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July 13, 2015

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

RE: In the Matter of Otter Tail Power Company 2014 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2015 Docket No. E017/M-15-322 Reply Comments

Dear Mr. Wolf:

Otter Tail Power Company ("Otter Tail") submits these Reply Comments in response to the Department of Commerce, Division of Energy Resources ("Department") July 1, 2015 Comments in the above-captioned matter. Otter Tail appreciates the Department's thorough review of Otter Tail's 2014 Safety, Reliability, and Service Quality Report.

The Department Comments recommend that the Commission accept Otter Tail's 2014 report and set Otter Tail's 2015 SAIFI, SAIDI and CAIDI Standards at the 2013 levels until Otter Tail demonstrates further improvement in meeting its performance standards. Otter Tail accepts this recommendation. Otter Tail emphasizes the importance of reliable service throughout the organization. Recognizing the number of reliability indices that were not met in 2013 and considering reliability performance in recent years, Otter Tail has continued to add processes to track and improve reliability. These efforts have been effective and will continue to improve reliability.

A Certificate of Service on all parties is also enclosed.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8395 or email me at jfyhrie@otpc.com, should you have any questions with respect to this matter.

Sincerely,

/s/ JESSICA FYHRIE
Jessica Fyhrie
State Regulatory Compliance Specialist

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Enclosures
By electronic filing
c: Service List

An Equal Opportunity Employer

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2014 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2015
Docket No. E017/M-15-322**

I, Nancy L. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **13th** day of **July, 2015**

/s/ NANCY L. OLSON

Nancy L. Olson
Regulatory Filing Coordinator
Otter Tail Power Company
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