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August 29, 2019



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

**RE: In the Matter of Otter Tail Power Company's 2017-2031 Resource Plan
Docket No. E017/RP-16-386
Extension Request**

Dear Mr. Wolf:

By this letter, Otter Tail Power Company (Otter Tail, OTP or the Company) respectfully requests an extension for filing its next Resource Plan, from June 1, 2020 to September 1, 2021. The Commission issued its last Order approving Otter Tail's resource plan on April 26, 2017, in this docket ("Last Resource Plan Approval"). On December 13, 2018, the Minnesota Public Utilities Commission (Commission) granted an extension for Otter Tail's next resource plan filing from June 3, 2019 to June 1, 2020.

Otter Tail is currently constructing the major new generation projects included in its Last Resource Plan Approval. After the addition of the 150 MW Merricourt Wind Project and the 248 MW Astoria Station Combustion Turbine in 2020/2021, the Company will have generation resources sufficient to meet its projected load through the upcoming decade. The requested extension to September 1, 2021, therefore, will not compromise Otter Tail's ability to meet its customers' resource requirements.

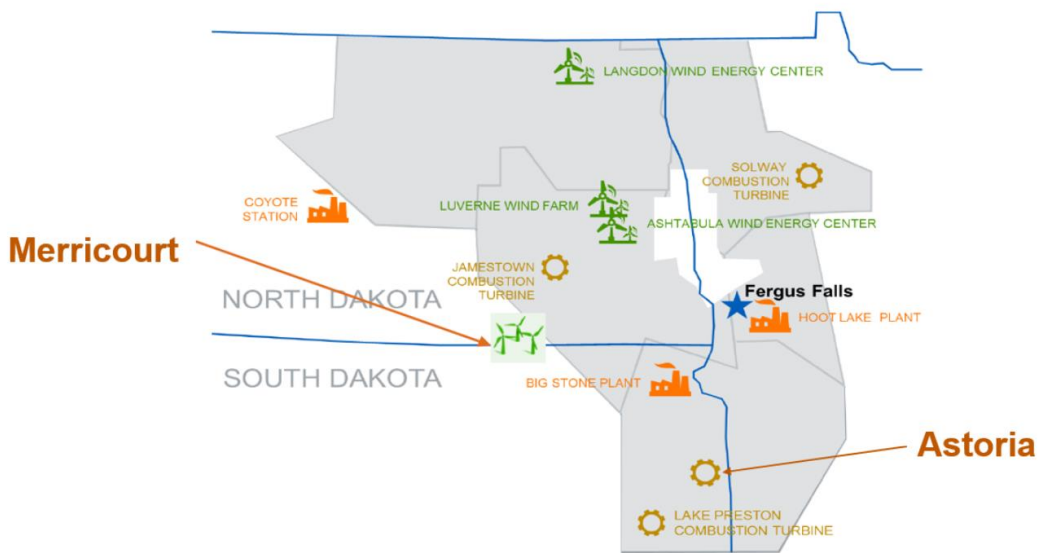
Since receiving the Last Resource Plan Approval, more information on the timeline of the State Implementation Plan process to comply with the second implementation period of the Regional Haze Rule has become available. This requested extension to September 1, 2021, will better

accommodate consideration of information that will become available through that Regional Haze Rule process.

Prior to making this request, we met with stakeholders and discussed the reasons for the request.

I. STATUS OF OTTER TAIL EXECUTION ON LAST APPROVED IRP

Otter Tail is currently constructing two major generation projects, the 150 MW Merricourt Wind Energy Center in southeast North Dakota and Astoria Station, a 245-MW simple-cycle natural gas combustion turbine in east central South Dakota. The illustration, below, shows the location of these under-construction projects in relation to Otter Tail's service territory and other generation resources.



These under-construction resources are part of Otter Tail's five-year action plan approved in the April 26, 2017 Order, in this docket, which included the following:

1. 200 MW of wind in the 2018-2020 timeframe;
2. 30 MW of solar in about 2020;
3. Up to 250 MW of peaking capacity in 2021; and
4. Average annual energy savings of 46.8 GWh (1.6 percent of retail sales).

Otter Tail continues to move forward to identify cost-effective solar resources. In addition, the Company has achieved significant average annual energy savings through its Conservation Improvement Programs.

A. Merricourt Wind Project:

The 150 MW Merricourt Wind Energy Center project is currently under construction. The project is expected to be operational in 2020.

In its most recent resource plan, the Company assumed a 40 percent capacity factor for a generic 200 MW wind project, which in turn would yield approximately 700,800 MWH annually. The actual Merricourt project, while only 150 MW, is anticipated to have a 50.7 percent capacity factor, which would yield approximately 683,280 MWH or about 97.5 percent of what the Company's Last Resource Plan Approval would have expected from a 200 MW project.

The Merricourt Wind Energy Center project is proceeding on time and on budget. The Asset Purchase Agreement (APA) between EDF Renewables Development, Inc. (f/k/a EDF Renewable Development, Inc.) (hereinafter EDF), several of its affiliates, and OTP closed July 16, 2019. Under the Project's Turnkey Engineering, Procurement and Construction Services Agreement, notice to proceed is deemed given upon closing of the APA. Estimates for the Merricourt project's interconnection costs are in-line with OTP's original expectations. Total project costs incurred by OTP through June 30, 2019 are also in-line with projections.

As to specific progress, EDF received the amended Merricourt Project site certificate in November of 2017. The North Dakota Public Service Commission (NDPSC) approved EDF and OTP's joint application for transfer of the amended Merricourt site certificate by EDF to OTP on June 26, 2019. EDF has all project easements updated and signed. EDF has also executed contracts for Balance of Plant construction and long-lead time items. EDF and NDPSC Staff, along with a representative of OTP and several EDF contractors, conducted a preconstruction conference call on June 24, 2019. In December 2016, EDF purchased the 5 percent safe harbor turbines necessary to avail the Merricourt Project of the 100 percent Production Tax Credit and these turbines are being stored in Colorado at a Vestas facility. As noted above, actual construction began in early August 2019 and the Company anticipates a construction completion date in 2020, with an in-service date allowing OTP to avail itself of 100 percent PTCs.

B. Astoria Station:

Otter Tail's development of Astoria Station, a simple-cycle natural gas combustion turbine project located near Astoria, South Dakota is also underway on time and on budget, with an anticipated commercial operation date for the Station of March 2021. All major permits have been obtained, including the South Dakota Energy Conversion Facility Permit for construction of the generator and

associated electric transmission and gas line facilities. Also, an Advanced Determination of Prudence (ADP) has been granted by the NDPSC. The contract award for the turbine was made to Mitsubishi Heavy Industries, with an expected commercial operation date for the Station of March 2021.



Project activities for the second quarter of 2019 focused on detailed design, equipment procurement, and the start of construction.

The chart below provides the number and type of major procurements identified for the Astoria Project, the number of active procurements, and the number of procurements for which contracts have been executed. For clarity, active procurements are those for which specifications are under development, proposals have been requested, or proposal responses are under review.

Procurement Type	Project Total	Active	Executed
Major equipment supply agreements	10	4	6
Service agreements	6	1	4
Interconnection-related agreements	6	1	5
Site utilities	4	0	4

In the second quarter of 2019, OTP entered into agreements for the supply of the Station’s generator step-up and unit auxiliary transformers, compressed air system, continuous emissions monitoring system, and field erected tanks. To date, four major equipment supply agreements remain to be awarded. One service agreement – the general work contract – is active, with the development of the bid package now underway. Procurement bids and lead times to date are within the Astoria Project’s budget and schedule.

As to construction itself, proposals were received and reviewed, and a contract was awarded, for the initial sitework and major foundations installation. This work commenced in the second quarter of 2019 and will continue until December of 2019.

The focus for the third quarter of 2019 will be the award of all remaining equipment supply agreements, oversight of awarded equipment supply agreements, and development and issuance of a request for proposal package for the remaining installation work. Construction activities will include the completion of public roads upgrade, completion of initial site grading, and the start of concrete foundations.

11/3/2017	ND ADP approved
1/30/2019	FERC Order on Generation Interconnection Agreement
5/6/2019	Start of construction
3/2/2020	Turbine delivery
10/2/2020	Mechanical completion (ready for first fire)
1Q2021	Commercial operation



Site activity with project drawing overlay on 8/15/2019

C. 30 MW of Solar:

Otter Tail is still working with various developers to identify a cost-effective solar project that would produce enough solar MWHs to meet Minnesota's Solar Energy Standard (SES) requirement. While prices have declined considerably, EnCompass modeling still does not choose solar as part of a least-cost energy

portfolio. It is expected that a 25 MW solar project with today’s capacity factors would meet the Minnesota SES.

As a reminder, only about one-half of Otter Tail’s customers are in Minnesota. Regulators in both North Dakota and South Dakota have been unwilling to allow resources that are not part of a least-cost resource mix to be charged to customers in their states.

Otter Tail has procured enough solar renewable energy credits (SRECs) at a very low cost to satisfy the Minnesota SES for 2020 and a significant portion of 2021. It is the Company’s intention to continue to purchase SRECs to meet the SES requirements through 2021 or until a cost-effective solar energy project (or projects) can be shown to be part of a least cost resource plan portfolio. SRECs continue to be available and cost-effective.

D. Energy Savings Goals: Average Annual Energy Savings of 46.8 GWh (1.6 percent or retail sales):

Otter Tail achieved annual energy savings of 4.03 percent in 2018 and is expecting to achieve over 2 percent in 2019. Both far exceed the 1.6 percent goal included in our Last Resource Plan Approval.

II. PROJECTED LOAD & CAPACITY

Load

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Forecasted Load	788.4	824.0	830.7	834.5	838.3	842.1	845.9	849.7	853.5	857.3
Net EE Reduction	2.7	6.6	10.9	15.4	20.1	25.0	29.8	34.7	39.6	44.5
Summer Peak	785.8	817.4	819.8	819.1	818.2	817.1	816.0	815.0	813.9	812.8
Coincident Peak	715.0	743.8	746.0	745.4	744.5	743.5	742.6	741.6	740.6	739.7
PRMR	772.2	803.3	805.7	805.0	804.1	803.0	802.0	800.9	799.9	798.8

Capability

	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
Coal	506	370	370	370	370	370	370	370	370	370
Natural Gas/Oil	101	344	344	344	344	344	344	344	344	344
Wind	59	82	82	82	82	82	82	82	82	82
Solar	0	0	0	0	0	0	0	0	0	0
Hydro	3	3	3	3	3	3	3	3	3	3
Purchased	60	10	10	10	10	10	10	10	10	10
Load Management	19	19	21	21	21	21	21	21	21	21
Total	747	827	829	829	829	829	829	829	829	829

Net Position	(25.1)	23.3	22.9	23.6	24.5	25.6	26.6	27.6	28.7	29.8
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The table above shows our projected PRMR (Planning Reserve Margin Requirement) and total accredited capacity for the years 2020 through 2034. We anticipate having adequate capacity reserves after the completion of our 150 MW Merricourt wind farm and our 248 MW Astoria Station natural gas

combustion turbine in the late 2020 timeframe. When looking at the PRMR calculation, the “Net EE Reduction” is the amount of demand reduction we expect to see from our 1.6 percent energy efficiency goal with a portion of that reduction assumed to already be built-in to the forecast. The final PRMR calculation assumes a 0.91 coincident factor and an 8 percent reserve margin.

Otter Tail recently purchased a new capacity expansion modeling software called EnCompass which is now our primary modeling tool and was used to create this table. The model used for this analysis is an internal model that we keep up-to-date as assumptions change, while also frequently employing a variety of studies and other external resources as well.

III. ADDRESSING REGIONAL HAZE

A. Regional Haze Rule Visibility Goals:

The Clean Air Act requires states to make reasonable progress toward natural visibility conditions in our nation’s national parks and wildernesses (Class I areas) with the goal of restoring such areas to natural visibility conditions by 2064. Baseline conditions were calculated from visibility measurements performed during 2000-2004. The EPA’s rule sets several milestones that are 10 years apart, requiring incremental progress toward the final goal. In the first implementation period of the Regional Haze Rule, Otter Tail was required to reduce emissions by applying Best Available Retrofit Technology at the Big Stone Plant, of which Otter Tail is a part owner along with two other utilities. In the second implementation period, states will focus on making reasonable progress towards the 2064 goal. The Regional Haze Rule does not explicitly address individual facilities, instead, each affected state is required to develop a State Implementation Plan (SIP) that will apply emission limitations to individual facilities as determined necessary by the state to make reasonable progress for the implementation period. Otter Tail’s only North Dakota facility expected to be affected by North Dakota’s SIP is the Coyote Station coal-fired plant near Beulah, ND, for which Otter Tail owns 35 percent. The remainder of the plant is owned by Montana-Dakota Utilities Co., NorthWestern Energy, and Northern Municipal Power Agency. At this time Otter Tail does not anticipate that any of its other facilities will be affected in the second implementation period.

B. Second Implementation Period Summary:

The Regional Haze Rule’s second implementation period covers the years 2018-2028, with State Implementation Plans (SIPs) due in July 2021.

1. If a source is selected by a state for an assessment of possible emission reduction measures for the second implementation period, the Clean Air Act lists four factors that must be taken into consideration in determining reasonable progress controls:

- Costs of compliance
- Time necessary for compliance
- Energy/non-air quality environmental impacts
- Remaining useful life of affected sources

2. The North Dakota Department of Environmental Quality requested that each addressed power plant submit a “four-factor” analysis for the second implementation period by January 31, 2019. Otter Tail, along with our Coyote Station plant partners, retained Sargent & Lundy for this four-factor analysis. Otter Tail received minor comments from the State on the initial submittal, and a revised analysis was submitted May 10, 2019.

C. The Coyote Station Plant



Age	On line since 1981	
Employees	Approximately 80	
Capacity	427 megawatts	
Air Quality Controls	<ul style="list-style-type: none"> • Dry Scrubber/Fabric Filter for SO₂ and PM Control (original to plant) • Overfire Air for NO_x control (Installed in 2016 for Regional Haze Round 1) 	
Ownership	Otter Tail Power Company	35%
	Northern Municipal Power Agency	30%
	Montana Dakota Utilities Co.	25%
	NorthWestern Energy	10%

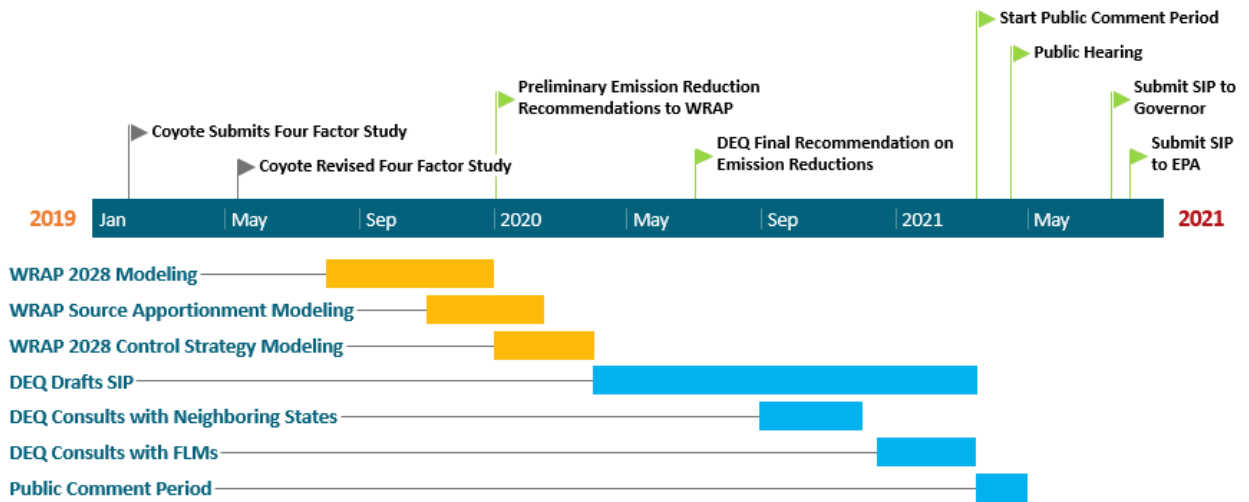
Included within Coyote’s four-factor analysis is an analysis of technically feasible sulfur dioxide (SO₂) and nitrogen oxides (NO_x) controls.

SO₂ controls capital costs are estimated to be in a range of \$0.5M - \$325M. Examples of the control options evaluated for Coyote Station include upgrades to existing equipment, adding new technology in combination with existing equipment, and installing a new scrubber. Annual operation and maintenance costs are estimated to be between \$2M - \$22M depending on the control option.

NO_x controls capital costs are estimated to be in a range of \$20M - \$25M. Only two post-combustion control options are found to be technically feasible. Annual operation and maintenance costs are estimated to be between \$3M - \$7M.

As laid out in the previous two paragraphs, both the capital costs and related operation and maintenance costs have a wide range. The ranges are expected to narrow during SIP development. Accurate information on the cost of compliance will be very important for OTP to submit a useful and instructive resource plan, and this information is expected to become available during the requested extension.

D. Timeline for Regional Haze Round 2 Implementation:



IV. OTHER BENEFITS OF CHANGING THE SCHEDULE FOR FILING AS REQUESTED

- A. Otter Tail has migrated from “Strategist” to “EnCompass” as its capacity expansion and power planning modeling software. The delay will allow both Otter Tail and the Department time to become more familiar with the new model.
- B. The Company’s modeling could take advantage of further declines and more accuracy in solar pricing.

V. STAKEHOLDER INPUT

The Company has met with all the active participants in its most recent resource plan (see list below) to discuss the merits of the Company’s extension request and to receive stakeholder input.

- Minnesota Public Utilities Commission Staff
- Minnesota Department of Commerce
- North Dakota Public Service Commission Staff
- South Dakota Public Utilities Commission Staff

- Minnesota Center for Environmental Advocacy
- Fresh Energy
- Clean Grid Alliance
- Sierra Club
- Minnesota Large Energy Consumers
- Minnesota Chamber of Commerce
- Center for Energy and the Environment
- Great Plains Institute

VI. CONCLUSION

Otter Tail is engaged in development of several projects that will address the five-year action plan approved in its most recent resource plan order and no additional IRP approvals are needed in the near term for Otter Tail to meet its resource needs.

Waiting one year to gain additional certainty around the Regional Haze Rule will provide all parties with a more useful and informed resource plan. In addition, granting the extension will also afford the Company and the Department additional time to become familiar with the new capacity expansion model. It would also spread out the workload for parties to this proceeding. More accurate pricing of solar energy could also be included. Such extension, if granted, will ultimately benefit the Commission as it evaluates Otter Tail's next resource plan. Particularly so in terms of such plan meeting the objectives set forth in Minnesota Administrative Rules, Chapter 7843.0500, Subp.3, such as addressing Otter Tail's future plans and associated costs under regulatory constraints, evaluating environmental impacts, and in best responding to continuing changes in other financial, social, and technological factors affecting OTP's operations (*e.g.*, generation and conservation plans). Otter Tail respectfully requests the Commission approve its request to delay the filing of its next resource plan from June 1, 2020 to September 1, 2021.

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 bhdraxten@otpc.com or (218) 739-8417.

Mr. Wolf
August 29, 2019
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Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

rah
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

RE: **In the Matter of Otter Tail Power Company's 2017-2031 Resource Plan
Docket No. E017/RP-16-386**

I, Rebecca Hasse, 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
Extension Request**

Dated this **29th** day of **August, 2019**.

/s/ Rebecca Hasse _____
Rebecca Hasse, Regulatory Filing Coordinator
Otter Tail Power Company
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(218) 739-8817

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