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July 24, 2020

Will Seuffert
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 Annual Forecasted Rates for its Energy Adjustment Rider,
Rate Schedule Section 13.01
Docket No. E017/AA-20-462**

**In the Matter of an Investigation into the Appropriateness of Electric Energy Cost
Adjustments
E-999/CI-03-802**

EXTENSION REQUEST

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby requests an extension to file its Reply Comments in our Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01 Docket No. E017/AA-20-462. Otter Tail will file its Reply Comments on or before August 28, 2020. As noted below, we will do all we can to submit these Reply Comments much sooner than that.

Under the timeline established in Docket E-999/CI-03-802, Otter Tail is currently scheduled to file Reply Comments to the Initial Comments submitted by the Department of Commerce, Division of Energy Resources (Department) by July 31, 2020. In those Initial Comments, the Department recommended approval of the proposed rates submitted May 1, 2020.

Due to a changes to original input assumptions to the initial forecasted rates included in Otter Tail's May 1, 2020 filing, some related to the unprecedented on-going COVID-19 pandemic, as well as others related to changes in plant operations, Otter Tail is currently working on an update to its 2021 Forecasted rates to be included with its Reply Comments.

In order to complete this update and allow for adequate review and submission of the filing, including updated supporting schedules and information request responses to provide the Department requested information necessary to facilitate their review, Otter Tail respectfully requests a similar extension as requested by Minnesota Power in their respective Fuel Adjustment Clause Docket.

Otter Tail is sensitive to the tight schedule for obtaining approval of the 2021 rates in a timely manner and will file its Reply Comments as quickly as possible to allow the Department as much time as possible to complete its review of the updated rates and keep as close to the original schedule as possible.

Otter Tail notes that Minnesota Power's extension request¹ is on the agenda for the Minnesota Public Utilities Commission's (Commission) July 30, 2020 agenda meeting. Otter Tail seeks a similar determination in that proceeding, which can be facilitated by Decision Option 4 as written in the Commission Staff's Briefing Papers filed July 22, 2020.

As an alternative, Otter Tail would support Decision Options 2 and 3 amended to include Otter Tail. Otter Tail anticipates being able to provide a better estimate as to when Reply Comments would be filed at the July 30 Commission meeting.

We are available to provide any additional information or respond to any questions you may have. If you have any questions regarding this filing, please contact me at 218-739-8279 or at stommerdahl@otpc.com.

Sincerely,

/s/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Administration

kaw
Enclosures
By electronic filing
c: Service List

¹ In the Matter of Minnesota Power's Petition for Approval of the Annual Forecasted Rates for its Rider for Fuel and Purchased Energy Charge, Extension request filed by Minnesota Power on July 10, 2020.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for
Approval of the Annual Forecasted Rates for its Energy Adjustment Rider,
Rate Schedule Section 13.01
Docket No. E017/AA-20-462**

**In the Matter of an Investigation into the Appropriateness of Electric Energy Cost
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E-999/CI-03-802**

I, Kim Ward, 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
EXTENSION REQUEST**

Dated this **24th** day of **July, 2020**.

/s/ Kim Ward _____
Kim Ward, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8268

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_20-462_AA-20-462
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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-462_AA-20-462
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_20-462_AA-20-462
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_3-802_1
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