215 South Cascade Street PO Box 496 Fergus Falls, Minnesota 56538-0496 218 739-8200 www.otpco.com (web site)



July 29, 2025

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 Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01 Docket No. E017/AA-25-065 Reply Comments

Dear Mr. Bull:

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

Table 1 in the Reply Comments contains (the "Protected Data"). The Protected Data 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 the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (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) is protected data under Minn. R. 7829.0100, subp. 19a(A).

If you have any questions regarding this filing, please contact me at 218-739-8282 or at <a href="mailto:cbyrnes@otpco.com">cbyrnes@otpco.com</a>.

Sincerely,

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

vjm Enclosures By electronic filing c: Service List



## STATE OF MINNESOTA BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01 Docket No. E017/AA-25-065

**REPLY COMMENTS** 

#### I. INTRODUCTION

On May 1, 2025, Otter Tail Power Company (Otter Tail Power or the Company) petitioned the Minnesota Public Utilities Commission (Commission) for approval of its 2026 forecasted Energy Adjustment Rider (EAR) rates (May 2025 Filing) in response to decisions rendered by the Commission in Docket No. E999/CI-03-802 and where applicable, in compliance with annual reporting requirements pursuant to Minn. R. 7825.2800 to 7825.2840 governing Automatic Adjustment of Charges and prior Otter Tail Fuel Clause Adjustment (FCA) forecast dockets.

On June 30, 2025, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments in the above captioned docket without recommending the Commission approve Otter Tail Power's proposed 2026 net system FCA costs and associated rates until the Company provides additional information in these reply comments. .

Otter Tail Power's "refresh" of its 2026 FCA forecast and associated rates for 2026 did not produce a material change of more than five percent; therefore, Otter Tail Power will continue to use its May 2025 filing forecast. Otter Tail Power will keep the Commission informed if forward market energy prices are suspected to have a significant impact on the Company's 2026 forecast and associated rates.

#### II. OTTER TAIL RESPONSES

Otter Tail Power provides responses to the following items raised by the Department in its Comments filed on June 30, 2025:

A. The Department recommends the Company explain in reply comments the difference between the sales forecast on Attachment 2 and on Attachment 6, and why the higher Minnesota sales forecasts on Attachment 6 is not used for calculating the Minnesota 2026 forecasted EAR rates.

The kWh Otter Tail Power included in Attachment 2 of the initial filing of the Petition were incorrect, whereas the kWh in Attachment 6 in the initial Petition were correct. The updated Attachments 1 and 2 are included as an attachment to these reply comments. The updated annual forecasted cost per kWh for 2026 is \$0.02783/kWh. Otter Tail Power appreciates the Department identifying this oversight.

B. The Department requests that the Company provide significant supporting documentation in their future 2026 true-up filing for their 2026 purchase power costs in order to ensure rate recovery of these costs.

Otter Tail Power will provide to the best of its ability supporting documentation in the 2026 True-Up filing in this Docket and will work with the Department to develop these future reporting requirements.

C. The Department asks Otter Tail to address in reply comments if the 2022 asset-based sales for 2022 should be a credit of (\$146.05) on per MWh basis. Second, the Department asks Otter Tail to address in reply comments if the 2022 to 2024 three-year average asset-based sales should be a credit of \$93.63 on per MWh basis, not the \$0.08 noted above. Third, the Department asks Otter Tail to address in reply comments why the MWh for asset-based sales are forecasted to be significantly lower for 2026.

As Otter Tail Power identified in IR MN-DOC-007 in this filing, the 2022 Asset-Based Sales should be a credit of (\$146.05) per MWh, and the three-year average of Asset-Based Sales from 2022 to 2024 should be a credit of (\$97.29) per MWh. The forecasted MWh for Asset-Based Sales are lower for 2026 due to the removal of Coyote Station's MWh from Asset-Based Sales beginning in June 2026.

# D. The Department requests Otter Tail provide in reply comments the PRA auction revenues for the 2025/2026 planning year, including the related MWhs and all supporting information and calculations.

The MISO 2025/2026 Planning Resource Auction (PRA) costs and revenues results for Otter Tail Power (Total Company) are shown in Table 1 below:

Table 1 2025-2026 MISO PRA Results

|                                      | Summer                 | Fall     | Winter   | Spring       |  |  |  |  |  |  |
|--------------------------------------|------------------------|----------|----------|--------------|--|--|--|--|--|--|
| 25/26 PRA Clearing Price (\$/MW-day) | \$ 666.50              | \$ 91.60 | \$ 33.20 | \$ 69.88     |  |  |  |  |  |  |
|                                      | [PROTECTED DATA BEGINS |          |          |              |  |  |  |  |  |  |
| Capacity Cleared (MW)                |                        |          |          |              |  |  |  |  |  |  |
| PRMP (MW)                            |                        |          |          |              |  |  |  |  |  |  |
| Capacity Excess / (Shortage) (MW)    |                        |          |          |              |  |  |  |  |  |  |
| Excess Capacity Revenue / (Cost)     |                        |          |          |              |  |  |  |  |  |  |
|                                      | PROTECTED DATA ENDS]   |          |          |              |  |  |  |  |  |  |
|                                      |                        |          | Total    | \$ 8,557,948 |  |  |  |  |  |  |

On July 28, 2025, Otter Tail Power submitted a supplemental filing in Docket No. E017/AA-24-065 to return a \$5.4 million over-collection that occurred between January and June 2025, which includes \$0.8 million (Minnesota share) of net PRA revenues.

To avoid abrupt changes in customer bills, Otter Tail Power plans to pass the remaining PRA revenues net of costs to customers through additional filings:

- A second filing is anticipated to pass the July through October 2025 portion of PRA net revenues to customers, with a rate credit issued from January through August 2026.
- The final November through December 2025 portion will be included in the March 2026 True-Up filing, also in Docket No. E017/AA-24-065.

This phased approach helps ensure a more stable and predictable rate environment for customers by distributing refunds over time.

#### III. REQUEST

Otter Tail Power appreciates the Department's thorough and thoughtful analysis of its May 2025 Filing. No material changes have occurred that warrant updating Otter Tail's forecasted rates for 2026. Otter Tail Power respectfully requests the Commission approve the Company's 2026 FCA forecast and associated rates submitted in its May 2025 filing.

Dated: July 29, 2025

Respectfully submitted,
OTTER TAIL POWER COMPANY

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

#### OTTER TAIL POWER COMPANY ELECTRIC UTILITY - STATE OF MINNESOTA 2026 PROPOSED FORECASTED EAR RATES

|             | (A)   | (B)  | (C)                        | (D)  | (E)  | (F)   | (G)  | (H)  | (I)  | (J)  | (K)                              | (L)                                       | (M)   | (N)                                       | (M)                                       |
|-------------|---|--|----------------------------|--|--|---|--|--|--|--|----------------------------------|---|---|---|---|
| Li<br>N     | ne o. Description   | Section (2)  | EAF Ratio (2)              | January-26                                       | February-26                                      | March-26  | April-26   | May-26   | June-26  | July-26  | August-26                        | September-26                              | October-26                                      | November-26                               | December-26                               |
| 1           | Proposed Cost per kWh - Attachment 2 (Line 17) 2 2024 True-up Factor (1) EAR Rates with True-up |  |                            | \$ 0.031762<br>\$ 0.000300<br><b>\$ 0.032062</b> | \$ 0.030131<br>\$ 0.000300<br>\$ <b>0.030431</b> | \$ 0.025229 \$<br>\$ 0.000300 \$<br><b>\$ 0.025529</b> \$ | 0.022691 \$<br>0.000300 \$<br><b>0.022991</b> \$ | 0.022550 \$<br>0.000300 \$<br><b>0.022850</b> \$ | 0.025524 \$<br>0.000300 \$<br><b>0.025824</b> \$ | 0.031564 \$<br>0.000300 \$<br><b>0.031864</b> \$ | 0.028497<br>0.000300<br>0.028797 | \$ 0.024421<br>\$ -<br>\$ 0.024421        | \$ 0.023119 8<br>\$ - 8<br>\$ 0.023119          | \$ 0.029573<br>\$ -<br>\$ 0.029573        | \$ 0.034758<br>\$ -<br>\$ 0.034758        |
| 3           | 4   | 9.01, 9.02   | 1.0555                     | \$ 0.033841                                      | s 0.032120                                       | \$ 0.026946 \$  | 0.024267 \$                                      | 0.024118 \$                                      | 0.027257 \$                                      | 0.033632 \$                                      | 0.030395                         | \$ 0.025776                               | \$ 0.024402 S                                   | \$ 0.031214                               | \$ 0.036687                               |
| 1           | Residential Farms General Service   | 9.01, 9.02<br>9.03<br>10.01, 10.02, 10.03, 10.07                         | 1.0281<br>1.0461           | \$ 0.033841<br>\$ 0.032963<br>\$ 0.033540        | \$ 0.032120<br>\$ 0.031286<br>\$ 0.031834        | \$ 0.026246 \$<br>\$ 0.026706 \$                          | 0.024267 \$<br>0.023637 \$<br>0.024051 \$        | 0.023492 \$<br>0.023903 \$                       | 0.02/25/ \$<br>0.026550 \$<br>0.027014 \$        | 0.032759 \$<br>0.033333 \$                       | 0.030395<br>0.029606<br>0.030125 | \$ 0.0257/6<br>\$ 0.025107<br>\$ 0.025547 | \$ 0.024402 8<br>\$ 0.023769 8<br>\$ 0.024185 8 | \$ 0.031214<br>\$ 0.030404<br>\$ 0.030936 | \$ 0.035735<br>\$ 0.036360                |
| 1           | General Service Large General Service Large General Service - TOD - Winter On-Peak              | 10.01, 10.02, 10.03, 10.07<br>10.04, 10.06, 11.01, 14.03<br>10.05, 10.06 | 1.0461<br>1.0207<br>1.2673 | \$ 0.033540<br>\$ 0.032726<br>\$ 0.040632        | \$ 0.031834<br>\$ 0.031061<br>\$ 0.038565        | \$ 0.026057 \$<br>\$ 0.032353 \$                          | 0.023467 \$<br>0.029136 \$                       | 0.023903 \$<br>0.023323 \$<br>0.028958           | 0.02/014 \$                                      | 0.032524 \$                                      | 0.030125                         | \$ 0.025547<br>\$ 0.024927                | \$ 0.024185 8<br>\$ 0.023598 8<br>\$ 0.029299 8 | \$ 0.030936<br>\$ 0.030185<br>\$ 0.037478 | \$ 0.035360<br>\$ 0.035477<br>\$ 0.044049 |
| 1 1         | <li>2 Large General Service - TOD - Winter Mid-Peak</li>  | 10.05, 10.06<br>10.05, 10.06<br>10.05, 10.06                             | 1.1106<br>0.8499           | \$ 0.040632<br>\$ 0.035608<br>\$ 0.027249        | \$ 0.033797<br>\$ 0.025863                       | \$ 0.032353 \$<br>\$ 0.028353 \$<br>\$ 0.021697 \$        | 0.025534 \$<br>0.019540 \$                       | 0.028958<br>0.025377<br>0.019420                 |  |  |                                  |   | \$ 0.029299 8<br>\$ 0.025676 8<br>\$ 0.019649 8 | \$ 0.037478<br>\$ 0.032844<br>\$ 0.025134 | \$ 0.038602<br>\$ 0.029541                |
| 1<br>1<br>1 | 5 Large General Service - TOD - Summer Mid-Peak   | 10.05, 10.06<br>10.05, 10.06<br>10.05, 10.06                             | 1.2664<br>0.9956<br>0.6896 |  |  |   |  | s<br>s   | 0.032704 \$<br>0.025710 \$<br>0.017808 \$        | 0.040353 \$<br>0.031724 \$<br>0.021973 \$        | 0.036469<br>0.028670<br>0.019858 | \$ 0.030927<br>\$ 0.024314<br>\$ 0.016841 |   |   |   |
| 1           | 7 Irrigation Service<br>8 Outdoor Lighting  | 11.02<br>11.03, 11.04, 11.07   | 0.9250<br>0.8645           | \$ 0.029657<br>\$ 0.027718                       | \$ 0.028149<br>\$ 0.026308                       | \$ 0.023614 \$<br>\$ 0.022070 \$                          | 0.021267 \$<br>0.019876 \$                       | 0.021136 \$<br>0.019754 \$                       | 0.023887 \$<br>0.022325 \$                       | 0.029474 \$<br>0.027546 \$                       | 0.026637<br>0.024895             | \$ 0.022589<br>\$ 0.021112                | \$ 0.021385 8<br>\$ 0.019986 8                  | \$ 0.027355<br>\$ 0.025566                | \$ 0.032151<br>\$ 0.030048                |
| 2 2         | O Controlled Service Deferred Load  | 11.05<br>14.01, 14.06<br>14.04   | 1.0210<br>0.9513<br>0.9883 | \$ 0.032735<br>\$ 0.030501<br>\$ 0.031687        | \$ 0.031070<br>\$ 0.028949<br>\$ 0.030075        | \$ 0.026065 \$<br>\$ 0.024286 \$<br>\$ 0.025230 \$        | 0.023474 \$<br>0.021871 \$<br>0.022722 \$        | 0.023330 \$<br>0.021737 \$<br>0.022583 \$        | 0.026366 \$<br>0.024566 \$<br>0.025522 \$        | 0.032533 \$<br>0.030312 \$<br>0.031491 \$        | 0.029402<br>0.027395<br>0.028460 | \$ 0.024934<br>\$ 0.023232<br>\$ 0.024135 | \$ 0.023604 8<br>\$ 0.021993 8<br>\$ 0.022849 8 | \$ 0.030194<br>\$ 0.028133<br>\$ 0.029227 | \$ 0.035488<br>\$ 0.033065<br>\$ 0.034351 |
| 2           |   | 14.07, 14.12   | 0.9164                     | \$ 0.029382                                      | s 0.027887                                       | \$ 0.023395 \$  | 0.021069 \$                                      | 0.020940 \$                                      | 0.023665 \$                                      | 0.029200 \$                                      | 0.026390                         | \$ 0.022379                               | \$ 0.021186                                     | \$ 0.027101                               | \$ 0.031852                               |

<sup>(1)</sup> As of the date of this filing, there is no Commission-approved true-up factor to be included in 2024 rates.
(2) Minnesota Class EAF Ratios in 13.01 Tariff as filed by Otter Tail on March 8, 2022, in Docket No. E017/GR-20-719.

### OTTER TAIL POWER COMPANY ELECTRIC UTILITY - STATE OF MINNESOTA AVERAGE COST OF ENERGY CALCULATION MINNESOTA SHARE

(A) (B) (C) (D) (E) (F) (G) (H) (I) (J) (K) (L) (M) (N) (O)

| Line     |  |              | 7.1             |              |              | ** **        |              | * 1 0/       |              |              | 0.1.00      |              | n 1 04       | 2026           |
|----------|--|--------------|-----------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|-------------|--------------|--------------|----------------|
| No.      | Description Source Attachment                          | January-26   | February-26     | March-26     | April-26     | May-26       | June-26      | July-26      | August-26    | September-26 | October-26  | November-26  | December-26  | Year End       |
| 1        | Plant Generation                                       | s 3.948.829  | \$ 2.712.925 \$ | 1.772.066 \$ | 1.235.583 \$ | 1.090.815 \$ | 975.809 \$   | 3.491.431 \$ | 3.137.777 \$ | 1.925.644    | 2,979,217   | \$ 2,314,558 | \$ 2,208,178 | \$ 27,792,834  |
| 2        | Steam Plant Reagents                                   | \$ 202,487   | \$ 183,478 \$   | 119.203 \$   | 81.058 \$    | 57,675 \$    | 22,205 \$    | 91,575 \$    | 109,336      | 64.126       | 103,973     | \$ 86,039    | 103,421      | \$ 1,224,575   |
| 2        | Purchased Power  | \$ 7,286,056 | \$ 6.059.699 \$ | 5.147.871 \$ | 4.325.026 \$ | 4.410.618 \$ | 5,442,393 \$ | 5,471,635 \$ | 4.334.398    | 4.108.621    | 3,434,519   | \$ 5,708,340 | 8.328.856    | \$ 64,058,034  |
| 3        | Wind Curtailment                                       |              |                 |              |              |              |              |              |              |              |             |              |              |                |
| 4        |  | \$ (2,812)   | \$ (538) \$     | 8,916 \$     | 587 \$       | 12,270 \$    | 19,091 \$    | 7,730 \$     | (7,813) \$   | 1,719        | 17,701      | \$ 2,951     | 8,767        | \$ 68,571      |
| 5        | Intersystem Sales (Fuel Cost of Asset-Based Sales)     | \$ (561,777) | \$ (117,744) \$ | (21) \$      | (50) \$      | - \$         | (64,721) \$  | (323,765) \$ | (193,555) \$ | (272,283) \$ | (455,020)   | \$ (30,055)  | \$ (72,141)  |                |
| 6        | MISO Resource Book Charge (excluding Schedule 16 & 17) | \$ (722,539) |                 | (512,632) \$ | (450,077) \$ | (453,953) \$ | (456,057) \$ | (483,201) \$ | (458,282) \$ | (403,167) \$ |             |              |              |                |
| 7        | SPP Resource Book Charge                               | \$ (57,135)  |                 | (11,803) \$  | 8,197 \$     | 7,999 \$     | (124,059) \$ | 8,462 \$     | 8,214 \$     | 7,551        | 8,474       | \$ 9,648     | \$ 10,731    | \$ (193,031)   |
| 8        | MISO Ancillary Services Market                         | \$ (130,077) | \$ (70,360) \$  | (42,986) \$  | (38,139) \$  | (53,785) \$  | (51,269) \$  | (41,873) \$  | (29,834) \$  | (85,084) \$  | (7,461)     | \$ (38,549)  | \$ (49,127)  | \$ (638,545)   |
| 9        | Minnesota Solar Generation Credit                      | \$ (228,052) | \$ (251,851) \$ | (299,607) \$ | (340,480) \$ | (388,273) \$ | (450,943) \$ | (936,874) \$ | (594,750) \$ | (385,864) \$ | (229,464)   | \$ (137,177) | \$ (248,971) | \$ (4,492,305) |
| 10       | Steam and Water Sales - Net Margin                     | \$ (54,808)  | \$ (56,679) \$  | (42,869) \$  | (19,206) \$  | (23,768) \$  | (35,522) \$  | (46,682) \$  | (44,662) \$  | (39,734) 8   | (37,804)    | \$ (37,564)  | \$ (50,061)  | \$ (489,359)   |
| 11       | Asset-Based Margins - 100%                             | \$ (903,583) | \$ (183,632) \$ | 1 \$         | (55) \$      | - s          | (18,560) \$  | (335,607) \$ | (211.450) \$ | (156,343) \$ | (320,575)   | \$ (17,393)  | (74.113)     | \$ (2,221,311) |
| 12       |  |              |                 | ·            |              |              |              |              |              |              |             |              |              |                |
| 13       | Fuel Costs & Purcahse Power for System Use - Minnesota | \$ 8,776,591 | \$ 7,663,224 \$ | 6,138,139 \$ | 4,802,445 \$ | 4,659,597 \$ | 5,258,368 \$ | 6,902,831 \$ | 6,049,378 \$ | 4,765,187    | 5,063,230   | \$ 7,371,582 | 9,633,699    | \$ 77,084,271  |
| 14       |  |              |                 |              |              |              |              |              |              |              |             |              |              |                |
| 15       | Energy for Minnesota Use (kWh)                         | 276,321,766  | 254,328,123     | 243,300,609  | 211,646,545  | 206,637,085  | 206,017,442  | 218,691,500  | 212,280,560  | 195,128,066  | 219,006,903 | 249,266,686  | 277,163,559  | 2,769,788,843  |
| 16<br>17 | Cost per kWh Line 13 / Line 15                         | \$ 0.03176   | s 0.03013 s     | 0.02523 \$   | 0.02269 \$   | 0.02255 \$   | 0.02552 \$   | 0.03156 \$   | 0.02850      | 0.02442      | 0.02312     | \$ 0.02957   | \$ 0.03476   | \$ 0.02783     |

#### CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01
Docket No. E017/AA-26-065

I, Valerie Moxness hereby certify that I have on 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 Reply Comments

Dated this 29th day of July, 2025.

/S/ VALERIE MOXNESS

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

| #  | First<br>Name | Last Name             | Email                                | Organization  | Agency  | Address   | Delivery<br>Method    | Alternate<br>Delivery<br>Method | View<br>Trade<br>Secret | Service<br>List<br>Name |
|----|---------------|-----------------------|--------------------------------------|---|---|---|-----------------------|---------------------------------|-------------------------|-------------------------|
| 1  | Mariah        | Bevins                | maria.bevins@whiteearth-nsn.gov      | White Earth<br>Reservation<br>Business<br>Committee |   | PO Box 418<br>White Earth<br>MN, 56591<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 2  | Tom           | Boyko                 | tboyko@eastriver.coop                | East River<br>Electric<br>Power Coop.               |   | 211 S. Harth<br>Ave<br>Madison SD,<br>57042<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 3  | Mike          | Bull                  | mike.bull@state.mn.us                |   | Public Utilities<br>Commission                                      | 121 7th Place<br>East, Suite<br>350<br>St. Paul MN,<br>55101<br>United States   | Electronic<br>Service |                                 | Yes                     | AA-25-<br>65            |
| 4  | Chris         | Byrnes                | cbyrnes@otpco.com                    | Otter Tail<br>Power<br>Company                      |   | 215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56538-<br>0496<br>United States   | Electronic<br>Service |                                 | Yes                     | AA-25-<br>65            |
| 5  | Ray           | Choquette             | rchoquette@agp.com                   | Ag<br>Processing<br>Inc.                            |   | 12700 West<br>Dodge Road<br>PO Box 2047<br>Omaha NE,<br>68103-2047<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 6  | Generic       | Commerce<br>Attorneys | commerce.attorneys@ag.state.mn.us    |   | Office of the<br>Attorney<br>General -<br>Department<br>of Commerce | 445<br>Minnesota<br>Street Suite<br>1400<br>St. Paul MN,<br>55101<br>United States  | Electronic<br>Service |                                 | Yes                     | AA-25-<br>65            |
| 7  | Jason         | Decker                | jason.decker@llojibwe.net            | Leech Lake<br>Band of<br>Ojibwe                     |   | 190 Sailstar<br>Drive NW<br>Cass Lake<br>MN, 56633<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 8  | Richard       | Dornfeld              | richard.dornfeld@ag.state.mn.us      |   | Office of the<br>Attorney<br>General -<br>Department<br>of Commerce | Minnesota<br>Attorney<br>General's<br>Office<br>445<br>Minnesota<br>Street, Suite<br>1800<br>Saint Paul<br>MN, 55101<br>United States | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 9  | Charles       | Drayton               | charles.drayton@enbridge.com         | Enbridge<br>Energy<br>Company,<br>Inc.              |   | 7701 France<br>Ave S Ste 600<br>Edina MN,<br>55435<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 10 | Kelly C.      | Engebretson           | kelly.engebretson@lawmoss.com        | Moss &<br>Barnett                                   |   | 150 S. 5th St<br>#1200<br>Minneapolis<br>MN, 55402<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 11 | Michael       | Fairbanks             | michael.fairbanks@whiteearth-nsn.gov | White Earth<br>Reservation<br>Business<br>Committee |   | PO Box 418<br>White Earth<br>MN, 56591<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 12 | Sharon        | Ferguson              | sharon.ferguson@state.mn.us          |   | Department<br>of Commerce   | 85 7th Place<br>E Ste 280<br>Saint Paul<br>MN, 55101-<br>2198<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 13 | Jessica       | Fyhrie                | jfyhrie@otpco.com                    | Otter Tail<br>Power<br>Company                      |   | PO Box 496<br>Fergus Falls<br>MN, 56538-  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |

| #  | First<br>Name | Last Name    | Email                              | Organization                           | Agency   | Address  | Delivery<br>Method    | Alternate<br>Delivery<br>Method | View<br>Trade<br>Secret | Service<br>List<br>Name |
|----|---------------|--------------|------------------------------------|--|--|--|-----------------------|---------------------------------|-------------------------|-------------------------|
|    |               |              |                                    |  |  | 0496<br>United States  |                       |                                 |                         |                         |
| 14 | Edward        | Garvey       | garveyed@aol.com                   | Residence                              |  | 32 Lawton St<br>Saint Paul<br>MN, 55102<br>United States                         | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 15 | Amber         | Grenier      | agrenier@otpco.com                 | Otter Tail<br>Power<br>Company         |  | 215 S.<br>Cascade St.<br>Fergus Falls<br>MN, 56537<br>United States              | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 16 | Adam          | Heinen       | aheinen@dakotaelectric.com         | Dakota<br>Electric<br>Association      |  | 4300 220th St<br>W<br>Farmington<br>MN, 55024<br>United States                   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 17 | Annete        | Henkel       | mui@mnutilityinvestors.org         | Minnesota<br>Utility<br>Investors      |  | 413 Wacouta<br>Street<br>#230<br>St.Paul MN,<br>55101<br>United States           | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 18 | Kristin       | Henry        | kristin.henry@sierraclub.org       | Sierra Club                            |  | 2101 Webster<br>St Ste 1300<br>Oakland CA,<br>94612<br>United States             | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 19 | Katherine     | Hinderlie    | katherine.hinderlie@ag.state.mn.us |  | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | 445<br>Minnesota St<br>Suite 1400<br>St. Paul MN,<br>55101-2134<br>United States | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 20 | Faron         | Jackson, Sr. | faron.jackson@llojibwe.net         |  |  | 190 Sailstar<br>Drive NW<br>Cass Lake<br>MN, 56633<br>United States              | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 21 | Richard       | Johnson      | rick.johnson@lawmoss.com           | Moss &<br>Barnett                      |  | 150 S. 5th<br>Street<br>Suite 1200<br>Minneapolis<br>MN, 55402<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 22 | Nick          | Kaneski      | nick.kaneski@enbridge.com          | Enbridge<br>Energy<br>Company,<br>Inc. |  | 11 East<br>Superior St<br>Ste 125<br>Duluth MN,<br>55802<br>United States        | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 23 | Michael       | Krikava      | mkrikava@taftlaw.com               | Taft Stettinius<br>& Hollister<br>LLP  |  | 2200 IDS<br>Center<br>80 S 8th St<br>Minneapolis<br>MN, 55402<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 24 | Bill          | Lachowitzer  | blachowitzer@ibewlocal949.org      | IBEW Local<br>Union 949                |  | 12908 Nicollet<br>Ave S<br>Burnsville<br>MN, 55337-<br>3527<br>United States     | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 25 | James D.      | Larson       | james.larson@avantenergy.com       | Avant Energy<br>Services               |  | 220 S 6th St<br>Ste 1300<br>Minneapolis<br>MN, 55402<br>United States            | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 26 | Eric          | Lipman       | eric.lipman@state.mn.us            |  | Office of<br>Administrative<br>Hearings  | PO Box<br>64620<br>St. Paul MN,<br>55164-0620<br>United States                   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |

| #  | First<br>Name         | Last Name                            | Email                                    | Organization                         | Agency   | Address   | Delivery<br>Method    | Alternate<br>Delivery<br>Method | View<br>Trade<br>Secret | Service<br>List<br>Name |
|----|-----------------------|--------------------------------------|--|--------------------------------------|--|---|-----------------------|---------------------------------|-------------------------|-------------------------|
| 27 | Kavita                | Maini                                | kmaini@wi.rr.com                         | KM Energy<br>Consulting,<br>LLC      |  | 961 N Lost<br>Woods Rd<br>Oconomowoc<br>WI, 53066<br>United States                                    | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 28 | Tim                   | Miller                               | tim,miller@mrenergy.com                  | Missouri<br>River Energy<br>Services |  | 3724 W Avera<br>Dr<br>PO Box<br>88920<br>Sioux Falls<br>SD, 57109-<br>8920<br>United States           | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 29 | Andrew                | Moratzka                             | andrew.moratzka@stoel.com                | Stoel Rives<br>LLP                   |  | 33 South<br>Sixth St Ste<br>4200<br>Minneapolis<br>MN, 55402<br>United States                         | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 30 | Matthew               | Olsen                                | molsen@otpco.com                         | Otter Tail<br>Power<br>Company       |  | 215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56537<br>United States                          | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 31 | Marcia                | Podratz                              | mpodratz@mnpower.com                     | Minnesota<br>Power                   |  | 30 W Superior<br>S<br>Duluth MN,<br>55802<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 32 | David G.              | Prazak                               | dprazak@otpco.com                        | Otter Tail<br>Power<br>Company       |  | P.O. Box 496<br>215 South<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56538-<br>0496<br>United States | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 33 | Rate<br>Case<br>Inbox | Rate Case<br>Inbox                   | mnratecase@otpco.com                     | Otter Tail                           |  | null null, null<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 34 | Generic<br>Notice     | Regulatory                           | regulatory_filing_coordinators@otpco.com | Otter Tail<br>Power<br>Company       |  | 215 S.<br>Cascade<br>Street<br>Fergus Falls<br>MN, 56537<br>United States                             | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 35 | Generic<br>Notice     | Residential<br>Utilities<br>Division | residential.utilities@ag.state.mn.us     |                                      | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | 1400 BRM<br>Tower<br>445<br>Minnesota St<br>St. Paul MN,<br>55101-2131<br>United States               | Electronic<br>Service |                                 | Yes                     | AA-25-<br>65            |
| 36 | Peter                 | Scholtz                              | peter.scholtz@ag.state.mn.us             |                                      | Office of the<br>Attorney<br>General -<br>Residential<br>Utilities<br>Division | Suite 1400<br>445<br>Minnesota<br>Street<br>St. Paul MN,<br>55101-2131<br>United States               | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 37 | Robert H.             | Schulte                              | rhs@schulteassociates.com                | Schulte<br>Associates<br>LLC         |  | 1742 Patriot<br>Rd<br>Northfield MN,<br>55057<br>United States  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 38 | Janet                 | Shaddix<br>Elling                    | jshaddix@janetshaddix.com                | Shaddix And<br>Associates            |  | 7400 Lyndale<br>Ave S Ste 190<br>Richfield MN,<br>55423<br>United States                              | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 39 | Cary                  | Stephenson                           | cstephenson@otpco.com                    | Otter Tail<br>Power<br>Company       |  | 215 South<br>Cascade<br>Street  | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |

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|----|---------------|------------|--------------------------------|---|---|-----------------------|---------------------------------|-------------------------|-------------------------|
|    |               |            |                                |   | Fergus Falls<br>MN, 56537<br>United States  |                       |                                 |                         |                         |
| 40 | William       | Taylor     | bill.taylor@taylorlawsd.com    | Taylor Law<br>Firm                                  | 4820 E. 57th<br>Street<br>Suite B<br>Sioux Falls<br>SD, 57108<br>United States                        | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 41 | Stuart        | Tommerdahl | stommerdahl@otpco.com          | Otter Tail<br>Power<br>Company                      | 215 S<br>Cascade St<br>PO Box 496<br>Fergus Falls<br>MN, 56537<br>United States                       | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 42 | Pat           | Treseler   | pat.jcplaw@comcast.net         | Paulson Law<br>Office LTD                           | 4445 W 77th<br>Street<br>Suite 224<br>Edina MN,<br>55435<br>United States                             | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 43 | Laurie        | Williams   | laurie.williams@sierraclub.org | Sierra Club   | Environmental<br>Law Program<br>1536<br>Wynkoop St<br>Ste 200<br>Denver CO,<br>80202<br>United States | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 44 | Laurie        | York       | laurie.york@whiteearth-nsn.gov | White Earth<br>Reservation<br>Business<br>Committee | PO Box 418<br>White Earth<br>MN, 56591<br>United States   | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |
| 45 | Patrick       | Zomer      | pat.zomer@lawmoss.com          | Moss &<br>Barnett PA                                | 150 S 5th St<br>#1200<br>Minneapolis<br>MN, 55402<br>United States                                    | Electronic<br>Service |                                 | No                      | AA-25-<br>65            |