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July 3, 2018

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

Re: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Rate Update to its Environmental Upgrades Cost Recovery Rider Rate, Rate Schedule 13.08 Docket No. E017/M-18- Initial Filing

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of its annual update to the Environmental Upgrades Cost Recovery Rider Rate under Otter Tail's Rate Schedule 13.08.

Otter Tail has electronically filed this document with the Commission. In compliance with Minn. Rule 7829.1300, Subp. 2, Otter Tail is serving a copy of this filing on the Minnesota Department of Commerce- Division of Energy Resources and the Minnesota Office of Attorney General-Antitrust and Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's general service list. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8385 or at bhaugen@otpc.com.

Sincerely,

/S/ BRYCE C. HAUGEN
Bryce C. Haugen, Senior Rates Analyst
Regulatory Administration

jch
Enclosures
By electronic filing
c: Service List

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

**In the Matter of Otter Tail Power Company's
Petition for Approval of the Annual Rate Update
to its Environmental Upgrades Cost Recovery
Rider, Rate Schedule 13.08**

Docket No. E017/M-18-

SUMMARY OF FILING

Otter Tail Power Company (Otter Tail) files this Petition with the Minnesota Public Utilities Commission for approval of its annual update to its Environmental Upgrades Cost Recovery Rider rate under Otter Tail's Rate Schedule 13.08.

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

**In the Matter of Otter Tail Power Company's
Petition for Approval of the Annual Rate Update
to its Environmental Upgrades Cost Recovery
Rider, Rate Schedule 13.08**

Docket No. E017/M-18-

**PETITION OF OTTER TAIL
POWER COMPANY**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of its annual update (Update) to the Environmental Upgrades Cost Recovery Rider (ECRR) rate under Otter Tail's Rate Schedule 13.08.

On December 18, 2013, the Commission approved Otter Tail's ECRR rate schedule and the initial ECRR rate in Docket No. E017/M-13-648. The ECRR allowed Otter Tail to recover its share of eligible costs for the Big Stone Plant's Air Quality Control System (AQCS). In Otter Tail's last general rate case, Docket No. E017/GR-15-1033, filed on February 16, 2016, Otter Tail proposed to move the AQCS project investments in to base rates. On October 30, 2017, the Commission approved Otter Tail's ECRR rate schedule and the ECRR rate in the Findings of Fact, Conclusions and Order (Order) for Docket Nos. E017/GR-15-1033 and E017/M-16-373. In that Order, the Commission approved Otter Tail's request to roll the AQCS project into base rates and return the remaining over-collection in the rider to customers through an ECRR credit over the next twelve months. Otter Tail files this update, which includes actual amounts passed back to customers through May 2018 and an updated forecast through November 2018 when Otter Tail expects the tracker balance to be at or near zero.

For this annual update, Otter Tail requests the ECRR rate change from (0.935) percent of a customer's bill to Zero percent effective December 1, 2018. Otter Tail proposes that any over or under collected balance remaining at that point be deferred until the Company's next rate case. Otter Tail's recommended treatment of the balance is consistent with the approach approved by the

Commission in Docket No. E017/M-12-708¹ for Otter Tail's Renewable Resource Cost Recovery Rider when all rider projects rolled into base rates in Otter Tail's general rate case in Docket No. E017/GR-10-239. Otter Tail proposes a compliance filing for the end of the recovery period to address any residual over or under-recovery reflected in the tracker balance at the end of the recovery period.

II. SUMMARY OF FILING

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

III. 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
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney
(Minn. Rules 7829.1300, Subp. 3(B))

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8956

¹ Commission's April 17, 2013 ORDER APPROVING REQUEST TO REDUCE RIDER RECOVERY FACTOR, APPROVING REFUND, AND SETTING REQUIREMENTS FOR FUTURE RIDER FILINGS in Docket No. E017/M-12-708.

C. Date of filing and proposed effective date of rates
(Minn. Rules 7829.1300, Subp. 3(C))

The date of the filing is July 3, 2018. Otter Tail proposes the ECRR rate of zero percent become effective December 1, 2018.

D. Statutes controlling schedule for processing the filing
(Minn. Rules 7829.1300, Subp. 3(D))

Minn. Stat. § 216B.16 permits a utility to implement a proposed rate change after giving the Commission a 60-day notice. 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))

Bryce C. Haugen
Senior Rates Analyst, Regulatory Administration
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8385

F. Impact on rates
(Minn. Rules 7829.1300, Subp 4(F))

The ECRR has no effect on Otter Tail’s base rates. The additional information required under this Rule is included throughout the 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:

Bryce C. Haugen
 Senior Rates Analyst
 Regulatory Administration
 Otter Tail Power Company
 215 South Cascade Street
 Fergus Falls, MN 56538-0496
 (218) 739-8385
 bhaugen@otpc.com

Cary Stephenson
 Associate General Counsel
 Otter Tail Power Company
 215 South Cascade Street
 Fergus Falls, MN 56538-0496
 (218) 739-8956
 cstephenson@otpc.com

H. Service on other parties
 (Minn. Rules 7829.1300, Subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, Subp. 2, Otter Tail served a copy of this Petition on the Office of Energy Security of the Department of Commerce and the Antitrust & Utilities Division of the Office of the Attorney General. 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.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Background and Proposed Plan

On July 31, 2013, Otter Tail filed an ECRR tariff and proposed rates in Docket No. E017/M-13-648 to recover the jurisdictional allocated costs incurred in complying with federal environmental mandates at the Big Stone generating station. Table 1 below identifies Otter Tail's past ECRR filings.

TABLE 1

<u>ECRR History</u>	<u>Docket Number</u>	<u>Commission Approved</u>	<u>Rate Effective Date</u>
Original ECRR Rate and Mechanism	E017/M-13-648	December 18, 2013	January 1, 2014
First Update	E017/M-14-647	November 26, 2014	December 1, 2014
Second Update	E017/M-15-719	March 9, 2016*	No change
Third Update	E017/M-15-1033 and E017-M-16-373	October 30, 2017	November 1, 2017**

*Rate effective December 1, 2014 unchanged.

**Rate approved to pass back over-collection in tracker. No projects remain in rider.

In this fourth annual update, Otter Tail requests to update its ECRR rate to zero percent as no projects remain in the ECRR and the Rider balance will be at or near zero at the end of the collection period.

B. Proposal for Tracker Balance

As shown in Attachment 1, Line No. 7, Otter Tail projects the ECRR tracker balance at the end of November 2018 to be \$38,901. The tracker account information compares Otter Tail's Minnesota jurisdictional costs and the amount recovered through Minnesota retail revenue. The tracker balance (either positive or negative) accrues monthly carrying charges at a rate of 1/12 of Otter Tail's cost of capital times the tracker balance.² Otter Tail provides two alternatives to address this balance.

Option A

Otter Tail proposes to address this balance in the Company's next rate case. This approach is consistent with prior Commission treatment for similar balances as described earlier in this Petition. Attempting to more precisely match rider recovery through an update to the ECRR rate to the approved amount could impose an administrative burden that exceeds any possible benefit to ratepayers. For these reasons Otter Tail recommends utilizing deferred accounting and addressing the balance in its next general rate case.

Option B

Rather than address this balance in the Company's next rate case, the Commission may prefer to include the \$38,901 balance in another rider such as the Fuel Clause Adjustment rider. Otter Tail would support handling the balance in this manner if the Commission desires.

Otter Tail recommends Option A and proposes to submit a compliance filing after the final tracker balance is determined to provide the balance to the Commission.

² The Order in Docket No. E017/M-13-648 approved Otter Tail's proposed tracker recovery method, "including a monthly 1/12 rate of return charged on any under or over recovery balance."

C. Customer notification and billing

Otter Tail will provide notice to customers regarding the ECRR update. The following is the proposed language to be included as a notice with customers’ bills during December 2018 when the ECRR rate update is implemented:

“Starting this month, the Resource Adjustment no longer includes the Environmental Cost Recovery Rider (ECRR) costs. The ECRR recovers costs associated with new environmental technologies at our Big Stone Plant that help to meet government requirements. The remaining costs are now included in base rates. For more information contact Customer Service at 800-257-4044 or place an inquiry at otpc.com.”

V. ENVIRONMENTAL COST RECOVERY RIDER RATE SCHEDULE

Otter Tail’s updated rate schedule Section 13.08 is provided in Attachment 2 to this Petition in both redline and clean versions. In addition to the rate update, Otter Tail includes the addition of the “Mandatory and Voluntary Riders” section which is added to provide specific language for the addition of riders to bills and a reference to the matrices to determine the applicability to our rates. This provides consistency with Otter Tail’s other rate schedules.

VI. CONCLUSION

Otter Tail respectfully requests the Commission approve this 2018 Update to its ECRR to be effective December 1, 2018, as explained in this Petition.

Dated: July 3, 2018

Respectfully submitted:

OTTER TAIL POWER COMPANY

By: /s/ BRYCE C. HAUGEN

Bryce C. Haugen
Senior Rates Analyst, Regulatory Administration
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8385

OTTER TAIL POWER COMPANY
ENVIRONMENTAL COST RECOVERY RIDER FILING ATTACHMENTS

- Attachment 1 Environmental Cost Recovery Rider Tracker Report
- Attachment 2 Environmental Cost Recovery Rider, Electric Rate Schedule 13.08

Otter Tail Power Company
Environmental Cost Recovery Rider Tracker
Docket No. E017/M-18-_____

Line No.	TRACKER SUMMARY Requirements Compared to Billed:	2017			2018										
		November Actual	December Actual	YE Projected	January Actual	February Actual	March Actual	April Actual	May Actual	June Projected	July Projected	August Projected	September Projected	October Projected	November Projected
1	Revenue Requirements			8,831,795											
2	Air Quality Control System														
3	Billed (forecast kWh x adj factor)	110,460	(162,796)	9,676,252	(188,601)	(182,738)	(165,850)	(156,559)	(146,513)	(145,861)	(156,098)	(159,920)	(155,350)	(149,320)	(158,409)
4															
5	Difference	(110,460)	162,796	(844,457)	188,601	182,738	165,850	156,559	146,513	145,861	156,098	159,920	155,350	149,320	158,409
6	Carrying Charge	(12,090)	(12,970)		(11,895)	(10,627)	(9,392)	(8,269)	(7,205)	(6,205)	(5,203)	(4,120)	(3,002)	(1,909)	(851)
7	Cumulative Difference	(1,807,465)	(1,657,639)		(1,480,933)	(1,308,822)	(1,152,363)	(1,004,073)	(864,765)	(725,109)	(574,214)	(418,415)	(266,067)	(118,657)	38,901
8															
9	Carrying Charge Calculation	(12,970)	(11,895)		(10,627)	(9,392)	(8,269)	(7,205)	(6,205)	(5,203)	(4,120)	(3,002)	(1,909)	(851)	279
10	Cumulative Carrying Charge	(124,850)	(136,745)		(22,521)	(31,913)	(40,182)	(47,386)	(53,592)	(58,795)	(62,915)	(65,917)	(67,827)	(68,678)	(68,399)
11	Carrying cost	8.61%	8.61%		8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%	8.61%
12															
13															
14	Forecasted Sales (MWh)									197,933	211,824	217,010	210,809	202,626	214,961

Approved on Oct 30, 2017 in Docket E017/GR-15-1033

SUMMARY	Nov 2017 -
	Oct 2018
Revenue Requirements	\$0
Carrying Charge	(85,376)
True Up	(1,857,668)
Total Revenue Requirements	(\$1,943,044)
Projected sales in mWh	2,636,702
Average Rate	(\$0.00074)

Attachment 2

**Tariff Sheet 13.08
Environmental Cost Recovery Rider**



Fergus Falls, Minnesota

ENVIRONMENTAL COST RECOVERY RIDER

Table with 2 columns: DESCRIPTION, RATE CODE. Row 1: Environmental Cost Recovery Rider, 32-570

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 retail rate schedules in Sections 9, 10, 11, 12 and 14, except for Section 14.09 (TailWinds) and Section 14.11 (Released Energy).

COST RECOVERY FACTOR: There shall be included on each Minnesota Customer's monthly bill an Environmental Cost Recovery ("ECR") charge based on the applicable cost recovery factor multiplied by the Customer's monthly bill. The Customer's monthly bill shall be based on all applicable charges and credits under the Company's retail rate schedules in Sections 9, 10, 11, 12 and 14, except for Section 14.09 (TailWinds) and Section 14.11 (Released Energy). The Environmental Cost Recovery Charge will not apply to any Mandatory Riders or sales tax and any local assessments as provided in the General Rules and Regulations for the Company's electric service. The Environmental Cost Recovery charge will be included in the Resource Adjustment line item on the Customer's bill.

The Environmental Cost Recovery Factor is (0.935)0 percent.

DETERMINATION OF ECR ADJUSTMENT FACTOR: An ECR Adjustment Factor shall be determined by dividing the forecasted balance of the ECR Tracker account by the forecasted retail revenue for the upcoming year (or such other period as may be approved by the Minnesota Public Utilities Commission ("Commission")). The ECR Adjustment Factor shall be rounded to the nearest 0.001%. The ECR Adjustment Factor may be adjusted annually (or other approved periods) with approval of the Commission.

Recoverable Environmental Measures Costs shall be the annual revenue requirements associated with environmental measures eligible for recovery under MN Statute 216B.1692 that are determined by the Commission to be eligible for recovery under this ECR Rider. A standard model will be used to calculate the total forecasted revenue requirements for eligible measures for the designated period. All costs appropriately charged to the ECR Tracker account shall be eligible for recovery through this Rider, and all revenues recovered from the ECR Adjustment shall be credited to the ECR Tracker account.



Fergus Falls, Minnesota

Minnesota Public Utilities Commission
Section 13.08
ELECTRIC RATE SCHEDULE
Environmental Cost Recovery Rider

Page 2 of 2
~~First~~ Second Revision

Forecasted retail revenue shall be the estimated total retail electric revenue for the designated recovery period.

TRUE-UP: For each recovery period, a true-up adjustment to the ECR Tracker account will be calculated reflecting the difference between actual prior period ECR Adjustment recoveries and the actual prior period revenue requirements. Any resulting over/under recovery will be reflected as a carryover balance and included in calculating the ECR Adjustment Factor.

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.



Fergus Falls, Minnesota

ENVIRONMENTAL COST RECOVERY RIDER

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The Environmental Cost Recovery Factor is 0 percent.

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DETERMINATION OF ECR ADJUSTMENT FACTOR: An ECR Adjustment Factor shall be determined by dividing the forecasted balance of the ECR Tracker account by the forecasted retail revenue for the upcoming year (or such other period as may be approved by the Minnesota Public Utilities Commission ("Commission")). The ECR Adjustment Factor shall be rounded to the nearest 0.001%. The ECR Adjustment Factor may be adjusted annually (or other approved periods) with approval of the Commission.

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Fergus Falls, Minnesota

Minnesota Public Utilities Commission
Section 13.08
ELECTRIC RATE SCHEDULE
Environmental Cost Recovery Rider

Page 2 of 2
Second Revision

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N
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CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Rate Update to its Environmental Upgrades Cost Recovery Rider Rate, Rate Schedule 13.08
Docket No. E017/M-18-**

I, Jana Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf 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 **July, 2018**

/s/ JANA HRDLICKA

Jana Hrdlicka
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8879

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
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_2018 ECR Tariff Filing
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
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_2018 ECR Tariff Filing
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Bryce	Haugen	bhaugen@otpc.com	Otter Tail Power Company	215 S Cascade St P.O. Box 496 Fergus Falls, MN 56538	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_2018 ECR Tariff Filing
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
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_2018 ECR Tariff Filing
Tammy	Mortenson	tmortenson@otpc.com	Otter Tail Power Company	N/A	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
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	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing
Stuart	Tommerdahl	stommerdahl@otpc.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_2018 ECR Tariff Filing
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	No	GEN_SL_Otter Tail Power Company_2018 ECR Tariff Filing