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June 30, 2014



Dr. Burl Haar  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, MN 55101-2147

**Re: In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits  
Docket No. E999/CI-04-1616  
COMMENTS**

Dear Dr. Haar:

Enclosed for filing in the above-referenced matter are Otter Tail Power Company's ("Otter Tail's") Comments.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the service list for this docket. A Certificate of Service is also enclosed.

Thank you for the opportunity to comment on RES eligibility of imported Michigan RECs. If you have any questions regarding this filing, please contact me at (218) 739-8417 or at [bhdraxten@otpc.com](mailto:bhdraxten@otpc.com).

Sincerely,

*/s/ BRIAN DRAXTEN*  
Brian Draxten  
Manager, Resource Planning

wao  
Enclosures  
By electronic filing  
c: Service List

**STATE OF MINNESOTA  
BEFORE THE  
MINNESOTA PUBLIC UTILITIES COMMISSION**

In the Matter of a Commission Investigation  
into a Multi-State Tracking and Trading System  
for Renewable Energy Credits

Docket No. E999/CI-04-1616

**OTTER TAIL POWER COMPANY  
COMMENTS**

Otter Tail Power Company (“Company”) is filing these Comments in response to the Commission’s May 28, 2014 Notice of Comment Period on REC Eligibility in the above-captioned matter.

- I. M-RETS’ decision to allow the importing of Michigan RECs.**
- II. Whether the Commission should determine that wind and solar RECs imported from the Michigan tracking system are eligible for Minnesota RES Compliance if 1 MWh equals one Renewable Energy Certificate.**
- III. Whether the Commission should state that other types of RECs from the Michigan Tracking system, such as hydroelectric and biomass RECs, would need specific approval from the Commission prior to a Minnesota utility retiring them for Minnesota RES compliance.**

Otter Tail Power Company supports M-RETS decision to allow the importing of Michigan RECs. The Company would encourage the Commission to determine that wind and solar RECs imported from the Michigan tracking system are eligible for Minnesota RES Compliance if 1 MWh equals one Renewable Energy Certificate. To reduce the administrative burden, the Company does not feel it is necessary for the Commission to approve the eligibility of other types of RECs (hydroelectric, biomass, etc.) imported from the Michigan Tracking system prior to a Minnesota utility retiring them for Minnesota RES compliance as long as the RECs meet the Minnesota statutory definition of “eligible energy technology” as found in 216B.1691 subd. (1) (a).

Thank you for your consideration of these comments.

Dated: June 30, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ BRIAN DRAXTEN

Brian Draxten  
Manager, Resource Planning  
Otter Tail Power Company  
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## CERTIFICATE OF SERVICE

**Re: In the Matter of a Commission Investigation into a Multi-State Tracking and Trading System for Renewable Energy Credits  
Docket No. E999/CI-04-1616**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar 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  
COMMENTS**

Dated this **30th** day of **June 2014**.

/s/ WENDIA. OLSON

Wendi A. Olson  
Regulatory Filing Coordinator  
Otter Tail Power Company  
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