

July 1, 2024

**PUBLIC DOCUMENT**

Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> Place East, Suite 350  
St. Paul, Minnesota 55101

RE: **PUBLIC Comments of the Minnesota Department of Commerce**  
Docket No. E017/AA-24-65

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01.

The Petition was filed on May 1, 2024, by Otter Tail Power Company.

The Department recommends the Minnesota Public Utilities Commission (Commission) **approve Otter Tail Power's 2025 forecasted Energy Adjustment Rider rates**. The Department is available to answer any questions the Commission may have.

Sincerely,

/s/ DR. SYDNIE LIEB  
Assistant Commissioner of Regulatory Analysis

SL/AU/ad  
Attachment

## Before the Minnesota Public Utilities Commission

---

### PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/AA-24-65

#### I. INTRODUCTION

On May 1, 2024, Otter Tail Power Company (Otter Tail or the Company) filed its 2025 Energy Adjustment Rider (EAR) forecast report (Petition) pursuant to the Minnesota Public Utilities Commission's (Commission's) June 12, 2019, Order in Docket No. E999/CI-03-802 and the applicable reporting requirements in the rules governing the automatic adjustment of charges, Minnesota Rules 7825.2800 to 7825.2840. Otter Tail requests the Commission accept the Company's filing as being in compliance with the applicable reporting requirements and approve the Company's proposed 2025 system energy cost forecast along with the corresponding forecasted EAR rates for each customer class.

#### II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce Division of Energy Resources (Department) reviewed Otter Tail's Petition to determine (1) whether the Company's forecasted 2025 net system energy cost of \$0.023920 per kWh<sup>1</sup> (\$23.92/MWh) and the corresponding monthly EAR rates are reasonable; and (2) whether the Petition included the applicable reporting requirements. Because Otter Tail's EAR and Fuel Clause Adjustment (FCA) refer to the same cost recovery mechanism, we use them interchangeably throughout the instant comments.

##### A. *BACKGROUND SUMMARY ON OTTER TAIL'S FUEL CLAUSE ADJUSTMENT IN RECENT YEARS*

Minnesota Statutes § 216B.16, subd. 7, authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their FCA rates monthly to reflect, on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case; and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation (Docket No. E999/CI-03-802) to explore possible changes to the FCA and invited stakeholders to comment on the FCA's purpose, structure, rationale, and relevance. The Commission's December 19, 2017, Order in Docket No. E999/CI-03-802 approved certain reforms to the FCA mechanism. Specifically, Point 1 of the December 19, 2017, Order approved the Department's FCA reform proposals as follows:

- a. The Commission will set recovery of the utility's fuel, power purchase agreements, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.

---

<sup>1</sup> Petition, page 1.

- b. Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- c. The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- d. Utilities will be allowed to track any changes in \$/MWh fuel costs that occur over the year and there will be no carrying charge on the tracker.
- e. Annually, each electric utility will report actual \$/MWh fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year.
- f. Each electric utility will refund any over-collections and show prudence of costs before allowing recovery of under-collections. If annual revenues collected (\$/MWh) are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs, the utility must show why it is reasonable to charge the higher costs (under-collections) to ratepayers through a true-up mechanism.

In addition, Point 2 of the Commission's December 19, 2017, Order in Docket No. E999/CI-03-802 requires the following:

Each utility must file proposed fuel rates outside of a general rate case. If the proposed fuel rates are different from the rates set in a utility's most recent miscellaneous rate docket that coincides with a rate case, the utility must fully explain the basis for any difference. These filings should include complete documentation supporting the proposed fuel rates, including each PPA, estimates of costs for each type of fuel, and the proportion of each type of fuel, along with a complete description of any model used to develop the proposed \$/MWh fuel rates, including but not limited to the identification and justification of the inputs and formulas used for all fuel types, and fully documented sales forecasts.

The Commission's December 12, 2018, Order in Docket No. E999/CI-03-802 modified certain aspects of and added to the FCA reform previously approved in the Commission's December 19, 2017, Order in the same docket. In particular, the December 12, 2018, Order:

- Established a January 1, 2020, implementation date for the FCA reform.
- Required the utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.

- Granted the relevant utilities a variance to Minnesota Rule 7825.2600, Subp. 3, which requires that the FCA be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base fuel rates annually.

The Commission's June 12, 2019, Order in Docket No. E999/CI-03-802 provided additional details to finalize the FCA reform. Specifically, the June 12, 2019, Order approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these rules.
- A procedural schedule, as shown in Appendix A of the Order.
- A threshold of plus or minus 5% of all FCA costs and revenues to determine whether an event qualifies as a significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.
- Tracking under- or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.
- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019, joint comments<sup>2</sup> in Docket No. E999/CI-03-802.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019, joint comments<sup>3</sup> in Docket No. E999/CI-03-802.
- Discontinuation of Otter Tail's reporting of Part D, Section 5 (MISO Day 1); Part E, Section 10, Attachment G (UCAP); Part H, Section 6, Attachments N and O (generation deliverability and IRP-related); and Part H, Section 8 (transformers).

On May 1, 2019, in Docket No. E017/AA-19-297, Otter Tail filed its initial petition requesting approval of its 2020 FCA/EAR forecast. Subsequently, in reply comments filed July 31, 2019, in the same docket, Otter Tail revised its forecasted 2020 system fuel/purchased power costs to \$129,421,381, an estimate which reduced the forecasted average fuel/purchased power cost per MWh from \$25.777<sup>4</sup> to \$25.719<sup>5</sup> for 2020. The Commission approved Otter Tail's 2020 forecast, as revised in the Company's July 31, 2019, reply comments, in its December 18, 2019, Order in Docket No. E017/AA-19-297.<sup>6</sup>

Pursuant to the Commission's June 12, 2019, Order in Docket No. E999/CI-03-802, on January 30, 2020, Otter Tail filed a compliance report in Docket No. E017/M-03-30 with the required July 1, 2018 - December 31, 2019, FCA/EAR true-up. In its May 22, 2020, Order in Docket No. E017/M-03-30, the

---

<sup>2</sup> In the March 1, 2019, joint comments, Attachment 2 corresponds to Otter Tail Power.

<sup>3</sup> In the March 1, 2019, joint comments, Attachment 5 corresponds to Otter Tail Power.

<sup>4</sup> See Table 2 of Otter Tail's initial May 1, 2019, filing in Docket No. E017/AA-19-297.

<sup>5</sup> See Table 1 of Otter Tail's July 31, 2019, filing in Docket No. E017/AA-19-297.

<sup>6</sup> Otter Tail's Commission-approved 2020 forecasted FCA costs and corresponding monthly EAR rates are identified in Revised Attachment 2 and Revised Attachment 1 of the Company's July 31, 2019, reply comments in Docket No. E017/AA-19-297.

Commission approved the Company's compliance report and annual true-up credit of \$0.0005 per kWh, which Otter Tail applied to the monthly rates it charged to customers for sales subject to FCA/EAR during the period of March 1, 2020 - February 28, 2021.

On May 14, 2020, in Docket No. E017/AA-19-297, Otter Tail submitted a filing requesting approval to reduce its fuel cost charges to customers for the period of July – September 2020. In its July 13, 2020, Order in the same docket, the Commission approved the Company's proposed \$3,676,903 refund to customers, thereby reducing Otter Tail's July – September 2020 EAR rates by \$0.0057 per kWh. On October 12, 2020, in Docket No. E017/AA-19-297, Otter Tail requested approval to refund an additional \$8,383,674<sup>7</sup> to account for the Company's FCA/EAR over-collections between April and September 2020. The Commission's November 16, 2020, Order approved the \$8,383,674 refund, reducing the Company's January to June 2021 EAR/FCA rates by \$0.0061 per kWh.

On May 1, 2020, in Docket No. E017/AA-20-462, Otter Tail filed its initial petition requesting approval of its 2021 FCA/EAR forecast. On August 14, 2020, Otter Tail filed reply comments revising the Company's forecasted 2021 system fuel/purchased power costs to \$102,058,949, an estimate which reduced the forecasted average fuel/purchased power cost per MWh from \$20.998 to \$20.891 for 2021.<sup>8</sup> The Commission approved Otter Tail's 2021 forecast, as revised in the Company's August 14, 2020 reply comments, in its December 31, 2020 Order in Docket No. E017/AA-20-462.<sup>9</sup>

On February 26, 2021, Otter Tail filed its 2020 FCA/EAR true-up in Docket No. E017/AA-19-297. The Company's 2020 true-up filing requested Commission approval to refund customers \$1,246,144 in overcollections. On June 30, 2021, the Commission issued an order accepting and approving the Company's 2020 true-up, with modifications.

On May 3, 2021, in Docket No. E017/AA-21-311, Otter Tail filed its initial petition requesting approval of its 2022 FCA/EAR forecast. The Company's forecasted 2022 system fuel/purchased power costs were \$104,111,271, an estimate which reduced the forecasted average fuel/purchased power cost per MWh to \$20.783 for 2022. The Commission approved Otter Tail's 2022 forecast in its December 2, 2021, Order in Docket No. E017/AA-21-311.

On March 1, 2022, Otter Tail filed its 2021 FCA/EAR true-up in Docket No. E017/AA-20-462. The Company's 2021 true-up filing requested Commission approval to collect \$700,126 in under collections over a four-month period. The Department made a recommendation to the Commission for approval, and on July 5, 2022, the Commission issued an order accepting and approving Otter Tail's energy adjustment rider true-up compliance filing as requested.

---

<sup>7</sup> Attachment 1 of Otter Tail's October 12, 2020, filing in Docket No. E017/AA-19-297.

<sup>8</sup> See Table 1 of Otter Tail's August 14, 2020, filing in Docket No. E017/AA-20-462.

<sup>9</sup> Otter Tail's Commission-approved 2021 forecasted FCA costs and corresponding monthly EAR rates are identified in Revised Attachment 2 and Revised Attachment 1 of the Company's August 14, 2014, reply comments in Docket No. E017/AA-20-462.

On May 2, 2022, in Docket No. E017/AA-22-214, Otter Tail filed its initial petition requesting approval of its 2023 FCA/EAR forecast. On June 30, 2022, the Department filed comments recommending approval of the Company's forecasted rates and requesting additional information regarding planning resource auction (PRA) revenues in reply comments. On December 29, 2022, the Commission issued an order requiring Otter Tail to reduce its 2023 FCA forecast fuel costs by \$3.89 million to reflect credits for PRA revenues, to \$146,968,503 for a MWH cost of \$26.188.

On February 28, 2023, Otter Tail filed its 2022 FCA/EAR true-up in Docket No. E017/AA-21-311. The Company's 2022 true-up filing requested Commission approval to recover \$9,411,883 in under collections. The Department made a recommendation to the Commission for approval, and on June 30, 2023, the Commission issued an order accepting and approving Otter Tail's energy adjustment rider true-up compliance filing as requested.

On May 1, 2023, in Docket No. E017/AA-23-181, Otter Tail filed its initial petition requesting approval of its 2024 FCA/EAR forecast. The Company's forecasted 2024 system fuel/purchased power costs were \$150,076,693, an estimate which reduced the forecasted average fuel/purchased power cost per MWh to \$26.099 for 2024. The Commission approved Otter Tail's 2024 forecast in its November 9, 2023, Order in Docket No. E017/AA-23-181.

On March 1, 2024, Otter Tail filed its 2023 FCA/EAR true-up in Docket No. E017/AA-22-214. The Company's 2023 true-up filing requested Commission approval to refund \$5,201,983 in over collections. On April 15, 2024, the Department filed comments recommending approval of Otter Tail's FCA/EAR true-up. The petition was approved by the Commission at its June 27, 2024 agenda meeting.

On May 30, 2024, Otter Tail filed a Supplemental Filing in Docket No. E017/AA-23-181 requesting to refund customers \$12 million due to over-collections from January 2024 to April 2024. Ordering Point 3 of the Commission's June 12, 2019, Order in Docket No. E999/CI-03-802 allows an adjustment to approved fuel rates subject to a threshold of plus or minus 5 percent of all FCA costs and revenues. Revised rates may be implemented following a 30-day notice period if no party objects to the revised rates. Due to no objections from related parties, an EAR rate reduction of \$0.009120 per kWh will be implemented from July 2024 to December 2024.

The instant Petition provides the forecasted energy costs and the associated proposed rates recoverable through the EAR for 2025, as required under the modified FCA process currently in place.

#### **B. ANNUAL COMPLIANCE AND REPORTING REQUIREMENTS**

In Point 7 of its June 12, 2019, Order in Docket No. E999/CI-03-802, the Commission approved the annual FCA forecast and true-up reporting compliance matrix specific to Otter Tail, as shown in Attachment 2 of the March 1, 2019, joint comments in the same docket. The Department verified the Company provided the required information, as summarized in the following table:

**Table 1: Compliance Reporting for Otter Tail’s Fuel Clause Adjustment Forecast**

<i>Reporting Requirement</i>	<i>Petition Reference Where Otter Tail Provided the Required Information</i>
<b>Compliance Matrix in Attachment 2 of the March 1, 2019 joint comments in Docket No. E999/CI-03-802<sup>10</sup></b>	
Lines 1-4, Policies and Actions (Minnesota Rule 7825.2800)	DOC IR 1, Attachment 1, Appendix A, Section 1.1-1.3
Line 9, Base Cost of Fuel	DOC IR 1, Attachment 1, Appendix A, Section 2
Line 15, Total Cost of Fuel Delivered to Customers	DOC IR 1, Attachment 1, Appendix A, Section 2.1
Line 26, Passing MISO Day 2 Costs through the FCA	DOC IR 1, Attachment 1, Appendix A, Section 3
Line 29, MISO DAY 2 Charges	Petition Attachments 4.1 and 4.3
Line 32, SPP Energy Costs	DOC IR 1, Attachment 1, Appendix A, Section 4
Line 33, SPP Energy Costs	Petition Attachment 4.2
Line 37, Annual Five-Year Projection (Minnesota Rule 7825.2830)	Petition Attachment 12
Line 39, Annual Notice of Reports Availability (Minnesota Rule 7825.2840)	DOC IR 1, Attachment 2, Appendix B
Line 44, Use of Virtual Transactions for Retail	DOC IR 1, Attachment 1, Appendix A, Section 5
Line 56, Plant Outage Reporting	Petition, pages 12-14
Line 56, Lessons Learned	In DOC IR 1, Attachment 1, Appendix A, Section 6, the Company stated, “Otter Tail believes any discussion with regard to lessons learned and information sharing around plant outages is better suited for the true-up filing as opposed to this forecast filing.”
Line 56, Congestion and Firm Transmission Rights	DOC IR 1, Attachment 1, Appendix A, Section 6, and Attachments 4.1 and 4.2

**Table 1 Continued: Compliance Reporting for Otter Tail’s Fuel Clause Adjustment Forecast**

<b>December 18, 2019, Order in Docket No. E017/AA-19-297</b>	
Otter Tail shall identify any and all variables for which Otter Tail’s Strategist run outcome would be inconsistent with the historical data of the variable and describe and justify any and all steps used to address the inconsistency issue(s).	Petition, page 26
Otter Tail shall provide as public data the historical system sales and their breakdown by customer class, except for classes for which private customer usage could be derived	Petition, page 27, and Petition Attachment 6
Otter Tail shall provide as public data the total historical net system FCA costs, including their breakdown by major components.	Petition, page 27, and Petition Attachments 2-3

<sup>10</sup> The line numbers in Table 1 refer to the line numbers in the Commission-approved matrix of reporting requirements for Otter Tail’s FCA forecast report.

<p>Otter Tail shall update its 2010 internal line losses study and incorporate that information into the 2021 Forecast.</p>	<p>On Petition page 27 Otter Tail stated “This compliance obligation was satisfied in the 2021 MN FCA Forecast Filing, which was approved by the December 2020 Order. Otter Tail updated its line losses study and incorporated the results into the 2021 MN FCA Forecast. The updated parameters have been included in subsequent FCA Forecasts.”</p>
---	--

**Table 1 Continued: Compliance Reporting for Otter Tail’s Fuel Clause Adjustment Forecast**

<b>March 12, 2024, Order in Docket No. E999/CI-03-802</b>	
<p>In their future Fuel Clause Adjustment filings, the utility shall incorporate-</p> <ul style="list-style-type: none"> <li>a. Answers to recurring information requests, including the most recent three-year average of actual annual data compared to the forecast for the FCA calculation components, generation costs, purchase costs, inter-system sales and outages; and</li> <li>b. A comparison of the actual winter energy purchase amounts to the forecast amounts, with an explanation of a variance of five percent or greater.</li> </ul>	<p>Petition, pages 28-29</p>

Based on our review, the Department recommends the Commission accept Otter Tail’s Petition as complying with the FCA forecast reporting requirements.

*C. OTTER TAIL’S PROPOSED CALCULATION OF THE 2025 ENERGY ADJUSTMENT CHARGES*

The following list describes certain terms relevant to Otter Tail’s current proposals:

- Energy Adjustment Rider (EAR): The tariff governing the rates for changes in fuel costs charged to Otter Tail’s ratepayers; the EAR calculates the overall change in fuel costs from the amounts set in base rates.
- Energy Adjustment Factor Ratio (EAF Ratio): Estimate of each customer class’s characteristic use of energy and resulting contribution to Otter Tail’s overall energy costs.
- Energy Adjustment Factor (EAF): The fuel rate Otter Tail charges, per kWh, to ratepayers, based on the EAR and EAF Ratio.
- Energy Adjustment Charge (EAC): The total fuel adjustment charge (EAF times each customer’s kWh use).

The Company’s calculation of its proposed 2025 forecasted EAR rates, as shown in Petition Attachments 1 and 2 and described in the EAR Rate Schedule, can be summarized as follows:

- First, Otter Tail estimates an overall EAR rate for its system for each month. This estimated rate is equal to the difference between the monthly forecasted cost of energy rate, plus the monthly true-up factor, and the cost of fuel collected in base rates.
- Second, for each customer class, Otter Tail establishes an EAF ratio. The EAF ratio is based on how each class’s characteristic use of energy (load factor) affects the



Company's overall energy costs (measured by each customer class's share of the energy use in each hour of the year, via the E8760 cost allocator established in Otter Tail's most recently approved rate case).

- Third, Otter Tail estimates the monthly EAF for each customer class by multiplying the applicable EAF ratio<sup>11</sup> by the monthly overall EAR rate (the \$/kWh amount the base cost of energy is above or below the forecasted monthly \$/kWh net system FCA costs).
- Fourth and finally, Otter Tail calculates the monthly EAC as the monthly EAF (for the applicable customer class) multiplied by the customer's applicable monthly billing kWh.

The Department concludes Otter Tail's calculation of its proposed 2025 EAR rates for each customer class is consistent with the Commission-approved EAR tariff.

*D. OVERVIEW OF OTTER TAIL'S FORECAST PROCESS*

It is the Company's responsibility to properly identify and forecast all charges it intends to recover through the FCA. Absent this responsibility, utilities would have little incentive to accurately forecast all FCA costs they intend to recover, which could limit the benefits of the forecast and true-up processes. Poorly supported FCA forecast and/or true-up filings will likely lead to delays in the regulatory process.

The following table summarizes the Company's 2025 system-level forecast components, including the MWh system sales subject to the EAR and net system costs recoverable through the EAR.

**Table 2: Otter Tail's 2025 Forecasted System Sales and Costs<sup>12</sup>**

<i>Forecasted System Sales Subject to FCA/EAR (A)</i>	<i>Forecasted Net System Costs (B)</i>	<i>Net System Average Cost \$ per MWh (B/A)</i>
5,885,378 MWh	\$140,775,339	\$23.92/MWh

The following table shows Otter Tail's \$/MWh forecast of its 2025 net system FCA/EAR cost is about average when looking from 2011 to present day.

---

<sup>11</sup> The applicable Commission-approved EAF ratio for each class is identified on page 3 of the EAR Rate Schedule, Section 13.01 (Petition Attachment 9).

<sup>12</sup> Data retrieved from Petition Table 2.

**Table 3: Otter Tail’s Historical and Forecasted Net System Fuel Clause Adjustment Costs (\$/MWh)<sup>13</sup>**

<i>Calendar Year</i>	<i>Net System Cost (\$/MWh)</i>
2011	22.43
2012	23.11
2013	23.48
2014	25.15
2015	24.73
2016	23.06
2017	23.78
2018	24.14
2019	23.93
2020	25.72
2021	21.68
2022	25.89
2023	20.75
2024 Forecasted	26.099
2025 Forecasted	23.92

*1. Otter Tail’s 2025 Forecast of System Sales (MWh)*

Petition Attachment 6 provides a breakdown by month, state, and customer class of the 2025 forecasted 5,885,378 MWh in system sales subject to the FCA/EAR. Otter Tail provided a sales forecast description explaining the modeling and inputs the Company used to develop the 2025 sales forecast.<sup>14</sup>

The following Table 4 shows Otter Tail’s 2025 system sales forecast is similar to 2024 forecasted system sales and 2023 actual system sales, with a 1.1% and 2.4% increase over each, respectively. However, the 2025 forecast is about 20.7% higher than the average 2014 - 2022 historical data. As discussed on page 29 and Attachment 6.2 on page 13 of 29 of Otter Tail’s Petition in Docket No. E017/AA-22-214, the Company’s sales forecast increased due to a new Large Commercial class customer in its North Dakota service territory in 2022. Figure 11 in the Petition shows the significant increase in North Dakota Large Commercial/Pipeline sales with an expected increase of close to 900,000 MWh from 2021 actuals to 2025 forecasted sales.<sup>15</sup> However, the Department notes our recommendations in this docket should not be used in Otter Tail’s future rate cases or other proceedings, where a more thorough review of the sales forecast will occur.

<sup>13</sup> Department’s calculations based on data available in Otter Tail’s monthly and/or annual FCA filings since January 2011.

<sup>14</sup> Petition, Attachment 6.a.

<sup>15</sup> Petition, Attachment 6.2 page 13 of 29.

**Table 4: Otter Tail’s Historical and Forecasted System Sales Subject to the Fuel Clause<sup>16</sup>**

<i>Year</i>	<i>System Sales (MWh)</i>
2014	4,687,965
2015	4,600,009
2016	4,726,433
2017	4,787,858
2018	4,969,986
2019	4,999,522
2020	4,782,786
2021	4,772,031
2022	5,575,424
2023	5,818,926
2024 Forecast	5,750,224
2025 Forecast	5,885,378

Based on our high-level review of Otter Tail’s sales forecasting approach and the simple trend analysis shown above, the Department concludes the Company’s forecasted 2025 system sales appear reasonable, considering the new Large Commercial class customer added in 2022 in North Dakota. The Department recommends the Commission approve Otter Tail’s forecasted 2025 system sales for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

## *2. Otter Tail’s 2025 Forecast of Net System FCA Costs*

Consistent with its 2024 FCA/EAR forecast, Otter Tail used the EnCompass software to estimate the economic dispatch<sup>17</sup> of available resources to meet its 2025 energy requirements and provided the following description of the EnCompass model:

Otter Tail uses EnCompass (resource planning modeling software) to perform the majority of the generation fuel, purchased power, and asset-based sales forecasting. EnCompass performs full year, 8,760<sup>18</sup> hourly modeling with features such as operating parameters for generating units and uses the sales forecast ... as the basis to determine the energy requirements for Otter Tail’s system.

The EnCompass model performs an economic dispatch of available resources to meet the energy requirements, taking into account operational specifications and performance parameters of existing thermal resources (heat rates, maintenance schedules, forced outage rates, minimum/maximum capabilities), hydro units, owned wind and solar, and power purchase agreements. Price forecasts for oil, coal, and

<sup>16</sup> Petition, page 5, Table 2.

<sup>17</sup> The Energy Policy Act of 2005 defines “economic dispatch” as “the operation of generation facilities to produce energy at the lowest cost to reliably serve customers, recognizing any operational limits of generation and transmission facilities.”

Source : [https://www.energy.gov/sites/prod/files/oeprod/DocumentsandMedia/final\\_ED\\_03\\_01\\_07\\_rev2.pdf](https://www.energy.gov/sites/prod/files/oeprod/DocumentsandMedia/final_ED_03_01_07_rev2.pdf)

<sup>18</sup> 24 hours per day by 365 days per year.

natural gas, as well as forecasted locational marginal prices (LMPs) for the Otter Tail load zone (OTP.OTP) are used as key inputs into EnCompass. There are also 'shapes' or 'profiles' for retail sales, energy prices, and renewable generation used in EnCompass that determine retail sales and economic dispatch.<sup>19</sup>

Petition Attachment 3.1 shows the 2024 results of the EnCompass economic dispatch forecast, including the MWh and FCA costs forecasted for plant generation, purchased power, and asset-based sales. These EnCompass results support the Company's forecasted 2025 net system FCA costs of \$140,775,339, which represent a decrease of \$9,301,354 or about 6.2%,<sup>20</sup> from the approved 2024 forecast.

As in prior years, the Department's review of Otter Tail's 2025 net system FCA costs assesses the reasonableness of the amounts incorporated into this estimate and identifies costs inconsistent with historical data.

The Department's review of the instant forecast did not identify any issues warranting adjustment. The following discussion addresses the subcategories of the 2025 forecasted FCA costs.

The following Table 5 (\$/MWh), Table 6 (MWh), and Table 7 (\$) summarize the data Otter Tail provided on plant generation, wholesale market charges, purchased power, wind curtailment, and asset-based sales. These additional requirements were filed in compliance with the March 12, 2024, Order of Docket No. E-999/CI-03-802.<sup>21</sup> The Department notes that an update to these compliance items was provided in response to an Information Request (IR) issued by the Department.<sup>22</sup> The below tables reflect the updated data.

**Table 5: Otter Tail's FCA 2021–2023 Historical Net Cost Data \$/MWh<sup>23</sup> Compared to 2025 Forecast**

<i>FCA Component Category</i>		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	Plant Generation	17.44	17.04	20.76	18.44	18.67
2	Purchased Power	40.81	34.34	40.77	33.01	36.41
3	Wind Curtailment	39.22	51.41	33.24	31.80	33.36
4	Asset Based Sales	-63.38	-34.55	-66.95	-37.47	-44.04
5	<b>Net System FCA</b>	<b>23.00</b>	<b>20.59</b>	<b>24.85</b>	<b>21.03</b>	<b>22.21</b>

<sup>19</sup> Petition, page 9.

<sup>20</sup>  $(\$150,076,693 - \$140,775,339) = \$9,301,354 \rightarrow \$9,301,354 / \$150,076,693 = 6.2\%$ .

<sup>21</sup> Petition, page 28 and Attachment 12, page 1-3.

<sup>22</sup> DOC IR 02, Attachment 1--'Att 12 \$', 'Att 12 MWh', and 'Att 12 \$ per MWh'.

<sup>23</sup> To arrive at the average \$/MWh amounts shown in Table 5, the dollar amounts in Table 7 are divided by the MWh amounts in Table 6 for each applicable FCA category.

Table 5 shows Otter Tail’s net system \$/MWh 2025 forecast is 3.6% higher than the corresponding 2021 – 2023 average. This higher forecasted \$/MWh figure is driven primarily by the higher \$/MWh forecasted costs, described in detail below.

**Table 6: Otter Tail’s FCA 2021 – 2023 Historical MWh Data Compared to 2025 Forecast**

<i>FCA Component Category</i>		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	Plant Generation	3,895,315	3,519,911	3,128,313	3,217,521	3,288,582
2	Purchased Power	2,355,460	2,693,048	2,921,422	2,108,120	2,574,197
3	Wind Curtailment	3,256	1,062	22,625	10,615	11,434
4	Asset Based Sales	133,231	348,728	263,805	416,066	342,866
5	<b>Net System FCA<sup>24</sup></b>	<b>6,120,800</b>	<b>5,865,293</b>	<b>5,808,556</b>	<b>4,920,191</b>	<b>5,531,346</b>

**Table 7: Otter Tail’s FCA 2021 – 2023 Historical Net Cost (\$) Data Compared to 2025 Forecast**

<i>FCA Component Category</i>		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	Plant Generation	67,931,785	59,966,575	64,941,756	59,326,596	61,411,642
2	Wholesale Market Charges	-13,067,870	-15,054,796	-18,205,852	-10,186,025	-14,482,224
3	Purchased Power	96,130,445	92,485,212	119,095,331	69,581,124	93,720,556
4	Wind Curtailment	127,718	54,571	752,132	337,570	381,424
5	Asset Based Sales	-8,444,419	-12,047,753	-17,662,312	-15,589,196	-15,099,754
6	<b>Hoot Lake Solar Credit, Steam and Water Sales Margin and Reagent Costs, and Planning Resource Auction Revenues</b>	<b>-1,902,320</b>	<b>-4,640,571</b>	<b>-4,573,586.10</b>	<b>N/A</b>	<b>N/A</b>
7	<b>Net System FCA<sup>25</sup></b>	<b>140,775,339</b>	<b>120,763,238</b>	<b>144,347,469</b>	<b>103,470,069</b>	<b>122,860,259</b>

Otter Tail explained the reason for variances between the 2025 forecast and 2021-2023 averaged actuals for the costs and revenues associated with each of the FCA component categories. The Company’s explanation for these variances is summarized as follows:<sup>26</sup>

- Otter Tail’s 2025 forecasted plant generation costs are approximately 11% higher than the 2021 – 2023 average. The Company explained this is due to increased forecasted dispatch of coal and natural gas units in lieu of market purchases because OTP-owned units are more economical than purchasing energy from the market.

<sup>24</sup> Line 5 = Sum of lines 1-3 minus line 4

<sup>25</sup> Line 6 = Sum of lines 1-6.

<sup>26</sup> DOC IR 02, Attachment 1, ‘Att 12 \$’.

- Otter Tail's 2025 forecasted net wholesale market charges are approximately 10% lower than the 2021 – 2023 average. This is a significant improvement from the 2024 forecast which was approximately 89% lower than the 2020 – 2022 average. The Company explained this difference is due to completion of transmission outages and upgrades in the Otter Tail service territory, resulting in congestion costs and financial transmission right revenues to decrease in 2024. This reduction results in a forecast elimination of the MISO wholesale energy market credit and a return to more typical expectation of a MISO wholesale energy market charges.
- Otter Tail's 2025 forecasted wind curtailment costs are approximately 67% lower than the 2021 – 2023 average. The Company noted this difference is due to lower forecasted MWh compared to recent years. **[TRADE SECRET DATA HAS BEEN EXCISED]**
- Otter Tail's 2025 forecasted asset-based sales, which are a credit to the FCA calculation, are approximately 44% lower than the 2021 – 2023 average. The Company explained forecasted OTP-owned resources' fuel cost per MWh is higher than in recent years, and decreasing forecasted energy market prices compared to recent years, leads to decreasing margins from asset-based sales.

The Department concludes Otter Tail's explanations addressing the differences between its 2025 forecasted FCA cost and revenue component categories and the corresponding 2021 – 2023 averages are overall reasonable.

*E. DISCUSSION OF OTTER TAIL'S 2025 FORECAST OF NET SYSTEM FCA COSTS BY CATEGORY*

In the upcoming subsections, the Department discusses each of the costs/credits contained in the broad categories Otter Tail used to calculate its 2025 net system FCA cost: plant generation, wholesale market charges, purchased power, wind curtailment, and asset-based sales.

*1. Plant Generation*

The following Table 8 (\$/MWh), Table 9 (MWh), and Table 10 (\$), summarize the 2021 – 2023 actual and 2025 forecasted data Otter Tail provided for each of its generation plants.<sup>27</sup> Because wind and solar generation resources do not have associated fuel costs, the Department did not include rows for wind and solar per-unit fuel cost in Tables 8 and 10. Of note, Otter Tail placed the Merricourt wind facility and the Astoria natural gas facility into service in 2020 and 2021, respectively. The Company also retired its Hoot Lake coal facilities in 2021.

---

<sup>27</sup> Petition, page 28 and DOC IR 02, Attachment 1--'Att 12 \$', 'Att 12 MWh', and 'Att 12 \$ per MWh'.

**Table 8: Otter Tail's Generation 2021 – 2023 Historical \$/MWh<sup>28</sup> Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Plant Generation Total</b>	17.44	17.04	20.76	18.44	18.67
2	Total Coal	25.85	24.66	24.38	22.31	23.76
		<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
2.1	Big Stone					
2.2	Coyote					
2.3	Hoot Lake 2 & 3					
3	Total Wind					
4	Total Hydro					
5	Total Oil Peaking Units					
5.1	Jamestown 1					
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas					
6.1	Solway					
6.2	Astoria					
7	Total Solar	0	0	0	0	N/A

<sup>28</sup> To arrive at the average \$/MWh amounts shown in Table 8, the dollar amounts in Table 10 are divided by the MWh amounts in Table 9 for each applicable category.

**Table 9: Otter Tail's Generation 2021 – 2023 Historical MWh Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Plant Generation Total</b>	3,895,315	3,519,911	3,128,313	3,217,521	3,288,582
2	Total Coal	1,986,376	1,759,136	1,819,294	1,877,694	1,818,708
2.1	Big Stone	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
2.2	Coyote					
2.3	Hoot Lake 2 & 3					
3	Total Wind	1,281,553	1,145,385	1,034,186	959,910	1,046,494
3.1	Langdon Wind	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
3.2	Ashtabula Wind					
3.3	Ashtabula III					
3.4	Luverne Wind					
3.5	Merricourt					
4	Total Hydro	20,000	8,846	12,850	14,299	11,998
5	Total Oil Peaking Units	874	946	1,050	2,889	1,628
5.1	Jamestown 1	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
6.1	Solway					
6.2	Astoria					
7	Total Solar	86,717	34,982	96	96	11,725
7.1	Solar – Hoot Lake Solar	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
7.2	Solar - Blue Jay					
7.3	Solar - Blue Heron					



**Table 10: Otter Tail’s Generation 2021 – 2023 Historical Cost (\$) Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Plant Generation Total</b>	67,931,785	59,966,575	64,941,756	59,326,596	61,411,642
2	Total Coal <sup>29</sup>	51,353,826	43,373,589	44,363,283	41,891,976	43,209,616
		<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
2.1	Big Stone					
2.2	Coyote					
2.3	Hoot Lake 2 & 3					
3	Total Wind	0	0	0	0	0
4	Total Hydro	0	0	0	0	0
5	Total Oil Peaking Units	246,353	443,227	479,355	872,315	598,299
		<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
5.1	Jamestown 1					
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas					
6.1	Solway					
6.2	Astoria					
7	Total Solar	0	0	0	0	N/A

Overall, Otter Tail’s forecasted 2025 system FCA costs for Company-owned generation is higher than the 2021 – 2023 actual three-year average. Though Company-owned generation on a dollar per MWh basis for 2025 compared to 2021-2023 three-year average is an approximate 7% decrease overall (shown in Table 8), the increase in MWh production is projected to be around 18% (Table 9). These higher overall generation costs and MWh production increases are reasonable given the current and anticipated market conditions, and the Company’s expectation that its Coal and Natural Gas units will run more instead of higher market purchases.

Based on our review, the Department concludes Otter Tail’s forecasted 2025 system FCA costs for Company-owned generating units appears reasonable. The Department recommends the Commission approve Otter Tail’s forecasted 2025 system FCA costs for Company-owned generation for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

<sup>29</sup> Includes cost of fuel oil for coal generation facilities.

2. Wholesale Market Charges

Table 11 below summarizes the 2021 – 2023 actual and 2025 forecasted data Otter Tail provided for its wholesale market charges.<sup>30</sup>

**Table 11: Otter Tail’s 2021 – 2023 Historical and 2025 Forecasted Wholesale Market Charges (\$)**

	<i>Wholesale Market Category</i>	<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Total Net Wholesale Market Charges</b>	-13,067,870	-15,054,796	-18,205,852	-10,186,025	-14,482,224
2	MISO Wholesale Market Charges (Non-Energy)	-11,265,769	-15,437,990	-14,430,995	-7,233,575	-12,367,520
3	SPP Wholesale Market Charges (Non-Energy)	-1,327,608	917,700	-3,513,429	-2,391,957	-1,662,562
4	MISO ASM	-474,493	-534,506	-261,428	-560,492	-452,142

Otter Tail provided the following description of each wholesale market charges category:

**MISO [Midcontinent Independent System Operator] Wholesale Market Charges (Non-Energy):** This category forecasts numerous, miscellaneous MISO wholesale charges and credits including uplift charges, make whole payments, financial transmission rights charges and credits, real time miscellaneous charges, etc. This summary also includes forecasting for net congestion and net loss charges and credits. These are charges and costs associated with moving energy from Otter Tail generation resources to Otter Tail load.

...

**SPP [Southwest Power Pool] Wholesale Market Charges (Non-Energy):** The primary drivers of the SPP wholesale market charges forecast are the Real-Time Over Collected Losses Distribution Amount, the Real-Time Pseudo-Tie Congestion Amount, the Real-Time Pseudo-Tie Loss Amount, and the Auction revenue Rights Annual Daily Amount, and the Auction Revenue Rights Annual Closeout Amount. These charge types are the result of Otter Tail’s required SPP transmission service necessary to serve Otter Tail’s pseudo tied load within the SPP footprint. This category also forecasts other numerous, miscellaneous SPP wholesale charges and credits.

**MISO ASM [Ancillary Services Market] Market Charges:** This category forecasts MISO ASM charges and credits, including regulation reserves, spinning reserves, supplemental reserves, and short-term reserves, both withdrawn by Otter Tail load and produced by Otter Tail generation. It also includes other miscellaneous charges associated with the ASM market.<sup>31</sup>

<sup>30</sup> DOC IR 02, Attachment 1--‘Att 12 \$’, ‘Att 12 MWh’, and ‘Att 12 \$ per MWh’.

<sup>31</sup> Petition, pages 19 - 20.

The Company also described how it forecasted the wholesale market charges:

Approximately 70 different MISO and SPP wholesale market charge types are included in this forecast. Each charge type is forecasted individually. Varying forecasting methods such as averaging, application of calculated historical rates, and scaling to meet forecasted loads are the primary methods employed to forecast the different charge types noted above. All forecasting methods are based on historical data and future projections. For historical data, Otter Tail used the most recent 24 months of available data, which included April of 2022 through March of 2024.<sup>32</sup>

The Department notes that Petition Attachments 4.1 - 4.3 of the 2025 filing identify all charges and revenues for the MISO wholesale market, SPP wholesale market, and MISO ASM transactions included in the forecasted 2025 system FCA costs. While the Company's wholesale market charges have fluctuated over time, Otter Tail's proposed revenue/credit (a subtraction from the FCA calculation) of \$13,067,870 for 2025 is approximately 10% lower than the corresponding 2021 - 2023 average revenue/credit of \$14,482,224. The primary driver causing this decrease was the SPP Wholesale Market Charges. The Department issued DOC IR 3 to gain clarity on what was driving the decrease. In their response, the Company states the "the primary driver of the variance is the changing market dynamics driven by changes in congestion patterns. The forecast is developed based on two years of history attempting to capture the changing congestion patterns."<sup>33</sup>

Based on our review, the Department concludes Otter Tail's forecasted 2025 wholesale market charges appear reasonable. The Department recommends the Commission approve Otter Tail's forecasted 2025 wholesale market charges for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

### *3. Purchased Power*

The following Table 12 (\$/MWh), Table 13 (MWh), and Table 14 (\$) summarize the 2021 – 2023 actual and 2025 forecasted data Otter Tail provided for its purchased power.<sup>34</sup>

---

<sup>32</sup> Petition, page 19.

<sup>33</sup> Department Attachment 1.

<sup>34</sup> DOC IR 02, Attachment 1--'Att 12 \$', 'Att 12 MWh', and 'Att 12 \$ per MWh'.

**Table 12: Otter Tail’s Purchased Power 2021 – 2023 Historical \$/MWh<sup>35</sup> Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Total Purchased Power</b>	40.81	34.34	40.77	33.01	36.41
2	Edgeley PPA	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
3	Langdon PPA					
4	Ashtabula III PPA					
5	WAPA Energy Imbalance					
6	Shared Loads					
7	Small Co-Gen					
8	Bilateral Purchases					
9	Market Purchases					

**Table 13: Otter Tail’s Purchased Power 2021 – 2023 Historical MWh Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Total Purchased Power<sup>36</sup></b>	2,355,460	2,693,048	2,921,422	2,108,120	2,574,197
2	Edgeley PPA	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
3	Langdon PPA					
4	Ashtabula III PPA <sup>37</sup>					
5	WAPA Energy Imbalance					
6	Shared Loads					
7	Small Co-Gen					
8	Bilateral Purchases					
9	Market Purchases					

<sup>35</sup> To arrive at the average \$/MWh amounts shown in Table 12, the dollar amounts in Table 14 are divided by the MWh amounts in Table 13 for each applicable category.

<sup>36</sup> Line 1 = Sum of lines 2 - 9.

<sup>37</sup> Ashtabula III became OTP-owned in 2023.

**Table 14: Otter Tail’s Purchased Power 2021 – 2023 Historical Cost (\$) Data Compared to 2025 Forecast**

		<i>2025 Forecast</i>	<i>2023 Actuals</i>	<i>2022 Actuals</i>	<i>2021 Actuals</i>	<i>2021-23 Average</i>
1	<b>Total Purchased Power<sup>38</sup></b>	96,130,445	92,485,212	119,095,331	69,581,124	93,720,556
2	Edgeley PPA	<b>[TRADE SECRET DATA HAS BEEN EXCISED]</b>				
3	Langdon PPA					
4	Ashtabula III PPA					
5	WAPA Energy Imbalance					
6	Shared Loads					
7	Small Co-Gen					
8	Bilateral Purchases					
9	Market Purchases					

Market purchases are a major determining factor in the overall cost of purchased power, and, as Otter Tail explained, the economic dispatch model determines the amount of market purchases as follows:

As a member of MISO, each day Otter Tail offers all of its available generation into the MISO market and acquires all its energy from the MISO market. From a cost of energy perspective, the proceeds from the sale of Otter Tail’s generation into the market offsets costs associated with energy withdrawals for load. In instances where Otter Tail load is greater than Otter Tail’s combined dispatch generation and existing purchased power amounts, Otter Tail procures the remaining energy from the market. Forecasted market purchases are determined using the EnCompass model to project hourly economic dispatch of generation where the forecasted hourly market prices are compared to the marginal cost of Otter Tail’s thermal units. If the hourly market price is less than the marginal cost of Otter Tail’s units, an hourly market purchase is made (subject to self-commitment and minimum run restrictions on the thermal units).<sup>39</sup>

Otter Tail’s forecasted 2025 MWh amount of purchased power is lower than the 2021 – 2023 average, with an 8.5% decrease, mainly due to Ashtabula III PPA being OTP owned as of 2023. However, the \$/MWh amount forecasted for 2025 is 3% higher than the 2021 – 2023 average, due to the expected increases in energy market prices.

<sup>38</sup> Line 1 = Sum of lines 2 - 9.

<sup>39</sup> Petition, page 16.

Based on our review, the Department concludes Otter Tail’s forecasted 2025 purchased power costs appear reasonable. The Department recommends the Commission approve Otter Tail’s forecasted 2025 purchase power costs for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

4. Wind Curtailment

Table 15 below summarizes the 2021 – 2023 actual and 2025 forecasted data Otter Tail provided for its wind curtailment.<sup>40</sup>

**Table 15: Otter Tail’s 2021 – 2023 Historical and 2025 Forecasted Wind Curtailment**

		2025 Forecast	2023 Actuals	2022 Actuals	2021 Actuals	2021-23 Average
1	Wind Curtailment (\$/MWh)	39.22	51.41	33.24	31.80	33.36
2	Wind Curtailment (MWh)	3,256	1,062	22,625	10,615	11,434
3	Wind Curtailment (\$)	127,718	54,571	752,132	337,570	381,424

Otter Tail explained it developed its monthly forecasted 2025 wind curtailment costs using the monthly averages “of the available actual wind curtailment MWh for the wind PPA(s) subject to wind curtailment. Forecasted wind curtailment costs were then determined by multiplying the forecasted monthly MWhs by the 2025 blended forecasted annual average cost per MWh of Otter Tail’s wind PPAs subject to wind curtailment.”<sup>41</sup> Since Ashtabula III became an Otter Tail-owned wind resource in 2023, the 2025 forecasted MWh is approximately 77% lower for wind curtailments than the 2021-2023 average. Given the fluctuation in historical wind curtailment costs and the *de minimis* amounts involved, the Department does not raise an issue at this time regarding the Company’s 2024 forecast of these costs.

The Department recommends the Commission approve Otter Tail’s forecasted 2025 wind curtailment costs for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

<sup>40</sup> DOC IR 02, Attachment 1--‘Att 12 \$’, ‘Att 12 MWh’, and ‘Att 12 \$ per MWh’.

<sup>41</sup> Petition, page 18.

### 5. Asset-Based Sales

Table 16 below summarizes the 2021 – 2023 actual and 2025 forecasted data Otter Tail provided for its asset-based sales.<sup>42</sup>

**Table 16: Otter Tail’s 2021 – 2023 Historical and 2025 Forecasted Asset-Based Sales<sup>43</sup>**

		2025 Forecast	2023 Actuals	2022 Actuals	2021 Actuals	2021-23 Average
1	Asset Based Sales (\$/MWh)	63.38	34.55	66.95	37.47	44.04
2	Asset Based Sales (MWh)	133,231	348,728	263,805	416,066	342,866
3	Asset Based Sales (\$)	8,444,419	12,047,753	17,662,312	15,589,196	15,099,754

Otter Tail explained the economic dispatch model determines the amount of asset-based sales as follows:

In certain situations, Otter Tail may sell more energy into the market from its generation fleet than what Otter Tail needs to serve its own load. In these situations, any asset-based margins that are realized are credited to the EAR rate calculation. Asset-based margins are the net difference between asset-based sales and the fuel cost of sales associated with asset-based sales. Similar to market purchases, forecasted asset-based sales are derived from the hourly economic dispatch where the hourly market prices are compared to the marginal cost of Otter Tail’s thermal units (that are running to meet customer load). If the hourly market price is more than the marginal cost of Otter Tail’s units (and the unit generation is not needed to meet customer need), Otter Tail’s unit is assumed to be dispatched and an hourly asset-based sale is made.<sup>44</sup>

In its Petition, Otter Tail noted “[t]he 2025 forecasted asset-based sales are higher than historical asset-based sales due to the interdependent relationship of all the 2025 EnCompass model inputs and was the result of the EnCompass model determining there were more instances where an asset-based sale would be made in this 2025 forecast compared to recent history. The 2025 forecasted asset-based sales amount of \$8.4 million.”<sup>45</sup>

Based on our review, the Department concludes Otter Tail’s forecasted 2025 asset-based sales appear reasonable. The Department recommends the Commission approve Otter Tail’s forecasted 2025 asset-based sales revenue for the purpose of setting initial 2025 FCA/EAR rates in this proceeding, subject to the subsequent true-up.

<sup>42</sup> Petition, Attachment 12, pages 1-3.

<sup>43</sup> The Department did not separate the components of the asset-based sales (fuel costs and asset-based margins) in Table 16, because Otter Tail provided combined MWh and \$/MWh data for its asset-based sales.

<sup>44</sup> Petition, page 18.

<sup>45</sup> Petition, page 26.

*F. MISO PLANNING RESOURCE AUCTION REVENUES*

The Department notes MISO operates an annual PRA which covers the period from June through May of the following year. The annual PRA allows utilities to purchase needed capacity or sell excess capacity for the upcoming planning year. Historically, the prices paid or received under the annual PRA have been minimal. For example, in MISO's 2020-2021 PRA, the capacity auction clearing prices totaled approximately \$5 per megawatt-day.<sup>46</sup>

On April 14, 2022, MISO issued the results of its 2022-2023 Planning Resource Auction which covers the period from June 2022 through May 2023. As shown in the April 14, 2020, MISO Resource Adequacy presentation, the capacity auction clearing prices totaled approximately \$237 per megawatt-day.<sup>47</sup> As a result, the Department asked Minnesota Power, Otter Tail Power, and Xcel Energy several questions regarding their 2022-2023 PRA results. According to Otter Tail, it sold 871.5 MW for \$75,280,954.35 the 2022-2023 PRA.<sup>48</sup>

The Department also asked The Company how and where it planned to return these PRA revenues to ratepayers. Otter Tail replied:<sup>49</sup>

As described below, capacity costs and revenues are not part of Otter Tail's Energy Adjustment Rider (EAR or FCA), and changes to such costs/revenues between general rate cases have not resulted in rate adjustments outside of general rate cases for OTP. It may be that the Department could more clearly spell out what kind of proposal it is suggesting by this question and clarify if it is proposing a change to how capacity costs/revenues will be treated going forward (i.e., would the proposal result in routine periodic changes to rates for changes to capacity costs/revenues, or is the question suggesting a one-time adjustment?). As noted, past capacity-related charges and costs have not been part of Otter Tail's Energy Adjustment Rider (EAR or FCA) nor any other periodically or automatically adjusting mechanism. Instead, net resource adequacy related capacity charges and credits have been included in general rate case test years, accounted for either as purchased capacity costs or in the case of capacity sales, and adjustments to rates for changes to such costs/revenues between cases have not been made. While Otter Tail does not recall any prior rate case being triggered solely by changes to capacity costs or revenues, hypothetically, if such changes were significant enough, they could result in a rate case proceeding -- if the change caused a material deficiency, the utility would file a rate case; similarly, if the change created a material surplus, there is a statutory process that the

---

<sup>46</sup> Per MISO's 2020 State of the Market Report:

<https://cdn.misoenergy.org/2020%20State%20of%20the%20Market%20Report364567.pdf>

<sup>47</sup> Per MISO's 2022-2023 PRA results: <https://cdn.misoenergy.org/2022%20PRA%20Results624053.pdf>

<sup>48</sup> Per Otter Tail's Response to Department Information Request No. 13 in Docket No. E002/AA-20-462.

<sup>49</sup> Per Otter Tail's Response to Department Information Request No. 13 in Docket No. E002/AA-20-462.



Commission could follow to require a rate case filing to consider whether rates should be reduced. Aside from these processes, there is no current mechanism that permits or requires rate changes for changes to these costs/revenues between cases.

Since the Department understood capacity prices in PRAs were likely to remain elevated for the foreseeable future, we recommended Otter Tail provide in reply comments an estimate of PRA revenues, and recalculated FCA/EAR rates, it expected to receive during its 2023 FCA forecast period covering January 2023 through December 2023. The Department's position was since customers pay for plant and purchased capacity costs; the related revenues should be given back to customers.

On August 1, 2022, the Company filed reply comments respectfully disagreeing with the Department's request to include MISO PRA revenues in the EAR. The Department filed response comments on October 7, 2022, with a continued recommendation that the Commission require Otter Tail to include the PRA revenues in the 2023 FCA/EAR rates.

Otter Tail filed supplemental comments on October 20, 2022, proposing the Commission either approve the FCA and associated rates as submitted in its original May 2022 filing, or alternatively, approve the proposal to incorporate PRA revenues or costs into the EAR, in what amounted to a two-way ROE tracker. The Department filed a response on November 17, 2022, expressing its opposition to the proposed tracker and continued recommendation to include the revenues only in the EAR.

On December 29, 2022, the Commission filed its Order Approving Forecasted Rates as Modified and Requiring Revised 2023 Forecast and Customer Notice. In that Order, the Commission required Otter Tail to reduce its 2023 FCA forecasted fuel costs by \$3.89 million to reflect credits for PRA revenues. On page 22 of the instant petition, Otter Tail states their 2023 FCA rates were updated to include that revenue and that they will update the 2023 rates for June-December as soon as those results are known.

At the time of the Company's May 1, 2023, initial petition requesting approval of its 2024 FCA/EAR forecast, estimated MISO PRA costs/revenues were uncertain. Otter Tail proposed to include the 2024 portion of the Planning Year 2023/2024 results in the forecast and provide updated rates in their reply comments, if the results were material. On July 31, 2023, Otter Tail filed reply comments in Docket No. E017/AA-23-181, reporting PRA revenues received of \$329,908. Since the PRA revenues are under a quarter percentage point change, the revenue was deemed immaterial. Therefore, Otter Tail proposed they be included in the 2023 annual FCA True-Up filing.

Otter Tail included the PRA revenues of \$329,908 in their March 1, 2024, FCA True-Up filing in Docket No. E017/AA-22-214. The Department filed comments on the 2023 annual FCA True-Up filing on April 15, 2024. The FCA True-Up was approved by the Commission on June 27, 2024, pending final Orders.

Regarding PRA costs/revenues for 2025, the Company included the following:

No estimated PRA costs or revenues for the 2025 portion of the June 2024/May 2025 MISO planning year are included in this EAR forecast due to uncertainty in the ability to forecast those results. Once the Planning Year 2024/2025 results are known, if they are material, Otter Tail will include the 2025 portion of those results in the forecast and provide updated rates with our July 31, 2024 Reply Comments in this Docket.<sup>50</sup>

The Department appreciates the Company's work in MISO PRA costs/revenues and will look forward to reviewing updates to Otter Tail's EAR forecast in reply comments.

#### *G. CUSTOMER NOTIFICATION*

Otter Tail provided its proposed customer notification in Petition Attachment 10. The Department verified the language in this notification is consistent with language approved in the Company's 2024 FCA/EAR forecast in Docket No. E017/AA-23-181. The Department recommends the Commission approve the Company's proposed customer notification, updated as applicable with the effective date and rates approved in the instant Petition.

#### *H. OTHER ITEMS*

The Department noted a few miscellaneous items related to Otter Tail's 2025 FCA/EAR forecast which warrant discussion in the instant comments. The Department addresses these items in the following subsections.

##### *1. Rate Case Outcomes Impacting Otter Tail's EAR*

In its most recent rate case in Docket No. E017/GR-20-719, the Company requested Commission approval to transition recovery of reagent<sup>51</sup> expenses from base rates to the EAR, a transition that would occur together with the implementation of final base rates. Otter Tail's coal-fired generation facilities use reagents to process emissions in compliance with federal regulations. The Company did not include reagent expenses in its 2022 FCA/EAR forecast because the Commission had not yet made final determinations in Otter Tail's pending rate case. In the instant Petition however, Otter Tail did include forecasted reagent expenses for 2025<sup>52</sup> because the Commission approved the transition in the rate case.<sup>53</sup> Reagent recovery will be reevaluated in the next rate case.

Otter Tail also requested Commission authorization in Docket No. E017/GR-20-719 to move the revenues and expenses associated with the Company's steam/water sales from base rates to the EAR. The Company sells the steam and water from its Big Stone Plant. Otter Tail previously allocated the revenues and fuel/reagent expenses associated with those steam/water sales to Other Electric Revenue and Other Electric Expenses, respectively. The Company included the steam/water sale revenue and expenses in

---

<sup>50</sup> Petition, page 22.

<sup>51</sup> Reagents include anhydrous ammonia, pebble lime, and powder activated carbon.

<sup>52</sup> Petition attachment 3.1, lines 110-125.

<sup>53</sup> Docket No. E017/GR-20-719, Order dated February 1, 2022, Order Point 32.

the current 2025 FCA/EAR forecast<sup>54</sup> because the Commission approved Otter Tail's request to move them to the EAR.

The Department reviewed the forecasted steam and water sales and have incorporated them into Table 7 above.

### *2. Connection to Docket No. E999/CI-19-704*

The record in Docket No. E999/CI-19-704, an investigation into the self-commitment and self-scheduling of large baseload generation facilities, includes discussions on whether additional analyses and reporting on Otter Tail's Coyote plant should be included in the Company's future FCA filings. On June 15, 2021, the Department filed comments in Docket No. E999/CI-19-704 and recommended the following on pages 7 – 8 of those comments:

Given that Coyote's operations will be explored in Otter Tail's upcoming resource plan docket, if any changes to Coyote's operations are recommended, then those will be explored in subsequent fuel cost dockets. The Department will continue to monitor all such dockets to analyze what is in the best interest of ratepayers.

Initially, Otter Tail's ongoing resource plan (Docket No. E017/RP-21-339) recommended exiting from Coyote Station in 2028. Otter Tail's March 1, 2022, Annual Compliance Filing in E999/CI-19-704 stated the following regarding Coyote, "At the end of April 2021, Coyote co-owners implemented coordinated offer processes that allowed for joint economic offer capability." However, on March 31, 2023, Otter Tail filed its updated resource plan where it paused its earlier proposal to withdraw ownership in Coyote. This matter was discussed at the May 30, 2024, Commission Agenda meeting, Order is pending.

Since the dispatch status and retirement dates of OTP's baseload units are being addressed in other proceedings, the Department will not address them here.

### *3. Otter Tail's Potential Revisions to Its 2025 Forecast*

If, in the instant docket, Otter Tail submits a revised 2025 forecast (as the Company did in its 2021 forecast in Docket No. E017/AA-20-462), the Department recommends the Company include the following in reply comments:

- Identify all inputs to the economic dispatch model with revised value(s), with a narrative fully describing each and all such inputs. For each such input, explain the need for the value(s) revision and fully justify the reasonableness of the corresponding revised value(s).
- Provide revised red-lined and clean versions of Tables 2 - 16 included in the Department's comments, with a narrative explaining and fully justifying any data changes.
- Provide revised responses to all the Department's discovery to date.

---

<sup>54</sup> Petition, attachment 3.2, lines 1-9.

### **III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS**

The Department concludes Otter Tail's 2025 FCA/EAR forecast is overall reasonable, and we recommend the Commission take the following action:

- Accept Otter Tail's Petition as complying with the FCA/EAR forecast reporting requirements.
- Approve Otter Tail's 5,885,378 MWh of forecasted sales subject to the FCA/EAR and the \$140,775,339 in net system FCA/EAR costs including the corresponding forecasted EAR rates for each customer class (Petition Attachment 2).
- Approve the Company's proposed customer notification, updated as applicable with the effective date and rates approved in the instant Petition.

The Department requests Otter Tail provide information on the 2024 MISO actual PRA costs and revenues in Otter Tail's reply comments.

If, in the instant docket, Otter Tail submits a revised 2025 forecast (as the Company did in its 2021 forecast in Docket No. E017/AA-20-462), the Department recommends the Company include the following in reply comments:

- Identify all inputs to the economic dispatch model with revised value(s), with a narrative fully describing each and all such inputs. For each such input, explain the need for the value(s) revision and fully justify the reasonableness of the corresponding revised value(s).
- Provide revised red-lined and clean versions of all tables (Tables 2 - 16) included in the Department's comments, with a narrative explaining and fully justifying any data changes.
- Provide revised responses to all the Department's discovery to date.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-24-065

Response to: MN Department of Commerce

Analyst: Ashley Uphus

Date Received: May 09, 2024

Date Due: May 21, 2024

Date of Response: May 21, 2024

Responding Witness: Amber Stalboerger, Manager, Regulatory Analysis, 218-739-8728

---

Information Request:

Topic: SPP Wholesale Market Charges

Reference(s): Petition Attachment 12, page 1

**Request:**

Please provide additional detail on what is driving the -55% variance from the 2025 forecast to the 3-year average for SPP Wholesale Market Charges.

Attachments: 0

Response:

In drafting the response to Information Request MN-DOC-003 Otter Tail discovered that some of the averages in Attachment 12 were not calculated correctly. The correct calculations are provided in Attachment 01 to MN-DOC-002, Tab 'Att 12 \$ NOT PUBLIC.' These corrected calculations do not impact the calculation of the 2025 EAR rates. The recalculation of the average SPP Wholesale Market Charges results in a negative twenty percent variance from the three-year average to the 2025 forecast. The primary driver of the variance is the changing market dynamics driven by changes in congestion patterns. The forecast is developed based on two years of history attempting to capture the changing congestion patterns. This is demonstrated in the "RT Pseudo Tie Congestion Amount," "RT Pseudo Tie Loss Amount," and "RT Over-Collected Losses and Distribution Amount."

## **CERTIFICATE OF SERVICE**

I, Sharon Ferguson, hereby certify that I have this day, served copies of the following document on the attached list of persons by electronic filing, certified mail, e-mail, or by depositing a true and correct copy thereof properly enveloped with postage paid in the United States Mail at St. Paul, Minnesota.

**Minnesota Department of Commerce  
Public Comments**

**Docket No. E017/AA-24-65**

Dated this **1<sup>st</sup>** day of **July 2024**

**/s/Sharon Ferguson**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Mariah	Bevins	Maria.Bevins@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_24-65_AA-24-65
Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_24-65_AA-24-65
Chris	Byrnes	cbyrnes@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_24-65_AA-24-65
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_24-65_AA-24-65
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-65_AA-24-65
Jason	Decker	jason.decker@llojbwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_24-65_AA-24-65
Richard	Dornfeld	Richard.Dornfeld@ag.state.mn.us	Office of the Attorney General-DOC	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_24-65_AA-24-65
Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_24-65_AA-24-65
Remi	Engbers	remi.engbers@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_24-65_AA-24-65
Kelly C.	Engebretson	Kelly.Engebretson@lawmoss.com	Moss & Barnett	150 S. 5th St #1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Michael	Fairbanks	Michael.Fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418 White Earth, MN 56591	Electronic Service	No	OFF_SL_24-65_AA-24-65
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_24-65_AA-24-65
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_24-65_AA-24-65
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_24-65_AA-24-65
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_24-65_AA-24-65
Annete	Henkel	mui@mutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St. Paul, MN 55101	Electronic Service	No	OFF_SL_24-65_AA-24-65
Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club	2101 Webster St Ste 1300 Oakland, CA 94612	Electronic Service	No	OFF_SL_24-65_AA-24-65
Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota St Suite 1400 St. Paul, MN 55101-2134	Electronic Service	No	OFF_SL_24-65_AA-24-65
Faron	Jackson, Sr.	faron.jackson@llojibwe.net	Leech Lake Band of Ojibwe	190 Sailstar Drive NW Cass Lake, MN 56633	Electronic Service	No	OFF_SL_24-65_AA-24-65
Richard	Johnson	Rick.Johnson@lawmoss.com	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65



First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_24-65_AA-24-65
Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP	2200 IDS Center 80 S 8th St Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65
Bill	Lachowitz	blachowitz@ibewlocal949.org	IBEW Local Union 949	12908 Nicollet Ave S  Burnsville, MN 55337-3527	Electronic Service	No	OFF_SL_24-65_AA-24-65
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620  St. Paul, MN 551640620	Electronic Service	No	OFF_SL_24-65_AA-24-65
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd  Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_24-65_AA-24-65
Tim	Miller	Tim.Miller@mrenergy.com	Missouri River Energy Services	3724 W Avera Dr PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_24-65_AA-24-65
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-65_AA-24-65
Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power	30 W Superior S  Duluth, MN 55802	Electronic Service	No	OFF_SL_24-65_AA-24-65

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade Street Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_24-65_AA-24-65
Rate Case Inbox	Rate Case Inbox	mnrates@otpc.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_24-65_AA-24-65
Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company	215 S. Cascade Street  Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_24-65_AA-24-65
Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_24-65_AA-24-65
Peter	Scholtz	peter.scholtz@ag.state.mn.us	Office of the Attorney General-RUD	Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	No	OFF_SL_24-65_AA-24-65
Robert H.	Schulte	rhs@schultheassociates.com	Schulte Associates LLC	1742 Patriot Rd  Northfield, MN 55057	Electronic Service	No	OFF_SL_24-65_AA-24-65
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350  Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_24-65_AA-24-65
Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates	7400 Lyndale Ave S Ste 190  Richfield, MN 55423	Electronic Service	No	OFF_SL_24-65_AA-24-65
Amber	Stalboerger	astalboerger@otpc.com	Otter Tail Power Company	215 South Cascade St. PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	Yes	OFF_SL_24-65_AA-24-65
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street  Fergus Falls, MN 56537	Electronic Service	Yes	OFF_SL_24-65_AA-24-65

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
William	Taylor	bill.taylor@taylorlawsd.com	Taylor Law Firm	4820 E. 57th Street Suite B Sioux Falls, SD 57108	Electronic Service	No	OFF_SL_24-65_AA-24-65
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_24-65_AA-24-65
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_24-65_AA-24-65
Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club	Environmental Law Program 1536 Wynkoop St Ste 200 Denver, CO 80202	Electronic Service	No	OFF_SL_24-65_AA-24-65
Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee	PO Box 418  White Earth, MN 56591	Electronic Service	No	OFF_SL_24-65_AA-24-65
Patrick	Zomer	Pat.Zomer@lawmoss.com	Moss & Barnett PA	150 S 5th St #1200  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_24-65_AA-24-65