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February 21, 2014



Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 Seventh Place East, Suite 350
St. Paul, MN 55101-2147

**Re: In the Matter of a Commission Inquiry into Ownership of Renewable Energy Credits
used to Meet Minnesota Requirements
Minnesota Docket No. E999/CI-13-720
REPLY COMMENTS**

Dear Dr. Haar:

Otter Tail Power Company submits the enclosed reply comments in response to the Minnesota Public Utilities Commission's ("Commission's") Notice for Comment Period on Commission Inquiry issued December 30, 2013.

We have electronically filed this document with the Commission, which also constitutes service on the Minnesota Department of Commerce, Division of Energy Resources and the Office of the Attorney General, Antitrust and Utilities Division. A copy of this filing has been served on all parties on the service list in this docket.

Please contact me at (218) 739-8417 or bhdraxten@otpc.com if you have any questions.

Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

wao
Enclosures
By electronic filing
c: Service List

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

In the Matter of a Commission Inquiry into
Ownership of Renewable Energy Credits
used to Meet Minnesota Requirements

Docket No. E999/CI-13-720

**OTTER TAIL POWER COMPANY'S
REPLY COMMENTS**

I. REPLY COMMENTS

Otter Tail Power Company ("Otter Tail") respectfully submits the following reply comments in the above-captioned matter. Otter Tail reaffirms its original comments and notes that the uniform state-wide contract (rule 7835.9910) is silent on REC ownership. Otter Tail believes that the universal state-wide contract should be altered to allow the customer to choose the REC ownership. Of course, the price would be different between the two ownership options.

For historical projects subject to the universal state-wide contract, Otter Tail is indifferent to the handling of REC ownership.

Dated: February 21, 2014

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ BRIAN DRAXTEN

Brian Draxten

Manager, Resource Planning

Otter Tail Power Company

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(218) 739-8417

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CERTIFICATE OF SERVICE

**RE: In the Matter of a Commission Inquiry into Ownership of Renewable Energy
Credits used to Meet Minnesota Requirements
Docket No. E999/CI-13-720**

I, Wendi A. Olson, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar 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 **21st** day of **February 2014**.

/s/ WENDIA. OLSON
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Enio	Ricci	ericci@invenergyllc.com	Invenergy LLC	17830 New Hampshire Ave Ste 300 Ashton, MD 20861	Paper Service	No	OFF_SL_13-720_Official

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Raymond	Sand	rms@dairynet.com	Dairyland Power Cooperative	P.O. Box 8173200 East Avenue South LaCrosse, WI 546020817	Electronic Service	No	OFF_SL_13-720_Official
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