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July 24, 2024

Will Seuffert  
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 Forecasted Rates for its Energy Adjustment Rider,  
Rate Schedule Section 13.01  
Docket No. E017/AA-24-065  
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company hereby submits to the Minnesota Public Utilities Commission its Reply Comments in the above described matter.

If you have any questions regarding this filing, please contact me at 218-739-8282 or at [cbyrnes@otpco.com](mailto:cbyrnes@otpco.com).

Sincerely,

*/s/ CHRISTOPHER BYRNES*  
Christopher Byrnes  
Supervisor, Regulatory Analysis  
Regulatory Economics

vjm  
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 Forecasted Rates for its  
Energy Adjustment Rider, Rate  
Schedule Section 13.01**

**Docket No. E017/AA-24-065**

**REPLY COMMENTS**

**I. INTRODUCTION**

On May 1, 2024, Otter Tail Power Company (Otter Tail) petitioned the Minnesota Public Utilities Commission (Commission) for approval of its 2025 forecasted Energy Adjustment Rider (EAR) rates (May 2024 Filing) in response to decisions rendered by the Commission in Docket No. E999/CI-03-802 and where applicable, in compliance with annual reporting requirements pursuant to Minn. R. 7825.2800 to 7825.2840 governing Automatic Adjustment of Charges and prior Otter Tail Fuel Clause Adjustment (FCA) forecast dockets.

On July 1, 2024, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments in the above captioned docket recommending the Commission approve Otter Tail’s proposed 2025 net system FCA costs and associated rates. Otter Tail appreciates the Department’s thorough and thoughtful analysis of Otter Tail’s May 2024 Filing.

Otter Tail would like to note that since the May 2024 filing, Otter Tail filed a supplemental filing to Docket No. E017/AA-23-181 returning approximately \$12 million due to an overcollection from January 2024 to April 2024 that will be refunded from July 2024 to December 2024. Since Otter Tail’s May 2024 filing 2025 forward natural gas pricing forecasts and Locational Marginal Price (LMP) forecasts have been falling. Compared to the forward energy pricing used in Otter Tail’s May 2024 Filing,<sup>1</sup> the Peak and the Off-Peak OTP. OTP load zone LMPs decreased on average approximately \$2.62/MWh (5 percent decrease) per month and \$4.22/MWh (11 percent decrease) per month, respectively.<sup>2</sup> The Ventura Hub decreased on average approximately \$0.09/MMBtu (2 percent decrease) per month.<sup>3</sup>

Otter Tail’s “refresh” of its 2025 FCA forecast and associated rates for 2025 did not produce a material change of more than five percent; and, therefore, Otter Tail will continue to use its May 2024 filing forecast. Otter Tail will keep the Commission apprised if forward market energy prices are suspected to have a significant impact on Otter Tail’s 2025 forecast and associated rates.

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<sup>1</sup> Forward natural gas and LMP pricing in Otter Tail’s May 2024 filing is from April 1, 2024.

<sup>2</sup> Based on forward LMP pricing from July 1, 2024.

<sup>3</sup> Based on forward natural gas pricing from June 28, 2024.

## II. OTTER TAIL RESPONSES

Otter Tail provides responses to the following comments raised by the Department in its Comments filed on July 1, 2024:

*“The Department requests Otter Tail provide information on the 2024 MISO actual PRA costs and revenues in Otter Tail’s reply comments.”*

The MISO 2024/2025 Planning Resource Auction (PRA) revenues Otter Tail received in May 2024 were \$555,213. As discussed in the May 2024 filing, the PRA revenues are immaterial representing under a quarter percentage point change. Otter Tail proposes they be included in the 2025 annual FCA True-Up filing.

## III. REQUEST

Otter Tail appreciates the Department’s thorough and thoughtful analysis of Otter Tail’s May 2024 Filing. No material changes have occurred that warrant updating Otter Tail’s forecasted rates for 2025. Otter Tail supports the Department’s recommendations as listed in Section III of their July 1, 2024, Comments, and requests the Commission approve Otter Tail’s 2025 FCA forecast and associated rates submitted in its May 2024 filing.

Dated: July 24, 2024

Respectfully submitted,  
OTTER TAIL POWER COMPANY

By: /s/ Christopher Byrnes  
Christopher Byrnes  
Supervisor, Regulatory Analysis  
Regulatory Economics  
Otter Tail Power Company  
215 S. Cascade Street  
Fergus Falls, MN 56537  
(218) 739-8282

## CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01  
Docket No. E017/AA-24-065**

I, Valerie Moxness 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 24<sup>th</sup> day of July, 2024.

/S/ Valerie Moxness  
Valerie Moxness  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8346

| First Name     | Last Name          | Email                             | Company Name                               | Address  | Delivery Method    | View Trade Secret | Service List Name     |
|----------------|--------------------|-----------------------------------|--|--|--------------------|-------------------|-----------------------|
| Mariah         | Bevins             | Maria.Bevins@whiteearthnnsn.gov   | White Earth Reservation Business Committee | PO Box 418<br><br>White Earth,<br>MN<br>56591  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Tom            | Boyko              | tboyko@eastriver.coop             | East River Electric Power Coop.            | 211 S. Harth Ave<br><br>Madison,<br>SD<br>57042  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Chris          | Byrnes             | cbyrnes@otpc.com                  | Otter Tail Power Company                   | 215 South Cascade Street<br><br>Fergus Falls,<br>MN<br>56538-0496  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Ray            | Choquette          | rchoquette@agp.com                | Ag Processing Inc.                         | 12700 West Dodge Road<br>PO Box 2047<br>Omaha,<br>NE<br>68103-2047                                       | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC         | 445 Minnesota Street Suite 1400<br><br>St. Paul,<br>MN<br>55101  | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |
| Jason          | Decker             | jason.decker@llojbwe.net          | Leech Lake Band of Ojibwe                  | 190 Sailstar Drive NW<br><br>Cass Lake,<br>MN<br>56633   | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Richard        | Dornfeld           | Richard.Dornfeld@ag.state.mn.us   | Office of the Attorney General-DOC         | Minnesota Attorney General's Office<br>445 Minnesota Street,<br>Suite 1800<br>Saint Paul,<br>MN<br>55101 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Charles        | Drayton            | charles.drayton@enbridge.com      | Enbridge Energy Company, Inc.              | 7701 France Ave S Ste 600<br><br>Edina,<br>MN<br>55435   | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Remi           | Engbers            | remi.engbers@woodsfuller.com      | Woods, Fuller, Shultz & Smith P.C.         | 300 S Phillips Ave Ste 300<br>PO Box 5027<br>Sioux Falls,<br>SD<br>57117-5027                            | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Kelly C.       | Engebretson        | Kelly.Engebretson@lawmoss.com     | Moss & Barnett                             | 150 S. 5th St #1200<br><br>Minneapolis,<br>MN<br>55402   | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |

| First Name | Last Name    | Email                                | Company Name                               | Address   | Delivery Method    | View Trade Secret | Service List Name     |
|------------|--------------|--------------------------------------|--|---|--------------------|-------------------|-----------------------|
| Michael    | Fairbanks    | Michael.Fairbanks@whiteearth-nsn.gov | White Earth Reservation Business Committee | PO Box 418<br>White Earth,<br>MN<br>56591                       | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Sharon     | Ferguson     | sharon.ferguson@state.mn.us          | Department of Commerce                     | 85 7th Place E Ste 280<br>Saint Paul,<br>MN<br>551012198        | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Jessica    | Fyhrie       | jfyhrie@otpc.com                     | Otter Tail Power Company                   | PO Box 496<br>Fergus Falls,<br>MN<br>56538-0496                 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Edward     | Garvey       | garveyed@aol.com                     | Residence                                  | 32 Lawton St<br>Saint Paul,<br>MN<br>55102                      | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Adam       | Heinen       | aheinen@dakotaelectric.com           | Dakota Electric Association                | 4300 220th St W<br>Farmington,<br>MN<br>55024                   | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Annete     | Henkel       | mui@mutilityinvestors.org            | Minnesota Utility Investors                | 413 Wacouta Street<br>#230<br>St. Paul,<br>MN<br>55101          | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Kristin    | Henry        | kristin.henry@sierraclub.org         | Sierra Club                                | 2101 Webster St Ste 1300<br>Oakland,<br>CA<br>94612             | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Katherine  | Hinderlie    | katherine.hinderlie@ag.state.mn.us   | Office of the Attorney General-DOC         | 445 Minnesota St<br>Suite 1400<br>St. Paul,<br>MN<br>55101-2134 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Faron      | Jackson, Sr. | faron.jackson@llojibwe.net           | Leech Lake Band of Ojibwe                  | 190 Sailstar Drive NW<br>Cass Lake,<br>MN<br>56633              | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Richard    | Johnson      | Rick.Johnson@lawmoss.com             | Moss & Barnett                             | 150 S. 5th Street<br>Suite 1200<br>Minneapolis,<br>MN<br>55402  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |

| 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<br><br>Duluth, MN 55802           | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Michael    | Krikava   | mkrikava@taftlaw.com         | Taft Stettinius & Hollister LLP   | 2200 IDS Center<br>80 S 8th St<br>Minneapolis, MN 55402       | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Bill       | Lachowitz | blachowitz@ibewlocal949.org  | IBEW Local Union 949              | 12908 Nicollet Ave S<br><br>Burnsville, MN 55337-3527         | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| James D.   | Larson    | james.larson@avantenergy.com | Avant Energy Services             | 220 S 6th St Ste 1300<br><br>Minneapolis, MN 55402            | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Eric       | Lipman    | eric.lipman@state.mn.us      | Office of Administrative Hearings | PO Box 64620<br><br>St. Paul, MN 551640620                    | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Kavita     | Maini     | kmairi@wi.rr.com             | KM Energy Consulting, LLC         | 961 N Lost Woods Rd<br><br>Oconomowoc, WI 53066               | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Tim        | Miller    | Tim.Miller@mrenergy.com      | Missouri River Energy Services    | 3724 W Avera Dr<br>PO Box 88920<br>Sioux Falls, SD 57109-8920 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Andrew     | Moratzka  | andrew.moratzka@stoel.com    | Stoel Rives LLP                   | 33 South Sixth St Ste 4200<br><br>Minneapolis, MN 55402       | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Matthew    | Olsen     | molsen@otpc.com              | Otter Tail Power Company          | 215 South Cascade Street<br><br>Fergus Falls, MN 56537        | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Marcia     | Podratz   | mpodratz@mnpower.com         | Minnesota Power                   | 30 W Superior S<br><br>Duluth, MN 55802                       | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |

| First Name      | Last Name                      | Email                                   | Company Name                       | Address  | Delivery Method    | View Trade Secret | Service List Name     |
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| David G.        | Prazak                         | dprazak@otpc.com                        | Otter Tail Power Company           | P.O. Box 496<br>215 South Cascade Street<br>Fergus Falls,<br>MN<br>565380496 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Rate Case Inbox | Rate Case Inbox                | mnrates@otpc.com                        | Otter Tail                         | N/A  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Generic Notice  | Regulatory                     | regulatory_filing_coordinators@otpc.com | Otter Tail Power Company           | 215 S. Cascade Street<br><br>Fergus Falls,<br>MN<br>56537                    | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |
| Generic Notice  | Residential Utilities Division | residential.utilities@ag.state.mn.us    | Office of the Attorney General-RUD | 1400 BRM Tower<br>445 Minnesota St<br>St. Paul,<br>MN<br>551012131           | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |
| Peter           | Scholtz                        | peter.scholtz@ag.state.mn.us            | Office of the Attorney General-RUD | Suite 1400<br>445 Minnesota Street<br>St. Paul,<br>MN<br>55101-2131          | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Robert H.       | Schulte                        | rhs@schultheassociates.com              | Schulte Associates LLC             | 1742 Patriot Rd<br><br>Northfield,<br>MN<br>55057                            | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Will            | Seuffert                       | Will.Seuffert@state.mn.us               | Public Utilities Commission        | 121 7th PI E Ste 350<br><br>Saint Paul,<br>MN<br>55101                       | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |
| Janet           | Shaddix Elling                 | jshaddix@janetshaddix.com               | Shaddix And Associates             | 7400 Lyndale Ave S Ste 190<br><br>Richfield,<br>MN<br>55423                  | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Amber           | Stalboerger                    | astalboerger@otpc.com                   | Otter Tail Power Company           | 215 South Cascade St.<br>PO Box 496<br>Fergus Falls,<br>MN<br>56538-0496     | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |
| Cary            | Stephenson                     | cStephenson@otpc.com                    | Otter Tail Power Company           | 215 South Cascade Street<br><br>Fergus Falls,<br>MN<br>56537                 | Electronic Service | Yes               | OFF_SL_24-65_AA-24-65 |



| First Name | Last Name  | Email                          | Company Name                                  | Address   | Delivery Method    | View Trade Secret | Service List Name     |
|------------|------------|--------------------------------|---|---|--------------------|-------------------|-----------------------|
| William    | Taylor     | bill.taylor@taylorlawsd.com    | Taylor Law Firm                               | 4820 E. 57th Street<br>Suite B<br>Sioux Falls,<br>SD<br>57108                     | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Stuart     | Tommerdahl | stommerdahl@otpc.com           | Otter Tail Power Company                      | 215 S Cascade St<br>PO Box 496<br>Fergus Falls,<br>MN<br>56537                    | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Pat        | Treseler   | pat.jcplaw@comcast.net         | Paulson Law Office LTD                        | 4445 W 77th Street<br>Suite 224<br>Edina,<br>MN<br>55435                          | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Laurie     | Williams   | laurie.williams@sierraclub.org | Sierra Club                                   | Environmental Law<br>Program<br>1536 Wynkoop St Ste 200<br>Denver,<br>CO<br>80202 | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Laurie     | York       | laurie.york@whiteearth-nsn.gov | White Earth Reservation<br>Business Committee | PO Box 418<br><br>White Earth,<br>MN<br>56591                                     | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |
| Patrick    | Zomer      | Pat.Zomer@lawmoss.com          | Moss & Barnett PA                             | 150 S 5th St #1200<br><br>Minneapolis,<br>MN<br>55402                             | Electronic Service | No                | OFF_SL_24-65_AA-24-65 |