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July 17, 2024

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

**RE: In the Matter of Otter Tail Power Company's Annual Filing of the
Demand Side Management Financial Incentive Project and to Update the
Conservation Improvement Project Rider
Docket No. E017/M-24-49
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail or the Company) submits these Reply Comments in response to July 2, 2024, Comments by the Minnesota Department of Commerce, Division of Energy Resources (Department). Otter Tail agrees with the Department's recommendation to approve Otter Tail's Petition in this docket and respectfully requests the Minnesota Public Utilities Commission (MPUC) approve the items requested in its Petition as follows:

1. Approve a Demand Side Management (DSM) financial incentive of \$2,705,283;
2. Approve proposed recoveries and expenditures in the Company's CIP tracker account during 2023 resulting in a year-end 2023 balance of (\$3,321,343);
3. Approve a 2023/2024 Conservation Cost Recovery Adjustment (CCRS) of \$0.00555 per kWh, to be effective October 1, 2024, or the first months after Commission approval, as well as the individual class rate factors, should the Commission deem this approval necessary;
4. Grant Otter Tail a variance to Minnesota Rules part 7820.3500 (K) for one year after the issue date of the Commission's Order in the present docket;
5. Approve Otter Tail's proposed changes to its tariff sheets; and
6. Require Otter Tail to submit a compliance filing, within 10 days of the issue date of the Order in the present docket, with revised tariff sheets reflecting the Commission's determinations in this matter.

Mr. Seuffert
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We have electronically filed this document with the Department and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at 218-739-8240 or czuniga@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ CRISTINA ZUNIGA
Cristina Zuniga
Supervisor, DSM Administration

sjw
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

RE: In the Matter of Otter Tail Power Company's Annual Filing of the Demand Side Management Financial Incentive Project and Annual Filing to Update the Conservation Improvement Project Rider Docket No. E017/M-24-49

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
Reply Comments**

Dated this **17th** day of **July, 2024**.

/s/ STACY WAHLUND
Stacy Wahlund
Regulatory Filing Coordinator
Otter Tail Power Company
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