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October 20, 2025



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

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the
Distributed Solar Energy Standard Projects
Docket No. E017/M-25-338
Reply Comments**

Dear Ms. Bergman:

Otter Tail Power Company (OTP or Company) offers these Reply Comments in response to Comments of (1) the Minnesota Department of Commerce (Department) and (2) the Minnesota Solar Energy Industries Association (MnSEIA) and Coalition for Community Solar Access (CCSA) (collectively the Solar Parties)

The Company supports and agrees with the Department's analysis and recommendations, including the Department's comprehensive reporting recommendations.

The Company appreciates the Solar Parties' support for the Parkers Prairie and Pelican Rapids projects as described in their joint Comments. With respect to the Solar Parties' recommendation concerning paired battery energy storage systems 'use cases' in future filings, the Company notes that the Distributed Solar Energy Standard (DSES) has no compliance requirement for paired battery energy storage systems.

In the present matter, the Company included in its scoring matrix a five-point adder for the reliability benefits provided by paired battery energy storage systems. The Company evaluated two projects that included the option for adding battery energy storage systems. The incremental costs associated with the battery storage addition outweighed the reliability benefits in the scoring matrix, and as a result the paired battery storage system projects were not selected.

The Company respectfully requests the Commission to approve the Company's Petition for Approval of the Distributed Solar Energy Standard Projects.

Please contact me at 218-739-8956 or at cstephenson@otpc.com, if you have any questions regarding this filing

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

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Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval
of the Distributed Solar Energy Standard Projects
Docket No. E017/M-25-338**

I, Khris Ekstrom, hereby certify that I have this day served a copy of the following, or a summary thereof, on Sasha Bergman 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 **20th** day of **October, 2025**.

/s/ KHRIS EKSTROM
Khris Ekstrom
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8334

#	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	Official 25-338
2	Nick	Bowman	nick@communitysolaraccess.org	CCSA		1380 Monroe Street NW #721 Washington DC, 20010 United States	Electronic Service		No	Official 25-338
3	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	Official 25-338
4	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	Official 25-338
5	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	Official 25-338
6	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	Official 25-338
7	Paula	Foster	pfoster@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-338
8	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-338
9	Amber	Grenier	agrenier@otpco.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-338
10	Derek	Haugen	dhaugen@otpco.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	Official 25-338
11	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	Official 25-338
12	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	Official 25-338
13	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-338

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
14	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	Official 25-338
15	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	Official 25-338
16	Logan	O'Grady	logrady@mnseia.org	Minnesota Solar Energy Industries Association		2288 University Ave W St. Paul MN, 55114 United States	Electronic Service		No	Official 25-338
17	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-338
18	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	Official 25-338
19	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	Official 25-338
20	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	Official 25-338
21	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	Official 25-338