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August 29, 2025



Mr. Mike Bull
Acting Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the
Distributed Solar Energy Standard Projects
Docket No. E017/M-25-
Initial Filing**

Dear Mr. Bull:

Otter Tail Power Company (Otter Tail Power or Company) hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of investments in two distributed solar energy projects located in Otter Tail County, Minnesota: (a) the 4.85-megawatt (MW) Pelican Rapids Project and (b) the 4.2 MW Parkers Prairie Project. These projects support Otter Tail Power's compliance with the Minnesota Distributed Solar Energy Standard (DSES) under Minn. Stat. § 216B.1691 Subd 2h.

The Petition requests that the Commission determine that the Pelican Rapids and Parkers Prairie Projects are qualified for application towards Otter Tail Power's obligations under Minnesota's renewable energy objective (REO) and standards, including the DSES. The Petition also requests the Commission authorize future cost recovery for the Projects Solway through Otter Tail Power's Renewable Resources Cost Recovery Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

The Company respectfully request expedited consideration of this Petition in view of guidance from the United States Treasury Department issued on August 15, 2025 limiting the application of a five percent safe harbor used to calculate the start of construction for renewable generation projects for tax credit eligibility purposes. While the Company does not believe the new safe harbor guidance affects the proposed projects, which are to go into service in 2029 under current project timelines, the Treasury Department has signaled it intends to strictly construe prior guidance. In addition, recent federal legislation encourages procurement in the near term. Therefore, in an abundance of caution, and to help us secure the best value for our customers, the Company believes it is prudent to position these projects to qualify under the new guidance, which would require a commercial operation date of by the

end of 2027. To preserve this flexibility, we respectfully request that the Commission address this matter at hearing by the end of February 2026.

The Public version of the Petition is contemporaneously filed under a separate cover letter in this proceeding. Portions of the enclosed Petition are marked "PROTECTED DATA". This data includes confidential bid information received and evaluated by the Company's project evaluation team. Protected data also includes confidential Otter Tail Power project cost estimates, the disclosure of which could give vendors a competitive advantage as Otter Tail Power engaged in procurement efforts, all to the detriment of our customers. The protected data also includes information which if disclosed could be used to calculate projected customer energy usage data of specific customers. This information: (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) therefore is protected data under Minn. R. 7829.0100, subp. 19a(A). This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. Otter Tail Power has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA.

In compliance with Minn. R. 7829.1300, subp. 2, Otter Tail Power is serving a copy of this filing on the Minnesota Department of Commerce – Division of Energy Resources and the Minnesota Office of Attorney General – Residential Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's Power's general service list. 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

kde
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
for Distributed Solar Energy
Standard Projects**

Docket No. E017/M-25-

SUMMARY OF FILING

On August 29, 2025, Otter Tail Power Company (Otter Tail Power) submitted a Petition to the Minnesota Public Utilities Commission (Commission) for approval of investments in two distributed solar energy projects: (a) the Pelican Rapids Solar Project, a 4.85-megawatt distributed solar generation facility to be constructed near Pelican Rapids, Minnesota, and (b) the Parkers Prairie Solar Project, a 4.2-megawatt distributed a solar generation facility to be constructed near Parkers Prairie, Minnesota.

The Petition also requests that the Commission determine that the projects are qualified for application towards Otter Tail Power's obligation under Minnesota's renewable energy objective (REO) and standards, including the Distributed Solar Energy Standard (DSES).

The Petition also requests the Commission authorize future cost recovery for the Projects through Otter Tail Power's Renewable Resources Cost Recovery Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

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

**In the Matter of Otter Tail Power
Company's Petition for Approval of
the Distributed Solar Energy
Standard Projects**

**Docket No. E017/M-25-
PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power or Company) respectfully requests approval by the Minnesota Public Utilities Commission (Commission) to invest in and recover costs for two distributed solar energy projects required for the Company's compliance with Minnesota's Distributed Solar Energy Standard (DSES)¹:

- (1) The Pelican Rapids Solar Farm (Pelican Rapids Project) is a 4.55 megawatt (MW), alternating current, solar photovoltaic project expected to produce approximately 9,565 megawatt-hours (MWh) annually.
- (2) The Parkers Prairie Solar Farm (Parkers Prairie Project) is a 4.2 MW alternating current, solar photovoltaic project expected to produce approximately 8,626 MWh annually.

These projects are located in the Company's service territory in Otter Tail County, Minnesota, and support the goals of the DSES. The projects were identified and selected through the process approved by the Commission in Docket No. E002, E015, E017/CI-23-403.² The projects (DSES Projects or Projects) will utilize the latest solar technology to maximize efficiency and energy output. The DSES Projects are expected to be in commercial service by the end of 2029.

For each project, Otter Tail Power seeks a determination that (1) the project is qualified for application towards Otter Tail Power's DSES obligations,³ and (2) that costs for each project are recoverable through Otter Tail Power's Renewable Resources Cost Recovery Rider (RRCR Rider), subject to Commission review and approval of specific costs to be presented by Otter Tail Power in future petitions under Minn. Stat. § 216B.1645, subd. 2a.

¹ Minn. Stat. 216B.1691 Subd. 2h.

² *In the Matter of the Implementation of the New Distributed Solar Energy Standard Pursuant to 2023 Amendments to the Minnesota Statutes, Section 216B.1691*, Docket No. E002, E015, E017/CI-23-403.

³ This request incorporates the Commission's determination that utilities may count renewable energy credits retired for the DSES towards any other standard obligation under Minn. Stat. § 216B.1691.

The Company respectfully requests expedited review of this filing to protect the DSES Project's economic competitiveness and ensure lowest cost for customers. The request for expedited review concerns U.S. Treasury Department interpretive guidance issued on August 15, 2025, limiting the application of certain tax credit safe harbors.⁴ While the Company does not anticipate this change will affect the DSES Projects, unanticipated events could change this, requiring the Company to expedite procurement, construction and in-service dates. Expedited review is intended to maintain the availability of tax credits under multiple pathways.

II. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, subp. 1, a summary of the filing accompanies this Petition.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, subp. 3, the following information is provided.

A. Name, address, and telephone number of utility

(Minn. Rules 7829.1300, subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney

(Minn. Rules 7829.1300, subp. 3(B))

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
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⁴ The new guidance limits the application of the 5% purchase safe harbor. *See* Notice 2025-42, 2025-35 I.R.B. ____ (Aug. 15, 2025).

C. Date of filing and proposed effective date of rates

(Minn. Rules 7829.1300, subp. 3(C))

The date of this filing is August 29, 2025. No rates or changes to rates are proposed by this filing.

D. Statutes controlling schedule for processing the filing

(Minn. Rules 7829.1300, subp. 3(D))

This filing is a “miscellaneous tariff filing” as defined by Minn. Rule 7829.0100, subp. 11. No determination of Otter Tail Power’s overall revenue requirement is necessary under Minn. Stat. §§ 216B.1691 or 216B.1645. Minn. Rule, 7829.1400, subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter. The past practice of the Commission, however, is to issue a notice setting a schedule for comments and reply comments from interested parties.

E. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, subp. 3(E))

Derek Haugen
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Paula Foster
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F. Service List

(Minn. Rules 7829.0700)

Otter Tail Power requests that the following persons be placed on the Commission’s official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail Power:

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We request that all communications regarding this proceeding, including data requests, also be directed to:

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpc.com

G. Service on other parties

(Minn. Rules 7829.1300, subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, subp. 2, Otter Tail Power served a copy of this Petition on the Division of Energy Resources of the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, subp. 1 was served on all parties on Otter Tail Power's general service list.

IV. DESCRIPTION AND PURPOSE OF FILING

Otter Tail Power seeks a Commission determination that the Projects qualify towards the Company's DSES obligations, and that the Projects qualify for cost recovery through Otter Tail Power's RRCR Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in future petitions.

This Petition is authorized by Minn. Stat. §216B.1645. Subdivision 1 of that statute authorizes the Commission to “approve or disapprove power purchase contracts, investments, or expenditures entered into or made by the utility to satisfy the wind and biomass mandates contained in sections 216B.169, 216B.2423, and 216B.2424, and to satisfy the renewable energy objectives and standards set forth in section 216B.1691 . . .” Under Subdivision 2a, utilities may petition the Commission to approve a rate schedule with an automatic adjustment of charges “to recover prudently incurred investments, expenses, or costs associated with facilities constructed, owned, or operated by a utility to satisfy Minnesota’s renewable energy objectives and standards set forth in Minn. Stat. § 216B.1691.”

The Commission established Otter Tail Power’s RRCR Rider in Docket No. E017/M-08-119. Otter Tail Power seeks authority to use this vehicle to recover certain costs of the Projects as a DSES qualified resource addition, recognizing that specific project costs must be reviewed and approved in subsequent filings.

The DSES was signed into law on May 24, 2023. The legislation amended Minn. Stat. § 216B.1691 to add a distributed solar energy standard for the state’s investor-owned electric utilities. Otter Tail Power has fewer than 100,000 retail electric customers in Minnesota, so Minn. Stat. § 216B.1691 Subd. 2h. (b)(3) requires the Company to produce from solar energy generating systems at least one percent of its total retail electric sales in Minnesota, excluding sales to industrial customers. On June 26, 2024, the Commission entered its Order Clarifying Implementation of Distributed Solar Energy Standard in Docket No. E-002,E-015,E-017/CI-23-403 (DSES Order).⁵ Among other things, the DSES Order directed investor-owned utilities to file requests for proposals (RFPs) for distributed solar projects by November 1, 2024, set standards for RFPs, approved proposals for verifying prevailing wages and apprenticeship programs, and established further reporting requirements. This Petition seeks approval for Projects necessary for DSES compliance.

V. PROJECT DESCRIPTIONS

The Pelican Rapids and Parkers Prairie Projects, both located in Otter Tail County, will utilize the latest solar technology to maximize efficiency and energy output through the use of single-axis trackers, bi-facial panel modules and a hybrid string inverter arrangement. Both project sites are planned to have a DC overbuild of 130 percent to help maximum production through days with variable solar irradiance. Both Projects take advantage of land that has limited value for other uses.

⁵<https://www.edockets.state.mn.us/documents/%7BF0BF5590-0000-CD1A-A82B-6CC537DEC1F3%7D/download?contentSequence=0&rowIndex=28>.

Table 2**[PROTECTED DATA BEGINS...****...PROTECTED DATA ENDS]****C. Projected Project Schedules**

Otter Tail Power intends to build the DSES Projects contemporaneously, per the following schedule.⁶

<u>MILESTONES</u>	<u>Start</u>	<u>Finish</u>
<u>Development</u>	<u>01/06/2025</u>	<u>04/10/2025</u>
<u>Project Award / Tentative Notice to Proceed</u>	<u>05/12/2025</u>	
<u>MN Interconnection Process</u>	<u>07/25/2025</u>	<u>No later than Q4, 2029</u>
<u>Permitting, Engineering & Design</u>	<u>Q3, 2025</u>	<u>Q4, 2026</u>
<u>Construction</u>	<u>2026-2029</u>	<u>No later than Q4, 2029</u>
<u>Commissioning & Testing</u>	<u>2026-2029</u>	<u>No later than Q4, 2029</u>
<u>Proposed Commercial Operation Date (COD)</u>		<u>No later than Q4, 2029</u>

VI. INVESTMENTS IN THE DSES PROJECTS ARE REASONABLE, PRUDENT, AND ELIGIBLE FOR INCLUSION IN THE RRCR RIDER

Based on the factors discussed below, Otter Tail Power requests the Commission approve Otter Tail Power's investment in the DSES Projects and determine that these investments are eligible for RRCR Rider recovery.

⁶ This schedule assumes the continued availability of tax credit safe harbors not affected by Treasury Guidance issued August 115, 2025. See Notice 2025-42, 2025-35 I.R.B. ____ (Aug. 15, 2025). Changes in Treasury Department interpretive guidance could require an expedited schedule with the Projects in service by the end of 2027.

A. Minnesota DSES & Compliance

The Projects are necessary for Otter Tail Power’s compliance with the DSES, which requires that at least one percent of the Company’s Minnesota retail electric sales be generated from distributed solar generation by the end of 2030, excluding sales to industrial customers.⁷ The Company estimates that the DSES Projects will constitute 140 percent of Otter Tail’s DSES need based on Minnesota retail electric sales by the end of 2030. Table 3 below reflects projected DSES compliance.

Table 3

A	B	C	D	E
2030 MN Retail Electric Sales Forecast (MWh)	2030 Industrial Customers MN Retail Electric Sales Forecast (MWh)	2030 DSES MN Retail Electric Sales (MWh) ((A – B) * .01)	2030 Combined Annual DSES Solar Generation (MWh)	% of MN Retail Electric Sales
2,797,978	1,502,101	12,959	18,191	140%

The DSES Projects provide a reasonable margin of safety for DSES compliance of approximately 40 percent which will help the Company satisfy the DSES should Minnesota retail electric sales increase more than expected by 2030 and/or exempt industrial sales decrease. This margin also supports the Company’s compliance with other standard obligations under Minn. Stat. § 216B.1691, including the Carbon Free Standard.⁸

B. Selection Process

The DSES Order clarified the standards for implementation of the DSES, including standards for stakeholder involvement, RFPs, and the evaluation and selection of DSES projects, to include an independent audit of the selection process if the Company proposes its own projects.

Pursuant to the Commission’s Order, the Company engaged in a stakeholder process on September 23, 2024.⁹ On November 1, 2024 the Company filed a proposed RFP for review and affirmative checkoff by the Department of Commerce.¹⁰ On November 7, 2024, the

⁷ Minn. Stat. § 216B.1691 Subd.2h (3).

⁸ “Utilities may count renewable energy credits retired for the DSES towards any other standard obligation under Minn. Stat. § 216B.1691.” Order Clarifying Implementation of Distributed Solar Energy Standard, Order Point 11, June 26, 2025, Docket No. E-002,E-015,E-017/CI-23-4.

⁹ On September 12, 2024, Otter Tail filed a [letter](#) with the Commission notifying parties of a public stakeholder meeting discussing Otter Tail’s upcoming RFP.

¹⁰ Otter Tail Power Request from Proposals, November 1, 2024 [RFP](#).

Company filed a modified RFP based on Department input. On December 2, 2024, the Department filed a letter finding the Company's RFP to be in compliance with all requirements and granting the Department's approval.¹¹ Thereafter Otter Tail Power issued its RFP.

Summary of Projects Evaluated

Otter Tail Power received six different solar proposals with two of the proposals having battery storage options, bringing the total number of proposals evaluated to eight. Three of the eight projects were submitted by Otter Tail Power's development team, and the other five projects were submitted by other developers as reflected in the following Table 4.

Table 4

[PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS]

Final Scoring and Selection

Otter Tail Power's evaluation team (separate and distinct from the development team) reviewed and scored the projects using the following approved RFP scoring criteria:

¹¹ Department of Commerce Letter, December 2, 2024, at 8.

1. Cost – 50 points
2. Site Control – 5 points
3. Safety – 5 points
4. Viability – 15 points
5. Developer Experience – 15 points
6. Pollinator Friendly – 5 points
7. Reliability Benefits – 5 points

The evaluation team initially selected all three Otter Tail Power-owned projects, with cost being the primary differentiator. The following Table 5 provides scoring for the projects evaluated.

Table 5

[PROTECTED DATA BEGINS...

...PROTECTED DATA ENDS]

The three Otter Tail Power-owned projects were projected to produce 26,182 MWh of annual generation. This closely matched the originally calculated DSES requirement of roughly 27,000 MWh needed for compliance. The Company has since determined that only the top two scoring projects (Pelican Rapids and Parkers Prairie) are necessary and reasonable for DSES compliance. This change is attributable to a more accurate assessment of retail electric sales to industrial customers when determining Minnesota retail electric

sales.¹² **[PROTECTED DATA BEGINS...**

...PROTECTED DATA ENDS]. The updated calculations support selection and development of the top two scoring projects rather than all three projects.¹³

Because projects were submitted by Otter Tail Power's development team, the Company retained Leidos Engineering, LLC to perform an independent audit of the RFP process to ensure this process was fair and transparent. The following scope of work defined the audit:

- Assess whether the RFP documents, including Standard Bidders Forms, provide sufficient and consistent information for Bidders to prepare proposals.
- Identify any potential bias in the criteria used to evaluate bids.
- Review of RFP responses.
- Establish that the bid evaluation criteria were applied in a fair and unbiased manner.
- Assess whether a consistent and transparent methodology was used to screen and rank RFP responses.
- Identify irregularities in the RFP process.

The independent auditor's role was to evaluate the RFP and the project evaluation and selection process for any undue bias, discrimination or irregularities. The independent auditor's role was not that of an independent evaluator. The Company has informed the independent auditor that this Petition seeks approval for the top scoring two projects, rather than the top scoring three projects. The Company will file the independent auditor's report in this docket when it receives the report, which is anticipated shortly after the filing of this Petition.

C. Cost Allocations

Otter Tail Power proposes that all costs and benefits associated with the DSES Projects be allocated 100 percent to Minnesota. This allocation is consistent with the DSES's features and purpose. Unlike other obligations under Minn. Stat. 216B.1691, DSES driven projects are not part of integrated resource planning modeling. DSES projects must also be located in the Company's Minnesota service area. The small-scale solar projects are connected to the Company's distribution system in Minnesota, offering limited benefits to the Company's non-

¹² "For a public utility subject to clause (2) or (3), sales to industrial customers in Minnesota must be subtracted from the utility's total retail electric sales for the purpose of calculating total retail electric sales in Minnesota." Minn. Stat. 216B.1691 subd. 2h (b).

¹³ Although this Petition is limited to the Pelican Rapids and Parkers Paire Projects, the Company intends to maintain the Fergus Falls project in a status where it could be developed in case of unanticipated problems and costs in the selected projects.

Minnesota customers. The limited size of projects required by the DSES does not permit economies of scale associated with larger solar projects, which is reflected in substantially higher LCOEs compared to the Company's proposed utility-scale solar projects. For these reasons and others, it is reasonable to allocate the DSES Projects exclusively to Minnesota.¹⁴

VII. CONCLUSION

Based on the foregoing, Otter Tail Power respectfully requests the Commission:

- a. approve Otter Tail Power's investment in the Projects;
- b. determine that the Projects qualify for application toward Otter Tail Power's DSES obligations; and
- c. authorize future cost recovery of the Projects through the RRCCR Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

Dated: August 29, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ DEREK HAUGEN

Derek Haugen
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By: /s/ CARY STEPHENSON

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¹⁴ The DSES Projects would not satisfy a least cost analysis required by North Dakota, and the North Dakota Public Service Commission has issued an Integrated Resource Plan order declining support for *any* renewable resources until at least 2030. *See* Order and Guidance on Integrated Resource Plan, December 4, 2024, NDPSC Case No. PU-21-380. South Dakota lacks an IRP process, but the Company can reasonably assess that the South Dakota Public Utilities Commission would not authorize cost recovery for the DSES projects in view of the Projects' Minnesota policy purpose, LCOE, and limited system benefits. As a practical matter, if the Projects are not fully allocated to Minnesota the Company will be unable to proceed.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval
of the Distributed Solar Energy Standard Projects
Docket No. E017/M-25-**

I, Khris Ekstrom, hereby certify that I have this day served a copy of the following, or a summary thereof, on Mike Bull 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
Initial Filing**

Dated this **29th** day of **August, 2025**.

/s/ KHRIS EKSTROM
Khris Ekstrom
Regulatory Filing Coordinator
Otter Tail Power Company
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#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Otter Tail Power Company Renewable Resource Recovery Rider
12	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Renewable Resource Recovery Rider
13	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	Otter Tail Power Company Renewable Resource Recovery Rider
14	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		No	Otter Tail Power Company Renewable Resource Recovery Rider
15	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Renewable Resource Recovery Rider
16	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Renewable Resource Recovery Rider