP Calculation:**													
5	Beginning Balance	1,307,581	1,391,548	1,821,251	1,824,022	-	-	-	-	-	-	-	-	
6	Additional CWIP	88,466	436,785	3,113	8,334	-	-	-	-	-	-	-	-	536,698
	Internal Costs	(4,499)	(7,082)	(342)	(917)									
	Removal of $1M in rate case test year													
7	Closings from CWIP				(1,831,439)	-	-	-	-	-	-	-	-	
8	AFDUC													
9	CWIP	1,391,548	1,821,251	1,824,022	-	-	-	-	-	-	-	-	-	-
10	ADIT Federal Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
11	Accumulated Deferred Income Taxes Federal & State	(45,801)	(62,926)	(80,051)	(97,176)	(114,301)	(131,425)	(148,550)	(165,675)	(182,800)	(199,925)	(217,050)	(234,175)	(234,175)
	Accumulated Deferred Income Taxes Federal & State - No Prora	(45,801)	(62,926)	(80,051)	(97,176)	(114,301)	(131,425)	(148,550)	(165,675)	(182,800)	(199,925)	(217,050)	(234,175)	(234,175)
	ADIT - Federal Depreciation	(30,185)	(41,470)	(52,756)	(64,042)	(75,328)	(86,614)	(97,900)	(109,186)	(120,472)	(131,758)	(143,043)	(154,329)	(154,329)
12	Ending rate base	1,723,495	2,128,946	2,107,465	2,090,630	2,066,378	2,042,126	2,017,874	1,993,622	1,969,370	1,945,118	1,920,866	1,896,613	1,896,613
13														
14	Average rate base	163,886	163,886	163,886	163,886	163,886	163,886	163,886	163,886	163,886	163,886	163,886	163,886	1,966,637
15														
16	Return on Rate Base	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	141,131
17														
18	Available for return (equity portion of rate base)	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	97,880
19														
20	***EXPENSES***													
21	*O&M and Depreciation*													
22	Operating Costs	6,595	6,595	6,595	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	468,958
23	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Book Depreciation	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	85,527
25	Total O&M and Depreciation Expense	13,723	13,723	13,723	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	554,485
26														
27	Income before Taxes													
28	Available for return (from above)	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	8,157	97,880
29	Taxable Income (grossed up)	11,447	11,447	11,447	11,447	11,447	11,447	11,447	11,447	11,447	11,447	11,447	11,447	137,359
30														
31	Income Taxes													
32	Current Income Tax	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(13,835)	(166,018)
33	Def Income Tax	17,125	17,125	17,125	17,125	17,125	17,125	17,125	17,125	17,125	17,125	17,125	17,125	205,498
34	Total Income Tax Expense	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	39,480
35														
36														
37	***REVENUE REQUIRMENTS***													
38	Expenses	17,013	17,013	17,013	60,325	60,325	60,325	60,325	60,325	60,325	60,325	60,325	60,325	593,965
39	Return on rate base	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	11,761	141,131
40	Subtotal revenue requirements	28,774	28,774	28,774	72,086	72,086	72,086	72,086	72,086	72,086	72,086	72,086	72,086	735,096
41	Adjustments	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Total revenue requirements	28,774	28,774	28,774	72,086	72,086	72,086	72,086	72,086	72,086	72,086	72,086	72,086	735,096
43														
44	Minnesota share - P90 Factor	14,143	14,143	14,143	35,432	35,432	35,432	35,432	35,432	35,432	35,432	35,432	35,432	361,317

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2024 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	5	3-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - P90 factor	49.152%												
16														
17	**Deferred Tax**													
18	Book depreciation	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	85,527
19	Tax depreciation-Federal	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	800,503
20	Tax depreciation-MN	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	66,709	800,503
21	Federal deferred income taxes	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(11,286)	(135,431)
22	State deferred income taxes	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(5,839)	(70,068)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Outage Management Project Revenue Requirements

Line No.	*Year>>*	2025 Projected Jan	2025 Projected Feb	2025 Projected Mar	2025 Projected Apr	2025 Projected May	2025 Projected Jun	2025 Projected Jul	2025 Projected Aug	2025 Projected Sep	2025 Projected Oct	2025 Projected Nov	2025 Projected Dec	2025 Projected Total
	RATE BASE													
1	Plant Balance	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075	2,259,075
2	Accumulated Depreciation	(135,414)	(142,541)	(149,668)	(156,796)	(163,923)	(171,050)	(178,177)	(185,305)	(192,432)	(199,559)	(206,686)	(213,814)	(213,814)
3	Net Plant in Service	2,123,661	2,116,533	2,109,406	2,102,279	2,095,152	2,088,024	2,080,897	2,073,770	2,066,643	2,059,515	2,052,388	2,045,261	2,045,261
4	**CWIP Calculation:**													
5	Beginning Balance	-	-	-	-	-	-	-	-	-	-	-	-	
6	Additional CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
	Internal Costs													
	Removal of $1M in rate case test year													
7	Closings from CWIP	-	-	-	-	-	-	-	-	-	-	-	-	
8	AFDUC													
9	CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
10	ADIT Federal Proration Factors	0.9178	0.8411	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027	
11	Accumulated Deferred Income Taxes Federal & State	(252,114)	(269,095)	(285,014)	(299,905)	(313,735)	(326,538)	(338,279)	(348,958)	(358,610)	(367,200)	(374,763)	(381,264)	(381,264)
	Accumulated Deferred Income Taxes Federal & State - No Prora	(253,141)	(272,108)	(291,075)	(310,042)	(329,009)	(347,976)	(366,943)	(385,909)	(404,876)	(423,843)	(442,810)	(461,777)	(461,777)
	ADIT - Federal Depreciation	(166,829)	(179,329)	(191,829)	(204,329)	(216,829)	(229,328)	(241,828)	(254,328)	(266,828)	(279,328)	(291,828)	(304,327)	(304,327)
12	Ending rate base	1,871,547	1,847,439	1,824,393	1,802,374	1,781,417	1,761,487	1,742,619	1,724,812	1,708,033	1,692,315	1,677,625	1,663,997	1,663,997
13														
14	Average rate base	147,402	147,402	147,402	147,402	147,402	147,402	147,402	147,402	147,402	147,402	147,402	147,402	1,768,821
15														
16	Return on Rate Base	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	126,935
17														
18	Available for return (equity portion of rate base)	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	88,034
19														
20	***EXPENSES***													
21	*O&M and Depreciation*													
22	Operating Costs	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	49,908	598,896
23	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Book Depreciation	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	85,527
25	Total O&M and Depreciation Expense	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	57,035	684,423
26														
27	Income before Taxes													
28	Available for return (from above)	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	7,336	88,034
29	Taxable Income (grossed up)	10,295	10,295	10,295	10,295	10,295	10,295	10,295	10,295	10,295	10,295	10,295	10,295	123,543
30														
31	Income Taxes													
32	Current Income Tax	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(16,008)	(192,094)
33	Def Income Tax	18,967	18,967	18,967	18,967	18,967	18,967	18,967	18,967	18,967	18,967	18,967	18,967	227,602
34	Total Income Tax Expense	2,959	2,959	2,959	2,959	2,959	2,959	2,959	2,959	2,959	2,959	2,959	2,959	35,509
35														
36														
37	***REVENUE REQUIRMENTS***													
38	Expenses	59,994	59,994	59,994	59,994	59,994	59,994	59,994	59,994	59,994	59,994	59,994	59,994	719,932
39	Return on rate base	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	10,578	126,935
40	Subtotal revenue requirements	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	846,867
41	Adjustments	-	-	-	-	-	-	-	-	-	-	-	-	-
42	Total revenue requirements	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	70,572	846,867
43														
44	Minnesota share - P90 Factor	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	34,688	416,255

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2025 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18% Overall Return										
8														
9		**Book**	**Tax**											
10	Project life (years)	5	3-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - P90 factor	49.152%												
16														
17	**Deferred Tax**													
18	Book depreciation	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	7,127	85,527
19	Tax depreciation-Federal	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	877,408
20	Tax depreciation-MN	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	73,117	877,408
21	Federal deferred income taxes	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(12,500)	(149,998)
22	State deferred income taxes	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(6,467)	(77,604)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	Year>>	2023 Actual January	2023 Actual February	2023 Actual March	2023 Actual April	2023 Actual May	2023 Actual June	2023 Actual July	2023 Actual August	2023 Actual September	2023 Actual October	2023 Actual November	2023 Actual December	2023 Actual Total
	RATE BASE													
1	Plant Balance	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Accumulated Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Net Plant in Service	-	-	-	-	-	-	-	-	-	-	-	-	-
4	CWIP	86,595	110,122	153,133	161,482	181,838	191,141	203,698	226,377	249,213	280,496	307,190	343,250	343,250
5	ADIT - NOL DTA													
6	Reversal of ADIT - NOL DTA													
	Reversal of ADIT - NOL DTA - No Proration													
7	ADIT Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
8	ADIT - Federal & State Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
	Accumulated Deferred Income Taxes Federal & State - No Proratio	-	-	-	-	-	-	-	-	-	-	-	-	-
	ADIT - Federal Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Ending rate base	86,595	110,122	153,133	161,482	181,838	191,141	203,698	226,377	249,213	280,496	307,190	343,250	343,250
10														
11	Average rate base	16,374	16,374	16,374	16,374	16,374	16,374	16,374	16,374	16,374	16,374	16,374	16,374	196,492
12														
13	Return on Rate Base	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	14,101
14														
15	Available for return (equity portion of rate base)	815	815	815	815	815	815	815	815	815	815	815	815	9,779
16														
17	***EXPENSES***													
18	*O&M and Depreciation*													
19	Operating Costs	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Book Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Total O&M and Depreciation Expense	-	-	-	-	-	-	-	-	-	-	-	-	-
23														
24	Income before Taxes													
25	Available for return (from above)	815	815	815	815	815	815	815	815	815	815	815	815	9,779
26	Taxable Income (grossed up)	1,144	1,144	1,144	1,144	1,144	1,144	1,144	1,144	1,144	1,144	1,144	1,144	13,724
27														
28	Income Taxes													
29	Current Income Tax	329	329	329	329	329	329	329	329	329	329	329	329	3,945
30	Deferred Income Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Total Income Tax Expense	329	329	329	329	329	329	329	329	329	329	329	329	3,945
32														
33														
34	***REVENUE REQUIRMENTS***													
35	Expenses	329	329	329	329	329	329	329	329	329	329	329	329	3,945
36	Return on rate base	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	1,175	14,101
37	Subtotal revenue requirements	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	18,045
38	Adjustments													
39	Total revenue requirements	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	1,504	18,045
40														
41	Minnesota share - Hardware (C6)	693	693	693	693	693	693	693	693	693	693	693	693	8,317
42	Minnesota share - Software (P90)	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Total Minnesota Share	693	693	693	693	693	693	693	693	693	693	693	693	8,317

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**										
4	Debt	47.50%	4.63%	2.20%										
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	20	20-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - C6 factor	46.091%												
16	MN share - P90 factor	49.152%												
17														
18	**Deferred Tax**													
19	Book depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Tax depreciation-Federal	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Tax depreciation-MN	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Federal deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-
23	State deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-

Property tax
2023 composite rate 1.13%

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	Year>>	2024 Actual January	2024 Actual February	2024 Actual March	2024 Projected April	2024 Projected May	2024 Projected June	2024 Projected July	2024 Projected August	2024 Projected September	2024 Projected October	2024 Projected November	2024 Projected December	2024 Projected Total
	RATE BASE													
1	Plant Balance	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Accumulated Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Net Plant in Service	-	-	-	-	-	-	-	-	-	-	-	-	-
4	CWIP	374,427	381,795	404,330	468,186	532,042	699,212	866,382	1,033,552	1,200,721	1,367,891	1,535,061	1,702,231	1,702,231
5	ADIT - NOL DTA													
6	Reversal of ADIT - NOL DTA													
	Reversal of ADIT - NOL DTA - No Proration													
7	ADIT Proration Factors	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	1.0000	
8	ADIT - Federal & State Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
	Accumulated Deferred Income Taxes Federal & State - No Proratio	-	-	-	-	-	-	-	-	-	-	-	-	-
	ADIT - Federal Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Ending rate base	374,427	381,795	404,330	468,186	532,042	699,212	866,382	1,033,552	1,200,721	1,367,891	1,535,061	1,702,231	1,702,231
10														
11	Average rate base	69,930	69,930	69,930	69,930	69,930	69,930	69,930	69,930	69,930	69,930	69,930	69,930	839,160
12														
13	Return on Rate Base	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	60,220
14														
15	Available for return (equity portion of rate base)	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	41,765
16														
17	***EXPENSES***													
18	*O&M and Depreciation*													
19	Operating Costs	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Property Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Book Depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Total O&M and Depreciation Expense	-	-	-	-	-	-	-	-	-	-	-	-	-
23														
24	Income before Taxes													
25	Available for return (from above)	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	3,480	41,765
26	Taxable Income (grossed up)	4,884	4,884	4,884	4,884	4,884	4,884	4,884	4,884	4,884	4,884	4,884	4,884	58,611
27														
28	Income Taxes													
29	Current Income Tax	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	16,846
30	Deferred Income Tax	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Total Income Tax Expense	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	16,846
32														
33														
34	***REVENUE REQUIRMENTS***													
35	Expenses	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	1,404	16,846
36	Return on rate base	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	5,018	60,220
37	Subtotal revenue requirements	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	77,066
38	Adjustments													
39	Total revenue requirements	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	6,422	77,066
40														
41	Minnesota share - Hardware (C6)	2,960	2,960	2,960	2,960	2,960	2,252	1,818	1,524	1,312	1,151	1,026	925	24,808
42	Minnesota share - Software (P90)	-	-	-	-	-	755	1,218	1,532	1,758	1,929	2,063	2,170	11,424
43	Total Minnesota Share	2,960	2,960	2,960	2,960	2,960	3,007	3,036	3,055	3,070	3,080	3,089	3,095	36,232

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**										
4	Debt	47.50%	4.63%	2.20%										
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	20	20-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - C6 factor	46.091%												
16	MN share - P90 factor	49.152%												
17														
18	**Deferred Tax**													
19	Book depreciation	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Tax depreciation-Federal	-	-	-	-	-	-	-	-	-	-	-	-	-
21	Tax depreciation-MN	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Federal deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-
23	State deferred income taxes	-	-	-	-	-	-	-	-	-	-	-	-	-

Property tax
2024 composite rate 1.13%

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Advanced Metering Infrastructure Revenue Requirements

Line No.	*Year>>*	2025 Projected January	2025 Projected February	2025 Projected March	2025 Projected April	2025 Projected May	2025 Projected June	2025 Projected July	2025 Projected August	2025 Projected September	2025 Projected October	2025 Projected November	2025 Projected December	2025 Projected Total
	RATE BASE													
1	Plant Balance	1,869,400	2,609,834	3,350,267	3,923,530	4,496,794	5,070,057	5,643,321	6,216,584	6,789,848	7,363,111	7,936,375	8,509,638	8,509,638
2	Accumulated Depreciation	-	(24,483)	(54,685)	(90,607)	(129,461)	(171,249)	(215,970)	(263,624)	(314,210)	(367,730)	(424,183)	(483,569)	(483,569)
3	Net Plant in Service	1,869,400	2,585,351	3,295,582	3,832,923	4,367,332	4,898,808	5,427,351	5,952,961	6,475,637	6,995,381	7,512,192	8,026,069	8,026,069
4	CWIP	-	-	-	-	-	-	-	-	-	-	-	-	-
5	ADIT - NOL DTA													
6	Reversal of ADIT - NOL DTA													
	Reversal of ADIT - NOL DTA - No Proration													
7	ADIT Proration Factors	0.9178	0.8411	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027	
8	ADIT - Federal & State Depreciation	(21,777)	(36,090)	(48,129)	(58,100)	(66,745)	(74,179)	(80,475)	(85,727)	(90,045)	(93,505)	(96,216)	(98,258)	(98,258)
	Accumulated Deferred Income Taxes Federal & State - No Proratio	(23,024)	(39,011)	(53,355)	(66,055)	(77,911)	(88,925)	(99,095)	(108,423)	(116,908)	(124,549)	(131,348)	(137,303)	(137,303)
	ADIT - Federal Depreciation	(15,174)	(25,710)	(35,163)	(43,532)	(51,346)	(58,605)	(65,307)	(71,455)	(77,046)	(82,082)	(86,563)	(90,488)	(90,488)
9	Ending rate base	1,847,623	2,549,260	3,247,453	3,774,824	4,300,587	4,824,629	5,346,876	5,867,234	6,385,593	6,901,876	7,415,975	7,927,812	7,927,812
10														
11	Average rate base	398,025	398,025	398,025	398,025	398,025	398,025	398,025	398,025	398,025	398,025	398,025	398,025	4,776,306
12														
13	Return on Rate Base	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	342,760
14														
15	Available for return (equity portion of rate base)	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	237,717
16														
17	***EXPENSES***													
18	*O&M and Depreciation*													
19	Operating Costs	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Property Tax	-	24,483	30,202	35,922	38,855	41,788	44,721	47,654	50,587	53,520	56,453	59,386	483,569
21	Book Depreciation	15,560	40,043	45,762	51,482	54,415	57,348	60,281	63,214	66,147	69,080	72,013	74,946	670,289
22	Total O&M and Depreciation Expense	15,560	64,526	75,965	87,403	93,269	99,135	105,001	110,867	116,734	122,600	128,466	134,332	1,153,858
23														
24	Income before Taxes													
25	Available for return (from above)	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	19,810	237,717
26	Taxable Income (grossed up)	27,800	27,800	27,800	27,800	27,800	27,800	27,800	27,800	27,800	27,800	27,800	27,800	333,600
27														
28	Income Taxes													
29	Current Income Tax	(15,034)	(7,997)	(6,353)	(4,709)	(3,866)	(3,023)	(2,180)	(1,337)	(494)	349	1,192	2,035	(41,420)
30	Deferred Income Tax	23,024	15,987	14,343	12,700	11,857	11,014	10,171	9,328	8,485	7,642	6,799	5,956	137,303
31	Total Income Tax Expense	7,990	7,990	7,990	7,990	7,990	7,990	7,990	7,990	7,990	7,990	7,990	7,990	95,883
32														
33														
34	***REVENUE REQUIRMENTS***													
35	Expenses	23,550	72,516	83,955	95,393	101,259	107,126	112,992	118,858	124,724	130,590	136,456	142,322	1,249,741
36	Return on rate base	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	28,563	342,760
37	Subtotal revenue requirements	52,114	101,080	112,518	123,957	129,823	135,689	141,555	147,421	153,287	159,153	165,019	170,885	1,592,501
38	Adjustments													
39	Total revenue requirements	52,114	101,080	112,518	123,957	129,823	135,689	141,555	147,421	153,287	159,153	165,019	170,885	1,592,501
40														
41	Minnesota share - Hardware (C6)	6,847	19,156	25,050	31,602	36,263	40,489	44,410	48,110	51,643	55,049	58,355	61,582	478,555
42	Minnesota share - Software (P90)	18,313	29,255	28,592	27,227	25,139	23,516	22,218	21,156	20,272	19,523	18,881	18,323	272,415
43	Total Minnesota Share	25,160	48,411	53,642	58,829	61,403	64,005	66,628	69,266	71,915	74,572	77,235	79,905	750,970

Line No.														
	SUPPORTING INFORMATION / DATA													
1														
2	MN Cap Structure with allowed ROE per order.													
3	Capital Structure	**Ratio**	**Cost**	**WA Cost**							**Property tax**			
4	Debt	47.50%	4.63%	2.20%							2025 composite rate	1.13%		
5	Preferred equity	0.00%	0.00%	0.00%										
6	Common equity	52.50%	9.48%	4.98%										
7	Total	100.00%		7.18%	Overall Return									
8														
9		**Book**	**Tax**											
10	Project life (years)	20	20-year MACRS											
11														
12			**Fed Portion**	**State Portion**										
13	Statutory Tax Rate	28.74%	18.94%	9.80%										
14	Tax conversion factor	1.40335												
15	MN share - C6 factor	46.091%												
16	MN share - P90 factor	49.152%												
17														
18	**Deferred Tax**													
19	Book depreciation	-	24,483	30,202	35,922	38,855	41,788	44,721	47,654	50,587	53,520	56,453	59,386	483,569
20	Tax depreciation-Federal	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	961,278
21	Tax depreciation-MN	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	80,107	961,278
22	Federal deferred income taxes	(15,174)	(10,536)	(9,453)	(8,370)	(7,814)	(7,258)	(6,703)	(6,147)	(5,592)	(5,036)	(4,480)	(3,925)	(90,488)
23	State deferred income taxes	(7,850)	(5,451)	(4,891)	(4,330)	(4,043)	(3,755)	(3,468)	(3,180)	(2,893)	(2,605)	(2,318)	(2,031)	(46,815)

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
O&M Savings due to AMI Implementation

Line No.		2024 Actual Jan	2024 Actual Feb	2024 Actual Mar	2024 Projected Apr	2024 Projected May	2024 Projected Jun	2024 Projected Jul	2024 Projected Aug	2024 Projected Sep	2024 Projected Oct	2024 Projected Nov	2024 Projected Dec	2024 Projected YE
1	***OTP SAVINGS***													
2	Meter Reading Total Expenses (FERC 902)			444,361.49	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	3,707,302.49
3	Opt Out Costs (excludes 902)	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Fees Paid By Opt Out Customers	-	-	-	-	-	-	-	-	-	-	-	-	-
5														
6	Total Savings	-	-	444,361.49	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	3,707,302.49
7														
8	Meter Reading Amount in Base Rates			483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	5,800,784.00
9														
10	***CUSTOMER SAVINGS***													
11	Monthly Difference			39,037.18	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	
12	YTD Savings			39,037.18	159,886.84	280,736.51	401,586.18	522,435.84	643,285.51	764,135.18	884,984.84	1,005,834.51	1,126,684.18	
13	OTP Meter Reading Customer Savings	-	-	39,037.18	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	3,707,302.49
14	Minnesota Share - C7 Meter Reading Allocation F	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%
15	MN Share Meter Reading Savings	-	-	18,971.00	58,729.64	58,729.64	58,729.64	58,729.64	58,729.64	58,729.64	58,729.64	58,729.64	58,729.64	1,801,647.81

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
O&M Savings due to AMI Implementation

Line No.		2025 Projected Jan	2025 Projected Feb	2025 Projected Mar	2025 Projected Apr	2025 Projected May	2025 Projected Jun	2025 Projected Jul	2025 Projected Aug	2025 Projected Sep	2025 Projected Oct	2025 Projected Nov	2025 Projected Dec	2025 Projected YE
1	***OTP SAVINGS***													
2	Meter Reading Total Expenses (FERC 902)	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	1,450,196.00
3	Opt Out Costs (excludes 902)	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Fees Paid By Opt Out Customers	-	-	-	-	-	-	-	-	-	-	-	-	-
5														
6	Total Savings	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	120,849.67	1,450,196.00
7														
8	Meter Reading Amount in Base Rates	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	483,398.67	5,800,784.00
9														
10	***CUSTOMER SAVINGS***													
11	Monthly Difference	362,549	362,549	362,549	362,549	362,549	362,549	362,549	362,549	362,549	362,549	362,549	362,549	
12	YTD Savings	362,549	725,098	1,087,647	1,450,196	1,812,745	2,175,294	2,537,843	2,900,392	3,262,941	3,625,490	3,988,039	4,350,588	
13	OTP Meter Reading Customer Savings	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	362,549.00	1,450,196.00
14	Minnesota Share - C7 Meter Reading Allocation F	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%	48.60%
15	MN Share Meter Reading Savings	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	176,188.92	704,755.67

Federal ADIT Proration

	A	B	C	D	E
		January 2025 - December 2025 Recovery Period			
Line No.	Month	**All Projects' Revenue Requirements without ADIT Prorated**	**All Projects' Revenue Requirements with ADIT-Prorated**	**Difference due to Federal ADIT Proration (B - A)**	
1	Jan-25	$510,057	$510,577	$520	
2	Feb-25	$534,329	$534,849	$520	
3	Mar-25	$540,578	$541,097	$519	
4	Apr-25	$546,524	$547,043	$519	
5	May-25	$548,994	$549,512	$519	
6	Jun-25	$551,491	$552,009	$518	
7	Jul-25	$554,006	$554,524	$518	
8	Aug-25	$556,534	$557,052	$518	
9	Sep-25	$559,071	$559,589	$518	
10	Oct-25	$561,614	$562,132	$518	
11	Nov-25	$564,162	$564,680	$517	
12	Dec-25	$566,713	$567,230	$517	
13	Total	$6,594,074	$6,600,294	$6,220	
14					
15	**Revenue Requirement Related to Federal ADIT**				
16	**Proration-Projection**			**$6,220**	

Otter Tail Power Company
Minnesota Electric Utility Infrastructure Costs
Federal ADIT Proration -- Preserve True-Up Period

	(A)	(B)	(C)	(D)
	January 2024 - December 2024			
Line No.	**Month**	**Original ADIT Balance - All Projects**	**Federal ADIT Prorate Balance - All Projects**	**Difference due to Federal ADIT Proration (B - A)**
1	Jan-24	(233,156)	(29,259)	203,897
2	Feb-24	(271,023)	(123,173)	
3	Mar-24	(301,571)	(181,855)	
4	Apr-24	(326,593)	(233,373)	
5	May-24	(346,921)	(276,869)	
6	Jun-24	(363,771)	(312,448)	
7	Jul-24	(376,879)	(340,195)	
8	Aug-24	(386,583)	(361,384)	
9	Sep-24	(393,383)	(376,390)	
10	Oct-24	(397,608)	(386,163)	
11	Nov-24	(399,652)	(391,045)	
12	Dec-24	(399,713)	(391,193)	8,520
13	Simple Average	(316,435)	(210,226)	106,208
14				
15			Rate Base Rev Req Gross Up Factor	9.18%
16			Total Company Revenue Requirement	$ 9,754
17				
18	**MN Revenue Requirement Related to Federal ADIT**			**$ 3,237**
19	**Proration-Preservation**			
20				
21				
22			Tax Conversion Factor	1.4034 (1/(1-24.4%)
23			Gross Up of Equity %	6.98% (D23 * D31)
24			Equity Return %	4.98% (D31)
25			Gross Up Factor	2.01% (D24 - D25)
26				
27			**Annual**	**Monthly**
28			Debt Return %	2.20% 0.18%
29			Preferred Equity %	0.00% 0.00%
30			Equity Return %	4.98% 0.41%
31			Rate of Return	7.18% 0.60%
32			Tax RR on Equity Return	2.01% 0.17%
33			Rate Base Rev Req Gross Up Factor	9.18% 0.77%

Category	Description	Comments	Page No.
Customer Feedback			
Customer Outreach and Education	Survey results addressing AMI/OMS communications and feedback utilizing the volunteer Otter Voice group of customers	See Attachments 11b-11d for sample AMI customer communications.	3
Customer Engagement	Percentage of Customers with an advanced meter for at least 30 days that receive an energy efficiency bill insert/New AMI options/Future Options	Full deployment began in February 2024: information is not yet available	
Customer Engagement	Estimated percentage of low-income customers with an advanced meter at least 30 days that receive an energy efficiency bill insert/new AMI options/future options	Full deployment began in February 2024: information is not yet available	
Opt-Out and Complaints			
Installation and Deployment	Number of customers electing to opt-out of AMI installation, should an opt-out option be required	No customers have elected to opt out as of April 19, 2024.	
Installation and Deployment	Information on reasons customers choose to opt-out, if available	No customers have elected to opt out as of April 19, 2024.	
Installation and Deployment	Number of non-complaint calls to Customer Service and meter installation vendor regarding meter installation	Otter Tail has 70 logged Customer Contacts regarding AMI installation through March 4, 2024	
Installation and Deployment	Number of complaints to Customer Service regarding AMI installation	Otter Tail has logged six customer complaints regarding AMI.	
AMI Deployment and Budget			
Installation and Deployment	Number of advanced meters installed/in inventory/other uses	As of April 15, 2024: AMI meters installed: 40,224 AMI meters in stock: 75,000 AMI meters dedicated for testing purposes: 250	
Installation and Deployment	Percentage of advanced meters deployed compared to planned installation	As of March 4, 2024, meter installation is ahead of schedule. Otter Tail expected to have 7 percent of its meters replaced and has replaced 9 percent.	
Installation and Deployment	Percentage of customers with advanced meters	As of March 4, 2024, 7 percent of Otter Tail customers have an AMI meter installed on their account.	
Installation and Deployment	Number of missed installation appointments	A scheduled AMI installation appointment has not been missed.	
Financial	Total AMI project capital spend to-date vs. total AMI project capital budget	The AMI project budget is $55.9 million. Total project spend through March 2024 is $38.5 million.	
Financial	Total annual AMI O&M spend to-date vs. projected annual AMI O&M	Total AMI O&M spend in 2023 was $33,529. Actual spend from January to March 2024 is $128,384. Projected total spend for 2024 is $747,522.	
FAN Deployment and Budget			
Installation and Deployment	Percentage of FAN deployed	FAN deployed is 100 percent. FAN installations occurred June '23 - August '23.	
Installation and Deployment	Percentage of FAN deployed compared to planned installation	FAN deployed compared to planned installation is 100 percent. FAN installations occurred June '23 - August '23.	

Category	Description	Comments	Page No.
AMI Customer Data			
Post-Deployment	Total number of AMI meters used for billing (activated)	Meters are actively being installed. There are over 40,000 meters installed to date. All installed meters are activated and used for the next account billing cycle.	
Post-Deployment	Percentage of customers with transmitting advanced meters that receive estimated bills	Full deployment began in February 2024: information is not yet available.	
Post-Deployment	Number of customers with an advanced meter with an active web portal account		4
Post-Deployment	Number of monthly, unique visits to the web portal (My Account)		4
Customer Engagement	Customer access to hourly or sub-hourly data		4
Customer Engagement	Provide information on the type of data available to customers and the format in which they have access		4
Post-Deployment	Percentage of customers with an advanced meter that have made a complaint of inaccurate meter readings	Full deployment began in February 2024, billings have just begun. No complaints at this time	
Post-Deployment	Meter accuracy test percentage	Full deployment began in February 2024. All meters must pass Lot Acceptance testing prior to release for deployment.	
Post-Deployment	Percentage of interval reads received (versus reads where data is not properly received)	Full deployment began in February 2024: information is not yet available	
Customer Engagement	Third-party service access to customer data for reports or studies	Current AMI data is not being shared with third-party services.	
AMI Post Deployment			
AMI (Capital)	AMI meter failure rate	Full deployment began in February 2024: information is not yet available	
AMI (O&M)	Annual trips for damaged customer equipment	Full deployment began in February 2024: information is not yet available	
AMI (O&M)	Annual trips for residential manual disconnection (not opt-out)	Full deployment began in February 2024: information is not yet available	
AMI (O&M)	Annual trips for residential manual reconnection (not opt-out)	Full deployment began in February 2024: information is not yet available	
Savings			
Financial	O&M cost savings from avoided field visits	Otter Tail expects savings to start in 2024 as more meters are installed.	
Post-Deployment	Number of avoided truck rolls/field visits	Full deployment began in February 2024: information is not yet available	
TOU Rates			
Post-Deployment	Number of customer/account inquiries regarding AMI or time-varying rates	Otter Tail has 70 logged Customer Contacts regarding AMI installation through March 4, 2024.	
Customer Engagement	Number of customers with advanced meters that adopt an advanced rate option (e.g. TOU) tariff, expressed as a number and percentage by each rate		5
Post-Deployment	Number of customers enrolled in time-varying rate programs		5
OMS Deployment			
Financial	Total OMS project capital spend to-date vs. total OMS project capital budget		6
Financial	Total annual OMS O&M spend to-date vs. projected annual OMS O&M		6
Post-Deployment	Number of unique visits to the updated Outage Map	The otpco.com/outages site has 37,774 unique users with 108,906 total page views since deployment.	
Post-Deployment	Information on how customers are reporting Outages		3
Post-Deployment	Customer-minutes of interruption - major events		7
Post-Deployment	Customer-minutes of interruption -single customer events		7
Post-Deployment	Customer-minutes of interruption -tap level events		7
Post-Deployment	Customers Enrolled in Outage Alerts	48,666 customers are enrolled in outage alerts.	
Post-Deployment	IVR Call Capture	No information before deployment in December 2022.	8

Customer Feedback

AMI

Prior to the Phase-1 Full Deployment in mid-February 2024, customers began receiving mailers preparing them for the upcoming meter exchanges. Otter Tail's public facing AMI webpage can be found at https://www.otpco.com/ami/.

The Minnesota customer mailer is sent six weeks before meter installation and is included as Attachment 11b to this filing. A post card sent two weeks prior to installation is included as Attachment 11c, and Attachment 11d shows the post card sent after intallation is complete.

Otter Tail also uses social media and the Customer Connect newsletter to keep customers updated on the progress of AMI.

OMS

In early 2022, Otter Tail formed Otter Voice, a community of Otter Tail customers who opted in to the group to provide Otter Tail feedback on initiatives and give insight for areas needing improvement. The feedback from this community helps Otter Tail continue to improve its human-centered design approach, to which the Company is committed.

On December 12, 2022, shortly after the OMS had been implemented, Otter Tail experienced a large outage due to a significant snowstorm. Otter Tail surveyed the Otter Voice group to gather information about their outage experiences during that specific December storm. If the customer did experience an outage, we asked them to recall to the best of their ability the reason for the outage, the duration, whether they contacted Otter Tail to report it, what time of day it was, and where they sought information about the outage outside of calling in. In other words, Otter Tail wanted to know if the customer attempted to self-serve by utilizing Otter Tail's outage map, social media, or other online tools or information. We then asked the Otter Voice group to rate their overall satisfaction with Otter Tail, specifically as it related to the contact made during the storm. We also inquired about their expectations of restoration times, any restoration updates they received, and which types of notifications are most relevant to them during outages.

Of the 249 Otter Voice participants who responded to the survey, 189 were impacted by the December 2022 storm, with 121 indicating they did not contact Otter Tail directly to report the outage and 68 respondents indicating that they did contact Otter Tail to report the outage.

- Of those affected by the storm, 29% recall their outage lasting just a few minutes, 40% were out for several hours, 15% for an extended period, and 16% couldn't recall the length of the outage.

- Of the 36% of customers surveyed who were impacted by the outage and contacted us directly during that time, 88% also used Otter Tail's website and outage map for more information.

- Of those who did not contact Otter Tail directly, 41% used either the Otter Tail website or outage map.

The 249 responding Otter Voice members also told us that 83% of them expect to be notified of an estimated restoration time either immediately, 15-30 minutes after reporting, or at most, within an hour of reporting the outage.

- 76% said real time outage restoration updates are important to them.

- The notifications that are most important to them (in order) are 1) the estimated restoration time; 2) knowing a crew is on site to work the problem; 3) knowing there is an outage; 4) the cause of the outage and that a crew is on the way to restore power; and 5) knowing the power has been restored.
- 62% of the 249 respondants want to see a more informational outage page, including outage tips and safety messages.
- 75% of Otter Tail customers prefer receiving text notifications, 16% prefer email, and 9% like the use of an automated phone call.

In December 2023, certain areas of Otter Tail's service territory were impacted by an ice storm which caused extended outages. Otter Tail is currently conducting another survey of the Otter Voice Community regarding their experience during that outage.

Since the new MyMeter customer engagement portal went live on August 29, 2023, Otter Tail has initiated over 55,000 'out of power' notifications and over 12,000 'time of restoration' updates, for data ending March 8, 2024.

AMI Customer Data

Otter Tail is currently working through the integration that will bring AMI interval data to Otter Tail's My Account portal. This will allow customers to slice the data in 15-minute, 30-minute, hourly, daily, weekly, and monthly intervals. Otter Tail has approximately 44,000 logins to the portal, with around 38,000 of those being unique registrations.

There is a MyMeter™ mobile app available which provides essentially the same information that Otter Tail's web version of My Account does. The app has not been promoted up to this point, but the app has around 140 logins each month. Otter Tail does plan to expand our efforts to share the mobile app information with customers and expects this number to grow significantly over the course of the next few months.

My Account Portal

Otter Tail's My Account Portal experience includes extensive charting which allows customers to see up to two years of historical data from both the consumption (kWhs) and billing amount ($) viewpoints. Customers are able to filter dates and extract the data needed. A usage heat map is available that shows the customer year over year data such as usage and billing comparison points from month to month. Customers are able to view and pay their bill. There are two years of bill PDFs available for customers and an extensive history of their account transactions. Customers are easily able to manage their wallets and any associated auto pay profiles. Otter Tail has also integrated direct paths for more self-service like Start, Stop, and Transfer, as well as the ability to make payment arrangements online and to update mailing address and phone numbers. Customers can easily upload their readings if they are currently set up as self-read customers. Those readings require no further manual intervention and are immediately uploaded into Otter Tail's billing table, ready for the next billing date. Since going live with My Account, several enhancements have been made, including more direct paths to enroll in budget billing, information on heating and cooling technologies, and any associated potential rebates, as well as a more targeted effort to encourage enrollment in auto pay.

The portal also operates as the main hub for all billing, outage, and load management alerts. Customers can choose which accounts they would like to receive alerts for and how they would like to receive the alerts, such as text, email, or both.

AMI interval data, which will be presented later in 2024 for most rates, will allow customers to set threshold notifications, which will alert them if their usage exceeds a predetermined amount. This feature will assist customers in controlling their electricity costs. Interval data for more complex rates will likely be available in early 2025.

TOD/TOU Rate	Rate Schedule	Description	2021 Non-AMI meters	2022 Non-AMI meters	2023 AMI meters	2023 Non-AMI meters	2023 Total Meters	Percent AMI Customers on Advanced Rates
430	10.07	Secondary Service 3rd party provider with RECS	0	1	0	3	3	0%
431	10.07	Primary Service 3rd party provider with RECS	0	0	0	0	0	0%
448	10.07	Secondary Service Company provider with RECS	0	0	0	0	0	0%
704	11.02	Irrigation Option 2 Time of Use	145	145	0	146	146	0%
708	10.03	General Service Time of Use	43	42	0	42	42	0%
611	10.05	LGS TOD - Secondary	18	20	0	19	19	0%
610	10.05	LGS TOD - Primary	6	6	0	6	6	0%
639	10.05	LGS TOD - Transmission	8	7	0	7	7	0%

Original OMS Capital Budget
$848,500

OMS Capital Expenditures				
2021	2022	2023	2024 Forecast	Total
$25,120	$552,600	$200,162	$0	$777,882

OMS O&M Expenses				
2021	2022	2023	2024 Forecast	Total
$0	$97,704	$465,484	$103,000	$666,188

Otter Tail OMS deployed on 12/12/23	2021	2022	2023	2024 through February
Customer minutes - Major Event Day (MED)		0	5,854,131	0
Customer minutes - single customer		7,156	70,442	19,184
Customer minutes - tap level		4,034,887	55,324,410	2,028,756
Old Itron IMS - feeder level - MED	2,985,915	4,042,043	5,450,407	

IVR Performance by Month - Report an Outage							
Row Labels	IVR Calls	After-Hours Calls	Manual Calls	Total Calls	Percent IVR	Percent After-Hours	Percent Manual
2022	**1,434**	**0**	**312**	**1,746**	**82.13%**	**0.00%**	**17.87%**
Dec	1,434	0	312	1,746	82.13%	0.00%	17.87%
2023	**11,090**	**260**	**1,921**	**13,271**	**83.57%**	**1.96%**	**14.48%**
Jan	790	0	149	939	84.13%	0.00%	15.87%
Feb	419	0	66	485	86.39%	0.00%	13.61%
Mar	672	1	155	828	81.16%	0.12%	18.72%
Apr	745	0	159	904	82.41%	0.00%	17.59%
May	1,052	0	241	1,293	81.36%	0.00%	18.64%
Jun	1,510	0	260	1,770	85.31%	0.00%	14.69%
Jul	1,210	1	224	1,435	84.32%	0.07%	15.61%
Aug	862	0	206	1,068	80.71%	0.00%	19.29%
Sep	1,008	0	170	1,178	85.57%	0.00%	14.43%
Oct	770	70	88	928	82.97%	7.54%	9.48%
Nov	436	64	78	578	75.43%	11.07%	13.49%
Dec	1,616	124	125	1,865	86.65%	6.65%	6.70%
2024	**785**	**41**	**98**	**924**	**84.96%**	**4.44%**	**10.61%**
Jan	392	0	58	450	87.11%	0.00%	12.89%
Feb	204	10	38	252	80.95%	3.97%	15.08%
Mar	189	31	2	222	85.14%	13.96%	0.90%
Grand Total	**13,309**	**301**	**2,331**	**15,941**	**83.49%**	**1.89%**	**14.62%**

Why advanced meters benefit you

AMI is a technology upgrade that lays the groundwork for us to better meet your needs for reliable service. When combined with the systems we have in place today—and those we've identified for future implementation—you'll have more visibility into your energy use (helping you save energy and money) and we'll be able to respond to outages faster and more precisely.

Long term, advanced meters help us keep your costs low and will provide insight into new on- or off-peak rate options that can help you save money.

How we install advanced meters

Meter upgrades are quick and easy.

We've contracted with Allegiant Utility Services, whose employees will install the new meter on our behalf in approximately six weeks. The process will take about five minutes, during which we'll safely pause your electric service for less than a minute. Please make sure there isn't anything preventing access to your current meter. Other than that, you don't need to do anything to prepare for this meter upgrade.

You can expect to see an Allegiant employee (with photo ID) sometime between 8 a.m. and 5 p.m., Monday through Saturday. If they have any difficulty accessing your meter, they'll leave a door hanger requesting you call to schedule an installation date and time. Thank you for accommodating Allegiant employees as they help us improve our service to you.

Curious about opting out of advanced meter communication abilities?

All customers in our service area will receive a new advanced meter.

Residential customers on our standard rates can choose to opt out of the benefits associated with advanced meter technology. While we'll still upgrade your meter to an advanced meter, we'll disable meter communications. An advanced meter with communication ability transmits information wirelessly to us. Because we need to read non-communicating meters manually with an on-site visit, there's a monthly meter reading fee for customers who choose to disable meter communications. With a non-communicating meter, you'll also have limited energy use information.

Opting out of advanced meter technology limits our efficiency and overall customer savings. A one-time fee of $226.82 and an ongoing monthly fee of $80.10 applies to customers who opt-out of advanced meter technology.

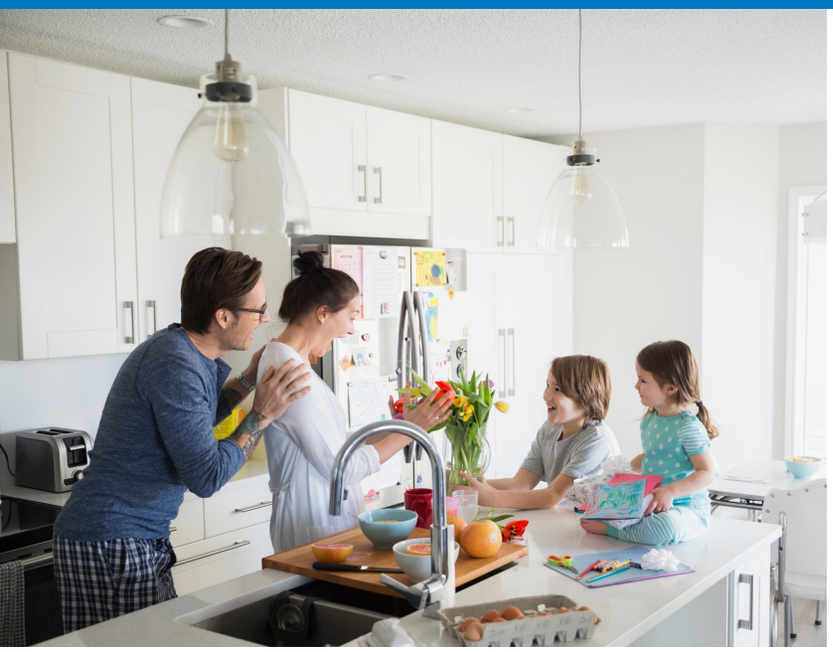
We've based these fees on the average costs for turning off the communicating radio in the meter, manual meter reading, and reactivating the communicating radio if you move or later choose to receive AMI services. You'll see these fees added to your regular electric service bill.

To opt out of advanced meter technology, please call us at 800-257-4044.

Learn more

For additional information, please visit otpco.com/MeterUpgrade or call us at 800-257-4044.

We're upgrading your electric meter



In approximately six weeks, we'll upgrade your electric meter to an advanced meter with Advanced Metering Infrastructure (AMI).

Learn more inside!

MN 12/23

New meter coming soon!

As your energy provider, our primary responsibility is to provide you with safe, reliable, and cost-effective electricity. Technologies continue to advance, and we're taking the necessary steps to help us power your life for decades.

OTTER TAIL POWER COMPANY
215 South Cascade St
Fergus Falls MN 56537

Setting the base for a stronger energy system and future

We've powered our communities for more than a century. As technologies advance, we're taking the necessary steps to continue delivering safe, reliable, and cost-effective electricity.

Advancements to our energy system help us provide new tools for you to save energy and money. This includes transitioning to technologies like Advanced Metering Infrastructure (AMI).

OTTER TAIL POWER COMPANY

215 South Cascade St
Fergus Falls MN 56537

New meter coming soon!

In approximately two weeks, we'll upgrade your electric meter to an advanced meter with Advanced Metering Infrastructure (AMI).

AMI is a technology upgrade that lays the groundwork for us to better meet your needs for reliable service. When combined with the systems we have in place today—and those we've identified for future implementation—you'll have more visibility into your energy use (helping you save energy and money) and we'll be able to respond to outages faster and more precisely.

Long term, advanced meters help us keep costs low (savings we pass along to our customers) and will provide insight into new rate options that can help you save money.

How we install advanced meters

Meter upgrades are quick and easy.

We've contracted with Allegiant Utility Services, whose employees will install the new meter on our behalf. The process will take about five minutes, during which we'll safely pause your electric service for less than a minute. Please make sure there isn't anything preventing access to your current meter.

You can expect to see an Allegiant employee (with photo ID) in approximately two weeks, sometime between 8 a.m. and 5 p.m., Monday through Saturday. If they have any difficulty accessing your meter, they'll leave a door hanger requesting you call to schedule an installation date and time. Thank you for accommodating Allegiant employees as they help us improve our service to you.

Learn more

For additional information, please visit otpco.com/MeterUpgrade or call us at 800-257-4044.

You have a new meter

We recently stopped by and upgraded your electric service meter to an advanced meter.

OTTER TAIL POWER COMPANY

Why an advanced meter benefits you

Advanced Metering Infrastructure (AMI) is a technology upgrade that lays the groundwork for us to better meet your needs for reliable service. When combined with the systems we have in place today—and those we've identified for future implementation—you'll have more visibility into your energy use (helping you save energy and money), and we'll be able to respond to outages faster and more precisely.

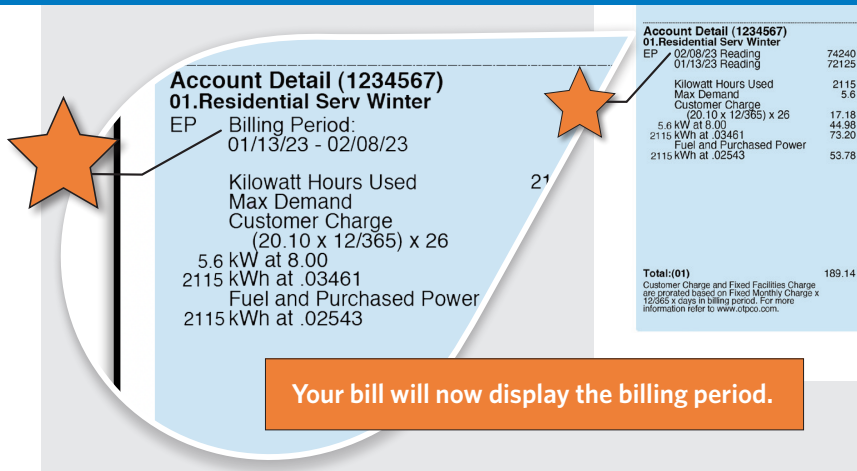
Long term, advanced meters help keep your costs low and provide insight into new rate options that can help you save money.

How we'll use meter data

We use meter data to generate bills, inform outage restoration efforts, model current and new rate designs that can better meet your needs, and support reliability and system improvements.

Learn more

For additional information, please visit **otpco.com/MeterUpgrade** or call us at **800-257-4044**.



How your electric bill will change

Now that the meter is upgraded, your monthly electric bill will look a bit different. While the location of some charges on your bill will move, this layout change won't affect your electric rates.

Prior to advanced meters, we stated current and previous meter readings on each bill. Now your bill will note the billing period dates and won't include meter readings.

OTTER TAIL POWER COMPANY

215 South Cascade St
Fergus Falls MN 56537

Setting the base for a stronger energy system and future

Advancements to our energy system help us provide new tools for you to save energy and money. This includes transitioning to technologies like **Advanced Metering Infrastructure (AMI)**.

As your energy provider, we're committed to meeting your needs for reliable service and the continuous improvement of our systems. AMI is the next step toward building a stronger electrical system and allowing us to continue delivering safe, reliable, and cost-effective energy for decades.

Name
Address
Address
City State Zip

Attachment 12
Redline and Clean Versions of
Tariff Sheet Section 13.11 – Electric Utility Infrastructure Cost Recovery Rider, Electric Rate Schedule

ELECTRIC UTILITY INFRASTRUCTURE COST (EUIC) RECOVERY RIDER

DESCRIPTION	RATE CODE	
Residential	MEURS	
Residential RDC	MEURC	
Farm	MEUFM	
Small General Service (Under 20 kW)	MEUGS	C
General Service (20 kW or Greater)	MEUG1	N
General Service TOU	MEUGU	
Large General Service – Primary / Transmission	MEULP	
Large General Service – Secondary	MEULS	
Irrigation Service	MEUIR	
Outdoor Lighting (Metered)	MEULT	~~C~~
OPA (Metered)	MEUOP	~~C~~
Controlled Service Deferred Load	MEUCD	
Controlled Service Interruptible Self Contained	MEUCS	
Controlled Service Interruptible CT Metering	MEUCT	
Controlled Service Off Peak	MEUCO	

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's metered retail rate schedules.

COST RECOVERY CHARGE: There shall be included on each Minnesota Customer's monthly bill an Electric Utility Infrastructure Cost (EUIC) Recovery per meter charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

RATE:

Service Category	Section	Per Meter Charge	
Residential	9.01	$2.74~~1.43~~	R
Residential RDC	9.02	$6.40~~3.47~~	R
Farm	9.03	$8.39~~3.40~~	R
Small General Service (Under 20 kW)	10.01~~, 10.02~~	$4.41~~5.52~~	CR
General Service (20 kW or Greater)	10.02	$17.39	NR
General Service - TOU	10.03, 10.07	$28.17~~11.33~~	NR
Large General Service - Primary / Transmission	10.04, 10.05, 10.06, 11.01	$150.71~~41.24~~	R
Large General Service - Secondary	10.04, 10.05, 10.06, 11.01	$27.29~~13.31~~	R
Irrigation Service	11.02	$14.78~~9.31~~	R
Outdoor Lighting (Metered)	11.03	$2.95~~3.54~~	R
OPA (Metered)	11.05	$7.33~~3.96~~	~~C~~R
Controlled Service Deferred Load	14.01, 14.06	$6.40~~3.47~~	~~C~~R
Controlled Service Interruptible – Self-Contained	14.04	$6.52~~3.54~~	R
Controlled Service Interruptible – CT Metering	14.04	$29.58~~14.24~~	R
Controlled Service Off Peak	14.07, 14.12	$8.28~~4.33~~	R
			R

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.

ELECTRIC UTILITY INFRASTRUCTURE COST (EUIC) RECOVERY RIDER

DESCRIPTION	RATE CODE
Residential	MEURS
Residential RDC	MEURC
Farm	MEUFM
Small General Service (Under 20 kW)	MEUGS
General Service (20 kW or Greater)	MEUG1
General Service TOU	MEUGU
Large General Service – Primary / Transmission	MEULP
Large General Service – Secondary	MEULS
Irrigation Service	MEUIR
Outdoor Lighting (Metered)	MEULT
OPA (Metered)	MEUOP
Controlled Service Deferred Load	MEUCD
Controlled Service Interruptible Self Contained	MEUCS
Controlled Service Interruptible CT Metering	MEUCT
Controlled Service Off Peak	MEUCO

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N

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

APPLICATION OF RIDER: This rider is applicable to electric service under all of the Company's metered retail rate schedules.

COST RECOVERY CHARGE: There shall be included on each Minnesota Customer's monthly bill an Electric Utility Infrastructure Cost (EUIC) Recovery per meter charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

RATE:

Service Category	Section	Per Meter Charge	
Residential	9.01	$2.74	**R**
Residential RDC	9.02	$6.40	**R**
Farm	9.03	$8.39	**R**
Small General Service (Under 20 kW)	10.01	$4.41	**CR**
General Service (20 kW or Greater)	10.02	$17.39	**NR**
General Service - TOU	10.03, 10.07	$28.17	**NR**
Large General Service - Primary / Transmission	10.04, 10.05, 10.06, 11.01	$150.71	**R**
Large General Service - Secondary	10.04, 10.05, 10.06, 11.01	$27.29	**R**
Irrigation Service	11.02	$14.78	**R**
Outdoor Lighting (Metered)	11.03	$2.95	**R**
OPA (Metered)	11.05	$7.33	**R**
Controlled Service Deferred Load	14.01, 14.06	$6.40	**R**
Controlled Service Interruptible – Self-Contained	14.04	$6.52	**R**
Controlled Service Interruptible – CT Metering	14.04	$29.58	**R**
Controlled Service Off Peak	14.07, 14.12	$8.28	**R**
			R

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.

Customer notice

The Minnesota Public Utilities Commission approved an adjustment to our Electric Utility Infrastructure Cost (EUIC) Rider. The approved per-meter charges become effective on January 1, 2025, for all customer classes.

This rider recovers costs associated with Automated Metering Infrastructure, an Outage Management System, and a Demand Response System.

Class	**Section**	**Effective *January 1, 2025,* per-meter charge**
Residential	9.01	$2.74
Residential RDC	9.02	$6.40
Farm	9.03	$8.39
Small General Service (Under 20 kW)	10.01	$4.41
General Service (20kW or Greater)	10.02	$17.39
General Service TOU	10.03, 10.07	$28.17
Large General Service - Primary / Transmission	10.04, 10.05, 10.06, 11.01	$150.71
Large General Service - Secondary	10.04, 10.05, 10.06, 11.01	$27.29
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Outdoor Lighting (Metered)	11.03	$2.95
OPA (Metered)	11.05	$7.33
Controlled Service Deferred Load	14.01, 14.06	$6.40
Controlled Service Interruptible - Self Contained	14.04	$6.52
Controlled Service Interruptible - CT Metering	14.04	$29.58
Controlled Service Off Peak	14.07, 14.12	$8.28

For more information, contact Customer Service at 800-257-4044 or visit otpco.com.

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Petition to Implement Electric Utility Infrastructure Cost Recovery Rider for Advanced Metering Infrastructure / Outage Management System / Demand Response System, Rate Schedule 13.11
Docket No. E017/M-24-

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert 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
Initial Filing

Dated this **3rd** day of **May, 2024**.

/S/ LAURA DEWEY
Laura Dewey
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8406

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
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	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Cary	Stephenson	cStephenson@otpco.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC
Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2024 EUIC