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July 7, 2017

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

**PUBLIC DOCUMENT – NOT PUBLIC
DATA HAS BEEN EXCISED**

**RE: In the Matter of Otter Tail Power Company’s Petition for Approval of the Merricourt
Wind Project - Docket No. E017/M-17-279
Reply Comments**

Dear Mr. Wolf:

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

Portions of the enclosed document contain information protected by the Minnesota Data Practices Act. This information is marked as “Not Public Data” or “Protected Data” and includes pricing and contract terms, as well as information that if combined with public information in this docket could negatively impact future contract negotiations, potentially increasing costs for our customers. This information 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 efforts by Otter Tail to protect the information from public disclosure. Otter Tail maintains this information as a trade secret based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. For this reason, we ask that the data be treated as non-public data pursuant to Minn. Stat. § 13.37, subd. 1(b).

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed. If you have any questions regarding this filing, please contact me at 218-739-8956 or at cstephenson@otpc.com

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson,
Associate General Counsel

kaw
Enclosures
By electronic filing
c: Service List

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Nancy Lange	Chair
Dan Lipschultz	Commissioner
Matt Schuerger	Commissioner
Katie Sieben	Commissioner
John Tuma	Commissioner

**In The Matter of Otter Tail
Power Company's Petition
For Approval of Merricourt Wind Project**

Docket No. E017/M-17-279

REPLY COMMENTS

I. INTRODUCTION

Otter Tail Power Company, (Otter Tail) respectfully submits the following Reply Comments in the above-referenced matter. On April 11, 2017, Otter Tail filed a Petition for Approval of the Merricourt Wind Project (Merricourt Project or Project) seeking: (i) approval of an investment in 150 megawatts (MW) of wind generation to be constructed in McIntosh and Dickey Counties, North Dakota; (ii) determination that the Merricourt Project is qualified for application towards Otter Tail's renewable energy objective (REO) and renewable energy standard (RES) obligations; and (iii) authorization of future cost recovery for the Merricourt Project through Otter Tail's Renewable Resources Cost Recovery Rider (Renewable Rider), subject to Commission review and approval of specific costs to be presented by Otter Tail in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

On June 19, 2017, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments and its analysis of the Merricourt Project. Otter Tail appreciates the Department's thoughtful and thorough review. The Department concluded that the proposed Merricourt Project appears to be prudent and qualified for cost recovery under Minn. Stat. § 216B.1645, subd. 2a. The Department also noted the following:

The Department requests that OTP in reply comments (1) request approval of this petition pursuant to Minn. Stat. §216B.50; and (2) provide information to comply with, or justify any requested variance to, Minn. Rule 7825.1800 - *Filing Requirements for Petitions to Acquire Property*, or (3) explain the differentiation between each of the other petitions with more recent utility transactions (listed above) wherein the Commission applied Minn. Stat. §216B.50 with the proposed Merricourt Project's agreements and support why Minn. Stat. §216B.50 is not applicable to the Merricourt Project.

The Department also requests that OTP in reply comments explain potential consequences and environmental cost risks to ratepayers for the proposed Merricourt Project and its operation absent having an incidental take permit or habitat conservation plan with the USFWS.

The Department will submit its final recommendations after review of OTP's reply comments. However, should the Department's final recommendation support approval of the proposed Merricourt Project, the Department expects to also recommend that the Commission:

- direct OTP in its future rider recovery petition, to adjust the total capital costs by removing the internal capitalized costs when determining the return on, and the recoverable capital through, the renewable rider mechanism;
- cap the capital costs recoverable through a rider to the estimated Merricourt Project's total capital cost, adjusted by adding the allowance for funds used during construction (AFUDC) that accrued prior to the onset of rider recovery, and removing OTP's capitalized internal costs; and
- direct that any capital cost overruns omitted from rider recovery should not be treated as deferred amounts for future rate recovery.

These Reply Comments address (1) whether the Merricourt Project is exempt from Minn. Stat. § 216B.50, and Otter Tail's request for approval under the statute should the Commission determine the statute applies, (2) steps taken to address avian issues, and (3) the Department's recommendations concerning a "soft" cap on rider recovery and that capital cost overruns be denied deferred accounting treatment.

II. APPLICABILITY OF MINN. STAT. § 216B.50 TO THE MERRICOURT PROJECT

Minn. Stat. § 216B.50 Subdivision 1 provides the following:

Subdivision 1. Commission approval required.

No public utility shall sell, acquire, lease, or rent any plant as an operating unit or system in this state for a total consideration in excess of \$100,000, or merge or consolidate with another public utility or transmission company operating in this

state, without first being authorized so to do by the commission. Upon the filing of an application for the approval and consent of the commission, the commission shall investigate, with or without public hearing. The commission shall hold a public hearing, upon such notice as the commission may require. If the commission finds that the proposed action is consistent with the public interest, it shall give its consent and approval by order in writing. In reaching its determination, the commission shall take into consideration the reasonable value of the property, plant, or securities to be acquired or disposed of, or merged and consolidated.

This section does not apply to the purchase of property to replace or add to the plant of the public utility by construction.

(Emphasis added)

Otter Tail recognizes that the Commission has applied Minn. Stat. § 216B.50 to plant sales and acquisitions outside of Minnesota. Otter Tail also recognizes the Commission's December 13, 2013 Order in Dockets E-002/M-13-603 and E-002/M-13-716 regarding the applicability of the statute to Xcel Energy's Border Winds and Pleasant Valley projects. The factors, taken together, reasonably raise the question whether the statute applies to the Merricourt Project. In Otter Tail's view, applying Minn. Stat. § 216B.50 to the Merricourt Project does not give effect to the statutory exception for "the purchase of property to replace or add to the plant of the public utility by construction." The failure to give effective to the exception could lead to an overly expansive and unnecessary application of the statute to many utility construction projects.

Xcel Energy has distinguished between "Self-Build" projects and "Build-Own-Transfer" projects under Minn. Stat. § 216B.50.¹ For its Self-Build projects, Xcel recently requested approval under Minn. Stat. § 216B.50, but noted the following:

We note here that the final sentence of Minn. Stat. 216B.50 states that "This section does not apply to the purchase of property to replace or add to the plant of the public utility by construction." We believe this sentence may lead the Commission to conclude that Minn. Stat. 216B.50 does not apply to the Company's Self-Build projects (i.e., the Freeborn, Foxtail, Blazing Star I, and Blazing Star II projects).²

Otter Tail also believes that the Merricourt Project's transaction structure is consistent with Self-Build projects that may be excluded from Minn. Stat. § 216B.50. The Merricourt Project

¹ *In The Matter of the Petition of Xcel Energy for Approval of the Acquisition of Wind Generation from the Company's 2016-2030 Integrated Resource Plan*, Docket No. E002/M-16-777, Reply Comments, May 15, 2017

² Id at p. 3, footnote 1.

consists of two primary agreements between Otter Tail and EDF: (1) an asset purchase agreement (APA) and (2) a turnkey engineering, procurement, and construction agreement (TEPC). Under the APA, Otter Tail will buy the development assets of the Merricourt Project from EDF assuming certain conditions are satisfied. These assets include permits, land and land rights, and the wind turbines acquired by EDF to satisfy the 5 percent safe harbor for production tax credit eligibility. These unintegrated, un-energized components do not constitute “plant as an operating unit or system” under a plain reading of the statute. This is true whether the assets are viewed individually or in the aggregate.

After Otter Tail closes on the development asset purchase under the APA, the transaction structure is akin to a Self-Build: Otter Tail will own land rights and permits and has hired a contractor to construct and energize the Merricourt Project. Under the TEPC, Otter Tail engages EDF’s contractor affiliate – similar to other EPC contractors - to construct and erect a wind generation facility on behalf of Otter Tail. TEPC costs include EDF’s provision of the balance of the turbines, balance of plant construction, the collector substation, and the O&M building. The phrase “turnkey” in this context refers to the scope of work and the allocation of risk, not an agreement to purchase a windfarm. Otter Tail will be adding to its plant by construction, for which it has engaged EDF. This structure allows Otter Tail to allocate significant risk to EDF to the ultimate benefit of Otter Tail’s customers. Like other construction-related agreements, Otter Tail will be making progress payments under the TEPC during the course of construction, based on project milestones, which is consistent with the exception for “the purchase of property to replace or add to the plant of the public utility by construction.” To conclude otherwise could require the application of Minn. Stat. § 216B.50 to most if not all design-build arrangements involving a regulated utility and make unclear which construction projects are exempt from the statute’s reach.

III. REQUEST FOR APPROVAL UNDER MINN. STAT. § 216B.50 & REQUEST FOR VARIANCE TO MINN. RULE 7825.1800(B).

In the event the Commission determines that Minn. Stat. § 216B.50 applies to the Merricourt Project, Otter Tail respectfully requests that the Commission (1) approve the Merricourt Project as being consistent with the public interest and (2) grant Otter Tail a variance from the filing

requirements outlined in Minn. Rule 7825.1800(B), which incorporates by reference Minn. Rule 7825.1400 (A)-(J).³

Otter Tail's request for a variance is governed by Minn. Rule 7829.3200:

7829.3200 OTHER VARIANCES.

Subpart 1. **When granted.** The commission shall grant a variance to its rules when it determines that the following requirements are met:

A. enforcement of the rule would impose an excessive burden upon the applicant or others affected by the rule;

B. granting the variance would not adversely affect the public interest; and

C. granting the variance would not conflict with standards imposed by law.

Subp. 2. **Conditions.** A variance may be granted contingent upon compliance with conditions imposed by the commission.

Subp. 3. **Duration.** Unless the commission orders otherwise, variances automatically expire in one year. They may be revoked sooner due to changes in circumstances or due to failure to comply with requirements imposed as a condition of receiving a variance.

A variance from the requirements of in Minn. Rule 7825.1800(B) is well justified. The Merricourt Project's details, including its pricing, assets and property, are set forth in Otter Tail's initial filing. At this time Otter Tail anticipates financing the Merricourt Project with some combination of unsecured debt, internal cash generation and an equity infusion from its parent

³ Minn. Rule 7825.1800(B) requires petitions for approval to acquire property to contain "all information as required in part 7825.1400, items A to J; the agreed upon purchase price and the terms for payment and other considerations." Items A-J of Minn. Rule 7825.1400 are as follows:

A. A descriptive title.

B. A table of contents.

C. The exact name of the petitioner and address of its principal business office.

D. Name, address, and telephone number of the person authorized to receive notices and communications with respect to the petition.

E. A verified statement by a responsible officer of the petitioner attesting to the accuracy and completeness of the enclosed information.

F. The purpose for which the securities are to be issued.

G. Copies of resolutions by the directors authorizing the petition for the issue or assumption of liability in respect to which the petition is made; and if approval of stockholders has been obtained, copies of the resolution of the stockholders shall be furnished.

H. A statement as to whether, at the time of filing of the petition, the petitioner knows of any person who is an "affiliated interest" within the meaning of Minnesota Statutes, section 216B.48, subdivision 1, who has received or is entitled to receive a fee for services in connection with the negotiations or consummation of the issuance of the securities, or for services in securing underwriters, sellers, or purchasers of the securities.

I. A signed copy of the opinion of counsel in respect to the legality of the issue or assumption of liability.

J. A balance sheet dated no earlier than six months prior to the date of the petition together with an income statement and statement of changes in financial position covering the 12 months then ended. When the petitions include long-term securities, such statements shall show the effects of the issuance on such balance sheet and income statement.

company Otter Tail Corporation.⁴ The precise mix of financing has not yet been determined, and Otter Tail's plans are subject to change depending on other planned capital expenditures, internal cash generation, and market conditions.

Compliance with Minn. R. 7825.1400 (A)-(J) would also impose an excessive burden on Otter Tail and provide little if any useful information beyond what Otter Tail has already provided in its initial filing. Finally, a variance in these circumstances is not at odds with any statutory provisions or prejudicial to any parties or interested persons.

Based on the foregoing, Otter Tail respectfully requests that the Commission determine that the Merricourt Project is in the public interest under Minn. Stat. § 216B.50 and grant Otter Tail a variance from the filing requirements outlined in Minn. Rule 7825.1800(B).

IV. AVIAN ISSUES

It is not possible to wholly eliminate the potential consequences and environmental cost risks from avian issues at Merricourt or any other wind farm. However, by contractually requiring EDF to adopt a Bird and Bat Conservation Strategy (BBCS) incorporating elements of the U.S. Fish & Wildlife Service's (USFWS) Land-Based Wind Energy Guidelines and the Programmatic Environmental Impact Statement jointly developed by USFWS and the Western Area Power Administration (WAPA), and making plans to fully implement the measures at the Merricourt project site, Otter Tail is adopting a conservative and prudent approach designed to minimize such risks. Indeed, adoption of the draft BBCS will render the prospect of a take insignificant or discountable.

It is important to note that acquiring an incidental take permit (ITP), which requires applicants to first prepare a Habitat Conservation Plan (HCP), likewise does not wholly eliminate such risks. Obtaining an ITP is a time-consuming and expensive proposition. It authorizes the permit holder only to "take" up to a specified number of specified species. The taking of a greater number of the specified species or the taking of a different protected species would nevertheless

⁴ Otter Tail Power Company is wholly-owned by Otter Tail Corporation. Otter Tail Power Company does not issue its own equity securities. Otter Tail Power Company's equity financing is in the form of equity infusions from its parent company. From time to time Otter Tail Corporation raises capital through sales of common shares. As indicated in Otter Tail's capital expenditures plans are referenced in its most recent petition seeking approval of its capital structure, *In the Matter of Otter Tail Power Company – 2017 Capital Structure and Permission to Issue Securities*, Docket No. E017/S-17-33.

Table 1

Category	Cost Estimate
APA Costs	\$34.7 million
TEPC Costs	\$200.5 million
Otter Tail Direct Costs	[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]
Total	[PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS]

Generator interconnection costs (a/k/a transmission cost) make up most of Otter Tail’s estimated direct costs. These costs, which are determined by MISO and beyond Otter Tail’s control, cannot be estimated with precision at this time. The generator interconnection request is still in the study phases at MISO⁸.

Otter Tail currently estimates transmission costs of [PROTECTED DATA BEGINS...
...PROTECTED DATA ENDS], of which Otter Tail is responsible for [PROTECTED DATA BEGINS...
...PROTECTED DATA ENDS] with EDF responsible for [PROTECTED DATA BEGINS...
...PROTECTED DATA ENDS] under the cost sharing provisions of the APA. Otter Tail’s estimated transmission costs fall in the mid-range of estimated transmission costs of [PROTECTED DATA BEGINS...
...PROTECTED DATA ENDS], depending on the amounts of prior-queued generation projects actually constructed.

As noted by the Department, Otter Tail has reasonably addressed interconnection cost uncertainty through negotiated contractual provisions with EDF.⁹ This includes contractual interconnection cost sharing mechanisms and a contract provision where the APA automatically terminates if the interconnection costs are greater than [PROTECTED DATA BEGINS...

⁸ The Merricourt Project will interconnect to Montana-Dakota Utilities Company’s Merricourt 230 kV substation located approximately 13 miles southwest of Kulm, North Dakota. Otter Tail expects MISO’s first estimate of transmission costs for the August 2016 study group in October or November of 2017. Otter Tail currently estimates that studies for the August 2016 study group will begin in the summer of 2017 with initial identification of necessary network upgrades to interconnect the Project becoming available in late fall of 2017.

⁹ Minnesota Department of Commerce, Division of Energy Resources Comments, June 19, 2017, p. 11.

...**PROTECTED DATA ENDS**], unless one of the parties provides notice that it will pay the exceedance. It must also be noted that the Merricourt Project will remain prudent at an amount greater than the Project's current capital budget. Otter Tail's analysis of the Merricourt Project included different capital sensitivities that indicate developing the Project remains prudent even at a capital cost of **[PROTECTED DATA BEGINS...** ¹⁰ **...PROTECTED DATA ENDS]**.

Under the circumstances it is not reasonable to (1) cap Renewable Rider recovery based on the Merricourt Project capital budget of **[PROTECTED DATA BEGINS...** **...PROTECTED DATA ENDS]**, and (2) pre-emptively deny Otter Tail deferred accounting status for amounts in excess of such a cap. Interconnection costs are not within Otter Tail's control and all generators now seeking interconnection face similar uncertainty by virtue of the amount of generation currently in MISO's que. Otter Tail constructed several layers of customer protection from excessive interconnection costs, which the Department deemed reasonable. The Department's intent to hold utilities accountable for accurate capital budget estimates is not promoted in this situation. To the contrary, the Department's cap recommendation may incent utilities to adopt the high end of the ranges for highly variable and unpredictable expenses like interconnection costs. The Department's concern about Commission issuance of a blank check is also misplaced. Otter Tail's recovery of costs through its Renewable Rider is subject to Commission review and approval for specific costs presented in a future petition under Minn. Stat. §216B.1645, subd. 2a. The Department and the Commission will have full opportunity to review all costs at that time. Implementation of a cap in this docket is both premature and unnecessary.

The Department's recommendation for a cap set at **[PROTECTED DATA BEGINS...** **...PROTECTED DATA ENDS]** artificially limits Otter Tail's Renewable Rider recovery to an amount that may be less than the amount necessary "to recover prudently incurred investments, expenses, or costs associated with facilities constructed, owned, or operated by a utility."¹¹ The cap in this instance is inconsistent with the rider recovery mechanism authorized under Minn. Stat. 216B.1645.

¹⁰ See Otter Tail's Petition for Approval of the Merricourt Wind Project, April 11, 2017, p. 9.

¹¹ Minn. Stat. § 216B.1645 Subd. 2a.

While Otter Tail does not believe the Commission should adopt a cap on rider recovery in this proceeding, should the Commission be inclined to do so, Otter Tail believes a more appropriate soft cap is [PROTECTED DATA BEGINS... ..PROTECTED DATA ENDS]. A lower figure risks denying Otter Tail Renewable Rider recovery for least-cost, prudent investments that also address Minnesota's REO and RES policy objectives.

Finally, it is premature to deny Otter Tail deferred accounting treatment of expenses above a soft cap. Any decision on the deferred accounting treatment of Merricourt Project expenses in excess of a Commission-approved cap should be informed by the nature of the expenses. This information should be evaluated when Otter Tail seeks recovery through its Renewable Rider.

VI. CONCLUSION

The Merricourt Project is a prudent generation addition. The Project aligns with Otter Tail's Baseload Diversification Study¹², and 2013 and 2016 Integrated Resource Plans.¹³ The Merricourt Project is a least-cost generation resource that will assist Otter Tail in meeting its customers' energy needs. The Project also aligns with Minnesota's REO and RES policy objectives. Based on the foregoing, Otter Tail respectfully requests the Commission:

- (i) approve Otter Tail's investment in the Merricourt Project;
- (ii) determine that the Merricourt Project is qualified for application towards Otter Tail's REO and RES obligations; and
- (iii) authorize future cost recovery for the Merricourt Project through Otter Tail's Renewable Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail in a future petition under Minn. Stat. §216B.1645, subd. 2a.

¹² *In the Matter of Otter Tail Power Company's 2011-2025 Resource Plan*, Docket No. E017/RP-10-623.

¹³ *In the Matter of Otter Tail Power Company's 2014-2028 Resource Plan*, Docket No. E-017/RP-13-961; *In the Matter of Otter Tail Power Company's Submittal of its 2017-2031 Resource Plan*, Docket No. E017/RP-16-386.

Dated: July 7, 2017

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ CARY STEPHENSON

Cary Stephenson

Associate General Counsel

Otter Tail Power Company

215 South Cascade Street

Fergus Falls, MN 56538-0496

218-739-8956

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the
Merricourt Wind Project
Docket No. E017/M-17-279**

I, Kim Ward, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Reply Comments**

Dated this **7th** day of **July, 2017**.

/s/ Kim Ward
Kim Ward, Regulatory Filing Coordinator
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