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April 1, 2025

Mr. William 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 2024 Annual Safety,
Reliability and Service Quality Report and Proposed SAIFI, SAIDI
and CAIDI Reliability Standards for 2025
Docket No. E017/M-25-30
Annual Report**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) submits the enclosed Annual Report pursuant to Minn. Rules 7826.0400, 7826.0500, and 7826.1300. This Annual Report presents our safety, reliability, and service quality performance for the year 2024 and proposed reliability standards for 2025 pursuant to Minn. Rule 7826.0600.

Otter Tail Power has electronically filed this document with the Commission. In compliance with Minn. Rule 7829.1300, subp. 2, Otter Tail Power is serving a copy of this filing on the Department of Commerce – Division of Energy Resources and Office of Attorney General – Residential Utilities Division. A Summary of the filing has been served on all persons on Otter Tail’s General Service list. A Certificate of Service 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) 739-8443 or email me at ckremeier@otpc.com.

Sincerely,

/s/ *COLLIN KREMEIER*
Collin Kremeier
Supervisor, Customer Care Administration & Outage Management

lcd
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 2024 Annual Safety,
Reliability and Service Quality
Report and Proposed SAIFI, SAIDI
and CAIDI Reliability Standards
for 2025**

Docket No. E017/M-25-30

SUMMARY OF FILING

Please take notice that on April 1, 2025, Otter Tail Power Company (Otter Tail Power), filed with the Minnesota Public Utilities Commission its annual Safety, Reliability and Service Quality Report for 2024 pursuant to Minnesota Rules 7826.0400, 7826.0500 and 7826.1300. Pursuant to Minnesota Rule 7826.0600, Subp. 1, Otter Tail Power proposes SAIFI, SAIDI and CAIDI reliability standards for 2025.

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

**In the Matter of Otter Tail Power
Company's 2024 Annual Safety,
Reliability and Service Quality
Report and Proposed SAIFI,
SAIDI and CAIDI Reliability
Standards for 2025**

**Docket No. E017/M-25-30

ANNUAL REPORT
AND PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power or the Company) submits this filing in compliance with Minnesota Rules 7826.0400, 7826.0500, 7826.0600, subp. 1, and 7826.1300. This filing also includes compliance items from previous Minnesota Public Utilities Commission (Commission) Orders.

II. GENERAL FILING INFORMATION

Pursuant to Minnesota Rule 7829.1300, subp. 3, Otter Tail Power provides the following general information.

A. Name, Address, and Telephone Number of Utility

Otter Tail Power Company
215 South Cascade Street
P. O. 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
Fergus Falls, MN 56538-0496
(218) 739-8956
cstephenson@otpc.com

C. Date of Filing

This Report is being filed on April 1, 2025.

D. Title of Utility Employees Responsible for Filing

Collin Kremeier
Supervisor, Customer Care Administration & Outage Management
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8443
ckremeier@otpc.com

E. Service List

(Minn. Rules 7829.0700)

Otter Tail Power requests that the following persons be placed on the Commission's official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail Power:

Collin Kremeier
Supv, Cust Care Admin & Outage Mgmt
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
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Cary Stephenson
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cstephenson@otpc.com

Regulatory Filing Coordinator
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215 South Cascade Street
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpc.com

F. Service on other parties

(Minn. Rules 7829.1300, subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, subp. 2, Otter Tail Power served a copy of this Petition on the Division of Energy Resources of the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, subp. 1 was served on all parties on Otter Tail Power's general service list.

III. DESCRIPTION AND PURPOSE OF FILING

A. Annual Reporting

Minnesota Rules 7826.0400, 7826.0500 and 7826.1300 require electric utilities to file reports on safety, reliability, and service quality performance for the prior year. Otter Tail Power's 2024 Safety, Reliability, and Service Quality Report is attached.

B. Proposed reliability standards for 2025

Minnesota Rules 7826.0600, subp. 1, requires electric utilities to propose reliability performance standards for each of its work centers. The rule requires the performance standards be filed on or before April 1 of each year. The utility is to propose standards for the following reliability indices:

1. System average interruption duration index or SAIDI
2. System average interruption frequency index or SAIFI
3. Customer average interruption duration index or CAIDI

Otter Tail Power agrees to set standards for reliability indices at IEEE's Reliability Benchmark Survey median values for medium sized utilities for the corresponding year's data set, i.e. 2024 goals will be set on the 2024 IEEE Benchmark Survey results, as provided historically in September of 2025.

The current year report historically is completed, and results posted, in the third quarter of the following year. Otter Tail Power will provide a supplemental filing within 30 days from when IEEE's 2024 Benchmark Reliability Survey results are completed and provide explanations for standards not met.

IV. CONCLUSION

Otter Tail Power appreciates the opportunity to provide this Safety, Reliability, and Service Quality Report for 2024, and requests Commission approval of our proposed reliability standards for 2025.

Date: April 1, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ COLLIN KREMEIER

Collin Kremeier

Supervisor, Customer Care Administration &
Outage Management

Otter Tail Power Company

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APRIL 1, 2025



Safety, Reliability, and Service Quality Report for 2024

Including Additional Compliance Obligations



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I. EXECUTIVE MANAGEMENT’S VIEW OF RELIABILITY

This section provides the view of Otter Tail Power’s executive management towards reliability and customer satisfaction.

Otter Tail Power Company (Otter Tail Power or the Company) is committed to providing quality and reliable service for the rural communities we serve. Reliability at Otter Tail Power continues to be best summarized in the Company’s mission statement:

“To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business.”

Otter Tail Power serves more than 133,700 customers in a service area that spans 70,000 square miles in western Minnesota, eastern North Dakota, and northeastern South Dakota. Our service area is predominantly rural and agricultural. We generate about one-third of revenues from residential customers, and the remaining revenues come from industrial and commercial customers. The average population of the 422 communities we serve is approximately 400, and over one-half of the communities we serve have populations of fewer than 200. Only three of our communities have populations exceeding 10,000: Fergus Falls, Minnesota (pop. 13,138), Bemidji, Minnesota (pop. 13,431), and Jamestown, North Dakota (pop. 15,427). We operate nine Customer Service Centers (CSCs) and are committed to proactive efforts of communicating, investigating, and resolving reliability issues across our service territory.

The integrity of Otter Tail Power’s entire transmission and distribution system is directly related to interruption frequency; thus, the accountability lies within our Asset Management area. Otter Tail Power’s Asset Management area is accountable for the planning, engineering and design, execution, operation and on-going maintenance and reliability oversight to ensure that we provide reliable and affordable electric service to our customers. At Otter Tail Power, we employ a system of Key Performance Indicators (KPIs), for the purpose of providing additional focus on achievement in particular areas of our operations. Two of Asset Management’s KPIs are reliability indices dealing with interruption frequency: the Momentary Average Interruption Frequency Index (MAIFI) and System Average Interruption Frequency Index (SAIFI).

Otter Tail Power’s Customer Service area is accountable for responding to all interruptions. Thus, Otter Tail Power’s Customer Service area is accountable for the cost effective and efficient deployment of field personnel, trucks, and equipment as quickly and safely as possible, necessary for restoring service to customers when interruptions occur. One of the Customer Service area’s KPIs is Customer Average Interruption Duration Index (CAIDI). Additionally, the Reliability indices, SAIDI, SAIFI, CAIDI, and MAIFI are companywide KPI’s. These indices are communicated and reviewed with all impacted employees, on a monthly basis, with the expectation that all employees remain cognizant of our company’s reliability performance.

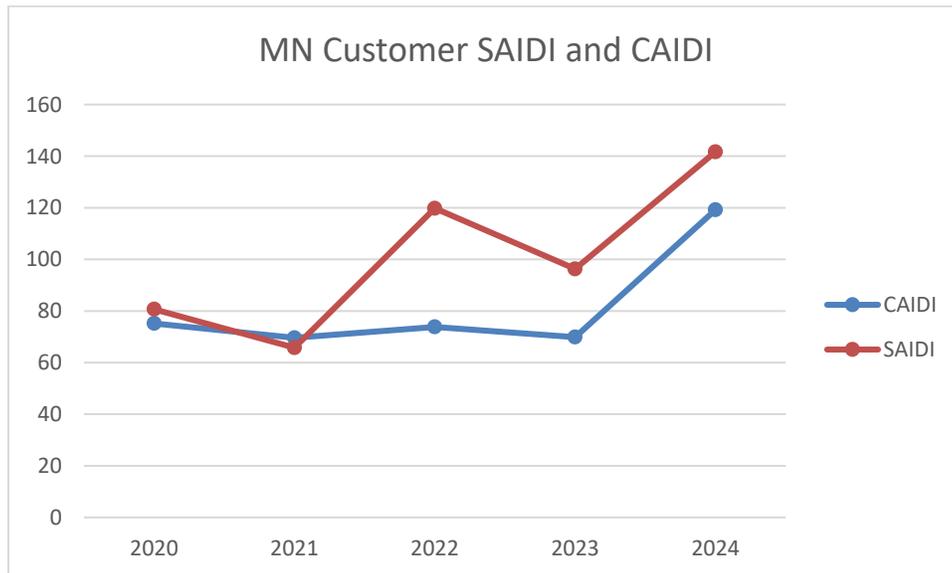
Otter Tail Power continues to investigate upgrades to increase the resiliency of our system to withstand increased weather events into the future and has several projects in process.

The Asset Management and Customer Service areas have a common goal, which is to improve the overall system reliability. Each area recognizes the overall system improvement cannot be accomplished without collaboratively working with the other area. Each area also recognizes system reliability improvements are based on cost effective decisions and overall system improvements over longer periods of time.

II. 2024 SUMMARY GRAPHS

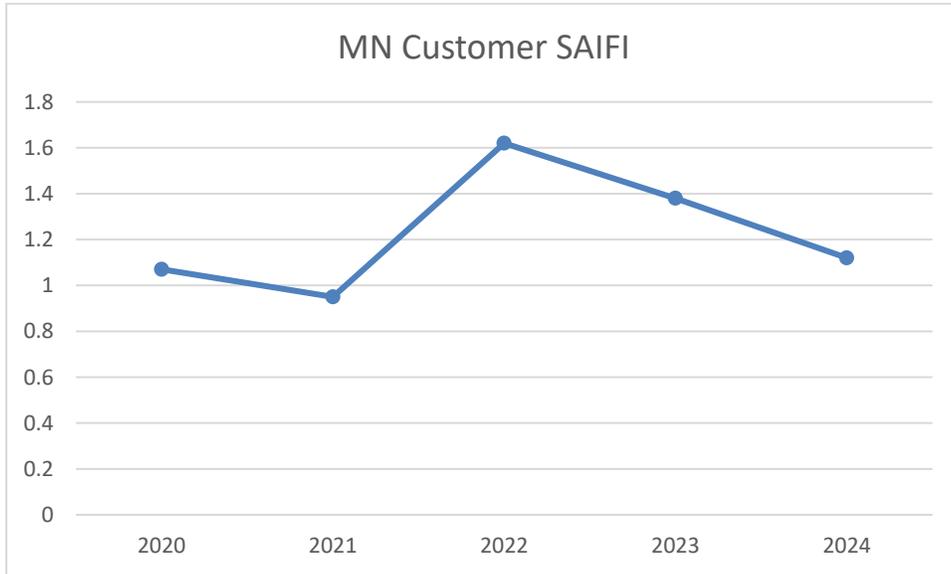
As included in previous reports, Otter Tail Power provides a summary that allows the reader to more easily assess the overall reliability of the system and identify the main factors that affect reliability. Figure 1 through Figure 5 and Table 1 below provides a summary of Otter Tail Power’s overall Minnesota reliability and service quality for the years 2020 through 2024. Of note, 2024 data is from our Outage Management System (OMS), except for MAIFI which was gathered from our Interruption Monitoring System (IMS). The OMS gathers data at the customer level and not the feeder level as previously reported. 2024 is the first year Otter Tail Power is utilizing reliability data from its new OMS gathering data at the customer level and not the feeder level as reported in past years. As discussed in previous reports, this additional data capturing is more accurate but does capture more interruption minutes.

Figure 1 – Normalized Historic Minnesota SAIDI and CAIDI



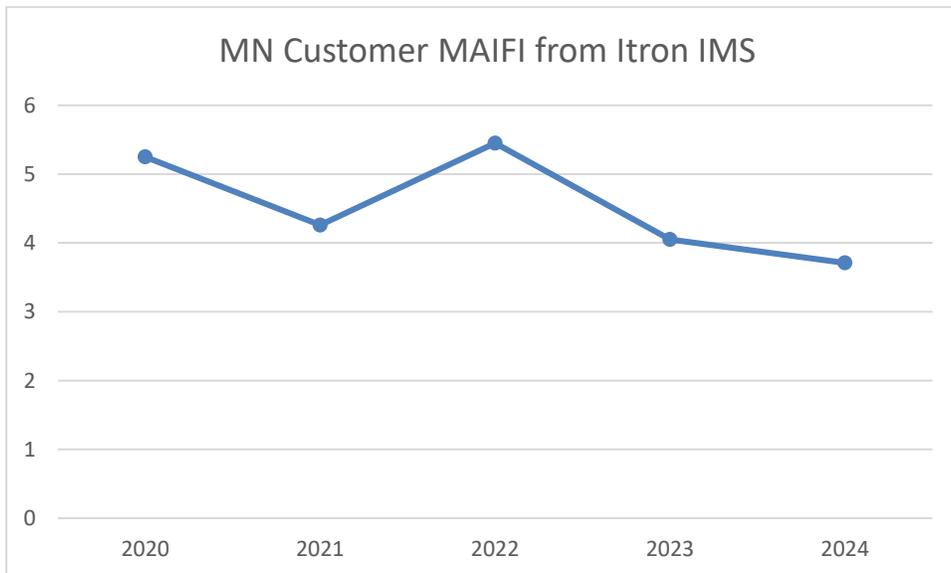
Otter Tail Power saw normalized performance levels increase for both SAIDI and CAIDI for 2024 due to our new OMS monitoring process.

Figure 2 – Normalized Minnesota Historic SAIFI



Otter Tail Power saw normalized performance levels decrease for SAIFI for 2024 as measured by our new OMS monitoring process.

Figure 3 – Non-normalized Minnesota Historic MAIFI



Otter Tail Power’s 2024 MAIFI data was gathered on our IMS. This system no longer exists as of 2024 year-end. Our new Landis + Gyr AMI (Advanced Metering Infrastructure) system will gather MAIFI data for 2025 and future reporting. In summary, Otter Tail Power has realized a decrease in MAIFI over the past four years.

Table 1

Normalized MAIFI by Customer Service Center collected from Itron IMS

CSC 2024	MAIFI
Bemidji	3.21
Crookston	4.86
Fergus Falls	3.76
Morris	3.26
MN Total	3.7

MAIFI is the momentary average interruption frequency index. It is an indication of the average number of momentary interruptions the average customer received over the course of a year, for a particular region. Otter Tail Power views MAIFI as a leading indicator for future SAIDI and thus tracks and analyzes line sections with higher than average momentary interruptions for future capital improvements or possible vegetation management needs. MAIFI data was collected from our Itron IMS. Our new AMI meters have begun gathering MAIFI data in 2025 as Itron meters in MN will be removed.

Figure 4 – Full Time Lineworkers available for trouble calls and for the operation and maintenance of Minnesota distribution lines

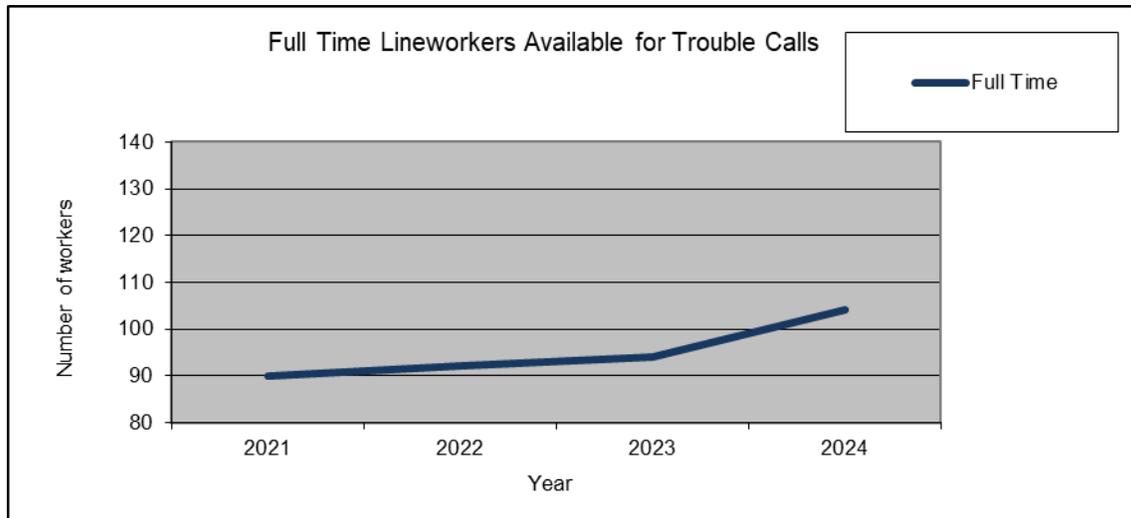
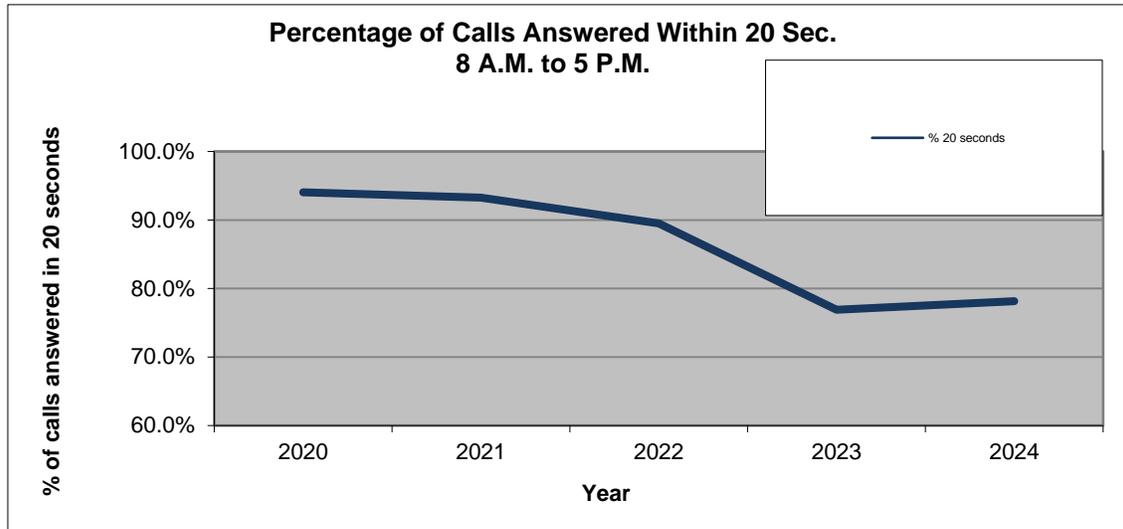


Figure 5 - Calls Answered within 20 Seconds

Otter Tail Power did not meet the 80 percent of our calls answered within 20 seconds requirement this year. We have submitted more details in section IX Reporting Call Center Response Times in Table 36.



III. ANNUAL SAFETY REPORT 7826.0400

Pursuant to Minnesota Rule 7826.0400, ANNUAL SAFETY REPORT, each utility shall file a report on its safety performance during the last calendar year. This report shall include the following information.

- A. Summary of all reports filed with the United States Occupational Safety and Health Administration and the Occupational Safety and Health Division of the Minnesota Department of Labor and Industry during the 2024 Calendar year.

Table 2

NUMBER OF CASES				
Total number of deaths	Total number of cases with days away from work	Total number of cases with job transfer or restriction	Total number of other recordable cases	
0	1	2	8	
NUMBER OF DAYS				
Total number of days of job transfer or restriction		Total number of days away from work		
49		4		
INJURY AND ILLNESS TYPES				
Injuries	Skin disorders	Respiratory conditions	Poisonings	All other illnesses
9	2	0	0	0

When an injury or illness involves one or more days away from work, you must record the injury or illness on the OSHA 300 Log with a check mark in the space for cases involving days away and an entry of the number of calendar days away from work in the number of days column. The number of cases with job transfers or restrictions safety metric employers determine how many workplace injuries and illnesses required employees to miss work, perform restricted work activities or transfer to another job within a calendar year. The number of other recordable cases describes the work-related injury of illness that does not involve death, days away from work, or days of restricted work or job transfer, and where the employee receives medical treatment beyond first aid. The total number of days away from work shows the total number of calendar days away from work for all work-related injuries and illnesses.

B. A description of all incidents during the calendar year in which an injury requiring medical attention or property damage resulting in compensation occurred as a result of downed wires or other electric system failures and all remedial action taken as a result of any injuries or property damage described, are shown in Table 3.

Table 3

ANNUAL SAFETY REPORT				
Date	Cause	Type	Action Taken	Expense
<i>There were no instances of personal injury due to system failures in 2024.</i>				

IV. RELIABILITY REPORTING REQUIREMENTS 7826.0500

Subpart 1. Annual reporting requirements. On or before April 1 of each year, each utility shall file on its reliability performance during the last calendar year.

A – D. REPORT OF OTTER TAIL POWER’S SAIDI, SAIFI, AND CAIDI FOR 2024 AND STORM NORMALIZATION OF RELIABILITY DATA

Minnesota Rule 7826.0500, Subparts 1a, 1b, 1c, and 1d requires the utility to file a report on its SAIDI, SAIFI and CAIDI for the calendar year, by work center and for its assigned service area as a whole. Additionally, this rule requires the utility to provide an explanation of how the utility normalized its reliability data to account for major storms.

Since 2018, Otter Tail Power had used our Itron interruption monitoring system, IMS, to calculate storm normalized reliability data. 2024’s reporting process utilizes our new Milsoft Outage Manage System (OMS) and associated data. Our OMS does not have enough data to provide the **2.5 beta normalization process** and associated metrics (this process recommends 5-years of data). We are working to improve data quality and reporting from the OMS.

Otter Tail Power’s 2024 Storm Normalization was based on the analysis of 2023 OMS data and the selection of a duration threshold that would most likely provide IEEE’s selection and intention of the 2.5 Beta storm normalization process. Otter Tail Power selected ten minutes as the major event day (MED) duration threshold.

After applying ten minutes as our storm normalization duration threshold for 2024, one day met the criteria to be considered a Major Event Day (MED), October 5, 2024.

- October 5, 2024 – A powerful cold front moved across the west, northwest portion of our service territory, producing wind gusts as high as 80 mph. This event impacted 74 substations causing 13.9 minutes of SAIDI contribution for the day. Most interruptions impacted North Dakota and South Dakota customers with very little impact to Minnesota customers.

Table 4 shows Otter Tail Power’s 2024 SAIFI, CAIDI, and SAIDI normalized results based on our applied duration threshold for each customer service center (CSC) and the entire Minnesota system. 2024 results were gathered by our OMS.

The 2024 IEEE Reliability Benchmarking Report will not be completed until the August 2024 timeframe. At that time, Otter Tail Power will compare statewide and work center results and will provide those results, including explanations for standards not met, in the supplemental filing required within 30 days from when IEEE’s 2024 Benchmark Reliability Survey results are completed.

Table 4

Normalized 2024			
CSC	SAIFI	SAIDI	CAIDI
Bemidji	1.05	114.77	109.75
Crookston	0.81	108.2	133.73
Fergus Falls	1.57	220.37	140.44
Morris	0.8	108.74	135.72
MN Total	1.16	141.55	122.22

Table 4a shows Otter Tail Power’s 2024 SAIFI, CAIDI, and SAIDI non-normalized results for each CSC and the entire Minnesota system.

Table 4a

Non-Normalized 2024			
CSC	SAIFI	SAIDI	CAIDI
Bemidji	1.1	117.87	107.36
Crookston	0.81	108.31	133.66
Fergus Falls	1.57	220.69	140.44
Morris	0.8	108.74	135.72
MN Total	1.18	153.23	129.73

Reliability Standard Summary

Reliable service continues to be one of Otter Tail Power's top priorities and we are mindful that ongoing improvements in reliability will continue to happen over time and must be done cost effectively. We believe the continued maturity of our current processes and the application of new technologies and tools (i.e. our new OMS) will provide improved customer service results.

Table 5 provides a summary of the different types of interruption causes that affect overall Minnesota system reliability. It is not always possible to determine the cause of every interruption. This summary provides investigated and verified causes that were found in the field via patrols and inspections. 2024 cause summary data comes from our Outage Management System (OMS), implemented on December 20, 2022, and includes distribution interruption cause data.

Table 5 on next page

Table 5
2024 MN Sustained Interruption Summary
by CSC and cause

MN CSC	Transmission Interruption	Planned Outage	Equipment	Maintenance	Weather	Animals	Public	Other	Unknown	CSC Total
Bemidji										
Outages:	34	68	14	6	48	17	2	45	15	272
Customers Affected:	1,676	6,715	3,338	18	1,466	391	135	1,697	1,152	17,966
Customer Minutes:	190,474	921,439	259,563	3,046	74,821	69,373	6,170	159,499	125,836	1,971,831
Crookston										
Outages:	31	33	19	5	31	14	1	28	11	201
Customers Affected:	992	714	1,582	85	2,426	214	60	526	107	9,977
Customer Minutes:	88,526	47,675	144,533	20,177	437,118	52,555	11,400	79,626	24,427	1,334,273
Fergus Falls										
Outages:	89	93	74	5	61	60	4	53	28	570
Customers Affected:	7,454	1,455	3,691	117	1,659	4,959	26	4,240	1,963	35,575
Customer Minutes:	1,209,790	89,339	643,734	10,551	128,479	340,381	4,744	297,846	425,117	4,367,210
Morris										
Outages:	53	34	25	3	41	20	12	30	20	248
Customers Affected:	1,115	550	3,071	16	2,666	652	1,951	1,607	883	13,228
Customer Minutes:	204,471	67,689	386,470	483	767,977	31,281	79,941	186,624	30,461	1,795,355

E. ACTION PLAN FOR REMEDYING ANY FAILURE TO COMPLY WITH RELIABILITY STANDARDS

Minnesota Rule 7826.0500, Subpart 1e, requires utilities to file an action plan for remedying any failure to comply with reliability standards set forth in part 7826.0600 or an explanation as to why non-compliance was unavoidable under the circumstances.

As referenced in our action plan required in the Commission's Order dated December 20, 2012, in Docket No. E017/M-12-325, Otter Tail Power continues to enhance our new processes adopted by the Company to improve system reliability performance. The following is an update of our action plan:

- 1. Outage Management System:** As discussed in both Otter Tail Power's Integrated Distribution Plan (IDP) and Otter Tail Power's Electric Utility Infrastructure Cost (EUIC) recovery rider petition, Otter Tail Power went live with an Outage Management System (OMS) in December of 2022. Continued improvements to this system took place throughout 2024. Most of 2024 improvements had to do with improved processes surrounding data control and quality. In 2025, improvements will include an integration to AMI. In summary, the OMS has drastically improved the way in which outage information is organized and summarized. This system allows Otter Tail Power crews to respond to outages more efficiently which improves restoration times.

In addition, the more granular information from the OMS, when compared to 2019 through 2023 data from the Interruption Monitoring System (IMS), shows an increase in reported SAIDI and CAIDI as Otter Tail Power now utilizes that system for 2024 annual and future SRSQ reporting. However, this does not mean that reliability is degrading. In fact, over time, Otter Tail Power's use of this data will greatly aid in future investment decisions to improve reliability.

- 2. Customer Service and Asset Management Joint Monthly Team Meetings:** Local Customer Service Center operation management and engineering staff meet monthly to discuss any reliability concerns and system performance. In these meetings teams discuss more details including mitigation plans. At least once a year, a full system performance and reliability summary is shared with the full Otter Tail Power executive team.
- 3. Electronic Tracking Process for Transmission Patrol Reports and Maintenance Activities:** In 2021, the company approved a new field app (Field Worker) that has a direct tie to Otter Tail Power's staking system. This allows for a more efficient and seamless transition from when an issue is identified in the field to development of a work order to correct the concern. This allows the Company to more effectively schedule and manage maintenance activities based on historic and current maintenance data. This enables more efficient prioritization of resources. In addition, specific budget dollars are allocated for mitigating identified reliability concerns. The process continued to provide the several benefits noted throughout the past four years.

4. **Lightning Tracking System:** Otter Tail Power's lightning tracking system tracks lightning activity within Otter Tail Power's service territory. As in past years, this tool has been beneficial in identifying remote areas hit by lightning, assisting in follow-up patrols and inspections to identify damaged equipment. The integration of the lightning data with our GIS system allows for strike data to be tracked and compared to our asset locations, identifying areas for needed patrol following lightning/storm events.
5. **GIS Data Integration & Improvements:** As discussed in both Otter Tail Power's Integrated Distribution Plan (IDP) and Otter Tail Power's Electric Utility Infrastructure Cost (EUIC), Otter Tail Power greatly improved the quality of its GIS data through a data collection effort performed by a third-party. This work started in 2021, and all data was collected in 2023. Quality Assurance/Quality Control (QA/QC) was completed on March 1, 2024 (third party staffing issues and severe winter weather conditions delayed this completion). The information collected is used to better inform reliability improvement programs and projects. In addition, Otter Tail Power continues the integration of critical system data into its GIS. Underground fault data, patrol information, SEL distance relay data, lightning strike location data, and pole inspection data is all integrated into GIS providing an optimized approach to reliability related activities in the future.
6. **Fault Indicator Installations:** Otter Tail Power continues to install and utilize fault indicators for troubleshooting distribution and transmission line faults. Otter Tail Power will continue to monitor and investigate the improvement this equipment provides in our ability to identify fault locations more quickly, with the goal to improve CAIDI and SAIDI.
7. **Installation of Real-Time Voltage, Current, and Power Quality Monitors:** Otter Tail Power continues to utilize remote real-time power quality (PQ) monitors in the field to assist with investigating interruption events and PQ issues. Today, Otter Tail Power has 118 of these power quality monitors installed and operating throughout our system. These tools are located in identified problem areas and then redeployed in other areas once the issues are resolved. Data provided is real-time and displayed via a web browser or via downloads. Continued deployment of this equipment has improved Otter Tail Power's efforts in identifying power quality and reliability problems and issues in the field.
8. **Installation of Grid Monitoring Power Sensors:** In 2020, Otter Tail Power purchased and installed fifteen (15) Smart Grid power sensors for monitoring overhead distribution and 41.6 kV transmission circuits. They communicate via wireless cellular and provide real time notifications and power quality data. Otter Tail Power continues to apply this PQ tool and use its data for improving customer service, system operation and future planning.
9. **Vegetation Maintenance Improvement:** In July of 2023, Otter Tail Power signed a 1-year pilot program with AiDash to analyze 1,750 miles of distribution and 250 miles of transmission lines located in highly vegetated areas within our service territory. AiDash uses high-definition satellite imagery in combination with AI to prioritize these line sections within their IVMS (intelligent vegetation

management system) dashboard. In 2024, Otter Tail contracted with AiDash for an additional 1960 miles of distribution line to be assessed. This mileage imaged from AIDash was received in January 2025 and is being used to select/prioritize VM needs within our system. Otter Tail Power continues to investigate several technologies to determine the best and most efficient VM prediction analysis process. Satellite imaging, LiDAR, drone inspections, and Sense integration with our AMI implementation are all under investigation and scrutiny to determine the most cost effective VM evaluation process for the future.

This action plan will provide continued contribution towards cost-effective improvement of the Company's overall system reliability. Overall system improvements will be realized over longer periods of time. These improvements will come through new technology, improved efficiencies, disciplined primary cause investigation and analysis, situational awareness, and attention to overall cross-functional accountabilities.

F. INTERRUPTION OF BULK POWER SUPPLY FACILITY

Pursuant to Minnesota Rule 7826.0500, Subpart 1f, to the extent feasible, a report on each interruption of a bulk power supply facility during the calendar year, including the reasons for interruption, duration of interruption, and any remedial steps that have been taken or will be taken to prevent future interruption.

For the 2024 calendar year, Otter Tail Power reports that there was one bulk power supply interruption causing sustained interruptions to Minnesota Otter Tail Power customers.

On May 6, 2024, Strong winds damaged a 41.6KV supporting cross arm which came in contact with 115KV transmission lines. This event impacted 569 customers in Barry, Beardsley, and Browns Valley for the duration of 41 minutes.

G. REPORTING MAJOR SERVICE INTERRUPTIONS

Minnesota Rule 7826.0500, Subpart 1g, requires utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions.

Minnesota Rule 7826.0500, Subpart 1g, requires utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions. On December 18, 2020, the Minnesota Public Utilities Commission issued an order in Docket No. E017/M-20-401 granting a variance to Minnesota Rule 7826.0500, Subpart 1g. Otter Tail Power provides as required by this variance as Attachment 1, a summary table that includes the information contained in the reports.

This reporting was completed using our old Itron system at the feeder level. We are working with Milsoft (our OMS provider) to use OMS live data for reporting in the future.

H. CIRCUIT INTERRUPTION DATA

Minnesota Rule 7826.0500, Subparts 1h, requires utilities, to the extent technically feasible, to file circuit interruption data, including identifying the worst performing circuit in each work center, stating the criteria the utility used to identify the worst performing circuit, stating the circuit’s SAIDI, SAIFI, and CAIDI, explaining the reasons that the circuit’s performance is in last place, and describing any operational changes the utility has made, is considering, or intends to make to improve its performance.

In compliance with this rule, **Table 6** shows the worst performing circuit for each of Otter Tail Power’s four MN CSCs. Otter Tail Power continues to define a circuit as a distribution feeder and will use customer minutes as the criteria for identifying 2024 worst performers. Note, with the implementation of our OMS, the total sustained customer minutes are recorded at the customer level.

**Table 6
2024 MN Worst Performing Feeders**

Service Center	Substation Name	Feeder Description	Customers on Feeder	Total Sustained Customer Minutes
BEMIDJI	Bemidji 25th St Sub	North Feeder	1,235	442,975
CROOKSTON	Crookston UMN Sub	Park View West/East	1,933	314,204
FERGUS FALLS	Ottertail City Sub	North Feeder	723	429,573
MORRIS	Wheaton S. 115kV Sub	North Feeder	617	370,142

Bemidji CSC: The North Feeder fed from the Bemidji 25th St. Substation was the worst performing feeder in 2024 for the Bemidji CSC. This feeder, serving 1,235 customers, experienced 442,975 customer minutes in 2024. The most impactful interruption occurred on September 13, 2024, when a squirrel in the substation caused the breaker to open, resulting in a one hour and 54-minute interruption.

This feeder was last trimmed in Q1 of 2024 and will again be visited by crews and trimmed in 2025. Otter Tail Power is currently investigating upgrade options to improve the future performance of this feeder including possible animal guard installations at strategic locations.

Crookston CSC: The Park View West/East Feeder fed from the Crookston UMN Substation was the worst performing feeder in 2024 for the Crookston CSC. This feeder, serving 1,933 customers, experienced 314,204 customer minutes in 2024. The most impactful interruption occurred on August 29, 2024, when a tree came in contact with the line, causing a fuse cut out to blow. This interruption was 3 hours and 54 minutes.

This feeder was last partially trimmed in late 2023. Crews plan to revisit and finish the line in 2025. Also in 2025, aging underground primary conductors will be replaced as well as the installation of air flow spoilers for the prevention of galloping on overhead portions of the feeder.

Fergus Falls CSC: The North Feeder fed out of the Ottertail City Substation was the worst performing feeder in 2024 for the Fergus Falls CSC. This feeder has been a poor performer in the past years out of the Fergus Falls CSC. This feeder, serving 723 customers, experienced 429,573 customer minutes in 2024. The most impactful interruption occurred on December 18, 2024, due to equipment failure, when a line splice failed. This interruption was two hours and 55-minutes.

This feeder, which resides in a heavily wooded area was last trimmed late summer/fall of 2021. Several “hot spot” locations were trimmed in 2023. A project to replace an old section of underground primary was completed during the summer of 2021. A large project to replace existing overhead primary with underground cabling was largely completed in 2022. However, supply chain issues had delayed delivery of pad mount transformers to complete this project. Otter Tail Power took delivery of the transformers on January 20, 2024. This allowed for completion of this upgrade which was completed in late June of 2024. It is expected that this upgrade will provide much improvement in service in 2025 and beyond due to the heavily wooded area and feeder surroundings. Otter Tail Power has observed great improvements in other overhead to underground conversion projects and expect similar improvements on this feeder. Investigations into additional proactive maintenance activities continue to improve this feeder’s performance in the future.

Morris CSC: The North Feeder fed from the Wheaton S 115 kV Substation was the worst performing feeder in 2024 for the Morris CSC. This feeder was a repeat poor performer from 2023 for the Morris CSC. This feeder, serving 617 customers, experienced 370,142 customer minutes in 2024. The most impactful interruption occurred on April 2, 2024, as Otter Tail Power took a planned outage. During that outage, crews replaced cut outs in the city of Wheaton. Otter Tail Power also completed an overhead to underground distribution project as well as replaced a section of aging underground in November. This feeder was last trimmed in late October of 2024.

I. REPORT OF NOMINAL ELECTRIC SERVICE VOLTAGES

Minnesota Rule 7826.0500, Subpart 1i, requires that utilities shall file a report providing data on all known instances in which nominal electric service voltages on the utility’s side of the meter did not meet the stands of the American National Standards Institute for nominal system voltages greater or less than voltage range B.

Otter Tail Power provides, in **Table 7** below, the feeders and number of occurrences where the voltage fell outside the ANSI voltage range B. Most of the feeders, with numerous occurrences, are feeders with a single large customer that has a very large load. As discussed in Information Request, MN-DOC-006, of the 2022 Safety Reliability Service Quality Report (Docket No. E017/M-23-76) Otter Tail Power’s IMS (used to collect data) captures instantaneous voltage violations greater or less than voltage range B. Future reports will utilize data collected from our AMI system.

**Table 7
2024 MN Feeders and Number of Occurrences – Voltage fell outside the ANSI Voltage Range**

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Bemidji CSC	Feeder	0	2
Bemidji CSC	Feeder	0	2
Bemidji CSC	Feeder	0	2
Bemidji CSC	Main Feeder	0	1
Bemidji CSC	East Feeder	0	2
Bemidji CSC	North Feeder	0	2
Bemidji CSC	South Feeder	0	5
Bemidji CSC	Main Feeder	0	90
Bemidji CSC	Feeder	0	2
Bemidji CSC	Feeder	1	0
Bemidji CSC	Main Feeder	0	971
Bemidji CSC	Main Feeder	0	1
Bemidji CSC	Main Feeder	0	8
Bemidji CSC	Main Feeder	0	20
Bemidji CSC	Main Feeder	0	43
Bemidji CSC	East Feeder	0	11
Bemidji CSC	West Feeder	0	18
Bemidji CSC	South Feeder	0	1

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Bemidji CSC	Main Feeder	0	12
Bemidji CSC	Main Feeder	0	135
Bemidji CSC	Main Feeder	0	64
Bemidji CSC	Feeder	0	1,466
Bemidji CSC	Feeder	0	69
Bemidji CSC	North Feeder	0	375
Bemidji CSC	Main Feeder	0	2
Bemidji CSC	Feeder	2	2
Bemidji CSC	Feeder	0	2
Bemidji CSC	Main Feeder	9	15
Bemidji CSC	Main Feeder	0	2
Bemidji CSC	Main Feeder	0	3
Bemidji CSC	Main Feeder	0	2,005
Bemidji CSC	Main Feeder	0	4
Bemidji CSC	Main Feeder	0	31
Bemidji CSC	Main Feeder	0	4
Bemidji CSC	Main Feeder	0	3
Bemidji CSC	Main Feeder	0	2
Crookston CSC	Feeder	0	36
Crookston CSC	North Feeder	0	7,551
Crookston CSC	South Feeder	0	4,896
Crookston CSC	Main Feeder	0	22
Crookston CSC	East Feeder	2	1
Crookston CSC	North Feeder	2	4
Crookston CSC	Main Feeder	0	33,192
Crookston CSC	North Feeder	0	6
Crookston CSC	South Feeder	0	4
Crookston CSC	Main Feeder	2	12,212
Crookston CSC	Feeder	1	0
Crookston CSC	Main Feeder	0	6
Crookston CSC	Main Feeder	0	5
Crookston CSC	Main Feeder	0	4
Crookston CSC	Main Feeder	1	12
Crookston CSC	Main Feeder	0	15
Crookston CSC	Main Feeder	0	3
Crookston CSC	Main Feeder	0	225
Crookston CSC	East Feeder	0	67
Crookston CSC	West Feeder	0	16
Crookston CSC	Feeder	0	3

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Crookston CSC	Feeder	0	2
Crookston CSC	Main Feeder	0	52
Crookston CSC	Feeder	0	2
Crookston CSC	Main Feeder	0	99
Crookston CSC	Main Feeder	0	3
Crookston CSC	Main Feeder	1	7,471
Crookston CSC	North Feeder	0	1,613
Crookston CSC	South Feeder	0	32
Crookston CSC	Main Feeder	0	28
Crookston CSC	Main Feeder	0	4
Crookston CSC	Main Feeder	2	4
Crookston CSC	Main Feeder	0	1
Crookston CSC	Main Feeder	0	1
Crookston CSC	East Feeder	3	4
Crookston CSC	West Feeder	29	6
Crookston CSC	Main Feeder	3	4
Crookston CSC	North Feeder	0	21,873
Crookston CSC	South Feeder	0	24,413
Crookston CSC	Feeder	0	10,564
Crookston CSC	Main Feeder	0	3
Crookston CSC	Main Feeder	0	6
Fergus Falls CSC	Main Feeder	0	5
Fergus Falls CSC	Feeder	1	10
Fergus Falls CSC	Feeder	1	13
Fergus Falls CSC	North Feeder	0	14
Fergus Falls CSC	South Feeder	0	10
Fergus Falls CSC	Feeder	0	11
Fergus Falls CSC	Feeder	50	29
Fergus Falls CSC	Main Feeder	0	131
Fergus Falls CSC	Feeder	0	402
Fergus Falls CSC	Feeder	0	832
Fergus Falls CSC	Main Feeder	0	79
Fergus Falls CSC	Main Feeder	0	3
Fergus Falls CSC	Main Feeder	0	973
Fergus Falls CSC	Main Feeder	0	345
Fergus Falls CSC	Main Feeder	0	2
Fergus Falls CSC	Feeder	0	221
Fergus Falls CSC	Feeder	0	242
Fergus Falls CSC	Main Feeder	0	10

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Fergus Falls CSC	Main Feeder	0	17
Fergus Falls CSC	Main Feeder	0	361
Fergus Falls CSC	East Feeder	0	24
Fergus Falls CSC	West Feeder	0	13
Fergus Falls CSC	Feeder	10	58
Fergus Falls CSC	Feeder	0	1
Fergus Falls CSC	Feeder	0	178
Fergus Falls CSC	Feeder	0	18
Fergus Falls CSC	Feeder	0	979
Fergus Falls CSC	East Feeder	0	4
Fergus Falls CSC	Feeder	1	10
Fergus Falls CSC	Feeder	0	4
Fergus Falls CSC	Feeder	0	4
Fergus Falls CSC	Feeder	0	9
Fergus Falls CSC	Feeder	0	825
Fergus Falls CSC	Feeder	0	1
Fergus Falls CSC	West Feeder	0	1
Fergus Falls CSC	Main Feeder	1	13,334
Fergus Falls CSC	South Feeder	229	5
Fergus Falls CSC	South Feeder	0	721
Fergus Falls CSC	Feeder	0	13,872
Fergus Falls CSC	Feeder	0	58
Fergus Falls CSC	Feeder	0	1,117
Fergus Falls CSC	Main Feeder	0	207
Fergus Falls CSC	Main Feeder	0	3
Fergus Falls CSC	Feeder	0	3
Fergus Falls CSC	Feeder	1	0
Fergus Falls CSC	North Feeder	0	2
Fergus Falls CSC	South Feeder	0	35,300
Fergus Falls CSC	East Feeder	4	50
Fergus Falls CSC	North Feeder	2	42
Fergus Falls CSC	North Feeder	1	418
Fergus Falls CSC	South Feeder	0	26
Fergus Falls CSC	East Feeder	1	11
Fergus Falls CSC	Feeder	0	113
Fergus Falls CSC	West Feeder	0	8
Fergus Falls CSC	East Feeder	2	0
Fergus Falls CSC	Feeder	749	10,503

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Fergus Falls CSC	Feeder	4	4,240
Fergus Falls CSC	Main Feeder	0	5
Fergus Falls CSC	Main Feeder	0	12
Fergus Falls CSC	Main Feeder	0	16,759
Fergus Falls CSC	Main Feeder	1	1
Fergus Falls CSC	Feeder	2	15,546
Fergus Falls CSC	Feeder	1	209
Fergus Falls CSC	Main Feeder	0	9
Fergus Falls CSC	Main Feeder	1	1
Fergus Falls CSC	Main Feeder	5	13
Morris CSC	Main Feeder	0	2
Morris CSC	North Feeder	0	7
Morris CSC	Main Feeder	0	1
Morris CSC	Main Feeder	75	0
Morris CSC	North Feeder	0	110
Morris CSC	South Feeder	0	41
Morris CSC	Main Feeder	1	2
Morris CSC	East Feeder	0	18
Morris CSC	West Feeder	0	7
Morris CSC	Main Feeder	0	11
Morris CSC	Main Feeder	0	4
Morris CSC	East Feeder	0	5,173
Morris CSC	Feeder	0	4,521
Morris CSC	West Feeder	0	3,926
Morris CSC	Main Feeder	0	1
Morris CSC	Main Feeder	0	2
Morris CSC	Main Feeder	0	1
Morris CSC	Main Feeder	0	34
Morris CSC	Main Feeder	0	3
Morris CSC	Main Feeder	0	3
Morris CSC	Main Feeder	0	26
Morris CSC	East Feeder	0	1
Morris CSC	West Feeder	0	1
Morris CSC	East Feeder	25	0
Morris CSC	Feeder	0	3
Morris CSC	Feeder	0	1
Morris CSC	Main Feeder	0	57
Morris CSC	Main Feeder	0	1

CSC	Feeder	Events - Instantaneous Voltage	
		Number of Volt(RMS) Below Threshold Events (E6)	Number of Volt(RMS) Above Threshold Events (E7)
Morris CSC	Main Feeder	0	2
Morris CSC	Main Feeder	0	11
Morris CSC	North Feeder	0	2
Morris CSC	South Feeder	0	2
Morris CSC	Feeder	0	3
Morris CSC	Main Feeder	1	13
Morris CSC	Main Feeder	0	13
Morris CSC	West Feeder	0	2
Morris CSC	Main Feeder	0	4
Morris CSC	North Feeder	0	2
Morris CSC	South Feeder	0	16
Morris CSC	West Feeder	0	5
Morris CSC	Feeder	0	1
Morris CSC	Main Feeder	0	8
Morris CSC	East Feeder	0	34
Morris CSC	West Feeder	0	22
Morris CSC	East Feeder	0	3
Morris CSC	Feeder	0	20
Morris CSC	East Feeder	0	1
Morris CSC	Main Feeder	0	23
Morris CSC	West Feeder	0	1
Morris CSC	Feeder	0	4
Morris CSC	Feeder	0	18
Morris CSC	East Feeder	1	1
Morris CSC	West Feeder	0	1
Morris CSC	Main Feeder	0	32
Morris CSC	Main Feeder	0	894
Morris CSC	Main Feeder	1	13
Morris CSC	South Feeder	96	22,488
Morris CSC	Feeder	0	8
Morris CSC	Feeder	0	11
Morris CSC	Main Feeder	0	1
Morris CSC	Feeder	0	1
Morris CSC	Feeder	18	1
Morris CSC	Main Feeder	0	28
Morris CSC	South Feeder	0	1
Rugby CSC	Main Feeder	1	1
		1,344	285,917

J. STAFFING LEVELS AT EACH WORK CENTER

Minnesota Rule 7826.0500, Reliability Reporting Requirements, Subpart 1j, requires utilities to file a report providing data on staffing levels at each work center, including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines.

In compliance with this rule, Otter Tail Power reports staffing levels by CSC including the number of full-time equivalent positions held by field employees responsible for responding to trouble and for the operation and maintenance of distribution lines. The staffing levels of Otter Tail Power’s Minnesota CSCs as of December 31, 2024, are shown in **Table 8** below.

Table 8

Department	Type	Total
Bemidji	Field	17
	Office	3
Bemidji Total		20
Crookston	Field	19
	Office	2
Crookston Total		21
Fergus Falls	Field	26
	Office	2
Fergus Falls Total		28
Morris	Field	25
	Office	4
Morris Total		28
Operations Support	Field	5
	Office	1
Operations Support Total		6
System Infra/Reliability	Office	8
System Infra/Reliability Total		8
Substation Maintenance	Field	12
	Office	1
Substation Maintenance Total		13
Customer Care & Relations	Office	30
Customer Care & Relations Total		30
12/31/2024		154

The Fergus Falls CSC includes one field personnel and one office employee that are located in our Wahpeton CSC. Our Wahpeton CSC serves communities in Minnesota. The additional employees into the Fergus Falls CSC count are responsible for responding to trouble and for the operation and maintenance of distribution lines.

The Morris CSC includes three field personnel and three office employee that are located in our Milbank CSC. Our Milbank CSC serves communities in Minnesota. The additional employees into the Morris CSC count are responsible for responding to trouble and for the operation and maintenance of distribution lines.

Operations Support is based in Fergus Falls and the field employees are dispatched to assist CSCs in need throughout the entire system. The office employees coordinate resources.

Substation Maintenance is a department with employees that work in substations and with substation related equipment. During trouble they are dispatched to complete switching and other work associated with substation equipment.

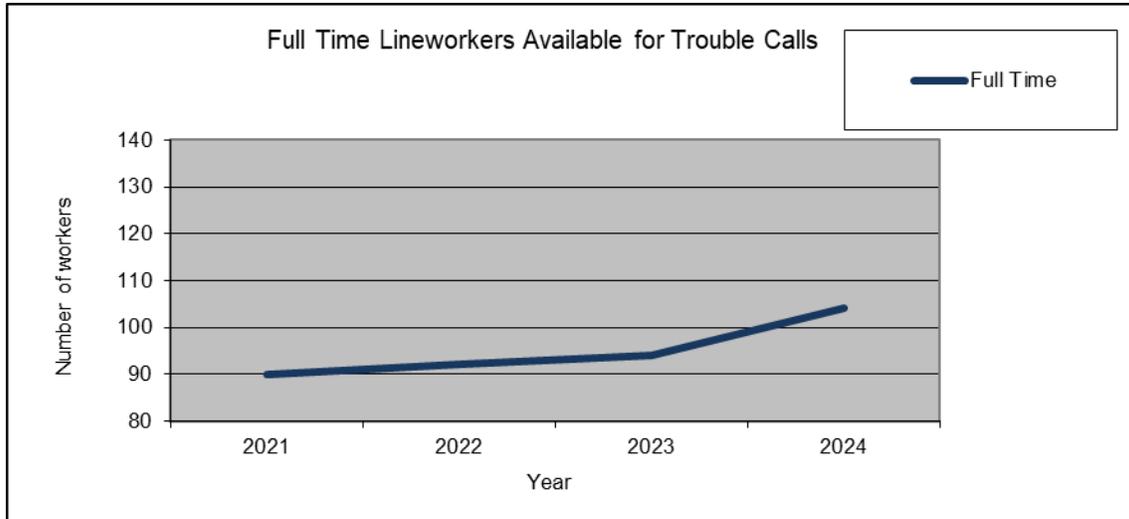
Customer Care and Relations is the office staff that is made up of Customer Service Representatives, Senior Customer Service Representatives, Outage Management System Operators and Customer Service Management that are located in CSCs throughout our service territory. Since Otter Tail Power operates a Virtual Call Center, all the office staff located throughout the territory are accountable for answering outage calls in all states. The employee count for Customer Care and Relations is 39.

System Infrastructure and Reliability consists of Area Engineers that assist with overall outage restoration efforts including distribution and supports system reliability.

Figure 6 depicts by year the number of full-time line workers available for trouble and for the operation and maintenance of distribution lines.

As stated in Otter Tail Power's Electric Utility Infrastructure Costs (EUIC) filing in docket E017/M-21-382 filed on June 7, 2021, with AMI implementation, between now and 2032, Otter Tail Power anticipates seeing employee reductions. This will be largely due to automation, which will almost eliminate the need for employees to physically read customer meters. This reduction is expected to be accomplished through attrition and reassignment of personnel.

Figure 6



K. OTHER INFORMATION RELEVANT IN EVALUATING RELIABILITY PERFORMANCE

Minnesota Rule 7826.0500, Subpart 1k, requires utilities to file any other information the utility considers relevant in evaluating its reliability performance over the calendar year.

This is Otter Tail Power’s first year utilizing our new Outage Management System (OMS), for reliability monitoring/reporting and purposes of data collection. The OMS is integrated to our GIS system map and utilizes interactive voice response, IVR, technology to assist our OMS operators and designate the location, extent and size of the interruption. Field service worker input is used in customer communications regarding status, ETOR, etc. The OMS has improved the way in which outage information is organized and summarized for Otter Tail Power crews, improving response and restoration times (CAIDI).

Otter Tail Power has the unique challenge of delivering reliable services to its customers across a large rural service territory, which has tremendous exposure to hazards such as vegetation, lightning, wind, and other weather-related issues. Our OMS deployment and the use of power quality meters will continue to provide optimized and focused deployment of our vegetation management and maintenance resources to specific areas that are identified through the interruption data collection and analysis processes.

Otter Tail Power is implementing system wide AMI meter technology with estimated completion in 2025, giving us customer level data. This technology implementation will provide advanced grid analytic capabilities. Otter Tail Power will also be investigating new technology capabilities integrated within all newly installed AMI meters, providing the potential for sub cycle power quality analysis and possible total harmonic distortion (THD) analysis. Otter Tail Power has also expanded the reliability engineering workforce to focus on these new technologies and future benefits to our customers. Otter Tail Power continues to utilize the following tools and upgrade processes.

1. **Power Quality monitoring improvements:** Otter Tail Power continues to install and utilize wireless power quality monitors in identified problem areas. To date, Otter Tail Power has 118 monitors deployed across the system. These devices monitor voltage, current, power, voltage unbalance, histograms, profiles, etc. in near real-time. Monitors also can gather sub cycle data for transient, harmonic, etc. analysis. These monitors have greatly improved our ability to monitor, identify, and analyze issues in the field.

2. **Measuring reliability:** Otter Tail Power continues to evaluate alternate indices and the subsequent relationship towards reliability, system resilience, and customer satisfaction tracking. Our Itron interruption monitoring system historically has had the capability to monitor the following indices: SAIFI, SAIDI, CAIDI, CTAIDI, CAIFI, ASAI, CEMI-5, CELID-s60, MAIFI, MAIFe, CEMSMI-5, and total sustained customer minutes. With the adoption of our new OMS, Otter Tail Power will take another step forward in its ability to improve performance due to the application of additional and better field and system data. Although, some of the indices Otter Tail Power currently had available will need to be developed over time within the OMS as we continue improvements within our new system. Indices reporting for our 2024 SRSQ filing utilizes our OMS. Future, AMI power off and power on notifications from each Customer meter will take Otter Tail Power's reliability reporting another step forward.

3. **Grid Resilience:** Otter Tail Power maintains a focus on investing into various system wide programs to improve grid resilience and reliability. Over the past 4-6 years, Otter Tail Power has increased programs associated with replacement of aging assets by nearly 2x. For more information regarding these programs and spending levels, please visit Otter Tail Power's 2023 Minnesota Integrated Distribution Plan (Docket No. E017/RP-23-380).

Figures 7, 8, and 9. The following graphs show Otter Tail Power’s Normalized SAIDI, SAIFI and CAIDI for the period of 2020 through 2024. 2024 data shown was collected with our new OMS.

Figure 7

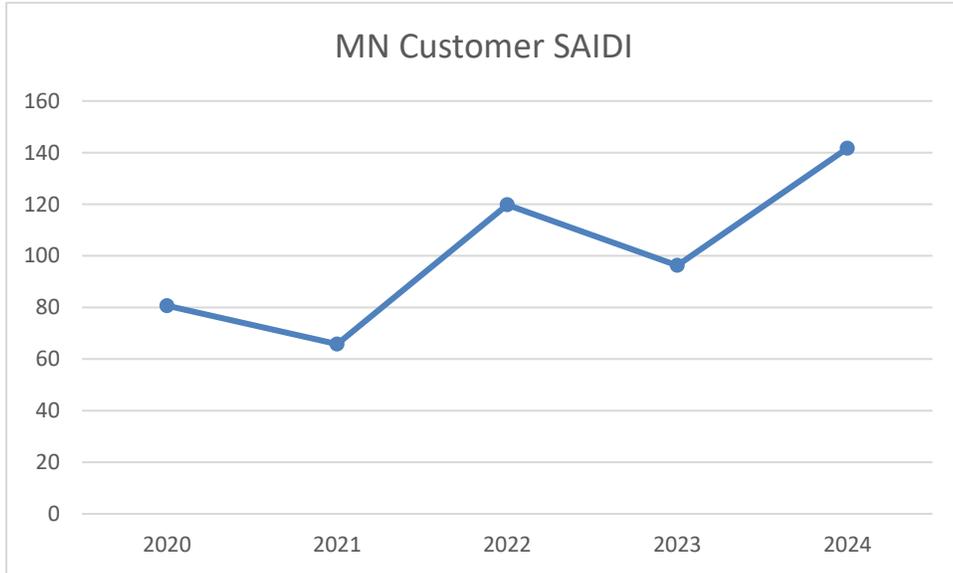


Figure 8

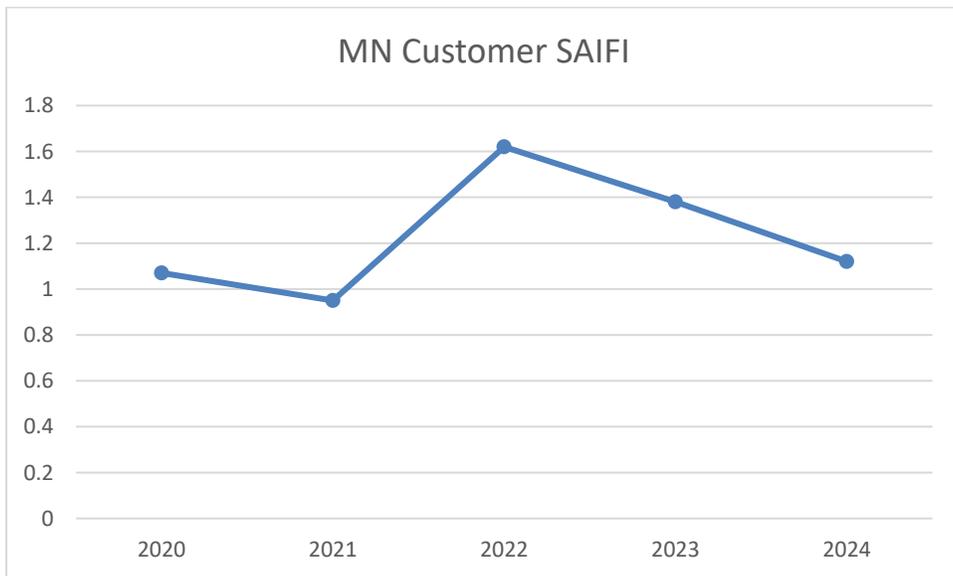
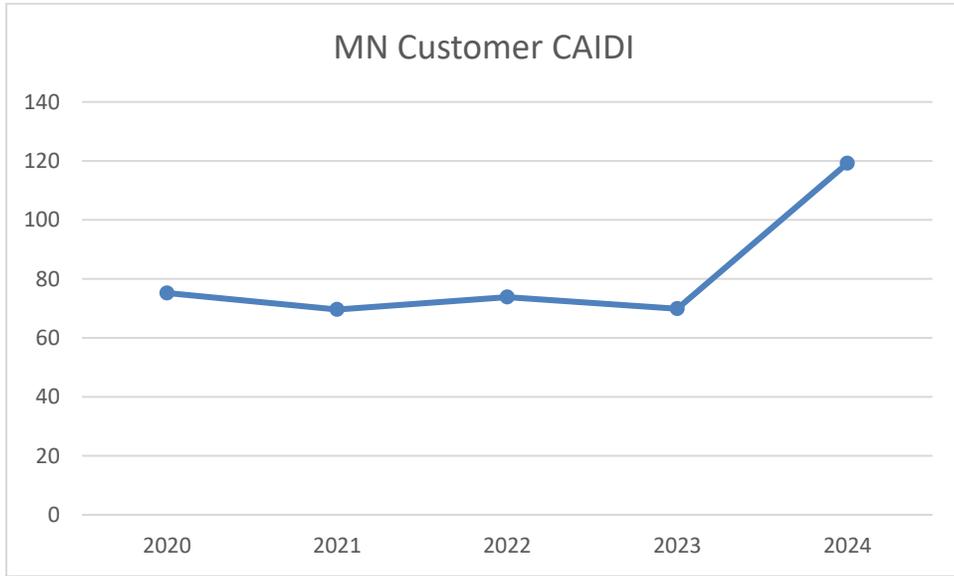


Figure 9



L. OTTER TAIL POWER POLICIES, PROCEDURES, AND ADDITIONAL COMPLIANCE OBLIGATIONS

Otter Tail Power provides the following description of the policies and procedures that it has previously implemented and continues to utilize to improve reliability. Additional compliance obligation requirements are also provided.

The following is a list of reports that continue to be distributed internally. These reports ensure that Otter Tail Power employees are aware of issues in the system on a timely basis and can respond quickly to maintain and improve overall system reliability.

1. Internal Reporting

- a. **Monthly Reliability Report:** Otter Tail Power distributes to all employees an overall summary of system performance as compared to internal KPI's. This report shows SAIDI, SAIFI, CAIDI, and MAIFI for the system. As discussed, Otter Tail Power has begun utilizing our new OMS for 2024 monthly reporting for sustained interruptions. For 2025, our Landis & Gyr AMI system will be used to track MAIFI.
- b. **Additional reporting:** Otter Tail Power will continue to evaluate and track other indices in 2025 and develop internal KPI's that are reported and published to Otter Tail Power's Asset Management and Customer Service Departments.

2. Proactive Inspections and Testing

- a. **Field Inspections:** Otter Tail Power conducts several periodic patrols and inspections throughout the transmission and distribution system. Transmission substations and lines are inspected and patrolled on an annual basis and more often when issues are identified. Distribution substations are inspected for safety and equipment concerns on a periodic basis. The oil in substation transformers is sampled and tested for dissolved gas. Transformers greater than 10 MVA are tested annually and transformers less than 10 MVA are tested every three years.
- b. **Pole integrity testing:** Otter Tail Power currently contracts for ground line inspections and treatment work of aged transmission and distribution poles for replacement identification. Otter Tail Power uses a 24-month replacement requirement on "standard" reject poles and six-month replacement requirement on "priority" rejects.
- c. **Underground Replacement:** Otter Tail Power continues its focus on replacing outdated and failing underground conductors. The Area Engineers proactively identify areas of concern and budget for replacement during the following year. Potential replacement

candidates are identified and included in Otter Tail Power's Proactive UG Replacement project listing. The recently collected distribution data by the third party discussed earlier is also used to help identify cable sections for replacement. Also, our OMS is now being used to locate and find UG sections with multiple failures as candidates for replacement. Otter Tail Power has greatly increased funding for this program over the past several years.

d. Cut-Out Replacement Program: In 2022, Otter Tail Power started a cut-out replacement program to replace failing porcelain cut-outs as well as add animal protection to poles and other distribution assets. This initiative is planned to continue throughout the 5-year planning horizon with a goal to replace all porcelain cut-outs.

In addition to the above-mentioned items, Otter Tail Power also employs a number of other policies, procedures, and committees to evaluate reliability and safety concerns that include, but are not limited to:

- Transmission and Distribution Standards Committee
- Fleet and Tooling Committee
- Line inspections
- Workforce Planning Committee
- Transformer Installation and Change-out Loading Guide
- Voltage upgrades and evaluations as needed
- Mobile underground fault locating vans and associated equipment
- Wildlife protection and deterrent devices

The following are additional compliance obligation requirements.

3. Attachment B: Updated Annual Reporting Requirements (Clarifications to March 2019 Order Requirements) of January 28, 2020 PUC Order in Docket No. E017/M-19-260

a. Attachment B paragraph 1: *Non-normalized SAIDI, SAIFI, and CAIDI values.*

These are previously shown in section IV, A-D, Table 4a.

b. Attachment B paragraph 2: *SAIDI, SAIFI, and CAIDI, MAIFI, CEMI, and CELI normalized values calculated using the IEEE 1366 Standard.*

SAIDI, SAIFI, and CAIDI values are previously shown in section IV, A-D, at Table 4. MAIFI non-normalized values are previously shown in section II at Table 1. As well as Section c, at Table 9 below. CEMI, and CELI normalized values follow in section d, at Table 10 and 11.

c. Attachment B paragraph 3: *MAIFI – normalized and non-normalized.*

Otter Tail Power’s OMS does not have the capability to monitor momentary interruptions. 2024 data is gathered from our Itron IMS meters that were maintained in Minnesota through 2024. The numbers presented are non-normalized as transition towards AMI didn’t allow for an IMS audit process or storm normalization. Future MAIFI results will come from our Landis & Gyr AMI system and provide data at the customer level.

Table 9

Non-Normalized	2024
CSC	MAIFI
Bemidji	3.21
Crookston	4.86
Fergus Falls	3.76
Morris	3.26
MN Total	3.7

- d. Attachment B paragraph 4:** CEMI – at normalized and non-normalized outage levels of 4, 5, and 6 interruptions.

Table 10

2024 Normalized CEMI

CEMI 4	5.8271%
CEMI 5	1.8053%
CEMI 6	0.8958%

Table 10a

2024 Non-Normalized CEMI

CEMI 4	6.0793%
CEMI 5	2.1034%
CEMI 6	0.9477%

- e. Attachment B paragraph 5:** The highest number of interruptions experienced by any one customer (or feeder, if customer level is not available).

Three customers experienced 13 interruptions: the highest number of interruptions experienced by any MN customer in 2024. Each of these three customers are downstream of the Perham SE feeder. Causes identified for these interruptions:

- Equipment failure – 3
- Tree in line – 3
- Lightning – 2
- Animal – 2
- Unknown/No cause code – 2
- Public caused – 1

- f. Attachment B paragraph 6:** CELI – at normalized and non-normalized intervals of greater than 6 hours, 12 hours, and 24 hours.

Table 11

2024 Normalized CELID

CELID 6	11.9323%
CELID 12	2.1890%
CELID 24	0.1315%

Table 11a

2024 Non-Normalized CELID	
CELID 6	11.9858%
CELID 12	2.1890%
CELID 24	0.1315%

g. Attachment B paragraph 7: *The longest experienced interruption by any one customer (or feeder, if customer level is not available).*

39 customers experienced an interruption lasting for 907 minutes (15h 7min) downstream of feeder MORRIS 115 KV SUB – SOUTH due to bad underground on November 29, 2024.

h. Attachment B paragraph 8: *A breakdown of field versus office staff as required Minn. Rules 7826.0500, Subp. 1, J, including separate information on the number of contractors for each work center.*

Previously shown in section IV, J, Table 8. Otter Tail Power does not utilize contractors for these services.

i. Attachment B paragraph 9: *Estimated restoration time accuracy, using the following windows:*

- a. Within -90 minutes to 0 of estimated restoration time*
- b. Within 0 to +30 minutes of estimated restoration time*

Otter Tail Power implemented an Outage Management System (OMS) in December of 2022. Scale up, training, and persistent system optimization continues. For purposes of the 2025 SRSQ filing based on 2024 data, we can provide the Commission with information on what our customers experienced. Through online subscription, currently more than 40,000 customers (representing all three states we serve) are requesting and receiving ETOR information by text, email or push notifications.

As we continue to scale up, train and optimize our OMS processes, 2024 realized approximately 1.00 percent of field and operator input into ETOR following site/event inspection. This is a tremendous improvement over 2023 (50%). In cases where ETOR was not entered, a default of our system KPI CAIDI goal was used as a default entry. Below is an account of actual restorations compared to both field entered and default ETOR from our OMS.

Table 12

2024 ETOR Accuracy	
Less than 90 min	20.08%
-90 to 0 min	50.26%
0 to 30 min	9.40%
+30 min	20.26%

j. Attachment B paragraph 11: Performance by customer class

If reporting by class is not yet possible, an explanation of when the utility will have this capability.

Otter Tail Power is not able to provide 2024 performance by class reporting in this report. At the time of the report preparation, the OMS report generation program is not functional. Otter Tail Power is currently working with our software/programming contractor to fix the issues.

k. Attachment B paragraph 12: Causes of sustained customer outages, by work center.

Previously shown in section IV, A-D, Table 5.

4. December 18, 2020 PUC Order in Docket No. E017/M-20-401 (2019 Annual SRSQ Report)

a. Ordering paragraph 4: *The Commission hereby grants a variance to Minn. R. 7826.0500, Subp. 1, item G, applicable to Minnesota Power, Otter Tail, and Xcel. The utilities must file a summary table that includes the information contained in the reports, similar to Attachment G of Xcel's filing.*

This variance was referenced previously at section IV, G and the summary is included as Attachment 1 to this report.

b. Ordering paragraph 5: *The utilities must file the reliability (SAIDI, SAIFI, CAIDI, MAIFI, normalized/non-normalized) for feeders with grid modernization investments such as Advanced Metering Infrastructure or Fault Location Isolation and Service Restoration to the historic five-year average reliability for the same feeders before grid modernization investments.*

This is not applicable for Otter Tail Power at this time given the company did not have AMI installed for most customers throughout 2024 nor does it have FLISR installed. Otter Tail Power began full scale AMI installations in February of 2024 and estimated completion is expected in mid-2025.

c. Ordering paragraph 16: *After consultation with Department and Commission staff, each utility must file revised categories for reporting complaint data. The Commission hereby delegates authority to the Executive Secretary to approve additional reporting categories, with the goal of establishing them by the April 1, 2021 reporting deadline.*

See section XII, A & B below for a work group summary.

5. December 2, 2021 PUC Service Quality Order in Docket No. E017/M-21-225 (2020 Annual SRSQ Report)

a. Ordering paragraph 2: *Required Minnesota Power, Otter Tail Power, and Xcel Energy to provide the following new information regarding electronic utility-customer interaction beginning with the reports filed in April 2023:*

Table 13

2024 Percentage Uptime		
	General Website	99.92%
	Payment Services	99.90%
	Third-party web payment services	100.00%
	Outage map &/or Outage Info page	100.00%
Error Rate Percentage		
	Payment Services	0.10%

In 2024 Otter Tail Power moved away from using Alert Bot to record website uptime. We have moved to a new service however the look back with the new service is only for 90 days. To ensure we can provide a yearly view, Otter Tail Power will be collecting this information every 90 days to comply with this requirement.

If more granular data is available, please break down the error rate for unexpected errors, errors outside of the customer’s control (i.e. how often to online payments fail for reasons other than insufficient funds or expired payment methods), and/or some other meaningful categorization.

We were unable to obtain more granular data regarding the types of errors.

- b. Ordering paragraph 3:** *Required Minnesota Power, Otter Tail Power, and Xcel Energy to provide percentage uptime and error rate percentage information in their annual reports for the next three reporting cycles, to build baselines for web-based service metrics.*

We were unable to obtain more granular data.

- c. Ordering paragraph 4:** *Required Minnesota Power, Otter Tail Power, and Xcel Energy to continue to provide information on electronic utility-customer interaction such that baseline data are collected:*
 - a. Yearly total number of website visits;*
 - b. Yearly total number of logins via electronic customer communication platforms;*
 - c. Yearly total number of emails or other customer service electronic communications received; and*
 - d. Categorization of email subject, and electronic customer service communications by subject, including categories for communications related to assistance programs and disconnections as part of reporting under Minn. R.7826.1700.*

Table 14 below is a count of customer requests from our self-service area within our website. The information within the table is broken out by our categories on our website. These requests create an issue for our office team to complete the transaction for our customers. We were unable to separate this information by state. The information in this table represents inquiries from our entire service territory.

Table 14

2024 Service Request Type	Total
Connect Service Request	12
Web Address Change Request	1,467
Web Phone Number Change Request	635
Web Start Service - My Meter	1,966
Web Stop Service - My Meter	1,346
Web Transfer Service - My Meter	134
Grand Total	5,560

Table 15 below is a count of our Minnesota customer contacts that were submitted through our Contact Us section within our website. Contact Us is the area on our website where customers can ask their questions and engage in dialogue via email. When a customer utilizes the Contact Us feature, they are prompted to choose a topic as the subject for their inquiry. Below are the number of our 2024 Contact Us emails by topic.

Table 15

2024 Contact Us Topic	Topic Count
Otter Tail Investments	7
Energy Assistance Program Information	11
Employment Opportunities	15
Generation interconnection	7
Outdoor lighting	15
Enroll in EMP	385
Rebates and Financing Information	49
Energy control	40
Economic development	4
My account	626
General Inquiries	313
Grand Total	1,472

Table 16 below is a count of our website visits and logins for our various customer communication platforms. The information in this table represents our entire service territory.

Table 16

2024 Electronic Customer Communications		
Website	4,167,356	Webpage Views
Facebook	47,400	Page Visits
	623	New Page Likes
	552.3K	Page Reach
Linkedin	6,791	Desktop Page views
	2,770	Mobile Page Views
	3,509	Unique Visitors
	462	New Followers
MyMeter	500,130	Yearly Log ins

- d. Ordering paragraph 7:** *Required Minnesota Power, Otter Tail Power, and Xcel Energy to file public facing summaries with their annual Safety, Reliability, and Service Quality reports. Utilities shall work with the Executive Secretary to publish those summaries in locations visible to consumers.*

Otter Tail Power's 2024 Public Facing Summary is included as Attachment 2 and has been published on our website at otpc.com/help-center/ as a left-hand navigation option.

6. March 2, 2022 PUC Service Quality Order in Docket No. E017/M-21-225 (2020 Annual SRSQ Report)

- a. Ordering paragraph 5:** *The Commission sets Otter Tail Power's 2021 statewide reliability standard at the IEEE benchmarking second quartile for medium utilities and sets work center reliability standards at the IEEE benchmarking second quartile for medium utilities.*
- b. Ordering paragraph 6:** *Otter Tail must file a supplemental filing to its 2021 safety, service quality, and reliability report 30 days after IEEE publishes the 2021 benchmarking results. The supplemental filing must include an explanation for any standards the utility did not meet.*

Response to a and b above: Otter Tail Power will provide a supplemental filing within 30 days from when IEEE publishes the 2024 benchmarking results. Otter Tail Power will compare its results with the median values of SAIFI, SAIDI, and CAIDI for "medium" sized utilities as reported in the survey results and provide explanations for standards not met.

7. November 9, 2022 PUC Service Quality Order in Docket No. E017/M-22-159 (2021 Annual SRSQ Report)

- a. Ordering paragraph 8:** *Required Xcel Energy, Minnesota Power, and Otter Tail Power to each display, either directly or via a link to a PDF file, the utility's public facing summary, as shown in Attachment A, on the utility's website placed such that the summary is available to a website user after a single click away from the home page.*

Otter Tail Power's 2024 Public Facing Summary is included as Attachment 2 and has been published on our website at otpc.com/help-center/ as a left-hand navigation option.

8. January 13, 2025 PUC Service Quality Order in Docket No. E017/M-24-30 (2023 Annual SRSQ Report)

- a. *Ordering paragraph 8:*** *Minnesota Power and Otter Tail Power must include a discussion on alternative approaches to reliability standard setting in their 2024 safety, reliability, and service quality reports.*

Otter Tail Power collected its first full year of OMS data in 2023. We continue to improve the process of data collection, reporting and are currently formalizing our audit plans to improve accuracy. Data gathering from our AMI implementation begins in 2025 and will provide checks and balances to our OMS data. Otter Tail Power believes it could revert (back) to setting reliability standards based on historic performance, but not until we have adequate annual history with both AMI and OMS integrated.

- b. *Ordering Paragraph 9:*** *Minnesota Power and Otter Tail Power must include a discussion on the IEEE reporting sample size and data exclusion challenges from this year.*

The IEEE 2023 Benchmark Reliability Survey was completed July 23, 2024. It did not include analysis of small, medium and large utilities. Otter Tail Power provided its response regarding Docket No. E017/M-24-30, on August 15, 2024, even though it was incomplete, as we weren't aware of future IEEE updates. IEEE updated its Benchmark Results on September 18, 2024, which included utility size breakdowns. Otter Tail Power responded with an amended supplemental filing on September 26, 2024.

With that, the added activity/work for both the MPUC and Otter Tail Power was disappointing. Otter Tail Power also noticed a decline in Utility participation over the last few years.

Otter Tail Power does not have a corporate membership in IEEE and does not participate in the survey. Otter Tail Power does have membership with EEI and has been participating

- c. *Ordering paragraph 10:*** *Minnesota Power and Otter Tail power must include a discussion of using the EIA 861 data to benchmark utility reliability performance.*

Otter Tail Power has submitted EIA – 861 Distribution System Information and Distribution Reliability Data by state (MN, ND, SD) since at least 2014's data year. Otter Tail Power's Reliability Engineer has been contacted by analysts for EIA's energy reliability data in the past with clarification questions regarding our data submissions. Otter Tail Power would be open to exploring the use of utilizing EIA – 861 benchmark data available for purposes of reliability performance comparisons.

d. Ordering paragraph 11: *Otter Tail Power must include in its 2024 safety, reliability, and service quality report performance data for 2024 from both its Interruption Monitoring System (IMS) and their Outage Management System (OMS), if available.*

2024 will be the last year IMS data is available. It is provided below along with data from our OMS. The IMS was at the feeder level. OMS collects data at the customer level and much more data is collected beyond the feeder breaker.

Table 17

Normalized 2024	OMS			Itron IMS		
	SAIFI	SAIDI	CAIDI	SAIFI	SAIDI	CAIDI
CSC						
Bemidji	1.05	114.77	109.75	1.51	89.17	59.06
Crookston	0.81	108.2	133.73	1.28	177.07	138.09
Fergus Falls	1.57	220.37	140.44	1.01	90.07	89.41
Morris	0.8	108.74	135.72	0.89	92.24	103.07
MN Total	1.16	141.55	122.22	1.08	107.59	98.86

Table 18

Non-Normalized	2024	OMS			Itron IMS		
		SAIFI	SAIDI	CAIDI	SAIFI	SAIDI	CAIDI
CSC							
Bemidji	1.1	117.87	107.36	1.51	89.17	59.06	
Crookston	0.81	108.31	133.66	1.28	177.07	138.09	
Fergus Falls	1.57	220.69	140.44	1.01	90.07	89.41	
Morris	0.8	108.74	135.72	0.89	92.24	103.07	
MN Total	1.18	153.23	129.73	1.08	110.33	121.45	

V. RELIABILITY STANDARDS 7826.0600

PROPOSED RELIABILITY PERFORMANCE STANDARDS

Minnesota Rule 7826.0600, Subpart 1, requires utilities to file proposed reliability performance standards in the form of proposed numerical values for the SAIDI, SAIFI, and CAIDI for each of its work centers.

Otter Tail Power does provide SAIDI, SAIFI, CAIDI and MAIFI 2023 results, compared to 2024. Keep in mind the data gathering transition from IMS to OMS.

As previously discussed, Otter Tail Power implemented an Outage Management System (OMS) in December of 2022 and continues to work through scale up efforts with the new system. The OMS will improve the way in which outage information is organized and summarized for Otter Tail Power crews, improving response and restoration times (CAIDI).

Otter Tail Power will set indices' standards at IEEE's Reliability Benchmark Survey median values for medium sized utilities for the corresponding year's data set, i. e. 2025 goals will be set on the 2024 IEEE Benchmark Survey results until further notice.

The current year report historically is completed, and results posted, the third quarter of the following year. As done in 2024, Otter Tail Power will provide a supplemental filing within 30 days from when IEEE's 2024 Benchmark Reliability Survey results are completed and provide explanations for standards not met.

VI. REPORTING METER-READING PERFORMANCE 7826.1400

Minnesota Rule 7826.1400, Reporting Meter Reading Performance, requires utilities to provide a detailed report on the utility’s meter-reading performance. In compliance with this rule, Otter Tail Power provides **Tables 19-22** for its meter reading performance for 2024.

A & B. The number and percentage of customer meters read by utility personnel and the number and percentage of customer meters self-read by the customer.

Table 19
Otter Tail Power Company Meter Reading Performance
January 1, 2024 to December 31, 2024
Residential – MN

Residential							
MONTH	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	62,016	96.07%	1,972	3.05%	564	0.87%	64,552
2	62,174	95.28%	2,450	3.75%	631	0.97%	65,255
3	71,255	98.09%	808	1.11%	579	0.80%	72,642
4	79,454	97.67%	1,403	1.72%	495	0.61%	81,352
5	72,376	97.27%	1,586	2.13%	442	0.59%	74,404
6	65,208	98.19%	803	1.21%	398	0.60%	66,409
7	63,842	98.29%	649	1.00%	460	0.71%	64,951
8	69,322	98.77%	522	0.74%	341	0.49%	70,185
9	81,189	99.59%	239	0.29%	98	0.12%	81,526
10	65,686	99.68%	133	0.20%	79	0.12%	65,898
11	64,033	99.63%	162	0.25%	75	0.12%	64,270
12	58,916	99.60%	173	0.29%	64	0.11%	59,153
Grand Total	815,471	98.18%	10,900	1.31%	4,226	0.51%	830,597

Table 20
 Otter Tail Power Company Meter Reading Performance
 January 1, 2024 to December 31, 2024
Small Commercial – MN

Small Commercial							
MONTH	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	12,496	96.74%	414	3.21%	7	0.05%	12,917
2	12,445	96.38%	463	3.59%	4	0.03%	12,912
3	12,783	98.94%	129	1.00%	8	0.06%	12,920
4	15,201	98.73%	192	1.25%	4	0.03%	15,397
5	16,078	99.01%	159	0.98%	2	0.01%	16,239
6	13,798	98.98%	139	1.00%	3	0.02%	13,940
7	13,085	98.66%	173	1.30%	5	0.04%	13,263
8	13,962	99.15%	118	0.84%	1	0.01%	14,081
9	15,396	99.40%	93	0.60%		0.00%	15,489
10	14,040	99.74%	36	0.26%	1	0.01%	14,077
11	12,924	99.56%	57	0.44%		0.00%	12,981
12	12,054	99.66%	41	0.34%		0.00%	12,095
Grand Total	164,262	98.77%	2,014	1.21%	35	0.02%	166,311

Table 21
 Otter Tail Power Company Meter Reading Performance
 January 1, 2024 to December 31, 2024
Large Commercial – MN

Large Commercial					
MONTH	Meters Read	%	Meters Estimated	%	Total Meters
1	743	96.62%	26	3.38%	769
2	745	97.26%	21	2.74%	766
3	759	98.70%	10	1.30%	769
4	761	98.96%	8	1.04%	769
5	834	98.82%	10	1.18%	844
6	798	99.25%	6	0.75%	804
7	748	97.78%	17	2.22%	765
8	843	99.29%	6	0.71%	849
9	829	99.04%	8	0.96%	837
10	857	99.42%	5	0.58%	862
11	786	99.62%	3	0.38%	789
12	685	99.28%	5	0.72%	690
Grand Total	9,388	98.69%	125	1.31%	9,513

Table 22
Otter Tail Power Company Meter Reading Performance
January 1, 2024 to December 31, 2024
Total – MN

System							
MONTH	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	75,255	96.19%	2,412	3.08%	571	0.73%	78,238
2	75,364	95.48%	2,934	3.72%	635	0.80%	78,933
3	84,797	98.22%	947	1.10%	587	0.68%	86,331
4	95,416	97.84%	1,603	1.64%	499	0.51%	97,518
5	89,288	97.60%	1,755	1.92%	444	0.49%	91,487
6	79,804	98.34%	948	1.17%	401	0.49%	81,153
7	77,675	98.35%	839	1.06%	465	0.59%	78,979
8	84,127	98.84%	646	0.76%	342	0.40%	85,115
9	97,414	99.55%	340	0.35%	98	0.10%	97,852
10	80,583	99.69%	174	0.22%	80	0.10%	80,837
11	77,743	99.62%	222	0.28%	75	0.10%	78,040
12	71,655	99.61%	219	0.30%	64	0.09%	71,938
Grand Total	989,121	98.28%	13,039	1.30%	4,261	0.42%	1,006,421

C. The number and percentage of customer meters that have not been read by utility personnel for periods of 6 to 12 months and for periods of longer than 12 months, and an explanation as to why they have not been read.

In 2024, Otter Tail Power had a total of five meters that had not been read for a period of 6 to 12 months. We encountered access issues due to meters being in locked buildings and animals obstructing access. All five of the meters were exchanged as a part of our AMI project which will positively impact our ability to obtain readings.

Otter Tail Power had no meters that were not read for period longer than 12 months.

D. Data on monthly meter-reading staffing levels, by work center or geographical area.

Table 23

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Grand Total
Customer Service Center													
Bemidji Customer Service Center	8	96											
Service Representative	8	8	8	8	8	8	8	8	8	8	8	8	96
Crookston Customer Service Center	11	132											
Apprentice Service Representative	1	1	1	1	1	1	1	1	1	1	1	1	12
Service Representative	10	10	10	10	10	10	10	10	10	10	10	10	120
Fergus Falls Customer Service Center	17	17	17	17	17	16	15	15	16	17	16	17	197
Apprentice Service Representative	1	1	1	1	1	1	1	1	1	1	1	1	12
Service Representative	16	16	16	16	16	15	14	14	15	16	15	16	185
Morris Customer Service Center	13	156											
Service Representative	13	13	13	13	13	13	13	13	13	13	13	13	156
Grand Total	49	49	49	49	49	48	47	47	48	49	48	49	581

Note: Milbank CSC and Wahpeton CSC serve Minnesota Communities where we read meters. The employees accountable for meter reading in those Minnesota communities have been included in the employee count in Morris and Fergus Falls.

Otter Tail Power utilizes its Service Representatives to read its meters on a monthly basis except in the following towns where a third party reads the Company's meters:

Alexandria MN	Erskine MN	Nashua MN
Amiret MN	Evansville MN	New York Mills MN
Argyle MN	Fergus Falls MN	Odessa MN
Ashby MN	Fertile MN	Ogema MN
Audubon MN	Fisher MN	Oklee MN
Battle Lake MN	Frazee MN	Oslo MN
Barry MN	Forada MN	Ottertail MN
Beardsley MN	Foxhome MN	Parkers Prairie MN
Bejou MN	Garfield MN	Pelican Rapids MN
Bellingham MN	Gary MN	Pennock MN
Beltrami MN	Gentily MN	Perham MN
Bemidji MN	Ghent MN	Plummer MN
Brandon MN	Graceville MN	Porter MN
Brooks MN	Green Valley MN	Red Lake Falls MN
Callaway MN	Gonvick MN	Richville MN
Campbell MN	Gully MN	Rothsay MN
Canby MN	Hancock MN	Saint Hilaire MN
Carlos MN	Hallock MN	Shevlin MN
Chokio MN	Henning MN	Solway MN
Clearbrook MN	Hitterdal MN	St. Leo MN
Climax, MN	Holloway MN	Sunburg MN
Clinton MN	Johnson MN	Taunton MN
Clitherall MN	Kent MN	Tenney MN
Correll MN	Kerkhoven MN	Tintah MN
Crookston MN	Lockhart MN	Trail MN
Cyrus MN	Louisburg MN	Twin Valley MN
Dalton MN	Mahnomen MN	Ulen MN
Danvers MN	Marshall MN (Rural)	Underwood MN
Dawson MN	McIntosh MN	Urbank MN
Dent MN	Mentor MN	Vergas MN
Deer Creek MN	Milan MN	Vining MN
Degraff MN	Millerville MN	Waubun MN
Detroit Lakes MN	Milroy MN	Wendell MN
Doran MN	Miltona MN	Wheaton MN
Dumont MN	Minneota MN	White Earth MN
Eldred MN	Morris MN	Wilton MN
Elizabeth MN	Murdock MN	Winger MN

At the outset of 2024, Otter Tail Power Company continued its contract with our third-party meter readers for the aforementioned towns. In February 2024, Otter Tail Power commenced the deployment of Advanced Metering Infrastructure (AMI) meters. As these meters were installed in various communities, we began importing readings directly from the AMI meters for billing, thereby eliminating the need for manual meter readings. The agreement for contracted meter reading services concluded in December 2024.

VII. REPORTING INVOLUNTARY DISCONNECTIONS 7826.1500

Minnesota Rule 7826.1500, Reporting Involuntary Disconnections, requires utilities to provide a detailed report on involuntary disconnections of service. In compliance with this rule, Otter Tail Power provides its report of involuntary disconnections of service.

A. Number of customers who received disconnection notices.

Table 24

Month	Large Commercial	Residential	Small Commercial	Grand Total
January	17	4592	384	4993
February	10	4239	363	4612
March	13	4349	347	4709
April	10	4133	372	4515
May	11	4008	358	4377
June	13	3331	270	3614
July	10	3578	294	3882
August	12	4006	362	4380
September	16	4231	308	4555
October	11	4404	349	4764
November	11	3966	323	4300
December	15	3453	279	3747
Grand Total	149	48290	4009	52448

B. Number of customers who sought cold weather rule protection under Minnesota Statutes §216B.096 and §216B.097 and the number who were granted cold weather rule protection.

Table 25

Month	Customers who sought Cold Weather Rule Protection in 2024	Number Granted Cold Weather Protection in 2024
January	123	113
February	108	98
March	91	81
April	37	34
May	0	0
June	0	0
July	0	0
August	0	0
September	0	0
October	263	237
November	124	111
December	97	83
Grand Total	843	757

The deviation between customers who sought CWP, and the customers granted CWP is due to Otter Tail Power having to access the CWP form within our customer information system to begin our CWP discussion with the customer on the monthly amount of their CWP amount. Customers are not denied CWP but rather the customer chose an alternative payment option or obtained payment assistance.

C. Total number of customers whose service was disconnected involuntarily, and the number of these customers restored to service within 24 hours.

Table 26

Month	Customer Class	Disconnected For more than 24 hours	Service Restored within 24 hours	Grand Total
January	Residential	8	17	25
	Small Commercial	0	3	3
January Total		8	20	28
February	Residential	21	19	40
	Small Commercial	0	2	2
February Total		21	21	42
March	Residential	35	23	58
	Small Commercial	0	1	1
March Total		36	24	59
April	Residential	31	21	52
	Small Commercial	4	1	5
April Total		35	22	57
May	Residential	285	195	480
	Small Commercial	13	15	28
May Total		295	216	508
June	Residential	131	161	292
	Small Commercial	2	8	10
June Total		135	170	302
July	Residential	95	101	196
	Small Commercial	5	4	9
July Total		101	106	205
August	Residential	60	101	161
	Small Commercial	3	4	7
August Total		64	105	168
September	Residential	122	171	293
	Small Commercial	8	12	20
September Total		133	187	313
October	Residential	1	8	9
	Small Commercial	2	4	6
October Total		3	12	15
November	Residential	8	9	17
	Small Commercial	0	2	2
November Total		8	11	19
December	Residential	2	8	10
	Small Commercial	0	2	2
December Total		2	10	12
Grand Total		836	892	1728

D. Number of disconnected customers restored to service by entering into a payment plan.

Table 27

Month	Residential	Small Commercial	Grand Total
January	5		5
February	9	1	10
March	12		12
April	7		7
May	35		35
June	27		27
July	12		12
August	20		20
September	40		40
October	9		9
November	7		7
December	7		7
Grand Total	190	1	191

VIII. REPORTING SERVICE EXTENSION REQUEST RESPONSE TIMES 7826.1600

Minnesota Rule 7826.1600, Reporting Service Extension Request Response Times, requires utilities to provide a report on service extension request response times.

In compliance with this rule, Otter Tail Power provides in **the figures and tables** below our report of service extension request response times by customer class for each calendar month, in the following categories:

- A. The number of customers requesting service to a location not previously served by Otter Tail Power and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service.**

Figures and tables on next page.

Residential – Not Previously Served

Figure 10

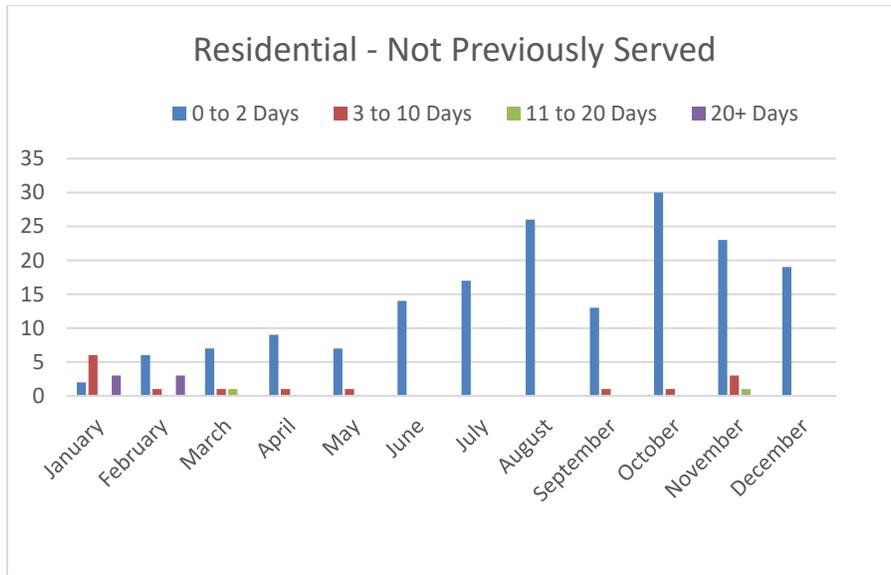


Table 28

Month	0 to 2 Days	3 to 10 Days	11 to 20 Days	20+ Days	Grand Total
January	2	6		3	11
February	6	1		3	10
March	7	1	1		9
April	9	1			10
May	7	1			8
June	14				14
July	17				17
August	26				26
September	13	1			14
October	30	1			31
November	23	3	1		27
December	19				19
Grand Total	173	15	2	6	196

Small Commercial – Not Previously Served

Figure 11

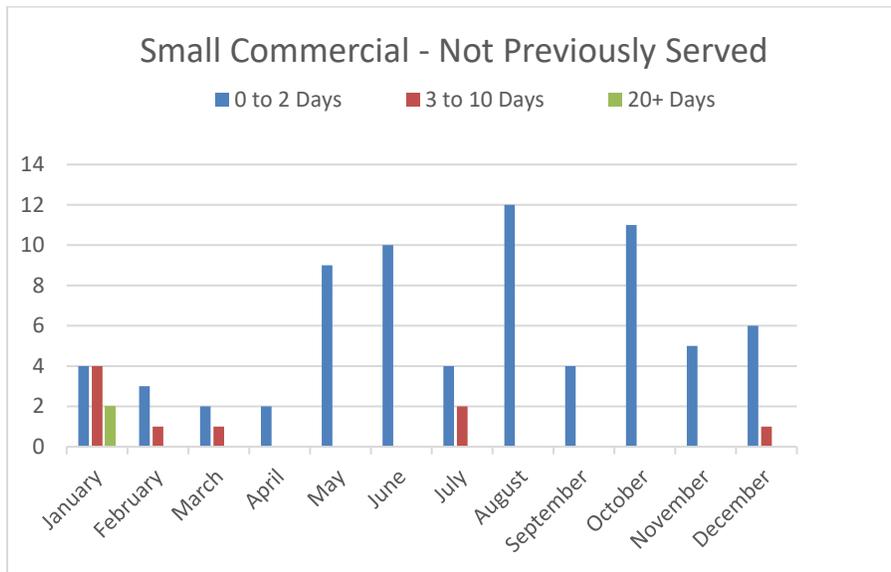


Table 29

Month	0 to 2 Days	3 to 10 Days	20+ Days	Grand Total
January	4	4	2	10
February	3	1	0	4
March	2	1	0	3
April	2	0	0	2
May	9	0	0	9
June	10	0	0	10
July	4	2	0	6
August	12	0	0	12
September	4	0	0	4
October	11	0	0	11
November	5	0	0	5
December	6	1	0	7
Grand Total	72	9	2	83

Large Commercial – Not Previously Served

Figure 12

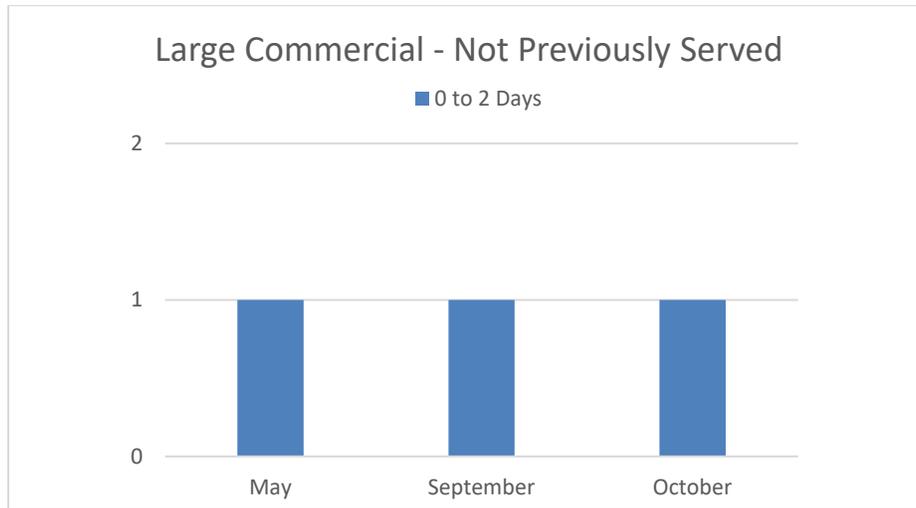


Table 30

Month	0 to 2 Days	Grand Total
May	1	1
September	1	1
October	1	1
Grand Total	3	3

Government – Not Previously Served

Figure 13

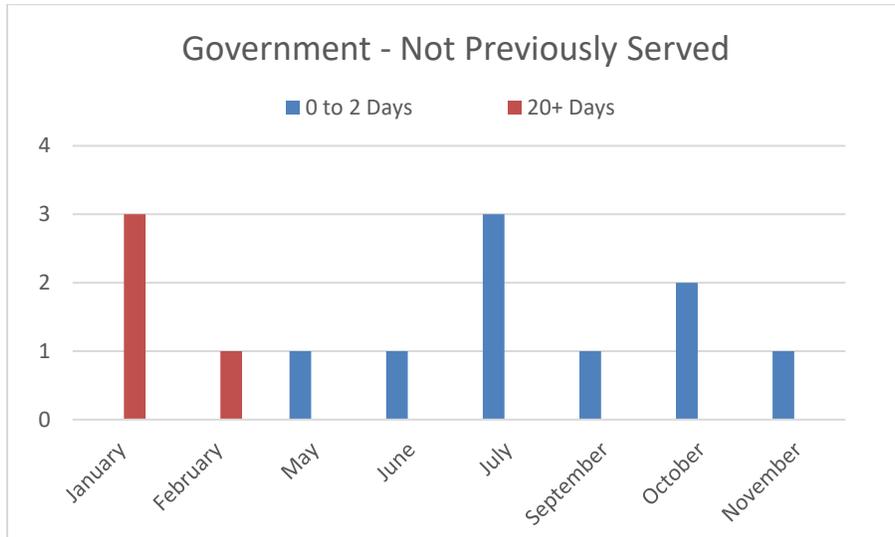


Table 31

Month	0 to 2 Days	20+ Days	Grand Total
January		3	3
February		1	1
May	1		1
June	1		1
July	3		3
September	1		1
October	2		2
November	1		1
Grand Total	9	4	13

B. The number of customers requesting service to a location previously served by the utility but not served at the time of the request, and the intervals between the date service was installed and the later of the in-service date requested by the customer or the date the premises were ready for service, shown in the figures and tables below.

Residential – Previously Served

Figure 14

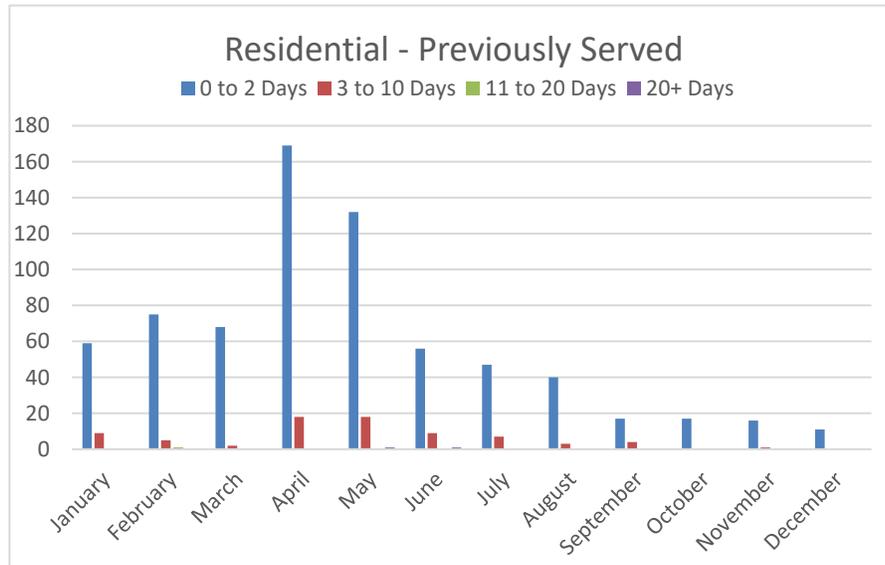


Table 32

Month	0 to 2 Days	3 to 10 Days	11 to 20 Days	20+ Days	Grand Total
January	59	9			68
February	75	5	1		81
March	68	2			70
April	169	18			187
May	132	18		1	151
June	56	9		1	66
July	47	7			54
August	40	3			43
September	17	4			21
October	17				17
November	16	1			17
December	11				11
Grand Total	707	76	1	2	786

Small Commercial – Previously Served

Figure 15

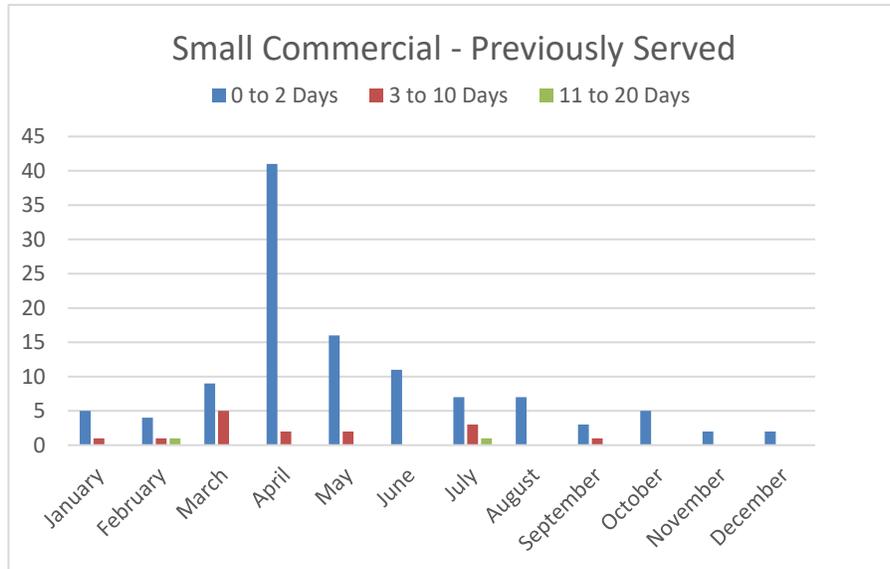


Table 33

Month	0 to 2 Days	3 to 10 Days	11 to 20 Days	Grand Total
January	5	1		6
February	4	1	1	6
March	9	5		14
April	41	2		43
May	16	2		18
June	11			11
July	7	3	1	11
August	7			7
September	3	1		4
October	5			5
November	2			2
December	2			2
Grand Total	112	15	2	129

Large Commercial – Previously Served

Figure 16

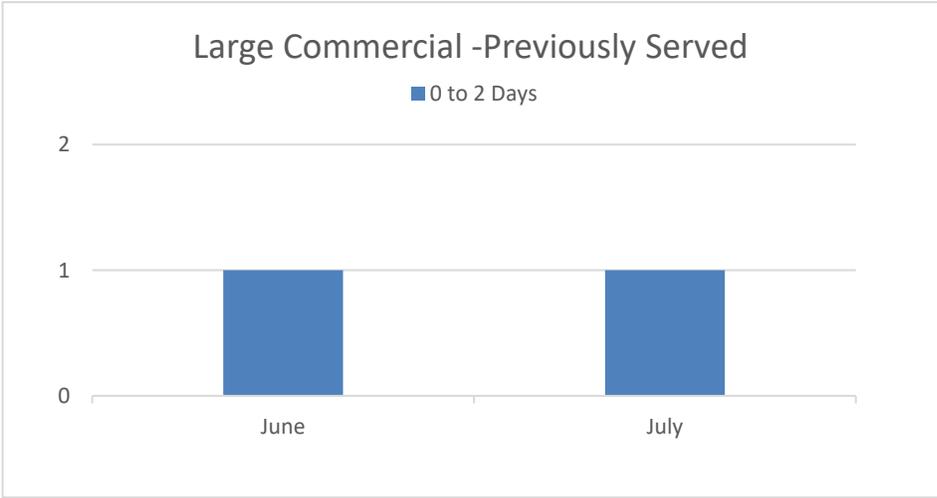


Table 34

Month	0 to 2 Days	Grand Total
May	1	1
September	1	1
October	1	1
Grand Total	3	3

Government – Previously Served

Figure 17

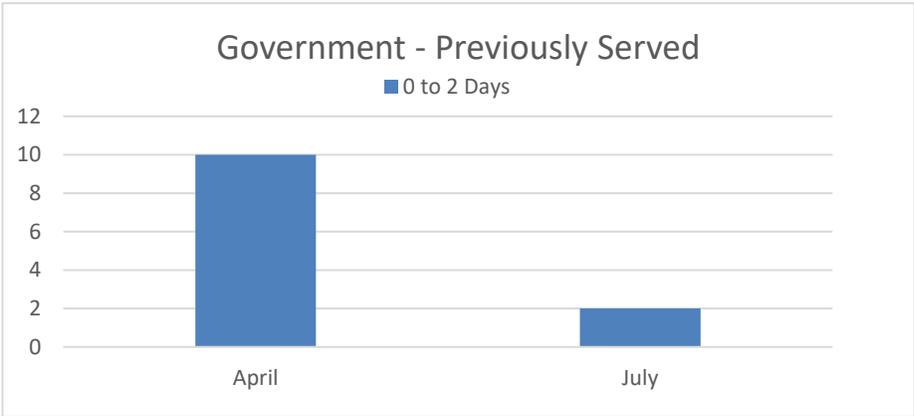


Table 35

Month	0 to 2 Days	Grand Total
April	10	10
July	2	2
Grand Total	12	12

IX. REPORTING CALL CENTER RESPONSE TIMES 7826.1700

Minnesota Rule 7826.1700, Reporting Call Center Response Times, requires utilities to provide a detailed report on call center response times, including calls to the business office and calls regarding service interruptions. The report must include a month-by-month breakdown of information.

In compliance with this rule, Otter Tail Power provides its report of call center response times for 2024 in **Table 36**. **Figure 18** shows a historical graph of the percent of Minnesota calls answered within 20 seconds.

Table 36

	(A)	(B)	(C)	(D)	(E)
Month	Offered	Calls Abandoned	Calls Answered after 20 Seconds	Answered within 20 Seconds	Percent Answered within 20 seconds¹
January	3,930	16	279	3,635	92.49%
February	3,589	6	223	3,360	93.62%
March	3,437	9	202	3,226	93.86%
April	4,180	75	808	3,297	78.88%
May	4,760	103	1,160	3,497	73.47%
June	4,250	119	1,360	2,771	65.20%
July	4,570	168	1,537	2,865	62.69%
August	4,437	53	883	3,501	78.90%
September	4,364	122	1,442	2,800	64.16%
October	4,289	106	1,220	2,963	69.08%
November	3,300	18	283	2,999	90.88%
December	3,016	27	289	2,700	89.52%
Total	48,122	822	9,686	37,614	78.16%

¹Column (D) / Column (A) = Percent answered within 20 Seconds

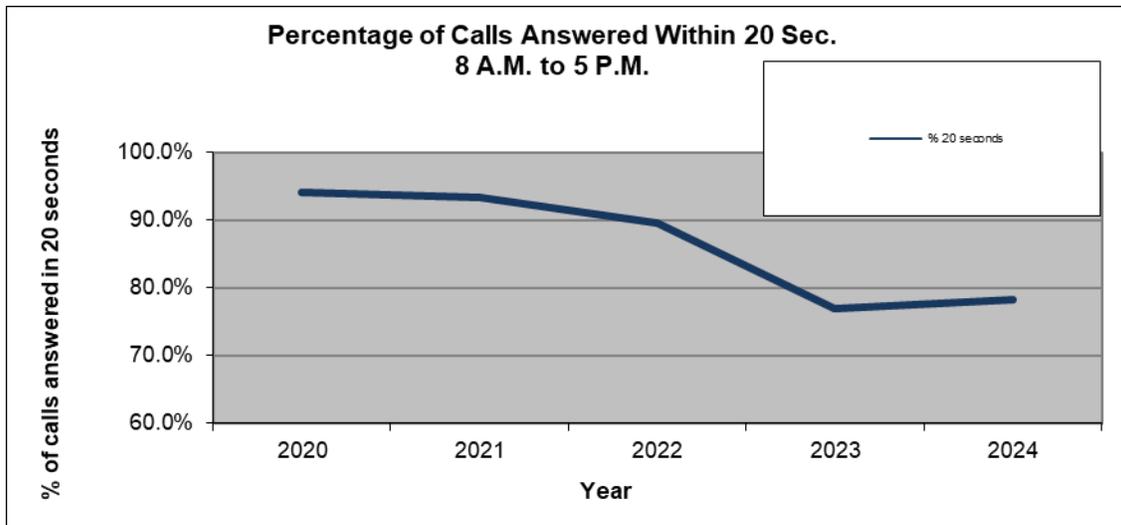
Otter Tail Power operates a call center using agents located in five office locations across our entire service territory. Agents in these office locations answer calls from our Minnesota, North Dakota, and South Dakota customers. With our telecommunications system, our auto attendant allows customers to select the state in which the account or service the customer is calling to inquire about. This auto attendant for selecting the state is for reporting purposes only.

In 2024, Otter Tail Power did not meet the required 80 percent of calls answered within 20 seconds. We experienced nine CSR new openings throughout the year. We also experienced difficulties in hiring all of the open positions. We attempted to change the hiring locations if we were unsuccessful, analyzed our interviewing strategy, and worked to create tiers within the CSR role to make the role more attractive.

We did monitor our 80/20 requirement and attempted to broaden our employee groups to assist in answering customer calls. To ensure availability for our customers and to meet our 80/20 requirement, our training team, Customer Service Managers, and administrative staff assisted with answering calls at various times throughout the year.

Within the last quarter of 2024, we have hired six new CSRs and are currently completing our training program. We are actively working to hire our remaining open positions and plan to have those filled in quarter one of 2025. As CSRs complete their training and begin answering calls, we will return to more historic call center response levels.

Figure 18



X. REPORTING EMERGENCY MEDICAL ACCOUNT STATUS 7826.1800

Minnesota Rule 7826.1800, Reporting Emergency Medical Account Status, requires utilities to provide a report that includes the number of customers who requested emergency medical account status under Minnesota Statutes, Section 216B.098 Subdivision 5, the number whose applications were granted, and the number whose applications were denied and the reason for each denial.

In compliance with this rule, Otter Tail Power reports that during 2024 Otter Tail Power had twelve Minnesota customers request emergency medical account status. Otter Tail Power granted this status to all twelve customers. This is an increase of two for the number of customers that requested and were granted emergency medical account status in 2023.

As part of our Emergency Medical Account visibility plan, annually, in August Otter Tail Power includes a bill insert with Customer's Residential Bills informing them of medically necessary equipment protection that is available. This protection is included in our Customer Information brochure that is in our New Customer Packets and on our website. Our Customer Service Representatives continue to educate and promote this protection with our customers.

Medically necessary equipment protection

If you're a residential customer with an existing medical condition that involves medical equipment requiring electricity, you may qualify for protection from disconnection.

To qualify, you must provide written certification from a licensed medical professional stating that lack of service will impair or threaten your health or safety.

If you qualify for medically necessary equipment protection and uphold an established payment arrangement, we won't disconnect your electrical service.

For more information,
contact us at **800-257-4044**
or visit **otpco.com**.



MN 8/24

XI. REPORTING CUSTOMER DEPOSITS 7826.1900

Minnesota Rule 7826.1900, Reporting Customer Deposits, requires utilities to provide a report on the number of customers who were required to make a deposit as a condition of receiving service.

In compliance with this rule, Otter Tail Power reports that zero customers were required to make a deposit as a condition of receiving service during 2024. The number of deposit requests did not change when compared to 2023. During the pandemic deposits were not collected, as a part of the voluntary suspension of disconnections as we navigated out of the pandemic, Otter Tail Power assessed the need to require deposits. Otter Tail Power did make the decision to stop collecting deposits. We continue to assess the need for deposits and if necessary, we would reinstate the process to collect deposits.

XII. REPORTING CUSTOMER COMPLAINTS 7826.2000 AND 7820.0500

Minnesota Rule 7826.2000, Reporting Customer Complaints, requires utilities to provide a detailed report on complaints by customer class and calendar month.

In compliance with this rule, Otter Tail Power provides the following information on complaints the Company received during 2024.

A & B. The number and percentage of complaints alleging billing errors, inaccurate metering, wrongful disconnection, high bills, inadequate service, and the number involving service extension intervals, service restoration intervals, and any other identifiable subject matter involved in five percent or more of the customer complaints.

Table 37

2024		
Complaint Type	Total	Percent of Total
AMI Installations	2	1.77%
Billing error	11	9.73%
High bills	20	17.70%
Inaccurate metering	1	0.88%
Inadequate service - field/operations	37	32.74%
Inadequate service - programs and services	17	15.04%
Inadequate service - customer service	16	14.16%
Inadequate service - Cold Weather Protection	0	0.00%
Wrongful disconnect	8	7.08%
Service extension intervals	0	0.00%
Service restoration intervals	1	0.88%
Grand Total	113	100.00%

C. The number and percentage of complaints resolved upon initial inquiry, within ten days, and longer than ten days.

Table 38

2024		
Resolved by	Total	Percentage
(1) Resolved on Initial Inquiry	105	93%
(2) Resolved within 10 days	3	3%
(3) Resolved in greater than 10 days	5	4%
Grand Total	113	100%

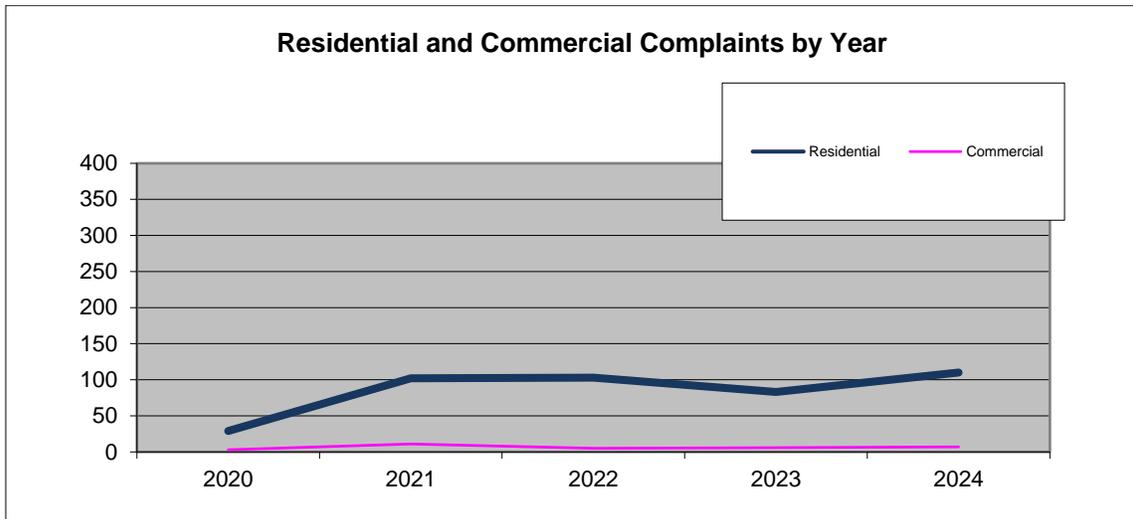
D. The number and percentage of all complaints resolved by taking any of the following actions: (1) taking the action the customer requested; (2) taking an action the customer and the utility agree is an acceptable compromise, (3) providing the customer with information that demonstrates that the situation complained of is not reasonably within the control of the utility or (4) refusing to take the action the customer requested.

Table 39

2024		
Action Taken	Total	Percentage
(1) Took action the Customer requested	31	27.43%
(2) Took an action the customer and the utility agree is an acceptable compromise	39	34.51%
(3) Provided the customer with information that demonstrates that the situation complained of is not reasonably within the control of Otter Tail Power	37	32.74%
(4) Refused to take action the customer requested	6	5.31%
Grand Total	113	100.00%

Figure 19 is a graph showing complaints by residential customer class and commercial customer class for the previous five years.

Figure 19



E. The number of complaints forwarded to the utility by the Commission’s Consumer Affairs Office for further investigation and action.

Otter Tail Power received eleven customer complaints in 2024 that were forwarded from the Commission’s Consumer Affairs Office as shown in Table 40. All eleven complaints have been resolved. The number of complaints received in 2023 was five and the one unresolved complaint from last year’s report has been resolved.

Table 40

	2021	2022	2023	2024
Customer Complaints	7	7	5	11

Minnesota Rule 7820.0500 Reporting Requirement requires each utility to provide an annual report with the Public Utilities Commission.

The Minnesota Public Utilities Commission made the following disposition in a January 18, 2022 Order in Docket No. E017/M-22-159.

Ordering Paragraph 1: Eliminated the standalone Annual Summary of Customer Complaint docket (YY-13).

Ordering Paragraph 2: Required utilities to include customer complaint data from Minnesota Rules 7820.0500 in their Annual Service Quality reports with data filed as part of Minnesota Rules 7826.2000.

In compliance with this Order and Minnesota Rules 7820.0500, Otter Tail Power provides the following annual report information in Attachment 3 to this report.

- A. The total numbers of resolved and unresolved complaints by class of service and type of complaint.**
- B. The total number of customers in each class of service and the total number of customers who initiated service during the past year.**
- C. The names, addresses, and telephone numbers of personnel designated and authorized to receive and respond to the requests and directives of the public utilities commission regarding customer inquiries, service requests, and complaints. The utility shall keep this information current and if changes occur, the utility must inform the commission immediately of these changes.**

For the purposes of this Annual Summary of Customer Complaints, Otter Tail Power has defined a customer complaint as a written complaint received from any of the following: Minnesota Public Utilities Commission, Minnesota Department of Commerce (Division of Energy Resources), Office of Minnesota Attorney General, and Better Business Bureau, or a Company officer. Using this definition, Otter Tail Power received fifteen reportable complaints during 2024. All fifteen of these complaints have been resolved.

Reporting Major Service Interruptions Summary - 2024

Minnesota Rule 7826.0500, Subpart 1g, required utilities to file a copy of each report filed under part 7826.0700, reporting major service interruptions. Per PUC order dated December 18, 2020 in E017/M-20-401 PUC granted a variance to MN Rule 7826.0500 Subpart 1.G. Require utilities to file a summary table that includes the information contained in the reports, similar to Attachment G. in Xcel's filing (E002/M-20-406).

	Feeder	Primary Event #	Begin Time	Completion Time	Duration HH/MM/SS	Customers Out	Region	Email sent to CAO
JANUARY = 0 total qualifying events, 0 events with no email								
FEBRUARY = 0 total qualifying event, 0 events with no email								
MARCH = 0 total qualifying event, 0 events with no email								
APRIL = 2 total qualifying events, 0 events with no email								
1	Pelican Rapids		4/16/2024 12:49	4/16/2024 15:20	2:31:14	510		x
2	McIntosh		4/17/2024 3:31	4/17/2024 4:57	1:25:48	526		x
MAY = 1 total qualifying event, 0 events with no email								
1	Brandon		5/22/2024 8:13	5/22/2024 9:13	1:00:00	208		x
	Brandon		5/22/2024 8:13	5/22/2024 9:13	1:00:10	377		x
JUNE = 3 total qualifying events, 0 events with no email								
1	Bemidji		6/15/2024 6:00	6/15/2024 7:19	1:19:35	3344		x
2	Crookston		6/18/2024 2:31	6/18/2024 4:33	2:01:34	522		x
3	Bemidji		6/28/2024 23:33	6/29/2024 1:01	1:28:14	75		x
	Bemidji		6/28/2024 23:33	6/29/2024 1:01	1:28:00	464		x
JULY = 3 total qualifying events, 0 events with no email								
1	Pelican Rapids		7/13/2024 21:12	7/14/2024 5:55	8:42:20	510		x
	Pelican Rapids		7/13/2024 21:14	7/14/2024 0:28	3:13:59	471		x
	Ottertail City		7/13/2024 21:51	7/14/2024 5:14	7:23:32	1372		x
	Fergus Falls		7/13/2024 21:39	7/14/2024 2:39	4:59:50	1173		x
2	Crookston		7/28/2024 7:38	7/28/2024 9:03	1:24:56	1347		x
	Crookston		7/28/2024 7:39	7/28/2024 9:03	1:24:44	5		x
	Crookston		7/28/2024 7:38	7/28/2024 8:45	1:06:45	283		x
	Crookston		7/28/2024 7:39	7/28/2024 8:45	1:06:34	933		x
3	Bemidji		7/31/2024 15:38	7/31/2024 17:41	2:03:02	769		x
	Bemidji		7/31/2024 15:40	7/31/2024 17:21	1:40:53	346		x
AUGUST = 3 total qualifying event, 0 events with no email								
1	Hallock		8/5/2024 17:30	8/5/2024 21:30	4:00:00	603		x
2	Twin Valley		8/8/2024 3:54	8/8/2024 5:26	1:32:42	721		x
3	McIntosh		8/29/2024 5:46	8/29/2024 7:35	1:49:16	526		x
SEPTEMBER = 2 total qualifying events, 0 events with no email								
1	Bemidji		9/13/2024 19:50	9/13/2024 20:58	1:08:41	3345		x
2	Morris		9/28/2024 18:04	9/28/2024 20:07	2:03:24	529		x
	Morris		9/28/2024 19:01	9/28/2024 20:07	1:05:24	944		x
OCTOBER = 0 total qualifying events, 0 events with no email								
NOVEMBER = 0 total qualifying event, 0 events with no email								
DECEMBER = 1 total qualifying events, 0 events with no email								
1	Fergus Falls		12/18/2024 17:46	12/18/2024 18:54	1:08:29	1648		x
	Fergus Falls		12/18/2024 17:45	12/18/2024 18:54	1:08:29	687		x

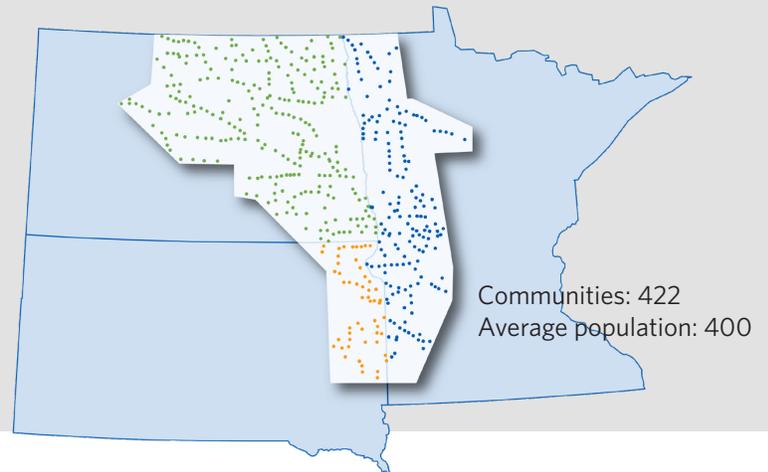
2024 MINNESOTA SAFETY, RELIABILITY, AND SERVICE QUALITY



Our focus on reliable electricity and timely, courteous customer service

OUR MISSION

To produce and deliver electricity as reliably, economically, and environmentally responsibly as possible to the balanced benefit of customers, shareholders, and employees and to improve the quality of life in the areas in which we do business.



POWER OUR CUSTOMERS CAN COUNT ON

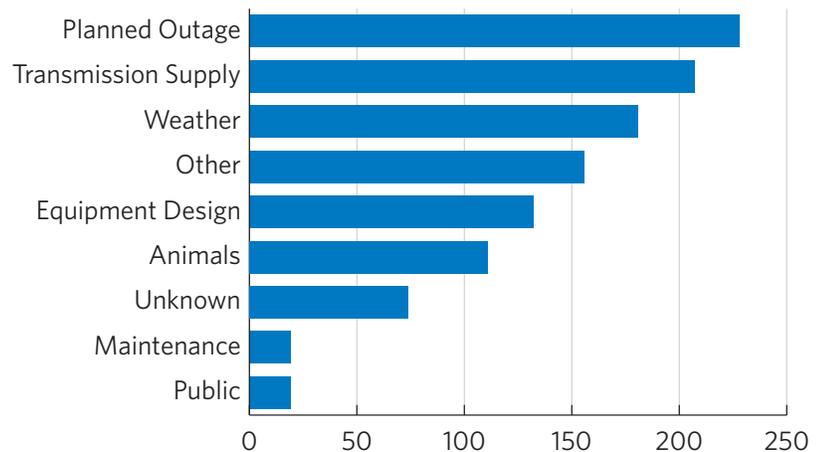
We strive to minimize the frequency and duration of service interruptions. And we deploy field personnel as safely and quickly as possible to restore power to customers when interruptions occur.

11.99% of our customers experienced an interruption greater than **six hours**.

6.08% of our customers experienced four or more interruptions lasting greater than **five minutes**.

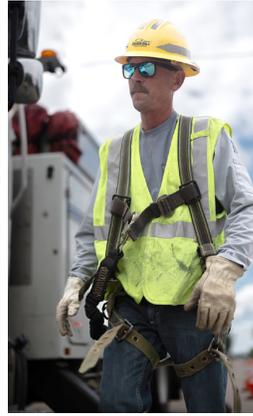


INTERRUPTION REPORT BY TYPE



Keeping our lines clear of trees and other vegetation helps ensure safe and reliable service. We trimmed vegetation along **500 miles** of electrical lines in 2024.





OUTAGE PREVENTION

As part of our long-term reliability strategy, we regularly perform critical analyses of our transmission and distribution systems.

We'll continue to invest in innovative, resourceful ways to create a more resilient regional transmission grid by:

- Identifying areas requiring proactive maintenance.
- Integrating geographic information system data.
- Continuous improvement efforts for the integrity of our existing infrastructure.

CUSTOMER SERVICE TEAM

We're here so our customers can focus on what matters most.

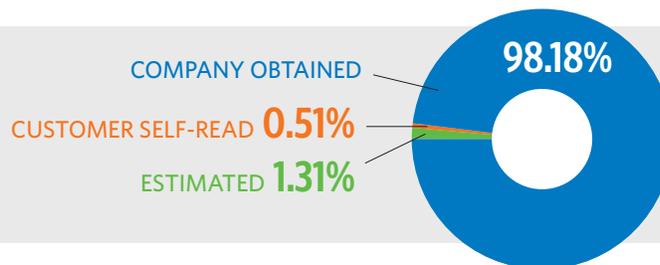
If there's a power outage, our customer service team is ready to help. **183 linemen and service representatives** were available to safely and quickly restore power to our customers in 2024.

Safety

In 2024 no injury-related incidents were reported that required medical attention as a result of downed wires or other electrical system failures.

Meter Reading

In 2024 in conjunction with our service representatives we phased in AMI metering allowing Otter Tail Power to electronically collect readings.



HIGH SERVICE STANDARDS

Our **26 customer service representatives** are ready to assist our customers.

We promoted several resources during **outbound calls** throughout our service area to customers in need, offering:

- Payment plans.
- Protection under the Minnesota Cold Weather Rule.
- Energy assistance options.

In 2024 our team received over **48,000 customer calls** during business hours. Of those, we answered **78%** within **20 seconds**.

These are just a few reasons customers call us:

- Start or stop service.
- Billing related matters.
- Report an outage.

**MOVING?
WE TURN ON
ELECTRICITY QUICKLY!**

90%
of locations we've
previously served
receive electricity
within **24** hours.

800-257-4044 or 218-739-8877
or visit otpc.com



- Facebook.com/OtterTailPowerCo
- Twitter.com/OtterTailPwrCo
- YouTube.com/OtterTailPowerCo
- LinkedIn.com/Company/Otter-Tail-Power-Company

MINNESOTA PUBLIC UTILITIES COMMISSION
 Consumer Affairs Office
 121 7th Place E - Suite 350
 St. Paul, MN 55101-2147

Docket No. E017/M-25-30
 Attachment 3
 Page 1 of 1

ANNUAL SUMMARY OF CUSTOMER COMPLAINTS

For Year Ending 12/31/2024
 in accordance with Minn. Rule 7820.0500

Name of Utility Otter Tail Power Company
 Address 215 S Cascade St., Fergus Falls, MN 56537
 Prepared by Wendi A. Olson Phone No. (218) 739-8699

NUMBER OF DISCONNECTS
 FOR NON-PAYMENT

(by month)

	1	2	3
Jan	25	3	0
Feb	40	2	0
Mar	58	1	0
Apr	52	5	0
May	480	28	0
Jun	292	10	0
Jul	196	9	0
Aug	161	7	0
Sep	293	20	0
Oct	9	6	0
Nov	17	2	0
Dec	10	2	0
Total	1,633	95	0

	<u>Residential</u>			<u>Commercial & Industrial</u>			<u>Interruptible</u>		
	Number Received	Number Resolved	Number Unresolved	Number Received	Number Resolved	Number Unresolved	Number Received	Number Resolved	Number Unresolved
I. Complaint Type									
A. Service	4	4							
B. Billing	11	11							
C. Rate									
D. Rules									
Total Complaints	15	15	0	0	0	0	0	0	0

	<u>Residential</u>	<u>Commercial & Industrial</u>	<u>Interruptible</u>
II. A. Number of Disconnections for Non-Payment	1,633	95	0
B. Number of Escrow Forms Filed	0	0	0
III. A. Total Number of Customers (year end)	51,154	11,253	0
B. Number of Customers Added During Year	147	14	0

- 1. Residential
- 2. Commercial & Industrial
- 3. Interruptible

7820.0500 REPORTING REQUIREMENT - Part C.

Company employee authorized to receive and respond to the requests –
 Matthew J. Olsen
 Manager, Regulatory Strategy & Compliance
 Otter Tail Power Company
 Phone: 218-739-8657
 Email: otpregulatory@otpc.com and molsen@otpc.com

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2024 Annual Safety, Reliability and Service Quality Report and Proposed SAIFI, SAIDI and CAIDI Reliability Standards for 2025
Docket No. E017/M-25-30**

I, Laura Dewey, 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
Annual Report**

Dated this 1st day of **April, 2025**.

/s/ LAURA DEWEY
Laura Dewey
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8604

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
2	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
3	Sharon	Ferguson	sharon.ferguson@state.mn.us		Department of Commerce	85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
4	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
5	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
6	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
7	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
8	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
9	Kavita	Maini	kmainsi@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
10	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
11	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
12	Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN,	Electronic Service		No	Otter Tail Power Company 2025 SRSQ

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55101-2131 United States				
14	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
15	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ
16	Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company 2025 SRSQ