

Ex Parte Communication Report

Date:

To: Public Ex Parte Communication File

Docket No:

Case Name:

From: PUC Staff:

RE: Permissible Ex Parte Communications Pursuant to Minn. Rules, Part 7845.7400.

1. Type of communication: (Oral or Written)

If written, attach the document.

If oral, Date:

Time:

NOTE: In both instances, please notify the Maker the communication has been submitted for inclusion in the record.

2. Maker of the Communication:

3. Recipient of the Communication:

4. For communications involving the setting of interim rates or the review of compliance filings, the topic was:

5. For all other permissible communications that are prohibited for the Commissioners under Minn. Rules, part 7845.7200, the substance of the communication was:

6. For oral permissible ex parte communications, has a copy of this memo been sent to the assigned Administrative Law Judge? Yes No N/A

RE: 23-380 EVCR question

From Grenier, Jason <jgrenier@otpc.com>

Date Sat 1/17/2026 12:12 PM

To Li, Austin (PUC) <Austin.Li@state.mn.us>

Hi Austin,

The Company believes that voluntary riders, that provide monthly credits, like the EVCR, Air Conditioning Control rider (Section 14.08), and Water Heater Control rider (Section 14.01) are excellent single meter off-peak solutions for customers, but when applied to Residential TOD rates, could result in a poor customer experience and create unintentional price signals. As described in the Company's December 4th comments in the EVCR docket, the Company believes EVCR direct load control and Residential TOD pricing periods could operate in conflict with each other. It is possible the Company could release a customer from EVCR direct load control (customer can begin charging again) while in an on-peak period for Residential TOD. In this scenario, if the customer needed EV charging they would be forced to charge in a higher priced on-peak period. The Company also believes that providing a monthly \$9 credit under the EVCR program to a Residential TOD customer could create unintended customer behavior. Specifically, customers may interpret the monthly credit as an implicit allowance to operate EV charging equipment during on-peak pricing periods, undermining the price signal established under the Residential TOD rate. While the EVCR direct load control program and the Residential TOD program are both excellent single meter solutions for customers who desire to participate in more dynamic pricing solutions, the Company believes they should not be both utilized together by a customer. The Company also has concerns that a customer participating in both programs would essentially be doubling up on incentives. The customer would receive access to lower cost kWh pricing on the Residential TOD rate and also would receive a bill credit on the EVCR program, when they are likely already avoiding peak periods.

Please let me know if you'd like any more clarification on this one or others.

Jason Grenier
Otter Tail Power Co.

From: Li, Austin (PUC) <Austin.Li@state.mn.us>

Sent: Thursday, January 15, 2026 3:03 PM

To: Grenier, Jason <jgrenier@otpc.com>

Subject: Re: 23-380 EVCR question

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Hi Jason,

Thanks for the clarification. I have additional questions regarding the suggestion by the CEG of offering the residential TOU pilot to the prospective EVCR program customers. While Otter Tail noted in its reply comments that it currently does not see this offering as doable, it notes that such an offering would first require more careful consideration

Which specific docket number is being referenced for the residential TOU pilot?

If Otter Tail were to consider this offering, how would this affect the existing approved residential TOU pilot? Would this then entail additional modifications to the pilot?

Thank you,

Austin Li (he/him)

Economic Analysis Unit, Department of Energy Fellow

Office 651-201-2232

Email austin.li@state.mn.us

121 7th Place East, St. Paul MN 55101

mn.gov/puc

From: Grenier, Jason <jgrenier@otpc.com>

Sent: Thursday, January 15, 2026 10:43 AM

To: Li, Austin (PUC) <Austin.Li@state.mn.us>

Subject: RE: 23-380 EVCR question

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Hello Austin,

Thank you for the question. It's always good to clarify these things on the front end.

Otter Tail will not be seeking a tariff modification, with the MPUC, to offer the \$500 level 2 charging rebate for the EVantage (EVCR) program. The \$500 rebate for level 2 charging equipment is currently offered through Otter Tail's ECO programming. We have already informed the Department of Commerce's ECO of the EVCR filing and we have agreed that Otter Tail will need to file an ECO program modification with the Department, requesting approval of the \$500 level 2 rebate to be extended to the new EVCR program. Of course, this is predicated on the MPUC approving the EVCR program.

Please let me know if you have any additional questions.



Jason
Grenier

Manager

Retail
Energy

Solutions

218-739-
8639

otpc.com



From: Li, Austin (PUC) <Austin.Li@state.mn.us>
Sent: Thursday, January 15, 2026 9:34 AM
To: Grenier, Jason <jgrenier@otpc.com>
Subject: 23-380 EVCR question

This Message Is From an External Sender

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Hello,

I hope this email finds you well. I would like to ask for clarification on Otter Tail's petition in docket 23-380 regarding the EV credit rider program. I understand that Otter Tail agrees with the suggestion by the Clean Energy Groups (CEGs) to offer the Level 2 EV Charging \$500 rebate extension to the EVCR program's prospective customers. Would Otter Tail also be seeking a tariff modification for this?

I will file your response as ex parte.

Thank you,

Austin Li (he/him)

Economic Analysis Unit, Department of Energy Fellow

Office 651-201-2232

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