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April 12, 2021

Will Seuffert
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 Petition for Approval of the Customer Eligibility, Updated Baseline, Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate, Rate Schedule 13.09.
Docket No. E017/M-21-99
RESPONSE TO SUPPLEMENTAL COMMENTS**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission its Response to Supplemental Comments in the above described matter.

Otter Tail electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, Subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General-Antitrust & Utilities Division.

If you have any questions regarding this filing, please contact me at 218-739-8819 or at dmandelke@otpc.com. A Certificate of Service is enclosed.

Sincerely,

/s/ *DARLENE C. MANDELKE*
Darlene C. Mandelke, Rates Analyst
Regulatory Administration

cjh
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 Customer
Eligibility, Updated Baseline, Annual Update
to its Energy-Intensive, Trade-Exposed Rider
Surcharge Rate, Rate Schedule 13.09

Docket No. E017/M-21-099

**OTTER TAIL POWER COMPANY
RESPONSE TO SUPPLEMENTAL
COMMENTS**

I. INTRODUCTION

On February 1, 2021, Otter Tail Power Company (Otter Tail or the Company) filed a petition with the Minnesota Public Utilities Commission (Commission) for approval of its renewal of customer eligibility, updated baseline and annual update to the Energy-Intensive, Trade-Exposed (EITE) Rider Surcharge Rate under Otter Tail’s Rate Schedule 13.09. surcharge rate to be effective December 1, 2021.

On March 19, 2021, the Minnesota Department of Commerce, Division of Energy Resources (Department) filed Comments requesting Otter Tail address three issues: 1) Has the Company made a \$10,000 deposit to a low-income agency as part of this filing? 2) Can the Company update its low-income sales average kWh per year for use in the 2021-2025 period in its Reply Comment, and 3) Will OTP change the word “decrease” to “increase” in its bill notice?

On March 19, 2021, the Office of the Attorney General – Residential Utilities Division (OAG) also filed Comments requesting the Commission require any future upward adjustment not to exceed the original 2016 baseline.

On March 29, 2021, Otter Tail addressed the issues brought forth by the Department and the OAG in its Reply Comments.

On April 5, 2021, the Department filed Supplemental Comments responding to Otter Tail’s Reply Comments and the OAG’s Comments. The Department stated the issues it had identified were resolved and agreed with the OAG’s request to limit the EITE Customer Group’s annual baseline energy sales to the total annual usage approved in the 2016 EITE filing or a lesser amount.

Otter Tail re-addresses the baseline cap in this filing.

II. OTTER TAIL RESPONSE

Otter Tail maintains its request that the Commission not decide at this time any future upward adjustment to the baseline be capped at the original 2016 baseline. Order points 5 and 6 from the Commission's May 29, 2018 ORDER AUTHORIZING COST RECOVERY WITH CONDITIONS established a baseline sales number for EITE Customers and required that any increased revenues for the Company resulting from the EITE discount to be refunded to customers paying the EITE Rider surcharge rate and required the Company to provide annual sales data and revenue from EITE Customers. Order Point 5 requires Otter Tail to refund any increased EITE customer revenues from increased operations **after the four-year discount term is complete**. Because the first four-year discount term will be complete on November 30, 2021, and a second four-year discount term will commence, if approved, it would be appropriate to update the baseline up or down at the renewal of each four-year discount term and have no cap placed on future baselines at this time. Future baselines should take into consideration, circumstances that exist at the time of setting the baseline.

III. CONCLUSION

Otter Tail appreciates the opportunity to provide this response to the Supplemental Comments of the Department regarding Otter Tail's 2021 Customer Eligibility, Updated Baseline, and Annual Update to its EITE Surcharge Rate. Otter Tail requests the Commission not cap any future upward adjustment at the original 2016 baseline and requests Commission approval of the EITE Surcharge Rate of 0.00039 per kWh effective December 1, 2021.

Dated: April 12, 2021

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ DARLENE C. MANDELKE

Darlene C. Mandelke

Rates Analyst

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

(218) 739-8819

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate, Rate Schedule 13.09
Docket No. E017/M-21-99**

I, Carly Haiby, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert 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
Response to Supplemental Comments**

Dated this **12th** day of **April, 2021**.

/s/ CARLY HAIBY
Carly Haiby
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_21-99_Official Service List 21-99
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_21-99_Official Service List 21-99
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-99_Official Service List 21-99
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_21-99_Official Service List 21-99
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