

October 9, 2025

**PUBLIC DOCUMENT**

Sasha Bergman  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce  
Docket No. E017/M-25-338

Dear Ms. Bergman,

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

*In the Matter of Otter Tail Power Company's Petition for Approval of the  
Distributed Solar Energy Standard Projects*

The Petition was filed by Otter Tail Power on August 29, 2025.

The Department recommends **approval** and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

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

BP/SR/wp  
Attachment



## Before the Minnesota Public Utilities Commission

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### PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/M-25-338

#### I. INTRODUCTION

On August 29, 2025, Otter Tail Power Company (OTP or the Company) filed the *Company's Petition for Approval of the Distributed Solar Energy Standard Projects*,<sup>1</sup> seeking approval for two projects:

- 1) the 4.55<sup>2</sup> MW Pelican Rapids Solar Project
- 2) the 4.2 MW Parkers Prairie Solar Project

OTP intends to develop these projects to meet the Company's obligations under the Distributed Solar Energy Standard (DSES), established by Minn. Stat. §216B.1691, subd. 2h,<sup>3</sup> which requires the Company to generate one percent of its retail electricity sales from distributed solar of 10 MW or less by December 31, 2030, and to select projects using a competitive bidding process approved by the Commission. The Petition follows the Commission's *Order Clarifying Implementation of Distributed Solar Energy Standard*,<sup>4</sup> which directs utilities to use a request for proposal (RFP) process for DSES procurement and to verify compliance with prevailing wage requirements. In addition to project approval, OTP requests that the Commission find both projects eligible for DSES compliance and authorize future cost recovery through the Company's Renewable Resource Cost Recovery Rider (RRCR).

#### II. PROCEDURAL BACKGROUND

August 29, 2025	The Company filed the Petition, seeking approval of the Projects and recovery of the associated costs through the RRCR.
September 9, 2025	The Commission posted a <i>Notice of Comment Period</i> <sup>5</sup> (Notice) for the petition.

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<sup>1</sup> *In the Matter of Otter Tail Power Company's Petition for Approval of the Distributed Solar Energy Standard Projects*, OTP, Petition, August 29, 2025, Docket No. E017/M-25-338, (eDockets) [20258-222598-02](#), (hereinafter "Petition").

<sup>2</sup> The Department notes a discrepancy in the Petition regarding the capacity of the Pelican Rapids Solar Project, which is listed as 4.85 MW (pg. 1 and 3), and 4.55 MW (pg. 4 and 9). When the Department asked about this the Company clarified that the correct capacity is 4.55 MW.

<sup>3</sup> [Minn. Stat. §216B.1691, subd. 2h](#) (2024), (hereinafter "DSES Statute").

<sup>4</sup> *In the Matter of the Implementation of the New Distribution Solar Energy Standard Pursuant to 2023 Amendments to Minnesota Statutes, Section 216.1691, Order Clarifying Implementation of Distributed Solar Energy Standard*, June 26, 2024, Docket No. E002, E015, E017/CI-23-403, (eDockets) [20246-207978-01](#), (hereinafter "DSES Order").

<sup>5</sup> *In the Matter of Otter Tail Power Company's Petition for Approval of the Distributed Solar Energy Standard Projects, Notice of Comment Period*, September 9, 2025, Docket No. E017/M-25-338, (eDockets) [20259-222809-01](#), (hereinafter "Notice").

According to the Notice, the following topics are open for comment:

1. Should the Commission approve Otter Tail Power's investments in the Pelican Rapids and Parkers Prairie Projects?
2. Should the Commission determine the Projects qualify towards the DSES?
3. Should the Commission authorize future cost recovery of the Projects through the Renewable Resources Cost Recovery (RRCR) Rider?
4. Are there other issues or concerns related to this matter?

The following comments from the Minnesota Department of Commerce (Department) address the issues raised in the Notice.

### III. DEPARTMENT ANALYSIS

#### A. *SHOULD THE COMMISSION APPROVE OTTER TAIL POWER'S INVESTMENTS IN THE PELICAN RAPIDS AND PARKERS PRAIRIE PROJECTS?*

The Department recommends approval of the Company's investments in the Pelican Rapids and Parkers Prairie projects. The Department finds the selection process satisfies the Commission's requirements for competitive bidding and independent oversight. The Department also finds the projects qualify towards the DSES (further detailed in Section III. B).

##### A.1. *Competitive Bidding Process*

The DSES requires utilities to select projects using a competitive bidding process approved by the Commission:<sup>6</sup>

A public utility shall select projects to satisfy the standard established under this subdivision through a competitive bidding process approved by the commission.

The Company filed its request for proposals (RFP) on November 1, 2024.<sup>7</sup> The Department reviewed the proposed RFP and approved the RFP.<sup>8</sup> This approval of the RFP affirmed that the rules of the proposed competitive bidding process were fair and legally sound before any bids were solicited.

##### A.2. *OTP's Evaluations of the Proposed Bids*

OTP evaluated the bids it received using two-phased approach that was detailed in the RFP. The first phase was "[t]hreshold review" designed to ensure that each proposal met the basic, non-negotiable

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<sup>6</sup> DSES Statute (e).

<sup>7</sup> *In the Matter of the Implementation of the New Distributed Solar Energy Standard Pursuant to 2023 Amendments to Minnesota Statutes, Section 216B.1691, Otter Tail Power Company, Request for Proposals, Docket No. E002, E015, E017/CI-23-403, (eDockets) [202411-211542-01](#), (hereinafter "RFP").*

<sup>8</sup> *In the Matter of the Implementation of the New Distributed Solar Energy Standard Pursuant to 2023 Amendments to Minnesota Statutes, Section 216B.1691, Letter from the Minnesota Department of Commerce Otter Tail Power's Distributed Solar Energy Standard Request for Proposals, Docket No. E002, E015, E017/CI-23-403, (eDockets) [202412-212586-03](#).*

requirements of the solicitation. The threshold review included checks for compliance—including project size, location, and labor requirements—and verification of financial viability. All six<sup>9</sup> proposals received from the three bidders (and OTP's own self-build proposals) passed this initial screening.

The second phase was a detailed “Key Parameters Review and Scoring,” where each qualifying proposal was scored on a 100-point scale. The scoring was heavily weighted toward cost, with the project’s Levelized Cost of Energy (LCOE)<sup>10</sup> accounting for a maximum of 50 points. The remaining points were allocated to non-price factors, including developer experience (20 points), project viability (15 points), site control (5 points), safety (5 points), reliability benefits such as battery storage (5 points), and the inclusion of pollinator-friendly habitats (5 points).

The Department reviewed the spreadsheet<sup>11</sup> OTP used to perform these calculations and can confirm that the scoring was conducted accurately and in a manner consistent with the approved RFP methodology. The final scores were used to rank the projects, and the highest-scoring proposals—the Pelican Rapids and Parkers Prairie self-build projects—were selected to move forward for Commission approval.

#### A.3. *Independent Report*

The Order requires the RFP to “state that if the utility submits a project into any particular competitive bidding process, there shall be an independent auditor to monitor the bidding.”<sup>12</sup> As OTP submitted self-build projects into the competitive bidding process, it hired an independent auditor, Leidos Engineering, LLC, to review the Company’s RFP, evaluation, and selection process. OTP filed the Independent Auditor Report<sup>13</sup> (Audit) with the Petition on September 3, 2025. The primary objectives of the Audit were to:<sup>14</sup>

1. Assess whether the Solicitation Process documents and associated attachments provided sufficient and consistent information for Potential Bidders to prepare competitive proposals;
2. Identify any potential bias in evaluation criteria, process, proposal modeling, selection process, or treatment of Bidders/proposals;
3. Establish that the evaluation criteria were applied in a fair and unbiased manner and that a consistent, transparent methodology was used to rank proposals;
4. Assess whether the components of the process conformed to accepted industry standards; and
5. Identify any irregularities in the Solicitation Process.

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<sup>9</sup> OTP received six different proposals from outside bidders; two of those proposals contained battery storage options.

<sup>10</sup> The Department notes a calculation error in Table 2 of the Petition for the Parkers Prairie Solar Project's Price/kW (AC). This was due to the use of an incorrect capacity figure (4.55 MW instead of 4.2 MW). When the Department asked about this the Company acknowledged this error, which does not affect the bid evaluation metrics or the LCOE.

<sup>11</sup> Department Attachment 1, Company response to DOC IR No. 1.

<sup>12</sup> Order Point 3.g.

<sup>13</sup> *In the Matter of Otter Tail Power’s Petition for Approval of the Distributed Solar Energy Standard Projects*, Otter Tail Power, Independent Auditor Report, September 3, 2025, Docket No. E017/M-25-338, (eDockets) [20259-222677-01](#), (hereinafter “Audit”).

<sup>14</sup> Audit at 5.

The Audit provides a comprehensive review of OTP's actions from the development of the RFP documents through the final selection of the winning projects. The Audit concludes that the Solicitation and the Audit Process was conducted properly and fairly:<sup>15</sup>

The Independent Auditor was satisfied by the level of review and analysis every proposal received. OTP's efforts were well documented, detailed, and candid. The comments and conclusions of reviewers were well reasoned and documented. The models developed by OTP were robust, well organized, and represent quality work products. The overall Solicitation Process was well executed, well documented, and consistent. OTP devoted significant resources to administration of the Solicitation Process and the Independent Auditor is of the opinion that these efforts deserve proper regard in this Report.

The Department reviewed the Audit, which, as OTP petitions, fulfills the Commission Order's requirement for independent oversight. Based on the comprehensive review, the Department finds the auditor's conclusions to be well-supported and accepts the report as a thorough and complete assessment of the bidding process.

*B. SHOULD THE COMMISSION DETERMINE THE PROJECTS QUALIFY TOWARDS THE DSES?*

The Department recommends that the Commission determine the Pelican Rapids and Parkers Prairie projects qualify towards the DSES. The Department finds that the projects satisfy all applicable statutory requirements, that includes the DSES eligibility criteria, the prevailing wage rate and apprenticeship requirements, and the use of a competitive bidding process.

*B.1. Distributed solar energy standard*

*B.1.1. Statutory Requirements*

The Petition was filed under the Distributed Solar Energy Standard (DSES),<sup>3</sup> established by Minn. Stat. §216B.1691, subd. 2h. The DSES requires utilities with fewer than 100,000 retail electric customers to generate one percent of its total retail sales, excluding sales to industrial customers, from distributed solar. The DSES statute<sup>16</sup> states that:

In addition to the other requirements of this section, by the end of 2030, the following proportions of a public utility's total retail electric sales in Minnesota must be generated from solar energy generating systems:

[...]

(3) [for] a public utility with fewer than 100,000 retail electric customers in Minnesota, at least one percent.

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<sup>15</sup> Audit at 19.

<sup>16</sup> DSES Statute (b).

The statute defines four specific eligibility criteria for these facilities that require the projects to:<sup>17</sup>

- (1) have a capacity of ten megawatts or less;
- (2) be connected to the public utility's distribution system;
- (3) be located in the Minnesota service territory of the public utility; and
- (4) be constructed or procured after August 1, 2023.

Both the Company's proposed projects in the Petition, the 4.55 MW Pelican Rapids Solar Project and the 4.2 MW Parkers Prairie Solar Project, meet each of these statutory requirements.

#### *B.1.2. Compliance with Prevailing Wage Rate and Apprenticeship Program*

The DSES requires all bidders to commit to using prevailing wage labor and registered apprenticeship programs:<sup>18</sup>

A solar energy generating system with a capacity of 100 kilowatts or more does not count toward compliance with the standard established in paragraph (a) unless the public utility verifies that construction trades workers who constructed the solar energy generating system were all paid no less than the prevailing wage rate, as defined in section 177.42, and whose employer participated in an apprenticeship program that is registered under...

In its approval letter,<sup>11</sup> the Department noted that it had reviewed OTP's method for verifying these labor standards and found it consistent with processes approved by the Commission.

### *C. SHOULD THE COMMISSION AUTHORIZE FUTURE COST RECOVERY OF THE PROJECTS THROUGH THE RENEWABLE RESOURCES COST RECOVERY (RRCR) RIDER?*

#### *C.1. Cost and Cost Recovery*

OTP asks the Commission to authorize use of the Renewable Resources Cost Recovery (RRCR) Rider for the two projects, with specific cost recovery to be reviewed in a later filing under Minn. Stat. 216B.1645, subd. 2a:<sup>19</sup>

A utility may petition the commission to approve a rate schedule that provides for the automatic adjustment of charges to recover prudently incurred investments, expenses, or costs associated with facilities constructed, owned, or operated by a utility to satisfy the requirements of section 216B.1691, provided those facilities were previously approved by the commission under section 216B.2422 or 216B.243, or were

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<sup>17</sup> DSES Statute (c).

<sup>18</sup> DSES Statute (d).

<sup>19</sup> [Minn. Stat. § 216B.1645, subd. 2a](#) (2024).

determined by the commission to be reasonable and prudent under section 216B.243, subdivision 9. For facilities not subject to review by the commission under section 216B.2422 or 216B.243, a utility shall petition the commission for eligibility for cost recovery under this section prior to requesting cost recovery for the facility.

The Petition is not subject to review by the Commission under 216B.2422<sup>20</sup> or 216B.243<sup>21</sup>; therefore, the Company filed the Petition to request cost recovery under Minn. Stat. § 216B.1645, subd. 2a. No rate changes are requested in this petition, however, OTP proposes to submit the detailed project costs for a full prudence review in a future docket, as required by statute.

The Department finds that the Company's request to use the RRCR for the Project cost recovery has been filed correctly, provided it is followed by a future prudence review of the actual costs. The Department recommends allowing cost recovery through the RRCR, subject to Commission review of OTP's future prudence filing. The Department recommends that the Company's future prudence filing include a complete cost breakdown, tax credit assumptions, and documentation that shows all federal incentives and labor compliance costs are reflected in the final customer impact.

OTP also requests expedited consideration in light of the U.S. Treasury Department's guidance issued August 15, 2025, regarding safe-harbor rules. OTP indicates a Commission decision by February 2026 would help preserve optionality to qualify under the new guidance if needed, even though current schedules target in-service dates in 2029. The Department supports this request.

### C.2. *Reporting Requirement*

The Department recommends a comprehensive reporting requirement to ensure transparency, cost control, and timely delivery. The Department recommends the following reporting framework:

- Pre-construction filing: This filing should include the final site summary, interconnection application status and expected study milestones, prevailing wage rate and apprenticeship compliance plan, and tax credit eligibility pathway.
- Semi-annual construction status reports: These filing should include schedule progress, interconnection updates, variance explanations (for more than 10% increase in cost or schedule), and prevailing wage rate and compliance summary to date.
- Post-commercial operation date compliance report: This filing should include the final built capacity, actual in-service date, total capital and owner's costs, updated revenue-requirement inputs for RRCR, confirmation of renewable energy credit (REC) retirement for DSES, and final prevailing wage rate and documentation.

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<sup>20</sup> [Minn. Stat. § 216B.2422](#) (2024) (Resource Planning; Renewable Energy).

<sup>21</sup> [Minn. Stat. §216B.243](#) (2024) (Certificate of Need for Large Energy Facility).

#### IV. DEPARTMENT RECOMMENDATIONS

Based on the analysis of the Petition and the information in the record, the Department has prepared recommendations, which are provided below. The recommendations correspond to the subheadings of Section III above.

**A. *SHOULD THE COMMISSION APPROVE OTTER TAIL POWER'S INVESTMENTS IN THE PELICAN RAPIDS AND PARKERS PRAIRIE PROJECTS?***

- The Department recommends approval of the Company's investments in the Pelican Rapids and Parkers Prairie projects. The Department finds the selection process satisfies the Commission's requirements for competitive bidding and independent oversight.

**B. *SHOULD THE COMMISSION DETERMINE THE PROJECTS QUALIFY TOWARDS THE DSES?***

- The Department recommends that the Commission determine the Pelican Rapids and Parkers Prairie projects qualify towards the DSES. The Department finds that the projects satisfy all applicable statutory requirements, that includes the DSES eligibility criteria, the prevailing wage rate and apprenticeship requirements, and the use of a competitive bidding process.

**C. *SHOULD THE COMMISSION AUTHORIZE FUTURE COST RECOVERY OF THE PROJECTS THROUGH THE RENEWABLE RESOURCES COST RECOVERY (RRCR) RIDER?***

- C.1 The Department recommends allowing cost recovery through the RRCR, subject to Commission review of OTP's future prudence filing. The Department recommends that the Company's future prudence filing include a complete cost breakdown, tax credit assumptions, and documentation that shows that all federal incentives and labor compliance costs are reflected in the final customer impact.
- C.1 The Department supports OTP's request for expedited consideration of its petition in order for the Company to secure safe harbor under the U.S. Treasury Department's guidance.
- C.2 The Department recommends a comprehensive reporting requirement to ensure transparency, cost control, and timely delivery.

## Attachments

**PUBLIC DOCUMENT – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED**  
**Response to Information Request MN-DOC-001**  
**Page 1 of 1**

**OTTER TAIL POWER COMPANY**  
**Docket No: E017-M-25-338**

Response to: MN Department of Commerce

Analyst: Stephen Rakow, Bhavin Pradhan

Date Received: September 03, 2025

Date Due: September 15, 2025

Date of Response: September 05, 2025

Responding Witness: Nathan Jensen, Manager, Resource Planning - (218) 739-8989

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**Information Request:**

Please provide a Microsoft Excel Spreadsheet with formulas intact demonstrating how the data in Table 4 of the Petition was calculated.

**Attachments:** 1

Attachment 1 to IR MN\_DOC\_001\_PUBLIC.pdf

**Response:**

Attachment 1 to MN-DOC-001 is the live version of Otter Tail Power Company's (OTP or Company) Distributed Solar Energy Standard Projects concerning Table 4 in the Company's Initial Filing ("the Model"), which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. The Model therefore is (1) "trade secret information", as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A). OTP is requesting that the data used in the Model concerning the projects evaluated by the Company be treated as "trade secret information" as well as the Model itself, which is proprietary to the Company.

Please see Attachment 1 in response to Information Request MN-DOC-001 for Table 4 which is found on the "Pricing" tab of the attached spreadsheet.

**PUBLIC DOCUMENT – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED**  
**Response to Information Request MN-DOC-002**  
**Page 1 of 1**

**OTTER TAIL POWER COMPANY**  
Docket No: E017-M-25-338

Response to: MN Department of Commerce

Analyst: Stephen Rakow, Bhavin Pradhan

Date Received: September 03, 2025

Date Due: September 15, 2025

Date of Response: September 05, 2025

Responding Witness: Nathan Jensen, Manager, Resource Planning - (218) 739-8989

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**Information Request:**

Please provide a Microsoft Excel Spreadsheet with formulas intact demonstrating how the data in Table 5 of the Petition was calculated.

**Attachments:** 0

**Response:**

Attachment 1 to MN-DOC-002 is the live version of Otter Tail Power Company's (OTP or Company) Distributed Solar Energy Standard Projects concerning Table 5 in the Company's Initial Filing ("the Model"), which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use. The Model therefore is (1) "trade secret information", as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A). OTP is requesting that the data used in the Model concerning the projects evaluated by the Company be treated as "trade secret information" as well as the Model itself, which is proprietary to the Company.

Please refer to Attachment 1 in response to Information Request MN-DOC-001 for Table 5 which can be found on the "Summary" tab of the spreadsheet.

## **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/M-25-338**

Dated this 9<sup>th</sup> day of **October 2025**

**/s/Sharon Ferguson**

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Sasha	Bergman	sasha.bergman@state.mn.us		Public Utilities Commission		Electronic Service		Yes	M-25-338
2	Mike	Bull	mike.bull@state.mn.us		Public Utilities Commission	121 7th Place East, Suite 350 St. Paul MN, 55101 United States	Electronic Service		Yes	M-25-338
3	Ray	Choquette	rchoquette@agg.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-338
4	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		Yes	M-25-338
5	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	M-25-338
6	Paula	Foster	pfoster@otpc.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	M-25-338
7	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-338
8	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-25-338
9	Derek	Haugen	dhaugen@otpc.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		Yes	M-25-338
10	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-338
11	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-338
12	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-338
13	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-338

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-338
15	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-338
16	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	M-25-338
17	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, 55101-2131 United States	Electronic Service		Yes	M-25-338
18	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		Yes	M-25-338
19	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	M-25-338