

June 30, 2025

PUBLIC DOCUMENT

Will Seuffert
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/AA-25-65

Dear Mr. Seuffert:

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

Otter Tail Power Company's Petition for Approval of the Annual Forecasted Rates for its Energy Adjustment Rider, Rate Schedule Section 13.01.

The Petition was filed by Otter Tail Power Company on May 1, 2025.

The Department recommends the Company provide additional information in reply comments prior to the Department making its final recommendation and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Dr. Sydnie Lieb
Assistant Commissioner of Regulatory Analysis

LB/MJ/ad
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/AA-25-65

I. INTRODUCTION

On May 1, 2025, Otter Tail Power Company (Otter Tail or the Company) filed its 2026 Energy Adjustment Rider (EAR) forecast report (Petition) pursuant to the Minnesota Public Utilities Commission's (Commission's) June 12, 2019, Order in Docket No. E999/CI-03-802 and the applicable reporting requirements in the rules governing the automatic adjustment of charges, Minnesota Rules 7825.2800 to 7825.2840. Otter Tail requests the Commission accept the Company's filing as being in compliance with the applicable reporting requirements and approve the Company's proposed 2026 system energy cost forecast along with the corresponding forecasted EAR rates for each customer class.

II. DEPARTMENT ANALYSIS

The Minnesota Department of Commerce Division of Energy Resources (Department) reviewed Otter Tail's Petition to determine (1) whether the Company's forecasted 2026 Minnesota (OTP MN) jurisdictional cost of \$77.084 million with a resulting average rate of \$0.02794 per kWh¹ (\$27.94/MWh) and the corresponding monthly EAR customer class rates are reasonable; and (2) whether the Petition included the applicable reporting requirements.

A. *BACKGROUND SUMMARY ON OTTER TAIL'S FUEL CLAUSE ADJUSTMENT IN RECENT YEARS*

Minnesota Statutes § 216B.16, subd. 7, authorizes the Commission to allow a public utility to automatically adjust charges for the cost of fuel. Prior to 2020, utilities would (1) adjust their Fuel Cost Adjustment (FCA) rates monthly to reflect on a per kWh basis, deviations from the base cost of energy established in the utility's most recent general rate case; and (2) file monthly and annual reports to be reviewed for accuracy and prudence.

In 2003, the Commission initiated an investigation (Docket No. E999/CI-03-802) to explore possible changes to the FCA and invited stakeholders to comment on the FCA's purpose, structure, rationale, and relevance. The Commission's December 19, 2017, Order in Docket No. E999/CI-03-802 approved certain reforms to the FCA mechanism. Specifically, Point 1 of the December 19, 2017, Order approved the Department's FCA reform proposals as follows:

- The Commission will set recovery of the utility's fuel, power purchase agreements, and other related costs (fuel rates) in a rate case or an annual fuel clause adjustment filing unless a utility can show a significant unforeseen impact.

¹ Petition at 1.

- Each electric utility will publish the monthly fuel rates in advance of each year to give customers notice of the next year's monthly electric fuel rates.
- The monthly fuel clause adjustment will not operate – each electric utility will charge an approved monthly rate.
- Utilities will be allowed to track any changes in \$/MWh fuel costs that occur over the year and there will be no carrying charge on the tracker.
- Annually, each electric utility will report actual \$/MWh fuel costs in each month by fuel type (including identification of costs from specific power purchase agreements) and compare the annual revenue based on the fuel rates set by the Commission with annual revenues based on actual costs for the year.
- Each electric utility will refund any over-collections and show prudence of costs before allowing recovery of under-collections. If annual revenues collected (\$/MWh) are higher than total actual costs, the utility must refund the over-collection through a true-up mechanism. If annual revenues collected are lower than total actual costs, the utility must show why it is reasonable to charge the higher costs (under-collections) to ratepayers through a true-up mechanism.

In addition, Point 2 of the Commission's December 19, 2017, Order in Docket No. E999/CI-03-802 requires the following:

Each utility must file proposed fuel rates outside of a general rate case. If the proposed fuel rates are different from the rates set in a utility's most recent miscellaneous rate docket that coincides with a rate case, the utility must fully explain the basis for any difference. These filings should include complete documentation supporting the proposed fuel rates, including each PPA, estimates of costs for each type of fuel, and the proportion of each type of fuel, along with a complete description of any model used to develop the proposed \$/MWh fuel rates, including but not limited to the identification and justification of the inputs and formulas used for all fuel types, and fully documented sales forecasts.

The Commission's December 12, 2018, Order in Docket No. E999/CI-03-802 modified certain aspects of and added to the FCA reform previously approved in the Commission's December 19, 2017, Order in the same docket. In particular, the December 12, 2018, Order:

- Established a January 1, 2020, implementation date for the FCA reform.
- Required the utilities, following the implementation of the FCA reform, to file an annual true-up by March 1 of each year.
- Discontinued the requirement for utilities to submit monthly automatic adjustment filings.
- Granted the relevant utilities a variance to Minnesota Rule 7825.2600, Subp. 3, which requires that the FCA be applied to base recovery of fuel costs on a monthly basis. Under the new FCA process, the monthly FCA would be irrelevant, because, instead, the Commission would use an annual forecast of fuel costs to adjust base fuel rates annually.

The Commission's June 12, 2019, Order in Docket No. E999/CI-03-802 provided additional details to finalize the FCA reform. Specifically, the June 12, 2019, Order approved, among other things:

- Variances to Minnesota Rules 7825.2800 through 7825.2840 to accommodate the new FCA process by modifying the filing deadlines contained in these rules.
- A procedural schedule, as shown in Appendix A of the Order.
- A threshold of plus or minus 5% of all FCA costs and revenues to determine whether an event qualifies as a significant, unforeseen impact that may justify an adjustment to the approved fuel rates. Utilities are permitted to implement revised rates following a 30-day notice period, subject to a full refund, if no party objects to the revised rates.
- Tracking under- or over-recovered FCA costs as regulatory assets or liabilities, respectively, using FERC Account 182.3.
- Information requirements for the annual forecast and true-up filings for all electric utilities, including the reporting requirement changes outlined in Attachments 1, 2, and 3 of the March 1, 2019, joint comments² in Docket No. E999/CI-03-802.
- Tariff changes reflected in Attachments 4, 5, and 6 of the March 1, 2019, joint comments³ in Docket No. E999/CI-03-802.
- Discontinuation of Otter Tail's reporting of Part D, Section 5 (MISO Day 1); Part E, Section 10, Attachment G (UCAP); Part H, Section 6, Attachments N and O (generation deliverability and IRP-related); and Part H, Section 8 (transformers).

On May 1, 2019, in Docket No. E017/AA-19-297, Otter Tail filed its initial petition requesting approval of its 2020 FCA/EAR forecast. Subsequently, in reply comments filed July 31, 2019, in the same docket, Otter Tail revised its forecasted 2020 system fuel/purchased power costs to \$129,421,381, an estimate which reduced the forecasted average fuel/purchased power cost per MWh from \$25.777⁴ to \$25.719⁵ for 2020. The Commission approved Otter Tail's 2020 forecast, as revised in the Company's July 31, 2019, reply comments, in its December 18, 2019, Order in Docket No. E017/AA-19-297.⁶

Pursuant to the Commission's June 12, 2019, Order in Docket No. E999/CI-03-802, on January 30, 2020, Otter Tail filed a compliance report in Docket No. E017/M-03-30 with the required July 1, 2018 - December 31, 2019, FCA/EAR true-up. In its May 22, 2020, Order in Docket No. E017/M-03-30, the Commission approved the Company's compliance report and annual true-up credit of \$0.0005 per kWh, which Otter Tail applied to the monthly rates it charged to customers for sales subject to FCA/EAR during the period of March 1, 2020 - February 28, 2021.

On May 14, 2020, in Docket No. E017/AA-19-297, Otter Tail submitted a filing requesting approval to reduce its fuel cost charges to customers for the period of July – September 2020. In its July 13, 2020, Order in the same docket, the Commission approved the Company's proposed \$3,676,903 refund to customers, thereby reducing Otter Tail's July – September 2020 EAR rates by \$0.0057 per kWh. On

² Docket No. E999/CI-03-802, March 1, 2019, joint comments, Attachment 2.

³ Docket No. E999/CI-03-802, March 1, 2019, joint comments, Attachment 5.

⁴ Docket No. E017/AA-19-297, May 1, 2019, Initial Filing, Table 2.

⁵ Docket No. E017/AA-19-297, July 31, 2019, Initial Filing, Table 1.

⁶ Docket No. E017/AA-19-297, July 31, 2019, reply comments, Revised Attachment 2 and Revised Attachment 1, Otter Tail's Commission-approved 2020 forecasted FCA costs and corresponding monthly EAR rates.

October 12, 2020, in Docket No. E017/AA-19-297, Otter Tail requested approval to refund an additional \$8,383,674⁷ to account for the Company's FCA/EAR over-collections between April and September 2020. The Commission's November 16, 2020, Order approved the \$8,383,674 refund, reducing the Company's January to June 2021 EAR/FCA rates by \$0.0061 per kWh.

On May 1, 2020, in Docket No. E017/AA-20-462, Otter Tail filed its initial petition requesting approval of its 2021 FCA/EAR forecast. On August 14, 2020, Otter Tail filed reply comments revising the Company's forecasted 2021 system fuel/purchased power costs to \$102,058,949, an estimate which reduced the forecasted average fuel/purchased power cost per MWh from \$20.998 to \$20.891 for 2021.⁸ The Commission approved Otter Tail's 2021 forecast, as revised in the Company's August 14, 2020, reply comments, in its December 31, 2020, Order in Docket No. E017/AA-20-462.⁹

On February 26, 2021, Otter Tail filed its 2020 FCA/EAR true-up in Docket No. E017/AA-19-297. The Company's 2020 true-up filing requested Commission approval to refund customers \$1,246,144 in overcollections. On June 30, 2021, the Commission issued an order accepting and approving the Company's 2020 true-up, with modifications.

On May 3, 2021, in Docket No. E017/AA-21-311, Otter Tail filed its initial petition requesting approval of its 2022 FCA/EAR forecast. The Company's forecasted 2022 system fuel/purchased power costs were \$104,111,271, an estimate which reduced the forecasted average fuel/purchased power cost per MWh to \$20.783 for 2022. The Commission approved Otter Tail's 2022 forecast in its December 2, 2021, Order in Docket No. E017/AA-21-311.

On March 1, 2022, Otter Tail filed its 2021 FCA/EAR true-up in Docket No. E017/AA-20-462. The Company's 2021 true-up filing requested Commission approval to collect \$700,126 in under collections over a four-month period. The Department made a recommendation to the Commission for approval, and on July 5, 2022, the Commission issued an order accepting and approving Otter Tail's energy adjustment rider true-up compliance filing as requested.

On May 2, 2022, in Docket No. E017/AA-22-214, Otter Tail filed its initial petition requesting approval of its 2023 FCA/EAR forecast. On June 30, 2022, the Department filed comments recommending approval of the Company's forecasted rates and requesting additional information regarding planning resource auction (PRA) revenues in reply comments. On December 29, 2022, the Commission issued an order requiring Otter Tail to reduce its 2023 FCA forecast fuel costs by \$3.89 million to reflect credits for PRA revenues, to \$146,968,503 for an MWH cost of \$26.188.

On February 28, 2023, Otter Tail filed its 2022 FCA/EAR true-up in Docket No. E017/AA-21-311. The Company's 2022 true-up filing requested Commission approval to recover \$9,411,883 in under collections. The Department made a recommendation to the Commission for approval, and on June 30,

⁷ Docket No. E017/AA-19-297, October 12, 2020, filing, Attachment 1.

⁸ Docket No. E017/AA-20-462, August 14, 2020, Table 1.

⁹ Docket No. E017/AA-20-462, August 14, 2014, reply comments, Revised Attachment 2 and Revised Attachment 1, Otter Tail's Commission-approved 2021 forecasted FCA costs and corresponding monthly EAR rates.

2023, the Commission issued an order accepting and approving Otter Tail's energy adjustment rider true-up compliance filing as requested.

On May 1, 2023, in Docket No. E017/AA-23-181, Otter Tail filed its initial petition requesting approval of its 2024 FCA/EAR forecast. The Company's forecasted 2024 system fuel/purchased power costs were \$150,076,693, an estimate which reduced the forecasted average fuel/purchased power cost per MWh to \$26.099 for 2024. The Commission approved Otter Tail's 2024 forecast in its November 9, 2023, Order in Docket No. E017/AA-23-181.

On March 1, 2024, Otter Tail filed its 2023 FCA/EAR true-up in Docket No. E017/AA-22-214. The Company's 2023 true-up filing requested Commission approval to refund \$5,201,983 in over collections. On April 15, 2024, the Department filed comments recommending approval of Otter Tail's FCA/EAR true-up. The petition was approved by the Commission at its June 27, 2024, agenda meeting.

On May 30, 2024, Otter Tail filed a Supplemental Filing in Docket No. E017/AA-23-181 requesting to refund customers \$12 million due to over-collections from January 2024 to April 2024. Ordering Point 3 of the Commission's June 12, 2019, Order in Docket No. E999/CI-03-802 allows an adjustment to approved fuel rates subject to a threshold of plus or minus 5 percent of all FCA costs and revenues. Revised rates may be implemented following a 30-day notice period if no party objects to the revised rates. Due to no objections from related parties, an EAR rate reduction of \$0.009120 per kWh was implemented from July 2024 to December 2024.

On May 1, 2024, in Docket No. E017/AA-24-65, Otter Tail filed its initial petition requesting approval of its 2025 FCA/EAR forecast. The Company's forecasted 2025 system fuel/purchased power costs were \$140,775,339, an estimate which reduced the forecasted average fuel/purchased power cost per MWh to \$23.92 for 2025. The Commission approved the forecast on October 31, 2024.

On November 22, 2024, Otter Tail filed a Supplemental Filing in Docket No. E017/AA-23-181 requesting to refund customers \$9,918,887 million due to over-collections from May 2024 to October 2024. Ordering Point 3 of the Commission's June 12, 2019, Order in Docket No. E999/CI-03-802 allows an adjustment to approved fuel rates subject to a threshold of plus or minus 5 percent of all FCA costs and revenues. Revised rates may be implemented following a 30-day notice period if no party objects to the revised rates. Due to no objections from related parties, an EAR rate reduction of \$0.007200 per kWh will be implemented from January 2025 through June 2025.¹⁰

On February 28, 2025, Otter Tail filed its 2024 FCA/EAR true-up in Docket No. E017/AA-23-181. The Company's 2024 true-up filing requested Commission approval to recover \$774,941 in under collections and true-up charge of \$0.00030 per kWh over a 12-month period from September 1, 2025, through August 31, 2026. The Department made a recommendation to the Commission for approval, on April 14, 2025, which was approved at the June 26, 2025, Commission agenda.

The current Petition provides the forecasted energy costs and the associated proposed rates recoverable through the EAR for 2026, as required under the modified FCA process currently in place.

¹⁰ Docket No. E017/AA-23-181, Supplemental Filing, November 22, 2024, at 1.

B. ANNUAL COMPLIANCE AND REPORTING REQUIREMENTS

In Order Point 7 of its June 12, 2019, Order in Docket No. E999/CI-03-802, the Commission approved the annual FCA forecast and true-up reporting compliance matrix specific to Otter Tail, as shown in Attachment 2 of the March 1, 2019, Joint Comments in the same docket. The Department verified the Company provided the required information, as summarized in the following table:

Table 1: Compliance Reporting for Otter Tail’s Fuel Clause Adjustment Forecast

Reporting Requirement	Petition Reference Where Otter Tail Provided the Required Information
Compliance Matrix in Attachment 2 of the March 1, 2019, joint comments in Docket No. E999/CI-03-802¹¹	
Lines 1-4, Policies and Actions (Minnesota Rule 7825.2800)	Appendix A, Section 1.1-1.3
Line 9, Base Cost of Fuel	Appendix A, Section 2
Line 15, Total Cost of Fuel Delivered to Customers	Appendix A, Section 2.1
Line 26, Passing MISO Day 2 Costs through the FCA	Appendix A, Section 3
Line 29, MISO Day 2 Charges	Attachment 4.1 and 4.3
Line 32, SPP Energy Costs	Appendix A, Section 4
Line 33, SPP Energy Costs	Attachment 4.2
Line 37, Annual Five-Year Projection (Minnesota Rule 7825.2830)	Attachment 11
Line 39, Annual Notice of Reports Availability (Minnesota Rule 7825.2840)	Appendix B
Line 44, Use of Virtual Transactions for Retail	Appendix A, Section 5
Line 56, Plant Outage Reporting	Petition, pages 12-14
Line 56, Lessons Learned	Appendix A, Section 6, the Company stated, “Otter Tail believes any discussion with regard to lessons learned and information sharing around plant outages is better suited for the true-up filing as opposed to this forecast filing.”
Line 56, Congestion and Firm Transmission Rights	Appendix A, Section 6, and Attachments 4.1 and 4.2
December 18, 2019, Order in Docket No. E017/AA-19-297	
Otter Tail shall identify any and all variables for which Otter Tail’s Strategist run outcome would be inconsistent with the historical data of the variable and describe and justify any and all steps used to address the inconsistency issue(s).	Petition, page 25-26

¹¹ The line numbers in Table 1 refer to the line numbers in the Commission-approved matrix of reporting requirements for Otter Tail’s FCA forecast report.

Otter Tail shall provide as public data the historical system sales and their breakdown by customer class, except for classes for which private customer usage could be derived	Petition, page 27, and Attachment 6a
Otter Tail shall provide as public data the total historical net system FCA costs, including their breakdown by major components.	Petition, page 27, and Attachments 2-3
Otter Tail shall update its 2010 internal line losses study and incorporate that information into the 2021 Forecast	On Petition page 27 Otter Tail stated “This compliance obligation was satisfied in the 2021 MN FCA Forecast Filing, which was approved by the December 2020 Order. Otter Tail updated its line losses study and incorporated the results into the 2021 MN FCA Forecast. The updated parameters have been included in subsequent FCA Forecasts.”
March 12, 2024, Order in Docket No. E999/CI-03-802	
In their future Fuel Clause Adjustment filings, the utility shall incorporate- a. Answers to recurring information requests, including the most recent three-year average of actual annual data compared to the forecast for the FCA calculation components, generation costs, purchase costs, inter-system sales and outages; and b. A comparison of the actual winter energy purchase amounts to the forecast amounts, with an explanation of a variance of five percent or greater.	Petition, pages 27-29 and Attachments 12 and 13 Petition, pages 27-29 and Attachments 12 and 13

Based on our review, the Department recommends the Commission accept Otter Tail’s Petition as complying with the FCA/EAR forecast reporting requirements.

C. OTTER TAIL’S PROPOSED CALCULATION OF THE 2026 ENERGY ADJUSTMENT CHARGES

Pursuant to the Commission’s Order dated July 22, 2024, in Docket No. E017/RP-21-339, Otter Tail stated that its forecasted rates are calculated on a Minnesota jurisdictional basis. Otter Tail stated that this approach differs from prior EAR rates, which the Company had developed to reflect the planned conversion of Coyote Station (Coyote) to Available Maximum Emergency (AME) status beginning in June 2026.¹² The Department has included Otter Tail’s February 26, 2025 presentation that explains changes to Minnesota’s FCA/EAR in light of the changes approved in the Commission’s July 22, 2024 Order.¹³ Otter Tail stated the following regarding its FCA forecast and updated approach:¹⁴

Otter Tail Power begins its EAR forecasting process by developing the system sales forecast, which includes the sales forecasts of four municipal

¹² Petition, page 1.

¹³ See Department Attachment 1 showing OTP slides 1-6. Per OTP’s request does not include slides 7-10.

¹⁴ Petition, page 7.

communities to which Otter Tail Power delivers energy. The Company then uses sales forecast data, along with forward energy and fuel pricing forecasts, to develop the generation and fuel costs forecast. The generation and fuel costs forecast includes baseload steam generation and associated reagents, internal combustion generation, wind generation, solar generation, hydro generation, purchased power, and asset-based sales. After developing the generation and fuel costs forecast, Otter Tail Power develops the non-energy wholesale market charges, wind curtailment, steam and water sales, and Hoot Lake Solar generation credit forecasts. The Company then uses data from the above listed forecasts to calculate the monthly cost per kilowatt-hour (kWh) forecast. Calculations of the monthly cost per kWh are shown in Attachment 2.

Once Otter Tail Power completes the system forecast, the Company removes non-Minnesota costs and revenues from the system forecast. Non-Minnesota costs and revenues refer to certain system costs that the Commission has determined will not be borne by Minnesota customers, such as Coyote variable costs beginning in June of 2026. The Company then allocates the remaining system costs based on Minnesota's proportion of monthly forecast kWh sales for each month, as shown in Attachment 6. After calculating the Minnesota allocation of shared costs and revenues, the Company then adds Minnesota-specific costs and revenues to the allocated shared costs and revenues. Minnesota-specific costs and revenues are those costs and revenues that the Commission has determined will be borne by Minnesota customers alone, and not shared system-wide, such as Hoot Lake Solar. Finally, Otter Tail Power applies the Minnesota total costs and revenues to the respective monthly Minnesota sales forecast to calculate the monthly EAR rate for Minnesota.

The Department reviewed the Commission's July 22, 2024, Order in Docket No. E017/RP-21-339 and the Company's corresponding updated methodology. In addition, the Department reviewed Otter Tail's proposed changes to its Energy Adjustment Rider Rate Schedule, Section 13.01 to reflect the updated methodology.¹⁵ Based on our review, the Department concludes that Otter Tail's updated methodology complies with the Commission's July 22, 2024, Order and recommends approval of the proposed changes to Otter Tail's Energy Adjustment Rider Rate Schedule, Section 13.01.

The following list describes certain terms relevant to Otter Tail's current proposals:

- Energy Adjustment Rider (EAR): The tariff governing the rates for changes in fuel costs charged to Otter Tail's ratepayers; the EAR calculates the overall change in fuel costs from the amounts set in base rates.

¹⁵ Petition, Attachment 9a.

- Energy Adjustment Factor Ratio (EAF Ratio): Estimate of each customer class's characteristic use of energy and resulting contribution to Otter Tail's overall energy costs.
- Energy Adjustment Factor (EAF): The fuel rate Otter Tail charges, per kWh, to ratepayers, based on the EAR and EAF Ratio.
- Energy Adjustment Charge (EAC): The total fuel adjustment charge (EAF times each customer's kWh use).

D. OVERVIEW OF OTTER TAIL'S FORECAST PROCESS

It is the Company's responsibility to properly identify and forecast all charges it intends to recover through the FCA. Absent this responsibility, utilities would have little incentive to accurately forecast all FCA costs they intend to recover, which could limit the benefits of the forecast and true-up processes. Poorly supported FCA forecast and/or true-up filings will likely lead to delays in the regulatory process.

The 2026 forecasted rates are computed on a Minnesota (OTP MN) jurisdictional basis. The Company's method differs from past FCA/EAR rates that the Company developed to accommodate Coyote Station (Coyote) conversion to AME status beginning in June of 2026.¹⁶

The following table summarizes the Company's 2026 Minnesota forecast components, including the MWh system sales subject to the EAR and net system costs recoverable through the EAR.

Table 2: Otter Tail's 2026 Forecasted Minnesota Sales, Cost and Average Cost¹⁷

Minnesota Sales (MWh)	Minnesota Cost (\$)	Average (\$/MWh)
2,758,657	\$ 77,084,271	27.94

The above table shows Otter Tail's 2026 Minnesota EAR average cost of \$27.94 per MWh, and the below table shows Otter Tail's 2022 to 2024 actuals and three-year average of \$24.22 per MWh and its 2025 forecast of \$23.92. The Department notes 2026 forecasted costs are slightly higher than 2022 to 2024 three-year average and 2025 forecast, but not unexpected due to the effective June 1, 2026, changes when Minnesota's portion of Coyote Plant will be limited to AME status. The Department notes that Solway Solar (50 MW) and Abercrombie Solar (295 MW) are expected to be online the end of 2026 and end of 2028, respectfully, which should put downward pressure on EAR rates in 2027 and 2029.

¹⁶ Docket No. E017/RP-21-339, Order Dated July 22nd, 2024.

¹⁷ Petition at 5, Table 2 and Attachment 2

Table 3: Otter Tail's Historical and Forecasted EAR/FCA Average Minnesota Costs (\$/MWh)¹⁸

Calendar Year	Minnesota Average Cost (\$/MWh)
2022	\$25.89
2023	\$20.75
2024	\$26.01
2022 to 2024 three-year average	\$24.22
2025Forecasted	23.92

D.1. Otter Tail's 2026 Forecast of System Sales (MWh)

Petition Attachment 6 provides a breakdown by month, state, and customer class of the 2026 forecasted 5,849,021 MWh in system sales subject to the EAR. Otter Tail provided a sales forecast description explaining the modeling and inputs the Company used to develop the 2026 sales forecast.¹⁹

Otter Tail's 2026 Minnesota sales and Cost forecast is based on Minnesota jurisdictional sales and purchased power costs for January 2026 through December 2026. For comparison purposes, the system total has also been calculated and presented in Table 3 to enable a consistent year-over-year analysis.

Table 4 shows that Otter Tail's 2026 system sales forecast is similar to the 2025 forecast but higher than the actual system sales in 2024. The projected increase for 2026 is largely due to increased large commercial/pipeline increased sales in North Dakota.²⁰

Table 4: Otter Tail's Historical and Forecasted System Sales Subject to the Fuel Clause²¹

Year	System Sales (MWh)
2015	4,600,009
2016	4,726,433
2017	4,787,858
2018	4,969,986
2019	4,999,522
2020	4,782,786
2021	4,772,031
2022	5,575,424

¹⁸ OTP Attachment 2 of past EAR True-Up compliance reports.

¹⁹ Petition, Attachment 6.a.

²⁰ Petition, Attachment 6a, page 13.

²¹ Petition at 7.

2023	5,818,926
2024	5,658,135
2025 Forecast	5,885,378
2026 Forecast	5,849,021

Based on our high-level review of Otter Tail's sales forecasting approach and the simple trend analysis shown above, and the fact that overall, 2026 forecasted sales are higher than 2024 actuals, the Department concludes the Company's forecasted 2026 system sales appear reasonable. The Department recommends the Commission approve Otter Tail's forecasted 2026 system sales for the purpose of setting initial 2026 EAR rates in this proceeding, subject to the subsequent true-up.

For the Minnesota Jurisdictional sales forecast (which is approximately 47.4% of the systems sales) Otter Tail provides a 2,758,656,715 kWh or 2,758,657 MWh on Attachment 2 of the Petition which was used to calculate the EAR 2026 forecasted rate, however, Attachment 6 shows 2,769,788,843 kWh or 2,769,789 MWh. The Department recommends the Company explain in reply comments the difference between these two sales forecasts, and why the higher Minnesota sales forecasts on Attachment 6 is not used for the calculating the Minnesota 2026 forecasted EAR rates.

D 2. Otter Tail's 2026 Forecast of EAR Costs

Consistent with its 2025 FCA/EAR forecast, Otter Tail used the EnCompass software to estimate the economic dispatch²² of available resources to meet its 2026 energy requirements and provided the following description of the EnCompass model:

Otter Tail uses EnCompass (resource planning modeling software) to perform the majority of the generation fuel, purchased power, and asset-based sales forecasting. EnCompass performs full year, 8,760²³ hourly modeling with features such as operating parameters for generating units and uses the sales forecast ... as the basis to determine the energy requirements for Otter Tail's system.

The EnCompass model performs an economic dispatch of available resources to meet the energy requirements, taking into account operational specifications and performance parameters of existing thermal resources (heat rates, maintenance schedules, forced outage rates, minimum/maximum capabilities), hydro units, owned wind and solar, and power purchase agreements. Price forecasts for oil, coal, and natural gas, as well as forecasted locational marginal prices (LMPs) for the

²² The Energy Policy Act of 2005 defines 'economic dispatch' as "the operations of generation facilities to produce energy at the lowest cost to reliably serve customers, recognizing any operational limits of generation and transmission facilities."

Source: [ECONOMIC DISPATCH](#)

²³ 24 hours per day by 365 days per year.

Otter Tail load zone (OTP.OTP) are used as key inputs into EnCompass. There are also 'shapes' or 'profiles' for retail sales, energy prices, and renewable generation used in EnCompass that determine retail sales and economic dispatch.²⁴

Attachment 2 of the Petition provides a summary of the 2026 EAR costs forecasted for plant generation, purchased power, MISO charges and asset-based sales of \$77,084,271.²⁵ Attachment 3.1 shows the result of the Encompass economic dispatch forecast, including the 2026 EAR costs by category and related MWh. These EnCompass results support several of the fuel and purchase power costs applicable to the EAR.

The Department's review of Otter Tail's 2026 forecasted Minnesota EAR costs assesses the reasonableness of the amounts incorporated into this estimate and identifies costs inconsistent with historical data. The Department's review of the instant forecast did not identify any issues warranting adjustment. The following discussion addresses the subcategories of the 2026 forecasted Minnesota EAR costs.

The following Table 5 (\$/MWh), Table 6 (MWh), and Table 7 (\$) summarize the data Otter Tail provided on plant generation, , purchased power, wind curtailment, and asset-based sales. These additional requirements were filed in compliance with the March 12, 2024, Order of Docket No. E-999/CI-03-802.²⁶

Table 5: Otter Tail's EAR 2022–2024 Historical Minnesota Data \$/MWh²⁷ Compared to 2026 Forecast

EAR Component Category	2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-2024 Average
Plant Generation	17.14	23.91	16.86	20.76	20.51
Purchased Power	51.30	28.08	34.34	40.77	34.40
Wind Curtailment	18.77	39.31	51.48	33.24	41.35
Asset Based Sales	(66.47)	(77.30)	(68.52)	146.05	0.08
Total MN Plant Level²⁸	27.45²⁹	19.31/17.22	20.13/18.10	23.87/21.46	21.11/18.93

²⁴ Petition at 9.

²⁵ Petition, Appendix A, page 6 and Attachment 12.

²⁶ Petition at 28 and Attachment 12, at 1-3.

²⁷ To arrive at the average \$/MWh amounts shown in Table 5, the dollar amounts in Table 7 are divided by the MWh amounts in Table 6 for each applicable EAR category. See Petition Attachment 12 page 9 of 9 and Response to IR 1, Tab "MN FCA Att 12".

²⁸ Line 5 = amounts shown in Table 7 divided by the amounts in Table 6 for each applicable EAR category.

²⁹ Per email with OTP, the \$27.45 is based on plant generated and purchased kWh whereas the \$27.94 in Table 2 is based on retail kWh to calculate the FCA rate.

Table 5 shows Otter Tail's MN system data \$/MWh 2026 forecast is 30% higher than the corresponding 2022 – 2024 average. This higher forecasted \$/MWh figure is driven primarily by the higher \$/MWh forecasted costs, described in detail below.

Table 6: Otter Tail's EAR 2022 – 2024 Historical MWh Data Compared to 2026 Forecast³⁰

EAR Component Category	2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-2024 Average
Plant Generation	1,621,194	1,224,915	1,711,637	1,434,091	1,456,881
Purchased Power	1,248,704	1,361,872	1,295,737	1,339,196	1,332,268
Wind Curtailment	3,653	2,191	510	10,371	4,357
Asset Based Sales	-64,882	-130,211	-167,787	-120,930	-139,643
Total MN Plant Level³¹	2,808,668	2,458,766	2,840,097	2,662,729	2,653,863

Table 7: Otter Tail's EAR 2022 – 2024 Historical Net Cost (\$) Data Compared to 2026 Forecast³²

EAR Component Category	2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-2024 Average
Plant Generation	27,792,834	29,292,783	28,852,417	29,769,669	29,304,956
Wholesale Market Charges	(6,765,636)	(13,474,510)	(7,305,825)	(8,342,875)	(9,707,737)
Purchased Power	64,058,034	38,245,371	44,498,485	54,593,968	45,779,275
Wind Curtailment	68,571	86,122	26,256	344,782	152,387
Asset Based Sales	(4,312,442)	(10,065,913)	(11,496,793)	(17,662,312)	(13,075,006)
MN Solar Generation Credit, Steam and Water Sales Margin and Reagent Costs, and Planning Resource Auction Revenues	(3,757,089)	(1,754,419)	(3,172,640)	(1,548,532)	(2,158,530)
Total MN Plant Level	77,084,271	42,329,434	51,401,999	57,154,701	56,992,601

Otter Tail provided the following explanation for the significant differences between the 2026 forecast and the 2022-2024 average actuals in the costs and revenues related to the EAR component categories as follows:³³

³⁰ DOC IR 01, Attachment 1, 'Att 12 MWh'.

³¹ Line 6 = Sum of lines 1-6.

³² DOC IR 01, Attachment 1, 'Att 12 \$'.

³³ DOC IR 01, Attachment 1, 'Att 12 \$'.

- Otter Tail's 2026 forecasted net wholesale market charges are approximately 72% lower than the 2022 – 2024 average. The Company explained in a response to IR 02, that the averages in Attachment 12 incorrectly included RT ASM Non-Excessive Energy and RT ASM Excessive Energy. The correct calculations are provided in Attachment 01 to MN-DOC-001, Tab 'Att 12 NOT PUBLIC.' These corrected calculations do not impact the calculation of the 2026 EAR rates. This correction changes the percentage variance of MISO Wholesale Market Charges to 32.67%.³⁴ This difference is due to changing market dynamics driven by changes in congestion patterns.
- Otter Tail's 2026 forecasted wind curtailment costs are approximately 55% lower than the 2022 – 2024 average. The Company noted this difference is due to lower forecasted MWh compared to recent years. **[TRADE SECRET DATA HAS BEEN EXCISED]**³⁵
- Otter Tail's 2026 forecasted asset-based sales, which are a credit to the EAR calculation, are approximately 67% lower than the 2022 – 2024 average. The Company explained that forecasted OTP-owned resources' fuel cost per MWh is higher than in recent years, combined with a reduction in MWhs attributable to Asset Based Sales, leads to decreasing margins from asset-based sales. In addition, the removal of the Minnesota portion of Coyote Station for generation beginning in June 2026 has a downward effect on the total Asset Based Sales available.³⁶

The Department concludes Otter Tail's explanations addressing the differences between its 2026 forecasted EAR cost and revenue component categories and the corresponding 2022 – 2024 averages are overall reasonable. The Department discusses the significant increase in purchase power below.

E. DISCUSSION OF OTTER TAIL'S 2026 FORECAST OF NET SYSTEM EAR COSTS BY CATEGORY

In the upcoming subsections, the Department discusses each of the costs/credits contained in the broad categories Otter Tail used to calculate its 2026 net system EAR cost: plant generation, wholesale market charges, purchased power, wind curtailment, and asset-based sales.

³⁴ DOC IR 02.

³⁵ Petition, Attachment 12 at 3.

³⁶ DOC IR 06.

E.1. Plant Generation

The following Table 8 (\$/MWh), Table 9 (MWh), and Table 10 (\$), summarize the 2022 – 2024 actual and 2026 forecasted data Otter Tail provided for each of its generation plants.³⁷ Because wind and solar generation resources do not have associated fuel costs, the Department did not include rows for wind and solar per-unit fuel cost in Tables 8 and 10. Of note, Otter Tail placed the Merricourt wind facility and the Astoria natural gas facility into service in 2020 and 2021, respectively. The Company also retired its Hoot Lake coal facilities in 2021.

Table 8: Otter Tail's Generation 2021 – 2023 Historical \$/MWh³⁸ Data Compared to 2026 Forecast

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Plant Generation Total	17.14	23.91	16.86	20.76	20.51
2	Total Coal ³⁹	30.30	37.17	24.66	24.38	28.74
2.1	Big Stone	[TRADE SECRET DATA HAS BEEN EXCISED]				
2.2	Coyote					
2.3	Hoot Lake 2 & 3					
3	Total Wind	0	0	0	0	0
4	Total Hydro	0	0	0	0	0
5	Total Oil Peaking Units	262.85	692.6	468.69	456.58	539.29
5.1	Jamestown 1	[TRADE SECRET DATA HAS BEEN EXCISED]				
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas					
6.1	Solway					
6.2	Astoria					
7	Total Solar	0	0	0	0	N/A

³⁷ Petition, Attachment 12.

³⁸ Ibid.

³⁹ Includes cost of fuel oil for coal generation facilities.

Table 9: Otter Tail's Generation 2022 – 2024 Historical MWh Data Compared to 2026 Forecast⁴⁰

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Plant Generation Total	1,621,194	1,224,915	1,711,637	1,434,091	1,456,881
2	Total Coal	643,929	594,422	846,398	833,975	758,265
2.1	Big Stone	[TRADE SECRET DATA HAS BEEN EXCISED]				
2.2	Coyote					
2.3	Hoot Lake 2 & 3					
3	Total Wind	654,644	364,791	551,092	474,077	463,320
3.1	Landon Wind	[TRADE SECRET DATA HAS BEEN EXCISED]				
3.2	Ashtabula Wind					
3.3	Ashtabula III					
3.4	Luverne Wind					
3.5	Merricourt					
4	Total Hydro	9,474	4,610	4,256	5,891	4,919
5	Total Oil Peaking Units	775	135	455	481	357
5.1	Jamestown 1	[TRADE SECRET DATA HAS BEEN EXCISED]				
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas					
6.1	Solway					
6.2	Astoria					
7	Total Solar	90,294	62,583	34,889	99	32,524

⁴⁰ Petition, Attachment 12.

7.1	Solar - Flickertail	[TRADE SECRET DATA HAS BEEN EXCISED]
	Solar - Solway	
7.3	Solar- <40 kW	
	Solar- Hoot Lake	
7.4	Solar	

Table 10: Otter Tail's Generation 2022 – 2024 Historical Cost (\$) Data Compared to 2026 Forecast⁴¹

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Plant Generation Total	27,792,834	29,292,783	28,852,417	29,769,669	29,304,956
2	Total Coal	19,510,048	22,092,172	20,868,842	20,336,382	21,099,132
		[TRADE SECRET DATA HAS BEEN EXCISED]				
2.1	Big Stone					
2.2	Coyote					
2.3	Hoot Lake					
3	Total Wind	-	-	-	-	-
4	Total Hydro	-	-	-	-	-
5	Total Oil Peaking Units	203,664	93,211	213,254	219,739	175,402
		[TRADE SECRET DATA HAS BEEN EXCISED]				
5.1	Jamestown 1					
5.2	Jamestown 2					
5.3	Lake Preston					
6	Total Natural Gas					
6.1	Solway					
6.2	Astoria					
7	Total Solar	-	-	-	-	-

Overall, Otter Tail's forecasted 2026 Minnesota EAR costs was \$17.14 per MWh for Company-owned generation which is less than the most recent 2024 actuals of \$23.91 per MWh and less than the 2022 – 2024 actual three-year average of \$20.51 per MWh, as shown in Table 8 above.

Based on our review, the Department concludes Otter Tail's forecasted 2026 EAR costs for Company-owned generating units appears reasonable. The Department recommends the Commission approve Otter Tail's forecasted 2026 EAR costs for Company-owned generation for the purpose of setting initial 2026 EAR rates in this proceeding, subject to the subsequent true-up.

⁴¹ Petition, Attachment 12.

E.2. Wholesale Market Charges

Table 11 below summarizes the 2022 – 2024 actual and 2026 forecasted data Otter Tail provided for its wholesale market charges.⁴²

Table 11: Otter Tail’s 2022 – 2024 Historical and 2026 Forecasted Wholesale Market Charges (\$)

Wholesale Market Category	2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1 Total Net Wholesale Market	(6,765,636)	(13,474,510)	(7,305,825)	(8,342,875)	(9,707,737)
MISO Wholesale Market					
2 Charges (Non-Energy)	(5,934,059)	(12,338,500)	(7,490,195)	(6,612,459)	(8,813,718)
SPP Wholesale Market					
3 Charges (Non-Energy)	(193,031)	(462,629)	441,544	(1,610,575)	(543,887)
4 MISO ASM	(638,545)	(673,381)	(257,173)	(119,840)	(350,132)

Otter Tail provided the following description of each wholesale market charges category:

MISO [Midcontinent Independent System Operator] Wholesale Market Charges (Non-Energy): This category forecasts numerous, miscellaneous MISO wholesale charges and credits including uplift charges, make whole payments, financial transmission rights charges and credits, real time miscellaneous charges, etc. This summary also includes forecasting for net congestion and net loss charges and credits. These are charges and costs associated with moving energy from Otter Tail generation resources to Otter Tail load.

SPP [Southwest Power Pool] Wholesale Market Charges (Non-Energy): The primary drivers of the SPP wholesale market charges forecast is the Real-Time Over Collected Losses Distribution Amount, the Real-Time Pseudo-Tie Congestion Amount, the Real-Time Pseudo-Tie Loss Amount, and the Auction revenue Rights Annual Daily Amount, and the Auction Revenue Rights Annual Closeout Amount. These charge types are the result of Otter Tail’s required SPP transmission service necessary to serve Otter Tail’s pseudo tied load within the SPP footprint. This category also forecasts other numerous, miscellaneous SPP wholesale charges and credits.

MISO ASM [Ancillary Services Market] Market Charges: This category forecasts MISO ASM charges and credits, including regulation reserves, spinning reserves, supplemental reserves, and short-term reserves, both

⁴² Petition, Attachment 12.

withdrawn by Otter Tail load and produced by Otter Tail generation. It also includes other miscellaneous charges associated with the ASM market.⁴³

The Company also described how it forecasted the wholesale market charges:

Approximately 70 MISO and SPP wholesale market charge types. The Company forecasts each charge type individually. The primary methods Otter Tail Power uses to forecast the different charge types vary according to the charge type and include averaging, application of calculated historical rates, and scaling to meet forecasted loads. The Company based all forecasting methods on historical data and future projections. For historical data, Otter Tail Power used the most recent 24 months of available data, which included April of 2023 through March of 2025.⁴⁴

The Department notes that the Petition Attachments 4.1 - 4.3 of the 2026 filing identify all charges (costs and revenues) for the MISO wholesale market, SPP wholesale market, and MISO ASM transactions included in the forecasted 2026 EAR costs. While the Company's wholesale market charges have fluctuated over time, Otter Tail's proposed revenue/credit (a subtraction from the EAR calculation) of \$6,765,636 for 2026 is approximately 72% lower than the corresponding 2022 - 2024 three-year average revenue/credit of \$9,707,737. The primary driver causing this decrease was the SPP Wholesale Market Charges. The Department issued DOC IR 3 to gain clarity on what was driving the decrease. In their response, the Company states the "the primary driver of the variance is the changing market dynamics driven by changes in congestion patterns. The forecast is developed based on two years of history attempting to capture the changing congestion patterns and is demonstrated in the "RT Pseudo Tie Congestion Amount," "RT Pseudo Tie Loss Amount," and the "RT Over-Collected Losses and Distribution Amount."⁴⁵

Based on our review, the Department concludes Otter Tail's forecasted 2026 wholesale market charges appear reasonable. The Department recommends the Commission approve Otter Tail's forecasted 2026 wholesale market charges for the purpose of setting initial 2026 EAR rates in this proceeding, subject to the subsequent true-up.

E.3. Purchased Power

The following Table 12 (\$/MWh), Table 13 (MWh), and Table 14 (\$) summarize the 2022 – 2024 actual and 2026 forecasted data Otter Tail provided for its purchased power.

⁴³ Petition at 20.

⁴⁴ Petition at 19.

⁴⁵ Department Attachment 1.

Table 12: Otter Tail's Purchased Power 2022 – 2024 Historical \$/MWh³⁵ Data Compared to 2026 Forecast⁴⁶

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Total Purchased Power	51.30	28.08	34.34	40.77	34.40
2	Edgeley PPA	[TRADE SECRET DATA HAS BEEN EXCISED]				
3	Langdon PPA					
4	Ashtabula III PPA					
5	Tribal (WAPA)					
6	WAPA Energy Imbalance					
7	Shared Loads					
8	Small Co-Gen					
9	Bilateral Purchases					
10	Market Purchases					

Table 13: Otter Tail's Purchased Power 2022 – 2024 Historical MWh Data Compared to 2026 Forecast⁴⁷

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Total Purchased Power⁴⁸	1,248,704	1,361,872	1,295,737	1,339,196	1,332,268
2	Edgeley PPA	[TRADE SECRET DATA HAS BEEN EXCISED]				
3	Langdon PPA					
4	Ashtabula III PPA					
6	WAPA Energy Imbalance					
7	Shared Loads					
8	Small Co-Gen					
9	Bilateral Purchases					
10	Market Purchases					

⁴⁶ Petition Attachment 12.

⁴⁷ Ibid.

⁴⁸ Line 1 = Sum of lines 2 - 9.

Table 14: Otter Tail's Purchased Power 2022 – 2024 Historical Cost (\$) Data Compared to 2026 Forecast⁴⁹

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Total Purchased Power⁵⁰	64,058,034	38,245,371	44,498,485	54,593,968	45,779,275
2	[TRADE SECRET DATA HAS BEEN EXCISED]					
3						
4						
6						
7						
8						
9						
10						

Market purchases are a major determining factor in the overall cost of purchased power, and, as Otter Tail explained, the economic dispatch model determines the amount of market purchases as follows:

As a member of MISO, each day Otter Tail offers all of its available generation into the MISO market and acquires all its energy from the MISO market. From a cost of energy perspective, the proceeds from the sale of Otter Tail's generation into the market offsets costs associated with energy withdrawals for load. In instances where Otter Tail load is greater than Otter Tail's combined dispatch generation and existing purchased power amounts, Otter Tail procures the remaining energy from the market. Forecasted market purchases are determined using the EnCompass model to project hourly economic dispatch of generation where the forecasted hourly market prices are compared to the marginal cost of Otter Tail's thermal units. If the hourly market price is less than the marginal cost of Otter Tail's units, an hourly market purchase is made (subject to self-commitment and minimum run restrictions on the thermal units).⁵¹

Otter Tail's forecasted 2026 purchased power costs of \$51.30 per MWh is 49% higher than the 2022 – 2024 three-year average of \$34.40 per MWh as shown on Table 12 above is mainly due to increases in Market Purchases. When asked about this increase in IR 5, the Company stated that the increase is mainly due to the June 1, 2026, AME implementation of Coyote Station. Market purchases replace the

⁴⁹ Petition Attachment 12.

⁵⁰ Line 1 = Sum of lines 2-9.

⁵¹ Petition at 16.

energy that would have been generated by Coyote Station and will continue to replace the energy until Otter Tail Power procures new resources to replace the lost generation.⁵²

Based on our review, the Department concludes Otter Tail’s forecasted 2026 purchased power costs appear generally reasonable. However, the Department requests that the Company provide significant supporting documentation in their future 2026 true-up filing for their 2026 purchase power costs in order to ensure rate recovery of these costs. The Department recommends the Commission approve Otter Tail’s forecasted 2026 purchase power costs for the purpose of setting initial 2026 EAR rates in this proceeding, subject to the subsequent true-up and Otter Tail providing significant supporting documentation in their future 2026 true-up filing for their 2026 purchase power costs in order to ensure rate recovery of these costs.

E.4. Wind Curtailment

Table 15 below summarizes the 2022 – 2024 actual and 2026 forecasted data Otter Tail provided for its wind curtailment.⁵³

Table 15: Otter Tail’s 2022 – 2024 Historical and 2026 Forecasted Wind Curtailment⁵⁴

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Wind Curtailment (\$/MWh)	18.77	39.31	51.48	33.24	41.35
2	Wind Curtailment (MWh)	3,653	2,191	510	10,371	4,357
3	Wind Curtailment (\$)	68,571	86,122	26,256	344,782	152,387

Otter Tail explained it developed its monthly forecasted 2026 wind curtailment costs using the monthly averages “of the available actual wind curtailment MWh for the wind PPA(s) subject to wind curtailment. Forecasted wind curtailment costs were then determined by multiplying the forecasted monthly MWhs by the 2026 blended forecasted annual average cost per MWh of Otter Tail’s wind PPAs subject to wind curtailment.”⁵⁵ Since Ashtabula III became an Otter Tail-owned wind resource in 2023, the 2026 forecasted MWh is once again lower for wind curtailments than the 2022-2024 average. Given the fluctuation in historical wind curtailment costs and the de minimis amounts involved, the Department does not raise an issue at this time regarding the Company’s 2026 forecast of these costs.

The Department recommends the Commission approve Otter Tail’s forecasted 2026 wind curtailment costs for the purpose of setting initial 2026 EAR rates in this proceeding, subject to the subsequent true-up.

⁵² DOC IR 5.

⁵³ Petition Attachment 12.

⁵⁴ Ibid.

⁵⁵ Petition at 18.

5. Asset-Based Sales

Table 16 below summarizes the 2022 – 2024 actual and 2026 forecasted data Otter Tail provided for its asset-based sales.⁵⁶

Table 16: Otter Tail’s 2022 – 2024 Historical and 2026 Forecasted Asset-Based Sales⁵⁷

		2026 Forecast	2024 Actuals	2023 Actuals	2022 Actuals	2022-24 Average
1	Asset Based Sales (\$/MWh)	(66.47)	(77.30)	(68.52)	146.05	0.08
2	Asset Based Sales (MWh)	(64,882)	(130,211)	(167,787)	(120,930)	(139,643)
3	Asset Based Sales (\$)	(4,312,442)	(10,065,913)	(11,496,793)	(17,662,312)	(13,075,006)

Regarding Table 16, Asset-Based Sales, for the amounts highlighted in yellow, first, the Department asks Otter Tail to address in reply comments if the 2022 asset-based sales for 2022 should be a credit of (\$146.05) on per MWh basis. Second, the Department asks Otter Tail to address in reply comments if the 2022 to 2024 three-year average asset-based sales should be a credit of \$93.63 on per MWh basis, not the \$0.08 noted above. Third, the Department asks Otter Tail to address in reply comments why the MWh for asset-based sales are forecasted to be significantly lower for 2026.

Otter Tail explained the economic dispatch model determines the amount of asset-based sales as follows:

In certain situations, Otter Tail may sell more energy into the market from its generation fleet than what Otter Tail needs to serve its own load. In these situations, any asset-based margins that are realized are credited to the EAR rate calculation. Asset-based margins are the net difference between asset-based sales and the fuel cost of sales associated with asset-based sales. Similar to market purchases, forecasted asset-based sales are derived from the hourly economic dispatch where the hourly market prices are compared to the marginal cost of Otter Tail’s thermal units (that are running to meet customer load). If the hourly market price is more than the marginal cost of Otter Tail’s units (and the unit generation is not needed to meet customer need), Otter Tail’s unit is assumed to be dispatched, and an hourly asset-based sale is made.⁵⁸

In its Petition, Otter Tail noted “The 2026 forecasted asset-based sales are higher than historical asset-based sales due to the interdependent relationship of all the 2026 EnCompass model inputs and was

⁵⁶ Petition Attachment 12.

⁵⁷ Ibid, The Department did not separate the components of the asset-based sales (fuel costs and asset-based margins) in Table 16, because Otter Tail provided combined MWh and \$/MWh data for its asset-based sales.

⁵⁸ Petition at 18.

the result of the EnCompass model determining there were more instances where an asset-based sale would be made in this 2026 forecast compared to recent history. The 2026 forecasted asset-based sales amount of \$9.1million.”⁵⁹ The Department notes that the \$9.1 million is gross asset-based sales and the amount shown in Table 16 is the net asset-based sales (with fuel costs excluded) of \$4.3 million for the 2026 EAR forecast.

Based on our review, the Department request Otter Tail respond to the Department’s three questions above related to Otter Tail’s asset-based sales before we reach our conclusion.

F. MISO PLANNING RESOURCE AUCTION REVENUES

The Department notes MISO operates an annual PRA which covers the period from June through May of the following year. The annual PRA allows utilities to purchase needed capacity or sell excess capacity for the upcoming planning year. In recent years, the prices paid or received under the annual PRA have increased. As a result, the Department asked Otter Tail Power several questions regarding their 2022-2023 PRA results.⁶⁰

On April 14, 2022, MISO issued the results of its 2022-2023 Planning Resource Auction which covers the period from June 2022 through May 2023. As shown in the April 14, 2022, MISO Resource Adequacy presentation, the capacity auction clearing prices totaled approximately \$237 per megawatt-day.⁶¹ According to Otter Tail, it sold 871.5 MW for \$75,280,954.35 the 2022-2023 PRA.⁶²

Since the Department understood capacity prices in PRAs were likely to remain elevated for the foreseeable future, we recommended Otter Tail provide in reply comments an estimate of PRA revenues, and recalculated FCA/EAR rates, it expected to receive during its 2023 FCA forecast period covering January 2023 through December 2023. The Department’s position was since customers pay for plant and purchased capacity costs; the related revenues should be given back to customers.

On August 1, 2022, the Company filed reply comments respectfully disagreeing with the Department’s request to include MISO PRA revenues in the EAR. The Department filed response comments on October 7, 2022, with a continued recommendation that the Commission require Otter Tail to include the PRA revenues in the 2023 FCA/EAR rates.

Otter Tail filed supplemental comments on October 20, 2022, proposing the Commission either approve the FCA and associated rates as submitted in its original May 2022 filing, or alternatively, approve the proposal to incorporate PRA revenues or costs into the EAR, in what amounted to a two-way ROE tracker. The Department filed a response on November 17, 2022, expressing its opposition to the proposed tracker and continued recommendation to include the revenues only in the EAR.

⁵⁹ Petition at 26.

⁶⁰ Otter Tail’s Response to IR No. 13 in Docket No. E002/AA-20-462.

⁶¹ MISO’s 2022-2023 PRA results: [MISO 2022-2023 PRA results](#)

⁶² Otter Tail’s Response IR No. 13 in Docket No. E002/AA-20-462.

On December 29, 2022, the Commission filed its Order Approving Forecasted Rates as Modified and Requiring Revised 2023 Forecast and Customer Notice. In that Order, the Commission required Otter Tail to reduce its 2023 FCA forecasted fuel costs by \$3.89 million to reflect credits for PRA revenues. Otter Tail states their 2023 FCA rates were updated to include that revenue and that they will update the 2023 rates for June-December as soon as those results are known.⁶³

On July 31, 2023, Otter Tail filed reply comments in Docket No. E017/AA-23-181, reporting PRA revenues received of \$329,908. Since the PRA revenues are under a quarter percentage point change, the revenue was deemed immaterial. Therefore, Otter Tail proposed they be included in the 2023 annual FCA True-Up filing.

Otter Tail included the PRA revenues of \$329,908 in their March 1, 2024, FCA True-Up filing in Docket No. E017/AA-22-214. The Department filed comments on the 2023 annual FCA True-Up filing on April 15, 2024. The FCA True-Up was approved by the Commission on June 27, 2024, pending final Orders. Regarding PRA costs/revenues for 2025, the Company included the following:

No estimated PRA costs or revenues for the 2025 portion of the June 2024/May 2025 MISO planning year are included in this EAR forecast due to uncertainty in the ability to forecast those results. Once the Planning Year 2024/2025 results are known, if they are material, Otter Tail will include the 2025 portion of those results in the forecast and provide updated rates with our July 31, 2024, Reply Comments in this Docket.⁶⁴

On April 28, 2025, MISO issued the results of its 2025-2026 Planning Resource Auction which covers the period from June 2025 through May 2026. As shown in the April 28, 2025, MISO Resource Adequacy presentation, the capacity auction clearing prices totaled approximately \$217 per megawatt-day.

The Department requests Otter Tail provide in reply comments the PRA auction revenues for the 2025/2026 planning year, including the related MWhs and all supporting information and calculations. The Department will review this information before reaching a conclusion on the PRA forecast and overall, EAR rates.

⁶³ Docket No. E017/AA-24-65, at 22.

⁶⁴ Ibid.

G. CUSTOMER NOTIFICATION

Otter Tail provided its proposed customer notification in Petition Attachment 10. The Department verified the language in this notification is consistent with language approved in the Company's 2024 FCA/EAR forecast in Docket No. E017/AA-23-181. The Department recommends the Commission approve the Company's proposed customer notification, updated as applicable with the effective date and rates approved in the instant Petition.

III. DEPARTMENT CONCLUSIONS AND RECOMMENDATIONS

The Department has requested additional information from Otter Tail in its reply comments, and as a result will not make a recommendation to approve Otter Tail's 2026 EAR forecast until we have a chance to review this additional information. However, the Department makes the following recommendations based on our review to date:

- Accept Otter Tail's Petition as complying with the EAR forecast reporting requirements.
- Approve the Company's proposed customer notification, updated as applicable with the effective date and rates approved in the current Petition.

Address the following issues in reply comments:

- For the Minnesota Jurisdictional sales forecast (which is approximately 47.4% of the systems sales) Otter Tail provides a 2,758,656,715 kWh or 2,758,657 MWh on Attachment 2 of the Petition which was used to calculate the EAR 2026 forecasted rate, however, Attachment 6 shows 2,769,788,843 kWh or 2,769,789 MWh. The Department recommends the Company explain in reply comments the difference between these two sales forecasts, and why the higher Minnesota sales forecasts on Attachment 6 is not used for the calculating the Minnesota 2026 forecasted EAR rates.
- The Department requests that the Company provided significant supporting documentation in their future 2026 true-up filing for their 2026 purchase power costs in order to ensure rate recovery of these costs.
- Regarding Table 16, Asset-Based Sales, for the amounts highlighted in yellow, first, the Department asks Otter Tail to address in reply comments if the 2022 asset-based sales for 2022 should be a credit of (\$146.05) on per MWh basis. Second, the Department asks Otter Tail to address in reply comments if the 2022 to 2024 three-year average asset-based sales should be a credit of \$93.63 on per MWh basis, not the \$0.08 noted above. Third, the Department asks Otter Tail to address in reply comments why the MWh for asset-based sales are forecasted to be significantly lower for 2026.
- The Department requests Otter Tail provided in reply comments the PRA auction revenues for the 2025/2026 planning year, including the related MWhs and all supporting information and calculations. The Department will review this information before reaching a conclusion on the PRA forecast and overall EAR rates

If, in the current docket, Otter Tail submits a revised 2026 forecast (as the Company did in its 2021 forecast in Docket No. E017/AA-20-462), the Department recommends the Company include the following in reply comments:

- Identify all inputs to the economic dispatch model with revised value(s), with a narrative fully describing each and all such inputs. For each such input, explain the need for the value(s) revision and fully justify the reasonableness of the corresponding revised value(s).
- Provide revised red-lined and clean versions of all tables (Tables 2 - 16) included in the Department's comments, with a narrative explaining and fully justifying any data changes.
- Provide revised responses to all the Department's discovery to date.

OTTER TAIL POWER COMPANY
Docket No: E017-AA-25-65

Response to: MN Department of Commerce
Analyst: Lynn Behr and Mark Johnson
Date Received: May 12, 2025
Date Due: May 22, 2025
Date of Response: May 21, 2025
Responding Witness: Christopher Byrnes Supervisor Regulatory Analysis, 218-739-8282

Information Request:

Topic: Excel Spreadsheets

Reference(s): See the body of this information request

Request:

Please provide, with all formulas and links intact, the Excel spreadsheet version of Petition Tables 1 to 6, and 8 and Attachments 1, 2, 3.1, 3.2, 4.1, 4.2, 4.3, 5, 6, 7, 8, 11, 12, 13, 14 and Appendix A page 6 of 12, included in Otter Tail's May 1, 2025 Petition.

Attachments: 1

Attachment 1 to IR MN-DOC-001_PUBLIC.pdf

Response:

Attachment 1 to IR MN-DOC-001 contains sensitive energy generation resource information (the "Protected Data"). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes 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).

Otter Tail Power provides Attachment 1 to IR MN-DOC-001.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-25-65

Response to: MN Department of Commerce

Analyst: Lynn Behr and Mark Johnson

Date Received: May 12, 2025

Date Due: May 22, 2025

Date of Response: May 21, 2025

Responding Witness: Christopher Byrnes Supervisor Regulatory Analysis, 218-739-8282

Information Request:

Topic: MISO Wholesale Market Charges

Reference(s): Petition Attachment 12, page 2

Request:

Please provide additional detail on what is driving the 95.58% variance from the 2026 forecast to the 3-year average for MISO Wholesale Market Charges.

Attachments: 0

Response:

In drafting the response to Information Request MN-DOC-002 Otter Tail Power discovered that the averages in Attachment 12 incorrectly included RT ASM Non-Excessive Energy and RT ASM Excessive Energy. These values are included in Market Purchases and are not used to calculate the 2022 through 2024 actual MISO Wholesale Market Charges. The correct calculations are provided in Attachment 01 to MN-DOC-001, Tab 'Att 12 NOT PUBLIC.' These corrected calculations do not impact the calculation of the 2026 EAR rates. This correction changes the percentage variance of MISO Wholesale Market Charges to 32.67 percent.

The primary driver of the variance is the changing market dynamics driven by changes in congestion patterns. Otter Tail Power develops its forecast based on two years of history to capture these changing patterns. This is demonstrated in the "FTR Hourly Allocation Amount" reduction in DA and RT Losses from historic actuals and the reduction in Congestion.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-25-65

Response to: MN Department of Commerce

Analyst: Lynn Behr and Mark Johnson

Date Received: May 12, 2025

Date Due: May 22, 2025

Date of Response: May 21, 2025

Responding Witness: Christopher Byrnes Supervisor Regulatory Analysis, 218-739-8282

Information Request:

Topic: Purchased Power

Reference(s): Petition Attachment 12, page 2

Request:

Please provide additional detail on what is driving the 39.93% variance from the 2026 forecast to the 3-year average for Purchased Power, specifically the market purchases.

Attachments: 0

Response:

The June 1, 2026 AME implementation of Coyote Station for Minnesota customers mainly drives the variance of 39.93 percent from the 2026 forecast to the 3-year average for purchased power. Market purchases replace the energy that would have been generated by Coyote Station and will continue to replace the energy until Otter Tail Power procures new resources to replace the lost generation.

OTTER TAIL POWER COMPANY

Docket No: E017-AA-25-65

Response to: MN Department of Commerce

Analyst: Lynn Behr and Mark Johnson

Date Received: May 12, 2025

Date Due: May 22, 2025

Date of Response: May 21, 2025

Responding Witness: Christopher Byrnes Supervisor Regulatory Analysis, 218-739-8282

Information Request:

Topic: Asset Based Sales

Reference(s): Petition Attachment 12, page 3

Request:

Please provide additional detail on what is driving the -67.02% variance from the 2026 forecast to the 3-year average for Asset Based Sales.

Attachments: 0

Response:

The increase in Otter Tail Power owned fuel costs per MWh combined with a reduction in MWhs attributable to Asset Based Sales drives the decrease in Asset Based Sales in the 2026 forecast compared to the three-year historic average. In addition, the removal of the Minnesota portion of Coyote Station for generation beginning in June 2026 has a downward effect on the total Asset Based Sales available.

OTP FCA DISCUSSION

February 26, 2025

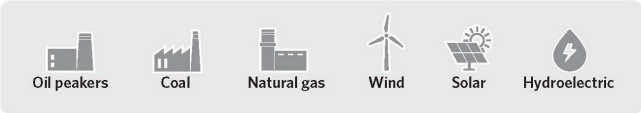
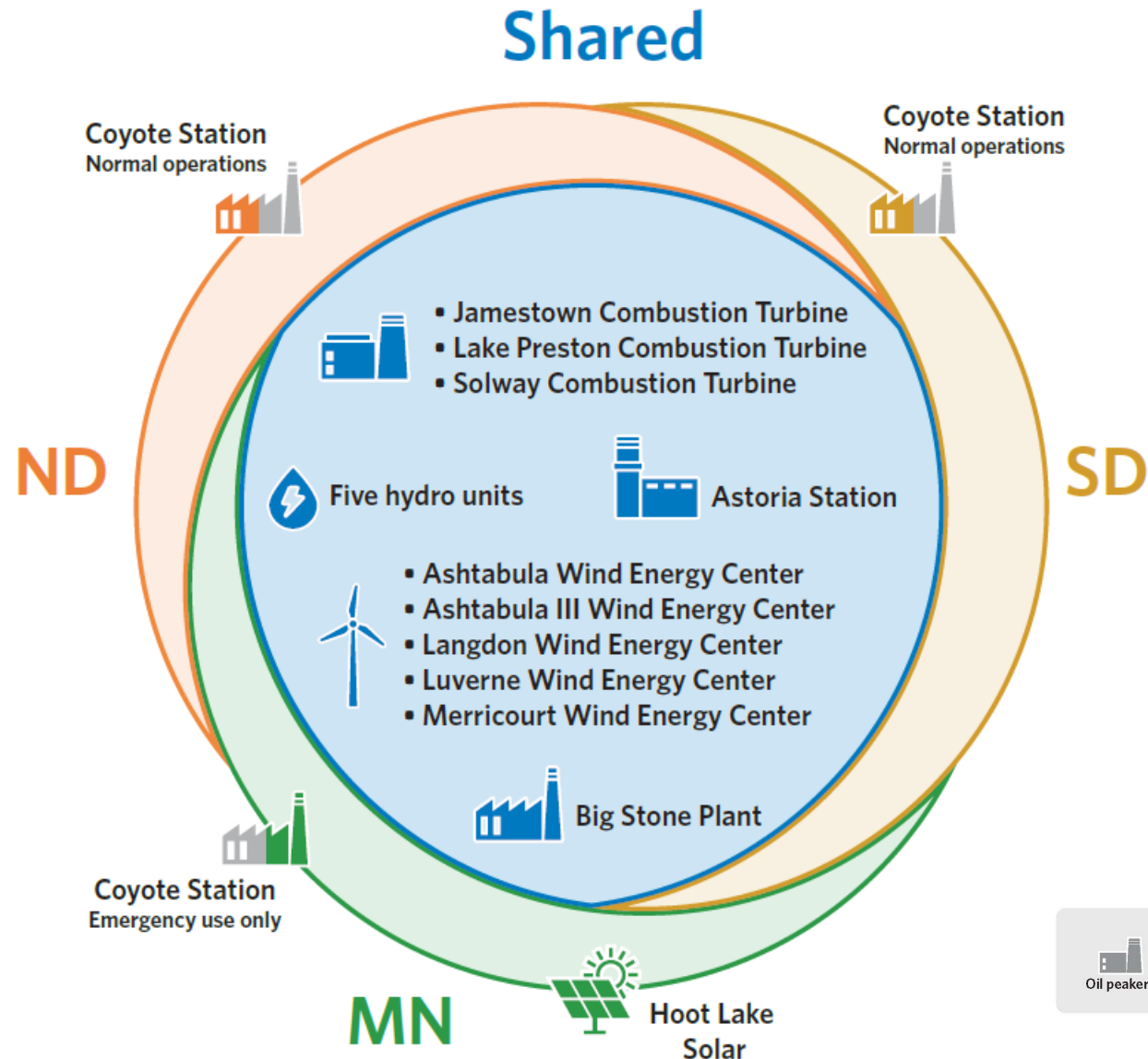




AGENDA

- State Specific Fuel Clause Calculations
- Forecast 2026 FCA (preliminary)
- Resource and Energy Availability
 - Energy procurement/price certainty

FUTURE RESOURCE MIX WITH AME



CHANGES IN FCA CALC

- New Asset Owners in MISO
 - MN will have specific resources; AME at Coyote and Hoot Lake Solar
 - Waiting for SD decision on pending solar projects- these could be shared or MN specific
- AME to start June 1, 2026 (start of MISO Summer)
 - Will show reduced fuel and reagents for Coyote
 - Will show reduced revenue for sales
 - Retains capacity value
- Solway Solar (50MW) expected online end of 2026
- Abercrombie Solar (295MW) expected online end of 2028

MN FCA CHANGES – DESCRIPTION VERSION

Current MN FCA

Shared Costs + MN Specific Costs & Credits=
System Energy Costs MN FCA

System Energy Costs/System kWh=
System Forecast Average Rate

System Average Rate x MN Actual kWh=
MN FCA Revenue

((MN kWh/System kWh) x System Energy Cost)=
Actual Energy Cost

MN FCA Revenue - Actual Energy Cost=
Over or Under Collection

Over or Under Collection/Forecast MN Sales=
True Up Rate

New MN FCA With AME

MN kWh Forecast/System kWh Forecast=
MN Allocator

Shared Costs + MN Specific Costs & Credits=
System Energy Costs MN FCA

MN Allocator x System Energy Costs=
MN Energy Costs

MN Energy Costs + MN DA Cost/MN kWh=
MN Energy Rate

MN FCA Revenue - Actual Energy Cost=
Over or Under Collection

Over or Under Collection/Forecast MN Sales=
True Up Rate

MN FCA CHANGES – EXAMPLE

Current MN FCA

Total System Sales (A):		6,000
Total System Energy Cost With Hoot Lake Solar Credit (B):	\$	120.00
Hoot Lake Solar Credit (C):	\$	(2.40)
Total MN System Energy Costs (B + C)=(D):	\$	117.60
System Average Rate (D / A):	\$	0.0196

MN FCA With AME

Total System Sales (A):		6,000
Total System Energy Cost (B):	\$	120.00
Hoot Lake Solar Credit (C):	\$	(2.40)
Total System Energy Cost with Hoot Lake Solar (B + C)= (D):	\$	117.60
MN Forecast kWh Sales (E):		2,800
MN Allocator (E / A) = (F)		47%
MN Shared Energy Costs (D x MN Allocator) = (G):	\$	54.88
COY Variable Cost - MN Share (1)	\$	(6.80)
Energy Replacement Cost MN* (2)	\$	11.00
MN Total Energy Costs (G+ 1 + 2) = (H)	\$	59.08
MN Energy Rate (H / E):	\$	0.0211
* Replacement energy costs will reduce as more renewables come online		

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/AA-25-65

Dated this **30th** day of **June 2025**

/s/Sharon Ferguson

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Mariah	Bevins	maria.bevins@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	AA-25-65
2	Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	AA-25-65
3	Chris	Byrnes	cbyrnes@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	AA-25-65
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	AA-25-65
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		Yes	AA-25-65
6	Jason	Decker	jason.decker@llojibwe.net	Leech Lake Band of Ojibwe		190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	AA-25-65
7	Richard	Dornfeld	richard.dornfeld@ag.state.mn.us		Office of the Attorney General - Department of Commerce	Minnesota Attorney General's Office 445 Minnesota Street, Suite 1800 Saint Paul MN, 55101 United States	Electronic Service		No	AA-25-65
8	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435 United States	Electronic Service		No	AA-25-65
9	Remi	Engbers	remi.engbers@woodsfuller.com	Woods, Fuller, Shultz & Smith P.C.		300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls SD, 57117-5027 United States	Electronic Service		No	AA-25-65
10	Kelly C.	Engebretson	kelly.engebretson@lawmoss.com	Moss & Barnett		150 S. 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65
11	Michael	Fairbanks	michael.fairbanks@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	AA-25-65
12	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	AA-25-65
13	Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power		PO Box 496 Fergus Falls	Electronic Service		No	AA-25-65

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				Company		MN, 56538-0496 United States				
14	Edward	Garvey	garveyed@aol.com	Residence		32 Lawton St Saint Paul MN, 55102 United States	Electronic Service		No	AA-25-65
15	Amber	Grenier	agrenier@otpc.com	Otter Tail Power Company		215 S. Cascade St. Fergus Falls MN, 56537 United States	Electronic Service		No	AA-25-65
16	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	AA-25-65
17	Annete	Henkel	mui@mnuutilityinvestors.org	Minnesota Utility Investors		413 Wacouta Street #230 St.Paul MN, 55101 United States	Electronic Service		No	AA-25-65
18	Kristin	Henry	kristin.henry@sierraclub.org	Sierra Club		2101 Webster St Ste 1300 Oakland CA, 94612 United States	Electronic Service		No	AA-25-65
19	Katherine	Hinderlie	katherine.hinderlie@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	445 Minnesota St Suite 1400 St. Paul MN, 55101-2134 United States	Electronic Service		No	AA-25-65
20	Faron	Jackson, Sr.	faron.jackson@llojibwe.net			190 Sailstar Drive NW Cass Lake MN, 56633 United States	Electronic Service		No	AA-25-65
21	Richard	Johnson	rick.johnson@lawmoss.com	Moss & Barnett		150 S. 5th Street Suite 1200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65
22	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	AA-25-65
23	Michael	Krikava	mkrikava@taftlaw.com	Taft Stettinius & Hollister LLP		2200 IDS Center 80 S 8th St Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65
24	Bill	Lachowitz	blachowitz@ibewlocal949.org	IBEW Local Union 949		12908 Nicollet Ave S Burnsville MN, 55337-3527 United States	Electronic Service		No	AA-25-65
25	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65
26	Eric	Lipman	eric.lipman@state.mn.us		Office of Administrative Hearings	PO Box 64620 St. Paul MN, 55164-0620 United States	Electronic Service		No	AA-25-65

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
27	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	AA-25-65
28	Tim	Miller	tim.miller@mrenergy.com	Missouri River Energy Services		3724 W Avera Dr PO Box 88920 Sioux Falls SD, 57109-8920 United States	Electronic Service		No	AA-25-65
29	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65
30	Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	AA-25-65
31	Marcia	Podratz	mpodratz@mnpower.com	Minnesota Power		30 W Superior S Duluth MN, 55802 United States	Electronic Service		No	AA-25-65
32	David G.	Prazak	dprazak@otpc.com	Otter Tail Power Company		P.O. Box 496 215 South Cascade Street Fergus Falls MN, 56538-0496 United States	Electronic Service		No	AA-25-65
33	Rate Case Inbox	Rate Case Inbox	mnratecase@otpc.com	Otter Tail		null null, null United States	Electronic Service		No	AA-25-65
34	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	AA-25-65
35	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	AA-25-65
36	Peter	Scholtz	peter.scholtz@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	Suite 1400 445 Minnesota Street St. Paul MN, 55101-2131 United States	Electronic Service		No	AA-25-65
37	Robert H.	Schulte	rhs@schulteassociates.com	Schulte Associates LLC		1742 Patriot Rd Northfield MN, 55057 United States	Electronic Service		No	AA-25-65
38	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th PI E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	AA-25-65
39	Janet	Shaddix Elling	jshaddix@janetshaddix.com	Shaddix And Associates		7400 Lyndale Ave S Ste 190 Richfield MN,	Electronic Service		No	AA-25-65

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55423 United States				
40	Cary	Stephenson	cstephenson@otpc.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	AA-25-65
41	William	Taylor	bill.taylor@taylorlawsd.com	Taylor Law Firm		4820 E. 57th Street Suite B Sioux Falls SD, 57108 United States	Electronic Service		No	AA-25-65
42	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	AA-25-65
43	Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD		4445 W 77th Street Suite 224 Edina MN, 55435 United States	Electronic Service		No	AA-25-65
44	Laurie	Williams	laurie.williams@sierraclub.org	Sierra Club		Environmental Law Program 1536 Wynkoop St Ste 200 Denver CO, 80202 United States	Electronic Service		No	AA-25-65
45	Laurie	York	laurie.york@whiteearth-nsn.gov	White Earth Reservation Business Committee		PO Box 418 White Earth MN, 56591 United States	Electronic Service		No	AA-25-65
46	Patrick	Zomer	pat.zomer@lawmoss.com	Moss & Barnett PA		150 S 5th St #1200 Minneapolis MN, 55402 United States	Electronic Service		No	AA-25-65