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December 4, 2025

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

**RE: In the Matter of Otter Tail Power Company's 2023 Integrated Distribution Plan  
Docket No. E017/M-23-380  
Reply Comments**

Dear Ms. Bergman:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments for approval of a new Electric Vehicle Charging Rider and the corresponding tariff.

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

If you have any questions regarding this filing, please contact me at 218-739-8639 or at [jgrenier@otpc.com](mailto:jgrenier@otpc.com).

Sincerely,

*/S/ Jason Grenier*  
Jason Grenier  
Manager, Retail Energy Solutions

kde  
Enclosures  
By electronic filing  
c: Service Lists

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

**In the Matter of Otter Tail Power  
Company's 2023 Integrated  
Distribution Plan**

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

**I. INTRODUCTION**

On October 3, 2025 Otter Tail Power (the Company) filed a petition with the Minnesota Public Utilities Commission (Commission) requesting approval of a proposed Electric Vehicle Credit Rider (EVCR), also known as Evantage, and the corresponding tariff. The Company requested the following items in its petition:

1. Approve the proposed Electric Vehicle Credit Rider.
2. Approve the new Section 14.05 Rate Schedule pertaining to the EVCR.
3. Approve the Company's proposal to recover the Company's investments and expenses related to the EVCR within its Energy Conservation Optimization Program.

On November 18, 2025, the Minnesota Department of Commerce (Department) issued comments regarding the Company's proposal. Additionally, on November 18, 2025, the Clean Energy Groups (CEGs) submitted comments in response to the Commission's October 15, 2025 Notice of Comment Period. These Reply Comments address questions and recommendations within the Department's and CEGs' comments.

**II. OTTER TAIL POWER RESPONSES TO THE DEPARTMENT**

Otter Tail Power appreciates the Department's thorough review of the Company's petition. The Company believes that the two parties are in close alignment. The Department made the following recommendations in its comments:

1. The Department recommends the Commission approve Otter Tail Power's EVCR.
2. The Department recommends the Commission approve the Company's tariff pages.
3. The Department recommends Otter Tail Power further investigate the feasibility of adding an opt-out capability to its rate design in the future and

provide additional detail on its “system limitations” and a timeline for when the opt-out capability could be implemented.

Otter Tail Power is grateful for the Department’s recommendation to the Commission to approve the Company’s EVCR and tariff pages. Additionally, the Company will continue to research ways it might add improved opt-out capabilities to its load management rates in the future. The Company’s current Load Management System (LMS) utilizes one-way radio communications to send signals to equipment in the field for load shedding so there is no way for a customer to opt-out of control events directly from its end. Despite this, customers do have the ability to contact Otter Tail Power’s Customer Service and request a temporary bypass of controls for their accounts. Otter Tail Power is currently working to replace its LMS with an Advanced Load Management (ALM) system that would be capable of two-way communication to-and-from field devices and would enable new design options for load control rates that could help improve the customer’s experience. An opt-out capability is one option that the Company wants to investigate following the implementation of the new ALM system.

In the Department’s analysis, the Department refers to the Commission’s November 6, 2025 Agenda Meeting, discussing Otter Tail Power’s Thermal Market Energy Pricing rider, where Commissioners asked the Company to revise the use of the legacy term “rider.” The Department further notes the Company’s use of the title “rider” within the EVCR tariff and that the proposed tariff will require the same revision. The Company included the legacy term “rider” in its petition to remain consistent with the other programs currently offered. The Company intends to move away from the use of “rider” in the future. If the proposed EVCR and tariff are approved, the Company will make revisions to the EVCR to remove the term “rider” from the title of the tariff in a compliance filing. Revisions to other voluntary tariffs and the Section 14.05 Availability Matrix will be made as part of the Company’s electric rate case in Docket No. E017-GR-25-359.

### **III. OTTER TAIL POWER RESPONSES TO THE CLEAN ENERGY GROUP**

In their comments, the Clean Energy Groups comment on the importance of managed EV charging in vehicle-grid integration (VGI), expressing the value of the proposed EVCR as an option to allow customers to participate without requiring the expense of a second meter. The CEGs recommend that the Commission approve the Company’s proposed EVCR while requesting the following modifications:

- OTP expands eligibility for Level 2 EV charger rebates to *EVantage* customers. The \$500 rebate is already available to OTP customers on their Dual Fuel, Deferred Load, Fixed Time of Delivery, RDC, or Minnesota Electric Vehicle Charging Rate.
- OTP offers access to *EVantage* to customers on its whole-home TOU rate pilot. Although the cost-effectiveness calculation may be different for this customer segment, it is worth exploring how the benefits of active managed charging change within the context of TOU rates.
- OTP identifies current EV owners who are not on a managed charging rate and advertise the potential benefits to encourage *EVantage* program uptake.
- OTP explores if the technology deployed in this *EVantage* program could be harnessed in multifamily settings, as this customer segment remains without any dedicated EV offerings.

Otter Tail Power thanks the CEGs for their comments and welcomes their recommendations and questions. The Company responds to the CEG's recommendations and questions below.

**A. Level 2 EV Charger \$500 Rebate**

Upon Commission approval, the Company will extend eligibility for the Managed Level 2 EV charger \$500 rebate to *EVantage* customers in addition to eligible load management rates.

**B. Residential TOU Pilot Participation**

Otter Tail Power is not planning to offer the proposed EVCR as an option for customers participating on the residential TOU rate pilot at this time. The Company believes that the addition of direct control will require careful consideration to ensure a good experience for the customer. Without special consideration of TOU periods within the control strategy, there will be a risk of control periods occurring during an off-peak or shoulder TOU period that could shift the energy usage for a TOU customer to a more expensive period. This could unintentionally bring increased costs to a customer that would be participating concurrently on both the residential TOU pilot rate and the proposed EVCR. At this time, the Company believes that the EVCR should not be made available to customers participating on the residential TOU pilot.

### **C. Number of EV Owners With Non-Managed Charging**

Otter Tail Power has data on the total number of customer-owned electric vehicles throughout the Company's Minnesota service area provided by the Minnesota Public Utility Commission based on Minnesota vehicle registrations. However, The Company does not have the capability to identify individual EV owners from this data. The Company does not have a feasible way to identify current customer-owned EVs unless they have already participated in one of the Company's EV programs. Due to this, the Company does not find it feasible to identify and advertise to current EV owners. However, the Company will be including the EVantage offering in its future advertising plan for its Energy Conservation and Optimization (ECO) advertising portfolio.

### **D. Feasibility of EVantage Offered to Multifamily**

The EVCR proposed is targeted at residential single-family settings. Multifamily residents can participate if their parking location has separate metering that is tied to their home account. However, the Company does not believe a bill credit rate is feasible for multifamily settings with shared metering because of uncertainties that arise with a shared meter service. The incentive levels for the proposed EVCR are calculated based on expected usage in single-family settings. For multifamily settings with a shared meter, it is not feasible to know how many EVs are active at the premise with reasonable accuracy. Additionally, the scope of tracking vehicles that leave or join the rate in order to determine incentive levels would become unmanageable in the multifamily setting. In these cases, because the garage meter cost is usually paid by the property owner and incorporated into the resident's rent, it becomes difficult to allocate only the EV charging costs to individual residents. Otter Tail Power recognizes the value of creating managed EV charging programs and opportunities for multifamily housing, but for the reasons stated, the Company does not believe that the EVCR as proposed would be a good option for multifamily settings. To address this, Otter Tail Power is developing a "Commercial" Level 2 rate option that will better accommodate shared metering and provide property owners with transparent tools to pass only the charging costs to EV drivers separated from other miscellaneous usage.

Additionally, the CEGs requested further information regarding the proposed EVCR with the following questions:

- Which MISO emergency conditions will trigger longer periods of OTP control (e.g. Emergency Pricing Tier 0, EEA1, EEA2, etc.)?

- Why is a hardwired relay configuration required?
- What is the expected cost range for additional relays, if deemed necessary, a participant may have to pay for participation in this program?
- Please provide the worksheets containing the calculations for the incentive levels.
- Please provide cost estimates for administration of an option for customers to opt-out of a limited number of control periods.

Otter Tail Power values the earnest interest the CEGs have taken in the proposed EVCR and can provide the following additional information in response to the presented questions.

#### **E. MISO Conditions Creating Long Periods of Control?**

Many of the Company's direct control rates are registered as Load Modifying Resources (LMRs) with the Midcontinent Independent System Operator (MISO). Upon Commission approval, the Company will include the proposed EVCR as an LMR within its existing MISO registered LMR rate portfolio, to be available for system reliability. For this purpose, longer control periods could be required during MISO Emergency Pricing – Tier II (EEA2) emergency conditions.

#### **F. Hardwired Relay is Required?**

The Company proposes the requirement of a hardwired relay to be eligible for the EVCR to ensure charging occurs through load-managed circuit(s). If a level 2 electric vehicle charger enrolled on the EVCR was not installed in a hardwired relay configuration, then there is potential for the EV charger to be moved to another, potentially unmanaged, circuit in the premise. For this reason, the Company considers hardwiring the level 2 EV charger to be a reasonable requirement to be eligible for the proposed EVCR.

#### **G. Additional Costs?**

Otter Tail Power will not require any additional costs from the customer to participate in the EVCR. Any additional equipment required will depend on the level 2 EV charger being installed and would come at the recommendation of the electrician installing the equipment. In addition to what will be required to install a level 2 EV charger on an unmanaged circuit, a typical EVCR installation will require a load-shedding relay to interrupt charging in response to the signal from the Company installed control equipment. A 60 amp load shedding relay capable of interrupting charging can cost less than \$100 in material, and the installation of

the load shedding relay will add additional labor from an electrician, likely one or two hours. These costs will be much less than the costs for putting in a secondary service. To help mitigate the costs of managed EV charging, Otter Tail Power offers a \$500 rebate for the purchase of a level 2 EV charger that is permanently installed on a managed electric service. Additionally, Otter Tail Power has an Electric Panel Upgrade rebate available through ECO programming that will cover up to \$1,000 of the electrician labor, wiring, and equipment costs for installing a level 2 EV charger on a managed electric service. With these opportunities available to customers, Otter Tail Power believes that the additional costs for an EV owner to participate in the proposed EVCR will be minimal.

#### **H. Calculation Worksheets**

The Company has included Attachment 1.xlsx, containing the calculations used to determine the incentive levels for the single EV and two EV scenarios.

#### **I. Cost Estimate for Improved Opt-Out Capability?**

As discussed above, the Company currently has the ability to issue a temporary bypass of controls for customers that request it. Due to the Company's current LMS utilizing one-way radio communications for controls, it would not be feasible to implement a customer opt-out option within the current system. Otter Tail Power is currently working on a project to replace its LMS with a new ALM system, which is expected to be completed in 2028. At this point in the ALM replacement project, the Company believes there is too much uncertainty to provide an accurate cost estimate for the implementation of an opt-out feature for EVCR customers. As always, the Company strives to offer as much flexibility as possible for customers participating in our critical load management rate options.

### **IV. CONCLUSION**

Otter Tail Power appreciates the interest, thorough reviews, and recommendations from the Department of Commerce and the Clean Energy Groups regarding the proposed Electric Vehicle Credit Rider. The Company is encouraged by the support received in these reply comments and the recognition of the potential benefits of the proposed EVCR. Otter Tail Power values the perspectives offered which have been factored into the development of the proposal. The proposed EVCR will enable another option for customers to participate in managed EV charging while reducing the cost to the customer compared to options that require a second metered service.

Otter Tail Power requests the Commission to:

1. Approve the proposed Electric Vehicle Credit Rider.
2. Approve the proposed Electrical Vehicle Credit Rider Section 14.05 Rate Schedule and the Rate Schedule updates to the Index and Sections 13.00, 14.00 reflecting the addition of this rider.
3. Approve the Company's proposal to recover the Company's investments and expenses related to the EVCR within its Energy Conservation Optimization Program.

Dated: December 4, 2025

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ JASON GRENIER

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## **CERTIFICATE OF SERVICE**

**RE: In the Matter of Otter Tail Power Company's 2023 Integrated  
Distribution Plan  
Docket No. E017/M-23-380**

I, Khris Ekstrom, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman 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's  
Reply Comments**

Dated this **4th** day of **December, 2025**.

/s/ KHRIS EKSTROM  
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Regulatory Filing Coordinator  
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74	David	Niles	david.niles@avantenergy.com	Minnesota Municipal Power Agency		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
75	Sephra	Ninow	sephra.ninow@energycenter.org	Center for Sustainable Energy		426 17th Street, Suite 700 Oakland CA, 94612 United States	Electronic Service		No	23-380Official 23-380
76	Rolf	Nordstrom	rnordstrom@gpisd.net	Great Plains Institute		2801 21ST AVE S STE 220 Minneapolis MN, 55407- 1229 United States	Electronic Service		No	23-380Official 23-380
77	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406- 0351 United States	Electronic Service		No	23-380Official 23-380
78	David	O'Brien	david.obrien@navigant.com	Navigant Consulting		77 South Bedford St Ste 400 Burlington MA, 01803 United States	Electronic Service		No	23-380Official 23-380
79	Jeff	O'Neill	jeff.oneill@ci.monticello.mn.us	City of Monticello		505 Walnut Street Suite 1 Monticello MN, 55362 United States	Electronic Service		No	23-380Official 23-380
80	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-380Official 23-380
81	Russell	Olson	rolson@hcpd.com	Heartland Consumers Power District		PO Box 248 Madison SD, 57042-0248 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
82	Dan	Patry	dpatry@sunedison.com	SunEdison		600 Clipper Drive Belmont CA, 94002 United States	Electronic Service		No	23-380Official 23-380
83	Jeffrey C	Paulson	jeff.jcplaw@comcast.net	Paulson Law Office, Ltd.		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-380Official 23-380
84	Jennifer	Peterson	jjpeterson@mnpower.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-380Official 23-380
85	Hannah	Polikov	hpolikov@aee.net	Advanced Energy Economy Institute		1000 Vermont Ave, Third Floor Washington DC, 20005 United States	Electronic Service		No	23-380Official 23-380
86	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-380Official 23-380
87	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-380Official 23-380
88	John C.	Reinhardt		Laura A. Reinhardt		3552 26th Ave S Minneapolis MN, 55406 United States	Paper Service		No	23-380Official 23-380
89	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		Yes	23-380Official 23-380
90	Kevin	Reuther	kreuther@mncenter.org	MN Center for Environmental Advocacy		26 E Exchange St, Ste 206 St. Paul MN, 55101-1667 United States	Electronic Service		No	23-380Official 23-380
91	Michael	Riewer	mriewer@otpc.com	Otter Tail Power Company		PO Box 4496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	23-380Official 23-380
92	Noah	Roberts	nroberts@cleanpower.org	Energy Storage Association		1155 15th St NW, Ste 500 Washington DC, 20005 United States	Electronic Service		No	23-380Official 23-380
93	Robert K.	Sahr	bsahr@eastriver.coop	East River Electric Power Cooperative		P.O. Box 227 Madison SD, 57042 United States	Electronic Service		No	23-380Official 23-380
94	Elena	Saxonhouse	elena.saxonhouse@sierraclub.org	Sierra Club Environmental Law Program		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
95	Kay	Schraeder	kschraeder@minnkota.com	Minnkota Power		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-380Official 23-380
96	Dean	Sedgwick	sedgwick@itascapower.com	Itasca Power Company		PO Box 455 Spring Lake MN, 56680 United States	Electronic Service		No	23-380Official 23-380
97	Maria	Seidler	maria.seidler@dom.com	Dominion Energy Technology		120 Tredegar Street Richmond VA, 23219 United States	Electronic Service		No	23-380Official 23-380
98	Patricia	Sharkey	psharkey@environmentallawcounsel.com	Midwest Cogeneration Association.		180 N LaSalle St Ste 3700 Chicago IL, 60601 United States	Electronic Service		No	23-380Official 23-380
99	Doug	Shoemaker	dougs@charter.net	Minnesota Renewable Energy		2928 5th Ave S Minneapolis MN, 55408 United States	Electronic Service		No	23-380Official 23-380
100	Anne	Smart	anne.smart@chargepoint.com	ChargePoint, Inc.		254 E Hacienda Ave Campbell CA, 95008 United States	Electronic Service		No	23-380Official 23-380
101	Joshua	Smith	joshua.smith@sierraclub.org			85 Second St FL 2 San Francisco CA, 94105 United States	Electronic Service		No	23-380Official 23-380
102	Ken	Smith	ken.smith@ever-greenenergy.com	Ever Green Energy		305 Saint Peter St Saint Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
103	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-380Official 23-380
104	Trevor	Smith	trevor.smith@avantenergy.com	Avant Energy, Inc.		220 South Sixth Street Suite 1300 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
105	Beth	Soholt	bsoholt@cleangridalliance.org	Clean Grid Alliance		570 Asbury Street Suite 201 St. Paul MN, 55104 United States	Electronic Service		No	23-380Official 23-380
106	Sky	Stanfield	stanfield@smwlaw.com	Shute, Mihaly & Weinberger		396 Hayes Street San Francisco CA, 94102 United States	Electronic Service		No	23-380Official 23-380
107	Byron E.	Starns	byron.starns@stinson.com	STINSON LLP		50 S 6th St Ste 2600 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
108	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-380Official 23-380
109	Dean	Taylor	dtaylor@pluginamerica.org	Plug In America		6380 Wilshire Blvd, Suite 1000	Electronic Service		No	23-380Official 23-380

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Los Angeles CA, 90048 United States				
110	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		Yes	23-380Official 23-380
111	Jason	Topp	jason.topp@lumen.com	Qwest Communications Company, LLC.		200 S 5th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23-380Official 23-380
112	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	23-380Official 23-380
113	Stacy	Wahlund	swahlund@otpc.com	Otter Tail Power Company		215 S. Cascade St Fergus Falls MN, 56537 United States	Electronic Service		No	23-380Official 23-380
114	Roger	Warehime	roger.warehime@owatonnautilities.com	Owatonna Municipal Public Utilities - Gas		208 S Walnut Ave PO BOX 800 Owatonna MN, 55060 United States	Electronic Service		No	23-380Official 23-380
115	Jenna	Warmuth	jwarmuth@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	23-380Official 23-380
116	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-380Official 23-380
117	Christopher	Zibart	czibart@atcllc.com	American Transmission Company LLC		W234 N2000 Ridgeview Pkwy Court Waukesha WI, 53188-1022 United States	Electronic Service		No	23-380Official 23-380
118	Kurt	Zimmerman	kwz@ibew160.org	Local Union #160, IBEW		2909 Anthony Ln St Anthony Village MN, 55418-3238 United States	Electronic Service		No	23-380Official 23-380