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September 01, 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 its
2021 Annual Review of Depreciation Certification
Docket No. E017/D-21-**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits its 2021 Annual Review of Depreciation Certification.

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-Residential Utilities Division. A Certificate of Service is also enclosed.

Please contact me at (218) 739-8659 or ldemmer@otpc.com if you have any questions.

Sincerely,

/s/ LOYAL K. DEMMER
Loyal K. Demmer, CMA
Senior Depreciation Accountant

tlk
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
its 2021 Annual Review of
Depreciation Certification**

Docket No. E017/D-21-

SUMMARY OF FILING

Please take notice that on September 1, 2021, Otter Tail Power Company filed its 2021 Annual Review of Depreciation Certification with the Minnesota Public Utilities Commission. The study is being filed pursuant to Minn. R. 7825.0700.

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

**In the Matter of Otter Tail Power
Company's Petition for Approval of its
2021 Annual Review of Depreciation
Certification**

Docket No. E017/D-21-

**PETITION OF OTTER TAIL POWER
COMPANY**

I. INTRODUCTION

Pursuant to Minn. R. 7825.0700, Otter Tail Power Company (Otter Tail or the Company) hereby files its 2021 Annual Petition for Depreciation Certification. Otter Tail requests that the study be certified effective January 1, 2022.

II. GENERAL FILING INFORMATION

Pursuant to Minn. R. 7829.1300, subp. 4, Otter Tail provides the following general information.

A. Name, Address, and Telephone Number of Utility

Otter Tail Power Company
215 South Cascade Street
Post Office Box 496
Fergus Falls, MN 56538-0496
(218) 739-8200

B. Name, Address, and Telephone Number of Utility Attorney

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Post Office Box 496
Fergus Falls, MN 56538-0496
(218) 739-8956
cstephenson@otpc.com

C. Date of Filing and Date Proposed Remaining Lives and Salvage Percentages to Take Effect

The filing date is September 1, 2021 and is based on plant-in-service and accumulated reserve balances as of December 31st, 2020. Otter Tail requests that the proposed remaining lives and salvage percentages be approved effective January 1, 2022, for 2022 depreciation expense and accumulated reserve calculation purposes.

D. Controlling Law for the Filing

Minn. Stat. §216B.08 and §216B.11, and Minn. R. 7825.0700 – 7825.0900 control the filing.

E. Title of Utility Employee Responsible for Filing

Loyal K. Demmer, CMA
Senior Depreciation Accountant
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III. DESCRIPTION OF FILING

This filing constitutes Otter Tail’s 2021 Annual Petition for Depreciation Certification. Otter Tail’s last five-year comprehensive depreciation study was filed in 2018 and approved by the Minnesota Public Utilities Commission (Commission) on July 17, 2019, in Docket No. E017/D-18-568. Otter Tail’s next five-year comprehensive depreciation study is due September 1, 2023. Annual depreciation certification filings are to be filed on or before September 1 of each year in the four interim years between the five-year comprehensive depreciation studies.

This petition contains four attachments:

1. 2021 Depreciation Rate Study prepared by Foster Associates Consultants, LLC, Attachment No. 1
2. Proposed Remaining Lives and Salvage Percentages for Use in 2022, Attachment No. 2
3. Supplemental Comments, Attachment No. 3

4. Comparison of Retirement Dates between this filing and the Company's most recent Commission approved Resource Plan that was filed in Docket No. E017/RP-16-386, Attachment No. 4

Attachment No. 1 contains Statement B, which is a Comparison of Current and Proposed Accruals showing depreciation expense for both total Company and the portion allocated to the Minnesota jurisdiction based on plant in-service balances as of December 31, 2020. Other statements in Attachment No. 1 provide the rest of the schedules required in an annual review of depreciation.

Attachment No. 2 lists the property accounts for which the Company requests certification of the remaining lives and salvage percentages to be used in determining 2022 depreciation rates.

Attachment No. 3, "Supplemental Comments," addresses additional information not included in Attachment No. 1; specifically, it includes comments related to long-term depreciation planning and explanations about future plant additions and retirements.

Attachment No. 4 provides a schedule and narrative explaining differences between the remaining lives used in this Petition and the Company's most recent Commission approved Integrated Resource Plan that was filed on June 1, 2016.

IV. OTHER DEPRECIATION FILING MATTERS

A. Peaking Capacity Cost Information

The Commission's Order Accepting Resource Plan Change, (Docket No. E017/RP-05-968) dated March 26, 2009 (2009 IRP Order), requires that: "In its first depreciation filing that includes new peaking generators, Otter Tail shall compare the last rate case's short-term peaking capacity costs to the peaking capacity costs of the new generators." This filing with plant in service balances as of December 31st, 2020, does not include any new peaking generators in service, so there is no cost information to report with this filing. Otter Tail did place into service its new Astoria Station peaking generator for commercial operation in Q1 2021; therefore, Otter Tail will be able to apply those 2021 plant-in-service peaking costs in its 2022 depreciation filing, in order to comply with the 2009 IRP Order requirement for peaking plants.

Otter Tail respectfully requests that the Commission consider whether the 2009 IRP Order peaking plant reporting requirement remains relevant and useful in light of Otter Tail's pending rate proceeding (Docket No. E017/GR-20-719), and the filing of our 2021 Integrated Resource

Plan (which has the same filing date as this annual depreciation filing). These filings and the passage of time call into question whether it is necessary to include the peaking plant reporting requirement in next year's depreciation filing.

B. Remaining Lives and Salvage Percentages

Otter Tail derives its Remaining Lives and Salvage Percentages based on 5-year Depreciation Studies and subsequently updates them annually in Technical Updates during each of the interim four years. These calculations are as of the Depreciation Study or annual Technical Update date (12/31 of the prior calendar year). These are then analyzed through the depreciation certification process and are proposed for use in the year following that year's depreciation certification filing to be used for calculating depreciation expense and accumulated reserve purposes. This results in a systematic and consecutive one-year lag, which when applied consistently over time yields uniform depreciation expense recognition in a rate regulated environment. In this filing, Otter Tail continues to reduce its depreciation study calculated Remaining Life for all AYFR property by one year to account for the passage of time from the depreciation study date to the effective date when the depreciation parameters will actually be applied for depreciation expense and reserve calculation purposes.

1. Hoot Lake Plant Decommissioning:

On December 31, 2020, the book date of this filing, the Hoot Lake Plant (HLP) reserve ratio was at 110.4 percent (without the ash landfill which has a longer remaining life). The salvage percentage proposed and approved in Otter Tail's last Depreciation filing for Hoot Lake Plant was -18.9 percent (Docket No. E017/D-20-703) for use in 2021 depreciation expense calculation purposes. This reflects a target reserve ratio for end of plant life of 118.9 percent, netting to an additional 8.5 percent (118.9 percent - 110.4 percent) of the plant's in service balance as needed in 2021 depreciation expense. That amount was realized through June 2021 bringing the applicable plant accounts to being fully depreciated in 2021.

2. Hydro Relicensing

Otter Tail's current Federal Energy Regulatory Commission (FERC) hydro license expires in 2021. Otter Tail is in the process of license renewal (a multi-year endeavor). The renewed license, when granted, is expected to be for a forty-year term per FERC's standard licensing terms. Otter Tail has to date completed all the necessary hydro licensing filing obligations, and the process

is under the review of the FERC. Otter Tail is not aware of any issues that would hinder relicensing. Like Otter Tail's current FERC hydro license, Otter Tail is linking the productive remaining lives of its hydro facilities to the term of this forty-year hydro license since this license is required to be able to operate the units for electrical generation.

3. Bemidji Hydro Plant

Recently Otter Tail experienced a major mechanical failure at the Bemidji Hydro plant. Taken together, the plant's age, location, and the challenge of staffing the facility with maintenance personnel experienced in hydro applications indicated it was not prudent to continue electrical generation at the facility. Otter Tail reviewed accounting options for the treatment of this facility which including writing off the value of the facility in 2021, and is not requesting any further remaining life for this facility in Attachment 2, Proposed Remaining Lives and Salvage Percentages for use in depreciation expense and reserve calculations in 2022. The Bemidji Hydro facility which operates on the Mississippi river at Bemidji, MN does not operate under the FERC jurisdiction, and is not part of the FERC hydro relicensing process.

4. Astoria Station

Construction began in May 2019 on Otter Tail's Astoria Station, a 245-MW simple-cycle natural gas combustion turbine in east central South Dakota. The facility went into commercial service in Q1 2021 trailing the plant in service book date of December 31st, 2020 for this filing. Since this current depreciation certification is requesting remaining lives and salvage percentages for use in calculating depreciation rates for calendar year 2022, Otter Tail is requesting Commission approval of a Remaining Life of thirty-four-years (35-1 (for the passage of time)), and a net negative salvage percentage of -1.60 percent for use in 2022 depreciation expense and accumulated reserve calculation purposes consistent with agreements reached in last year's depreciation filing. Otter Tail plans for a more formal decommissioning estimate to be initiated for our next comprehensive depreciation study in 2022 for use in our 2023 five-year depreciation filing.

5. Merricourt Wind Energy Center

The 75 turbines at the Merricourt Wind Energy Center became fully commercially available for service in December 2020. Now with plant in service and accumulated depreciation

reserve postings, Otter Tail includes this facility for its inaugural inclusion as a used and useful asset in this depreciation study.

6. Hoot Lake Solar Project

Otter Tail is in the planning and procurement stages for the Hoot Lake Solar farm. As procurement commitment and construction schedules firm up, Otter Tail will in future depreciation filings be requesting remaining life and salvages percentages for this facility.

C. Request to rebalance reserves in our 2023 5-year depreciation filing

It has been approximately a decade since the Commission issued its Order in Docket E-017/D-11-886 prohibiting Otter Tail from redistributing accumulated depreciation reserve imbalances. We respectfully request that the Commission reconsider this directive. Our inability to realign depreciation reserves among primary plant accounts has contributed to increased variability of annual depreciation rates, increased depreciation expense and has removed an important option for achieving capital recovery when under-accrued production plants are retired from service. Otter Tail therefore requests authorization in the current depreciation filing to submit a 2023, 5-year depreciation study with rebalanced depreciation reserves.

V. MISCELLANEOUS INFORMATION

A. Pursuant to Minn. R. 7829.0700, Otter Tail Requests that the Following Persons be Placed on the Commission's Official Service List for this Proceeding:

Loyal K. Demmer, CMA
Senior Depreciation Accountant
Otter Tail Power Company
215 South Cascade Street
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Fergus Falls, MN 56538-0496
ldemmer@otpc.com

and

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Post Office Box 496
Fergus Falls, MN 56538-0496
cstephenson@otpc.com

B. Service on Other Parties

Otter Tail served a copy of this filing on the Department of Commerce – Division of Energy Resources and the Office of Attorney General – Antitrust & Utilities Division, and a summary of the filing on all parties on the attached general service list.

C. Summary of Filing

A one-paragraph summary of the Petition is attached.

VI. CONCLUSION

Otter Tail respectfully requests that the Commission approve this annual petition for depreciation certification, to be effective January 1, 2022.

Dated: September 1, 2021

Respectfully submitted,

OTTER TAIL POWER COMPANY

/s/ LOYAL K. DEMMER

Loyal K. Demmer, CMA
Senior Depreciation Accountant
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2021 Technical Update



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August 2021

EXECUTIVE SUMMARY

INTRODUCTION

This report presents the findings and recommendations developed in a 2021 technical update of depreciation rates for Otter Tail Power Company (Otter Tail or Company) prepared by Foster Associates Consultants, LLC. The parameters (*i.e.*, projection curves, projection lives and future net salvage rates) used in the update were developed in the Company's 2018 Depreciation Study based on December 31, 2017 plant and reserve balances. Age distributions of surviving plant on December 31, 2020 were used in the 2021 update to derive composite service life statistics and theoretical depreciation reserves.

The purpose of a technical update is to adjust depreciation rates for changes in the variables associated with a remaining life accrual rate. The variables for an account include the age distribution of surviving plant, the recorded depreciation reserve and the average net salvage rate used in the calculation of a theoretical reserve. A technical update retains the parameters developed and/or approved in the most recent full depreciation study and adjusts depreciation rates for subsequent changes in plant, reserves and realized net salvage activity.

The principal findings from this review are summarized in the attached statements. Statement A provides a comparative summary of current and updated annual depreciation rates for each rate category. Statement B provides a comparison of current and updated annual depreciation accruals. Statement C provides a comparison of recorded and computed depreciation reserves for each rate category. Statement D provides a summary of the components used to obtain a weighted-average net salvage rate for each plant account. Statement E provides a computation of estimated future net salvage rates for life-span categories. Statement F provides a comparative summary of current and updated parameters and statistics including projection life, projection curve, average service life, average remaining life, and average and future net salvage rates.

SCOPE OF UPDATE

The principal activities undertaken in the course of conducting the 2021 technical update included:

- Collection of plant and net salvage data;
- Reconciliation of data to the official records of the Company;
- Development of continuity schedules;
- Computation of average net salvage rates; and
- Development of adjusted accrual rates for each rate category.

Accrual rates currently used by Otter Tail were developed from composite service-life statistics approved in Docket No. E-017/D-20-703. Depreciation accruals and reserve activity recorded in 2020 were posted to December 31, 2019 reserves to obtain appropriate reserve ratios for the 2021 technical update.

Notwithstanding that Otter Tail responsibly rebalanced depreciation reserves (with Commission approval) in each full study and each technical update for nearly twenty (20) years, the Department objected in Docket No. E-017/D-11-886 claiming that: "... the only clear effect of OTP's practice of redistributing reserves is to create a layer of confusion on OTP's depreciation calculations." The Commission concurred with the Department and ordered that: "OTP shall discontinue redistributing its depreciation reserves effective with this filing." The stability in accrual rates and control of amortization accounts that Otter Tail achieved by rebalancing depreciation reserves has been abolished by Commission order and removed from this and all future studies and technical updates.

UPDATED DEPRECIATION RATES

Table 1 below provides a summary of the changes in annual rates and accruals resulting from the 2021 technical update. Rates updated for each primary account (with the exception of amortization accounts) have been developed including authorized allowances for net salvage.

Function	Accrual Rates			2021 Annualized Accrual		
	Current	Updated	Difference	Current	Updated	Difference
A	B	C	D=C-B	E	F	G=F-E
<i>Intangible Plant</i>	12.23%	12.23%	0.00%	\$ 3,187,638	\$ 3,187,638	\$ -
<i>Steam Production</i>	3.73%	3.34%	-0.39%	21,595,798	19,344,411	(2,251,387)
<i>Hydraulic Production</i>	12.44%	0.93%	-11.51%	1,275,943	94,798	(1,181,145)
<i>Other Production</i>	3.14%	3.14%	0.00%	1,281,002	1,283,725	2,723
<i>Wind Production</i>	1.43%	2.93%	1.50%	7,422,651	15,192,055	7,769,404
<i>Solar Production</i>	4.04%	4.24%	0.20%	12,663	13,307	644
<i>Transmission</i>	1.62%	1.61%	-0.01%	10,865,688	10,813,536	(52,152)
<i>Distribution</i>	2.35%	2.36%	0.01%	12,829,416	12,846,829	17,413
<i>General Plant</i>	4.65%	4.64%	-0.01%	2,666,553	2,658,214	(8,339)
Total Utility	2.49%	2.67%	0.18%	\$61,137,352	\$65,434,513	\$4,297,161

Table 1. Current and Updated Rates and Accruals

Adjustments developed in the technical update produce a composite depreciation rate of 2.67 percent. Depreciation expense is currently accrued at an equivalent rate of 2.49 percent. The updated change in the composite depreciation rate is, therefore, a increase of 0.18 percentage points.

A continued application of rates derived from currently approved parameters would produce annual depreciation expense of \$61,137,352 compared with an annual expense of \$65,434,513 using rates developed in the update. The total utility expense increase of \$4,297,161 is largely attributable to the Merricourt Wind Energy Center that became operational in December 2020. Changes in the mix of plant investments among primary accounts and changes in the age distributions of surviving plant also contribute to the total utility increase. (The change in accruals would be an increase of \$2,792,062 if Otter Tail were permitted to rebalance depreciation reserves). The portion of the \$4,297,161 reduction allocated to the Minnesota jurisdiction is \$2,332,186.

STATEMENTS

INTRODUCTION

This section provides a comparative summary of depreciation rates, annual depreciation accruals, recorded and computed depreciation reserves, and current and updated service life and net salvage parameters for Otter Tail Power Company. The content of these statements is briefly described below.

- Statement A provides a comparative summary of current and updated annual depreciation rates for calendar year 2021 using the straight-line method, vintage group procedure, remaining-life technique.
- Statement B provides a comparison of the current and updated annualized depreciation accruals for calendar year 2021 based upon the rates developed in Statement A.
- Statement C provides a comparison of recorded and computed reserves for each rate category.
- Statement D provides a summary of the components used to obtain a weighted average net salvage rate for each rate category.
- Statement E provides a computation of the estimated future net salvage rate for life-span categories.
- Statement F provides a comparative summary of current and updated parameters including projection life, projection curve and future net salvage rates. The statement also contains current and updated statistics including average service life, average remaining life, and average net salvage rates.

Current depreciation accruals shown on Statement B are the product of the plant investment (Column B) and the current depreciation rates (Column D) shown on Statement A. Similarly, updated depreciation accruals shown on Statement B are the product of the plant investment and updated depreciation rates (Column H) shown on Statement A. Remaining life accrual rates are given by:

$$\text{Accrual Rate} = \frac{1.0 - \text{Reserve Ratio} - \text{Future Net Salvage Rate}}{\text{Remaining Life}}$$

Minnesota State Agency Rules 7825.0700, Subpart 1 provide that each utility shall file the following schedules (for each year since the last certification) in the form prescribed by the Commission.

1. Plant in service (by primary account):
 - a) Beginning and ending plant balances;
 - b) Additions and retirements; and
 - c) Adjustments and transfers.
2. Analysis of depreciation reserve (by primary account):
 - a) Beginning and ending reserve balances;
 - b) Depreciation accruals and plant retirements;
 - c) Cost of removal and gross salvage value; and
 - d) Transfers, adjustments and other debits (credits).
3. Summary of annual depreciation accruals (by primary account):
 - a) Plant balance;
 - b) Estimated net salvage;
 - c) Depreciation reserve;
 - d) Probable service life; and
 - e) Depreciation accrual and rate.

While the Agency rules do not require submission of continuity schedules in a technical update, this section includes the following statements which contain the above information for calendar year 2020:

1. Statement G – Plant Activity;
2. Statement H – Analysis of Depreciation Reserve; and
3. Statement I – Summary of Annual Depreciation Accruals.

Minnesota State Agency Rules 7825.0700, Subpart 2-B provide that each utility shall disclose a list of any major future additions or retirements to the plant accounts that the utility believes may have a material effect on the current certification results. Any future additions or retirements that would materially affect the current certification results are discussed in the Company's application.

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

Account Description A	Current			Updated			
	Rem. Life B	Fut. Net Salvage C	Accrual Rate D	Rem. Life E	Fut. Net Salvage F	Reserve Ratio G	Accrual Rate H
INTANGIBLE PLANT							
303.91 Software - 5 Year	← 5 Year Amortization →			← 5 Year Amortization →			
303.92 Software - 10 Year	← 10 Year Amortization →			← 10 Year Amortization →			
Total Intangible Plant			12.25%	6.08		27.41%	12.25%
STEAM PRODUCTION							
311.00 Structures and Improvements	23.28	-7.2%	2.69%	22.38	-7.3%	51.96%	2.62%
312.00 Boiler Plant Equipment	18.95	-8.1%	4.29%	18.02	-8.2%	43.73%	3.77%
312.10 Boiler Plant Equipment - Landfill	30.24		2.25%	29.32		34.29%	2.24%
314.00 Turbogenerator Units	17.58	-9.1%	3.38%	16.70	-9.2%	70.21%	2.94%
315.00 Accessory Electric Equipment	21.59	-7.7%	2.76%	20.70	-7.8%	59.10%	2.58%
316.00 Miscellaneous Power Plant Equipment	15.25	-9.0%	4.95%	14.67	-9.1%	55.23%	4.06%
Total Steam Production Plant			3.73%	18.95	-7.9%	49.37%	3.34%
HYDRAULIC PRODUCTION							
331.00 Structures and Improvements	1.50		8.65%	38.30		95.73%	0.11%
332.00 Reservoirs, Dams and Waterways	1.50		13.60%	38.40		53.14%	1.22%
333.00 Water Wheels, Turbines & Generators	1.50		7.86%	38.36		96.14%	0.10%
334.00 Accessory Electric Equipment	1.50		8.09%	38.34		96.01%	0.10%
335.00 Miscellaneous Power Plant Equipment	1.50		15.96%	38.39		92.13%	0.21%
Total Hydraulic Production Plant			12.44%	38.39		64.51%	0.92%
OTHER PRODUCTION							
341.00 Structures and Improvements			3.09%	16.68	-2.1%	50.06%	3.09%
342.00 Fuel Holders and Accessories			2.87%	15.08	-3.6%	59.32%	2.88%
343.00 Prime Movers			3.17%	15.70	-3.2%	51.94%	3.18%
344.00 Generators							
345.00 Accessory Electric Equipment			2.81%	15.76	-3.2%	58.18%	2.82%
346.00 Miscellaneous Power Plant Equipment			3.37%	15.72	-2.8%	48.87%	3.38%
Total Other Production Plant			3.13%	15.81	-3.0%	52.28%	3.14%
WIND PRODUCTION							
341.00 Structures and Improvements			1.38%	16.86	-5.1%	25.36%	2.87%
344.00 Generators			1.43%	21.85	-5.1%	24.23%	2.93%
345.00 Accessory Electric Equipment			1.39%	17.35	-5.1%	25.28%	2.88%
346.00 Miscellaneous Power Plant Equipment			3.42%	21.83	-5.5%	-0.01%	4.83%
Total Wind Production Plant			1.43%	21.57	-5.1%	24.32%	2.92%
SOLAR PRODUCTION							
343.00 Prime Movers			4.04%	21.85	-1.0%	2.28%	4.25%
Total Solar Production Plant			4.04%	21.85	-1.0%	2.28%	4.25%
TRANSMISSION PLANT							
353.00 Station Equipment	55.50	-5.0%	1.57%	56.36	-5.0%	17.58%	1.55%
354.00 Towers and Fixtures	70.54	-10.0%	1.46%	70.13	-10.0%	7.29%	1.46%
355.00 Poles and Fixtures	59.83	-50.0%	1.84%	60.09	-50.0%	38.95%	1.85%
356.00 Overhead Conductors and Devices	64.91	-30.0%	1.64%	62.95	-30.0%	27.97%	1.62%
358.00 Underground Conductors and Devices	13.70	-5.0%	0.62%	13.11	-5.0%	97.11%	0.60%
Total Transmission Plant			1.62%	62.54	-22.7%	22.00%	1.61%

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

Account Description	Current			Updated			
	Rem. Life	Fut. Net Salvage	Accrual Rate	Rem. Life	Fut. Net Salvage	Reserve Ratio	Accrual Rate
A	B	C	D	E	F	G	H
DISTRIBUTION PLANT							
362.00 Station Equipment	34.85	5.0%	1.96%	34.48	5.0%	28.30%	1.93%
364.00 Poles, Towers and Fixtures	48.52	-100.0%	2.91%	48.18	-100.0%	59.91%	2.91%
365.00 Overhead Conductors and Devices	42.96	-75.0%	2.25%	43.12	-75.0%	76.87%	2.28%
367.00 Underground Conductors and Devices	29.04	-5.0%	2.04%	29.08	-5.0%	44.86%	2.07%
368.00 Line Transformers	30.77	30.0%	1.77%	30.45	30.0%	16.77%	1.75%
369.00 Overhead Services	29.87	-200.0%	5.91%	29.40	-200.0%	126.81%	5.89%
369.10 Underground Services	33.20	-20.0%	2.24%	32.89	-20.0%	46.00%	2.25%
370.00 Meters	19.51		3.35%	19.37		34.67%	3.37%
370.05 Smart Meters	18.57		5.13%	17.57		9.41%	5.16%
370.10 Load Management Switches	2.17		1.74%	1.75		97.62%	1.36%
371.20 Other Private Lighting	24.46		3.61%	24.50		8.42%	3.74%
373.00 Street Lighting and Signal Systems	16.60	-5.0%	4.10%	18.12	-5.0%	23.35%	4.51%
Total Distribution Plant			2.36%	30.85	-23.0%	43.44%	2.36%
GENERAL PLANT							
Depreciable							
390.00 Structures and Improvements	33.37	5.0%	1.90%	32.84	5.0%	33.29%	1.88%
390.10 General Office Buildings	19.95	44.7%	0.81%	19.00	45.0%	39.52%	0.81%
390.20 Fleet Service Center Building	24.68	68.0%	0.60%	23.74	67.9%	20.38%	0.49%
390.30 Central Stores Building	24.61	75.8%	-0.54%	23.68	75.8%	36.86%	-0.53%
396.00 Power Operated Equipment	20.12	5.0%	4.07%	19.85	5.0%	15.54%	4.00%
397.40 Communication Towers	31.31	-5.0%	1.71%	30.52	-5.0%	53.23%	1.70%
Total Depreciable			1.40%	27.14	24.5%	33.99%	1.38%
Amortizable							
391.00 Office Furniture							
391.10 Office Equipment							
391.20 Duplicating Equipment							
391.50 Computer Systems							
391.60 Computer Related Equipment							
394.00 Tools, Shop and Garage Equipment							
394.20 Automated Meter Reading Equipment							
397.00 Communication Equipment							
397.10 Radio Telecommunication Equipment							
397.20 Microwave Equipment							
397.30 Radio Load Control Equipment							
Total Amortizable			10.90%	4.03		52.07%	10.90%
Total General Plant			4.65%	10.63	16.1%	40.17%	4.64%
TOTAL UTILITY			2.49%	28.25	-14.0%	34.89%	2.67%
STEAM PRODUCTION							
Big Stone							
311.00 Structures and Improvements	25.60	-5.7%	2.77%	24.66	-5.8%	37.07%	2.79%
312.00 Boiler Plant Equipment	25.60	-5.7%	3.34%	24.67	-5.8%	21.49%	3.42%
312.10 Boiler Plant Equipment - Landfill							
314.00 Turbogenerator Units	25.58	-5.7%	1.67%	24.64	-5.8%	64.32%	1.68%
315.00 Accessory Electric Equipment	25.59	-5.7%	2.51%	24.66	-5.8%	44.00%	2.51%
316.00 Miscellaneous Power Plant Equipment	25.59	-5.7%	2.50%	24.65	-5.8%	43.27%	2.54%
Total Big Stone			2.99%	24.66	-5.8%	30.86%	3.04%

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

Account Description	Current			Updated			
	Rem. Life	Fut. Net Salvage	Accrual Rate	Rem. Life	Fut. Net Salvage	Reserve Ratio	Accrual Rate
A	B	C	D	E	F	G	H
Hoot Lake Units 2 and 3							
311.00 Structures and Improvements	1.50	-18.9%	7.45%	1.00	-18.9%	113.01%	5.89%
312.00 Boiler Plant Equipment	1.50	-18.9%	14.73%	1.00	-18.9%	109.42%	9.48%
312.10 Boiler Plant Equipment - Landfill	30.24		2.25%	29.32		34.29%	2.24%
314.00 Turbogenerator Units	1.50	-18.9%	9.75%	1.00	-18.9%	111.87%	7.03%
315.00 Accessory Electric Equipment	1.50	-18.9%	8.91%	1.00	-18.9%	112.29%	6.61%
316.00 Miscellaneous Power Plant Equipment	1.50	-18.9%	15.71%	1.00	-18.9%	108.94%	9.96%
Total Hoot Lake Units 2 and 3			11.20%	3.18	-16.1%	99.05%	7.58%
Coyote							
311.00 Structures and Improvements	20.87	-8.6%	1.66%	19.93	-8.7%	75.62%	1.66%
312.00 Boiler Plant Equipment	20.89	-8.6%	2.31%	19.94	-8.7%	61.23%	2.38%
312.10 Boiler Plant Equipment - Landfill							
314.00 Turbogenerator Units	20.89	-8.6%	2.48%	19.95	-8.7%	57.57%	2.56%
315.00 Accessory Electric Equipment	20.88	-8.6%	1.79%	19.93	-8.7%	72.94%	1.79%
316.00 Miscellaneous Power Plant Equipment	20.90	-8.6%	2.90%	19.95	-8.7%	44.62%	3.21%
Total Coyote			2.18%	19.94	-8.7%	64.11%	2.24%
HYDRAULIC PRODUCTION							
Hoot Lake							
331.00 Structures and Improvements	1.50		0.39%	38.04		99.81%	
332.00 Reservoirs, Dams and Waterways	1.50		3.45%	38.16		98.30%	0.04%
333.00 Water Wheels, Turbines & Generators	1.50		2.35%	38.24		98.84%	0.03%
334.00 Accessory Electric Equipment	1.50		3.23%	38.27		98.41%	0.04%
335.00 Miscellaneous Power Plant Equipment	1.50		18.34%	38.41		90.95%	0.24%
Total Hoot Lake			4.16%	38.21		97.95%	0.05%
Wright							
331.00 Structures and Improvements	1.50		4.87%	38.23		97.60%	0.06%
332.00 Reservoirs, Dams and Waterways	1.50		16.51%	38.37		91.85%	0.21%
333.00 Water Wheels, Turbines & Generators	1.50		6.11%	38.39		96.98%	0.08%
334.00 Accessory Electric Equipment	1.50		8.90%	38.35		95.61%	0.11%
335.00 Miscellaneous Power Plant Equipment	1.50		13.27%	38.37		93.46%	0.17%
Total Wright			12.11%	38.37		94.02%	0.15%
Pisgah							
331.00 Structures and Improvements	1.50		3.89%	38.19		98.08%	0.05%
332.00 Reservoirs, Dams and Waterways	1.50		12.61%	38.44		11.55%	2.30%
333.00 Water Wheels, Turbines & Generators	1.50		10.84%	38.36		94.65%	0.14%
334.00 Accessory Electric Equipment	1.50		10.22%	38.36		94.96%	0.13%
335.00 Miscellaneous Power Plant Equipment	1.50		19.27%	38.41		90.50%	0.25%
Total Pisgah			12.55%	38.43		19.75%	2.09%
Dayton Hollow							
331.00 Structures and Improvements	1.50		17.04%	38.40		91.60%	0.22%
332.00 Reservoirs, Dams and Waterways	1.50		16.65%	38.40		65.21%	0.91%
333.00 Water Wheels, Turbines & Generators	1.50		10.68%	38.36		94.73%	0.14%
334.00 Accessory Electric Equipment	1.50		7.44%	38.33		96.33%	0.10%
335.00 Miscellaneous Power Plant Equipment	1.50		17.75%	38.41		91.24%	0.23%
Total Dayton Hollow			15.38%	38.39		71.99%	0.73%
Taplin Gorge							
331.00 Structures and Improvements	1.50		1.48%	37.95		99.27%	0.02%
332.00 Reservoirs, Dams and Waterways	1.50		10.11%	38.30		95.01%	0.13%
333.00 Water Wheels, Turbines & Generators	1.50		1.28%	37.92		99.37%	0.02%
334.00 Accessory Electric Equipment	1.50		6.50%	38.30		96.79%	0.08%
335.00 Miscellaneous Power Plant Equipment	1.50		13.77%	38.38		93.21%	0.18%
Total Taplin Gorge			9.74%	38.30		95.19%	0.13%

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

Account Description	Current			Updated			
	Rem. Life	Fut. Net Salvage	Accrual Rate	Rem. Life	Fut. Net Salvage	Reserve Ratio	Accrual Rate
A	B	C	D	E	F	G	H
Bemidji							
331.00 Structures and Improvements	1.50		12.74%	38.38		93.72%	0.16%
332.00 Reservoirs, Dams and Waterways	1.50		13.58%	38.36		91.35%	0.23%
333.00 Water Wheels, Turbines & Generators	1.50		9.43%	38.33		95.40%	0.12%
334.00 Accessory Electric Equipment	1.50		9.39%	37.98		95.37%	0.12%
335.00 Miscellaneous Power Plant Equipment	1.50		15.76%	38.39		92.22%	0.20%
Total Bemidji			12.46%	38.36		92.67%	0.19%
OTHER PRODUCTION							
Jamestown							
341.00 Structures and Improvements	13.26	-5.9%	2.10%	12.29	-5.9%	80.08%	2.10%
342.00 Fuel Holders and Accessories	13.26	-5.9%	2.91%	12.30	-5.9%	70.04%	2.91%
343.00 Prime Movers	13.25	-5.9%	1.71%	12.29	-5.9%	84.74%	1.72%
344.00 Generators							
345.00 Accessory Electric Equipment	13.26	-5.9%	2.60%	12.29	-5.9%	73.86%	2.60%
346.00 Miscellaneous Power Plant Equipment	13.27	-5.9%	3.57%	12.30	-5.9%	61.82%	3.59%
Total Jamestown			1.84%	12.29	-5.8%	83.23%	1.84%
Jamestown Unit 1							
341.00 Structures and Improvements	13.26	-5.9%	2.01%	12.29	-5.9%	81.15%	2.01%
342.00 Fuel Holders and Accessories	13.26	-5.9%	3.06%	12.30	-5.9%	68.22%	3.06%
343.00 Prime Movers	13.26	-5.9%	1.98%	12.29	-5.9%	81.46%	1.99%
344.00 Generators							
345.00 Accessory Electric Equipment	13.24	-5.9%	1.80%	12.28	-5.8%	83.80%	1.79%
346.00 Miscellaneous Power Plant Equipment	13.27	-5.9%	3.71%	12.30	-5.9%	60.08%	3.73%
Total Jamestown Unit 1			2.12%	12.29	-5.9%	79.79%	2.12%
Jamestown Unit 2							
341.00 Structures and Improvements	13.26	-5.9%	3.10%	12.30	-5.9%	67.75%	3.10%
342.00 Fuel Holders and Accessories	13.25	-5.9%	1.38%	12.28	-5.8%	88.87%	1.38%
343.00 Prime Movers	13.25	-5.9%	1.51%	12.29	-5.8%	87.29%	1.51%
344.00 Generators							
345.00 Accessory Electric Equipment	13.27	-5.9%	4.33%	12.30	-5.9%	52.50%	4.34%
346.00 Miscellaneous Power Plant Equipment	13.25	-5.9%	-0.19%	12.29	-5.9%	108.20%	-0.19%
Total Jamestown Unit 2			1.57%	12.29	-5.8%	86.58%	1.57%
Lake Preston							
341.00 Structures and Improvements	13.25	-6.9%	1.63%	12.29	-6.9%	86.88%	1.63%
342.00 Fuel Holders and Accessories	13.25	-6.9%	1.75%	12.29	-6.9%	85.31%	1.76%
343.00 Prime Movers	13.25	-6.9%	1.58%	12.29	-6.9%	87.48%	1.58%
344.00 Generators							
345.00 Accessory Electric Equipment	13.25	-6.9%	1.64%	12.29	-6.9%	86.64%	1.65%
346.00 Miscellaneous Power Plant Equipment	13.25	-6.9%	0.99%	12.28	-6.9%	94.75%	0.99%
Total Lake Preston			1.60%	12.29	-6.9%	87.24%	1.60%
Solway Combustion Turbine							
341.00 Structures and Improvements	18.06	-1.6%	3.23%	17.10	-1.6%	46.31%	3.23%
342.00 Fuel Holders and Accessories	18.06	-1.6%	3.22%	17.10	-1.6%	46.56%	3.22%
343.00 Prime Movers	18.06	-1.6%	3.91%	17.10	-1.6%	34.62%	3.92%
344.00 Generators							
345.00 Accessory Electric Equipment	18.06	-1.6%	3.20%	17.10	-1.6%	46.76%	3.21%
346.00 Miscellaneous Power Plant Equipment	18.06	-1.6%	3.47%	17.10	-1.6%	42.15%	3.48%
Total Solway Combustion Turbine			3.73%	17.10	-1.6%	37.71%	3.74%

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

Account Description A	Current			Updated			
	Rem. Life B	Fut. Net Salvage C	Accrual Rate D	Rem. Life E	Fut. Net Salvage F	Reserve Ratio G	Accrual Rate H
Fergus Falls Control Center							
341.00 Structures and Improvements							
342.00 Fuel Holders and Accessories							
343.00 Prime Movers	10.35	-5.0%	3.53%	9.38	-5.0%	71.67%	3.55%
344.00 Generators							
345.00 Accessory Electric Equipment							
346.00 Miscellaneous Power Plant Equipment							
Total Fergus Falls Control Center			3.53%	9.38	-5.0%	71.67%	3.55%
WIND PRODUCTION							
Ashtabula							
341.00 Structures and Improvements	22.79	-4.3%	2.63%	21.85	-4.3%	48.48%	2.55%
344.00 Generators	22.79	-4.3%	2.71%	21.85	-4.3%	46.74%	2.63%
345.00 Accessory Electric Equipment	22.79	-4.3%	2.67%	21.85	-4.3%	47.67%	2.59%
346.00 Miscellaneous Power Plant Equipment	22.80	-4.3%	3.12%	21.87	-4.2%	-6.51%	5.06%
Total Ashtabula			2.71%	21.85	-4.3%	46.78%	2.63%
Langdon							
341.00 Structures and Improvements	21.85	-5.0%	2.60%	20.90	-4.9%	52.34%	2.51%
344.00 Generators	21.85	-5.0%	2.68%	20.90	-4.9%	49.54%	2.65%
345.00 Accessory Electric Equipment	21.85	-5.0%	2.65%	20.90	-4.9%	51.40%	2.56%
346.00 Miscellaneous Power Plant Equipment	21.86	-5.0%	3.84%	20.92	-4.9%	1.82%	4.93%
Total Langdon			2.68%	20.90	-4.9%	49.71%	2.64%
Luverne							
341.00 Structures and Improvements	23.73	-7.2%	2.78%	22.79	-7.1%	45.53%	2.70%
344.00 Generators	23.73	-7.2%	2.87%	22.79	-7.1%	42.30%	2.84%
345.00 Accessory Electric Equipment	23.73	-7.2%	2.78%	22.79	-7.1%	45.50%	2.70%
346.00 Miscellaneous Power Plant Equipment	23.74	-7.2%	3.25%	22.81	-7.1%	3.09%	4.56%
Total Luverne			2.86%	22.79	-7.1%	42.52%	2.83%
Merricourt							
341.00 Structures and Improvements				33.01	-5.0%	0.19%	3.18%
344.00 Generators				33.01	-5.0%	0.19%	3.18%
345.00 Accessory Electric Equipment				33.01	-5.0%	0.19%	3.18%
346.00 Miscellaneous Power Plant Equipment							
Total Merricourt				33.01	-5.0%	0.19%	3.18%
SOLAR PRODUCTION							
Jamestown							
343.00 Prime Movers			4.04%	22.81	-1.0%	3.39%	4.28%
Total Jamestown			4.04%	22.81	-1.0%	3.39%	4.28%
Rush Lake							
343.00 Prime Movers			4.04%	23.75	-1.0%	1.13%	4.21%
Total Rush Lake			4.04%	23.75	-1.0%	1.13%	4.21%

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

Account Description	12/31/20 Plant Investment	Minnesota Allocation Factor	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total	Minnesota	Total	Minnesota	Total	Minnesota
A	B	C	D	E=C*D	F	G=C*F	H=F-D	I=G-E
INTANGIBLE PLANT								
303.91 Software - 5 Year	\$ 5,848,316	0.49198433	\$ 1,169,663	\$ 575,456	\$ 1,169,663	\$ 575,456	\$ -	\$ -
303.92 Software - 10 Year	20,179,746	0.49198433	2,017,975	992,812	2,017,975	992,812		
Total Intangible Plant	\$ 26,028,062		\$ 3,187,638	\$ 1,568,268	\$ 3,187,638	\$ 1,568,268	\$ -	\$ -
STEAM PRODUCTION								
311.00 Structures and Improvements	\$ 121,217,007	0.54455357	\$ 3,256,790	\$ 1,773,497	\$ 3,177,754	\$ 1,730,457	\$ (79,036)	\$ (43,040)
312.00 Boiler Plant Equipment	339,466,251	0.54455357	14,552,480	7,924,606	12,797,043	6,968,675	(1,755,437)	(955,931)
312.10 Boiler Plant Equipment - Landfill	10,412,772	0.54455357	234,287	127,582	233,246	127,015	(1,041)	(567)
314.00 Turbogenerator Units	65,901,519	0.54455357	2,228,668	1,213,629	1,936,481	1,054,517	(292,187)	(159,112)
315.00 Accessory Electric Equipment	35,770,319	0.54455357	987,497	537,744	923,863	503,092	(63,634)	(34,652)
316.00 Miscellaneous Power Plant Equipment	6,791,188	0.54455357	336,076	183,011	276,024	150,309	(60,052)	(32,702)
Total Steam Production Plant	\$ 579,559,056		\$ 21,595,798	\$ 11,760,069	\$ 19,344,411	\$ 10,534,065	\$ (2,251,387)	\$ (1,226,004)
HYDRAULIC PRODUCTION								
331.00 Structures and Improvements	\$ 351,712	0.54455357	\$ 30,415	\$ 16,563	\$ 380	\$ 207	\$ (30,035)	\$ (16,356)
332.00 Reservoirs, Dams and Waterways	7,500,256	0.54455357	1,019,786	555,329	91,503	49,829	(928,283)	(505,500)
333.00 Water Wheels, Turbines & Generators	1,373,867	0.54455357	107,926	58,771	1,398	762	(106,528)	(58,009)
334.00 Accessory Electric Equipment	597,103	0.54455357	48,325	26,315	616	335	(47,709)	(25,980)
335.00 Miscellaneous Power Plant Equipment	435,295	0.54455357	69,491	37,842	901	490	(68,590)	(37,352)
Total Hydraulic Production Plant	\$ 10,258,233		\$ 1,275,943	\$ 694,820	\$ 94,798	\$ 51,623	\$ (1,181,145)	\$ (643,197)
OTHER PRODUCTION								
341.00 Structures and Improvements	\$ 5,336,904	0.54455357	\$ 165,109	\$ 89,911	\$ 165,109	\$ 89,911	\$ -	\$ -
342.00 Fuel Holders and Accessories	1,764,466	0.54455357	50,699	27,608	50,732	27,626	33	18
343.00 Prime Movers	31,398,808	0.54455357	996,344	542,563	998,822	543,912	2,478	1,349
344.00 Generators								
345.00 Accessory Electric Equipment	1,937,877	0.54455357	54,414	29,631	54,577	29,719	163	88
346.00 Miscellaneous Power Plant Equipment	428,921	0.54455357	14,436	7,862	14,485	7,889	49	27
Total Other Production Plant	\$ 40,866,976		\$ 1,281,002	\$ 697,575	\$ 1,283,725	\$ 699,057	\$ 2,723	\$ 1,482
WIND PRODUCTION								
341.00 Structures and Improvements	\$ 15,463,308	0.54351107	\$ 213,027	\$ 115,782	\$ 443,746	\$ 241,182	\$ 230,719	\$ 125,400
344.00 Generators	467,617,122	0.54351107	6,690,121	3,636,155	13,684,522	7,437,689	6,994,401	3,801,534
345.00 Accessory Electric Equipment	36,167,744	0.54351107	504,518	274,211	1,042,632	566,682	538,114	292,471
346.00 Miscellaneous Power Plant Equipment	438,269	0.54351107	14,985	8,145	21,155	11,498	6,170	3,353
Total Wind Production Plant	\$ 519,686,443		\$ 7,422,651	\$ 4,034,293	\$ 15,192,055	\$ 8,257,051	\$ 7,769,404	\$ 4,222,758
SOLAR PRODUCTION								
343.00 Prime Movers	\$ 313,436	0.54351107	\$ 12,663	\$ 6,882	\$ 13,307	\$ 7,233	\$ 644	\$ 351
Total Solar Production Plant	\$ 313,436		\$ 12,663	\$ 6,882	\$ 13,307	\$ 7,233	\$ 644	\$ 351

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

Account Description	12/31/20 Plant Investment	Minnesota Allocation Factor	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total	Minnesota	Total	Minnesota	Total	Minnesota
A	B	C	D	E=C*D	F	G=C*F	H=F-D	I=G-E
TRANSMISSION PLANT								
353.00 Station Equipment	\$ 162,264,161	0.51284880	\$ 2,547,547	\$ 1,306,506	\$ 2,515,094	\$ 1,289,863	\$ (32,453)	\$ (16,643)
354.00 Towers and Fixtures	191,081,948	0.51284880	2,789,796	1,430,744	2,789,796	1,430,744		
355.00 Poles and Fixtures	147,132,677	0.51284880	2,707,241	1,388,405	2,721,955	1,395,951	14,714	7,546
356.00 Overhead Conductors and Devices	171,989,284	0.51284880	2,820,624	1,446,554	2,786,226	1,428,913	(34,398)	(17,641)
358.00 Underground Conductors and Devices	77,461	0.51284880	480	246	485	238	(15)	(8)
Total Transmission Plant	\$ 672,545,531		\$ 10,865,688	\$ 5,572,455	\$ 10,813,536	\$ 5,545,709	\$ (52,152)	\$ (26,746)
DISTRIBUTION PLANT								
362.00 Station Equipment	\$ 89,667,123	0.43891607	\$ 1,757,476	\$ 771,384	\$ 1,730,575	\$ 759,577	\$ (26,901)	\$ (11,807)
364.00 Poles, Towers and Fixtures	79,123,058	0.43891607	2,302,481	1,010,596	2,302,481	1,010,596		
365.00 Overhead Conductors and Devices	56,852,617	0.43891607	1,279,184	561,454	1,296,240	568,941	17,056	7,487
367.00 Underground Conductors and Devices	92,508,809	0.43891607	1,887,180	828,314	1,914,932	840,494	27,752	12,180
368.00 Line Transformers	112,721,811	0.43891607	1,995,176	875,715	1,972,632	865,820	(22,544)	(9,895)
369.00 Overhead Services	13,652,260	0.43891607	806,849	354,139	804,118	352,940	(2,731)	(1,199)
369.10 Underground Services	46,383,443	0.43891607	1,038,989	456,029	1,043,627	458,065	4,638	2,036
370.00 Meters	27,268,533	0.43891607	913,496	400,948	918,950	403,342	5,454	2,394
370.05 Smart Meters	921,313	0.43891607	47,263	20,744	47,540	20,866	277	122
370.10 Load Management Switches	8,899,439	0.43891607	154,850	67,966	121,032	53,123	(33,818)	(14,843)
371.20 Other Private Lighting	7,107,183	0.43891607	256,569	112,612	265,809	116,668	9,240	4,056
373.00 Street Lighting and Signal Systems	9,509,826	0.43891607	389,903	171,135	428,893	188,248	38,990	17,113
Total Distribution Plant	\$ 544,615,415		\$ 12,829,416	\$ 5,631,036	\$ 12,846,829	\$ 5,638,680	\$ 17,413	\$ 7,644
GENERAL PLANT								
Depreciable								
390.00 Structures and Improvements	\$ 20,656,074	0.49198433	\$ 392,465	\$ 193,087	\$ 388,334	\$ 191,054	\$ (4,131)	\$ (2,033)
390.10 General Office Buildings	6,379,788	0.49198433	51,676	25,424	51,676	25,424		
390.20 Fleet Service Center Building	3,133,344	0.49198433	18,800	9,249	15,353	7,553	(3,447)	(1,696)
390.30 Central Stores Building	4,276,593	0.49198433	(23,094)	(11,362)	(22,666)	(11,151)	428	211
396.00 Power Operated Equipment	1,430,267	0.49198433	58,212	28,639	57,211	28,147	(1,001)	(492)
397.40 Communication Towers	1,877,722	0.49198433	32,109	15,797	31,921	15,705	(188)	(92)
Total Depreciable	\$ 37,753,788		\$ 530,168	\$ 260,834	\$ 521,829	\$ 256,732	\$ (8,339)	\$ (4,102)

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

Account Description A	12/31/20 Plant Investment B	Minnesota Allocation Factor C	Current Annual Accrual		Updated Annual Accrual		Difference		
			Total D	Minnesota E=C*D	Total F	Minnesota G=C*F	Total H=F-D	Minnesota I=G-E	
Amortizable									
391.00 Office Furniture	\$ 703,063	0.49198433	\$ 46,894	\$ 23,071	\$ 46,894	\$ 23,071	\$ -	\$ -	
391.10 Office Equipment	374,681	0.49198433	37,468	18,434	37,468	18,434			
391.20 Duplicating Equipment	239,837	0.49198433	23,984	11,800	23,984	11,800			
391.50 Computer Systems	3,706,467	0.49198433	741,293	364,705	741,293	364,705			
391.60 Computer Related Equipment	2,075,789	0.49198433	415,158	204,251	415,158	204,251			
394.00 Tools, Shop and Garage Equipment	4,147,732	0.49198433	276,654	136,109	276,654	136,109			
394.20 Automated Meter Reading Equipment	950,669	0.49198433	63,410	31,197	63,410	31,197			
397.00 Communication Equipment	2,965,064	0.49198433	197,770	97,300	197,770	97,300			
397.10 Radio Telecommunication Equipment	693,083	0.49198433	69,308	34,098	69,308	34,098			
397.20 Microwave Equipment	3,276,047	0.49198433	218,512	107,504	218,512	107,504			
397.30 Radio Load Control Equipment	459,343	0.49198433	45,934	22,599	45,934	22,599			
Total Amortizable	\$ 19,591,775		\$ 2,136,385	\$ 1,051,068	\$ 2,136,385	\$ 1,051,068	\$ -	\$ -	
Total General Plant	\$ 57,345,563		\$ 2,666,553	\$ 1,311,902	\$ 2,658,214	\$ 1,307,800	\$ (8,339)	\$ (4,102)	
TOTAL UTILITY	\$ 2,451,218,715		\$ 61,137,352	\$ 31,277,300	\$ 65,434,513	\$ 33,609,486	\$ 4,297,161	\$ 2,332,186	
STEAM PRODUCTION									
Big Stone									
311.00 Structures and Improvements	\$ 80,325,431	0.54455357	\$ 2,225,014	\$ 1,211,639	\$ 2,241,080	\$ 1,220,388	\$ 16,066	\$ 8,749	
312.00 Boiler Plant Equipment	195,361,279	0.54455357	6,525,067	3,553,249	6,681,356	3,638,356	156,289	85,107	
312.10 Boiler Plant Equipment - Landfill									
314.00 Turbogenerator Units	30,372,433	0.54455357	507,220	276,208	510,257	277,862	3,037	1,654	
315.00 Accessory Electric Equipment	20,863,979	0.54455357	523,686	285,175	523,686	285,175			
316.00 Miscellaneous Power Plant Equipment	3,328,474	0.54455357	83,212	45,313	84,543	46,038	1,331	725	
Total Big Stone	\$ 330,251,596		\$ 9,864,199	\$ 5,371,584	\$ 10,040,922	\$ 5,467,819	\$ 176,723	\$ 96,235	
Hoot Lake Units 2 and 3									
311.00 Structures and Improvements	\$ 6,096,309	0.54455357	\$ 454,175	\$ 247,323	\$ 359,073	\$ 195,534	\$ (95,102)	\$ (51,789)	
312.00 Boiler Plant Equipment	37,830,819	0.54455357	5,572,480	3,034,514	3,586,362	1,952,966	(1,986,118)	(1,081,548)	
312.10 Boiler Plant Equipment - Landfill	10,412,772	0.54455357	234,287	127,582	233,246	127,015	(1,041)	(567)	
314.00 Turbogenerator Units	11,558,817	0.54455357	1,126,985	613,704	812,585	442,496	(314,400)	(171,208)	
315.00 Accessory Electric Equipment	2,766,673	0.54455357	246,511	134,238	182,877	99,586	(63,634)	(34,652)	
316.00 Miscellaneous Power Plant Equipment	1,190,054	0.54455357	186,957	101,808	118,529	64,545	(68,428)	(37,263)	
Total Hoot Lake Units 2 and 3	\$ 69,855,444		\$ 7,821,395	\$ 4,259,169	\$ 5,292,672	\$ 2,882,142	\$ (2,528,723)	\$ (1,377,027)	

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

Account Description	12/31/20 Plant Investment	Minnesota Allocation Factor	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total	Minnesota	Total	Minnesota	Total	Minnesota
A	B	C	D	E=C*D	F	G=C*F	H=F-D	I=G-E
Coyote								
311.00 Structures and Improvements	\$ 34,795,267	0.54455357	\$ 577,601	\$ 314,535	\$ 577,601	\$ 314,535	\$ -	\$ -
312.00 Boiler Plant Equipment	106,274,153	0.54455357	2,454,933	1,336,843	2,529,325	1,377,353	74,392	40,510
312.10 Boiler Plant Equipment - Landfill		0.54455357						
314.00 Turbogenerator Units	23,970,269	0.54455357	594,463	323,717	613,639	334,159	19,176	10,442
315.00 Accessory Electric Equipment	12,139,667	0.54455357	217,300	118,331	217,300	118,331		
316.00 Miscellaneous Power Plant Equipment	2,272,660	0.54455357	65,907	35,890	72,952	39,726	7,045	3,836
Total Coyote	\$ 179,452,016		\$ 3,910,204	\$ 2,129,316	\$ 4,010,817	\$ 2,184,104	\$ 100,613	\$ 54,788
HYDRAULIC PRODUCTION								
Hoot Lake								
331.00 Structures and Improvements	\$ 69,354	0.54455357	\$ 270	\$ 147	\$ -	\$ -	\$ (270)	\$ (147)
332.00 Reservoirs, Dams and Waterways	297,674	0.54455357	10,270	5,593	119	65	(10,151)	(5,528)
333.00 Water Wheels, Turbines & Generators	104,195	0.54455357	2,449	1,334	31	17	(2,418)	(1,317)
334.00 Accessory Electric Equipment	34,651	0.54455357	1,119	609	14	8	(1,105)	(601)
335.00 Miscellaneous Power Plant Equipment	48,801	0.54455357	8,950	4,874	117	64	(8,833)	(4,810)
Total Hoot Lake	\$ 554,675		\$ 23,058	\$ 12,557	\$ 281	\$ 154	\$ (22,777)	\$ (12,403)
Wright								
331.00 Structures and Improvements	\$ 19,026	0.54455357	\$ 927	\$ 505	\$ 11	\$ 6	\$ (916)	\$ (499)
332.00 Reservoirs, Dams and Waterways	892,711	0.54455357	147,387	80,260	1,875	1,021	(145,512)	(79,239)
333.00 Water Wheels, Turbines & Generators	545,392	0.54455357	33,323	18,146	436	237	(32,887)	(17,909)
334.00 Accessory Electric Equipment	202,552	0.54455357	18,027	9,817	223	121	(17,804)	(9,696)
335.00 Miscellaneous Power Plant Equipment	115,218	0.54455357	15,289	8,326	196	107	(15,093)	(8,219)
Total Wright	\$ 1,774,899		\$ 214,953	\$ 117,054	\$ 2,741	\$ 1,492	\$ (212,212)	\$ (115,562)
Pisgah								
331.00 Structures and Improvements	\$ 12,118	0.54455357	\$ 471	\$ 256	\$ 6	\$ 3	\$ (465)	\$ (253)
332.00 Reservoirs, Dams and Waterways	3,054,986	0.54455357	385,234	209,781	70,265	38,263	(314,969)	(171,518)
333.00 Water Wheels, Turbines & Generators	159,732	0.54455357	17,315	9,429	224	122	(17,091)	(9,307)
334.00 Accessory Electric Equipment	102,487	0.54455357	10,474	5,704	133	72	(10,341)	(5,632)
335.00 Miscellaneous Power Plant Equipment	62,744	0.54455357	12,091	6,584	157	85	(11,934)	(6,499)
Total Pisgah	\$ 3,392,067		\$ 425,585	\$ 231,754	\$ 70,785	\$ 38,545	\$ (354,800)	\$ (193,209)
Dayton Hollow								
331.00 Structures and Improvements	\$ 16,269	0.54455357	\$ 2,772	\$ 1,510	\$ 36	\$ 20	\$ (2,736)	\$ (1,490)
332.00 Reservoirs, Dams and Waterways	1,817,534	0.54455357	302,619	164,792	16,540	9,007	(286,079)	(155,785)
333.00 Water Wheels, Turbines & Generators	226,751	0.54455357	24,217	13,187	317	173	(23,900)	(13,014)
334.00 Accessory Electric Equipment	193,342	0.54455357	14,385	7,833	193	105	(14,192)	(7,728)
335.00 Miscellaneous Power Plant Equipment	111,159	0.54455357	19,731	10,745	256	139	(19,475)	(10,606)
Total Dayton Hollow	\$ 2,365,055		\$ 363,724	\$ 198,067	\$ 17,342	\$ 9,444	\$ (346,382)	\$ (188,623)

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

Account Description	12/31/20 Plant Investment	Minnesota Allocation Factor	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total	Minnesota	Total	Minnesota	Total	Minnesota
A	B	C	D	E=C*D	F	G=C*F	H=F-D	I=G-E
Taplin Gorge								
331.00 Structures and Improvements	\$ 35,140	0.54455357	\$ 520	\$ 283	\$ 7	\$ 4	\$ (513)	\$ (279)
332.00 Reservoirs, Dams and Waterways	602,762	0.54455357	60,939	33,185	784	427	(60,155)	(32,758)
333.00 Water Wheels, Turbines & Generators	15,110	0.54455357	193	105	3	2	(190)	(103)
334.00 Accessory Electric Equipment	58,695	0.54455357	3,815	2,077	47	26	(3,768)	(2,051)
335.00 Miscellaneous Power Plant Equipment	96,303	0.54455357	13,261	7,221	173	94	(13,088)	(7,127)
Total Taplin Gorge	\$ 808,010		\$ 78,728	\$ 42,871	\$ 1,014	\$ 553	\$ (77,714)	\$ (42,318)
Bemidji								
331.00 Structures and Improvements	\$ 199,805	0.54455357	\$ 25,455	\$ 13,862	\$ 320	\$ 174	\$ (25,135)	\$ (13,688)
332.00 Reservoirs, Dams and Waterways	834,589	0.54455357	113,337	61,718	1,920	1,046	(111,417)	(60,672)
333.00 Water Wheels, Turbines & Generators	322,687	0.54455357	30,429	16,570	387	211	(30,042)	(16,359)
334.00 Accessory Electric Equipment	5,376	0.54455357	505	275	6	3	(499)	(272)
335.00 Miscellaneous Power Plant Equipment	1,070	0.54455357	169	92	2	1	(167)	(91)
Total Bemidji	\$ 1,363,527		\$ 169,895	\$ 92,517	\$ 2,635	\$ 1,435	\$ (167,260)	\$ (91,082)
OTHER PRODUCTION								
Jamestown								
341.00 Structures and Improvements	\$ 311,512	0.54455357	\$ 6,532	\$ 3,557	\$ 6,532	\$ 3,557	\$ -	\$ -
342.00 Fuel Holders and Accessories	415,964	0.54455357	12,110	6,594	12,110	6,594		
343.00 Prime Movers	6,952,527	0.54455357	119,228	64,926	119,531	65,091	303	165
344.00 Generators		0.54455357						
345.00 Accessory Electric Equipment	227,590	0.54455357	5,926	3,227	5,918	3,222	(8)	(5)
346.00 Miscellaneous Power Plant Equipment	88,665	0.54455357	3,165	1,724	3,182	1,733	17	9
Total Jamestown	\$ 7,996,258		\$ 146,961	\$ 80,028	\$ 147,273	\$ 80,197	\$ 312	\$ 169
Jamestown Unit 1								
341.00 Structures and Improvements	\$ 286,659	0.54455357	\$ 5,762	\$ 3,138	\$ 5,762	\$ 3,138	\$ -	\$ -
342.00 Fuel Holders and Accessories	379,195	0.54455357	11,603	6,318	11,603	6,318		
343.00 Prime Movers	3,030,866	0.54455357	60,011	32,679	60,314	32,844	303	165
344.00 Generators		0.54455357						
345.00 Accessory Electric Equipment	155,272	0.54455357	2,795	1,522	2,779	1,513	(16)	(9)
346.00 Miscellaneous Power Plant Equipment	85,462	0.54455357	3,171	1,727	3,188	1,736	17	9
Total Jamestown Unit 1	\$ 3,937,454		\$ 83,342	\$ 45,384	\$ 83,646	\$ 45,549	\$ 304	\$ 165
Jamestown Unit 2								
341.00 Structures and Improvements	\$ 24,853	0.54455357	\$ 770	\$ 419	\$ 770	\$ 419	\$ -	\$ -
342.00 Fuel Holders and Accessories	36,769	0.54455357	507	276	507	276		
343.00 Prime Movers	3,921,661	0.54455357	59,217	32,247	59,217	32,247		
344.00 Generators		0.54455357						
345.00 Accessory Electric Equipment	72,318	0.54455357	3,131	1,705	3,139	1,709	8	4
346.00 Miscellaneous Power Plant Equipment	3,203	0.54455357	(6)	(3)	(6)	(3)		
Total Jamestown Unit 2	\$ 4,058,804		\$ 63,619	\$ 34,644	\$ 63,627	\$ 34,648	\$ 8	\$ 4

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

Account Description	12/31/20 Plant Investment	Minnesota Allocation Factor	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total	Minnesota	Total	Minnesota	Total	Minnesota
A	B	C	D	E-C'D	F	G-C'F	H-F-D	I-G-E
Lake Preston								
341.00 Structures and Improvements	\$ 233,982	0.54455357	\$ 3,814	\$ 2,077	\$ 3,814	\$ 2,077	\$ -	\$ -
342.00 Fuel Holders and Accessories	328,705	0.54455357	5,752	3,132	5,785	3,150	33	18
343.00 Prime Movers	3,282,642	0.54455357	51,866	28,244	51,866	28,244		
344.00 Generators		0.54455357						
345.00 Accessory Electric Equipment	400,094	0.54455357	6,562	3,573	6,602	3,595	40	22
346.00 Miscellaneous Power Plant Equipment	21,607	0.54455357	214	117	214	117		
Total Lake Preston	\$ 4,267,030		\$ 68,208	\$ 37,143	\$ 68,281	\$ 37,183	\$ 73	\$ 40
Solway Combustion Turbine								
341.00 Structures and Improvements	\$ 4,791,410	0.54455357	\$ 154,763	\$ 84,277	\$ 154,763	\$ 84,277	\$ -	\$ -
342.00 Fuel Holders and Accessories	1,019,797	0.54455357	32,837	17,882	32,837	17,882		
343.00 Prime Movers	20,572,001	0.54455357	804,365	438,020	806,422	439,140	2,057	1,120
344.00 Generators								
345.00 Accessory Electric Equipment	1,310,193	0.54455357	41,926	22,831	42,057	22,902	131	71
346.00 Miscellaneous Power Plant Equipment	318,649	0.54455357	11,057	6,021	11,089	6,039	32	18
Total Solway Combustion Turbine	\$ 28,012,050		\$ 1,044,948	\$ 569,031	\$ 1,047,168	\$ 570,240	\$ 2,220	\$ 1,209
Fergus Falls Control Center								
341.00 Structures and Improvements	\$ -		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
342.00 Fuel Holders and Accessories								
343.00 Prime Movers	591,638	0.54455357	20,885	11,373	21,003	11,437	118	64
344.00 Generators								
345.00 Accessory Electric Equipment								
346.00 Miscellaneous Power Plant Equipment								
Total Fergus Falls Control Center	\$ 591,638		\$ 20,885	\$ 11,373	\$ 21,003	\$ 11,437	\$ 118	\$ 64
WIND PRODUCTION								
Ashtabula								
341.00 Structures and Improvements	\$ 3,248,290	0.54351107	\$ 85,430	\$ 46,432	\$ 82,831	\$ 45,020	\$ (2,599)	\$ (1,412)
344.00 Generators	107,003,265	0.54351107	2,899,788	1,576,067	2,814,186	1,529,541	(85,602)	(46,526)
345.00 Accessory Electric Equipment	6,479,774	0.54351107	173,010	94,033	167,826	91,215	(5,184)	(2,818)
346.00 Miscellaneous Power Plant Equipment	121,175	0.54351107	3,781	2,055	6,131	3,332	2,350	1,277
Total Ashtabula	\$ 116,852,504		\$ 3,162,009	\$ 1,718,587	\$ 3,070,974	\$ 1,669,108	\$ (91,035)	\$ (49,479)
Langdon								
341.00 Structures and Improvements	\$ 2,484,069	0.54351107	\$ 64,586	\$ 35,103	\$ 62,350	\$ 33,888	\$ (2,236)	\$ (1,215)
344.00 Generators	69,717,721	0.54351107	1,868,435	1,015,515	1,847,520	1,004,148	(20,915)	(11,367)
345.00 Accessory Electric Equipment	7,407,275	0.54351107	196,293	106,687	189,626	103,064	(6,667)	(3,623)
346.00 Miscellaneous Power Plant Equipment	152,324	0.54351107	5,849	3,179	7,510	4,082	1,661	903
Total Langdon	\$ 79,761,389		\$ 2,135,163	\$ 1,160,484	\$ 2,107,006	\$ 1,145,182	\$ (28,157)	\$ (15,302)

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

Account Description A	12/31/20 Plant Investment B	Minnesota Allocation Factor C	Current Annual Accrual		Updated Annual Accrual		Difference	
			Total D	Minnesota E=C*D	Total F	Minnesota G=C*F	Total H=F-D	Minnesota I=G-E
Luverne								
341.00 Structures and Improvements	\$ 2,266,581	0.54351107	\$ 63,011	\$ 34,247	\$ 61,198	\$ 33,262	\$ (1,813)	\$ (985)
344.00 Generators	66,965,098	0.54351107	1,921,898	1,044,573	1,901,809	1,033,654	(20,089)	(10,919)
345.00 Accessory Electric Equipment	4,863,837	0.54351107	135,215	73,491	131,324	71,376	(3,891)	(2,115)
346.00 Miscellaneous Power Plant Equipment	164,770	0.54351107	5,355	2,911	7,514	4,084	2,159	1,173
Total Luverne	\$ 74,260,286		\$ 2,125,479	\$ 1,155,222	\$ 2,101,845	\$ 1,142,376	\$ (23,634)	\$ (12,846)
Merricourt								
341.00 Structures and Improvements	\$ 7,464,368	0.54351107	\$ -	\$ -	\$ 237,367	\$ 129,012	\$ 237,367	\$ 129,012
344.00 Generators	223,931,038	0.54351107			7,121,007	3,870,346	7,121,007	3,870,346
345.00 Accessory Electric Equipment	17,416,858	0.54351107			553,856	301,027	553,856	301,027
346.00 Miscellaneous Power Plant Equipment		0.54351107						
Total Merricourt	\$ 248,812,264		\$ -	\$ -	\$ 7,912,230	\$ 4,300,385	\$ 7,912,230	\$ 4,300,385
SOLAR PRODUCTION								
Jamestown								
343.00 Prime Movers	\$ 159,181	0.54351107	\$ 6,431	\$ 3,495	\$ 6,813	\$ 3,703	\$ 382	\$ 208
Total Jamestown	\$ 159,181		\$ 6,431	\$ 3,495	\$ 6,813	\$ 3,703	\$ 382	\$ 208
Rush Lake								
343.00 Prime Movers	\$ 154,255	0.54351107	\$ 6,232	\$ 3,387	\$ 6,494	\$ 3,530	\$ 262	\$ 143
Total Rush Lake	\$ 154,255		\$ 6,232	\$ 3,387	\$ 6,494	\$ 3,530	\$ 262	\$ 143

OTTER TAIL POWER COMPANY

Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2020

Statement C

Account Description A	Plant Investment B	Recorded Reserve		Computed Reserve		Reserve Imbalance		
		Amount C	Ratio D=C/B	Amount E	Ratio F=E/B	Amount G=C-E	Multiple H=G/C	
INTANGIBLE PLANT								
303.91 Software - 5 Year	\$ 5,848,316	\$ 3,416,666	58.42%	\$ 3,611,144	61.75%	\$ (194,478)	-5.69%	
303.92 Software - 10 Year	20,179,746	3,717,709	18.42%	3,026,962	15.00%	690,747	18.58%	
Total Intangible Plant	\$ 26,028,062	\$ 7,134,376	27.41%	\$ 6,638,106	25.50%	\$ 496,270	6.96%	
STEAM PRODUCTION								
311.00 Structures and Improvements	\$ 121,217,007	\$ 62,979,106	51.96%	\$ 53,952,348	44.51%	\$ 9,026,758	14.33%	
312.00 Boiler Plant Equipment	339,466,251	148,440,024	43.73%	147,220,233	43.37%	1,219,791	0.82%	
312.10 Boiler Plant Equipment - Landfill	10,412,772	3,570,240	34.29%	1,917,990	18.42%	1,652,250	46.28%	
314.00 Turbogenerator Units	65,901,519	46,266,694	70.21%	40,516,447	61.48%	5,750,247	12.43%	
315.00 Accessory Electric Equipment	35,770,319	21,141,273	59.10%	18,003,587	50.33%	3,137,686	14.84%	
316.00 Miscellaneous Power Plant Equipment	6,791,188	3,750,751	55.23%	3,651,984	53.78%	98,768	2.63%	
Total Steam Production Plant	\$ 579,559,056	\$ 286,148,088	49.37%	\$ 265,262,587	45.77%	\$ 20,885,501	7.30%	
HYDRAULIC PRODUCTION								
331.00 Structures and Improvements	\$ 351,712	\$ 336,709	95.73%	\$ 131,224	37.31%	\$ 205,485	61.03%	
332.00 Reservoirs, Dams and Waterways	7,500,256	3,985,865	53.14%	1,356,270	18.08%	2,629,595	65.97%	
333.00 Water Wheels, Turbines & Generators	1,373,867	1,320,802	96.14%	307,083	22.35%	1,013,720	76.75%	
334.00 Accessory Electric Equipment	597,103	573,259	96.01%	198,586	33.26%	374,673	65.36%	
335.00 Miscellaneous Power Plant Equipment	435,295	401,017	92.13%	91,378	20.99%	309,640	77.21%	
Total Hydraulic Production Plant	\$ 10,258,233	\$ 6,617,653	64.51%	\$ 2,084,540	20.32%	\$ 4,533,112	68.50%	
OTHER PRODUCTION								
341.00 Structures and Improvements	\$ 5,336,904	\$ 2,671,761	50.06%	\$ 2,601,998	48.75%	\$ 69,763	2.61%	
342.00 Fuel Holders and Accessories	1,764,466	1,046,613	59.32%	979,993	55.54%	66,620	6.37%	
343.00 Prime Movers	31,398,808	16,308,754	51.94%	17,169,097	54.68%	(860,342)	-5.28%	
344.00 Generators								
345.00 Accessory Electric Equipment	1,937,877	1,127,427	58.18%	1,096,103	56.56%	31,324	2.78%	
346.00 Miscellaneous Power Plant Equipment	428,921	209,595	48.87%	202,605	47.24%	6,990	3.34%	
Total Other Production Plant	\$ 40,866,976	\$ 21,364,151	52.28%	\$ 22,049,797	53.96%	\$ (685,645)	-3.21%	
WIND PRODUCTION								
341.00 Structures and Improvements	\$ 15,463,308	\$ 3,921,122	25.36%	\$ 3,068,622	19.84%	\$ 852,500	21.74%	
344.00 Generators	467,617,122	113,308,193	24.23%	90,777,574	19.41%	22,530,619	19.88%	
345.00 Accessory Electric Equipment	36,167,744	9,143,015	25.28%	7,146,988	19.76%	1,996,027	21.83%	
346.00 Miscellaneous Power Plant Equipment	438,269	(26)	-0.01%	39,770	9.07%	(39,796)	152068.56%	
Total Wind Production Plant	\$ 519,686,443	\$ 126,372,303	24.32%	\$ 101,032,953	19.44%	\$ 25,339,350	20.05%	
SOLAR PRODUCTION								
343.00 Prime Movers	313,436	7,138	2.28%	12,383	3.95%	(5,245)	-73.48%	
Total Solar Production Plant	\$ 313,436	\$ 7,138	2.28%	\$ 12,383	3.95%	\$ (5,245)	-73.48%	

OTTER TAIL POWER COMPANY

Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2020

Statement C

Account Description	Plant Investment	Recorded Reserve		Computed Reserve		Reserve Imbalance	
		Amount	Ratio	Amount	Ratio	Amount	Multiple
A	B	C	D=C/B	E	F=E/B	G=C-E	H=G/C
TRANSMISSION PLANT							
353.00 Station Equipment	\$ 162,264,161	\$ 28,532,404	17.58%	\$ 27,672,232	17.05%	\$ 860,172	3.01%
354.00 Towers and Fixtures	191,081,948	13,936,739	7.29%	13,648,347	7.14%	288,392	2.07%
355.00 Poles and Fixtures	147,132,677	57,303,246	38.95%	48,949,904	33.27%	8,353,342	14.58%
356.00 Overhead Conductors and Devices	171,989,284	48,109,709	27.97%	39,632,652	23.04%	8,477,057	17.62%
358.00 Underground Conductors and Devices	77,461	75,223	97.11%	59,998	77.46%	15,225	20.24%
Total Transmission Plant	\$ 672,545,531	\$ 147,957,320	22.00%	\$ 129,963,132	19.32%	\$ 17,994,188	12.16%
DISTRIBUTION PLANT							
362.00 Station Equipment	\$ 89,667,123	\$ 25,379,632	28.30%	\$ 18,800,578	20.97%	\$ 6,579,055	25.92%
364.00 Poles, Towers and Fixtures	79,123,058	47,403,278	59.91%	49,032,319	61.97%	(1,629,041)	-3.44%
365.00 Overhead Conductors and Devices	56,852,617	43,702,491	76.87%	33,798,449	59.45%	9,904,042	22.66%
367.00 Underground Conductors and Devices	92,508,809	41,498,124	44.86%	34,357,949	37.14%	7,140,176	17.21%
368.00 Line Transformers	112,721,811	18,906,759	16.77%	23,999,970	21.29%	(5,093,211)	-26.94%
369.00 Overhead Services	13,652,260	17,312,730	126.81%	18,880,351	138.29%	(1,567,621)	-9.05%
369.10 Underground Services	46,383,443	21,334,137	46.00%	19,027,424	41.02%	2,306,713	10.81%
370.00 Meters	27,268,533	9,454,127	34.67%	9,197,872	33.73%	256,255	2.71%
370.05 Smart Meters	921,313	86,696	9.41%	111,940	12.15%	(25,243)	-29.12%
370.10 Load Management Switches	8,899,439	8,687,371	97.62%	7,934,506	89.16%	752,865	8.67%
371.20 Other Private Lighting	7,107,183	598,167	8.42%	373,218	5.25%	224,950	37.61%
373.00 Street Lighting and Signal Systems	9,509,826	2,220,909	23.35%	1,906,219	20.04%	314,690	14.17%
Total Distribution Plant	\$ 544,615,415	\$ 236,584,423	43.44%	\$ 217,420,795	39.92%	\$ 19,163,628	8.10%
GENERAL PLANT							
Depreciable							
390.00 Structures and Improvements	\$ 20,656,074	\$ 6,875,706	33.29%	\$ 7,503,782	36.33%	\$ (628,076)	-9.13%
390.10 General Office Buildings	6,379,788	2,521,536	39.52%	1,438,956	22.55%	1,082,580	42.93%
390.20 Fleet Service Center Building	3,133,344	638,632	20.38%	108,741	3.47%	529,891	82.97%
390.30 Central Stores Building	4,276,593	1,576,199	36.86%	555,072	12.98%	1,021,127	64.78%
396.00 Power Operated Equipment	1,430,267	222,201	15.54%	267,917	18.73%	(45,716)	-20.57%
397.40 Communication Towers	1,877,722	999,462	53.23%	794,543	42.31%	204,919	20.50%
Total Depreciable	\$ 37,753,788	\$ 12,833,736	33.99%	\$ 10,669,011	28.26%	\$ 2,164,725	16.87%
Amortizable							
391.00 Office Furniture	\$ 703,063	\$ 469,720	66.81%	\$ 473,673	67.37%	\$ (3,953)	-0.84%
391.10 Office Equipment	374,681	260,618	69.56%	267,273	71.33%	(6,655)	-2.55%
391.20 Duplicating Equipment	239,837	126,896	52.91%	133,431	55.63%	(6,535)	-5.15%
391.50 Computer Systems	3,706,467	2,147,244	57.93%	2,478,694	66.87%	(331,450)	-15.44%
391.60 Computer Related Equipment	2,075,789	780,871	37.62%	1,207,138	58.15%	(426,267)	-54.59%
394.00 Tools, Shop and Garage Equipment	4,147,732	2,255,422	54.38%	2,298,690	55.42%	(43,268)	-1.92%

OTTER TAIL POWER COMPANY

Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2020

Statement C

Account Description A	Plant Investment B	Recorded Reserve		Computed Reserve		Reserve Imbalance	
		Amount C	Ratio D=C/B	Amount E	Ratio F=E/B	Amount G=C-E	Multiple H=G/C
394.20 Automated Meter Reading Equipment	950,669	589,508	62.01%	592,766	62.35%	(3,258)	-0.55%
397.00 Communication Equipment	2,965,064	940,475	31.72%	1,031,589	34.79%	(91,114)	-9.69%
397.10 Radio Telecommunication Equipment	693,083	627,260	90.50%	634,099	91.49%	(6,839)	-1.09%
397.20 Microwave Equipment	3,276,047	1,669,432	50.96%	1,722,395	52.58%	(52,963)	-3.17%
397.30 Radio Load Control Equipment	459,343	334,053	72.72%	364,503	79.35%	(30,450)	-9.12%
Total Amortizable	\$ 19,591,775	\$ 10,201,498	52.07%	\$ 11,204,251	57.19%	\$ (1,002,753)	-9.83%
Total General Plant	\$ 57,345,563	\$ 23,035,234	40.17%	\$ 21,873,262	38.14%	\$ 1,161,972	5.04%
TOTAL UTILITY	\$ 2,451,218,715	\$ 855,220,686	34.89%	\$ 766,337,556	31.26%	\$ 88,883,130	10.39%
STEAM PRODUCTION							
Big Stone							
311.00 Structures and Improvements	\$ 80,325,431	\$ 29,777,164	37.07%	\$ 24,234,413	30.17%	\$ 5,542,752	18.61%
312.00 Boiler Plant Equipment	195,361,279	41,976,676	21.49%	47,113,758	24.12%	(5,137,082)	-12.24%
312.10 Boiler Plant Equipment - Landfill							
314.00 Turbogenerator Units	30,372,433	19,535,654	64.32%	14,066,714	46.31%	5,468,940	27.99%
315.00 Accessory Electric Equipment	20,863,979	9,179,329	44.00%	7,230,159	34.65%	1,949,169	21.23%
316.00 Miscellaneous Power Plant Equipment	3,328,474	1,440,336	43.27%	1,294,477	38.89%	145,859	10.13%
Total Big Stone	\$ 330,251,596	\$ 101,909,159	30.86%	\$ 93,939,521	28.44%	\$ 7,969,638	7.82%
Hoot Lake Units 2 and 3							
311.00 Structures and Improvements	\$ 6,096,309	\$ 6,889,576	113.01%	\$ 7,042,796	115.53%	\$ (153,221)	-2.22%
312.00 Boiler Plant Equipment	37,830,819	41,395,268	109.42%	41,786,416	110.46%	(391,148)	-0.94%
312.10 Boiler Plant Equipment - Landfill	10,412,772	3,570,240	34.29%	1,917,990	18.42%	1,652,250	46.28%
314.00 Turbogenerator Units	11,558,817	12,931,001	111.87%	13,163,259	113.88%	(232,258)	-1.80%
315.00 Accessory Electric Equipment	2,766,673	3,106,688	112.29%	3,164,514	114.38%	(57,826)	-1.86%
316.00 Miscellaneous Power Plant Equipment	1,190,054	1,296,386	108.94%	1,313,491	110.37%	(17,105)	-1.32%
Total Hoot Lake Units 2 and 3	\$ 69,855,444	\$ 69,189,159	99.05%	\$ 68,388,466	97.90%	\$ 800,693	1.16%
Coyote							
311.00 Structures and Improvements	\$ 34,795,267	\$ 26,312,366	75.62%	\$ 22,675,138	65.17%	\$ 3,637,228	13.82%
312.00 Boiler Plant Equipment	106,274,153	65,068,080	61.23%	58,320,059	54.88%	6,748,021	10.37%
312.10 Boiler Plant Equipment - Landfill							
314.00 Turbogenerator Units	23,970,269	13,800,039	57.57%	13,286,474	55.43%	513,565	3.72%
315.00 Accessory Electric Equipment	12,139,667	8,855,256	72.94%	7,608,914	62.68%	1,246,343	14.07%
316.00 Miscellaneous Power Plant Equipment	2,272,660	1,014,028	44.62%	1,044,016	45.94%	(29,987)	-2.96%
Total Coyote	\$ 179,452,016	\$ 115,049,770	64.11%	\$ 102,934,600	57.36%	\$ 12,115,170	10.53%