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April 5, 2024

Mr. Will Seuffert  
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 the Distribution System Planning for Otter Tail Power Company**  
**Docket No. E017/M-23-380**  
**Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments in the above-referenced matter.

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 218-739-8565 or at [mriewer@otpc.com](mailto:mriewer@otpc.com).

Sincerely,

/s/ *MICHAEL RIEWER*  
Michael Riewer  
Manager, System Infrastructure and Reliability

sjw  
Enclosures  
By electronic filing  
c: Service List

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

**In the Matter of the Distribution  
System Planning for Otter Tail  
Power Company**

**Docket No. E017/M-23-380**

**REPLY COMMENTS**

**I. INTRODUCTION**

Otter Tail is excited to share the various activities and projects related to the distribution system with the Commission and other stakeholders through the Integrated Distribution Plan proceeding. Otter Tail's IDP directly reflects our mission statement throughout; To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business.

Below, we have provided reply comments to the Minnesota Department of Commerce, Division of Energy Resource's (Department) questions and believe they cover any outstanding items. Otter Tail looks forward to continued dialog and engagement from all interested stakeholders in this proceeding.

**II. OTTER TAIL RESPONSES**

***A. The Department requests that OTP discuss in reply comments how OTP selected its DRMS vendor, if applicable, including whether costs and benefits were weighed prior to vendor selection, and that OTP present its cost-benefit analysis for the DRMS project, if available.***

In 2021 Otter Tail formed a specialized team representing key areas of the DR program and retained a consultant to advise this team.

The team attended international industry conferences held in the United States, during which private 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, their innovations and areas of growth, their personal experiences contracting with the major vendors, and their experiences using the vendors' DR platforms.

This preparatory work culminated in a Request for Proposals released in the Fall of 2022. Six responses were received from major vendors in the DR industry. Written responses were scored. Vendors were interviewed. Demonstrations with the short-listed vendors were held. Follow up interviews were held with vendors. 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 OATI.

The Company has previously partnered with L+G to provide the communications backbone used for its Advanced Metering Infrastructure (AMI) where a Field Area Network (FAN) provides two-way communications with devices and returns data from the edge of the distribution system. Rigorous vetting of alternative cellular options for DR demonstrated 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 Load Control Devices (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 DRMS headend for the analytics needed to interface with organized markets and effectively arbitrage the costs of high market prices.

OATI promotes itself as a “master integrator” and will provide the “single pane of glass” through which our 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.

The Company’s collaboration with the University of Minnesota Morris (UMN Morris) for its flow state battery project is a first in edge system 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 manage the battery which OATI has included in its bid under this DR project.

The potential to reach across multiple vendors to run multiple programs, including the flow state battery project at UMN Morris, 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 future of growth in Demand Response.

The costs of the project are expected to be between \$20.4M and \$27.2M dependent on ongoing development with L+G. The Company will be providing the business case for the DR project in its next EUIC filing, expected to be completed mid-April, where detailed information regarding these developments can be found.

Customers on DR programs produced \$43M in energy sales for the Company in 2022. If not for the Company's DR offerings, customers would either place their loads on firm service rates which would cost about double the \$43M and increase the Company's purchased fuel expense. Or customers would displace these loads with fossil fuel heating systems which are less efficient, using more energy, and produce negative environmental impacts. Other benefits include avoided capacity additions and purchases, avoided energy market and transmission costs, frequency regulation, and system protection under emergency conditions.

The DR program also provides the Company with 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.

**B. *The Department requests OTP discuss in reply comments how it can expand its DER forecasting in its 2025 IDP to inform system-wide distribution planning.***

With the annual number of applications and installed interconnections steadily increasing, Otter Tail is gathering more accurate and applicable data. This provides insights into the regions within our service territory that can expect to see higher levels of penetration more rapidly in comparison to some of Otter Tail's other, more rural regions. This information combined with the improved system visibility following our AMI rollout, will afford us greater insights into Regional DER Forecasting and available hosting capacities within these more probable regions moving forward.

Additionally, state and federal regulatory influences can significantly influence the interconnection(s) of additional DER, subsequently impacting future growth trends. Otter Tail serves customers across a tri-state area (MN, ND, and SD), and differing state regulations and views concerning the increase in renewable energy deployment can significantly impact future DER Forecasts at the state and regional level. As such, Otter Tail will continue to closely monitor and evaluate new regulations and DER-related trends in all our jurisdictions and apply any takeaways in our future forecasts.

**C. *The Department requests OTP include in reply comments a description of how its distribution system planning will evolve with the incorporation of additional impacts from the IRA.***

In addition to the transportation electrification and solar opportunities the IRA provides, the Company is excited about the electrification and energy efficiency opportunities its customers will have once IRA funding is rolled out. In preparation for the release of IRA programs and funding from the Department, the Company has attended several meetings with DOC staff and other Minnesota stakeholders. The Company believes that once the IRA programs are up and running they will pair nicely with the Company's existing ECO customer opportunities. The Department has yet to formally launch these programs at this time. The Company anticipates that in early 2025 it will have a more in-depth understanding of how these programs will complement its ECO offerings.

Recently, in March 2024, the Company met with the DOC and White Earth Nation (WEN) to discuss a home energy auditor program WEN plans to implement at their local community college. Otter Tail is very interested in this program as we expect a large need for additional residential energy auditors in the near future to

unlock IRA funding for customers installing home energy efficiency or electrification projects. The Company has also attended several meeting with the North Dakota Department of Commerce on IRA funding opportunities. Working with regulatory agencies in both states is a must to make sure Otter Tail and our cusotmers are positioned well in advance of the roll-out of IRA opportunities. Saving energy in both states ultimately reduces system costs for all customers.

Once the Company has gained experience working with the IRA opportunities, its new ECO electrification offerings, and other future opportunities, the Company will be able to better forecast the true grid impacts of both its ECO efforts and the other IRA programs led by the DOC.

The Company's current rollout of AMI metering will provide further value in distribution planning. With interval metering data, at each customer location, the Company will be able to measure and evaluate load change impacts from the implementation of IRA and ECO programs on the distribution system. The Company will be well positioned to proactively monitor and manage its infrastructure as new loads are added to the system.

Many IRA and electrification opportunities will encourage customers to switch from fossil-fuel heating systems to electic heat. During winter periods distribution equipment such as transformers can be loaded to higher capacity given winter ambient temperatures meaning added electrification in the winter will have less of an impact on the distribution system in comparison to summer electrification.

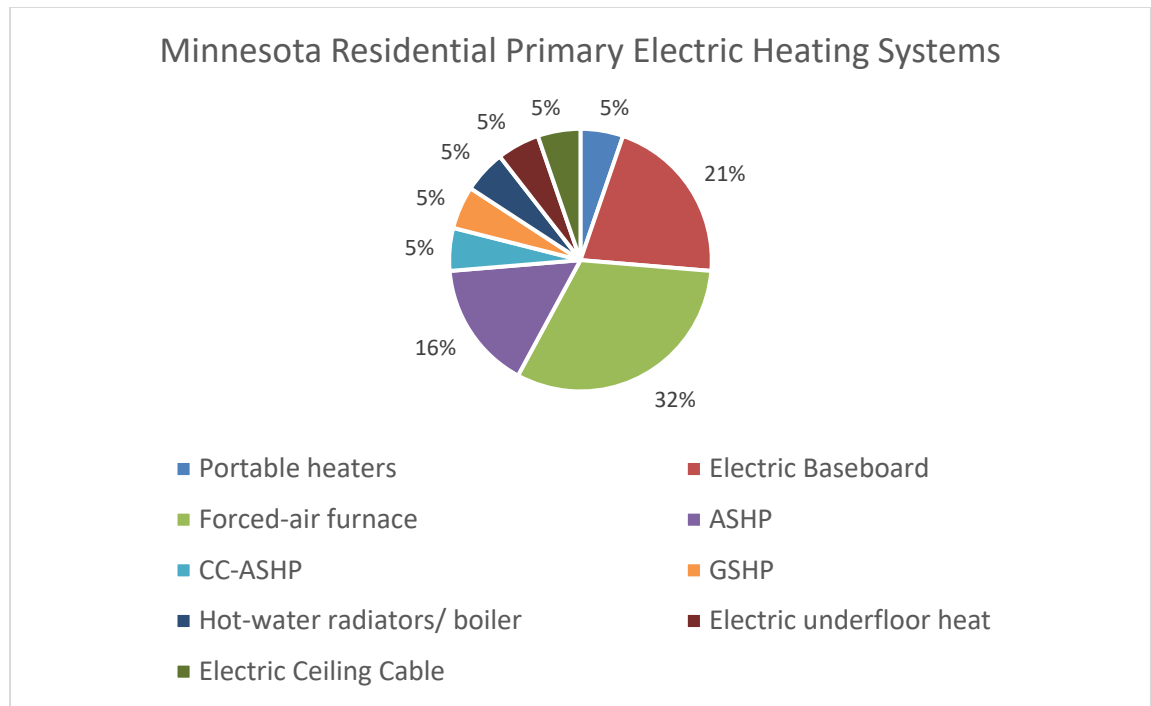
***D. The Department requests that OTP provide data on the fraction of its customers that rely on the primary heating sources of natural gas, electric resistance heat, or all other heat sources.***

In 2018, Otter Tail performed a system-wide residential customer Heating and Cooling Equipment survey. The results of this survey are consistent with the figures the Department included in their March 22, 2024, Reply Comments. Otter Tail found 38 percent primarily heated with natural gas, 31 percent electricity, 26 percent propane, 3 percent fuel oil, and 2 percent wood. Otter Tail plans additional studies in 2024 for both Residential and Commercial customers.

Of the homes heated primarily with electricity, approximately 74 percent are heated with resistance heat, as shown in Chart 1. Resistance heat is 100 percent efficient, but not as efficient as heat pump technologies. However many of Otter Tail's customers with resistance heating technologies have them on a demand response rate. Hot-water boilers and other thermal storage technologies are an

excellent example of this. Often these systems are put on Otter Tail's Fixed Time of Service rate, will only charge for eight hours overnight and supply thermal energy to the home or business for the remaining 16 hours. While these technologies are not as efficient as a heat pump, they provide the grid and customers with substantial savings.

**Chart 1**



**E. *The Department requests feedback from OTP and stakeholders regarding the potential revision of IDP filing requirements to remove the requirement that financial information be presented in IDP-specific budget categories.***

In Otter Tail's first IDP, it provided historical financial data in the following categories. The categories listed in bold are what most closely rerepresent our existing capital budget forecasting software:

- 1. New Load or Reliability**
- 2. Replace**
- 3. Relocate**
- 4. Metering**
5. Grid Modernization or Pilot Projects

Since that time, Otter Tail has provided financial information in the following IDP specific categories:

- a. Age-Related Replacements and Asset Renewal
- b. System Expansion or Upgrades for Capacity
- c. System Expansion or Upgrades for Reliability and Power Quality
- d. New Customer Projects and New Revenue
- e. Grid Modernization and Pilot Projects
- f. Projects related to local (or other) government-requirements
- g. Metering
- h. Other

As can be seen, some of the categories in Otter Tail's capital budgeting software are like for like with the IDP categories. Those that are not do require some manual manipulation to put them in the correct category. This requires a review of each budget and an understanding of the project drivers. That said, if there is value in benchmarking these categories against the other utilities in Minnesota, the categorization effort is manageable. Whatever path is selected, it should be noted that project categorization is not black and white as multiple drivers exist for every project. For example, nearly all distribution spend has a factor of reliability improvement to customers. With that, Otter Tail aims to provide the primary driver when categorizing projects. The categories that have the most overlap are the above-referenced categories (b) and (c), and Otter Tail would support combining those categories given the overlap.

***F. The Department requests feedback from OTP and other parties on how to schedule the IDP filing to better integrate the IDP's inputs and outputs with other Commission proceedings in reply comments.***

Currently there are a handful of proceedings with overlap to the Integrated Distribution Plan (IDP). They are as follows:

- Electric Utility Infrastructure Costs (EUIC)
- Energy Conservation and Optimization (ECO)
- Safety, Reliability, and Service Quality (SRSQ)
- Transportation Electrification Plan (TEP) – now merged into the IDP
- Joint Investigation into the Impacts of the Federal Inflation Reduction Act

Each of these dockets have their own distinct purposes and filing requirements. More important than integrating the filing timing of each of these



dockets is an understand of what is requested and filed in each docket. At this time, Otter Tail is supportive of leaving the filing timing as is but recommends stakeholders and reviewers be aware of these other dockets. Ultimately, a review of the most current utility filing in each of the areas above would be helpful ahead of reviewing the utility IDP. The holistic understanding of each of these dockets hopefully leads to more efficient administration of each of the proceedings.

Otter Tail will continue to cite/reference these other dockets in future IDP filings so stakeholders can easily find the information.

***G. The Department recommends that OTP outline its process for how NWA analysis will be conducted, and present an analysis, as applicable, for the “Purchase of DSA Substation” and “Rush Otter South Feeder Upgrades” projects.***

Otter Tail appreciates the Department flagging both of these projects for further discussion. Below is some information regarding both projects to help understand the applicability and viability of NWAs:

- Purchase of DSA Substation – This is a project located in North Dakota and should not have been included in the MN IDP. This was an oversight in the initial filing.
- Rush Otter South Feeder Upgrades – This is an overhead line to underground line conversion project identified due to the age and condition of these assets. NWA’s are applicable for any capacity driven project as they can defer the need for upgrading distribution components to higher ampacity. Given the OH assets for this project are in need of replacement due to age and condition regardless of an NWA deployment, the project is not a good fit for further analysis.

***H. The Department recommends the Commission direct OTP to include an update of the Morris Flow Battery Project in its 2025 IDP.***

The Company is excited about the UMN Morris Flow Battery partnership project and plans to include an update of the project in its 2025 IDP filing.

***I. The Department recommends the Commission direct OTP to include in its 2025 IDP an update of the Morris, Minnesota impact study and identify the specific investments included in its budget to mitigate risks identified in the study.***

Otter Tail is looking forward to proving an updated study in the 2025 IDP. With Otter Tail's Advanced Metering Infrastructure (AMI) technology in place coupled with the completion of our GIS distribution data collection and connectivity project, engineers will be able to perform in-depth studies on both current and future EV and DER load impact(s) to the Otter Tail electrical distribution system infrastructure. These studies will also help Otter Tail annually budget for projects to mitigate system issues identified within the engineering studies.

***J. The Department recommends the Commission order OTP to file a supplemental filing that proposes a plan to accelerate beneficial electrification for its customers and provide forecasts of expected grid impacts of the same.***

The Company believes it would be premature at this time to file a supplemental filing that proposes a plan, outside of the Company's Energy Conservation and Optimization (ECO) efforts, to accelerate beneficial electrification and provide forecasting of expected grid impacts. The Company's 2024 – 2026 ECO plan, Docket No. E017/CIP-23-94, was approved by the Department in December of 2023 and is still in its first few months of implementation. This plan contains many beneficial electrification items such as promotion of residential and commercial heat pumps, electric vehicles, battery operated lawn and garden equipment, commercial electric forklifts, electric school buses, and other custom commercial electrification projects.

The Company shares the enthusiasm expressed by the Department's comments regarding the need for electrification, specifically heat pump adoption by our customers. The Company's previous, current, and future activities illustrate Otter Tail's commitment to energy efficiency through electrification. These activities are summarized below:

1. To accelerate the adoption of heat pumps, the Company led the request to end the fuel switching prohibition in the Company's 2020 CIP extension plan. The Company was also highly involved in the passage of the 2021 ECO Act which ultimately allowed efficient fuel switching (heat pump proliferation).

2. Through ECO, the Company offers among the highest rebates for heat pumps, \$/ton installed, in the nation.
3. Otter Tail's Minnesota heat pump installations results have historically exceed filed goals. We have been the leader in conservation and heat pump adoption over the last decade. For example, in 2023, our residential goal was 85 units and our customers installed 342 heat pumps, 302 percent of goal. For 2023, we had a commercial goal of 190 and installed 250, 132 percent of goal.
4. We are one of two electric utilities to offer electrification and load management measures within our new 2024-2026 ECO plan.
5. We have been a member of and participated in the Center for Energy and Environment's Air Source Heat Pump Collaboration since its inception.
6. We have one of the premier international geothermal design engineering service consultants under contract. Continually this consultant has properly designed commercial projects that were once non-cost-effective and brought them to realization through proper design engineering which significantly reduces costs.
7. In February 2024, we hosted two contractor workshop events for regional electrical, plumbing, and HVAC contractors. These one and a half day events featured interactive workshops focused on Otter Tail's new ECO offerings, customer rebates, current heat pump technologies, and upcoming IRA opportunities.
8. In 2024, we launched our online Find a Contractor tool on our Ways To Save website. This tool helps customers connect to contractors, focusing on heat pumps installers and features contractors within 50 miles of the customer's zip code that have installed a heat pump for a qualifying rebate within the last 18 months. Contractors can also list any of their certifications on their profile.
9. We are a pioneering utility to offer rebates for Air-to-Water heat pumps. This technology is promising for future load management applications since the hydronic system can store thermal energy in a heat sync and utilize the heat during a load management event. This will also avoid the customer from having a fossil-fuel back-up system, helping the environment and saving customer money.
10. We offer both rebates and low interest financing for commercial customer heat pump installations.
11. We are currently in the process of hiring two energy auditors to support our ECO plan and upcoming IRA opportunities. We have also met with

the DOC and White Earth Nation on additional energy auditor training offerings.

Otter Tail is cognizant of potential load growth from electrification and is focused on recruiting customer loads to its demand response (DR) rate programs. Otter Tail has a long history of substantial customer participation in its DR rate offerings and recently included its DR programs in its 2024-2026 ECO plan. The Company will continue to leverage these programs to save customers money on their bills and reduce peak demand, supporting electrical infrastructure.

The Company believes its 2025 IDP will highlight many of the successes the IRA funding has delivered to its customers.

***K. The Department recommends the Commission direct OTP to develop a suite of metrics to track resiliency, including SAIDI and SAIFI, MEDs, and other metrics to the extent warranted.***

Otter Tail submitted our 2023 Safety Reliability Service Quality, SRSQ, report on April 1, 2024. As required, the filing includes SAIDI, SAIFI, CAIDI, MAIFI, CEMIn and CELIDn, both normalized and non-normalized. A discussion on our systems MED(s) and the calculation process method was also included.

Otter Tail representatives attended two moderated panels discussing resilience during DistribuTECH 2023, conducted by electrical industry leaders from around North America. There was much discussion regarding how utilities will measure resilience performance of their systems into the future. The conclusion was there are no industry standards for resilience measurement today.

The Outage Data Initiative Nationwide, ODIN, seeks to establish comprehensive reporting standards for power outage data to enable utilities to exchange/compare data with stakeholders at all levels. ODIN will need to establish resiliency reporting standards nationwide to measure resiliency effectiveness of GRIP funded projects. Otter Tail will monitor future metrics recommended by ODIN.

At this time, Otter Tail would select the following preliminary metrics to track future resilience performance as already reported through the MN SRSQ:

- SAIFI
- CAIDI
- MED trends

- L. *The Department recommends the Commission revise the IDP filing requirements to identify the sub-sections establishing the requirements for Non-Wires (Non-Traditional) Alternatives Analysis and the TEP as sections 3.E and 3.F, respectively.***

The Company agrees with the Department that TEP section 3.E should be listed in the filing requirements as 3.F and the Non-Wires (Non-Traditional) Alternative Analysis should be changed from 3.F to 3.E, since it is listed first in the requirements.

### **III. CONCLUSION**

The Company has many existing and upcoming impactful plans and opportunities for our customers as shared throughout the IDP. We look forward to working with the Commission and staff through the approval process of Otter Tail's 2023 IDP.

Dated: April 5, 2024

Respectfully submitted,

#### **OTTER TAIL POWER COMPANY**

By: /s/ MICHAEL RIEWER

Michael Riewer

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**CERTIFICATE OF SERVICE**

**RE: In the Matter of the Distribution System Planning for Otter Tail  
Power Company  
Docket No. E017/M-23-380**

I, Stacy Wahlund, 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  
Reply Comments**

Dated this **5th** day of **April, 2024**.

/s/ STACY WAHLUND  
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John S.	Jaffray	jjaffray@jjrpower.com	JJR Power	350 Highway 7 Suite 236 Excelsior, MN 55331	Electronic Service	No	OFF_SL_23-380_M-23-380

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Nate	Jones	njones@hcpd.com	Heartland Consumers Power	PO Box 248  Madison, SD 57042	Electronic Service	No	OFF_SL_23-380_M-23-380
Michael	Kampmeyer	mkampmeyer@a-e-group.com	AEG Group, LLC	260 Salem Church Road  Sunfish Lake, MN 55118	Electronic Service	No	OFF_SL_23-380_M-23-380
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_23-380_M-23-380
Brad	Klein	bklein@elpc.org	Environmental Law & Policy Center	35 E. Wacker Drive, Suite 1600 Suite 1600 Chicago, IL 60601	Electronic Service	No	OFF_SL_23-380_M-23-380
Brian	Krambeer	bkrambeer@mienergy.coop	MiEnergy Cooperative	PO Box 626 31110 Cooperative Way Rushford, MN 55971	Electronic Service	No	OFF_SL_23-380_M-23-380
Michael	Krause	michaelkrause61@yahoo.com	Kandiyo Consulting, LLC	433 S 7th Street Suite 2025 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_23-380_M-23-380
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mat	Krisetya	krisetya@fresh-energy.org	Fresh Energy	408 St Peter Street  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-380_M-23-380
Matthew	Lacey	Mlacey@grenergy.com	Great River Energy	12300 Elm Creek Boulevard  Maple Grove, MN 553694718	Electronic Service	No	OFF_SL_23-380_M-23-380
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Dean	Leischow	dean@sunrisenrg.com	Sunrise Energy Ventures	315 Manitoba Ave Ste 200  Wayzata, MN 55391	Electronic Service	No	OFF_SL_23-380_M-23-380
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360  St. Paul, MN 55101	Electronic Service	No	OFF_SL_23-380_M-23-380
Susan	Ludwig	sludwig@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_23-380_M-23-380
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_23-380_M-23-380
Gregg	Mast	gmast@cleanenergyeconomyymn.org	Clean Energy Economy Minnesota	4808 10th Avenue S  Minneapolis, MN 55417	Electronic Service	No	OFF_SL_23-380_M-23-380
Thomas	Melone	Thomas.Melone@AllcoUS.com	Minnesota Go Solar LLC	222 South 9th Street Suite 1600 Minneapolis, MN 55120	Electronic Service	No	OFF_SL_23-380_M-23-380

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Dalene	Monsebroten	dalene.monsebroten@nmp agency.com	Northern Municipal Power Agency	123 2nd St W  Thief River Falls, MN 56701	Electronic Service	No	OFF_SL_23-380_M-23-380
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Ben	Nelson	benn@cmpasgroup.org	CMMPA	459 South Grove Street  Blue Earth, MN 56013	Electronic Service	No	OFF_SL_23-380_M-23-380
Anthony	Nelson	amnelson@otpc.com	Ottertail Power	53233 Sunrise Ln  Park Rapids, MN 56470	Electronic Service	No	OFF_SL_23-380_M-23-380
Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment	212 3rd Ave N Ste 560  Minneapolis, MN 55401	Electronic Service	No	OFF_SL_23-380_M-23-380
David	Niles	david.niles@avantenergy.c om	Minnesota Municipal Power Agency	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Sephra	Ninow	sephra.ninow@energycent er.org	Center for Sustainable Energy	426 17th Street, Suite 700  Oakland, CA 94612	Electronic Service	No	OFF_SL_23-380_M-23-380
Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute	2801 21ST AVE S STE 220  Minneapolis, MN 55407-1229	Electronic Service	No	OFF_SL_23-380_M-23-380

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company	200 1st Street SE PO Box 351  Cedar Rapids, IA 524060351	Electronic Service	No	OFF_SL_23-380_M-23-380
David	O'Brien	david.obrien@navigant.com	Navigant Consulting	77 South Bedford St Ste 400  Burlington, MA 01803	Electronic Service	No	OFF_SL_23-380_M-23-380
Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello	505 Walnut Street Suite 1 Monticello, MN 55362	Electronic Service	No	OFF_SL_23-380_M-23-380
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-380_M-23-380
Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District	PO Box 248  Madison, SD 570420248	Electronic Service	No	OFF_SL_23-380_M-23-380
Dan	Patry	dpatry@sunedison.com	SunEdison	600 Clipper Drive  Belmont, CA 94002	Electronic Service	No	OFF_SL_23-380_M-23-380
Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_23-380_M-23-380
Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power	30 West Superior Street  Duluth, MN 55802	Electronic Service	No	OFF_SL_23-380_M-23-380
Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute	1000 Vermont Ave, Third Floor  Washington, DC 20005	Electronic Service	No	OFF_SL_23-380_M-23-380

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_23-380_M-23-380
Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company	215 S. Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-380_M-23-380
Michael	Reinertson	michael.reinertson@avantenergy.com	Avant Energy	220 S. Sixth St. Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
John C.	Reinhardt	N/A	Laura A. Reinhardt	3552 26th Ave S  Minneapolis, MN 55406	Paper Service	No	OFF_SL_23-380_M-23-380
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	Yes	OFF_SL_23-380_M-23-380
Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy	26 E Exchange St, Ste 206  St. Paul, MN 551011667	Electronic Service	No	OFF_SL_23-380_M-23-380
Michael	Riewer	MRiewer@otpc.com	Otter Tail Power Company	PO Box 4496  Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_23-380_M-23-380
Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association	1155 15th St NW, Ste 500  Washington, DC 20005	Electronic Service	No	OFF_SL_23-380_M-23-380
Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative	P.O. Box 227  Madison, SD 57042	Electronic Service	No	OFF_SL_23-380_M-23-380
Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power	5301 32nd Ave S  Grand Forks, ND 58201	Electronic Service	No	OFF_SL_23-380_M-23-380



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Dean	Sedgwick	Sedgwick@Itascapower.com	Itasca Power Company	PO Box 455  Spring Lake, MN 56680	Electronic Service	No	OFF_SL_23-380_M-23-380
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Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_23-380_M-23-380
Patricia F	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.	180 N LaSalle St Ste 3700 Chicago, IL 60601	Electronic Service	No	OFF_SL_23-380_M-23-380
Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy	2928 5th Ave S  Minneapolis, MN 55408	Electronic Service	No	OFF_SL_23-380_M-23-380
Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.	254 E Hacienda Ave  Campbell, CA 95008	Electronic Service	No	OFF_SL_23-380_M-23-380
Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy	305 Saint Peter St  Saint Paul, MN 55102	Electronic Service	No	OFF_SL_23-380_M-23-380
Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.	76 W Kellogg Blvd  St. Paul, MN 55102	Electronic Service	No	OFF_SL_23-380_M-23-380
Joshua	Smith	joshua.smith@sierraclub.org		85 Second St FL 2  San Francisco, CA 94105	Electronic Service	No	OFF_SL_23-380_M-23-380
Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.	220 South Sixth Street Suite 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380

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Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger	396 Hayes Street  San Francisco, CA 94102	Electronic Service	No	OFF_SL_23-380_M-23-380
Byron E.	Starns	byron.starns@stinson.com	STINSON LLP	50 S 6th St Ste 2600  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-380_M-23-380
James M	Strommen	jstrommen@kennedy-graven.com	Kennedy & Graven, Chartered	150 S 5th St Ste 700  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380
Eric	Swanson	eswanson@winthrop.com	Winthrop & Weinstine	225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629	Electronic Service	No	OFF_SL_23-380_M-23-380
Dean	Taylor	dtaylor@pluginamerica.org	Plug In America	6380 Wilshire Blvd, Suite 1000  Los Angeles, CA 90048	Electronic Service	No	OFF_SL_23-380_M-23-380
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-380_M-23-380
Jason	Topp	jason.topp@lumen.com	CenturyLink Communications, LLC	200 S 5th St Ste 2200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_23-380_M-23-380

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Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company	215 S. Cascade St  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_23-380_M-23-380
Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities	208 S Walnut Ave PO BOX 800 Owatonna, MN 55060	Electronic Service	No	OFF_SL_23-380_M-23-380
Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power	30 W Superior St  Duluth, MN 55802-2093	Electronic Service	No	OFF_SL_23-380_M-23-380
Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company	200 First St SE  Cedar Rapids, IA 52401	Electronic Service	No	OFF_SL_23-380_M-23-380
Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC	W234 N2000 Ridgeview Pkw Court  Waukesha, WI 53188-1022	Electronic Service	No	OFF_SL_23-380_M-23-380
Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW	2909 Anthony Ln  St Anthony Village, MN 55418-3238	Electronic Service	No	OFF_SL_23-380_M-23-380