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September 23, 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 2017 and 2018 Annual Safety, Reliability and Service Quality Reports
Docket No. E017/M-18-247, E017/M-19-260, E017/M-20-401
Information Filing – Missing Data**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) respectfully submits to the Minnesota Public Utilities Commission (Commission) this information filing. It was brought to our attention by Commission Staff that Reporting meter-reading performance data submitted in our 2017 Safety Reliability Service Quality report (E017/M-18-247) for reporting requirement 7826.1400 was the same data as our 2016 report (E017/M-17-256). We have resubmitted the Reporting Meter-reading performance section of our report below with the 2017 data.

VI. Reporting meter-reading performance 7826.1400

Minnesota Rule 7826.1400, Reporting Meter Reading Performance, requires utilities to provide a detailed report on the utility's meter-reading performance. In compliance with this rule, Otter Tail provides **Tables 11-15** for its meter reading performance for 2017.

A & B. The number and percentage of customer meters read by utility personnel and the number and percentage of customer meters self-read by the customer.

Table 11
Otter Tail Power Company Meter Reading Performance
January 1, 2017 to December 31, 2017
Residential – MN

Residential							
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	59,784	94.78%	2,331	3.70%	960	1.52%	63,075
2	61,336	97.23%	790	1.25%	960	1.52%	63,086
3	61,486	97.44%	654	1.04%	960	1.52%	63,100
4	61,242	96.91%	991	1.57%	961	1.52%	63,194
5	61,588	97.14%	852	1.34%	964	1.52%	63,404
6	62,500	96.97%	988	1.53%	965	1.50%	64,453
7	62,065	96.38%	1,365	2.12%	967	1.50%	64,397
8	62,624	97.13%	884	1.37%	968	1.50%	64,476
9	61,974	96.02%	1,599	2.48%	969	1.50%	64,542
10	61,977	97.06%	909	1.42%	969	1.52%	63,855
11	60,485	95.21%	2,076	3.27%	967	1.52%	63,528
12	61,386	96.81%	1,069	1.69%	955	1.51%	63,410
	738,447	96.59%	14,508	1.90%	11,565	1.51%	764,520

Small Commercial							
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	13,780	94.30%	468	3.20%	365	2.50%	14,613
2	14,032	96.05%	211	1.44%	366	2.51%	14,609
3	14,083	96.49%	146	1.00%	366	2.51%	14,595
4	14,137	96.66%	122	0.83%	367	2.51%	14,626
5	14,739	96.90%	105	0.69%	367	2.41%	15,211
6	14,699	96.10%	229	1.50%	368	2.41%	15,296
7	14,711	95.92%	258	1.68%	368	2.40%	15,337
8	14,824	96.68%	141	0.92%	368	2.40%	15,333
9	14,775	96.24%	209	1.36%	368	2.40%	15,352
10	14,779	96.64%	145	0.95%	369	2.41%	15,293
11	14,485	94.92%	407	2.67%	369	2.42%	15,261
12	14,055	96.17%	200	1.37%	359	2.46%	14,614
	173,099	96.09%	2,641	1.47%	4,400	2.44%	180,140

Large Commercial							
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	1,361	98.13%	26	1.87%	.		1,387
2	1,380	99.57%	6	0.43%	.		1,386
3	1,377	99.42%	8	0.58%	.		1,385
4	1,374	99.21%	11	0.79%	.		1,385
5	1,382	99.86%	2	0.14%	.		1,384
6	1,370	99.13%	12	0.87%	.		1,382
7	1,371	99.20%	11	0.80%	.		1,382
8	1,379	99.93%	1	0.07%	.		1,380
9	1,371	99.20%	11	0.80%	.		1,382
10	1,362	99.49%	7	0.51%	.		1,369
11	1,350	98.11%	26	1.89%	.		1,376
12	1,370	99.06%	13	0.94%	.		1,383
	16,447	99.19%	134	0.81%	.		16,581

System							
Month	Meters Read	%	Meters Estimated	%	Self Read	%	Total Meters
1	74,925	94.75%	2,825	3.57%	1,325	1.68%	79,075
2	76,748	97.05%	1,007	1.27%	1,326	1.68%	79,081
3	76,946	97.30%	808	1.02%	1,326	1.68%	79,080
4	76,753	96.90%	1,124	1.42%	1,328	1.68%	79,205
5	77,709	97.14%	959	1.20%	1,331	1.66%	79,999
6	78,569	96.84%	1,229	1.51%	1,333	1.64%	81,131
7	78,147	96.34%	1,634	2.01%	1,335	1.65%	81,116
8	78,827	97.09%	1,026	1.26%	1,336	1.65%	81,189
9	78,120	96.12%	1,819	2.24%	1,337	1.65%	81,276
10	78,118	97.02%	1,061	1.32%	1,338	1.66%	80,517
11	76,320	95.20%	2,509	3.13%	1,336	1.67%	80,165
12	76,811	96.73%	1,282	1.61%	1,314	1.65%	79,407
	927,993	96.54%	17,283	1.80%	15,965	1.66%	961,241

It was also brought to our attention that in the Reporting Service Extension Request Response Times section of our 2017 and 2018 Safety Reliability Service Quality reports for reporting requirement 7826.1600, the number of days for Locations Not Previously served were blank. These reports are docket Numbers (E017/M-18-247) and (E017/M-19-260) respectively. For the fields that were blank these were meant to have been inserted with a zero, indicating there were no occurrences to report. We appreciate staff bringing this forward as we should have inserted the zeros or denoted this in the comments.

Also, we would like to point out this section (Reporting Service Extension Request Response Times) of our Safety Reliability Service Quality report changed significantly in our 2019 report due to Otter Tail converting to our new CIS system. This is explained in detail on page 54 and 55 of the 2019 report (Docket No. E017/M-20-401).

We apologize for these errors and are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 205-5936 or wolson@otpc.com.

Sincerely,

/s/ WENDI OLSON

Wendi Olson

Regulatory Compliance Specialist

cjh

Enclosures

By electronic filing

c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company 2017 and 2018 Annual Safety,
Reliability and Service Quality Reports
Docket No. E017/M-18-247, E017/M-19-260, E017/M-20-401**

I, Carly Haiby, 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
Information Filing – Missing Data**

Dated this 23rd day of September, 2020

/s/ CARLY HAIBY
Carly Haiby, Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8472

**Official Service List
Docket No. E017/M-18-247**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_18-247_M-18-247
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_18-247_M-18-247
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_18-247_M-18-247
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_18-247_M-18-247
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_18-247_M-18-247
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_18-247_M-18-247
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_18-247_M-18-247
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_18-247_M-18-247
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_18-247_M-18-247
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-247_M-18-247

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Docket No. E017/M-18-247**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_18-247_M-18-247
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_18-247_M-18-247
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_18-247_M-18-247
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_18-247_M-18-247
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-247_M-18-247
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-247_M-18-247
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_18-247_M-18-247

**Official Service List
Docket No. E017/M-19-260**

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_19-260_M-19-260
Gail	Baranko	gail.baranko@xcelenergy.com	Xcel Energy	414 Nicollet Mall7th Floor Minneapolis, MN 55401	Electronic Service	No	OFF_SL_19-260_M-19-260
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_19-260_M-19-260
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_19-260_M-19-260
Ron	Elwood	relwood@mnlisap.org	Mid-Minnesota Legal Aid	2324 University Ave Ste 101 Saint Paul, MN 55114	Electronic Service	No	OFF_SL_19-260_M-19-260
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_19-260_M-19-260
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_19-260_M-19-260
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_19-260_M-19-260
Bruce	Gerhardson	bgerhardson@otpc.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	No	OFF_SL_19-260_M-19-260
Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_19-260_M-19-260

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Alexander	Jackson	ajackson@DuluthMN.gov	Minnesota Power	30 W Superior St Duluth, MN 55802	Electronic Service	No	OFF_SL_19-260_M-19-260
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-260_M-19-260
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_19-260_M-19-260
Annie	Levenson Falk	annief@cupminnesota.org	Citizens Utility Board of Minnesota	332 Minnesota Street, Suite W1360 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-260_M-19-260
Kavita	Maini	kmairi@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_19-260_M-19-260
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_19-260_M-19-260
Stacy	Miller	stacy.miller@minneapolismn.gov	City of Minneapolis	350 S. 5th Street Room M 301 Minneapolis, MN 55415	Electronic Service	No	OFF_SL_19-260_M-19-260
Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_19-260_M-19-260
Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-260_M-19-260
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_19-260_M-19-260

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Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_19-260_M-19-260
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_19-260_M-19-260
Russ	Stark	Russ.Stark@ci.stpaul.mn.us	City of St. Paul	390 City Hall 15 West Kellogg Boulevard Saint Paul, MN 55102	Electronic Service	No	OFF_SL_19-260_M-19-260
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-260_M-19-260
Lynnette	Sweet	Regulatory.records@xcelenergy.com	Xcel Energy	414 Nicollet Mall FL 7 Minneapolis, MN 554011993	Electronic Service	No	OFF_SL_19-260_M-19-260
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_19-260_M-19-260

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Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_20-401_20-401
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James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_20-401_20-401
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Shane	Henriksen	shane.henriksen@enbridge.com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_20-401_20-401
Douglas	Larson	dlarson@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_20-401_20-401
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_20-401_20-401
Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	OFF_SL_20-401_20-401

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Wendi	Olson	wolson@otpc.com	Otter Tail Power Company	215 South Cascade Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_20-401
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Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_20-401_20-401
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	Yes	OFF_SL_20-401_20-401
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_20-401
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_20-401_20-401
Nikhil	Vijaykar	NVijaykar@elpc.org	Enviornental Law & Policy Center	N/A	Electronic Service	No	OFF_SL_20-401_20-401