

April 15, 2024

PUBLIC DOCUMENT

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

RE: **PUBLIC Comments of the Minnesota Department of Commerce**
Docket No. E017/AA-22-214

Dear Mr. Seuffert:

Attached are the **PUBLIC** Comments of the Minnesota Department of Commerce (Department) in the following matter:

Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider 2023 True-Up, Rate Schedule 13.01.

The Petition was filed on March 1, 2024 by Otter Tail Power Company.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve** Otter Tail Power Company's Petition. The Department is available to answer any questions the Commission may have in this matter.

Sincerely,

/s/ SYDNIE LIEB
Assistant Commissioner of Regulatory Analysis

SL/AU/ad
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/AA-22-214

I. INTRODUCTION

On March 1, 2024, Otter Tail Power Company (Otter Tail or the Company) filed its 2023 true-up rate for the Company's Energy Adjustment Rider (EAR) (Petition) with the Minnesota Public Utilities Commission (Commission). The Company submitted its Petition pursuant to the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802 and the applicable reporting requirements provided for in the rules that govern the automatic adjustment of charges, Minnesota Rules 7825.2800 to 7825.2840. Otter Tail requests the Commission approve the 2023 true-up for the Company's EAR and find the Company's filing complies with the applicable reporting requirements.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce, Division of Energy Resources (Department) reviewed Otter Tail's Petition to determine (1) whether the Company's actual 2023 energy costs were reasonable and prudent, (2) whether the Company correctly calculated the 2023 true-up for its Energy Adjustment rates, and (3) whether the Petition complies with the reporting requirements set forth in the applicable Minnesota Rules and Commission Orders. Otter Tail's EAR and Fuel Clause Adjustment (FCA) refer to essentially the same cost recovery mechanism and are used interchangeably throughout the instant comments.

A. SUMMARY OF RECENT FUEL CLAUSE ADJUSTMENT REFORM

Minnesota Statutes § 216B.16, subd. 7 authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their FCA rates monthly to reflect, on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case, and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation (Docket No. E999/CI-03-802) to explore possible changes to the FCA and invited stakeholders to comment on the purpose, structure, rationale, and relevance of the FCA. The Commission's December 19, 2017 *Order* in Docket No. E999/CI-03-802 approved certain reforms to the FCA mechanism. Specifically, Order Point 1 of the December 19, 2017 *Order* approved the Department's FCA reform proposals as follows:

- a. The Commission will set recovery of the utility's fuel, power purchase agreements, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.

- b. Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- c. The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- d. Utilities will be allowed to track any changes in \$/MWh fuel costs that occur over the year and there will be no carrying charge on the tracker.
- e. Annually, each electric utility will report actual \$/MWh fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year.
- f. Each electric utility will refund any over-collections and show prudence of costs before allowing recovery of under-collections. If annual revenues collected (\$/MWh) are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs, the utility must show why it is reasonable to charge the higher costs (under-collections) to ratepayers through a true-up mechanism.

The Commission's December 12, 2018 *Order* in Docket No. E999/CI-03-802 modified the FCA reform previously approved in the Commission's December 19, 2017 *Order* in the same docket. In particular, the December 12, 2018 *Order*:

- Established a January 1, 2020 implementation date for the FCA reform.
- Required the utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year following the relevant calendar year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.
- Granted the relevant utilities a variance to Minnesota Rules 7825.2600, subp. 3, which requires that the FCA be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base fuel rates annually.

The Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802 provided additional details to finalize the FCA reform. Specifically, the June 12, 2019 *Order* approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these rules.

- A procedural schedule, as shown in Appendix A of the *Order*.
- A threshold of plus or minus 5 percent of all FCA costs and revenues to determine whether an event qualifies as a significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.
- Tracking under- or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.
- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019 joint comments¹ in Docket No. E999/CI-03-802 and the requirement that the annual true-up filings include a complete analysis and discussion of the consequences of self-commitment and self-scheduling of generators, including the annual difference between production costs and corresponding prevailing market prices.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019 joint comments² in Docket No. E999/CI-03-802.
- Discontinuation of Otter Tail's reporting of Part D, Section 5 (MISO Day 1); Part E, Section 10, Attachment G (UCAP); Part H, Section 6, Attachments N and O (generation deliverability and IRP-related); and Part H, Section 8 (transformers).

The June 12, 2019 *Order* also permitted utilities to provide wind curtailment reporting as part of their annual true-up filings and required Otter Tail Power to submit, no later than January 31, 2020, a single true-up filing covering the period of July 1, 2018 through December 31, 2019. The Commission directed the Company to apply the per kWh charge/credit resulting from the under-/over-recovery of this 18-month true-up to the applicable monthly rates for the period of March 1, 2020 through February 28, 2021. If any balance from this 18-month true-up remained on February 28, 2021, Otter Tail would be required to include that remaining balance in its subsequent annual true-up under the FCA reform.

On May 1, 2020, in Docket No. E017/AA-20-462, Otter Tail filed its initial petition requesting approval of its annual forecast for its EAR. The Company's Rate Schedule Section 13.01 provides for the EAR. In its May 1, 2020 filing, the Company forecasted 5,070,631 MWhs in sales and \$106,475,294 in total system fuel/purchased power costs, for an average fuel/purchased power cost per MWh of \$20.998.³

¹ In the March 1, 2019 joint comments, Attachment 2 corresponds to Otter Tail Power.

² In the March 1, 2019 joint comments, Attachment 5 corresponds to Otter Tail Power and reflects the Company's current EAR Rate Schedule, Section 13.01, as approved by the Commission's June 12, 2019 *Order* in Docket No. E-999/CI-03-802 (Attachment 4 to the instant Petition is the approved nineteenth revision of the Company's EAR tariff).

³ See Table 2 of Otter Tail's initial May 1, 2020 filing in Docket No. E017/AA-20-462.

Subsequently, in reply comments filed August 14, 2020 in the same docket, Otter Tail revised its forecasted 2021 system fuel/purchased power costs to \$102,058,949, an estimate which reduced the average fuel/purchased power cost per MW to \$20.891.⁴ The Commission approved Otter Tail's 2021 forecast, as revised in the Company's August 14, 2020 reply comments, in its December 31, 2020 *Order* in Docket No. E017/AA-20-462.

Pursuant to the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802, on January 30, 2020, Otter Tail filed a compliance report in Docket No. E017/M-03-30 with the required July 1, 2018 through December 31, 2019 FCA true-up. This true-up showed a refund due to customers of \$1,410,325, which corresponded to a credit of \$0.0005 per kWh. Otter Tail applied the credit to the monthly rates charged for sales subject to EAR/FCA during the period of March 1, 2020 through February 28, 2021. In its May 22, 2020 *Order* in Docket No. E017/M-03-30, the Commission approved the Company's compliance report and annual true-up credit of \$0.0005 per kWh.

On May 14, 2020, in Docket No. E017/AA-19-297, Otter Tail submitted a filing requesting approval to reduce its fuel cost charges to customers for the period of July through September 2020. The Company requested the reduction to account for its over-collection of \$3,676,903⁵ through the EAR/FCA between January and March 2020. In its July 13, 2020 *Order* in the same docket, the Commission approved the \$3,676,903 refund, thereby reducing Otter Tail's July through September 2020 EAR rates by \$0.0057 per kWh. On October 12, 2020, in Docket No. E017/AA-19-297, Otter Tail requested approval to refund an additional \$8,383,674⁶ to account for the Company's EAR/FCA over-collections between April and September 2020. In its November 16, 2020 *Order* in the same docket, the Commission approved the \$8,383,674 refund, thereby reducing to the Company's January to June 2021 EAR/FCA rates by \$0.0061 per kWh.

On February 26, 2021, Otter Tail filed its 2020 True-Up of Energy Adjustment compliance filing seeking approval to refund (\$1,246,144) of estimated remaining over-recoveries from 2020 and Otter Tail's prior year true-up period. Otter Tail proposed a reduction of the September 2021 through August 2022 EAR by a rate of (\$0.0005) per kWh. The Commission approved Otter Tail's compliance filing authorizing the refund over the four-month period of September 1 through December 2021 with a reduction to EAR by a rate of (\$0.0014) per kWh.

On March 1, 2022, Otter Tail filed its 2021 FCA/EAR true-up filing in Docket No. E017/AA-20-462, seeking approval to collect \$700,126 of estimated remaining over-recoveries from 2021 and Otter Tail's prior year true-up periods. Otter Tail proposed the collection of under-recoveries over a four-month period from September 1, 2022 through December 31, 2022 with a true-up charge factor of \$0.0008 per kWh. The Commission approved Otter Tail's compliance filing authorizing the collection over the four-month period of September 1 through December 2022 with an increase to EAR by a rate of \$0.0008 per kWh.

⁴ See Table 1 of Otter Tail's August 14, 2020 filing in Docket No. E017/AA-20-462.

⁵ Attachment 1 of Otter Tail's May 14, 2020 filing in Docket No. E017/AA-19-297.

⁶ Attachment 1 of Otter Tail's October 12, 2020 filing in Docket No. E017/AA-19-297.

On July 27, 2022, Otter Tail filed a supplemental filing proposing a revision to its 2022 EAR rates for September through December, 2022. The supplemental filing was in response to higher than forecasted energy costs due to higher gas prices and wholesale energy market prices, to reduce the year-end under-collection, which they were projecting to be \$10.1 million.⁷ Per Ordering Point 3 in Docket No. E999/CI-03-802 and Ordering Point 6 in the Commission's December 2, 2021 Order in Docket No. E017/AA-21-311, no party objected following a 30-day notice period, so Otter Tail implemented the revised rates.⁸

On February 28, 2023, Otter Tail filed its 2022 FCA/EAR true-up filing in Docket No. E017/AA-21-311, seeking approval to collect \$9,411,883 of estimated remaining under-collection from 2022. Otter Tail proposed the collection of under-recoveries over a twelve-month period from September 1, 2023 through August 31, 2024 with a true-up charge factor of \$0.0036 per kWh. The Commission approved Otter Tail's compliance filing authorizing the collection over the twelve-month period of September 2023 through August 2024 with an increase to EAR by a rate of \$0.0036 per kWh.

On July 24, 2023, Otter Tail filed a supplemental filing in Docket No. E017/AA-22-214, proposing a revision to its 2023 EAR rates for September 2023 through August 2024. The supplemental filing was in response to lower than forecasted energy costs due to lower gas prices and wholesale energy market prices, to reduce the year-end over-collection, which they were projecting to be \$8.46 million.⁹ Per Ordering Point 3 in Docket No. E999/CI-03-802, no party objected following a 30-day notice period, so Otter Tail implemented the revised rates, which reduced the EAR rates by \$0.003275 per kWh.¹⁰

The current Petition provides the true-up between the Company's actual fuel/purchased power cost recovery through its EAR/FCA and the actual corresponding fuel/purchased power costs incurred by Otter Tail for the period of January 1 through December 31, 2023.

B. PURPOSE OF OTTER TAIL'S PETITION

Otter Tail explained the purpose of the current Petition is to (1) demonstrate Otter Tail's fuel and purchased power costs to serve its customers for 2023 were reasonable and prudent; (2) request Commission approval of the Company's 2023 FCA true-up and the resulting proposed true-up factor refund of \$0.0020 per kWh, to be applied to sales subject to the EAR/FCA over the period of September 1, 2024 through August 31, 2025,¹¹ and (3) request Commission approval of the EAR/FCA true-up compliance reporting required by Minnesota Rules 7825.2800 – 7825.2840 and applicable Commission orders.¹² The Department discusses each of these three areas in the following sections.

⁷ See the July 27, 2022 *Other-Supplemental Filing*, page 1 in the instant docket.

⁸ *Id.*

⁹ See the July 24, 2023 *Other-Supplemental Filing*, page 1 in the instant docket.

¹⁰ *Id.*

¹¹ See true-up factor and notes for item (8) in Department Attachment 2.

¹² Petition, pages 3 and 6.

C. PRUDENCY AND REASONABLENESS OF OTTER TAIL'S ACTUAL 2023 FUEL/PURCHASED POWER COSTS

Otter Tail's proposed true-up in this filing is a combination of an over-collection in 2023 of \$5,197,464 and a minor over-collection from 2022 of \$4,519, resulting in a total over-collection of \$5,201,983. Otter Tail's actual 2023 fuel/purchased power costs were lower than the forecasted costs that were approved and used to set the corresponding energy adjustment rates for 2023. According to the Company, it over-recovered 2023 fuel/purchased power costs primarily because:

- Higher-than-expected energy usage resulted in the Company having higher-than-forecasted energy sales for 2023. Otter Tail stated it saw material load growth in sales for all jurisdictions across its system and also attributed higher sales to weather since heating degree days (HDD) were 98.4% of normal and cooling degree days (CDD) were 127.2% of normal in 2023.¹³
- Actual 2023 energy market prices and gas prices were lower than those incorporated into Otter Tail's 2023 forecast.¹⁴

The following table summarizes and compares select energy sales and cost data relevant to Otter Tail's 2023 EAR/FCA true-up:

Department Table 1: Comparison of Select Actual and Forecasted Total Company Data for Otter Tail's 2023 Fuel Clause Adjustment True-up¹⁵

<i>Data Description</i>	<i>2023 Actual (A)</i>	<i>2023 Forecast (B)</i>	<i>Percentage Difference (A-B)/B</i>
MWh Sales Subject to Cost of Energy (COE)	5,818,926	5,612,089	3.69%
Total Cost of Fuel/Purchased Power	\$120,763,238	\$146,968,503	(17.83%)
Average Fuel/Purchased Power Cost Per MWh	\$20.75	\$26.19	(20.77%)

Department Table 1 shows Otter Tail's relevant 2023 MWh sales were 3.69% higher than forecasted and the Company's total system actual fuel/purchased power costs recoverable through the EAR/FCA for 2023 were 17.83% lower than the forecasted 2023 costs. Of the \$120,763,238 in actual 2023 fuel/purchased power costs, \$58,104,221 are allocated to Minnesota.¹⁶

¹³ Petition, page 9.

¹⁴ Petition, page 6.

¹⁵ Data in Department Table 1 retrieved from Petition Table 1.

¹⁶ Petition, pages 2-3 and Attachment 1.

The Company's actual and forecasted 2023 fuel/purchased power costs and offsetting credits/revenues can be broken into several major categories, as summarized in the following table:

Department Table 2: Otter Tail's Actual and Forecasted Total Company 2023 Fuel/Purchased Power Costs and Offsetting Credits/Revenues by Major Category¹⁷

<i>Fuel/Purchased Power Cost, Credit, or Revenue Category</i>	<i>2023 Actual (A)</i>	<i>2023 Forecast (B)</i>	<i>Percentage Difference (A-B)/B</i>
Plant Generation Costs	\$59,966,576	\$98,197,590	(38.93%)
Purchased Power Costs ¹⁸	\$92,485,212	\$71,765,611	28.87%
Wholesale Market Costs/(Credits)	(\$14,520,290)	\$89,717	(16,284.55%)
Wind Curtailment Costs	\$54,571	\$51,014	6.97%
Credit for Fuel Costs of Asset-Based Sales	(\$8,985,598)	(\$8,293,540)	8.34%
Revenue Margin on Asset-Based Sales	(\$3,062,156)	(\$10,833,123)	(71.73%)
MISO Ancillary Services Market Revenue	(\$534,507)	(\$606,147)	(11.82%)
Steam Plant Regents Costs	\$2,164,426	\$2,961,135	(26.91%)
Revenue Margin on Steam/Water Sales	(\$808,405)	(\$756,821)	6.82%
Revenue Margin on Planning Resource Auction	(\$4,185,366)	(\$3,890,000)	7.59%
Hoot Lake Solar Generation Credit	(\$1,811,225)	(\$1,716,934)	5.49%
<i>Total Costs, Net Credits and Revenues</i>	<i>\$120,763,238</i>	<i>\$146,968,503</i>	<i>(17.83%)</i>

Department Table 2 shows that Otter Tail's actual 2023 plant generation and purchased power costs were the two largest components of the Company's total net fuel/purchased power costs. Plant generation costs were substantially less than forecasted. Purchased power costs were substantially higher than forecasted. Otter Tail provided data in its Petition showing average actual on-peak and off-peak Locational Marginal Pricing (LMP) for 2023 were 32.47% and 34.95% lower than predicted, respectively.¹⁹ The Company explained the decrease LMP was due to: "Contributing factors to natural gas prices being lower than forecasted included weather, as well adequate supplies of natural gas produced and associated storage levels relative to demand."²⁰

¹⁷ Data in Department Table 2 retrieved from Petition Attachment 2.

¹⁸ Includes purchase power agreements, shared loads, Bilateral purchases, MISO and SPP Market purchases.

¹⁹ Petition, Table 1.

²⁰ Petition, page 12.

Because purchased power costs were so much greater than forecasted, the Department sent some information requests to Otter Tail asking for an explanation and received the following response:²¹

Otter Tail often enters into additional bilateral purchase contracts to hedge against the price volatility of market energy purchases that typically occur in the November through February time frame. The cost of these purchases is often influenced by forward price forecasts that exist within the natural gas and forward energy markets at the time those purchases are made. The increase in bilateral purchases for January 2023 was due in part to the unplanned outage at Big Stone Plant (as discussed and reviewed extensively in Otter Tail's 2022 annual true-up filing, Docket No. E017/AA-21-311) that began November 5, 2022, and ended February 6, 2023 and the desire to further reduce exposure to potentially volatile day ahead and real time market prices during that period. The increase in bilateral purchases in January coincides with a reduction in plant generation costs from the forecasted \$11,784,934 to actual costs of \$3,124,669 as shown in Attachment 3. While the volume of, and the overall costs of all purchased power were \$20.7 million higher than forecasted for 2023, the average cost was \$34.34/MWh compared to the forecasted average cost of \$44.10/MWh.

Otter Tail has little control over the market prices. Otter Tail is required to serve its load and does so through existing resources and purchases from bilateral contracts and the MISO market, which during the period of the Big Stone outage were higher than anticipated.

Otter Tail experienced an unplanned outage at Big Stone Plant that started in November 2022 continuing until February 2023, which contributed to the Company's actual 2023 purchased power costs being significantly higher than forecasted. This outage is further discussed and analyzed in section F below. Based on Otter Tail's actual experience in 2023, the Department concludes it is reasonable the Company's actual 2023 purchased power costs recoverable through the EAR/FCA were more than those forecasted.

D. OTTER TAIL'S 2023 FUEL CLAUSE ADJUSTMENT TRUE-UP

As noted earlier in the instant comments, the Company filed a supplemental filing proposing a revision to its 2023 EAR rates for September 2023 through August 2024. This was in response to lower than forecasted energy costs to reduce the year-end over-collection amount. As of March 1, 2024, the Company had an estimated remaining over-recovery amount of \$4,519 for 2022 and \$5,197,464 for 2023. Therefore, in the instant Petition, Otter Tail requests approval to refund to customers, the total over-recovery of \$5,201,983. Otter Tail's 2023 true-up calculation, which shows how the Company arrived at the proposed refund amount and true-up charge, is summarized in the following table:

²¹ Department Attachment 1.

Department Table 3: Otter Tail's 2023 Fuel Clause Adjustment True-Up and Refund Amount²²

<i>True-Up Component</i>	<i>Amount</i>
Estimated Remaining Amount to be Refunded for the Previously Approved 2022 True-Up (D) ²³	\$4,519
Estimated 2023 Over/(Under) Recovery Balance as of August 31, 2024 (E) ²⁴	<u>\$5,197,464</u>
<i>Proposed Refund to Customers (D + E) = (F)</i>	<u>\$5,201,983</u>
Forecasted Applicable kWh Sales for September 2024 - August 2025 (G)	2,615,076,901
<i>Proposed True-Up Factor (F / G)</i>	\$0.0020

Otter Tail requests the proposed \$0.0020 true-up refund be effective September 1, 2024 through August 31, 2025. The Department verified Otter Tail's 2023 true-up calculation followed the true-up methodology provided for in the Company's approved EAR Rate Schedule, Section 13.01.²⁵ Specifically, the Department confirmed Otter Tail's 2023 EAR/FCA true-up calculation:²⁶

- Was based on a historical twelve-month period (January 1 through December 31, 2023).
- Compared the actual and approved forecasted costs and credits/revenues to arrive at the under-recovered amount.
- Divided the over-recovered amount by the forecasted Minnesota kWh subject to the EAR/FCA (forecasted kWh for the proposed twelve-month period during which the true-up factor would be applied, September 2024 through December 2025) to arrive at the true-up factor per kWh.

The Department concludes Otter Tail correctly calculated its 2023 EAR/FCA true-up and the proposed true-up factor amount is reasonable. We recommend the Commission approve the Company's proposed net true-up over-recovery amount of \$5,201,983 with a corresponding true-up refund of \$0.0020 to be effective on September 1, 2024.

²² Data in Department Table 3 retrieved from Department Attachment 2.

²³ The \$4,519 is Otter Tail's estimate of the remaining amount to be refunded, as of March, 2024.

²⁴ The \$5,197,464 is Otter Tail's estimate of the remaining amount to be refunded, as of March, 2024.

²⁵ Petition Attachment 4 contains the EAR Rate Schedule, Section 13.01.

²⁶ Otter Tail's 2023 true-up calculation is shown in Petition Attachment 1 and Department Attachment 2.

E. COMPLIANCE WITH REPORTING REQUIREMENTS

The Department verified the instant Petition included the information required per the following:

- Minnesota Rules 7825.2800 - 7825.2840, as revised on pages 3 - 4 and approved in Point 1 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.²⁷
- Annual FCA true-up general reporting guidelines, as outlined on page 7 and approved in Point 5 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.²⁸
- Annual FCA true-up reporting compliance matrix specific to Otter Tail, as shown in Attachment 2 of the March 1, 2019 joint comments and approved in Point 7 of the Commission's June 12, 2019 *Order* in Docket No. E999/CI-03-802.²⁹

The Department concludes Otter Tail's Petition complies with the applicable reporting requirements and recommends the Commission approve the compliance reporting portions of the Company's Petition.

F. MAINTENANCE EXPENSES OF GENERATION PLANTS AND CORRELATION TO INCREMENTAL FORCED OUTAGE COSTS (IN THE MATTER OF THE REVIEW OF THE 2005 AAA OF CHARGES FOR ALL ELECTRIC UTILITIES, DOCKET NO. E999/AA-06-1208)

In its February 6, 2008 *Order* in Docket No. E999/AA-06-1208, the Commission required all electric utilities subject to automatic adjustment filing requirements, except for Dakota Electric, to include in future annual automatic adjustment filings the actual expenses pertaining to maintenance of generation plants, with a comparison to the generation maintenance budget from the utility's most recent rate case. The Commission established this reporting requirement in response to the dramatic increase in investor-owned utility outage costs during fiscal years 2006 and 2007.

When a generation plant experiences a forced outage, the utility must replace the megawatt hours that plant would have otherwise produced. The utility typically replaces these lost megawatt hours through wholesale market purchases. The cost of those market purchases flows through the EAR/FCA, directly to ratepayers. The high outage costs incurred by investor-owned utilities in fiscal years 2006 and 2007 raised questions as to whether the utilities were (1) maintaining plants appropriately to prevent forced outages, and (2) spending as much on plant maintenance as they were charging to their customers in base rates. The Commission agreed with the Department and the Large Power

²⁷ Provided in Petition Appendix A-Section 2, Appendix B, and Appendix C.

²⁸ Provided in Petition Attachment 2, Attachment 3, Attachment 13, and Appendix A – Section 6.

²⁹ Point 7 of the Commission's June 12, 2019 *Order* in Docket No. E-999/CI-03-802 also stated that "each Electric Utility shall provide a complete analysis and discussion of the consequences of self-commitment and self-scheduling of their generators, including the annual difference between production costs and corresponding prevailing market prices." The Company provided this analysis and discussion in its March 1, 2021 filing in Docket No. E999/CI-19-704. All other true-up reporting compliance required by Attachment 2 of the March 1, 2019 joint comments can be found in Attachments 1-20 and Appendix A, B, and C of the Petition.

Intervenors that “utilities have a duty to minimize unplanned facility outages through adequate maintenance and to minimize the costs of scheduled outages through careful planning, prudent timing, and efficient completion of scheduled work.”³⁰

The Department summarizes Otter Tail’s generation maintenance expenses for select years in the following table:

Department Table 4: Comparison of Otter Tail’s Generation Maintenance Expense³¹
(\$ Millions)

<i>Approved Annual Generation Maintenance Expense per 2021 Rate Case Test Year (A)</i>	<i>Actual Average 2021 – 2023 Generation Maintenance Expense (B)</i>	<i>Difference (B-A)/A</i>
\$19.9	\$20.3	2%

Department Table 4 shows that Otter Tail’s actual 2023 generation maintenance expenses were approximately 2% higher than the \$19.9 million provided for in the Company’s base rates approved in Docket No. E017/GR-20-719.

The Department compared Otter Tail’s forecasted to actual planned outages, which were relatively consistent. The Department review Otter Tail’s forced outages and noted the Company has eleven forced outages in excess of 24 hours in 2023 – six at Big Stone and five at Coyote Station. Otter Tail estimates the aggregate cost of the replacement power for the eleven forced outages for 2023 was **[TRADE SECRET DATA HAS BEEN EXCISED]**. Of that **[TRADE SECRET DATA HAS BEEN EXCISED]**³² was associated with an extended outage due to a bearing #7 vibration/exciter issue at Big Stone Plant, which began November 5, 2022 and ended February 6, 2023.³³

At the time of the 2022 filing, the Department sent an information request asking Otter Tail to provide more information regarding the cause, duration, and change in energy costs associated with the Big Stone outage event. Otter Tail’s response was extensive and concluded there were no human errors or avoidable incidents identified as the cause of the outage event.³⁴ Additionally, the Department sent an information request for the current filing. Otter Tail provided an attachment with the calculations estimating the cost of replacement power along with analysis on the increase in cost from 2022 to 2023.³⁵

Though the average market price was lower in 2023, market prices during the outage in January were significantly high. This drove the increase in the rate of the change in energy costs for the outage.³⁶ The

³⁰ Commission’s February 6, 2008 *Order* in Docket No. E999/AA-06-1208, page 5.

³¹ Data in Department Table 4 retrieved from Petition Attachment 12.

³² Petition, Appendix A Section 6, pages 3-4.

³³ Petition, page 16 and Appendix A Section 6, page 4.

³⁴ See Department Attachment 3 for full response.

³⁵ See Department Attachment 4 for full response.

³⁶ *Id.*

Department concludes the Company's replacement power costs corresponding to the 2023 generation forced outages were reasonable under the circumstances.

Because (1) the amount of generation maintenance expense is linked to a utility's forced outages, (2) utilities have an incentive to minimize generation maintenance expense between rate cases, and (3) utilities do not have a strong incentive to minimize the replacement power costs for which they receive flow through recovery, the Department intends to continue to monitor the difference between investor-owned utilities' actual and approved generation maintenance expenses in future FCA true-up filings.

III. CONCLUSION AND RECOMMENDATIONS

Based on our review, the Department concludes (1) Otter Tail's actual fuel/purchased power costs for 2023 were reasonable and prudent, (2) Otter Tail correctly calculated its 2023 fuel clause adjustment true-up and the resulting true-up over-collection amount of \$5,201,983 is reasonable, and (3) Otter Tail's Petition complies with the applicable reporting requirements. Therefore, the Department recommends the Commission take the following actions:

- Find that Otter Tail's actual 2023 fuel/purchased power costs recoverable through the EAR/FCA were reasonable and prudent for 2023.
- Approve Otter Tail's EAR/FCA 2023 true-up and the resulting over-recovery amount of \$5,201,983 and refund of \$0.0020.
- Allow Otter Tail to refund the \$5,201,983 true-up over-recovery over a twelve-month period, from September 1, 2024 through August 31, 2025.
- Approve the compliance reporting portions of Otter Tail's Petition.³⁷

³⁷ Compliance reporting requirements outlined on Petition, page 24.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-22-214

Response to: MN Department of Commerce

Analyst: Ashley Uphus

Date Received: March 08, 2024

Date Due: March 18, 2024

Date of Response: March 18, 2024

Responding Witness: Amber Stalboerger, Manager, Regulatory Analysis, 218-739-8728

Information Request:

Topic: Purchase Power - Bilateral

Reference(s): Annual True-Up Report, Attachment 2, Page 1 of 1 and Attachment 3, Page 74 of 78

Request:

Otter Tail Power's Total Company Purchased Power actual 2023 costs were \$20,719,600 higher than forecasted. Please address the following questions regarding Purchased Power Bilateral costs:

- A. Please explain why Total Purchase Power Bilateral Actuals were \$18,935,448 higher than forecasted and why this cost is reasonable to charge ratepayers through the 2023 FCA true-up?
- B. Please explain why "Bilateral Purchases" were forecasted to be **[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]**, but actual total cost was **[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]** for 2023. Please explain why this is reasonable to charge ratepayers through the 2023 FCA true-up.

Attachments: 0

Response:

Information in the above request includes price data that is generally not made public (the "Protected Data"). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes 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).

- A. Otter Tail often enters into additional bilateral purchase contracts to hedge against the price volatility of market energy purchases that typically occur in the November through February time frame. The cost of these purchases is often influenced by forward price forecasts that exist within the natural gas and forward energy markets at the time those purchases are made. The increase in bilateral purchases for January 2023 was due in part to the unplanned outage at Big Stone Plant(as discussed and reviewed extensively in Otter Tail's 2022 annual true-up filing, Docket No. E017/AA-21-311) that began November 5, 2022, and ended February 6, 2023 and the desire to further reduce exposure to potentially volatile day ahead and real time market prices during that period. The increase in bilateral purchases in January coincides with a reduction in plant generation costs from the forecasted \$11,784,934 to actual costs of \$3,124,669 as shown in Attachment 3. While the volume of, and the overall costs of all purchased power were \$20.7 million higher than forecasted for 2023, the average cost was \$34.34/MWh compared to the forecasted average cost of \$44.10/MWh.

Otter Tail has little control over market prices. Otter Tail is required to serve its load and does so through existing resources and purchases from bilateral contracts and the MISO market, which during the period of the Big Stone outage were higher than anticipated.

- B. See response to A.

Otter Tail Power Company True-Up for kWh Subject to Energy Adjustment Rider (EAR)
Docket No. E017/AA-22-214
Annual True-Up Period of January 2023 through December 2023

		Jan-23	Feb-23	Mar-23	Apr-23	May-23	Jun-23	Jul-23	Aug-23	Sep-23	Oct-23	Nov-23	Dec-23	YTD 2023 Total
1	Total System Sales (kWh)	591,233,807	552,289,646	524,700,322	508,152,664	442,834,206	450,001,744	455,886,179	440,330,683	440,438,337	425,758,081	475,685,935	511,614,225	5,818,925,830
2	Total System Energy Cost	\$27,210,249	\$12,675,210	\$10,918,174	\$5,136,309	\$4,132,171	\$7,035,859	\$9,085,148	\$7,740,621	\$6,954,567	\$9,322,425	\$9,617,198	\$10,935,307	\$120,763,238
3	MN kWh Sales Subject to Energy Adjustment Rider (EAR)	273,454,575	265,102,290	246,864,724	239,287,164	205,760,058	231,349,109	221,646,956	221,046,016	220,407,377	202,832,435	227,297,710	244,679,004	2,799,727,419
4	MN FCA Revenue (Line 11-Line 6-Line 8)	\$7,519,000	\$9,032,231	\$7,758,996	\$6,643,947	\$4,367,379	\$5,098,493	\$5,081,600	\$5,529,665	\$4,071,252	\$4,303,926	\$5,496,550	\$6,964,956	\$71,867,995
5	2022 True Up	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.003600	\$0.003600	\$0.003600	\$0.003600	
6	2022 True Up (line 3 * line 5)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$793,467	\$730,197	\$818,272	\$880,844	\$3,222,779
7	2023 Supplemental	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	\$0.0000	(\$0.003275)	(\$0.003275)	(\$0.003275)	(\$0.003275)	
8	2023 True Up (line 3 * line 7)	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	(\$721,834)	(\$664,276)	(\$744,400)	(\$801,324)	(\$2,931,834)
9														
10														
11	Collection	\$7,519,000	\$9,032,231	\$7,758,996	\$6,643,947	\$4,367,379	\$5,098,493	\$5,081,600	\$5,529,665	\$4,142,885	\$4,369,847	\$5,570,422	\$7,044,476	\$71,577,050
12														
13	MN FCA Revenue (Line 4)													(1) \$71,867,995
14	Actual Energy Cost													(2) \$58,104,221
15	Over/(Under) Recovery for 2023 FCA Year													(3) \$13,763,774
16														
17														
18	Projected Cumulative Over/(Under) for 2022 FCA Year as of 08/31/2024													(4) \$ 4,519
	Projected Cumulative Over/(Under) for 2023 FCA Year as of 08/31/2024													(5) \$ 5,197,464
19	Projected Current Over/(Under) to Customers as of 08/31/2024													(6) \$ 5,201,983
20	Forecasted kWh Sept. 2024 - Aug. 2025													(7) 2,615,076,901
21	Annual True-up Factor Over/(Under)													(8) \$0.002000
(1) Total adjusted recovery: Sum of recovery from FCA and recovery from base cost														
(2) Actual energy cost: MN kwh sales subject to COE / total sys sales x total sys energy cost														
(3) Over/under recovery: total adjusted recovery - actual energy cost														
(4) Cumulative Over/(Under) Recovery of prior period(s)														
(5) Cumulative Over/(Under) Recovery of current year														
(6) Sum of current year Over/(Under) recovery and Cumulative of prior period(s)														
(7) Forecasted kWh - Energy Adjustment Rider, Section 13.01 - "The over- or under- recovery amount as shown in the current year Annual Automatic Adjustment True-up report will be divided by the forecasted Minnesota Kilowatt-Hours subject to the fuel adjustment clause for the proposed twelve month recovery period the true-up rate will be in effect and then multiplied by the applicable EAF ratio."														
(8) Refund to customers / Forecasted kWh September 2024 through August 2025														
(4) % Over/(Under) Recovery					8.95%									
% of MN sales (subject to FCA) to system					48.1142%									
Energy costs allocated to MN for sales subject to FCA					\$58,104,221					\$0				

Line No.	2022 FCA Forecast / True Up (Docket No E017/AA-21-311)			Notes
1	Approved True-up Amount - over/(under) collection			\$ (9,411,883)
2	Amount collected / (refunded) September 2023 through December 2023:			\$ 3,222,779 Rate = \$0.0036
3	Forecasted amount collected / (refunded) January 2024 through August 2024:	1,720,450,740 kWh	\$ 6,193,623	Rate = \$0.0036
4	Final Balance - over/(under) collection			\$ 4,519
	(1) OTP estimated an amount of (\$9,411,883) in March 1, 2023 True Up filing.			
2023 FCA Forecast / Supplemental (Docket No E017/AA-22-214)				Notes
5	Approved Supplemental- over/(under) collection			\$13,763,774
6	Amount collected / (refunded) September 2023 through December 2023:			(\$2,931,834) Rate = (\$0.003275)
7	Forecasted amount collected / (refunded) January 2024 through August 2024:	1,720,450,740 kWh	(\$5,634,476)	Rate = (\$0.003275)
8	Supplemental Balance - over/(under) collection			\$ 5,197,464
	Final amount of Over/(Under)-collection			
Net FCA Forecast				Notes
9	2022 FCA Forecast / True Up (Docket No E017/AA-21-311) Balance			\$ 4,519
10	2023 FCA Forecast / Supplemental (Docket No E017/AA-22-214) Balance			\$ 5,197,464
11				
12	Final Balance - over/(under) collection			\$ 5,201,983
	Final amount of Over/(Under)-collection			

OTTER TAIL POWER COMPANY

Docket No: E017-AA-21-311

Response to: MN Department of Commerce

Analyst: Felicia Cullen

Date Received: March 09, 2023

Date Due: March 20, 2023

Date of Response: March 22, 2023

Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

Information Request:

- A. Please provide additional information regard the cause of the November 5, 2022 to January 1, 2023 Big Stone plant outage.
- B. Please provide any reports or root cause analysis of this outage event.
- C. Where there any human errors or other avoidable incidents that occurred as part of this outage event? Please explain.
- D. Why was this outage so long - 56.3 days?
- E. Please provide supporting calculation for the “Change in Energy Costs” related to this outage event.

Attachments: 1

Attachment 1 to IR MN-DOC-019_NOTPUBLIC.xlsx

Response:

Attachment 1 to IR MN-DOC-019 contains economic data including the dispatch offer price of the generating unit (the “Protected Data”). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes 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).

- A. On November 5, 2022, while the plant was operating, a sudden increase in bearing vibration on the exciter end of the generator was observed. The exciter system is used to control the strength of the generator rotor’s electric field. The exciter rotor is a large component that connects to the flanged end of the generator rotor. The vibration monitoring on the bearings that support the exciter rotor is what first gave the indication of a problem. Following detection of the vibration, the plant was then shut down to

mitigate any potential for further damage or issues due to the uncertainty of the cause of the vibration.

Otter Tail consulted with Siemens, the original equipment supplier (who acquired Westinghouse), to explore options as we investigated the issue. Significant work was undertaken to search for an indication of an issue that would cause vibration, such as a loose component or a failed component that was cracked or otherwise damaged. By November 8th, and after consultation with our co-owners, the decision was made to pursue a used exciter rotor that Siemens indicated would be available to use if it could be certified for use at the Siemens shop. The questionable Big Stone exciter rotor could then be inspected at the Siemens shop, possibly refurbished, while the Big Stone Plant could get back in service as quickly as possible. Both Siemens and the co-owners were in frequent discussion in trying to explore reasonable options to getting the unit back in service as soon as possible. Even though no clear indications of a failed component were found, Otter Tail, the Big Stone Plant co-owners, or Siemens did not favor putting the unit back in service with the questionable exciter rotor. The risk to the plant equipment and the safety of the personnel operating the plant are always at the forefront of difficult decisions like this. Around November 21, 2022, Siemens informed Otter Tail that the potential spare rotor was not able to be certified. Unfortunately, during Siemens' certification process, the potential replacement rotor was found to have defects and ultimately determined that it could not be used.

Otter Tail, the Big Stone Co-owners, and Siemens, working together, determined the possible next steps. All parties were working extensively to find a solution to the complex problem given the approaching winter season and the need to have the plant in-service. Given that completely rebuilding the exciter rotor could take 6-12 months, the possibility of bringing a mobile static exciter to be retrofitted to the Big Stone generator was suggested as a possible solution by Siemens. There are very few of these types of units available from Siemens and they are used in these cases to get a unit back in service as quickly as possible if a failure of the excitation system occurs. There was also experience from the co-ownership group with this type of solution, which gave collective confidence to bringing Big Stone back on-line as quickly as possible. Installing a mobile exciter quickly is no small feat. The equipment must be brought to the plant (it is not small) and significant work in removing the original rotating exciter equipment with the static exciter equipment was undertaken. Work began connecting the mobile exciter to the generator which involved completely removing the existing Big Stone Plant exciter and base to allow for the mobile exciter to be connected. Connection involved procuring necessary materials for the installation, providing necessary power supplies, bypassing existing control circuits/logic, while retaining control and equipment protections.

After significant effort by both Big Stone Plant and Siemens personnel the installation of the temporary mobile exciter was completed, and on December 9, 2022, startup with the mobile exciter was initiated. Due to vibration readings that were unexpected, the unit was shut down before reaching full speed. Siemens was consulted for purposes of gathering data for balance calculations upon subsequent restart. During that subsequent restart, a

radial lead on the generator liberated from the generator shaft and the unit was again shut down. The radial lead is part of the electrical circuit between the exciter and generator, it is attached to the generator rotor axial lead (the spinning portion of the generator). Disassembly and inspection of the damage from the radial lead issue commenced to determine what repairs and associated materials would be needed and the estimated lead time to complete those repairs. The radial lead is approximately 5 pounds and is an electrical connection that can be considered as a threaded connection that secures into the generator shaft with an electrical connecting lead to the exciter system. The radial lead copper strap, nut and retaining wedges came free from the generator shaft at 3400 rpm (revolutions per minute). These parts became projectiles; the radial lead and copper strap struck a handrail near the turbine deck and caused significant impact damage to the steel handrail. While the damage caused on the handrail was not a significant issue related to generation output, the event was a significant safety event and if personnel had been in the vicinity, it could have been the cause of a serious injury. Due to the extensive effort and hours of the personnel that were working, the decision was made by plant management to send all personnel home (it happened on a Friday) until Monday, where all could regroup and come up with an adjusted plan.

In subsequent days, it was determined that the axial leads in the generator, which the radial lead (which came free) connects, must be removed from the generator shaft, and inspected to ensure safe operation of the Big Stone generator.

At this writing in March 2023, Big Stone has been back on-line since mid-February. However, even at that, and after the events described above, Otter Tail has contracted with a third party (Brush Group) to refurbish the original exciter rotor and the minimum time to complete this work is 5-6 months (since work has not yet commenced, it cannot be said with certainty what will be found or the exact duration for refurbishment).

- B. A root cause analysis for the Nov 5, 2022 event involved review of the vibration data and initial inspection of the exciter. A third-party contractor (Brush Group) will be conducting a forensic discovery during the refurbishment of the exciter, which is currently planned for the April/May 2023 timeframe.
- C. No human errors or other avoidable incidents have been identified as cause for the outage event.
- D. The actual outage extended until early February 2023 with start-up activities beginning February 7, 2023, and the plant coming back online February 9, 2023. See additional detail in Response to A., above. The outage restoration was impacted by the availability of qualified contract labor and long lead times for materials to repair the damaged equipment following the December 9, 2022, event.
- E. See Attachment 1 to IR MN-DOC-019 for the calculation estimating the cost of replacement power.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-22-214

Response to: MN Department of Commerce

Analyst: Ashley Uphus

Date Received: March 08, 2024

Date Due: March 18, 2024

Date of Response: March 18, 2024

Responding Witness: Amber Stalboerger, Manager, Regulatory Analysis, 218-739-8728

Information Request:

Topic: Plant Outage for Big Stone

Reference(s): Attachment 13

Request:

- A. Please provide supporting calculation for the “Change in Energy Costs” related to this outage event.
- B. Please provide analysis for why the costs increased for this outage in 2023 when there were (1) less days affected in 2023 than 2022 and (2) market prices decreased in 2023.
- C. Did you receive any insurance proceeds or other revenue in relation to this outage event? If yes, please provide the amounts and explain why proceeds and revenue were not included in the 2023 FCA true-up.

Attachments: 0

Response:

The information marked in the table below includes volume and average market price data that is generally not made public (the “Protected Data”). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes 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).

- A. The change in energy costs related to the Big Stone Plant are calculated based on the difference between the average purchase cost and unit incremental cost. This difference is then multiplied by the MWh replaced with the purchases. The primary cause of the increase in cost for 2023 compared to 2022 is the change in average purchase cost. The table below shows this calculation.

The average purchase cost is derived from the January and February tables in Attachment 3, and the average cost calculation is shown in the table below.

B. See response for section A.

¹ Total repair cost was \$2,840,325 less \$1,500,000 deductible equals \$1,340,325 insurance proceeds.

CERTIFICATE OF SERVICE

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce
Public Comments**

Docket No. E017/M-22-214

Dated this 15th day of **April 2024**

/s/Sharon Ferguson

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mariah	Bevins	Maria.Bevins@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-214_AA-22-214
Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_22-214_AA-22-214
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_22-214_AA-22-214
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	Yes	OFF_SL_22-214_AA-22-214
Jason	Decker	jason.decker@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-214_AA-22-214
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_22-214_AA-22-214
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_22-214_AA-22-214
Remi	Engbers	remi.engbers@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_22-214_AA-22-214
Kelly C.	Engebretson	Kelly.Engebretson@lawmoss.com	Moss & Barnett	150 S. 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-214_AA-22-214
Michael	Fairbanks	Michael.Fairbanks@whitearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_22-214_AA-22-214

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-214_AA-22-214
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_22-214_AA-22-214
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_22-214_AA-22-214
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_22-214_AA-22-214
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_22-214_AA-22-214
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_22-214_AA-22-214
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_22-214_AA-22-214
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	Yes	OFF_SL_22-214_AA-22-214
Faron	Jackson, Sr.	faron.jackson@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_22-214_AA-22-214
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-214_AA-22-214

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	OFF_SL_22-214_AA-22-214
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-214_AA-22-214
Bill	Lachowitz	blachowitz@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Ave S Burnsville, MN 55337-3527	Electronic Service	No	OFF_SL_22-214_AA-22-214
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-214_AA-22-214
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_22-214_AA-22-214
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_22-214_AA-22-214
Tim	Miller	Tim.Miller@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_22-214_AA-22-214
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-214_AA-22-214
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-214_AA-22-214
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S Duluth, MN 55802	Electronic Service	No	OFF_SL_22-214_AA-22-214

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_22-214_AA-22-214
William	Rader	wrader@otpc.com	Otter Tail Power Company	215 South Cascade St Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-214_AA-22-214
Rate Case Inbox	Rate Case Inbox	mnratecase@otpc.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_22-214_AA-22-214
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_22-214_AA-22-214
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_22-214_AA-22-214
Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_22-214_AA-22-214
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_22-214_AA-22-214
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