215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)

December 9, 2024

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

PUBLIC DOCUMENT
NOT PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED

RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Solway and Abercrombie Solar Projects
Docket No. E017/M-24-
Initial Filing

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) hereby submits this Petition to the Minnesota Public Utilities Commission (Commission) for approval of investments in (a) the 50-megawatt (MW) Solway Solar Project, a solar generation facility to be constructed near Solway, Minnesota, and (b) the 295 MW Abercrombie Solar Project, a solar generation facility to be constructed in Abercrombie Township, Richland County, North Dakota. The Petition also requests that the Commission determine that the Solway and Abercrombie Solar Projects are qualified for application towards Otter Tail Power's obligations under Minnesota's renewable energy objective (REO) and standards, including the Eligible Energy Technology Standard (EETS) and the Carbon Free Standard (CFS). The Petition also requests the Commission authorize future cost recovery for the Solway and Abercrombie Solar Projects through Otter Tail Power's Renewable Resources Cost Recovery Rider (Renewable Rider), subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

The Public version of the Petition is contemporaneously filed under a separate cover letter in this proceeding. Portions of the enclosed Petition are marked "TRADE SECRET" because those portions contain information Otter Tail Power considers to be trade secret data under Minn. Stat. §13.37(1)(b). This data includes confidential pricing, cost estimates and contract terms. This information has independent economic value from not being generally known to, and not being readily ascertainable by, other parties who could obtain economic value from its disclosure or use. Otter Tail Power has taken reasonable efforts to maintain the secrecy of the information marked as TRADE SECRET as the disclosure of this information could adversely affect Otter Tail Power in negotiations and procurement efforts, and potentially increase costs for services or our customers. Otter Tail Power has electronically filed this document with the Commission.

In compliance with Minn. R. 7829.1300, subp. 2, Otter Tail Power is serving a copy of this filing on the Minnesota Department of Commerce – Division of Energy Resources and the Minnesota Office of Attorney General – Residential Utilities Division. A Summary of the filing has been served on all persons on Otter Tail's Power's general service list. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8956 or at cstephenson@otpco.com.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

sjw
Enclosures
By electronic filing
c: Service List

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's Petition for Approval of the Solway and Abercrombie Solar Projects	**Docket No. E017/M-24-** **SUMMARY OF FILING**

On December 9, 2024, Otter Tail Power Company (Otter Tail Power) submitted a Petition to the Minnesota Public Utilities Commission (Commission) for approval of investments in (a) the 50-megawatt (MW) Solway Solar Project, a solar generation facility to be constructed near Solway, Minnesota, and (b) the 295 MW Abercrombie Solar Project, a solar generation facility to be constructed in Abercrombie Township, Richland County, North Dakota.

The Petition also requests that the Commission determine that the Solway and Abercrombie Solar Projects are qualified for application towards Otter Tail Power's obligation under Minnesota's renewable energy objective (REO) and standards, including the Eligible Energy Technologies Standard (EETS) and the Carbon Free Standard (CFS).

The Petition also requests the Commission authorize future cost recovery for the Solway and Abercrombie Solar Projects through Otter Tail Power's Renewable Resources Cost Recovery Rider (Renewable Rider), subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

PUBLIC DOCUMENT – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power Company's Petition for Approval of the Solway and Abercrombie Solar Projects	**Docket No. E017/M-24-** **PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail Power) respectfully requests approval by the Minnesota Public Utilities Commission (Commission) to invest in and recover costs for the Solway and Abercrombie Solar Projects. For each project, Otter Tail Power seeks a determination that (1) the project is qualified for application towards Otter Tail Power's renewable energy and carbon free statutory standards as set forth herein, and (2) that costs for each project are recoverable through Otter Tail Power's Renewable Resources Cost Recovery Rider (RRCR Rider or Renewable Rider), subject to Commission review and approval of specific costs to be presented by Otter Tail Power in future petitions under Minn. Stat. § 216B.1645, subd. 2a.

Solway Solar will be located in Beltrami County, Minnesota adjacent to Otter Tail Power's Solway Combustion Turbine Generating Station (Solway Peaking Plant) and will be constructed, owned, and operated by Otter Tail Power. With an operational capacity of 50 MW the Solway Solar Project will provide enough electricity to power approximately 9,000 homes annually.[1] Otter Tail Power proposes to interconnect the Solway Solar Project using existing interconnection rights at the Solway Peaking Plant via the Midcontinent Independent System Operator (MISO) surplus interconnection process.

Abercrombie Solar will be located in Richland County, North Dakota, near the Minnesota-North Dakota border and will be constructed, owned, and operated by Otter Tail Power. With a nameplate capacity of 295.1 MW, Abercrombie Solar will provide enough electricity to power approximately 59,000 homes annually. Abercrombie Solar will interconnect to Minnkota Power Cooperative's existing 230 kV line.

The Projects are necessary to meet the growing demand for renewable resources and are required to meet the Eligible Energy Technologies Standard (EETS) and the

[1] The nameplate capacity of the Solway Project will be 66 MW. As noted herein Otter Tail Power will be limited to 50 MWs of injection rights based on its existing MISO interconnection rights.

Carbon Free Standard (CFS) in Minn. Stat. § 216B.1691.[2] The Projects will help Otter Tail Power meet these standards while providing low-cost energy to its Minnesota customers. These Projects implement the solar generation resources authorized by the Commission's July 22, 2024 Integrated Resource Plan Order (IRP Order), which authorizes Otter Tail Power to acquire "[n]o less than 200 MWs and up to 300 MWs of solar resources with a commercial operation date of November 1, 2027, or as soon as practicable thereafter …".[3]

As discussed more fully below, the costs and benefits of these low-cost renewable resources will either be allocated between South Dakota and Minnesota or will be 100 percent allocated to Minnesota.[4] This approach is consistent with Otter Tail Power's efforts to maintain an integrated system approach for new generation resources whenever possible. This approach also recognizes cost impact concerns noted by the Commission in declining to approve full allocation of solar and wind projects set forth in the IRP Order to Minnesota customers, opting instead to consider allocation issues as projects are proposed.[5] South Dakota lacks an integrated planning process, and its participation in the Projects will be determined through a rider eligibility proceeding that Otter Tail will commence shortly after this filing. Otter Tail Power expects the South Dakota Public Utilities Commission will act while this Petition is pending.

To preserve the Project timelines Otter Tail Power Company respectfully requests that the Commission to act on this Petition by June 30, 2025.

II. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, subp. 1, a summary of the filing accompanies this Petition.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, subp. 3, the following information is provided.

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[2] Respectively Minn. Stat. § 216B.1691, subd. 2a and subd. 2g. The Eligible Energy Technologies Standards was formerly referred to as the Renewable Energy Standard.

[3] Order Modifying Otter Tail Power's 2023-2037 Integrated Resource Plan, July 22, 2024, Docket No. E017/RP-21-339, Ordering Point 11.

[4] As noted later in this Petition, the North Dakota Public Service Commission has declined to participate in the Projects.

[5] "Adding solar and wind resources will help Otter Tail Power meet the renewable energy and carbon-free standards and support Otter Tail Power's transition away from fossil-fuel-based resources. The Commission is supportive of adding these types of resources, but it is unclear how these projects will affect rates, especially when added to the costs of LNG storage at Astoria Station and AME at Coyote Station. The Commission will therefore not include in this order the language from the settlement agreement that allocates all costs and benefits of solar and wind projects to Minnesota customers only. Instead, allocation will be considered as each project is proposed." IRP Order p. 17.

A. Name, address, and telephone number of utility
(Minn. Rules 7829.1300, subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney
(Minn. Rules 7829.1300, subp. 3(B))

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, Minnesota 56538-0496
(218) 739-8956

C. Date of filing and proposed effective date of rates
(Minn. Rules 7829.1300, subp. 3(C))

The date of this filing is December 9, 2024. No rates or changes to rates are proposed by this filing.

D. Statutes controlling schedule for processing the filing
(Minn. Rules 7829.1300, subp. 3(D))

This filing is a "miscellaneous tariff filing" as defined by Minn. Rule 7829.0100, subp. 11. No determination of Otter Tail Power's overall revenue requirement is necessary under Minn. Stat. §§ 216B.1691 or 216B.1645. Minn. Rule, 7829.1400, subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter. The past practice of the Commission, however, is to issue a notice setting a schedule for comments and reply comments from interested parties.

E. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, subp. 3(E))

Derek Haugen
Rates Analyst
Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56537-0496
(218) 739-8444

Paula Foster
Supervisor, Regulatory Analysis
Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O Box 496
Fergus Falls, Minnesota 56538-0496
(218) 739-8042

F. Service List

(Minn. Rules 7829.0700)

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

Derek Haugen
Rates Analyst
Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8444
dhaugen@otpco.com

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
P.O. Box 496
(218) 739-8956
cstephenson@otpco.com

Paula Foster
Supervisor, Regulatory Analysis
Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8042
pfoster@otpco.com

Amber Grenier
Manager, Regulatory Economics
Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8728
agrenier@otpco.com

We request that all communications regarding this proceeding, including data requests, also be directed to:

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpco.com

G. Service on other parties

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

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

IV. DESCRIPTION AND PURPOSE OF FILING

Otter Tail Power is seeking a Commission determination that the Projects qualify towards its EETS and CFS obligations, and that the Projects qualify for cost recovery through Otter Tail Power's Renewable Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in future petitions.

This Petition is authorized by Minn. Stat. §216B.1645. Subdivision 1 of that statute authorizes the Commission to "approve or disapprove power purchase contracts, investments, or expenditures entered into or made by the utility to satisfy the wind and biomass mandates contained in sections 216B.169, 216B.2423, and 216B.2424, and to satisfy the renewable energy objectives and standards set forth in section 216B.1691 . . .." Under Subdivision 2a, utilities may petition the Commission to approve a rate schedule with an automatic adjustment of charges "to recover prudently incurred investments, expenses, or costs associated with facilities constructed, owned, or operated by a utility to satisfy Minnesota's renewable energy objectives and standards set forth in Minn. Stat. § 216B.1691."

The Commission established Otter Tail Power's Renewable Rider in Docket No. E017/M-08-119. Otter Tail Power seeks authority to use this vehicle to recover certain costs of the Projects as an EETS and CFS qualified resource addition, recognizing that specific project costs must be reviewed and approved in subsequent filings.

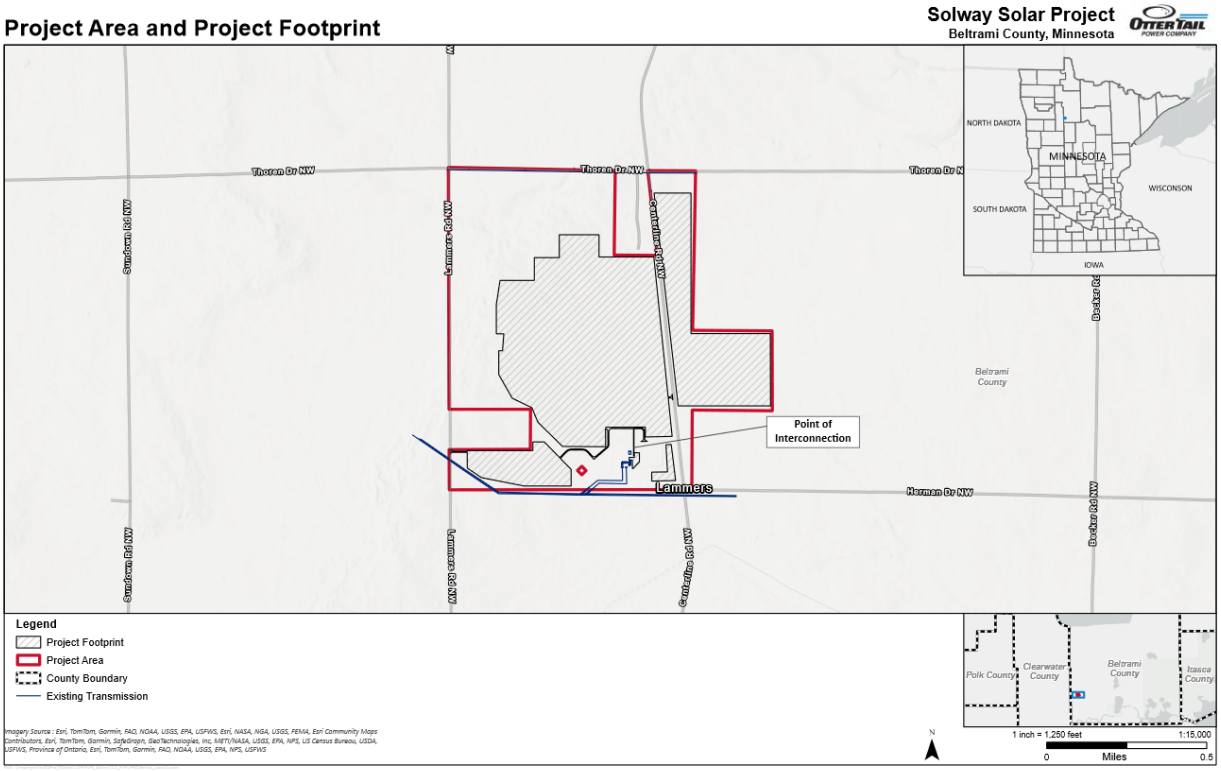
V. PROJECT DESCRIPTIONS

A. Solway Solar Project

Project Location & Description

Otter Tail Power proposes to construct and operate the Solway Solar Project, a solar energy conversion facility with an operational capacity of 50 MW, and a nameplate capacity of 66 MW in Lammers Township in Beltrami County, Minnesota. Otter Tail Power proposes to interconnect the Project using existing interconnection rights at the Solway Peaking Plant via the MISO surplus interconnection process. Connecting the Solway Project to the Point of Interconnection (POI) at this location will require an additional transformer and less than 500 feet of overhead transmission line.

Project Map



The Solway Project will consist of approximately 100,000 solar panels. While the Solway Project's nameplate capacity will be 66 MW, the operational capacity of the Project is limited to 50 MW of injection rights based on Otter Tail Power's existing MISO interconnection rights. Otter Tail Power plans to size the Project at 66 MW to minimize the overall effects of electrical losses and maximize the amount of production delivered to the POI during solar production hours. The as-built nameplate capacity of the Project

will be determined during final engineering phases, based on the panels selected, to minimize the overall levelized cost of energy to customers. The Project will provide enough electricity to power approximately 9,000 homes annually. The Project's annual energy output is expected to be approximately 101,616 MWh, at a projected net capacity factor of approximately 23.2 percent.

Estimated Project Schedule

Solway Solar is estimated to be commercially operational by year-end 2026. Otter Tail Power's Site Permit application for the Solway Project is pending before the Commission in Docket No. E017/GS-24-309. The following schedule (Table 1) is the anticipated timeline for the various phases of development. This schedule is based on information known at the time of this Petition filing.

Table 1 – Solway Project Schedule

Activity	Description	Timeline
Land Acquisition	Secure land rights necessary for development of the Project.	Complete
Interconnection Application	Approval from MISO to connect the Project to the grid and signed Interconnection Agreement.	Submitted July 8, 2024
Site Permit	Site Permit issuance for the Project.	October 2025
Other Permits	Obtain all federal, state, local, and tribal government permits and approvals necessary for construction and operation of the Project.	Prior to Construction
Equipment Procurement and Contractor Selection	Procurement of Project equipment. Final contractor selections will be made contingent on the Site Permit Application being approved by the Commission.	April through September, 2025
Construction	Construction of the Project.	October 1, 2025 through September 30, 2026
Testing and Commissioning	Testing and commissioning of project related equipment.	October 1, 2026
Operation	Commercial operation of the Project following construction and testing/commissioning activities.	December 31, 2026

Projected Project Cost

Otter Tail Power estimates the total capital cost of the Solway Solar Project will be approximately **[PROTECTED DATA BEGINS…**

…PROTECTED DATA ENDS]. As discussed below, the projected levelized cost of energy (LCOE) for the Project is **[PROTECTED DATA BEGINS… …PROTECTED DATA ENDS].**

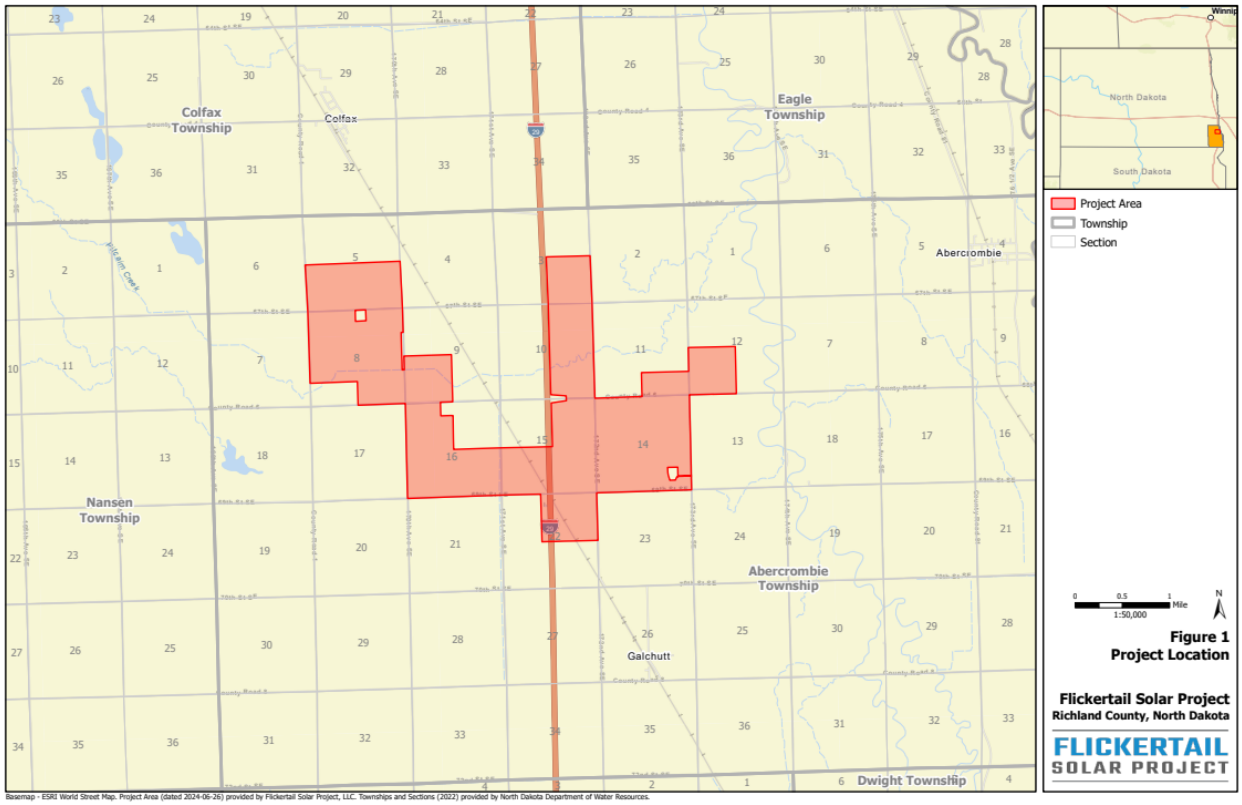
B. Abercrombie Solar Project

Project description

The Abercrombie Solar Project will consist of approximately 550,000 solar panels with a 295.1 MW solar energy conversion facility and associated facilities. The Abercrombie Solar Project will be located on approximately 3,464 acres of privately-owned land under agreement with Otter Tail Power in Abercrombie Township, Richland County, North Dakota. This project has the potential to power up to 59,000 homes annually. The Abercrombie Solar Project's initial annual energy output is expected to be approximately 658,419 MWh, at a projected net capacity factor of approximately 25.5 percent.

Otter Tail Power intends to construct a 230 kV generation tie (gen-tie) line of approximately 530 feet to facilitate the Project's interconnection. The gen-tie line would extend from the Project's collector substation and interconnect to Minnkota Power Cooperative's (Minnkota) existing Frontier-Wahpeton 230 kV transmission line via a line tap at a new switching station that will be permitted, constructed, and owned by Minnkota. The gen-tie line has been permitted through Abercrombie Township. Utilizing the interconnection rights at a known cost ensures that Otter Tail Power is able to keep costs as low as possible.

Project Map



The Abercrombie Solar Project has been developed to date as the Flickertail Solar Project by Flickertail Solar Project, LLC (Flickertail), a wholly owned subsidiary of Savion, LLC. On October 30, 2024, Otter Tail Power entered into an Asset Purchase Agreement (APA) with Flickertail to purchase the development assets of the project. The development assets to be acquired by Otter Tail Power under the APA include assets necessary or desirable for the development, construction, operation and maintenance of the Abercrombie Solar Project, including, but not limited to:

1. Site control & land rights documents
2. Permits and governmental approvals
3. Material contracts rights including the LGIA
4. Project plans, including conceptual designs and site plans
5. Project reports & surveys

The anticipated closing date of the of the APA is early Q3 2025. The APA calls for payments to Flickertail LLC upon closing of approximately **[PROTECTED DATA BEGINS… …PROTECTED DATA ENDS].** Numerous conditions,

including the Commission's approval of this Petition, must be satisfied prior to closing of the asset purchase under the APA. If regulatory approvals are not received, Otter Tail Power has the right to terminate the APA and end its involvement in the Project. Should Otter Tail Power terminate the Project because the Company is unable to secure all necessary regulatory approvals, **[PROTECTED DATA BEGINS…**

…PROTECTED DATA ENDS].

Estimated Project Schedule

The Abercrombie Solar Project is anticipated to be in commercial service by the end of 2028. The following schedule (Table 3) is the anticipated timeline for the various phases of development based on information known at the time of this Petition filing.[6]

Table 3 – Abercrombie Project Schedule

Activity	Description	Timeline
Land Acquisition	Secured voluntary lease agreements, easement agreements, or purchase options for the Project with landowners.	Complete
Abercrombie Township CUP	Application for Conditional Use Permit.	Received November 20, 2023
Obtaining the Certificate of Site Compatibility	Site Permit issuance for the Project.	Expected to be issued in the Second quarter of 2025
Other Permits	Obtain all permits and approvals necessary for construction and operation of the Project.	Prior to Construction
Construction	Construction of the Project.	First quarter of 2026 – Fourth quarter of 2028
Testing & Commissioning	Will be completed prior to the commercial operation date (COD) and typically takes three to six months.	Between First and Fourth quarter of 2028
Commencing commercial operation	Commercial operation of the Project following construction and testing/commissioning activities.	December 31, 2028

[6] This table is based on Flickertail's Application for a Certificate of Site Compatibility filed with the North Dakota Public Service Commission in Case No. PU-24-351.

Estimated Project Costs

Otter Tail Power estimates the total capital cost of the Abercrombie Solar Project will be approximately **[PROTECTED DATA BEGINS…**

…PROTECTED DATA ENDS]. As discussed below, the projected LCOE for the Project is **[PROTECTED DATA BEGINS… …PROTECTED DATA ENDS].** Otter Tail Power is currently in the procurement process for material and installation services for the balance of both Projects.

VI. JURISDICTIONAL ALLOCATIONS

Otter Tail Power intends to construct and operate the Solway and Abercrombie Solar Projects for the benefit of the Company's Minnesota and South Dakota customers. North Dakota will not participate in the Projects.[7] South Dakota's participation is

[7] In the Company's North Dakota Integrated Resource Plan (NDPSC Case No. PU-21-380) the North Dakota Public Service Commission (NDPSC) commissioned an Investigation Report that concluded no new renewable resources were necessary to serve North Dakota customers. The NDPSC has confirmed that this approach is consistent with North Dakota energy policy, and that it applies to new renewable resources sited in North Dakota, where such facilities enjoy a rebuttable presumption of prudence under N.D.C.C. 49-05-16. The NDPSC reiterated this point in an order dated December 4, 2024, wherein it noted that "the Commission does not support the addition of new wind or solar generation or battery storage through 2030 on behalf of North Dakota customers regardless of where they may be sited, including the potential North Dakota solar project OTP disclosed to the Commission during the October 18, 2024 Informal Hearing." See Order and Guidance on Integrated Resource Plan, December 4, 2024, p. 2.

contingent upon the South Dakota Public Utilities Commission (SDPUC) authorizing Otter Tail to recover project costs through the Company's South Dakota Phase-In Rider.[8]

If the SDPUC approves recovery of the Projects, the costs and output of the Projects would be allocated between South Dakota and Minnesota as shared resources, with adjustments made over time. Current allocations would result in approximately 80 percent of the Projects' costs and output being allocated to Otter Tail Power's Minnesota customers and 20 percent to South Dakota customers. South Dakota does not have an integrated resource planning process, and the only means to determine whether SDPUC will approve participation in and recovery for the Projects is through the above-referenced Phase-In Rider. The nature of the APA for the Abercrombie Project, and associated project procurement schedules requires the Company to present the Projects contemporaneously to the Commission and the SDPUC, with the SDPUC expected to act while this Petition is pending.

If the SDPUC does not approve recovery of these Projects, Otter Tail Power would then allocate 100 percent of the Projects' cost and output to Minnesota customers. The Projects would then operate like the Hoot Lake Solar Project, with 100 percent of the Projects' output allocated for use by Minnesota customers and 100 percent of Otter Tail Power's investment eligible for future recovery from Minnesota customers through Otter Tail Power's RRCR Rider.

As noted above, this approach is consistent with Otter Tail Power's efforts to maintain an integrated system approach for new generation resources when possible. This approach is also consistent with the IRP Order, where the Commission expressed concerns about adopting settlement language that would allocate the cost and benefits of CFS-driven resources solely to Minnesota customers. The Commission was particularly concerned about the potential cost impacts on Minnesota customers.[9] In view of these concerns, the Commission determined that it would assess allocations on a project-by-project basis.[10] Assuming for analysis that the Commission deems the Projects eligible for RRCR Rider recovery, Otter Tail Power subsequent RRCR Rider filing(s) seeking recovery of specific project costs will account for the allocation of costs between Minnesota and South Dakota or full allocation of the Projects' cost and benefits to Minnesota customers.

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[8] Otter Tail Power anticipates filing its Phase-In Rider petition with the SDPUC in December 2024, with a South Dakota determination likely to occur during the pendency of this Petition. Otter Tail Power will promptly alert the Commission and stakeholders of any determination made by the SDPUC.

[9] IRP Order p. 17.

[10] Id. Otter Tail construes the IRP Order to mean the Company should make reasonable efforts to have all its jurisdictions participate in projects selected to fulfill the renewable resource additions required under the MN IRP Order.

A related issue concerns accounting for the Solway Solar Project's impact on the Solway Peaker, an Otter Tail Power peaking plant the cost and benefits of which are allocated among all of Otter Tail Power Company's jurisdictions. The Solway Solar Project makes use of a surplus interconnection with the Solway Peaker being the incumbent generator. As is the case in any surplus interconnection, the non-incumbent generator must account for the impact its generation has on the incumbent generator. During some hours of operation, Solway Solar, which has no fuel costs, is anticipated to displace generation that would have otherwise been provided by the Solway Peaker. This anticipated displacement has revenue impacts that flow through fuel clauses in all jurisdictions served by the Solway Peaker. Because North Dakota will not be participating in the Solway Solar Project, but is allocated cost and benefits of the Solway Peaker, the impact of reduced peaking plant revenues caused by displacement from solar generation will be accounted for through reconciliation of MISO settlements. In broad terms, for the hours in which reduced peaking plant revenues occur, the potential profit margin of the peaking plant will be analyzed, and a dollar figure will be calculated and divided based on jurisdiction allocations, ensuring that our (1) North Dakota customers suffer no harm and (2) that our Minnesota and (potentially) South Dakota customers receive the full benefit and cost of the Solway Solar Project.

VII. INVESTMENTS IN THE SOLWAY AND ABERCROMBIE SOLAR PROJECTS ARE REASONABLE, PRUDENT, AND ELIGIBLE FOR INCLUSION IN THE RRCR RIDER

Based on the factors discussed below, Otter Tail Power requests the Commission approve Otter Tail Power's investments in the Solway and Abercrombie Solar Projects and determine that these investments are eligible for RRCR Rider recovery. These cost-effective projects are a reasonable and prudent way for Otter Tail Power to satisfy its renewable energy and carbon free statutory obligations and to support the Company's transition to carbon free generation for its Minnesota customers. The costs of each Project are substantially less than the next most competitive projects evaluated by Otter Tail Power, resulting in substantial savings for Minnesota customers. The Projects will protect Minnesota customers from fluctuations in energy market prices and significantly reduce carbon emissions.

The significant benefits provided by the Projects come with risks, the most significant of which is the risk of damage from extreme weather events, particularly for the Abercrombie Project because of its size and relatively condensed location. These risks can be mitigated in large part by thoughtful design. Other extreme risks such as significant tornadic activity appear very difficult to mitigate, whether by design or

insurance. Otter Tail Power believes the benefits these projects provide our customers outweigh these risks.

A. Minnesota Renewable Energy and Carbon Free Standards

The Projects are necessary for Otter Tail Power's compliance with Minnesota's renewable energy and carbon free standards. The CFS requires electric utilities to generate or acquire 80 percent of energy for Minnesota retail sales from carbon-free resources by 2030, 90 percent by 2035, and 100 percent by 2040.[11] This expands and builds upon the EETS requirement that public utilities generate or procure 55 percent of their energy used to serve Minnesota customers from renewables by 2035.[12]

The IRP Order authorizes the Company to acquire 200-300 MWs of solar resources with a commercial operation date of November 1, 2027, or as soon as practicable thereafter.[13] Collectively, the Projects represent 345 MW of new solar generation resources.[14] This figure exceeds the 200-300 MW of new solar resources called for in the IRP Order. The additional megawatts are warranted in part by the very favorable LCOE of these projects and the fact the additional megawatts of solar resources will be necessary for Otter Tail Power's compliance with the CFS without significant reliance on the purchase of renewable energy credits (RECs).

The following table reflects the impact of these Projects on Otter Tail Power's compliance with the EETS and CFS. The table also denotes that Otter Tail Power is now and will remain in compliance with Minesota's Solar Energy Standard (SES).[15] Table 5 assumes that the Projects will serve customers in Minnesota and South Dakota. Table 5 also assumes that Otter Tail Power will acquire 200 MW of wind resources by 2030 consistent with the IRP Order. The new wind resources, however, have not been allocated in any amount to South Dakota.

[11] Minn. Stat. § 216B.1691, subd. 2g.
[12] Minn. Stat. § 216B.1691, subd. 2a. Otter Tail Power currently satisfies the large-scale Solar Energy Standard under Minn. Stat. § 216B.1691, subd. 2f.
[13] *In the Matter of Otter Tail Power's 2023-2037 Integrated Resource Plan*, MPUC Docket No. E017/RP-21-339, Order Modifying Otter Tail Power's 2023–2037 Integration Resource Plan, Ordering Paragraph 11 at 20 (July 22, 2024).
[14] Together the Projects represents 366 MW of new nameplate capacity. The Solway Project's name plate capacity of 66 megawatts is operationally limited to 50 MWs of injection rights based on its existing MISO interconnection rights.
[15] Minn. Stat. § 216B.1691, subd. 2f. To be clear, Otter Tail continues to work toward full compliance with the small-scale solar requirement that at least 10 percent of the 1.5 percent standard be generated or procured from generators with a nameplate capacity of 40 kV or less.

Table 5[16]

Standards milestone dates														
	SES													
	RES			25%					80%					55%
	CFS													90%
		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
MN with Abercrombie and Solway Solar With SD participation Includes 2029 - 200 MW Wind	SES	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%
	RES - MN Renewable Generatin (RG) Only	25%	26%	26%	28%	31%	40%	50%	81%	81%	82%	80%	80%	80%
	CFS -MN Renewable Generation (RG) Only	25%	27%	28%	30%	32%	41%	51%	83%	83%	83%	82%	82%	82%
	CFS - RG and MISO North Region MPs*	50%	51%	48%	54%	60%	65%	70%	93%	93%	94%	92%	92%	92%

		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
MN without new solar resources or 2029 200 MW Wind	SES	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%
	RES - MN Renewable Generatin (RG) Only	25.3%	26%	26%	28%	28%	28%	27%	27%	27%	27%	26%	26%	26%
	CFS -MN Renewable Generation (RG) Only	25.3%	27%	28%	29%	30%	29%	29%	29%	29%	28%	27%	27%	27%
	CFS - RG and MISO North Region MPs*	49.8%	51%	49%	54%	59%	58%	56%	61%	60%	61%	60%	60%	60%

As Tables 5 reflects, the Projects position Otter Tail Power to comply with CFS standard of 80 percent carbon free generation by 2030 without reliance on the acquisition of RECs. Moreover, the Projects put the Company on a firm path for compliance with the 90 percent standard in 2035 and 100 percent standard in 2040.

While Otter Tail Power is optimistic that the SDPUC will approve and authorize cost recovery for the Projects, approval is not assured. If the SDPUC declines to participate in the Projects, Otter Tail Power will seek to allocate 100 percent of the Projects' cost and output to its Minnesota customers. In this case, the following Table 6 reflects the Project's' impact on Otter Tail Power's compliance with the Company's EETS and CFS obligations assuming 100 percent of the Projects' costs and outputs are allocated to Minnesota:

[16] References to the RES in this table refer to the EETS. To determine an allocation factor for both MN and SD for these two resources, Otter Tail Power's Resource Planning staff used their most recent company sales forecast (Q3 2024) which forecasts out in monthly increments through 2035. Each state's monthly energy forecast (MN & SD) was divided by the sum or MN's and SD's monthly energy forecast to determine a monthly allocation factor for each state. All other resources were allocated based on the same principle but includes all three jurisdictions (MN, ND, and SD) with the exception of Hoot Lake Solar, which is 100% allocated to MN, and the 2029 addition of 200 MW of wind, which assumes allocated 100% to MN. These allocations factors are loaded into EnCompass as a time series for each jurisdiction and allocated to the appropriate resources. This table is the result of this production cost modeling run and is specific to Minnesota's results. Actual allocation for future resources will be determined in future jurisdiction cost of service studies. The "CFS–RG and MISO North Region MPs (Market Purchases)" line of this table uses MISO's historical_gen_fuel_mix_2023 xlsx file (https://www.misoenergy.org/markets-and-operations/real-time--market-data/market-reports/#nt=%2FMarketReportType%3ASummary%2FMarketReportName%3AHistorical%20Generation%20Fuel%20Mix%20(xlsx)&t=10&p=0&s=MarketReportPublished&sd=desc) to determine what percentages of market purchases qualify as carbon-free per PUC order point #21 of Docket E-999/CI-23-151. This percentage for 2032 is assumed to be the same for all planning years through 2035 for modeling purposes.

Table 6

		2023	2024	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034	2035
MN with Abercrombie and Solway Solar Without SD participation Includes 2029 - 200 MW Wind	SES	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%	1.5%
	RES - MN Renewable Generatin (RG) Only	25%	26%	26%	28%	31%	42%	54%	86%	86%	86%	85%	85%	85%
	CFS -MN Renewable Generation (RG) Only	25%	27%	28%	30%	33%	44%	56%	87%	87%	87%	86%	86%	86%
	CFS - RG and MISO North Region MPs*	50%	51%	48%	54%	60%	67%	74%	97%	97%	98%	96%	96%	96%

If the Projects are fully allocated to Minnesota as depicted by Table 6, Otter Tail Power will be in full compliance with the 80 percent standard by 2030, and very close to full compliance with the 90 percent standard by 2035 without significant reliance on the acquisition of RECs. Here again, Otter Tail Power is well positioned for compliance with the 100 percent standard by 2040.

Beyond EETS and CFS compliance, the Projects are directly aligned with Minnesota's statutory goal that ten percent of the retail electric sales in Minnesota be generated by solar energy by 2030.[17] The Projects will partially replace energy production from Coyote Station, a coal-powered facility in North Dakota, a portion of which currently serves Otter Tail Power's Minnesota customers.

B. Competitive Selection Process and Project Costs

Otter Tail Power identified and selected the Solway and Abercrombie Solar Projects through the Company's competitive, flexible acquisition process; a process where Otter Tail Power's Development, Engineering & Construction (DEC) staff have on-going, iterative discussions with developers and suppliers for projects in MISO Zone 1 that align with Otter Tail Power's resource needs. Discussions with developers and suppliers concerning solar projects have been on-going since 2021 in recognition of Otter Tail Power's initial IRP filing, which called for 150 MW of new solar resources in the five-year action period. Otter Tail Power has described its flexible, competitive acquisition process, evaluation criteria, and the reasons why the Projects were selected in recent compliance filings in Otter Tail Power's IRP docket.[18]

The on-going, iterative communications with developers and suppliers are part of a winnowing and narrowing process designed to identify viable, competitively priced projects that correspond to Otter Tail Power's resource needs. In the initial stages of this process a potential project's competitiveness refers in large measure to the project's

[17] See Minn. Stat. § 216B.1691 subd. 2f (e).
[18] Otter Tail Power's August 16, 2024, IRP Compliance Filing described a three-step process to acquire Commission-authorized solar resources. As step one, the August 16th filing provided public notice to the Department of Commerce and other stakeholders that Otter Tail Power was in the process of procuring certain solar resources and explained how the Company would evaluate and select solar projects. Otter Tail Power's September 16, 2024, Compliance Filing (step two) applied the evaluation criteria described Otter Tail Power's August 16th filing to a competitive project list and explained the basis for selecting the Solway and Abercrombie Projects. This filing is step three.

pricing relative to the pricing assumptions in the Company's most recent IRP, which serves as an objective benchmark. This process allows Otter Tail Power to identify projects that warrant further discussion and evaluation. Competitive, viable projects where the developer has provided written indicative pricing and supporting information are compiled on a "green sheet", which is continuously updated as some projects drop out, and others are added. Through this process Otter Tail Power developed a final list of eight competitive, viable projects which were evaluated on the following criteria:

1. levelized cost of energy to Otter Tail customers;
2. indication of site commitment;
3. status of generation interconnection;
4. location of interconnection and impact of delivery to Otter Tail customers including potential project curtailment;
5. project permitting status;
6. anticipated commercial operation date to ensure utilization of the tax incentives and be consistent with the resource plan;
7. evidence of resource (resource assessment of wind/solar);
8. developer's experience in developing energy facilities; and
9. other public interest benefits/considerations. [19]

The following Table 7 provides a summary of the competitive proposals evaluated by Otter Tail Power.

Table 7– Competitive Project List Summary

[PROTECTED DATA BEGINS…

…PROTECTED DATA ENDS]

[19] Compliance Filing, August 16, 2024, at p.5.

As described in Otter Tail Power's September 16, 2024 Compliance Filing, the Solway and Abercrombie Projects were selected primarily because their LCOE were by far the lowest among the proposals evaluated. For context, both proposals have a LCOE **[PROTECTED DATA BEGINS…**

…PROTECTED DATA ENDS] In addition to having the lowest LCOE, neither project raised concerns on factors 2-9 of the Company's evaluation criteria. For further context, when compared to the cost of the next most competitive project, the Solway and Abercrombie Projects produce $178 million in savings on a net present value of revenue requirement (NPVRR) basis, as reflected in the following Table 8, which assumes the Projects are allocated to both Minnesota and South Dakota:

Table 8

Estimated Otter Tail Power Selected Project Savings - MN Allocation ($000s)				
	NPVRR		Savings vs. Minimum Unselected Project	
Abercrombie	$	243,820	$	153,681
Solway	$	46,213	$	24,520
Total	**$**	**290,032**	**$**	**178,201**

The favorable LCOE for these projects is based in part on the flexibility of Otter Tail Power's procurement process, which allows Otter Tail Power to adapt to market conditions in component procurement (such as modules, inverters, racking, etc.) and other project inputs. Favorable interconnection costs also drive down the Projects' LCOE. Solway Solar utilizes a surplus interconnection at an existing site, thus limiting the interconnection costs to the substation expansion required alongside the existing site. The Abercrombie Solar Project, although not a surplus interconnection, also has relatively low interconnection costs. Only minimal transmission upgrades are necessary to bring this project online.

Another factor in the Projects favorable LCOE is the manner in which Otter Tail Power engineers, procures, and constructs these projects. Otter Tail Power will not utilize a full engineering, procurement, and construction (EPC) firm to execute the projects' ultimate completion. Within a full EPC "wrap" there are generally cascading margins throughout the projects' life cycle. Instead, Otter Tail Power will limit margins by directly securing major component purchases and directly contracting with installers. Finally, the

last driver for the low-cost project at Solway is land acquisition. Otter Tail Power has acquired the land necessary to build the Solway Solar project, eliminating operational lease payments over the life of the project.

C. Related Benefits

The Projects will protect Otter Tail Power customers from fluctuations in energy market prices. They will be on-peak resources, achieving maximum output during the peak hours of the day and months of the year. By generating during these expensive periods, the Projects will offset some of the most expensive market purchases and save customers money. For nearly all hours that the solar farm is producing, the zero-cost energy of the solar farm will be preferred over the gas-fired CT. As a result, there will be fuel savings and emissions reductions at the Solway interconnection.

The Projects will also significantly reduce carbon emissions. Otter Tail Power estimates that the sum annual generation from the Projects will equal approximately 760,035 MWh. Assuming these projects displace area fossil fuel generation, which has an overall carbon intensity of 2,010.74 pounds of CO2/MWh, the projects will offset approximately 764,116 tons of CO2 annually.

D. Project Risks & Mitigation

Risk of Loss and Limits on Insurance

The Abercrombie and Solway Solar Projects present unique risk and insurance issues which can be managed but not fully mitigated. These issues are not unique to these projects; they are issues faced by all developers and utilities engaged in developing and operating large-scale solar projects. As noted below, the most acute risks are driven by the potential damage from severe convective storms with hail, and the cost and availability of insurance products addressing such risks. While some risks can be mitigated, there is likely a gap created by current insurance market trends that allow for only partial coverage for catastrophic events. In the Company's assessment, the Solway and Abercrombie Projects' are prudent investments notwithstanding these risks because of the projects' highly favorable LCOE, the need for these projects for compliance with Minnesota's CFS, and the fact that the most likely risks can largely be mitigated as noted below. To be clear, however, the Projects' significant benefits come with risks for our customers. In the event of a catastrophic weather event causing significant losses that could not be reasonably insured, Otter Tail would seek recovery for the losses from rate payers.

Otter Tail Power has assessed the risks of the Abercrombie site and the solar projects in general. The most probable significant risk is hail and wind associated with

severe convective storms. To better understand this risk, Otter Tail Power commissioned VDE Americas, Inc. (VDE) to conduct a catastrophic risk assessment focused on severe convective storms. This assessment considered risks of severe hail for the Abercrombie site and the nature of damage and financial losses the Project could suffer under different scenarios, including a 500-year severe hail event. This assessment – a Probable Maximum Loss (PML) analysis, compared the Abercrombie Solar Project in the context of other solar project locations, specifically a higher hail risk area in Texas and a lower hail risk area in California. The assessment also considered how risks were mitigated by project design variables, including the thickness of solar panel glass and the ability of the panels to rotate and tilt in response to severe storm threats.

The VDE assessment demonstrates that the risk of severe hail and wind damage can be largely mitigated by design features that allow the solar panels to (1) rotate so that the panels are facing away from the wind and (2) tilt up to a 75-degree angle. The following table provided in the VDE assessment assumes two-sided panels with a glass thickness of 2.0 millimeters. As shown in the table the PML for the Abercrombie Solar Project (referenced as the Flickertail project) ranges from nearly $100 million to $0 depending on whether the panels can rotate away from the wind and tilt to a stored position at an angle of 75 degrees.

Table A1. P90 500-Year Severe Hail Event PML Values

	PV Module Tilt Angle								
	Facing into Wind					Facing Away from Wind			
Site Location	**0° (Flat)**	**50°**	**60°**	**65°**	**75°**	**50°**	**60°**	**65°**	**75°**
California Reference	$86.07M	$78.66M	$58.33M	$47.12M	$21.44M	$0.67M	$0.00M	$0.00M	$0.00M
Flickertail Solar Project	$97.82M	$97.82M	$97.82M	$97.82M	$69.70M	$34.88M	$3.28M	$0.39M	$0.00M
Texas Reference	$97.82M	$97.82M	$97.82M	$97.82M	$94.94M	$43.18M	$3.07M	$0.32M	$0.00M

The data provided by VDE also demonstrates that panel thickness is a variable in reducing risk of loss. In general terms, the thicker the panel glass the less damage the panel is likely to suffer in a severe hail and wind event. VDE has assessed 2.0 and 3.2 millimeters glass panels. Otter Tail Power is also reviewing the possibility of 4.0 millimeter glass panels, which are not readily available at this time but are expected on the market soon.

Based on the PML assessments done by VDE, Otter Tail Power plans to design the Abercrombie Solar Project to permit the solar panels to rotate away from the wind in convective storms, and to be stowed in a 75-degree tilted position facing away from the wind. The rotation and tilting features will be part of an automated system that will be triggered by warnings and data issued by the National Weather Service. These design

features are accounted for in the Project's cost. Otter Tail Power intends to issue an RFP in the near term for solar panels, where it will seek the best value in terms of pricing, panel glass thickness, and durability. Otter Tail will utilize the same design strategy for the Solway Project.

Otter Tail Power has been evaluating insurance products for Abercrombie and Solway, and a common issue is that utility-scale solar projects typically are subject to a severe convective storm sublimit of insurance coverage ranging from $25 million to $50 million. This appears to be the case regardless of the project site or size of the project. Insurance coverage exceeding this range is not available at commercially feasible costs. Otter Tail Power has confirmed these points with insurance brokers, solar developers, and other utilities. Otter Tail Power has no reason to think this situation will improve in the near or medium term.

In terms of insurance coverage, Otter Tail Power has included $2.5 million for projected insurance premiums in the annual operation and maintenance budget for the Abercrombie Project which is factored into the LCOE. Because solar facilities are subject to a severe convective storm sublimit and the fluidity of the insurance market, we cannot say with precision what level of loss coverage this would secure, but it is reasonable to expect it would fall somewhere within the $25 million to $50 million sublimit range noted above. This sublimit is significantly less than the anticipated cost to replace Abercrombie facilities that suffer significant damage in a severe event. Assuming for analysis that all Abercrombie panels required replacement, that cost could be as much as $150 million. However, based on the VDE analysis and design features Otter Tail Power intends to incorporate into the Abercrombie Project the risk of such an uninsured loss is remote based on the data available to Otter Tail Power.

To be clear, there are other risks for the Abercrombie Solar Project including flooding and tornados. The Abercrombie Solar Project will be constructed on 3,400 acres near the Red River of the North, which is prone to flooding. Otter Tail Power anticipates design features and site construction will address part of this risk. The risk of tornados is extremely difficult to assess. The severe rotational winds associated with these events are not likely mitigated by design features. Otter Tail Power is further assessing these risks. Currently we are unable to provide any probabilities or PML assessments. Suffice to say either a 500-year flood or extreme and well-targeted tornado could result in losses not fully covered by insurance.

The Solway Solar Project faces similar risk and insurance challenges, but the Solway project is substantially smaller than the Abercrombie Project. Otter Tail Power intends to design the Solway Project similar to the Abercrombie Project to mitigate hail and wind risk. The Solway Project's costs assume these design features.

In sum, the Abercrombie and Solway Solar Projects are excellent projects that will provide low-cost, carbon free energy for our customers for decades to come. That said, the favorable costs of these projects come with certain risks for our customers. These risks – especially the hail and wind risk, can be largely mitigated by thoughtful design. Other risks, such as catastrophic flood and tornadic storms, are much more difficult to assess and address.

Other Risks

Otter Tail Power anticipates both projects will be eligible for production tax credits (PTC) as passed in the Inflation Reduction Act (IRA) of 2022. The PTCs are a significant part of the overall economics for both the Solway and Abercrombie Projects. Otter Tail Power has taken steps to preserve PTC eligibility for both projects. This includes efforts to satisfy safe harbor requirements related to the commencement of construction. These efforts focus primarily on transformer acquisitions and related work that aligns with current IRS guidance.

Whether the in-coming Trump administration will seek changes to the IRA or the way PTCs are administered is not known. Currently there is no proposal to repeal the IRA or to eliminate or limit PTCs necessary for the Abercrombie and Solway Projects. That said, it is likely that the new administration's approach to energy policy will differ substantially from than that of the former administration. While congressional action would presumably be necessary for substantial changes to the IRA, the U.S. Treasury Department develops regulations and guidance for tax credits under the IRA. Notably, Treasury Secretary nominee Scott Bassett has been critical of the IRA, and it is possible that the Treasury Department could seek to revise prior guidance or provide new guidance that may impact various provisions of the IRA designed to promote renewable energy.[21] In addition to potential changes to the IRA, the new administration could pursue and implement other policy changes that may affect the Solway and Abercrombie Projects, including various tariffs that may affect the availability and pricing of project components. In sum it is very difficult at this time to predict whether new laws, regulations, or regulatory guidance will alter the economics of the Solway and Abercrombie Projects.

Should there be substantial statutory or regulatory changes affecting the economics of the Solway Project, Otter Tail Power as the developer and project manager would have leeway in assessing the most effective and timely mitigation efforts. With respect to the Abercrombie Project, the APA between Otter Tail Power and Flickertail LLC

[21] See *What Trump's Treasury pick means for clean energy tax credits*, E&E News by Politico, November 25, 2024.

permits the Company to terminate the Abercrombie APA for a sum certain before closing. After the APA closes, Otter Tail would need to assess any post-closing statutory or regulatory changes to determine the most effective and timely mitigation measures.

Finally, contract and counterparty risks associated with suppliers, vendors, and on-site contractors will be addressed through use of prudent contracting terms Otter Tail Power has applied in other large projects.

VIII. CONCLUSION

Based on the foregoing, Otter Tail Power respectfully requests the Commission:

a. approve Otter Tail Power's investment in the Projects;
b. determine that the Projects qualify for application toward Otter Tail Power's EETS and CFS obligations; and
c. authorize future cost recovery of the Projects through the RRCR Rider, subject to Commission review and approval of specific costs to be presented by Otter Tail Power in a future petition under Minn. Stat. § 216B.1645, subd. 2a.

Dated: December 9, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ DEREK HAUGEN
Derek Haugen
Rates Analyst
Regulatory Economics
Otter Tail Power Company
215 S. Cascade Street
P.O. Box 496
Fergus Falls, MN 56537
(218) 739-8444
dhaugen@otpco.com

By: /s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
P.O. Box 496
Fergus Falls, MN 56537
(218) 739-8956
cstephenson@otpco.com

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Solway and Abercrombie Solar Projects
Docket No. E017/M-24-

I, Stacy Wahlund, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

Otter Tail Power Company
Initial Filing

Dated this **9th** day of **December, 2024**.

/s/ STACY WAHLUND
Stacy Wahlund
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8338

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

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
11	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects
12	Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects
13	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects
14	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects
15	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects
16	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	Otter Tail Power Company Solway and Abercrombie Solar Projects