April 1, 2025

2024 Demand Side Management Financial Incentive Project

Docket No. E017/M-25-49

Annual Filing to Update the ECO Rider

Docket No. E017/M-25-49

2024 ECO Status Report

Docket No. E017/CIP-23-94

OTPCO.COM

OTTER TAIL POWER COMPANY

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April 1, 2025

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

Dr. Pete Wyckoff
Deputy Commissioner
Minnesota Department of Commerce
Division of Energy Resources
85 7th Place East, Suite 500
St. Paul, Minnesota 55101-2198

RE: Status Report – 2024 ECO Activities
Docket No. E017/CIP-23-94

In the Matter of Otter Tail Power Company's Annual Filing of the Demand Side Management Financial Incentive Project
Docket No. E017/M-25-49

In the Matter of Otter Tail Power Company's Annual Filing to Update the Energy Conservation and Optimization Rider
Docket No. E017/M-25-49

Dear Mr. Seuffert and Dr. Wyckoff:

Enclosed please find Otter Tail Power Company's filing in the above referenced matter which includes:

- Executive Summary
- Summary of Filing
- Petition of Otter Tail Power Company
- Financial Incentive
- Status Report
- Conservation Cost Recovery Adjustment
- Appendix A – Tables
- Appendix B – Third Party Evaluations
- Appendix C – Project Information Sheets
- Appendix D – Customer Notice

A Certificate of Service is also enclosed. Otter Tail Power Company has served a copy of this filing on all parties listed on the enclosed Service List. If you or Commission Staff have any questions, please contact me at (218) 739-8240 or czuniga@otpco.com.

Sincerely,

/s/ CRISTINA ZUNIGA
Cristina Zuniga, Supervisor, DSM Administration
Retail Energy Solutions

sjw
Enclosures
By electronic filing
c: Service List

2024 STATUS REPORT, DSM INCENTIVE, AND FILING TO UPDATE THE RIDER EXECUTIVE SUMMARY

On April 1, 2025, Otter Tail Power Company (Otter Tail Power or the Company) files with the Minnesota Public Utilities Commission (Commission or MPUC) and the Minnesota Department of Commerce, Division of Energy Resources (Department) its annual report detailing the Company's previous year's Energy Conservation and Optimization (ECO) activities.

On April 1, 2025, Otter Tail Power Company files its 2024 Status Report.

On April 1, 2025, Otter Tail Power also files its annual filing to update the ECO Rider.

Otter Tail Power would like to emphasize the following points concerning the 2024 Energy Conservation and Optimization activities:

- The Company achieved 3.11 percent energy savings as a percent of retail energy sales, which is on par with our approved goal level of 3.15 percent.[1]
- The Company achieved energy savings of 50,321,324 kWh, achieving 99 percent of the goal. Demand savings were 36 percent of goal.[2]
- The cost per kWh for *first year* savings is $0.16 (16 cents) compared to a budgeted cost of $0.20 (20 cents). Costs are in line with historical averages of $0.14 (14 cents).
- Expenditures were under budget (78 percent) at $7,895,824 based on an approved budget of $10,064,451.[3]
- Net benefits of $35,831,011 were achieved excluding net benefits from regulatory assessments, Efficient Fuel Switching (EFS) Programs, and our Publicly-Owned Property Solar Program.

[1] Adjusted for one-third energy savings from behavioral change programs and includes energy savings from POP Solar.

[2] This is due in large part to a policy shift in what Demand Response Participants are eligible to be captured in Load Management Programs.

[3] Includes modifications approved by the Deputy Commissioner's January 31, 2022, Decision and November 2, 2022, Decision in Docket No. E017/CIP-20-475.

Requests for Approval

- The Company is requesting approval for $ $1,964,142 in performance incentives for 2024 ECO activities, a small share of the total net benefits delivered to customers from investments in ECO.
- The Company is requesting the Average Conservation Cost Recovery Adjustment (CCRA) factor of $0.00585/kWh be reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered (dated) on and after November 1, 2025.
- Approval of the administrative changes requested below to our Energy Conservation and Optimization Rider.
- The Company is requesting approval of the 2024 ECO Tracker, resulting in a year-end balance of negative $3,194,439.

Otter Tail Power has committed resources and developed new, creative approaches in pursuit of higher conservation goals. This pursuit includes an appropriate balance of direct and indirect impact programs. New technologies, delivery mechanisms, and segmentation strategies emphasize Otter Tail Power's commitment to energy efficiency. Recent accomplishments are particularly noteworthy in the face of new building codes and equipment efficiencies and saturated markets. A consistent regulatory environment is critical to overcoming these challenges as utilities continue to pursue Minnesota's Next Generation Act and ECO goals. Otter Tail Power appreciates the support from Minnesota's regulatory agencies as we work together to sustain Minnesota's energy future.

Please note that this filing is available through the eDockets system maintained by the Minnesota Department of Commerce and the Minnesota Public Utilities Commission. Access this document by going to eDockets through the websites of the Department of Commerce or the Public Utilities Commission or going to the eDockets homepage at:

https://www.edockets.state.mn.us/EFiling/home.jsp

Once on the eDockets homepage, this document can be accessed through the Search Documents link and entering in docket number: 23-94.

Please contact Otter Tail Power at 800-493-3299 to request a complete copy of this filing.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Status Report – 2024 ECO Activities	**Docket No. E017/CIP-23-94**
In the Matter of Otter Tail Power Company's Annual Filing of the Demand Side Management Financial Incentive Project	**Docket No. E017/M-25-49**
In the Matter of Otter Tail Power Company's Annual Filing to Update the Energy Conservation and Optimization Rider	**Docket No. E017/M-25-49**
	SUMMARY OF FILING

Otter Tail Power Company (Otter Tail Power or the Company) is pleased to report its 2024 Demand Side Management (DSM) achievements. Energy Conservation and Optimization (ECO) program results for 2024 proved to be another successful year for Otter Tail Power and our customers achieving 3.11 percent energy savings while delivering over $35 million in customer net benefits.

Otter Tail Power is requesting approval of a financial incentive of $1,964,142 to be approved and recovered through its ECO Tracker Account.

Otter Tail Power is requesting the Average Conservation Cost Recovery Adjustment (CCRA) factor of $0.00585/kWh be reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered (dated) on and after November 1, 2025.

Approval of the administrative changes requested below to our Energy Conservation and Optimization Rider.

Lastly, Otter Tail Power is requesting approval of the 2024 ECO Tracker, resulting in a year-end 2024 balance of negative $3,194,439.

STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

Status Report – 2024 ECO Activities	**Docket No. E017/CIP-23-94**
In the Matter of Otter Tail Power Company's Annual Filing of the Demand Side Management Financial Incentive Project	**Docket No. E017/M-25-49**
In the Matter of Otter Tail Power Company's Annual Filing to Update the Energy Conservation and Optimization Rider	**Docket No. E017/M-25-49** **PETITION**

I. INTRODUCTION AND BACKGROUND

Otter Tail Power Company (Otter Tail Power or the Company) is requesting approval of a financial incentive of $1,964,142 to be approved and recovered through its Energy Conservation Optimization (ECO) Tracker Account.

Otter Tail Power is requesting approval of its proposal for a temporary financial incentive mechanism, for Otter Tail Power, at the same level of net benefits payout as the Company's ECO and Load Management energy savings net benefit payout, until a formal Efficient Fuel Switching (EFS) financial incentive is approved by the Commission.

Otter Tail Power is requesting the Average Conservation Cost Recovery Adjustment (CCRA) factor of $0.00585/kWh be reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered (dated) on and after November 1, 2025.

Approval of the administrative changes requested below to our ECO Rider.

Lastly, Otter Tail Power is requesting approval of the 2024 ECO Tracker, resulting in a year-end 2024 negative balance of $3,194,439.

II. REQUEST FOR APPROVAL

Financial Incentive Filing

Otter Tail Power respectfully requests that a financial incentive of $1,964,142. This amount includes $1,867,967 as an incentive for 2024 performance of conservation programs and load management and $96,175 as a financial incentive for 2024 EFS performance.

Details of the incentive calculation and corresponding evaluations of direct impact projects are included in the attached report under the Section entitled "FINANCIAL INCENTIVE."

Energy Conservation and Optimization Rider

The Company is requesting the Average Conservation Cost Recovery Adjustment factor of $0.00585/kWh be reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered (dated) on and after November 1, 2025.

III. LEGAL AUTHORITY

The Petition for approval of Otter Tail Power's Financial Incentive Filing is submitted in accordance with Minn. Stat. § 216B.16, subd. 6c. The Energy Conservation and Optimization Rider is submitted in accordance with the Miscellaneous Tariff rules.

IV. REQUEST FOR VARIANCE TO MINNESOTA RULES

Otter Tail Power requests a variance to Minnesota Rules 7820.3500 (K), Billing Content, which requires fuel or power adjustment clause separately itemized. The requested variance would allow the Company to continue to include the Conservation Improvement Adjustment on customer bills within the Resource Adjustment line item.

Minnesota Rules 7829.3200 authorizes the Commission to grant a variance to its rules when (1) enforcement of the rule would impose an excessive burden on the applicant, (2) the variance would not adversely affect the public interest, and (3) the variance would not conflict with standards imposed by law. Otter Tail Power believes the criteria for granting variances are met since the Company has been using the combined Resource Adjustment since July 1995, and customers have become familiar with the single-line item on their bill.

The continuation of the variance would not adversely affect the public interest and may avoid customer confusion if the bill presentment was altered at this time.

And finally, there are no statutory provisions that would prohibit the variance; therefore, the requirement may be varied pursuant to Minnesota rules 7829.3200.

V. MISCELLANEOUS FILING AND REGULATORY REQUIREMENTS

A. All correspondence with respect to this filing should be sent to:

Cristina Zuniga
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8240
czuniga@otpco.com

We request that all communications regarding this proceeding, including data requests, also be directed to:

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpco.com

B. The effective date of the ECO Rider is November 1, 2025. The effective date of the other filings is the date of Commission approval.

C. Otter Tail Power agrees that the notice and comment periods set forth in the Miscellaneous Tariff Filing rules control the time frame for processing this type of filing.

D. The reason for the filing and its impacts is explained above and in the attached report.

E. Minn. Rules Ch. 7690 contains the requirements and procedures for ECO filings. Minn. Stat. §§ 216B.2401, 216B.241, and 216B.2411 contain provisions utilities must meet in ECO. All compliance points are addressed in this section.

Statutory Requirements

2024 Minimum Spending Requirement

Minn. Stat. § 216B.241, subd. 2b. **Recovery of expenses.** Part (b), requires 1.75 percent of the Company's electric gross operating revenues, not including revenues from large electric customers exempt from ECO, be spent on ECO activities in the previous year, for the electric utility to be eligible to file for recovery of ECO expenses. Otter Tail Power's spending in relation to approved minimum spending is as follows:

Minimum Spending Requirement	$2,658,118
Approved Budget[1]	$10,064,451
2024 Actual Spending	$7,895,824

2024 Minimum Energy Savings Goal

The Company has complied with Minn. Stat. § 216B.241 which sets the minimum energy savings goal of 1.75 percent of MWh sales, determined as a percent of 2020-2022 weather normalized sales.

Energy savings goal at 1.75 percent	28,299,855 kWh
Approved Energy Savings Goal[2]	50,999,311 kWh
2024 Actual Energy Savings	50,321,324 kWh

2024 Low-Income Spending Requirement

The Company has complied with Minn. Stat. § 216B.241, subd. 7. Low-income programs. Part (a) requiring utilities to spend 0.4 percent of residential electric gross operating revenues on low-income programs.

Low-Income Minimum spend at 0.4 percent	$262,268
Low-Income Approved budget	$402,000
Low-Income Actual Spend	$327,701

[1] Includes modifications approved by the Deputy Commissioner's November 7, 2024, Decision in Docket No. E017/CIP-23-94.

[2] Includes modifications approved by the Deputy Commissioner's November 7, 2024, Decision in Docket No. E017/CIP-23-94.

2024 Research and Development 10 Percent Spending Cap

The Company has complied with Minn. Stat. § 216B.241, subd. 2. Public utility; energy conservation and optimization plans. Part (e) which limits spending on Research and Development to 10 percent of the total amount spent and invested on energy conservation improvements.

ECO Spending Budget	$10,064,451
10 percent R&D Spending Cap	$1,006,445
Actual R&D Spending	$69,302

Distributed Energy Resource Ten Percent Spending Cap

The Company has complied with 216B.2411, subd. 1(3)(a) that allows utilities to spend up to 10 percent of the utility's energy conservation improvement spending for distributed generation projects. In 2024, Otter Tail Power spent $432,763 on its Publicly Owned Property (POP) Solar program, 4.3 percent of the total 2024 ECO budget.

Lighting Use and Recycling Programs

The Company has complied with Minn. Stat. § 216B.241 subd. 5. that requires utilities to invest in projects that encourage the use of energy efficient lighting and reclamation and recycling of spent fluorescent and high intensity discharge lamps. Otter Tail Power met this requirement through its commercial and residential lighting programs.

Sustainable Buildings Certification

The Company has complied with Minn. Stat. § 216B.241, subd. 1f. part (c) that requires utilities to include in their ECO plans projects that facilitate professional engineering verification to qualify a building as ENERGY STAR labeled, Leadership in Energy and Environmental Design (LEED) certified, or Green Globes certified. The Company's Integrated Building Design Plus project facilitates sustainable building labeling and certification.

Sustainable Building 2030 Standards

The Company has complied with Minn. Stat. § 216B.241, subd. 9. part (e) that requires utilities to develop conservation improvement projects to support attaining energy efficiency goals consistent with Sustainable Buildings 2030 (SB 2030) standards. The Company's Integrated Building Design Plus project supports the SB 2030 standards.

Triennial Decision Requirements

The Company has complied with any additional requirements established in the Department's Deputy Commissioner's Decisions on December 1, 2023, and November 7, 2024.

Budget Modifications

On October 10, 2013, the Deputy Commissioner of the Department issued an Order giving utilities budget flexibility criteria by segment rather than individual program budgets. Under this requirement, utilities are required to provide a letter for permission to exceed the overall budget for a segment by 25 percent or more.

Otter Tail Power did not utilize the budget flexibility method for increasing budgets in 2024.

Measurement and Verification (M&V) Protocols for Large Custom ECO Projects

On July 23, 2008, the Deputy Commissioner approved M&V Protocols for Large Custom CIP Projects. The protocols apply to custom projects that have savings greater than one GWh and are initiated after April 1, 2008.

In 2023, Otter Tail Power had two custom projects under the Custom Efficiency Grant program estimated to save greater than one GWh. Otter Tail Power submitted Pre-M&V reports with the Department for approval in late December 2023. The project costs and associated savings for these two projects were included 2023. Otter Tail Power submitted Post M&V results for one project in October 2024. The savings result of the project fell within 10 percent of the original estimate and does not require a true-up. The second project was granted an extension to file a final M&V report. The equipment is a part of a larger expansion project that has not yet been completed. A Post-M&V report will be submitted to the Department in 2025.

ECO Employee Related Expenses

In its November 5, 2010, Order in Docket No. E017/M-10-220, the Commission agreed with and adopted the recommendations of the Department regarding reporting of employee expenses in utility status reports. The Department's recommendation included guidelines for public utilities to report employee related expenses that have been charged as ECO expenses. Public utilities must clearly identify all expenses in the four sections below:

- Travel expenses
- Employee meals
- Entertainment expenses, and
- Employee awards.

The Department further recommended, *"to limit the impacts on ratepayers, that these types of expenses remain a minor part of the overall annual budget or expenses, with a cap of 0.5 percent of total annual budgets or expenses."*

Otter Tail Power summarizes the Company's 2024 employee expenses as follows:

Section	Amount	Description
Travel Expense	$32,389	Travel expenses include mileage, rental vehicles, taxi services, and air fare for offsite meetings, customer site visits, and travel to training and conferences. All travel expenses are directly related to ECO program design, training, delivery, and promotion.
Lodging Expenses	$8,584	Lodging expenses include any lodging used for customer site offsite meetings, customer site visits, and lodging for training and conferences. All lodging expenses are directly related to ECO program design, training, delivery, and promotion.
Meal and Entertainment Expenses	$9,539	Meal and entertainment expenses include employee meals while attending offsite meetings, and meals while attending training and conferences. All meal and entertainment expenses are directly related to ECO program design, training, delivery, promotion, and review.
Conferences / Seminars / Trainings / Workshops	$44,057	Conferences / Seminars / Training / Contractor Workshop expenses consist of registration fees.
Miscellaneous Expenses	$0	Purchase of logo wear attire for employees while attending ECO public education forums and meetings.
TOTAL	$94,570	

Total 2024 employee expenses that were included in Otter Tail Power's ECO Tracker were $94,570. The total employee expense is 1.2 percent of the total 2024 ECO Tracker expenses of $7,895,824. Otter Tail Power believes a hard cap of 0.5 percent of ECO expenses is not reasonable when considering the 153 communities spread across 25,700 square miles of Minnesota service territory. Otter Tail Power customers are not located in clustered metropolitan areas. Otter Tail Power employees frequently travel hundreds of miles a day meeting with customers for the development and promotion of ECO. Otter

Tail Power continues to respectfully request the Department to consider these circumstances when reviewing Otter Tail Power's employee expenses.

Incorporation of the Average Savings Method (ASM) to account for Behavioral Savings

On April 26, 2012, in Docket Nos. E,G999/CI-08-133 and E017/CIP-10-356, the Deputy Commissioner of the Department of Commerce made a decision in how to count energy savings from behavioral projects in CIP programs and the Shared Savings Demand-Side Management Financial Incentive calculations. The Commissioner ordered Average Savings Method (ASM) proposed by Department Staff be used with a three-year minimum lifetime, effective with the 2014 program year.

Otter Tail Power has implemented the Deputy Commissioner's decision for calculating the energy savings for behavioral projects. The results have been incorporated in the energy savings results counted towards the 1.75 percent energy savings goal.

VI. RATE SCHEDULE

A redline and non-redline version of Otter Tail Power's proposed Section 13.02 Energy Conservation and Optimization (ECO) Rider Rate Schedule is included in the Conservation Cost Recovery Adjustment Section in this Petition. The changes include updates to the surcharge rates and administrative changes necessary to correct outdated references.

In addition, Otter Tail Power is taking this opportunity to replace retiree, Bruce G. Gerhardson with the name and title of the Manager of Regulation & Retail Energy Solutions, Stuart D. Tommerdahl, in the footer of this Rate Schedule.

VII. CUSTOMER NOTICE

Once approved by the Commission, the Company will be notifying its Minnesota customers of the updated ECO surcharge through an insert in the customers' bills. A surcharge notification will be included with each bill on the billing date following closest to November 1, 2025. An example of the customer notice is included in this filing as Appendix D. We will work with the Consumer Affairs Office as it relates to this customer notice.

VIII. CONCLUSION

Based on information provided throughout this filing, Otter Tail Power requests the following:

From the MPUC:

1. Approval of the 2024 DSM Financial Incentive, totaling $1,964,142.
2. The Company's proposal for a temporary financial incentive mechanism, for Otter Tail Power, at the same level of net benefits payout as the Company's ECO and Load Management energy savings net benefit payout, until a formal EFS financial incentive is approved by the Commission.
3. Approval of the 2024 ECO Tracker, resulting in a negative year-end balance of $3,194,439.
4. Approval to implement the Average CCRA factor of $0.00585/kWh reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered on and after November 1, 2025.
5. Approval of the administrative changes requested above to our ECO Rider.

From the Division of Energy Resources:

1. Approval of the individual 2024 ECO Projects, Evaluations, Energy and Demand Savings.
2. Approval of Otter Tail Power's response to various Department orders as indicated in the Miscellaneous Filing and Regulatory Compliance section of this filing.

If there are any questions concerning this filing, please contact Cristina Zuniga at (218) 739-8240 or czuniga@otpco.com.

Dated: April 1, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: */s/ CRISTINA ZUNIGA*
Cristina Zuniga
Retail Energy Solutions
Otter Tail Power Company
P.O. Box 496
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8240

Financial Incentive

FINANCIAL INCENTIVE

Otter Tail Power Company (Otter Tail Power, the Company) hereby submits this filing in compliance with the Minnesota Public Utilities Commission's (Commission, MPUC) January 27, 2010, Order Approving Demand Side Management (DSM) Financial Incentive Plans.[1]

The filing consists of the following items.

- Discussion of 2024 Financial Incentive
- Financial Incentive – Statutory Criteria
- Cost Comparisons / Net Benefits
- Request for Approval

Tables referenced in this Financial Incentive are located in Appendix A and include the following information.

Table 1	Calculation of Carrying Charge – 2024 ECO Tracker
Table 2	2024 Incentive Mechanism
Table 3	2024 Project Costs, Savings, and Benefits
Table 4	2024 Benefit Cost Ratios
Table 5	2024 ECO Program Status Report / ECO Tracker Recap
Table 6	2024 ECO Program Status Report – Costs per kW & per kWh

[1] Docket No. E,G999/CI-08-133.

DISCUSSION OF 2024 FINANCIAL INCENTIVE

The current shared savings financial incentive plan awards Otter Tail Power a share of the net benefits from investments in energy efficiency. The plan links the incentive to the utilities' performance in achieving cost-effective energy efficiency.

INCENTIVE CALCULATION

On January 24, 2024, the MPUC approved a modified shared savings model starting in 2024 and indicated the modified shared savings DSM incentive shall be in operation for the length of each utility's triennial Energy Conservation Optimization (ECO) plan.[2] Otter Tail Power's triennial plan is approved for 2024-2026. The MPUC approved modifications to Shared Savings Mechanism with the following points for the 2024-2026 triennium:

A. For all utilities, calculate the net benefits using the new Minnesota test (MCT) as outlined in the Department's March 31, 2023 decision in Docket No. E,G999/CIP-23-46, In the Matter of 2024-2026 CIP Cost-Effectiveness Methodologies for Electric and Gas Investor-Owned Utilities.

B. The societal discount rate of 3.3 percent is used in the calculation of net benefits to discount for future benefits and costs.

C. Set a net benefits cap of 5.5 percent for electric utilities.

D. Set a net benefits cap of 4.0 percent for gas utilities.

E. Set an expenditures cap of 20 percent for all utilities, which increases to 25 percent if the utility achieves the designated high achievement threshold.

F. For electric utilities,

    1) Set the minimum energy savings threshold where the utility is allowed to collect a financial incentive to 1.5 percent of retail sales.

    2) Set the high-achievement energy savings threshold to 2.2 percent of retail sales.

    3) When a utility achieves 1.5 percent of retail sales avoided, and for each additional 0.1 percent of retail sales avoided above the 1.5 percent minimum threshold, award the utility a percentage of net benefits consistent with Table 8 below.

[2] Docket E,G999/CI-08-133.

Table 8 – Electric Final

Savings Achievement -% of Retail Sales	% of Net Benefits Awarded
1.5% (threshold)	1.3%
1.6%	1.9%
1.7%	2.5%
1.8%	3.1%
1.9%	3.7%
2.0%	4.3%
2.1%	4.9%
2.2%	5.5% (cap)

G. For gas utilities,

1) Set the minimum energy savings threshold where the utility is allowed to collect a financial incentive to 0.7 percent of retail sales.

2) Set the high-achievement energy savings threshold to 1.2 percent of retail sales.

3) When a utility achieves 0.7 percent of retail sales avoided, and for each additional 0.1 percent of retail sales avoided above the 0.7 percent minimum threshold, award the utility a percentage of net benefits consistent with Table 9 below.

Table 9 – Gas Final

Savings Achievement -% of Retail Sales	% of Net Benefits Awarded
0.7% (threshold)	1.90%
0.8%	2.32%
0.9%	2.74%
1.0%	3.16%
1.1%	3.58%
1.2%	4% (cap)

H. For the treatment of load management programs that do not result in energy savings,

1) Calculate net benefits using the Minnesota test and include the net benefits in the total net benefits used to calculate the financial incentive.

2) Exclude all kW saved from load management programs that existed before May 25, 2021, from the benefits calculation.

The Commission determines that the following provisions from the current shared savings DSM financial incentive plan should be maintained:

A. Customers that have a statutory exemption from participating in conservation improvement programs shall not be allocated costs for the shared savings DSM financial incentive mechanism. Sales to these customers shall not be included in the calculation of utility energy savings goals.

B. If a utility elects not to include a third-party conservation improvement program, the utility cannot change its election until the beginning of subsequent years.

C. If a utility elects to include a third-party program, the program's net benefits and savings will be included in the calculation of the energy savings and will count toward the 1.0 percent savings goal for gas utilities and 1.75 percent savings goal for electric utilities.

D. The energy savings, costs, and benefits of modifications to non-third-party programs will be included in the calculation of a utility's DSM incentive.

E. The costs of any mandated, non-third-party projects (e.g., the 2007 Next Generation Energy Act assessments, University of Minnesota Initiative for Renewable Energy and the Environment costs) shall be excluded from the calculation of net benefits and energy savings achieved and incentive awarded.

F. Costs, energy savings, and energy production related to electric utility infrastructure costs, solar installation, and biomethane purchases shall not be included in energy savings for DSM financial incentive purposes.

The Commission approves the addition of the following provisions to the shared savings DSM financial incentive mechanism due to the implementation of the ECO Act:

A. As per Minn. Stat. § 216b.241 subd. 7(i), "[t]he costs and benefits associated with any approved low-income gas or electric conservation improvement program that is not cost-effective when considering the costs and benefits to the public utility may, at the discretion of the utility, be excluded from the calculation of net economic benefits for purposes of calculating the financial incentive to the public utility. The energy and demand savings may, at the discretion of the public utility, be applied toward the calculation of overall portfolio energy and demand savings for purposes of determining progress toward annual goals and in the financial incentive mechanism."

B. Both electric and gas utilities are allowed to count their expenditures on efficient fuel-switching and load management programs in calculation of their expenditures cap.

C. Gas utilities that have achieved energy savings at or above 1 percent of retail sales, excluding savings achieved through fuel-switching programs, are allowed to count net benefits and energy savings derived from their efficient fuel-switching programs towards calculating their financial incentive.

D. Electric utilities are not allowed to count net benefits and energy savings derived from their efficient fuel-switching programs toward calculating their incentive.

E. Both electric and gas utilities that have achieved energy savings at or above 1 percent of retail sales, excluding savings achieved through load management programs, are allowed to count the increased net benefits and energy savings derived from their load management programs that occurred on or after the approval of the Energy Conversation and Optimization Act (May 25, 2021) towards calculating their financial incentive.

As part of this April 1, 2025, filing under section II, the Company is providing the 2024 proposed incentive. The following steps are used in the incentive calculation:

1. The 2024 incentive is calculated and detailed in Appendix A, Table 2.
2. At year-end, the utility calculates the net benefits for ECO projects based on actual participation and costs. The net benefits are the Minnesota Test Benefits less total ECO costs, including both direct and indirect programs.
3. Appendix A, Table 3 lists the 2024 ECO Programs, each as proposed and approved by the Department, and each with actual 2024 results. Also listed are total program costs, resulting benefits, and net benefits for each program and as a total ECO Portfolio.
4. Actual energy savings was 49,804,641 kWh, excluding the Company's Publicly Owned Property (POP) Solar program's allocated savings, or 3.1 percent of historic average retail sales.[3] ECO costs totaled $7,895,824. The Company's total net MCT benefits are calculated to be $33,963,044, excluding assessments, Efficient Fuel Switching (EFS), and POP Solar.[4] The 2024 results for energy savings, costs, and net benefits are entered in the post-year financial incentive tool as shown in Appendix A, Table 2.

[3] Contains savings from EFS measures.

[4] Contains the $1,867,967 requested financial incentive.

5. Appendix A, Table 4 outlines the benefit/cost ratios for each 2024 program. Figures are listed for each project "as filed" as part of the 2024-2026 ECO Triennial Filing and "as actual" reflecting 2024 actual participation, savings, and costs.
6. As detailed in Appendix A, Table 2, the total incentive amount achieved in 2024 is $1,867,967.

FINANCIAL INCENTIVE – STATUTORY CRITERIA

Minn. Stat. §216B.16, subd. 6c(b), sets forth four statutory criteria with respect to approval by the Minnesota Public Utilities Commission of utility financial incentive plans for energy conservation improvements. In approving incentive plans, the Commission shall consider:

1. whether the plan is likely to increase utility investments in cost-effective energy conservation.
2. whether the plan is compatible with the interest of utility ratepayers and other interested parties.
3. whether the plan links the incentive to the utility's performance in achieving cost-effective conservation.
4. whether the plan is in conflict with other provisions of this chapter.

Consistent with the Commission's January 27, 2010, Order Approving Demand Side Management Financial Incentive Plans in Docket No. E,G999/CI-08-133, the following discussion describes how Otter Tail Power's proposed 2024 Demand Side Management financial incentive in the present docket is consistent with each of these statutory criteria.

Otter Tail Power's financial incentive mechanism is consistent with the considerations set forth by the Commission as follows:

1. Increase investments: The incentive mechanism encourages increased utility investment in cost-effective conservation, recognizing higher incentives for greater net benefits.
2. Interest of ratepayers and others: The current mechanism is in the interest of ratepayers because it awards utilities a percentage of net benefits achieved. The mechanism does not award the incentives for simply complying with statutory spending, but encourages additional cost-effective energy-efficiency investment, which is in the ratepayer's interest.
3. Links incentive to performance: The current incentive is a shared savings

mechanism that awards utilities a share of the net benefits from investments in energy efficiency. There is a direct link between the amount of the incentive and the utility's performance of achieving cost-effective efficiency. As cost-effectiveness increases, net benefits increase, and thus, the incentive increases until the utility reaches the expenditure cap.

4. Conflict with other provisions: Otter Tail Power does not believe the current incentive conflicts with other provisions of law. It does not result in unjust or unreasonable rates since the mechanism awards for cost-effective energy efficiency at a cost less than supply side options.

COST COMPARISONS / NET BENEFITS

In 2024, Otter Tail Power's average first year cost per kWh saved was 16 cents, which is in line with the five-year average of 14 cents. As noted in Figure 1, the average first year costs per kWh range have remained relatively consistent.

Figure 1: History of Otter Tail's CIP/ECO Achievements, Tracker, and Incentives (2020-2024)

	2020	2021	2022	2023	2024
DSM Financial Incentive	$2,864,948	$2,900,388	$2,414,490	$2,705,283	$1,867,967
CIP/ECO Expenditures	$9,643,680	$9,381,509	$7,696,226	$7,729,380	$7,895,824
Achieved Energy Savings (kWh)	70,649,612	68,779,250	50,557,160	61,444,189	50,321,324
Average Cost per kWh Saved	$0.14	$0.14	$0.15	$0.13	$0.16

NET BENEFITS

The definition of "net benefits" used in the financial incentive calculation is the total MN benefits less the total MN costs for the entire ECO portfolio for a single year. These figures are derived from a single year (2024) benefit/cost analysis using DSMore™ software. The MN benefits are aggregated for the lifetime of all ECO energy efficiency measures, discounted back to 2024 dollars using the discount rate of 3.3 percent.

As shown in Table 3 of Appendix A, the estimated net benefits for the 2024 Proposed ECO are $38,043,006. Additional details of the total costs and the total benefits from benefit/cost analysis of the 2024 Proposed ECO portfolio include:

Figure 2:

Program Costs - Proposed 2024	
Delivery/Implementation/Administration Costs	$4,210,817
Incentives	$6,031,300
Financial Incentive	$2,930,176
Total Costs	$13,172,293
Program Benefits - Proposed 2024*	
Avoided T&D Electric	$3,323,875
Cost-Based Avoided Electric Production	$16,301,840
Cost-Based Avoided Electric Capacity	$16,155,888
Environmental	$18,668,984
Total Benefits	$54,450,587
Net Benefits - Proposed 2024	$41,278,294
Benefit/Cost Results - Proposed 2024	4.13

* Benefits are based on lifetime benefits, discounted back to 2024 dollars using 3.3 percent discount rate.

Additional details of the total costs and the total benefits from the DSMore analysis of the 2024 Actual ECO portfolio include:

Figure 3:

Program Costs - Actual 2024	
Delivery/Implementation/Administration Costs	$3,069,497
Incentives	$4,826,327
Financial Incentive	$1,867,967
Total Costs	$9,763,791
Program Benefits - Actual 2024	
Avoided T&D Electric	$1,820,658
Cost-Based Avoided Electric Production	$15,996,805
Cost-Based Avoided Electric Capacity	$10,123,071
Environmental	$17,998,296
Total Benefits	$45,938,830
Net Benefits - Actual 2024	$36,175,039
Benefit/Cost Results - Actual 24	4.71

* Benefits are based on lifetime benefits, discounted back to 2024 dollars using 3.3 percent utility discount rate.

Figure 4:

ECO Cost Breakdown - 2024				
	Proposed Costs		**Actual Costs**	
Delivery	$4,210,817	41%	$3,069,497	39%
Incentives	$6,031,300	59%	$4,826,327	61%
Total ECO Costs	$10,242,117	100%	$7,895,824	100%

SUMMARY OF PROPOSAL

Otter Tail Power's 2024 ECO energy savings far surpassed Minnesota's energy savings goal of 1.75 percent and finished at 3.11 percent of historical sales. The MPUC's January 25, 2024, Order adopting Modifications to Shared Savings Demand-Side Management Financial Incentive Plan reaffirmed the basis of the utility's financial incentive is to share the net benefits from the conservation programs between customers and the utility. For 2024 ECO results, the utility was eligible to receive 5.5 percent of the total net benefits delivered to its customers. Since the 2024 ECO energy savings exceeded 2.2 percent of the Company's historic sales, the Company qualifies to increase the expenditure cap from 20 percent to 25 percent. Applying these factors Otter Tail Power is eligible for a $1,867,967 financial incentive.

Otter Tail Power's proposed 2024 financial incentive is consistent with Minn. Stat. §216B.16, subd. 6c(b), since it supports an increase in cost-effective utility investments, links the utility's performance to achieving cost-effective conservation, and does not conflict with other provisions of Minn. Stat. §216B.16.

EFFICIENT FUEL SWITCHING PERFORMANCE BASED FINANCIAL INCENTIVE

Otter Tail Power proposes to the Commission, a performance based financial incentive for its 2024 EFS Program activities. The Company proposes a performance based financial incentive in the amount of $96,175 for 2024 EFS activities.

STATUTORY BACKGROUND

The 2024 Minnesota Legislature approved updates to the 2021 Energy Conservation and Optimization Act, placing an emphasis on efficient fuel-switching by rewarding utilities with a financial incentive to encourage customers to reduce emissions by switching their appliances and other technologies to electric. The legislation grants the Commission the

authority to approve, modify, or reject, a financial incentive proposal brought by a utility which encourages efficient fuel-switching programs.[5]

Otter Tail Power reviewed the statutory requirements for ECO programs, including EFS, and believes its efficient fuel switching financial incentive proposal meets all statutory requirements.[6] Otter Tail Power's financial incentive proposal is supported by its cost-effective EFS programs that were approved by the Deputy Commissioner of Department of Commerce's Division of Energy Resources (Department) as proposed in its 2024-2026 ECO Portfolio and the 2024 results presented as a part of this filing.[7] Otter Tail Power's proposal will incentivize the utility's continued investment in emission reduction, aligns with the interest of customers and other stakeholders, ties to the utility's cost-effective program performance, and is supported by the statutory provisions.

As a part of the ECO act revisions, the Legislature issued a December 31, 2032, sunset on incentives for electric utility fuel-switching programs.[8] This language is an indication, from the Legislature, requesting immediate action from utilities to pursue decarbonization through EFS or electrification activities in Minnesota. In response to legislature's request, Otter Tail Power presented and delivered an aggressive EFS portfolio, including four programs in which all customers are eligible to participate.

PERFORMANCE BASED EFS FINANCIAL INCENTIVE PROPOSAL

The EFS financial incentive was passed by the legislature and Governor in the spring of 2024. However, there has not been a formal determination on how a financial incentive for EFS should be structured. Otter Tail Power, along with other Stakeholders and Utilities have met with the Department as a part of an ongoing series of meetings to discuss technical guidance of the 2024 EFS ECO changes. However, it is the Company's understanding, the official calculation and proposal of an EFS financial incentive mechanism proposal is not slated to be filed by the Department in a separate docket for 2024-2026 utility EFS performance but instead will be filed with the intent to capture the performance and implementation of 2027-2029 ECO Triennial filings.

Otter Tail Power proposes to the Commission, in this docket, a temporary annual financial incentive mechanism for its EFS activities included in its 2024-2026 Portfolio. Otter Tail Power proposes than any mechanism approved in this docket remain in place until stakeholders work through a formal process and gain Commission approval of an

5 Sec. 216B.241 MN Statutes Subd. 11(c)
6 Sec. 216B.16 MN Statutes Subd. 6(c) paragraphs (b) and (c)
7 Docket No. E017/CIP-23-094
8 Sec. 216B.16 MN Statutes Subd. 6(c) paragraph (d)

alternative EFS financial incentive mechanism. The proposal is consistent with the shared savings mechanism used for traditional energy efficiency activities which applies a percentage to the net benefits of Load Management and traditional ECO programs. The Company has calculated its net benefits from 2024 efficient fuel switching activities and has applied the payout rate of 5.5 percent of EFS net benefits, the same rate that was used for the Company's traditional ECO financial incentive.

Applying the 5.5 percent payout rate to its 2024 EFS MCT net benefits of $1,748,635 is $96,175. This proposed financial incentive is significant to the Company to ensure the Company can maintain the resources focused on EFS activities, while still having a small impact on Otter Tail Power's customers' monthly bills.

Otter Tail Power has included Figure 5 to illustrate the impact its 2024 EFS activities are having on the environment. This is the first year Otter Tail Power is able to recognize these fossil fuel savings, and with a Commission approved incentive, the Company looks forward to growing these savings further.

Figure 5: 2024 EFS Results

Fuel Volumes Displaced	
Total Propane (gallons)	51,586
Total natural gas (MCF)	4,197
Total gasoline (gallons)	16,978
Total Fuel Oil (gallons)	3,142
Total Emissions Displaced	
Total CO2 emission (Metric Tons)	274

CONCLUSION

Otter Tail Power proposes this financial incentive in direct response to the 2024 Legislature's direction to accelerate decarbonization through EFS activities as a part of Minnesota utility's ECO portfolios. Otter Tail Power responded to the Legislature's original ECO request, when not all utilities took on the incitive, and as outlined by statute should receive a financial incentive for its efforts and resources that were focused on developing and producing a successful 2024-2026 EFS portfolio. Otter Tail Power proposes to the Commission, in this docket, a temporary financial incentive mechanism for Otter Tail Power EFS activities that complies with statutory requirements and is consistent with the shared savings mechanism used for ECO and Load Management activities.

REQUEST FOR APPROVAL

Otter Tail Power respectfully requests the MPUC to approve:

1. The 2024 ECO performance financial incentive amount of $1,964,142 to be recoverable through its ECO Tracker Account. This amount includes two components:
    a. A performance incentive amount of $1,867,967 for ECO and Load Management (non-EFS) activities.
    b. The Company's EFS financial incentive proposal of 5.5 percent of MCT net benefits for 2024 EFS performance in the amount of $96,175.

2. The Company's proposal for a temporary financial incentive mechanism, for Otter Tail Power, at the same level of net benefits payout as the Company's ECO and Load Management energy savings net benefit payout, until a formal EFS financial incentive is approved by the Commission.

If there are any questions concerning this filing, please contact Cristina Zuniga at (218) 739-8240 or czuniga@otpco.com.

Dated: April 1, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

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Status Report

Status Report

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STATUS REPORT – 2024 ECO PROGRAMS

The 2024 Energy Conservation Optimization (ECO) Status Report has been combined with the 2024 Financial Incentive Filing, produced annually on April 1. The Status Report covers all 2024 programs, including direct impact, indirect impact, and miscellaneous programs. Participation, program costs, and energy and demand savings for all programs are outlined in Appendix A, Table 5. The programs described in this Status Report are approved for the 2024 ECO Plan unless stated otherwise.

Direct Impact Conservation Programs

Residential

- Home Appliance
- Home Direct Install
- Home Energy Feedback
- Home Energy Management
- Home Heating and Cooling
- Home Lighting
- Residential Code Support

Low-Income

- House Therapy
- Low-Income Home Energy Feedback

Commercial

- Commercial Audits and Studies
- Commercial Direct Install
- Commercial Energy Management
- Commercial Heat Pumps
- Commercial Lighting
- Commercial & Industrial Focused Efficiency
- Compressed Air Efficiency
- Custom Efficiency Grants (Custom Projects)
- Drive Power
- Refrigeration
- Commercial Code Support

Other

- Publicly Owned Property (POP) Solar
- Emerging Technology Accelerator

Load Management Program

Indirect Impact Conservation Programs / Regulatory Requirements

- Advertising & Education
- Financing
- Implementation & Training
- Integrated Building Design Plus
- Program Development
- PUC / Regulatory (NGEA) Assessments
- Transmission & Distribution Cost Study

Miscellaneous / Inactive Program Costs

- Accounting Adjustments
- Otter Tail Power ECO Projects
- Carrying Charges

DIRECT IMPACT – RESIDENTIAL

HOME APPLIANCE

The Company's Home Appliance program continued to offer customers an incentive to recycle inefficient but operating refrigerators, freezers, dehumidifiers, and window air-conditioning units at no cost to the customer. During a scheduled visit to recycle a refrigerator and/or freezer, customers may also recycle a window air-conditioner and/or dehumidifier. In 2024, we continued to offer eight LED bulbs in addition to the recycling incentive for participants. This additional benefit has helped retain customer interest in the program and is reflected in steady program participation. We will continue to provide the additional LED bulb incentive in 2025.

The Home Appliance program also offered customers rebates for purchasing new standard-sized Energy Star® rated home appliances, including:

- Refrigerators
- Freezers
- Dishwashers
- Clothes washers
- Clothes dryers, including heat pump clothes dryers
- Induction cooktops
- Dehumidifiers
- Air purifiers
- Heat pump water heater

Otter Tail Power promoted the Home Appliance program using various resources including:

- Bill inserts targeting residential customers.
- Print advertising.
- Webpage content including hero ads placed on the Company's home page.
- Program, rate, and rebate pages within the Company's Ways to Save section of the website.
- Digital billboards.
- Bill messages.
- Inclusion, as appropriate, on Home Energy Reports mailed and emailed to customers through the Energy Feedback and Low-Income Energy Feedback programs.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Home Appliance Program	**Actual**	**Proposed**	**% of Goal**
Participation	1,118	829	135%
Budget $	$170,601	$183,000	93%

Evaluation Methodology

Energy savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Appliance Program	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	315,180
Demand Savings – kW	40.61

HOME DIRECT INSTALL

The Company's Home Direct Install program consisted of the previously approved residential Home Transformer and School Kit programs. The Home Direct Install program aimed to identify and assist customers in reducing energy loss and waste in their home and to save energy and money through installation of low-cost efficiency improvement measures. The Company reached the market for these improvement measures through the following distribution strategies:

1. Direct install kits distributed to customers at the time a free audit is provided through Home Transformer residential energy audits.
2. Multifamily housing outreach efforts to target this segment with free assessments and low-cost efficiency measures free to residents.
3. Home direct install kits distributed to students in conjunction with an energy efficiency lesson plan targeting 5th grade students in participating schools.

Home Transformer

Through Home Transformer, the Company offered customers with electric space and water-heating homes an energy audit and installation of select energy-efficiency measures at no cost to the customer. Products and services offered include:

- An energy audit including a blower door test and thermal imaging analysis.
- A detailed report on audit findings, including recommendations for energy saving measures with estimated costs, annual savings, and simple payback for each measure.
- Efficiency products, installation demonstration, and education.
    - Electric measures – LED bulbs and a Tier 2 power strip.
    - Heating and cooling measures – exterior door sweep, outlet gaskets, caulking, weather-stripping, and plastic film insulating kits for windows.
    - Water heating measures – pipe insulation, low-flow showerhead, faucet aerators, and temperature assessment of the water heater.

Otter Tail Power relied on a local community action agency for the technical expertise needed to provide professional home energy audits, reports, and direct installs of energy efficiency measures.

Additionally, Otter Tail Power partners with Minnesota Energy Resources Corporation (MERC) to provide audits and direct-install of energy saving measures for customers in single-family homes with natural gas as their primary heat source. The partnership allows

both utilities to more cost effectively offer audits and direct install measures for our mutual customers.

Through contracted service providers, the Company completed outreach targeting multifamily housing complexes in 2024, successfully reaching one income-qualified unit in Bemidji, MN and provided audit and direct install services. The Company completed outreach targeting multifamily housing late in 2024, with efforts resulting in future assessment and direct install measure installations being scheduled in four properties totaling 112 individual housing units in 2025.

School Kit Distribution

The Home Direct Install program offered home energy efficiency products and educational materials to fifth grade students throughout Otter Tail Power's service area. Otter Tail Power implemented lesson plans and kit distributions using AM Conservation Group, a contracted third-party.

AM Conservation Group representatives successfully completed outreach by contacting schools throughout our service territory that teach school age children of Otter Tail Power customers. AM Conservation Group ordered school kits, assembled in reusable tote bags, and shipped the required inventory to participating schools. Kits included: a Tier 2 power strip, six 9-Watt LED Energy Star® bulbs, two faucet aerators, a high efficiency showerhead, weatherization measures, and a digital thermometer for a refrigerator. The kits also included information about the products and installation instructions.

Through the Home Direct Install program, teachers at participating schools received lesson plans and an instruction guide to integrate into their curriculum. Participating students received a workbook and study guide that supported the teacher's lesson plans and instruction guide. All teachers participating in the program reported they would recommend participation in the program to their peers.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Home Direct Install	**Actual**	**Proposed**	**% of Goal**
Participation	16,831	16,850	100%
Budget $	$150,963	$137,000	110%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Direct Install	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	1,389,044
Demand Savings – kW	121.37

HOME ENERGY FEEDBACK

The Energy Feedback program consisted of two components: an online energy feedback tool and the Opower Home Energy Report (HER) component. These behavior-based programs are designed to maximize energy savings achieved through behavior changes as a result of providing customers personalized and comparative energy use information.

The online energy feedback tool is an opt-in program option that is accessed with a secure sign-in to our web portal on the Otter Tail Power website. The HER component of the program is designed as an opt-out program and provides direct mail delivery of up to four comparative energy usage reports to participating Minnesota residential customers each year. Customers who have provided Otter Tail Power with an email address are also eligible to receive a monthly email home energy report (eHER).

Online Energy Feedback Tool

In 2024 and early 2025, Otter Tail Power and Accelerated Innovations developed and are currently executing the following scope of work to maximize verified behavioral energy efficiency savings from engagement with the My Account experience. The scope of work covers three primary areas that coincide with Otter Tail Power's rollout of AMI metering and optional Otter Tail Power-branded native mobile app to maximize participation and end customer engagement:

1. Actions Content Development and Implementation
   By enabling and configuring content through the MyMeter Actions module, Accelerated Innovation will support Otter Tail Power in engaging My Account users with recommendations and guidance on targeted no/low-cost actions that can lead to energy and cost savings. Accelerated Innovation will develop and implement a plan to manage Actions content, track user engagement and coordinate with the Company to promote additional Otter Tail Power offerings via the Actions user interface and related in-portal content areas including Dashboard widgets, notifications, and content overlays.

2. Enhanced New Bill Notification and Weekly Summary Communications Content
   As a core outbound communications engagement approach, Accelerated Innovation will develop and deliver enhancements to the New Bill Notification and Weekly Summary email templates to promote targeted energy-saving action recommendations, provide feedback on energy usage trends, and (if made available) incorporate usage disaggregation insights.

3. Third-Party Impact Evaluation
   In coordination with Otter Tail Power, Accelerated Innovation will engage a leading behavioral program evaluation services provider to complete annual impact evaluations to meet Minnesota Department of Commerce Division of Energy Resources (Department) requirements for claimed savings as part of the Company's ECO plan.

Home Energy Reports

The HER program component delivered comparative energy use information to selected Minnesota residential customers. HERs contain various personalized components, including:

- Comparisons of recent energy use to comparable nearby homes.
- Comparison of past energy use to current use over time.
- Energy efficiency tips based on the home's energy use pattern, season, and household heating type.
- Spanish-translated reports were made available upon request in 2024.

Participation in the HER component is defined as any Minnesota residential customer that received one or more personalized HERs during 2024. Participation in the HER program in 2024 was 29,860 with additional Minnesota residential customers participating through the Low-Income HER (LI HER) program. The LI HER program is described in more detail in the Low-Income Energy Feedback program section of this report.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Energy Feedback	**Actual**	**Proposed**	**% of Goal**
Online Energy Analysis[1]	0	4,500	0%
Opower HER Participation	29,860	29,000	103%
Budget $	$220,387	$340,000	65%

Evaluation Methodology – HER

The 2024 evaluation of energy savings for the HER program was completed by Opower using integrated data from a variety of sources that allow for detailed analysis of energy

[1] Participation and savings not claimed in 2024. Online tool in development.

savings. The evaluation report is included in Appendix B – Third Party Evaluations. The data utilized by Opower included:

1. Consumption Data
   Otter Tail Power provided weekly updates of monthly consumption data for all households in the program, including historical consumption information.

2. Parcel Data
   Opower received, to the extent available from a third-party vendor, data about household parcels, including home size, age and value, heating and cooling type, as well as pool and hot tub data. These data elements are static with the exception of square footage, heating and cooling type, and pool and hot tub data, which may be updated at the customer's request.

3. Demographic Data
   Opower received, to the extent available from a third-party vendor, demographic data about participants, including household income, number of occupants, age of occupant(s), and an owner/renter indicator. These fields were used to recommend customized energy efficiency tips to customers by using relevant demographic targeting. Household size may be updated at the customer's request.

Opower's analysis of the HER program relies upon a fixed-effects regression model. This statistical methodology is standard procedure for the analysis of controlled experiments and is a well-accepted practice within the energy efficiency program measurement and verification (M&V) community. This methodology and analysis closely resemble the "Large Scale Data Analysis" techniques described in the Model Energy Efficiency Program Impact Evaluation Guide from the National Action Plan on Energy Efficiency.

In 2016, updates were made to the Modeled Savings Methodology to improve the accuracy of the reporting. These changes included:

- Establishing the relationship between the monthly savings rate and the cumulative number of print reports received per person in the wave up to that month.
- Applying the forecasted savings rate in each month to the usage of the modeled wave.
- Adapting the algorithm to apply to rolling enrollment waves.

Otter Tail Power received approval from the Department on October 7, 2016, to apply a revised Modeled Savings Methodology to calculate energy savings.

Overall adjusted energy savings associated with the HER and LI HER programs in 2024 totaled 13,019.01 MWh, equal to an average 330.43 kWh per participant household. Otter Tail Power has reduced its claimed savings to reflect the standard HER program savings below.

Energy Savings and Adjustments

In accordance with the Decision of the Department, these full savings are used in calculating the net benefits and cost effectiveness of the Energy Feedback program. For 2024, the energy savings associated with behavioral change has been reduced by two-thirds, based on the Decision by the Deputy Commissioner of the DER.[2]

ENERGY AND DEMAND RESULTS – 2024	
Online Energy Analysis[3]	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	0
Demand Savings – kW	0

ENERGY AND DEMAND RESULTS – 2024	
Opower Home Energy Reports	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	3,673,982
Demand Savings – kW	1,526.37

ENERGY AND DEMAND RESULTS – 2024	
Energy Feedback Combined Results	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	3,673,982
Demand Savings – kW	1,526.37

[2]April 26, 2012, Docket Nos. E,G999/CI-08-133 and E017/CIP-10-356.
[3] Participation and savings not claimed in 2024. Online tool in development.

HOME ENERGY MANAGEMENT

The Company's Home Energy Management program consisted of the residential Air Conditioning Control program (CoolSavings) that includes cycled control of central air-conditioning systems and heat pumps, and the Water Heater Program that promotes control of water heaters.

Through CoolSavings the Company targets residential customers with central air conditioning. Customers are encouraged to enroll in the program and receive a $8.25/month credit for each of the four summer months (June-September). During a control event, cooling systems are cycled 15 minutes on and 15 minutes off for the duration of the control period, which can occur during the summer season, June through September.

Controlled water heating storage is one of Otter Tail Power's largest residential direct load management programs. Controlled water heating gives participating customers a discounted rate or bill credit in exchange for allowing the Company to curtail their water heater operation during peak and high energy price periods. During a control event, water heaters are interrupted for the entire duration of the control period, which can occur at any time of the year.

Otter Tail Power promotes Home Energy Management using various resources including:

- Radio advertising campaigns.
- Digital and social media advertising campaigns.
- Digital billboards.
- Bill inserts.
- Bill messages.
- Bill return envelopes.
- Training sessions with community action agencies contracted to implement House Therapy.
- Customer care booklet provided to all new customers.
- *Programs and Services Guide* provided to contractors and employees.
- Program, rate, and rebate pages within the Company's Ways to Save section of the website.

In 2024, Otter Tail Power called controlled air conditioning events on 13 days totaling 22 hours and 12 minutes. This control time is within the 300-hour control limit in the air

conditioning rate tariff. Water heaters were controlled approximately 139 hours and 35 minutes in 2024 over 220 days. Water heater control events are based on price signals and aim to maximize savings for all customers.

Participation and Budget

Otter Tail Power initially filed the Water Heating program in its 2014 to 2016 CIP triennial plan with 100 percent residential participation. The program now has a ratio of 95 percent residential and 5 percent commercial. Otter Tail Power has included participation data for both classes in this section of the Status Report. Coolsavings remains at 100 percent residential participation.

PARTICIPATION AND BUDGET – 2024			
Home Energy Management	**Actual**	**Proposed**	**% of Goal**
Participation	18,691	18,906	99%
Budget $	$87,658	$116,000	76%

Evaluation Methodology

Energy savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Energy Management	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	403,646
Demand Savings – kW	10,188.57

HOME HEATING AND COOLING

The Company's Home Heating and Cooling (HHC) program provided incentives for efficient air-source and geothermal heat pumps, Energy Star® air conditioners, envelope insulation and air sealing, Energy Star® windows, and smart thermostat installations.

Heat Pumps and Energy Star® Air Conditioners

The heat pump component targeted residential customers currently using or considering the installation of less efficient electric resistance heating and cooling systems by offering rebates for high-efficiency air source or geothermal heat pumps. The Company applies Energy Star® qualifications and federal 25C tax credits as reference guides for setting equipment efficiency requirements for air-to-air and geothermal heat pumps. The Company utilizes the criteria set by Efficiency Vermont for the air to water heat pump as this emerging technology does not currently have an Energy Star® qualification standard reference.

In 2024, air source heat pumps and Energy Star® air conditioners met the following minimum rating requirements. As presented in the Company's September 2024 modification filing, higher tier cold climate heat pump efficiency requirements will continue to increase to remain consistent with requirements for 25C tax credits to ensure simplicity for customers and contractors.

	SEER2	HSPF2	COP*
Energy Star AC	> or = 15.2	-	-
Standard heat pump	> or = 14.3	> or = 7.5	-
CCHP - Ductless	> or = 16.0	> or = 9.5	-
CCHP – Ducted	> or = 15.2	> or = 8.1	-
Air to Water (AWHP)	-	-	> or =1.7

*COP rating at A5W110 (At an outdoor ambient temperature of 5°F, the unit must deliver 110°F supply water.)

In 2024, geothermal heat pumps met the following minimum rating requirements.

Geothermal Heat Pumps			
Type	**Loop Type**	**COP**	**EER**
Water to air	Open loop	4.1	21.1
Water to air	Closed loop	3.6	17.1
Water to water	Open loop	3.5	20.1
Water to water	Closed loop	3.1	16.1
Direct exchange	-	3.6	16.0
GHP single unit ≥ 6 tons	-	3.1	13.0

The Company provided an additional rebate for customers electing to add a buffer tank with a heating coil or a desuperheater option to their heat pump to provide preheating of domestic hot water. This rebate is limited to a maximum of 20 tons per customer.

Quality Installation

New for 2024, the Company developed a program to recruit contractors for the Quality Installation rebate program. This program's focus is to identify contractors who have gone above standard licensing requirements and have taken additional classes or have certifications focused on heat pump technology best practices. Eligible certifications and trainings include North American Technician Excellence (NATE), Minnesota Air Source Heat Pump Collaborative Preferred Contractor Network, Manufacturer or distributor sponsored training, or other pre-approved training. The Company approved 94 contractors with 389 total staff technicians in 2024. Engagement outreach for this program has included promotion in the annual program and service guide, contractor workshops, and follow up with non-participating contractors as applications are submitted by customers. This program allowed Otter Tail Power to gain valuable insight into the number of contractors serving within the Company's service territory and has led to improved dialogue and outreach initiatives with contractors.

Equipment Tune-Ups

New for 2024, the Company offered rebates for equipment tune-ups that included coil cleaning, refrigeration charge check, air filter cleaning, and air flow measurement and correction if not done by homeowner or contractor at equipment installation. This program offered a great opportunity and reminder for customers who often forget or neglect their heating and cooling systems until it stops working. The program also offered a great opportunity for contractors to have some discussions on possible future options if it was identified equipment is reaching end of life and repair parts might no longer be available if failure were to occur. These conversations are valuable in getting customers to start thinking about what system they might want to install in the future, begin budgeting, and seeing what rebates might be available. This is in contrast to waiting for equipment failure and then having rushed decision making without reviewing all options on the market. The Company rebated 41 heat pump customers and 70 A/C customers whose equipment had an average age of 16 years.

Home Insulation

Recognizing the importance of an efficient building envelope, the Home Heating and Cooling program targets residential customers with primary electric heat by offering rebates for contractor-installed weatherization and insulation measures and new in 2024, Energy Star® Northern Climate Zone windows.

Smart Thermostats

The smart thermostat component offers rebates to customers who buy and install a qualified Tier II or Tier III thermostat. Tier II thermostats are communicating thermostats that give users access to setpoints and the ability to schedule changes from anywhere using a smart device including a mobile phone, tablet, or computer. Tier III thermostats are analytics-capable thermostats that offer energy saving features in addition to those of the Tier II thermostats, including coaching, heating, ventilation, and air conditioning (HVAC) diagnostics, comparative information, and geofencing. The tier level and the type of heating system determined the level of rebate a customer received. A customer without primary electric heating but with a central cooling system is eligible for a lesser rebate.

Otter Tail Power promotes Home Heating and Cooling using various resources including:

- *Programs and Services Guide* provided to contractors and employees.
- Media campaigns including television, radio, and social media.
- Bill messages.
- Bill inserts.
- Digital billboard.
- Program, rate, technology, and rebate pages within the Company's Ways to Save section of the website.
- Hero spots on the home page of the website.
- Modules on HERs mailed to customers through the Energy Feedback program.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Home Heating and Cooling	**Actual**	**Proposed**	**% of Goal**
Participation	1,013	1,176	86%
Budget $	$1,166,518	$915,600	127%

Evaluation Methodology

Energy savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Heating and Cooling	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	5,973,867
Demand Savings – kW	655.05

HOME LIGHTING

The Company's Home Lighting program is designed to help transform the residential lighting market through three strategies:

1. Funding for upstream incentives to reduce prices of Energy Star® LED lamps at the point of purchase for consumers at participating retail stores.
2. Rebates for retrofits of inefficient, hard-wired light fixtures to LED technology.
3. Rebates during new home construction for installation of hard-wired LED light fixtures.

Upstream Incentives

Through the services of a third-party service provider, Otter Tail Power offers upstream incentives for Energy Star® lighting products with the following objectives:

- Leverage manufacturer dollars for instant consumer rebate incentives averaging approximately $1.84 per LED bulb.
- Leverage advertising dollars for retailers.
- Highlight Otter Tail Power's sponsorship of the promotions through press releases, in-store displays, special public relations events, and LED bulb sales.
- Implement the program with seamless coordination with other Energy Star® Lighting promotions throughout Minnesota and the Midwest.

There were 40 retailers in our service territory that participated in the 2024 campaign, contributing to distribution of approximately 119,329 bulbs.

Otter Tail Power promotes the Home Lighting program using various resources including:

- Bill inserts.
- *Programs and Services Guide* provided to contractors and employees.
- Program, rate, and rebate pages within the Company's Ways to Save section of the website.
- Modules on Home Energy Reports mailed and emailed to customers through the Energy Feedback program.
- Media campaigns including television, radio, and social media.
- LED lighting factsheets available upon request.
- Special promotional events with three participating retail stores, including live radio remotes highlighting the benefits of LEDs and special pricing on LED

lamps available through Otter Tail Power's program. The events paired nicely with the retail stores' customer appreciation events and were well attended by local customers.

Other promotions included the following:

- The Company provided eight LED bulbs to each participant who recycled an appliance through the Home Appliance program. This extended customer education about LED bulbs and increased total bulb distribution.
- The Company collaborated with local nonprofit organizations to distribute 1,872 LED holiday light strings through the fall of 2024. LED holiday strings were distributed to customers in exchange for nonperishable food items, toys or cash donations to the nonprofit organizations. The Company organized and staffed these events in Bemidji and Fergus Falls. Results included approximately 606 pounds of food donated, $511 in cash donations to benefit local food shelves along with 165 toy donations for the United Way Holiday Toy Program.
- In a separate collaboration with community food shelves, Otter Tail distributed 3,200 LED night lights and 7,176 four-packs of LED bulbs to local food shelves, who then included these in orders for food shelf clients through normal business operations.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Home Lighting	**Actual**	**Proposed**	**% of Goal**
Participation	127,780	187,765	68%
Budget $	$511,854	$657,000	78%

Evaluation Methodology

Energy savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Lighting	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	2,694,184
Demand Savings – kW	204.86

RESIDENTIAL CODE SUPPORT

In collaboration with four other Minnesota electric and gas utilities, Otter Tail Power contributed resources to the Minnesota Energy Code Support Program's codes and standards compliance initiative.[4] This proactive effort supports communities across Minnesota in improving commercial building energy code compliance. By providing resources and guidance, the utilities help communities throughout Minnesota understand and adhere to building codes in new construction projects, ultimately aiding them in achieving their energy performance and economic development goals.

Activities completed by the Minnesota Energy Code Support Program consultant included training, circuit rider outreach, development of technical documents and resources, and other general activities and meetings to support the program. Specific achievements in these four residential and commercial program areas in 2024 included:

Training

- In-Person – 14 Commercial
- Onsite Best Practices – 2 Residential and 10 Commercial
- Webinars – 2 Residential and 15 Commercial

Circuit Rider Outreach

- Jurisdiction and Organization Visits – 212
- Friendly Visit – 42
- Questions Answered – 13
- Helpline Responses – 8
- Requests Submitted – 1

Technical Documents and Resource Development

- Technical Documents – 7 Residential and 15 Commercial
- Videos – 1 Residential and 1 Combined Residential/Commercial
- Code Books – 67 Commercial
- Newsletters – 1 Combined Residential/Commercial

[4] Otter Tail Power is working with Xcel Energy, Centerpoint Energy, MN Power, and MN Energy Resource Group.

Meetings/Activities to Support Program

- Events – 4
- Meetings – 12
- Collaborative Meetings – 6
- Technical Advisory Group – 4
- CEE Meetings – 20
- Conferences – 1
- Articles Published – 1

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Code Compliance Support	**Actual**	**Proposed**	**% of Goal**
Participation	0	0	N/A
Budget $	$17,768	$30,000	59%

Evaluation Methodology

In the interest of minimizing any possible market confusion or duplication of tasks, the utilities waited to commence evaluation activities until the end of 2024. This allowed time to understand any immediate effects from legislation passed in 2024 as well as the opportunity for enhanced coordination with the Emerging Technology Accelerator (ETA) team. In 2025 the utilities expect the selected evaluation team to:

- Review inputs to the savings method and either confirm the inputs or suggest modifications (including Energy Use Intensity (EUI) improvement assumptions, compliance rates, and attribution rates).

- Review timelines and any other assumptions related to code adoption cycles and specify where updates are needed as a result of changes in legislation or administrative processes.

- Review forecasts of building volume, including distribution of building types and align with ETA methodology for calculating construction activity and resulting savings.

- Identify need and/or timing for a compliance study, enhanced program theory logic model development, and gross savings technical assumption updates to accommodate the next code cycle.

DIRECT IMPACT – LOW-INCOME

HOUSE THERAPY

The House Therapy program's primary focus is audit, direct-install, and weatherization services for low-income residential customers. The program and measures are available to both renters and homeowners. The following table provides details on measures installed and participant status as owners or renters.

House Therapy -- Owner / Renter Detail 2024			
Installed measures	**Owners**	**Renters**	**Total**
Audit	56	14	70
Custom Measure*	2		2
Energy Star Clothes Dryer	26	1	27
Energy Star Washer	24	1	25
Energy Star Dishwasher	6	1	7
Heat Pump	9		9
Faucet Aerator	24		24
Freezer	13	1	14
LED	311	232	543
Low-flow Showerhead	14		14
Pipe Insulation	1		1
Refrigerator	33	12	45
Power Strip Tier II	38	1	39
Water Heater	10	1	11
Water Heater - Reduce Temperature	28	2	30
Water Heater--Controlled Ser. Rate	4	1	5
Weatherization			
Attic Insulation Materials	5		5
Ceiling Fan Materials	1		1
Blower Door Test	2		2
Exterior Wall Insulation Materials	1		1
Other Weatherization Materials	9		9
Thermal Analysis	2		2

*Custom measures include electrical repairs and electrical panel upgrades.

House Therapy -- Owner / Renter Detail – 2024				
	CAP Spending	**Percent**	**Participation**	**Percent**
Owners	$191,880	90%	78	84%
Renters	$21,927	10%	15	16%
Total	$213,807	100%	93	100%

Otter Tail Power relies on local Community Action Program (CAP) Agencies to provide valuable technical expertise and implementation services for the House Therapy program. The Company commends the agencies' commitment to providing weatherization expertise and excellence in implementation services for this program.

Otter Tail Power promotes House Therapy using various resources including:

- Residential bill inserts.
- Within the environment disclosure insert posted on our website annually.
- Through the Company's website where contact information is listed for each of the agencies that implement the program.
- Through the CAP Agencies contracted with Otter Tail Power to implement the program.
- Through the Company's Low-Income Home Energy Feedback HERs targeting low-income households.
- Spanish-translated bill inserts were made available upon request in 2024.
- Outreach from contracted third parties to multifamily building owners and managers.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
House Therapy	**Actual**	**Proposed**	**% of Goal**
Participation	798	1,651	123%
Budget $	$255,085	$317,000	80%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
House Therapy	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	107,122
Demand Savings – kW	5.94

LOW-INCOME HOME ENERGY FEEDBACK

The Low-Income Home Energy Feedback program consists of a specialized Low-Income Home Energy Report (LI HER) experience to help the low-income segment of our customers to achieve energy savings, gain greater control over their home energy costs, and learn about resources available to them through Company programs and the greater community.

The LI HER program is designed as an opt-out program and provides direct mail delivery of up to four comparative energy usage reports and a monthly emailed LI HER that is sent to those participating customers who provide Otter Tail Power and email address.

Low-income customers were identified through segmentation within the Opower platform. Segmentation filters were based on the following attributes during 2024:

- The low-income home energy assistance program (LIHEAP) qualified indicator Otter Tail Power receives from state data; or
- Identified by Opower as meeting the Minnesota low-income definition, based on 80% of area median incomes, using third-party customer-level demographic data.

Participation in the program is defined as any low-income sector Minnesota residential customer that received one or more personalized LIHERs during 2024. Total participation in 2024 was 9,540 customers.

Low-Income Home Energy Reports

The LI HERs feature:

- Comparisons of recent energy use to comparable nearby homes.
- Comparison of past energy use to current use over time.
- Low-cost and no-cost energy saving ideas with an emphasis on those tips offering the highest impact on energy savings and the home's energy use pattern.
- Promotion of other low-income qualified programs available through Otter Tail Power.
- Promotion of other low-income qualified programs and services available in the region (such as LIHEAP).
- Spanish-translated reports upon request made available in 2024.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Low-Income Home Energy Feedback	**Actual**	**Proposed**	**% of Goal**
LI HER Participation	9,540	10,000	95%
Budget $	$72,617	$85,000	85%

Evaluation Methodology – LI HER

The 2024 evaluation of energy savings for the HER program was completed by Opower using integrated data from a variety of sources that allow for detailed analysis of energy savings results. The evaluation is included in Appendix B – Third Party Evaluations. The data included:

1. Consumption data
   Otter Tail Power provided weekly updates of monthly consumption data for all households in the program, including historical consumption information.

2. Parcel data
   Opower received, to the extent available from a third-party vendor, data about household parcels, including home size, age and value, heating and cooling type, as well as pool and hot tub data. These data elements are static with the exception of square footage, heating and cooling type, and pool and hot tub data, which may be updated at the customer's request.

3. Demographic data
   Opower received participant demographic data, to the extent available from a third-party vendor, including household income, age of occupant(s), number of occupants, and an owner/renter indicator. These fields were used to recommend customized energy efficiency tips to customers by using relevant demographic targeting. Household size may be updated at the customer's request.

Opower's analysis of the LI HER program relies upon a fixed-effects regression model. This statistical methodology is standard procedure for the analysis of controlled experiments, is a well-accepted practice within the energy efficiency program M&V community. This methodology and analysis closely resemble the "Large Scale Data Analysis" techniques described in the Model Energy Efficiency Program Impact Evaluation Guide from the National Action Plan on Energy Efficiency.

In 2016, updates were made to the Modeled Savings Methodology to improve the accuracy of the reporting. These changes include:

- Establishing the relationship between the monthly savings rate and the cumulative number of print reports received per person in the wave up to that month.
- Applying the forecasted savings rate in each month to the usage of the modeled wave.
- Adapting the algorithm to apply to rolling enrollment waves.

Otter Tail Power received approval from the Department on October 7, 2016, to apply a revised Modeled Savings Methodology to calculate energy savings to the HER program offered through the Energy Feedback program. The same approach is used for the Low-Income Energy Feedback LI HER program.

Overall adjusted energy savings associated with the HER and LI HER programs in 2024 totaled 13,019.01 MWh, equal to an average 330.43 kWh per participant household.

Energy Savings and Adjustments

In accordance with the Decision of the Department, these full savings are used in calculating the net benefits and cost effectiveness of the Energy Feedback program. For 2024, the energy savings associated with behavioral change has been reduced by two-thirds, based on the Decision by the Deputy Commissioner of the Department.[5]

ENERGY AND DEMAND RESULTS – 2024	
Low-Income Home Energy Feedback	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	1,173,804
Demand Savings – kW	487.66

[5]April 26, 2012, Docket Nos. E,G999/CI-08-133 and E017/CIP-10-356.

LOW-INCOME AND RENTER DETAILS

Pursuant to the Department's Decision in the matter of Otter Tail Power's 2021-2023 Electric Conservation Improvement Program Triennial Plan (Docket No. E017/CIP-20-475) issued November 24, 2020, utilities are required to clearly report the following metrics in their annual status reports:

a) the estimate of anticipated and actual low-income residential customer participation levels for each program as required in Minnesota Rules 7690.0550,
b) the estimate of anticipated and actual residential rental customer participation levels for each program as required in Minnesota Rules 7690.0550,
c) the planned and actual low-income spending and energy savings for each program, including dedicated low-income programs, as required in Minnesota Rules 7690.0550,
d) for programs that make use of the low-income multifamily policy guidance, the anticipated and actual spending and energy savings achieved for the program, and from market-rate versus affordable housing participants, through the program,
e) for programs that make use of the low-income multifamily policy guidance, the number of buildings and units served by market-rate versus affordable housing through the program, and
f) for programs that make use of the low-income multifamily policy guidance, the cumulative number and amount of incentives by measure type for market-rate versus affordable housing delivered through the program (e.g. total number and total value of incentives for boilers installed in market-rate and in affordable housing buildings through a multifamily program).

Tables A, B, and C below provide more detailed information pertaining to the Low-Income and Renter Details reporting requirements. Otter Tail Power does not offer any hybrid programs that make use of the low-income multifamily policy guidance to allocate expenses and savings. The company accounts for expenses and savings from multifamily projects taking place in buildings meeting low-income guidelines through its House Therapy program.

Table A: Budgeted total, actual total, anticipated low-income, and actual low-income participants.

	Budgeted Total Participants	Actual Total Participants	Anticipated Low-Income Participants*	Actual Low-Income Participants**
Residential				
Home Appliance	829	1,118	199	52
Home Direct Install	16,850	16,831	4,044	2
Home Energy Feedback***	33,500	29,860	-	748
Home Energy Management	18,906	18,691	4,537	1,477
Home Heating & Cooling	1,176	1,013	282	42
Home Lighting	187,765	127,780	45,064	38
EFS Electric Equipment and Too	303	178	73	23
Total - Residential	259,329	216,076	57,353	2,382
Low-Income				
House Therapy	1,651	798	1,651	368
Low-Income Energy Feedback	10,000	9,540	10,000	2,184
Total - Low-Income	11,651	10,338	11,651	2,552

* Based on 24 percent which was derived from 2020 and 2021 Census data.

**Cross referenced with OTP customers who received or were approved for an Energy Assistance Payments in 2024.

*** Low-Income participants are counted under the Low-Income Energy Feedback Program.

Table B: Budgeted total participants, actual total participants, anticipated rental participants and actual rental participants.

	TOTAL		RENTAL	
	Budgeted Participants	Actual Participants	Anticipated Participants *	Actual Participants **
Residential				
Home Appliance	829	1,118	232	19
Home Direct Install	16,850	16,831	4,718	3
Home Energy Feedback	33,500	29,860	9,380	3,633
Home Energy Management	18,906	18,691	5,294	1,688
Home Heating & Cooling	1,176	1,013	329	22
Home Lighting	187,765	127,780	52,574	20
EFS Electric Equipment and Tools	303	178	85	7
Total - Residential	259,329	195,471	72,612	5,392
Low-Income				
House Therapy	1,651	798	462	50
Low-Income Home Energy Feedback	10,000	9,540	2,800	1,781
Total - Low-Income	11,651	10,338	3,262	1,831

*Based on 28 percent which was derived from 2020 and 2021 Census data.

**Cross referenced with OTP customers who were identified as renter of landlord in our CIS system.

Table C: Proposed total kWh savings and expenditures, actual total kWh and expenditures, estimated low-income kWh and expenditures, and actual low-income kWh and expenditures.

	Budgeted Total		Actual Total		Anticipated Low-Income*		Actual Low-Income**	
	kWh Savings	Expenditures	kWh Savings	Expenditures	kWh Savings	Expenditures	kWh Savings	Expenditures
Residential								
Home Appliance	371,535	$183,000	315,180	$170,601	89,168	$43,920	832	2,500
Home Direct Install	1,414,236	$137,000	1,389,044	$150,963	339,417	$32,880	19,818	-
Home Energy Feedback***	3,755,119	$340,000	3,673,982	$220,387	901,228	$81,600	16,433	5,521
Home Energy Management	406,181	$116,000	403,646	$87,658	97,484	$27,840	83,402	6,927
Home Heating & Cooling	3,726,936	$915,600	5,973,867	$1,166,518	894,465	$219,744	134,080	19,876
Home Lighting	3,168,913	$657,000	2,694,184	$511,854	760,539	$157,680	856	2,237
EFS Electric Equipment and Tools	1,282,746	$194,000	563,703	$111,304	307,859	$46,560	4,165	3,498
Total - Residential	12,842,920	$2,542,600	14,449,903	2,307,982	3,082,301	$563,664	$255,421	$37,061
Low-Income								
House Therapy	107,122	$317,000	107,122	$255,085	107,122	$317,000	22,297	$135,364
Low-Income Energy Feedback	1,173,804	$85,000	1,173,804	$72,617	1,173,804	$85,000	1,338,451	$16,624
Total - Low-Income	1,280,926	402,000	1,280,926	327,701	1,280,926	402,000	1,360,748	151,988

* Based on 24 percent which was derived from 2020 and 2021 Census data.
**Cross referenced with OTP customers who received or were approved for an Energy Assistance Payments in 2024.
*** Low-Income participants are counted under the Low-Income Energy Feedback Program.

The Company does not require customers participating in its residential ECO programs to provide detailed information related to household income. For the purposes of the tables above, the Company instead has cross-referenced information on residential program participation with information on customers eligible for energy assistance. Not all customers who happen to be eligible for energy assistance will necessarily apply for and receive energy assistance, so it is likely that the above numbers understate actual low-income customer participation.

Further, actual participation attributed to low-income customers in larger programs, specifically in Home Lighting, is likely higher than reported estimates in the above tables. The majority of participation, kWh savings, and expenses for this program are the result of providing upstream incentives to provide participants with a more seamless experience. However, delivering programs through an upstream program model does not provide the Company with an accurate method of allocating participation, kWh savings, and expenses exclusively to customers meeting low-income program thresholds and/or those classified as renters. Therefore, Otter Tail Power only reports low-income Home Lighting participants as only those customers who the Company could cross reference between its hard-wired and new construction participants and those eligible for energy assistance. This results in the actual participation, savings, and incentive numbers being higher than reported in the above tables.

DIRECT IMPACT – COMMERCIAL

COMMERCIAL AUDITS AND STUDIES

Otter Tail Power's Audits and Studies program provided options for customers interested in assessing their facilities and operations to learn more about opportunities available in increasing energy efficiency. Key components of this program include:

- Building recommissioning/retrocommissioning (RCx).
- Compressed air system audits.
- Compressed air system leak studies.
- Compressed air RCx.
- Small to midsize business assessments.

Building recommissioning/retrocommissioning (RCx)

The *Energy Star® Building Manual* defines commissioning as the process of ensuring that systems are designed, installed, functionally tested, and capable of being operated and maintained to the owner's operational needs.

- Recommissioning is the term used for applying the process to a building that has been commissioned previously (either during construction or as an existing building).
- Retrocommissioning is the systematic process applied to existing buildings that have never been commissioned to ensure that their systems can be operated and maintained according to the owners' needs.

Building tune-ups, RCx Lite, and building optimization all refer to an evolution of the traditional RCx process. The approach starts by targeting the most common RCx measures with the highest chances of returning payback on operations and maintenance improvements. Often, these operation and maintenance improvements are associated with advanced control strategies. Engineering firms completing RCx Lite studies are often capable of identifying these measures through spot inspections of direct digital control systems without the added costs of seasonal monitoring and functional performance testing completed through formal RCx studies. Consequently, the RCx Lite process can identify up to 75 percent of the savings of a more formal RCx study at approximately 25 percent of the cost.

Otter Tail Power's RCx program provided incentives to qualifying commercial customers to complete RCx studies and implement cost effective, energy savings measures. The RCx program delivers a tiered approach to delivering RCx services. The RCx Lite tier provided

incentives for building tune-ups, where the RCx tier incentivized customers to implement formal RCx studies with more expansive measures. Potential participants must complete a pre-approval application form prior to initiating any RCx projects to insure eventual study funding from Otter Tail Power. Not all buildings and building types are ideal candidates for achieving energy savings through traditional RCx efficiency measures. The pre-approval process increased the likelihood that customers with buildings and building types with the best RCx opportunities capitalized on the RCx process.

Compressed Air Audits/RCx/Leak Studies

The Compressed Air Audit component paid up to 50 percent of compressed audit costs, with a maximum of $10,000 per participant. The project relied on industry consultants to provide professional audit services with an unbiased report on saving energy with compressed air system improvements.

Otter Tail Power provided incentives for customers completing studies to identify and repair leaks in compressed air distribution systems. Participants must have repaired all accessible leaks to qualify for study incentives.

Compressed air RCx studies focused on savings potential related to compressed air system setpoints, misapplications of compressed air, and other compressed air operating practices. Customers agreed to completing all identified measures with a combined payback of two years or less as part of receiving incentives through the program.

Small- to Mid-Sized Business Assessments

Customers who participated in Otter Tail Power's Commercial Direct Install program were eligible for a free assessment identifying the top three to five efficiency opportunities in their small- to mid-sized business. Working in tandem, one auditor focused on installation of low-cost efficiency measures while another auditor toured the business to identify efficiency opportunities. The Company followed up with a two-page report emailed to participants identifying efficiency investment opportunities along with cost estimates, energy cost savings, and payback information. Customers expressed appreciation for the efficiency measures and reports, with approximately ten percent of customers historically moving forward with implementing measures identified in their free assessments.

Otter Tail Power promoted the Commercial Audits and Studies program through a variety of resources including:

- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Bill inserts.
- Targeted campaigns featuring direct customer contact based on business type, energy use intensity, and geographic location.
- Brochures and literature.
- Personal consultations between program implementation staff and customers.
- Program, technology, and rebate information available on the Company's website.

Participation and Budget[6]

PARTICIPATION AND BUDGET – 2024			
Commercial Audits and Studies	**Actual**	**Proposed**	**% of Goal**
Participation	107	86	124%
Budget $	$143,706	$319,000	45%

Evaluation Methodology

Traditional RCx

Otter Tail Power, together with a third-party engineering consulting firm, reviewed the RCx study for accuracy of calculations, assumptions, and completion of all required RCx study requirements. Otter Tail Power works with the customer and the customer's engineering firm as needed to assure engineering calculations, assumptions, and the study all meet the Company's RCx program requirements.

Turn-Key RCx

Otter Tail Power used savings calculations developed by the Company's program implementation consultant using engineering fundamentals, site data, and energy modeling. To evaluate those savings, Otter Tail Power and its third-party program implementation consultant performed post-installation functional testing at each facility. This on-site M&V confirms each measure's implementation in accordance with the

[6] Reported participation in 2024 includes Commercial Direct Install Assessments which were originally included under the Advertising and Education program.

engineering recommendations. The savings calculations were revised based on observed conditions post-implementation and reflect any alteration to the measure that results from customer implementation.

Compressed Air

Otter Tail Power used the MN Technical Reference Manual (TRM), when available, and the Wisconsin and Vermont TRMs in its absence. All savings algorithms include actual data from historical Otter Tail Power compressed air assessments performed by independent third-party engineers or vendors.

Energy Savings

ENERGY AND DEMAND RESULTS – 2024	
Commercial Audits and Studies	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	687,003
Demand Savings – kW	302.89

COMMERCIAL DIRECT INSTALL

The Commercial Direct Install (CDI) program offered free energy assessments and installation of low-cost energy efficiency measures for participating small- to mid-sized commercial customers. The program capitalizes on personal interactions to educate customers in this often-overlooked market segment on:

- Benefits of energy efficiency.
- Energy efficiency opportunities in the customer's business operations.
- Quick, easy, and affordable measures that have a direct, immediate impact on reducing energy bills.

The free energy assessment offered through the Commercial Audits and Studies program provides the customer with a simple two-page report identifying opportunities for investing in energy efficiency measures and further educates customers on the subject. At the same time, direct-installation of easily installed energy efficiency measures, at no cost to the participant, provides real world examples of technologies readily available for reducing energy expenses in small- to mid-size businesses. Otter Tail Power promoted the CDI program through a targeted strategy based on community size and geographic location. The Company relied on personal contacts with local administration and government, Chamber of Commerce personnel, and other business organizations to determine overall interest in implementing the program.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Direct Install	**Actual**	**Proposed**	**% of Goal**
Participation	702	2,465	29%
Budget $	$30,924	$67,000	46%

Evaluation Methodology

The Company uses TRM savings algorithms and assumptions and customer-specific operational data where applicable.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Direct Install	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	44,843
Demand Savings – kW	5.58

COMMERCIAL ENERGY MANAGEMENT

The Commercial Energy Management program includes the previously approved commercial air conditioning control (CoolSavings) program. CoolSavings air conditioning control program targeted small commercial customers in Minnesota with central air conditioning systems. Customers were encouraged to enroll in the program and receive a bill credit of $6.00 per ton of connected load for each summer month (June-September).

Otter Tail Power promoted the program through various resources including:

- Personal business contacts.
- Bill inserts.
- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Program, technology, and rebate information available on the Company's website.

In 2024, Otter Tail Power controlled air conditioning 13 days, totaling 22 hours and 12 minutes. This control time is within the 300-hour control limit in the air conditioning rider.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Energy Management	**Actual**	**Proposed**	**% of Goal**
Participation	334	512	65%
Budget $	$4,533	$24,000	19%

Evaluation Methodology

Current energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Energy Management	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	7,234
Demand Savings – kW	76.18

COMMERCIAL HEAT PUMPS

The Commercial Heat Pump program targets commercial customers currently using or considering the installation of less efficient resistance electric heating and cooling systems by offering rebates for Energy Star® air conditioners and high-efficiency air source and geothermal heat pumps. During 2024 Otter Tail Power relied on Energy Star® qualifications and federal 25C tax credits as the reference for minimum equipment efficiency requirements. For air-to-water heat pumps, the Company utilized the criteria set by Efficiency Vermont, as this emerging technology does not currently have an Energy Star® qualification standard reference.

As discussed in the Home Heating and Cooling section, the higher tier cold climate heat pumps will continue to reference the 25C tax credit as presented in the Company's modification filing and will be reflected in the 2025 status report. The quality installation rebate program is also utilized by approved contractors for commercial customers and is discussed in more detail in the Home Heating and Cooling residential section.

Air source heat pumps met the following minimum rating requirements.

	SEER2	**HSPF2**	**COP***
Energy Star A/C	> or = 15.2	-	-
Standard heat pump	> or = 14.3	> or = 7.5	-
CCHP - Ductless	> or =16.0	> or =9.5	-
CCHP – Ducted	> or = 15.2	> or = 8.1	-
Air to water (AWHP)	-	-	> or = 1.7

*COP rating at A5W110 (At an outdoor ambient temperature of 5°F, the unit must deliver 110°F supply water.)

Geothermal heat pumps met the following rating requirements:

Geothermal Heat Pumps			
Type	**Loop Type**	**COP**	**EER**
Water to air	Open loop	4.1	21.1
Water to air	Closed loop	3.6	17.1
Water to water	Open loop	3.5	20.1
Water to water	Closed loop	3.1	16.1
Direct exchange		3.6	16.0
GHP single unit ≥ 6 tons		3.1	13.0

The Company continued a minimum requirement for single units equal to or larger than six tons. This change was made in 2023 following contractor feedback and the limitation of Energy Star® testing that does not account for these larger units which are more

prevalent in these commercial buildings. At these larger sizes, when compared to other heating/cooling options, geothermal heat pumps remain the highest efficiency technology available for customers.

The Company also continued an additional rebate for customers electing to add a buffer tank with a heating coil or a desuperheater option to their heat pump to provide preheating of domestic hot water. This rebate is limited to a maximum of 20 tons per customer.

Otter Tail Power promotes energy efficient heat pumps using various resources including:

- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Media campaigns including television, radio, and social and digital media campaigns.
- Bill messages.
- Bill inserts.
- Digital billboards.
- Hero spots on the home page of the website.
- Program, technology, and rebate information available on the Company's website.
- Participation in the Company's Integrated Building Design Plus program.

To increase participation, the Company offered rebates and financing at 1.9 percent in 2024.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Heat Pumps	**Actual**	***Proposed***	**% of Goal**
Participation	227	311	73%
Budget $	$520,078	$675,000	77%

Evaluation Methodology

Energy savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Heat Pumps	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	2,486,061
Demand Savings – kW	308.77

COMMERCIAL LIGHTING

The Commercial Lighting program provides incentives to commercial and industrial customers installing qualifying energy-efficient lighting technologies in new construction and for retrofitting to energy-efficient lighting technologies such as LED lamps and fixtures and lighting controls.

Otter Tail Power actively promotes the Commercial Lighting program through a variety of strategies including:

- *Taking Care of Business* commercial and industrial ECO brochure.
- Bill inserts.
- Digital and social media campaign.
- Personal interactions between customers and Company program implementation staff.
- *Programs and Services Guide* provided to contractors and employees.
- Program, technology, and rebate information available on the Company's website.
- Assessments completed for small- to mid-sized commercial businesses through the Company's Commercial Audits and Studies and Commercial Direct Install programs.
- Participation in the Company's Integrated Building Design Plus program.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Lighting	**Actual**	**Proposed**	**% of Goal**
Participation	781	1,015	77%
Budget $	$981,325	$1,546,000	63%

Evaluation Methodology

Otter Tail Power uses the TRM to calculate impact savings for the Commercial Lighting program. For retrofit installation, the Company documents all existing lighting wattage removed at each site and compares it to the actual energy efficient lighting wattage being installed to calculate energy savings. While for newly installed lighting systems, qualifying installed measures are compared to TRM baseline efficiency systems to determine kilowatt-hour savings. The TRM also establishes hours of operation. In accordance with the TRM protocols, energy and demand savings adjustments of 9.5 and 25.4 percent

respectively were allocated to those businesses having electric mechanical cooling. This is consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Lighting	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	11,418,027
Demand Savings – kW	1,756.54

COMMERCIAL and INDUSTRIAL FOCUSED EFFICIENCY

Otter Tail Power's largest industrial customers collectively make up less than one percent of all Minnesota customers but account for approximately 65 percent of total retail energy sales. As significant consumers of electricity, the industrial sector often provides abundant opportunities for improvements in energy management practices and implementation of energy efficiency upgrades.

The Commercial and Industrial Focused Efficiency program targeted customers in Otter Tail Power's commercial and industrial segment with potential for improvements in production processes, end-use efficiency, and energy management practices. The program used a proactive approach to benchmarking energy management practices and identified specific opportunities for efficiency improvements in large commercial and industrial facilities.

Implementation of the Commercial and Industrial Focused Efficiency program consisted of the following strategies:

1. Proactive Participant Identification

   Otter Tail Power considered anticipated customer engagement and energy savings potential while screening potential participants. The program focused on customers with annual savings potential of 250,000 kWh or greater, typically requiring annual consumption of at least 5,000,000 kWh. Potential participants who bring engaged enthusiastic management and employee teams to the table are more likely to pursue the most cost-effective energy saving behaviors and opportunities.

2. Energy Management Benchmarking

   For qualified customers, Otter Tail Power funded the Envinta Energy Roadmap energy management benchmarking analysis early in the process. The benchmarking session focuses on management practices related to energy efficiency by incorporating participation from across the customer's organization.

3. Project Identification

   Forming an engaged and knowledgeable energy management team is imperative to identifying efficiency opportunities on the customer site. To further facilitate identification of efficiency measures, Otter Tail Power funds the cost of engineering studies needed to identify and evaluate energy savings opportunities above a $500 copay from the participant. Possible efficiency measures include

lighting, drive-power systems, process efficiency improvements, refrigeration systems, compressed air systems, and custom efficiency projects.

4. Project Implementation
   Working in tandem with the customer's representation on the energy management team, Otter Tail Power developed a schedule of efficiency projects with potential bonus incentives. Bonus incentives are provided in exchange for the participant's completion of all measures before established deadlines. Efficiency measures might include projects traditionally accounted for under Otter Tail Power's prescriptive rebate programs, but Otter Tail Power attributes energy savings for each efficiency measure to the Commercial and Industrial Focused Efficiency program.

5. Measurement and Verification
   Otter Tail Power followed the M&V Protocols for end-use efficiency projects meeting the formal M&V requirements established by the Department.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Industrial Focused Efficiency	**Actual**	**Proposed**	**% of Goal**
Participation	18	26	69%
Budget $	$473,955	$657,000	72%

Evaluation Methodology

Otter Tail Power developed energy savings estimates through both established methodologies for prescriptive measures and through engineering calculations for custom measures implemented by the customer.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Industrial Focused Efficiency	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	2,331,848
Demand Savings – kW	520.76

COMPRESSED AIR EFFICIENCY

The Compressed Air Efficiency program provided incentives to commercial and industrial customers for implementing efficiency improvements in compressed air systems.

Compressed air systems afford users relatively easy distribution of and access to a robust power source present in nearly all industrial facilities, often referred to as the fourth utility in industrial plants. At the same time, compressed air generation is one of the most energy-intensive utilities in industrial facilities, with efficiency of compressed air systems typically at only ten to fifteen percent. Consequently, any improvements in compressed air system efficiency can lead to reduction of facility energy consumption in the order of 20 to 50 percent.

Otter Tail Power promoted Compressed Air Efficiency using various resources including:

- Personal interactions between Otter Tail Power representatives and customers with large, compressed-air systems.
- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Program, technology, and rebate information available on the Company's website.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Compressed Air Efficiency	**Actual**	**Proposed**	**% of Goal**
Participation	10	16	63%
Budget $	$18,522	$71,000	26%

Evaluation Methodology

Otter Tail Power uses the MN TRM, when available, and the Wisconsin and Vermont TRMs in its absence. All savings algorithms include actual data from historical Otter Tail Power compressed air assessments performed by independent third-party engineers or vendors.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Compressed Air Efficiency	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	113,546
Demand Savings – kW	37.62

CUSTOM EFFICIENCY GRANTS (CUSTOM PROJECTS)

The Grants program offered customized incentives to commercial and industrial customers for conservation and efficiency improvements. In 2024, Otter Tail Power analyzed a variety of customer-submitted grant projects that were approved for incentives.

Custom Projects Type of System Installation	Quantity
Building Envelope Improvements	3
Chiller System	1
Cooking Equipment	7
Cooling System	5
Integrated Building Design Plus	2
Motors	2
Production Equipment	6
Pumps	1
Variable Speed Drive	1
Total	**28**

Otter Tail Power promotes the Grant program through a variety of resources including:

- Personal interaction between Otter Tail Power representatives and customers.
- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Bill inserts.
- Program, technology, and rebate information available on the Company's website.
- Participation in the Company's Integrated Building Design Plus program.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Custom Efficiency Grants	**Actual**	**Proposed**	**% of Goal**
Participation	28	18	156%
Budget $	$335,499	$334,000	100%

Evaluation Methodology

Each custom grant measure is evaluated on an individual basis and estimated energy savings are calculated by Otter Tail Power and are specific to each individual measure.

The Company also considers and will verify estimated energy savings when submitted by a qualified and independent third-party energy services provider. Otter Tail Power provided expertise as needed, helped commercial and industrial customers determine the energy and demand savings needed to develop a grant proposal, and often worked with internal or third-party engineers to determine and verify savings.

The Large Custom Grant M&V protocols affect any large project with estimated savings exceeding one million kilowatts hours. The protocols include several options for M&V of large grant projects that meet the protocol criteria. In 2023, Otter Tail Power had two custom projects under the Custom Efficiency Grant program estimated to save greater than one GWh. Otter Tail Power submitted Pre-M&V reports with the DER for approval in late December 2023. Otter Tail Power submitted Post M&V results for one project in October 2024. The savings result of the project fell within 10 percent of the original estimate and does not require a true-up. The second project was granted an extension to file a final M&V report. The equipment is a part of a larger expansion project that has not yet been completed. A Post-M&V report will be submitted to the Department in 2025.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Custom Efficiency Grants	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	1,847,925
Demand Savings – kW	380.28

DRIVE POWER

The Company's Drive Power program encouraged commercial and industrial customers to improve the efficiency of systems through incentives for efficient electric motors and adjustable speed drives to maximize operational efficiency of motor systems.

Motors

The goal of the motors measures within the Drive Power program is to reduce system peak demand and energy use by offering customers incentives to purchase and install motors that meet or exceed NEMA Premium® efficiency ratings for various applications. Otter Tail Power offers incentives for high-efficiency totally-enclosed fan-cooled and open drip-proof motors sized from one horsepower to five-hundred horsepower. Incentives were also available for customers upgrading to efficient motors with explosion-proof enclosures sized between one and three-hundred horsepower. Additionally, the Company provided incentives for select electronically commutated motors installed in exhaust and HVAC fan applications.

Adjustable Speed Drives (ASDs)

Induction motors are the workhorses of industry, used in virtually every manufacturing plant and office building. However, the single most significant source of energy savings in induction motor systems lies not in the motor itself but rather in the controls that govern the motor's operation. ASDs are one method of modifying or controlling motor operation that is a proven option for improving performance and efficiency in drive systems. Through the Drive Power program, Otter Tail Power offered incentives based on horsepower for seasonal and nonseasonal ASDs.

Otter Tail Power promoted the Drive Power program using various resources including:

- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Bill inserts.
- Program, technology, and rebate information available on the Company's website.
- Participation in the Company's Integrated Building Design Plus program.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Drive Power	**Actual**	**Proposed**	**% of Goal**
Participation	597	388	154%
Budget $	$606,834	$374,000	162%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Drive Power	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	11,875,304
Demand Savings – kW	1,274.47

REFRIGERATION

The Refrigeration program is designed to promote high-efficiency commercial refrigeration technologies by offering rebates for new and retrofit installation of equipment such as parallel racks, condenser systems, sub-cooling systems, electrically commutated motors, and high evaporator temperature cases.

Otter Tail Power promoted the Refrigeration program using a variety of resources including:

- *Taking Care of Business* commercial ECO brochure.
- *Programs and Services Guide* provided to contractors and employees.
- Program, technology, and rebate information available on the Company's website.
- Quarterly phone conversations with contractors specializing in service and installations of commercial refrigeration systems.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Refrigeration	**Actual**	**Proposed**	**% of Goal**
Participation	41	113	36%
Budget $	$40,828	$181,000	23%

Evaluation Methodology

The Company used the TRM and engineering estimates for each refrigeration measure. Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Refrigeration	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	341,091
Demand Savings – kW	59.25

COMMERCIAL CODE COMPLIANCE SUPPORT

In collaboration with four other Minnesota electric and gas utilities[7], Otter Tail Power contributed resources to the Minnesota Energy Code Support Program's codes and standards compliance initiative. This proactive effort supports communities across Minnesota in improving commercial building energy code compliance. By providing resources and guidance, the utilities help communities throughout Minnesota understand and adhere to building codes in new construction projects, ultimately aiding them in achieving their energy performance and economic development goals.

Activities completed by the Minnesota Energy Code Support Program consultant included training, circuit rider outreach, development of technical documents and resources, and other general activities and meetings to support the program. Specific achievements in these four residential and commercial program areas in 2024 included:

Training

- In-Person – 14 Commercial
- Onsite Best Practices – 2 Residential and 10 Commercial
- Webinars – 2 Residential and 15 Commercial

Circuit Rider Outreach

- Jurisdiction and Organization Visits – 212
- Friendly Visit – 42
- Questions Answered – 13
- Helpline Responses – 8
- Requests Submitted – 1

Technical Documents and Resource Development

- Technical Documents – 7 Residential and 15 Commercial
- Videos – 1 Residential and 1 Combined Residential/Commercial
- Code Books – 67 Commercial
- Newsletters – 1 Combined Residential/Commercial

[7] Xcel Energy, MN Power, Centerpoint, and Minnesota Energy Resources.

Meetings/Activities to Support Program

- Events – 4
- Meetings – 12
- Collaborative Meetings – 6
- Technical Advisory Group – 4
- CEE Meetings – 20
- Conferences – 1
- Articles Published – 1

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Code Compliance Support	**Actual**	**Proposed**	**% of Goal**
Participation	N/A	N/A	N/A
Budget $	$18,380	$25,000	74%

Evaluation Methodology

In the interest of minimizing any possible market confusion or duplication of tasks, the utilities waited to commence evaluation activities until the end of 2024. This allowed time to understand any immediate effects from legislation passed in 2024 as well as the opportunity for enhanced coordination with the ETA team. In 2025 the utilities expect the selected evaluation team to:

- Review inputs to the savings method and either confirm the inputs or suggest modifications (including EUI improvement assumptions, compliance rates, and attribution rates).

- Review timelines and any other assumptions related to code adoption cycles and specify where updates are needed as a result of changes in legislation or administrative processes.

- Review forecasts of building volume, including distribution of building types and align with ETA methodology for calculating construction activity and resulting savings.

- Identify need and/or timing for a compliance study, enhanced program theory logic model development, and gross savings technical assumption updates to accommodate the next code cycle.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Code Compliance Support	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	532,990
Demand Savings – kW	60.84

DIRECT IMPACT – OTHER

PUBLICLY OWNED PROPERTY (POP) SOLAR

The objective of the POP Solar program is to demonstrate the benefits of solar PV generation by offering incentives for universal solar projects to rural Minnesota communities, local and tribal governments, and educational facilities. The program provides incentives for the installation of non-residential solar PV systems in public sector facilities. The POP Solar program is an example of universal solar, which shares the benefits of solar with all members of the community, university, public school, tribal property, or other publicly owned properties.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Publicly Owned Property Solar	**Actual**	**Proposed**	**% of Goal**
Participation	9	16	56%
Budget $	$423,763	$1,000,000	43%

Overall, the Company focus is providing information and support on technology, installation/interconnection processes, support letters and financial analysis on grants, tax credits, financing options and POP Solar rebates. Company engagement also included traveling to multiple schools and, in some cases, participating in contractor proposal reviews to provide additional guidance to school administrators. Additional participation included engagement at annual school leadership conferences and discussions with local action agencies and city councils. The program rebated nine installations with a solar capacity of 359 kW.

Evaluation Methodology

Otter Tail Power utilized National Solar Radiation Data to build hourly profiles for a typical solar installation in the company's service area. It uses these profiles to determine energy savings that can be expected of rebated systems based on kW size.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Publicly Owned Property Solar	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	516,684
Demand Savings – kW	222.55

EFFICIENT TECHNOLOGY ACCELERATOR

The Efficient Technology Accelerator (ETA) is a new market transformation program managed by the Center for Energy and Environment and administered by the Department of Commerce, in coordination with investor-owned utilities. The goal of this partnership is to:

- Drive a strategic process to accelerate market deployment of key technologies,
- Employ effective strategies to leverage market forces,
- Become a hub for collaboration among stakeholders, and
- Achieve cost-effective energy savings and other benefits for utilities and Minnesotans.

In 2024, ETA laid the foundation for its market transformation efforts, working to accelerate the deployment of emerging energy-efficient technologies throughout the state. Key activities included:

- Engaging with key supply chain market actors,
- Developing and delivering training to support Minnesota installers and companies,
- Refining and improving technology value propositions,
- Enhancing customer tools and resources,
- Facilitating collaboration and alignment across utility programs,
- Forming partnerships with manufacturers, and
- Engaging nationally to raise visibility and focus on emerging technologies.

These strategic outreach and collaborative efforts have established a strong foundation for continued success in driving market transformation and generating energy savings across Minnesota.

By the end of 2024, ETA had advanced five initiatives to the Market Deployment Stage. These include Residential Air-Source Heat Pumps (ASHP), High-Performance Windows (HPW), Luminaire Level Lighting Controls (LLLC), Next Generation Rooftop Units (Next Gen RTU) and Energy Codes and Standards Advancement. Early projections for these technologies suggest they could significantly reduce customer bills while providing measurable societal benefits. While 2024 focused on launching new initiatives into the market, in 2025 the ETA plans to start claiming savings from the market effects of its activities.

Participation and Budget

The majority of 2024 ETA efforts were on Program development making it premature for participation numbers to be reported. Otter Tail Power did incur costs in 2024, receiving invoices from CEE in the amount of $116,167 and dedicating several hours of labor to the Program for a total annual 2024 spend of $117,832.

Energy Savings and Adjustments

The ETA program is still under development and has not produced savings to date. Otter Tail Power is hopeful these programs will deliver significant energy savings in the future.

INDIRECT IMPACT PROGRAMS / REGULATORY REQUIREMENTS

ADVERTISING AND EDUCATION – Residential and Commercial

Advertising and Education – Residential

The Advertising and Education program for 2024 targeted Minnesota service area residents of all ages with reinforcing messages to understand energy options for efficiency and to make conserving energy a lifestyle. The program was designed to include three approaches to achieve its goals:

- *Advertising* that increases awareness of and educates customers about energy-efficient technologies and motivates individuals to act to conserve energy.
- *Internet-based resources* including efficiency program content, technology descriptions, rebate information, and seasonal energy saving tips on the Company website.
- *Learning environment presentations* targeting students across all economic groups with educational messages and activities related to energy production, energy use, and conservation.

Advertising

In 2024, media campaigns supported through the Advertising and Education program focused on delivering messages about energy-efficient technologies. These included:

- Energy efficient technologies as a lifestyle campaign. Television, radio, and social media campaign spots showed customers the many applications where they can choose efficiency when putting energy to use. Advertisements highlighted Energy Star® home appliances, smart thermostats, and LED bulbs.
- Digital billboard space shared at various times of the year by all ECO projects.
- Comprehensive bill inserts offering seasonal energy-efficiency tips applicable to all efficiency programs.

Additional advertising support during 2024 for residential programs included a catalog of ECO offerings available to Minnesota residential and small commercial customers, and contractor education pieces.

Internet-Based Resources

This portion of the program supports development of ECO program-focused promotional and educational materials for the Company website. Web-based materials encourage participation in direct impact energy-efficiency programs in the ECO portfolio, featured

on the Company's "Ways to Save" section of its website. The website is continuously updated to feature the latest information on Otter Tail Power's energy efficiency and conservation programs.

Site visit data is collected from web analytic tools used to track unique visitors to the site. The data reported for 2024 reflects activity only on the web pages related to advertising spots supported through this program and are adjusted to reflect the Minnesota specific customer web participation, which is calculated as 45 percent of the unique visitors to the website pages. This represents the portion of Company customers located in Minnesota.

Learning Environment Presentations

Otter Tail Power continued its partnership with Otter Cove Children's Museum, a unique Fergus Falls resource that serves children in the region up to age 10, offering indoor play space with both educational exhibits and a playground structure under the same roof. In 2021, through Otter Tail Power's Advertising and Education program a set of interactive energy- and conservation-focused exhibits were developed. The exhibits continue to be accessed in 2024, and there were 20,625 children visits logged to the Otter Cove facility with the opportunity to interact with the installations. Additionally, Discover Energy!, a set of interchangeable engagements that are remixed to create unique experiences, was developed and introduced as staff-led experiences for children and their caretakers. Monthly Discover Energy! sessions provided during 2024 covered hydroelectric generation, solar energy, and wind energy generation topics and related activities with up to 22 children participating per session.

In 2024, Otter Tail Power provided support for the Headwaters Science Center in Bemidji to develop educational exhibits focused on the science and mechanics behind heat pumps. Heat pump technology is used, at the science center, to transfer energy between two habitats. Three tanks are on display on the exhibit floor. Tank 1 uses heat pump mechanisms and houses one axolotl. Tank 2 has hot climate lizards and cool water axolotls. Lizards live in >80 degrees while axolotls live in 60-64 degree water. Tank 3 is a modified and improved version of tank 2 and is home to 2 axolotls, male and female. Unintentionally, the female's eggs are fertilized. The Science Center is anticipating young soon.

Participation and Budget

2024 A&E Residential Detailed Participation	
Otter Cove Children's Museum	20,625
Headwaters Science Center	26,865
Web visits related to advertising	66,635
Total	114,125

PARTICIPATION AND BUDGET – 2024			
Residential Advertising & Education	**Actual**	**Proposed**	**% of Goal**
Participation	114,125	15,000	761%
Budget $	$166,297	$193,500	86%

Advertising and Education – Commercial

Otter Tail Power's Advertising and Education program is also used to support promotion of energy-efficiency technologies and conservation benefits to small and midsize commercial customers. One of the methods used is the development and distribution of a catalog of programs and rebate opportunities aimed at commercial business operations. Additionally, this program supports advertisement about energy efficient upgrades and rebates available to business customers through chamber of commerce newsletters.

Ongoing efforts include updates to the company web pages related to ECO programs for our Minnesota commercial and industrial customers. This work was included as part of the web update project for residential customers. The upgrades were designed to make the content mobile-friendly, easier to navigate, engaging and meaningful for commercial and industrial customers, and effective in helping the company reach its ECO program goals. Navigation directs customers to specific sections for businesses and contractors that target the most beneficial programs for visitors in those groups.

Participation and Budget

ACTUAL / BUDGET – 2024			
Commercial Advertising & Education	**Actual**	**Proposed**	**% of Goal**
Participation	0	0	N/A
Budget $	$29,877	$28,500	105%

Program participation of zero is the result of the Company now tracking efficiency assessments completed as part of the Commercial Direct Install program in Commercial Audits and Studies instead of its Advertising and Education program.

FINANCING – Commercial

The Financing program is designed to provide low-interest loans for installation of air source and geothermal heat pump systems. The difference between the interest expense at the Company's after-tax cost of capital and the expense at the customer's interest rate is the cost charged to the ECO Tracker Account. The interest rate was 5.9 percent for 2024.

Otter Tail Power promotes the low-interest Financing program in various resources including:

- *Taking Care of Business* commercial ECO booklet.
- *Programs and Services Guide* provided to contractors and employees.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Financing	**Actual**	**Proposed**	**% of Goal**
Participation	1	5	20%
Commercial Budget $	$7,766	$15,000	52%

IMPLEMENTATION AND TRAINING – Residential and Commercial

The Implementation and Training program provides instruction about energy efficient technologies and Demand Side Management trends for the Company's design, implementation, and customer service staff. This program also provides training opportunities for customers, electricians, insulation installers, other contractors, and Company representatives.

In January and February 2024, Otter Tail Power co-sponsored electrician code credit events with Minnkota Electric Cooperative. Workshops were promoted on our website, in newsletters, and through direct mail pieces.

The second key initiative in the Implementation and Training program consisted of training workshops held at Shooting Star Casino and Event Center in Mahnomen, Minnesota and Dakota Magic Casino near Hankinson, North Dakota along the Minnesota/North Dakota border. A total of 12 Otter Tail staff and 188 contractors, equipment vendors, and other interested parties attended the workshops with an agenda covering:

- Introductions of Otter Tail Power Energy Management Representatives,
- Energy Conservation and Optimization background,
- Current ECO programs and rebates,
- Introduction to www.otpco.com website, including Ways to Save pages featuring details on ECO programs; the Company's online "Find A Contractor" tool and details on the new Quality Installation incentive and certification process for contractors,
- Demand Response programs and incentives,
- Inflation Reduction Act update, and
- Vendor showcase with networking opportunities

The contractor workshops, in both locations, were successful in educating contractors about new incentives and opportunities brought forth with the transition from the former CIP to the new ECO programs through specific agenda items. The additional vendor show provided opportunities for program design and implementation staff, DSM equipment vendors and suppliers, along with installation contractors to network and learn about new technologies, programs, challenges, and opportunities that exist in the field. The Company is proud of the effort, with attendees rating the event with an average score of 4.5 out of 5 and numerous positive comments from attendees. The Company looks forward to similar training opportunities in 2025.

Internal Otter Tail Power training and testing for the Association of Energy Engineer's (AEE) Certified Energy Manager program was the third substantial strategy behind the Implementation and Training program. The Company experienced staffing changes and additions through 2024, specifically adding a commercial and industrial energy auditor, a residential energy auditor and new staff in industrial and commercial representative positions. After analyzing expenses required to send individuals to various AEE training sites, the Company determined it was more cost effective to contract with AEE for training onsite at Otter Tail Power's headquarters in Fergus Falls, MN. Sixteen staff members registered for the four-day course and exam. Staff who registered for the course reported challenging, but very useful content applicable to their careers in energy efficiency.

Participation and Budget

ACTUAL / BUDGET – 2024			
Implementation & Training	**Actual**	**Proposed**	**% of Goal**
Residential Participation	51	175	29%
Residential Budget $	$132,491	$38,000	349%
Commercial Participation	415	250	166%
Commercial Budget $	$160,466	$200,000	80%

INTEGRATED BUILDING DESIGN PLUS (IBD+) – Commercial

In the integrated building design process, architects, engineers, and energy experts team up early in the design process to coordinate and optimize the design of all components and systems. This team functions and works according to clearly defined goals:

- Design a building with operating costs as low as possible without sacrifices to occupant comfort.
- Design a building with as little environmental impact as possible.
- Design a building that will boost worker productivity.
- Incorporate all features with minimal increases in first costs.

The greatest opportunities to reduce the future energy use of a new building occur during the design development phase. However, the decisions made during commercial building design are often driven by aesthetics, capital costs, and designer familiarity. Information on how these decisions will impact energy consumption and operating costs is often not readily available to building design teams. Obtaining data on energy impacts is the primary barrier to analyzing effects of various design decisions on building energy efficiency, as accurate projections require complex, detailed analysis and energy modeling. Most design firms do not have the time or budget to perform the required analyses, and without the need to regularly exercise such skills, the firms also lack the critical staffing needed to perform specialized energy analysis and modeling.

The objective of Otter Tail Power's IBD+ program is to optimize the energy efficiency of new construction projects by encouraging greater design team cooperation in an integrated building design process. Otter Tail Power encourages participation in the IBD+ program by providing:

- Design assistance consulting services for participating customers and design teams.
- Reimbursements to design team members for added time required to participate in the integrated building design process.
- Identification of energy savings for various design packages compared to the baseline design efficiency of Minnesota State Energy Code.
- Identification of incentives available through Otter Tail Power's prescriptive Lighting, Motors, Adjustable Speed Drives, Heat Pumps, and Custom Grants programs.
- Training for design team professionals in proper design of geothermal and other high efficiency HVAC systems.

Otter Tail Power promotes the IBD+ program through a variety of resources including:

- *Taking Care of Business* commercial ECO brochure mailed to targeted commercial and industrial customers annually.
- Annual *Program and Services Guide* sent to contractors and dealers.
- The Company's website. The website also features a link to an electronic program application form.
- Through the design assistance consultant's network, membership, and participation as professionals in architectural and engineering organizations, including the American Society of Heating, Refrigeration, and Air Conditioning, Engineers (ASHRAE); the American Institute of Architects; and the Illuminating Engineering Society (IES).

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Integrated Building Design Plus	**Actual**	**Proposed**	**% of Goal**
Participation	4*	6	67%
Budget $	$145,661	$252,000	58%

*The four IBD+ participants are included here, however their energy efficiency measures are evaluated and included as participants within their corresponding direct impact programs.

EFFICIENT FUEL SWITCHING PROGRAMS

The 2024 Efficient Fuel Switching (EFS) Status Report has been combined with the 2024 ECO Status Report, and 2024 Financial Incentive Filing, produced annually on April 1. The EFS Status Report covers all 2024 programs. Participation, program costs, and energy and demand savings for all programs are outlined in Appendix A, Table 5. The programs described in this Status Report were approved alongside the 2024 ECO Plan unless stated otherwise.

The objective of Otter Tail Power's EFS programs is to promote technologies that provide customers benefits over the alternative fuel sources, reduce emissions, and meet all Minnesota statutory requirements.

HOME HEATING AND COOLING – FUEL SWITCHING

Otter Tail Power offers residential customers an incentive for the successful installation of a heat pump when the customer has an existing operational alternative fuel source (fuel oil, propane, or natural gas) heating system paired with an electric air conditioning system. The electric heat pump system reduces the usage of the alternative fuel system reducing emissions and provides the customer with the opportunity to reduce annual cooling and heating costs. The minimum performance requirements of the heat pump equipment are equal to the standard Home Heating and Cooling program and federal 25C tax credit requirements. This alignment streamlines marketing and communication processes for overall administration efficiency. The Company considers the first year of this program as a success, even with the delayed role out of the federal and state incentive programs.

Incentive Levels

- $300/ton for Standard Heat Pump– ductless and ducted
- $600/ton for Cold Climate Heat Pump – ductless
- $800/ton for Cold Climate Heat Pump – ducted
- $800/ton for Air to Water Heat Pump
- $1,200/ton for Geothermal Heat Pump

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Home Heating and Cooling	**Actual**	**Proposed**	**% of Goal**
Participation	74	85	87%
Budget $	$110,395	$150,000	74%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Home Heating and Cooling	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings - kWh	1,251,917
Demand Savings – kW	0

ELECTRIC VEHICLE AND OUTDOOR EQUIPMENT – RESIDENTIAL

The Company offers residential customers incentives for the purchasing of new or used battery electric vehicles (BEVs) or plug in hybrid (PHEVs). The customer must purchase the vehicle from an approved dealer and private to private sales do not qualify. The Company also offers incentives for outdoor electric equipment including push mowers, riding mowers, snow blowers, and lawn tools (weed trimmers and leaf blowers). These technologies currently come with a premium price and customer incentives are needed to move the market to adopt them, this is especially true in the rural areas Otter Tail Power serves. The Company saw significant interest and participation in the lawn equipment section. Electric lawn equipment and tools is a great introduction to the benefits of electric powered technologies and provides a steppingstone in the conversation with customers for taking the next step in switching out their vehicle transportation to electric.

Incentive Levels

- $3,000/unit for New Battery Electric Vehicle
- $1,500/unit for New Plug in Hybrid Electric Vehicle
- $750/unit for Used Plug in Hybrid Electric Vehicle
- $250/unit for New Electric Push Mower
- $750/unit for New Electric Riding Mower
- $150/unit for New Electric Snow Blower
- $25/unit for New Lawn Tools (Weed Trimmers, Leaf Blowers)

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Electric Vehicle - Residential	**Actual**	**Proposed**	**% of Goal**
Participation – Electric Vehicles	27	63	43%
Participation- Lawn Equipment	276	115	240%
Budget $	$111,304	$194,000	57%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Electric Vehicle - Residential	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings - kWh	563,703
Demand Savings – kW	0

Otter Tail Power offers commercial customers an incentive for the successful installation of a heat pump when the customer has an existing operational alternative fuel source (fuel oil, propane, or natural gas) heating system paired with an electric air conditioning system. The electric heat pump system reduces the usage of the alternative fuel system reducing emissions and provides the customer with the opportunity to reduce annual cooling and heating costs. The minimum performance requirements of the heat pump equipment are equal to the standard Commercial Heat Pump Program and federal 25C tax credit requirements. This alignment streamlines marketing and communication processes for overall administration efficiency. The Company looks to build on program success in future years and continue to increase awareness of fuel switching to customers who in prior years were ineligible for Otter Tail Power rebates.

Incentive Levels

- $300/ton for Standard Heat Pump– ductless and ducted
- $600/ton for Cold Climate Heat Pump – ductless
- $800/ton for Cold Climate Heat Pump – ducted
- $800/ton for Air to Water Heat Pump
- $1,200/ton for Geothermal Heat Pump

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Commercial Heat Pumps	**Actual**	**Proposed**	**% of Goal**
Participation	40	62	65%
Budget $	$69,069	$104,000	66%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Commercial Heat Pumps	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings - kWh	665,768
Demand Savings – kW	0

ELECTRIC EQUIPMENT – COMMERCIAL

The Company offered commercial customers incentives for the purchase of new electric equipment. The equipment options included electric school buses, push/riding mowers, and forklifts. The program is a great tool for customer engagement and leads to discussions with customers about the benefits going electric can have on larger purchases.

Incentive Levels

- $5,000/unit for New Electric School Bus
- $3,000/unit for New Electric Forklift: Over 6,000-pound lifting capacity
- $2,500/unit for New Electric Forklift: Under 6,000-pound lifting capacity
- $500/unit for New Electric Riding Mower
- $100/unit for New Electric Push Mower

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Electric Equipment – Commercial	**Actual**	**Proposed**	**% of Goal**
Participation	6	7	86%
Budget $	$17,692	$14,000	126%

Evaluation Methodology

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Electric Vehicle – Commercial	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	439,542
Demand Savings – kW	0

LOAD MANAGEMENT

In 2024, the Load Management program was newly incorporated into the Company's ECO portfolio as permitted by the 2021 Minnesota ECO legislation. The Load Management program specifically includes winter season loads on the Minnesota Small and Large Dual Fuel, Deferred Load, Residential Demand Control (RDC), Fixed Time of Service, and Electric Vehicle (EV) Charging Rates. This program's focus is peak demand reduction only and does not report any energy savings.

Otter Tail Power has a long history of offering load management programs. They are core to the Company's service offerings with nearly one-third of customers participating in some form of load management. This strong customer participation has made the program one of the largest in the country by customer adoption percentage. Load management has been and remains an effective tool to reduce total winter peak load, and with it, reducing system capacity needs. Through the load management programs customers partner with the Company to help manage the electrical grid as well as customer costs.

As Otter Tail Power Load Management tariffs are currently available to both residential and non-residential service, for approved permanently connected loads, this program is a combined program for residential and commercial customers. Savings are based on winter season demand reductions.

Specific tariffs included in the Load Management program are:

- **Small Interruptible Heating Customers**
  These are customers with self-contained metering on the Controlled Service – Interruptible Load Self-Contained and Current Transformer (CT) Metering Rider (commonly called Dual Fuel Riders). This rate is for permanently connected interruptible heating loads with alternate fuel backup systems served with self-contained (typical) metering. In 2024, Otter Tail Power controlled small interruptible heating customers 41 days, totaling 48 hours and 39 minutes.

- **Large Interruptible Heating Customers**
  These are larger load customers with CT metering on the Controlled Service – Interruptible Load Self-Contained and CT Metering Rider. This tariff is for permanently connected interruptible heating loads with alternate fuel backup systems serviced by current transformer CT metering. In 2024, Otter Tail Power

controlled large interruptible heating customers 41 days, totaling 70 hours and 27 minutes.

- **Residential Demand Control Customers**
  These are customers taking service on the Residential Demand Control (RDC) Service Rate. This rate is available to residential customers with approved demand-control systems and applies to lighting, heating, water heating, cooking, refrigeration, air conditioning, and other general uses of electricity. In 2024, Otter Tail Power controlled residential demand control customers 23 days, totaling 31 hours and 18 minutes.

- **Thermal Storage Customers**
  These are customers taking service on the Controlled Service – Deferred Load Rider which is applicable to both residential and non-residential service for any approved permanently connected thermal storage deferred loads. In 2024, Otter Tail Power controlled thermal storage customers 40 days, totaling 75 hours and 8 minutes.

- **Fixed Time of Service**
  These are customers taking service on the Fixed time of Service Rider in which energy is delivered only between the hours of 10 p.m. and 6 a.m. Eligible systems will be electric thermal storage central or room heating, underfloor electric cable or panel, and boilers associated with underfloor hydronic heat storage.

- **Electric Vehicle Charging**
  These are customers taking service on a qualified off-peak rate including the Electric Vehicle Charging Rate in which energy is delivered only between the hours of 10 p.m. and 6 a.m.

MARKETING

The target market of the Load Management program is both residential and commercial customers including those with end of life or inadequate systems.

Otter Tail Power reached the potential market for the Load Management program through bill inserts, bill messaging, website information, and traditional and digital media campaigns. Messaging focused on the benefits of demand response as a method of managing the electrical system and avoiding the purchase of higher priced energy, as well as the financial incentives available to customers through equipment rebates and discounted rates.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
Load Management	**Actual**	**Proposed**	**% of Goal**
Participation	1,679	10,241	16%
Budget $	$198,826	$311,500	64%

Evaluation Methodology

Otter Tail Power had initially assumed that all Load Management customers would be eligible for inclusion in the ECO Load Management program. However, following the MPUC Order on Utility Performance Incentives for Energy Conservation, Otter Tail Power has since revised its eligible participants which dramatically decreases the level of demand savings reported for 2024.[8] The Company used its billing system to review all new customers Load Management customers that were new to a qualified Load Management tariff since May 21, 2021, and are still a qualified customer as of the end of 2024. Savings assumptions per type of Load Management customer remained consistent from the 2024-2026 Triennial ECO filing. Otter Tail Power did not have the resources to individually monitor, track, and report the load reduction for qualified customers in 2024.

Energy and demand savings for this program are consistent with Attachment B: Electric Product Assumptions, approved in the Company's Triennial Plan.

Energy Savings and Adjustments

ENERGY AND DEMAND RESULTS – 2024	
Load Management	**At the Generator (DSMore Summer Coincident Peak kW)**
Energy Savings – kWh	0
Demand Savings – kW	10,369.23

[8] Docket E,G999/CI-08-133.

PROGRAM DEVELOPMENT

Program Development includes ECO strategic market planning analysis, ECO-related resource planning work, and ECO-related regulatory coordination. It includes program development time for research and studying new energy efficient and DSM technologies. Otter Tail Power also used development funding for appropriate development research and information from internal and external sources, including Chartwell.

Otter Tail Power's Sales, Marketing, and Reporting Tool (SMRT) has been in use since 2011, with continued improvements over that time. The SMRT system provides the data necessary for reporting, forecasting, tracking, and processing ECO rebates. Over the years, work improvements included adding new programs, development of management dashboards, reporting tools for program management, and ongoing enhancements of an online customer portal for submitting rebate applications or checking the status of rebates. The 2024-2026 ECO plan included the migration of SMRT from an on-premises system to the cloud which will provide several benefits to Otter Tail Power Staff. The cloud environment will allow for mobile accessibility, additional reporting capabilities, and integration with other Microsoft products used by Otter Tail Power staff, such as Outlook, SharePoint, and Teams. It will also provide opportunities to integrate with other systems at Otter Tail Power to create a comprehensive information system and will deliver a more efficient and user-friendly experience overall due to enhanced search functionality, intuitive navigation, and an improved document storage solution. The cloud migration project officially began in the fall of 2024, with just over one-third of the contracted hours of development completed by year-end. The project was completed in early 2025, and the system went live in the cloud at the end of February with great results.

ACTUAL / BUDGET – 2024			
Program Development	**Actual**	**Proposed**	**% of Goal**
Planning – Regulatory Affairs	$217,516	$280,000	78%
Research & Development	$69,302	$180,000	39%

REGULATORY REQUIREMENTS

PUC ASSESSMENTS / REGULATORY (NGEA) ASSESSMENTS

PUC ASSESSMENTS / REGULATORY (NGEA) ASSESSMENTS			
	Actual	**Proposed**	**% of Goal**
PUC Assessments	$2,010	$15,000	13%
Regulatory Assessments (NGEA)	$78,524	$125,000	63%
Transmission & Distribution Cost Study	$0	$0	0%

ASSESSMENTS	
NGEA Assessment – Technical Assistance	$13,141
NGEA Assessment – R&D Grant	$57,410
NGEA Assessment – Facilities Efficiency	$7,974
Total NGEA Assessments	**$78,524**
Direct PUC Assessments	$2,010
Transmission & Distribution Cost Study	$0
Total	**$80,535**

MISCELLANEOUS / INACTIVE PROGRAM COSTS

This section is a summary of costs corresponding to miscellaneous and inactive programs. The associated costs, including closing costs for these programs, were charged to the 2024 ECO tracker account. Each is detailed separately below.

ACCOUNTING ADJUSTMENTS

In 2024, one accounting adjustment was required in the Commercial Direct Install program to record a 2023 service provider billing true-up, decreasing costs by $49.70.

Since 1993, Otter Tail Power has implemented an internal process to handle moving incorrect charges between project work orders. A line item has been added to the ECO Tracker Account to reflect those charges in transition. The Company believes this method allows us to report current year program costs more accurately.

OTTER TAIL POWER ECO PROJECTS

Otter Tail Power didn't complete any facility efficiency projects rebated through ECO in 2024.

Participation and Budget

PARTICIPATION AND BUDGET – 2024			
OTP ECO Projects	**Actual**	***Proposed***	**% of Goal**
Participation	0	0	N/A
Budget $	0	0	N/A

CARRYING COSTS

Carrying Charges on the balance of the ECO Tracker totaled ($59,979), as shown in Appendix A, Table 1.

Otter Tail Power receives or pays a carrying charge on the outstanding ECO tracker account balance based on its short-term cost of debt rate. The ECO tracker currently reflects an overcollection for the majority of 2024, resulting in a carrying charge amount which will benefit ratepayers. As approved in the MPUC's September 26, 2015, Order, Docket No. E017/M-14-201, the monthly carrying charge on the ECO tracker-account balance has been set to the short-term cost of debt rate approved in the Company's last rate case. The MPUC's February 1, 2022, Order, Docket No. E017/GR-20-719, set the short-term cost of debt at 1.77 percent, effective January 1, 2021. Otter Tail Power applied this rate to the ECO tracker-account balance per the MPUC's order.

Otter Tail Power does not account for carrying cost charges when calculating the spending requirement (see Appendix A, Table 5 Status Report Recap) but does include the amount in the ECO Tracker for recovery.

Conservation Cost Recovery Adjustment

CONSERVATION COST RECOVERY ADJUSTMENT

Otter Tail Power has filed 30 Annual Filings illustrating its dedication to energy efficiency through its Conservation Implementation Plan. This filing constitutes the Company's first Annual Filing to Update the Energy Conservation Optimization (ECO) Rider (Annual Filing) that Otter Tail Power Company (Otter Tail Power, the Company) has made with the Minnesota Public Utilities Commission (Commission, MPUC) to update the ECO Rider adjustment, more commonly referred to as the Conservation Cost Recovery Adjustment (CCRA).

The CCRA may be adjusted annually by approval of the Commission. The recoverable ECO tracker balance is determined as described below, starting with the Commission accepted ECO tracker account balance as of the end of the prior year. The following adjustments are made from this starting point:

1. Add financial incentives awarded by the Commission not reflected in the prior year-end ECO tracker balance;
2. Add current year ECO approved spending levels.

All costs appropriately charged to the ECO tracker account shall be eligible for recovery through this rider and all revenues received from the application of the CCRA shall be credited to the ECO tracker account. Table 1 illustrates the last ten years of the Average CCRA charge.

Table 1

Year	Average CIP Surcharge / Average CCRA Factor	Previous Year Ending Tracker Balance
Oct 2016 / Sep 2017	$0.00275	$4,333,061
Oct 2017 / Sep 2018	$0.00536	$4,835,852
Oct 2018 / Dec 2019	$0.00600	$7,365,957
Jan 2020 / Sep 2020	$0.00710	$5,994,017
Oct 2020 / Nov 2021	$0.00485	$3,955,955
Dec 2021 / Sep 2022	$0.00582	$2,067,599
Oct 2022 / Jun 2023 Jul 2023 / Sep 2023*	$0.00667 $0.00805	$2,870,213
Oct 2023 / Jan 2024** Feb 2024 / Nov 2024	$0.00600 $0.00680	$210,329
Dec 2024 / Oct 2025	$0.00555	($3,321,343)
Nov 2025 / Oct 2026	$0.00585	($3,194,439)

*On July 1, 2022, final rates from Otter Tail Power's General Rate Case in Docket No. E017/GR-20-719 went into effect which no longer recover any CIP costs through base rates thus no longer needing to subtract those costs from the recoverable CIP tracker.

**On July 27, 2023, the Commission approved a CCRA rate of $0.00682, but Otter Tail Power inadvertently implemented its originally proposed CCRA rate of $0.00600 from October 1, 2023, through January 31, 2024. The correct rate of $0.00682 when into effect February 1, 2024, and remained in place through November 30, 2024.

Otter Tail Power has included the ECO tracker, Exhibit 1, ECO Tracker and Calculation of Proposed Average CCRA, which uses the Commission approved per-kWh method from December 2024 through October 2025. For November 2025 through October 2026, Otter Tail Power is proposing to change the average surcharge to $0.00585/kWh. Exhibit 2, Comparison of Monthly Bill Impacts, illustrates the monthly impacts for each of the Company's ten rate classes.

In Otter Tail Power's General Rate Case in Docket No. E017/GR-20-719, Otter Tail Power was approved to use its E2-E8760 allocator to distribute ECO costs to each of its ten rate classes based on the hourly energy costs to serve each class as ordered in Docket No. E017/GR-15-1033. Exhibit 3, Rate Calculation by Class, shows the computation of the ten class rates based on the E2-CIP allocators. Exhibit 4, Revenue Requirement, shows the calculation of the Revenue Requirement used in Exhibit 3. These values are calculated in Exhibit 1 as Line 7 for October 2025, the bottom sections Total for Lines 3, 4 and 5 and the reversal of Line 7 for October 2026.

Otter Tail Power has also included the prior year's ECO tracker, Exhibit 5, ECO Tracker and Calculations of CCRA, per the Department's request in Docket Nos. E017/M-20-451 and E017-M-21-228.

Calculation of CCRA

During the 22-month period from end of year 2024 through the end of October 2025, Otter Tail Power plans to increase the ECO Tracker balance of negative $3,194,438.62 to an estimated balance of $1,423,342 as illustrated in Table 2 below.

Otter Tail Power requests to increase the rate from $0.00555/kWh to $0.00585/kWh capping the rate increase at approximately 5 percent. Otter Tail Power has an increased ECO Program budget of $10.6 million in 2025 and 2026 which, if fully recovered, would increase the rate by 21 percent to $0.00672. While Otter Tail Power has full confidence in the programs they provide their customers, in reviewing actual spending in 2024, it determined that the Company would most likely not have program expenditures that reached the maximum budget levels in 2025 and 2026. Pairing this budget assumption with the concern of rate volatility, the Company decided that a 21 percent increase would not be in the best interests of its customers. Otter Tail Power would like to request a rate increase of 5 percent, an average rate of $0.00585 per kWh.

Table 2

	Jan 2025 - Oct 2025	Nov 2025 - Oct 2026
Beginning Balance	**($3,194,439)**	**($1,645,113)**
Carrying Charges	($59,979)	($16,360)
ECO Program Expenses	$6,952,646	$10,609,571
ECO Incentive Proposed	$1,964,142	$2,000,000
CCRA - ECO Rider	($7,307,484)	($9,524,756)
Ending Balance	**($1,645,113)**	**$1,423,342**
CCRA Method	**$0.00555/ kWh**	**$0.00585/ kWh**

In addition, Otter Tail Power estimates the following impacts to the ECO Tracker balance during the 22-month period:

- $21,450,021 of additional expenses from carrying charges, ECO incentive, and ECO program expenses.
- $16,832,240 collected from the CCRA, of which $9,524,756 will be collected during the 12 months from November 2025-October 2026.

As illustrated in Exhibit 1, the proposed change in the surcharge will increase the Average CCRA by approximately 5 percent. By November 1, 2026, the ECO tracker balance is projected to increase to an estimated $1,423,342. Otter Tail Power currently receives or pays a carrying charge on the outstanding ECO tracker account balance based on its short-term cost of debt rate. As approved in the Commission's September 26, 2015, Order, Docket No. E017/M-14-201, the monthly carrying charge on the ECO tracker-account balance has been set to the short-term cost of debt rate approved in the Company's last rate case. The MPUC's February 1, 2022, Order, Docket No. E017/GR-20-719, set the short-term cost of debt at 1.77 percent, effective January 1, 2021. Otter Tail Power applied this rate to the ECO tracker-account balance per the MPUC's order.

The amounts on lines 4 and 5 of Exhibit 1 reflect the projected expenditures and financial incentive for 2025 and 2026 through October 2026.

The proposed 2025/2026 Average CCRA is calculated assuming the rate is approved and is effective November 1, 2025. If implementation of the 2025/2026 CCRA occurs after November 1, 2025, the Average CCRA may need to be adjusted to recover the approved revenue requirement. If it is necessary to adjust the Average CCRA, Otter Tail Power proposes to calculate the final 2025/2026 CCRA rates and include them with the corresponding rate schedule pages in a compliance filing in this docket.

The redline and final versions of the ECO rider rate schedules are included directly following Exhibits 1 through 5. The ECO rider rate schedule included in this filing accommodates the change to the Average CCRA based on the proposed $0.00585/kWh method of recovery and will display the individual rates being applied to each of the ten class rates based on the E2-CIP allocators as shown in Exhibit 3. Once the 2025/2026 Average CCRA is approved, Otter Tail Power will file the corresponding rate schedule that complies with the Commission's Order in this docket.

Effective Date

Otter Tail Power has changed its requested effective date from the previous October 1st date to November 1st. This would allow for stakeholders and interested parties additional time to review the filing and reduces the risk of having to rerun rate calculations in the event an approval date is pushed back.

Administrative Tariff Changes

Otter Tail Power requests to make administrative changes to its Energy Conservation and Optimization (ECO) Rider tariff, these are a continuation of the changes requested in the last annual update to maintain consistency between the ECO Programs and its recovery mechanism. Otter Tail Power also requests to update the statutory reference to Large Customer Facility customers that have the eligibility to opt out of ECO Programs. With the new ECO legislation, the updated reference should be Minn. Stat. 216B.241, Subd. 1a (a) instead of the current Minn. Stat. 216B.241, Subd. 1a (b).

CONCLUSION

Otter Tail Power respectfully requests the following from the MPUC:

1. Approval of the 2024 CIP Tracker, resulting in a year-end balance of negative $3,194,439.

2. Approval to implement the Average CCRA factor of $0.00585/kWh reflected on customers' bills using the applicable rate in Exhibit 3 of the Conservation Cost Recovery Adjustment through the Resource Adjustment starting with bills rendered on and after November 1, 2025.

3. Approval of the administrative changes requested in the Request for Approval section of the Petition above to our Energy Conservation and Optimization Rider.

Exhibit 1 is Provided Separately as an Excel Spreadsheet

Otter Tail Power Company **Exhibit 2**

Comparison of Monthly Bill Impacts

ECO Surcharge (CCRA) is based on Class Rate Code shown in Exhibit 3

				Monthly Impacts			
Rate Class	**Bills**	**Average kWh/Bill**	**Average $/Bill before CCRA**	**Current CCRA**	**Proposed CCRA**	**Monthly Bill $ Change**	**Monthly Bill % Change**
Residential	49,223	762	$82.63	$4.16	$4.41	$0.25	0.30%
Farm	1,282	2,608	$258.16	$14.56	$15.18	$0.62	0.24%
General Service	10,366	2,627	$266.85	$14.17	$14.63	$0.46	0.17%
Large General Service	444	158,742	$15,803.34	$917.47	$950.86	$33.39	0.21%
Irrigation	217	1,535	$160.55	$4.66	$5.49	$0.83	0.52%
Outdoor Lighting	239,172	53	$11.89	$0.32	$0.34	$0.02	0.15%
OPA	541	2,876	$247.93	$13.99	$14.87	$0.88	0.35%
Deferred Load and Water Heating Control	8,161	316	$25.61	$1.69	$1.87	$0.18	0.72%
Interruptible Load	73,650	132	$7.97	$0.74	$0.88	$0.13	1.68%
Fixed Time of Delivery	239	5,359	$2,419.76	$24.30	$28.40	$4.10	0.17%

*All average data comes from Otter Tail's Schedule-E that was filed March 8, 2022, in compliance with the Commission's Findings of Fact, Conclusions, and Order dated February 1, 2022 (Docket No. E017/GR-20-719).

Otter Tail Power Company **Exhibit 3**
Rate Calculation by Class

Line No.	Class	E2-CIP Allocator[1]	Revenue Requirement	ECO kWh Sales	Rate
1	Residential	27.733%	$ 2,641,495	456,843,112	$0.00578
2	Farm	2.409%	$ 229,498	39,427,443	$0.00582
3	General Service	20.187%	$ 1,922,739	345,457,224	$0.00557
4	Large General Service	38.397%	$ 3,657,178	611,055,721	$0.00599
5	Irrigation	0.214%	$ 20,346	5,685,679	$0.00358
6	Outdoor Lighting	0.634%	$ 60,395	9,332,567	$0.00647
7	OPA	1.113%	$ 106,034	20,527,632	$0.00517
8	Deferred Load and Water Heating Control	1.720%	$ 163,812	27,688,227	$0.00592
9	Controlled Service Interupt	6.777%	$ 645,473	97,464,470	$0.00662
10	Controlled Service Off-Peak	0.817%	$ 77,787	14,681,371	$0.00530
11					
12	Total Revenue Requirements		$ 9,524,756	1,628,163,446	

1. Class E2-CIP allocation factor from Otter Tail's latest general rate case in Minnesota, E017-GR-20-719.

Otter Tail Power Company **Exhibit 4**

Revenue Requirement

-based on Exhibit 1 ECO Tracker and Calculation of Proposed CCRA

Line No.		**November 2025 - October 2026**
1	CIP Expenses	$10,609,571
2	Financial Incentive	$2,000,000
3	Carrying Cost	($16,360)
4	Prior Year End Balance (True up)	($1,645,113)
5	October 2026 Outstanding Balance*	($1,423,342)
6		
7	Total Revenue Requirement	$9,524,756

*Oustanding balance to protect customers from rate volatility

Exhibit 5 is Provided Separately as an Excel Spreadsheet

Redline and Clean Versions of Rate Schedule MN 13.02 – Energy Conservation and Optimization (ECO) Rider

ENERGY CONSERVATION AND OPTIMIZATION (ECO) RIDER

DESCRIPTION	RATE CODE
Residential	MCPRS
Farm	MCPFM
General Service	MCPGS
Large General Service	MCPLG
Irrigation Service	MCPIR
Outdoor Lighting	MCPLT
OPA	MCPOP
Controlled Service Deferred	MCPCD
Controlled Service Interruptible	MCPCI
Controlled Service Off Peak	MCPCO

RULES AND REGULATIONS: Terms and conditions of this electric rate schedule and the General Rules and Regulations govern use of this rider.

APPLICATION OF RIDER: This rider is applicable to any electric service under all of the Company's retail rate schedules in Sections 9, 10, 11, and 14, except for Standby Service, Section 11.01; Civil Defense – Fire Sirens, Section 11.06; Air Conditioning Control Rider, Section 14.08; Renewable Energy Rider, Section 14.09; and those customers who have been granted an exemption under a large customer facility. The exemptions are as follows:

"Large Customer Facility" customers that have been exempted from the Company's Energy Conservation and Optimization ~~Improvement Program~~ plan charges pursuant to Minn. Stat. 216B.241, Subd. 1a (a~~b~~) shall receive a monthly exemption from energy and conservation ~~improvement~~ and optimization ~~program~~ plan charges pursuant to Minn. Stat.216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation and optimization ~~program~~ plan charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation and Optimization Improvement ~~Program~~plan.

CONSERVATION SURCHARGE: There shall be added to each non-exempt Customer's bill a Conservation Surcharge, which shall be the Conservation Surcharge Rate multiplied by the customer's billing kWh for electric service. The Conservation Surcharge shall not be applied to Meter(s) on Customer Account(s) granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources (or successor agency) from ECO costs pursuant to Minn. Stat. 216B.241.

Service Category	Section	Rate per kWh
Residential	9.01, 9.02	$0.00578~~545 ¢kWh~~
Farm	9.03	$0.00582~~558 ¢kWh~~
General Service	10.01, 10.02, 10.03, 10.07	$0.00557~~540 ¢kWh~~
Large General Service	10.04, 10.05, 10.06, 14.02, 14.03	$0.00599~~578 ¢kWh~~
Irrigation Service	11.02	$0.00358~~304 ¢kWh~~
Outdoor Lighting	11.03, 11.04, 11.07	$0.00647~~613 ¢kWh~~
OPA	11.05	$0.00517~~487 ¢kWh~~
Controlled Service Deferred	14.01, 14.06	$0.00592~~534 ¢kWh~~
Controlled Service Interruptible	14.04	$0.00662~~561 ¢kWh~~
Controlled Service Off Peak	14.07, 14.12	$0.00530~~453 ¢kWh~~

DETERMINATION OF CONSERVATION SURCHARGE RATES: The Minnesota Public Utilities Commission (MNPUC) annually approves a Conservation Cost Recovery Adjustment (CCRA) which is used to develop the Conservation Surcharge for each Service Category. The approved CCRA is $0.00585~~5~~5. The Conservation Surcharge shall be the Recoverable ECO Tracker Balance multiplied by the Service Category's ECO energy allocator (E2), divided by the corresponding Service Category's projected Minnesota non-exempt retail energy sales for a designated 12-month recovery period. The Surcharge may be adjusted annually by approval of a change in the CCRA by the MNPUC. The Recoverable ECO Tracker Balance is determined as described below, starting with the MNPUC accepted ECO Tracker account balance as of the end of the prior year. From this starting point:

1. Add financial incentives awarded by the MNPUC not reflected in the prior year-end ECO Tracker balance;

2. Add current year ECO approved spending levels.

All costs appropriately charged to the ECO Tracker account shall be eligible for recovery through this Rider and all revenues received from the application of the Conservation Surcharge Factor shall be credited to the ECO Tracker account.

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

ENERGY CONSERVATION AND OPTIMIZATION (ECO) RIDER

DESCRIPTION	RATE CODE
Residential	MCPRS
Farm	MCPFM
General Service	MCPGS
Large General Service	MCPLG
Irrigation Service	MCPIR
Outdoor Lighting	MCPLT
OPA	MCPOP
Controlled Service Deferred	MCPCD
Controlled Service Interruptible	MCPCI
Controlled Service Off Peak	MCPCO

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"Large Customer Facility" customers that have been exempted from the Company's Energy Conservation and Optimization plan charges pursuant to Minn. Stat. 216B.241, Subd. 1a (a) shall receive a monthly exemption from energy and conservation and optimization plan charges pursuant to Minn. Stat.216B.16, subd. 6b Energy Conservation Improvement. Such monthly exemption will be effective beginning January 1 of the year following the grant of exemption. Upon exemption from conservation and optimization plan charges, the "Large Customer Facility" customers can no longer participate in the Company's Energy Conservation and Optimization Improvement plan. C C C C C

CONSERVATION SURCHARGE: There shall be added to each non-exempt Customer's bill a Conservation Surcharge, which shall be the Conservation Surcharge Rate multiplied by the customer's billing kWh for electric service. The Conservation Surcharge shall not be applied to Meter(s) on Customer Account(s) granted exemption by the Commissioner of the Minnesota Department of Commerce, Division of Energy Resources (or successor agency) from ECO costs pursuant to Minn. Stat. 216B.241.

Service Category	Section	Rate per kWh	
Residential	9.01, 9.02	$0.00578	**CR**
Farm	9.03	$0.00582	**CR**
General Service	10.01, 10.02, 10.03, 10.07	$0.00557	**CR**
Large General Service	10.04, 10.05, 10.06, 14.02, 14.03	$0.00599	**CR**
Irrigation Service	11.02	$0.00358	**CR**
Outdoor Lighting	11.03, 11.04, 11.07	$0.00647	**CR**
OPA	11.05	$0.00517	**CR**
Controlled Service Deferred	14.01, 14.06	$0.00592	**CR**
Controlled Service Interruptible	14.04	$0.00662	**CR**
Controlled Service Off Peak	14.07, 14.12	$0.00530	**CR**

DETERMINATION OF CONSERVATION SURCHARGE RATES: The Minnesota Public Utilities Commission (MNPUC) annually approves a Conservation Cost Recovery Adjustment (CCRA) which is used to develop the Conservation Surcharge for each Service Category. The approved CCRA is $0.00585. The Conservation Surcharge shall be the Recoverable ECO Tracker Balance multiplied by the Service Category's ECO energy allocator (E2), divided by the corresponding Service Category's projected Minnesota non-exempt retail energy sales for a designated 12-month recovery period. The Surcharge may be adjusted annually by approval of a change in the CCRA by the MNPUC. The Recoverable ECO Tracker Balance is determined as described below, starting with the MNPUC accepted ECO Tracker account balance as of the end of the prior year. From this starting point: **R**

1. Add financial incentives awarded by the MNPUC not reflected in the prior year-end ECO Tracker balance;

2. Add current year ECO approved spending levels.

All costs appropriately charged to the ECO Tracker account shall be eligible for recovery through this Rider and all revenues received from the application of the Conservation Surcharge Factor shall be credited to the ECO Tracker account.

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply and by any Voluntary Rate Riders selected by the Customer, unless otherwise noted in this schedule. See Sections 12.00, 13.00 and 14.00 of the Minnesota electric rates for the matrices of riders.

Appendix A – Tables

Table 1
2024 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN ECO TRACKER ACCOUNT
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 1.77% (D)	Balance Account 1860.3000 + 1860.3100 (E)
Balance Dec. 31, 2023					(3,321,342.57)
January:					
Carrying Charge	--	--	--	(4,898.98)	(4,898.98)
Prior Year Adjustment					
Labor Accrual Adj					0.00
Activity	0.00	270,191.16	(950,677.91)	--	(680,486.75)
Deferred Taxes	--	--	--	--	--
Balance January 31, 2024	0.00	270,191.16	(950,677.91)	(4,898.98)	(4,006,728.30)
February:					
Carrying Charge	--	--	--	(5,909.92)	(5,909.92)
Labor Accrual Adj					0.00
Activity	0.00	538,740.52	(930,621.65)	--	(391,881.13)
Deferred Taxes	--	--	--	--	--
Balance February 28, 2024	0.00	808,931.68	(1,881,299.56)	(10,808.90)	(4,404,519.35)
March:					
Carrying Charge	--	--	--	(6,496.67)	(6,496.67)
Labor Accrual Adj					0.00
Activity	0.00	355,141.34	(901,069.75)	--	(545,928.41)
Deferred Taxes	--	--	--	--	--
Balance March 31, 2024	0.00	1,164,073.02	(2,782,369.31)	(17,305.57)	(4,956,944.43)
April:					
Carrying Charge	--	--	--	(7,311.49)	(7,311.49)
Labor Accrual Adj					0.00
Activity	0.00	559,760.13	(895,370.94)	--	(335,610.81)
Deferred Taxes	--			--	--
Balance April 30, 2024	0.00	1,723,833.15	(3,677,740.25)	(24,617.06)	(5,299,866.73)
May:					
Carrying Charge	--	--	--	(7,817.30)	(7,817.30)
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	445,436.88	(792,620.30)	--	(347,183.42)
Deferred Taxes	--	--	--	--	--
Balance May 31, 2024	0.00	2,169,270.03	(4,470,360.55)	(32,434.37)	(5,654,867.45)
June:					
Carrying Charge	--	--	--	(8,340.93)	(8,340.93)
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	464,125.11	(734,741.87)	--	(270,616.76)
Deferred Taxes	--	--	--	--	--
Balance June 30, 2024	0.00	2,633,395.14	(5,205,102.42)	(40,775.30)	(5,933,825.14)
July:					
Carrying Charge	--	--	--	(8,752.39)	(8,752.39)
Bonus/Incentive					0.00
Labor Accrual Adj					
Activity	0.00	683,460.66	(835,317.14)	--	(151,856.48)
Deferred Taxes	--	--	--	--	--
Balance July 31, 2024	0.00	3,316,855.80	(6,040,419.56)	(49,527.69)	(6,094,434.01)

Table 1
2024 CALCULATION OF CARRYING CHARGE ON CONSERVATION DOLLARS HELD IN ECO TRACKER ACCOUNT
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	Capital Expenditures (A)	Operating Expenses (B)	Revenues Received (C)	Dr. 1860.3100 Cr. 4310.4000 Carrying Charge 1.77% (D)	Balance Account 1860.3000 + 1860.3100 (E)
August:					
Carrying Charge	--	--		(8,989.29)	(8,989.29)
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	513,905.72	(936,041.98)	--	(422,136.26)
Deferred Taxes	--	--	--	--	--
Balance August 31, 2024	0.00	3,830,761.52	(6,976,461.54)	(58,516.98)	(6,525,559.56)
September:					
Carrying Charge	--	--	--	(9,625.20)	(9,625.20)
Lost Margin & Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	519,284.80	(864,170.03)	--	(344,885.23)
Deferred Taxes	--	--	--	--	--
Balance September 30, 2024	0.00	4,350,046.32	(7,840,631.57)	(68,142.18)	(6,880,070.00)
October:					
Carrying Charge	--		--	(10,148.10)	(10,148.10)
Lost Margin & Bonus/Incentive		2,705,283.00			2,705,283.00
Labor Accrual Adj					0.00
Activity	0.00	837,759.48	(807,607.99)	--	30,151.49
Deferred Taxes	--	--	--	--	--
Balance October 31, 2024	0.00	7,893,088.80	(8,648,239.56)	(78,290.28)	(4,154,783.61)
November:					
Carrying Charge	--		--	(6,128.31)	(6,128.31)
Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	919,107.39	(849,423.33)	--	69,684.06
Deferred Taxes	--	--	--	--	--
Balance November 30, 2024	0.00	8,812,196.19	(9,497,662.89)	(84,418.59)	(4,091,227.85)
December:					
Carrying Charge	--	--	--	(6,034.56)	(6,034.56)
Lost Margin & Bonus/Incentive					0.00
Labor Accrual Adj					0.00
Activity	0.00	1,788,860.93	(886,037.14)	--	902,823.79
Deferred Taxes	--	--	--	--	--
Balance December 31, 2024	0.00	10,601,057.12	(10,383,700.03)	(90,453.15)	(3,194,438.63)

Table 2
2024 Financial Mechanism
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

Inputs	2024
3-year Weather-Normalized Sales Average (kWh)	1,617,718,515
2.2% Energy Savings	35,589,807
Approved ECO Budget	$8,032,051
Approved ECO Energy Goal	50,999,311
Estimated Net Benefits at Approved Goal	$115,358,078

Incentive Calibration	2024
Max Percent of Benefits Awarded	5.5%
Earning Threshold	1.0%
Max Achievement Level	2.2%
Max Percent of Expenditures if savings ≤ 2.2%	20.0%
Max Percent of Expenditures if savings > 2.2%	25.0%

Estimated Incentive Levels (2024)

Achievement Level (% of Sales)	Energy Saved	Percent of Net Benefits Awarded	Estimated Net Benefits Achieved
1.50%	24,265,778	1.30%	$713,545
1.6%	25,883,496	1.90%	$1,112,398
1.7%	27,501,215	2.50%	$1,555,162
1.8%	29,118,933	3.10%	$2,041,836
1.9%	30,736,652	3.70%	$2,572,421
2.0%	32,354,370	4.30%	$3,146,916
2.1%	33,972,089	4.90%	$3,765,321
2.2%	35,589,807	5.50%	$4,427,637

Actual Electric ECO Incentive Results	2024
Spending with Incentive	$9,763,791
Spending without Incentive	$7,895,824
Energy Saved	50,321,324
Net Benefits Achieved with Incentive	$33,963,044
Net Benefits without Incentive	$35,831,011
Resulting Incentive	
Achievement Level	3.11%
Percent of Net Benefits Awarded	$1,867,967
Expenditure Cap	$1,970,706
Financial Incentive Award	**$1,867,967**

Incentive/First Year kWh Saved $	$0.0371
Incentive/Net Benefits	5.50%
Incentive/ECO Expenditures	23.66%

Cost per kWh	$0.16

Table 3
2024 PROJECT COSTS, SAVINGS, AND BENEFITS
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	2024 Proposed Savings, Costs, and Benefits				2024 Actual Savings, Costs, and Benefits			
	kWh Savings	**Expenditures**	**Total Benefits**	**Net Benefits**	**kWh Savings**	**Expenditures**	**Total Benefits**	**Net Benefits**
Residential								
Home Appliance	371,535	$183,000	$242,556	$59,556	315,180	$170,601	$192,998	$22,397
Home Direct Install	1,416,284	$137,000	$1,244,107	$1,107,107	1,389,044	$150,963	$1,219,409	$1,068,445
Home Energy Feedback	3,755,119	$340,000	$834,688	$494,688	3,673,982	$220,387	$880,842	$660,455
Home Energy Management	406,181	$116,000	$815,915	$699,915	403,646	$87,658	$1,302,264	$1,214,605
Home Heating & Cooling	3,726,936	$915,600	$4,594,456	$3,678,856	5,973,867	$1,166,518	$6,985,763	$5,819,245
Home Lighting	3,291,794	$644,000	$3,255,469	$2,611,469	2,694,184	$511,854	$2,881,225	$2,369,371
Residential Energy Code Compliance	-	$30,000	-	($30,000)	-	$17,768	-	($17,768)
Advertising and Education	-	$193,500	-	($193,500)	-	$166,297	-	($166,297)
Implementation and Training	-	$38,000	-	($38,000)	-	$132,491	-	($132,491)
Total Residential	12,967,849	$2,597,100	$10,987,190	$8,390,090	14,449,903	$2,624,537	$13,462,500	$10,837,963
Low-Income								
House Therapy	227,947	$317,000	$245,255	($71,745)	107,122	$255,085	$100,736	($154,349)
Low-Income Home Energy Feedback	1,209,252	$85,000	$237,454	$152,454	1,173,804	$72,617	$281,421	$208,805
Total Low-Income	1,437,199	$402,000	$482,709	$80,709	1,280,926	$327,701	$382,157	$54,455
Commercial								
Commercial Audits & Studies	2,727,190	$319,000	$1,210,987	$891,987	687,003	$143,706	$519,263	$375,557
Commercial Direct Install	185,895	$66,000	$111,447	$45,447	44,843	$30,924	$21,868	($9,056)
Commercial Energy Management	11,119	$24,000	$44,244	$20,244	7,234	$4,533	$10,021	$5,488
Commercial Heat Pumps	3,328,671	$669,650	$4,235,873	$3,566,223	2,486,061	$520,078	$2,606,916	$2,086,838
Commercial & Industrial Process Efficiency	2,478,461	$657,000	$2,830,273	$2,173,273	2,331,848	$473,955	$2,022,601	$1,548,645
Commercial Lighting	11,769,620	$1,296,000	$7,421,284	$6,125,284	11,418,027	$981,325	$8,538,385	$7,557,060
Compressed Air Efficiency	726,912	$71,000	$717,018	$646,018	113,546	$18,522	$186,348	$167,827
Custom Effiency Grants	2,979,450	$334,000	$3,208,042	$2,874,042	1,847,925	$335,499	$2,087,701	$1,752,202
Drive Power	6,311,175	$374,000	$6,014,977	$5,640,977	11,875,304	$606,834	$11,354,535	$10,747,701
Refrigeration	2,392,250	$181,000	$1,738,183	$1,557,183	341,091	$40,828	$126,690	$85,862
Commercial Energy Code Compliance	532,990	$25,000	$40,274	$15,274	-	$18,380	-	($18,380)
Advertising and Education	-	$28,500	-	($28,500)	-	$29,877	-	($29,877)
Integrated Building Design Plus	-	$252,000	-	($252,000)	-	$145,661	-	($145,661)
Financing	-	$15,000	-	($15,000)	-	$7,766	-	($7,766)
Implementation and Training	-	$200,000	-	($200,000)	-	$160,466	-	($160,466)
Total Commercial	33,443,733	$4,512,150	$27,572,605	$23,060,455	31,152,881	$3,518,353	$27,474,328	$23,955,975
Fuel Switching								
Home Heating & Cooling Fuel Switching	1,517,184	$150,000	$1,673,468	$1,523,468	1,251,917	$110,395	$1,198,832	$1,088,437
Electric Vehicle Residential	1,282,746	$194,000	$655,681	$461,681	563,703	$111,304	$298,142	$186,839
Commercial Heat Pumps Fuel Switching	766,330	$104,400	$693,956	$589,556	665,768	$69,069	$512,193	$443,125
Electric Vehicle Commercial	250,375	$14,000	$102,062	$88,062	439,542	$17,691	$144,101	$126,409
Total Fuel Switching	3,816,635	$462,400	$3,125,167	$2,662,767	2,920,930	$308,459	$2,153,268	$1,844,810
Load Management								
Load Management	-	$311,500	$7,590,778	$7,279,278	-	$198,826	$1,299,276	$1,100,450
Total Load Management	-	$311,000	$7,590,778	$7,279,778	-	$198,826	$1,299,276	$1,100,450
Other								
Efficient Technology Accelerator	-	$116,167	$0	($116,167)	0	$117,832	$0	($117,832)
Publicly-Owned Property Solar	1,412,480	$1,000,000	$3,209,942	$2,209,942	516,684	$432,763	$1,167,301	$734,539
Total Other	1,412,480	$1,116,167	$3,209,942	$2,093,775	516,684	$550,595	$1,167,301	$616,707
Program Development and Regulatory Requirements								
Planning - Regulatory Affairs	-	$280,000	-	($280,000)	-	$217,516	-	($217,516)
Research and Development	-	$150,000	-	($150,000)	-	$69,302	-	($69,302)
NGEA - Regulatory Assessments	-	$125,000	-	($125,000)	-	$78,524	-	($78,524)
PUC Assessments	-	$15,000	-	($15,000)	-	$2,010	-	($2,010)
Total Development and Regulatory		$570,000	-	($570,000)	-	$367,353	-	($367,353)
Total - All ECO	**53,077,896**	**$10,064,451**	**$52,968,392**	**$42,903,941**	**50,321,324**	**$7,895,824**	**$45,938,830**	**$38,043,006**

Table 4
2024 ECO Program Status Report / ECO Tracker Recap
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	As Filed - 2024 Proposed Benefit/Cost Ratios					Actual - 2024 Benefit/Cost Ratios				
	MN Test	Utility Test	RIM Test	Societal Test	Participant Test	MN Test	Utility Test	RIM Test	Societal Test	Participant Test
Residential										
Home Appliance	1.23	0.67	0.28	1.17	7.01	1.08	0.61	0.26	1.13	5.78
Home Direct Install	5.55	2.65	0.34	9.69	0.00	5.80	3.97	0.37	38.24	0.00
Home Energy Feedback	2.34	2.00	0.99	2.34	0.00	3.80	2.47	0.42	4.00	0.00
Home Energy Management	6.92	6.81	5.04	5.04	0.96	14.65	14.72	10.01	7.51	0.53
Home Heating & Cooling	3.76	1.85	0.34	1.16	2.13	4.65	2.92	0.38	1.25	1.91
Home Lighting	3.69	1.70	0.31	1.60	3.15	4.37	2.64	0.34	1.30	2.17
Residential Energy Code Compliance	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Advertising and Education	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Implementation and Training	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Residential	3.37	1.84	0.40	1.55	2.92	4.22	2.78	0.44	1.55	2.38
Low-Income										
House Therapy	0.73	0.35	0.19	2.82	0.00	0.39	0.17	0.11	2.89	0.00
Low-Income Home Energy Feedback	2.63	2.20	0.95	2.63	0.00	3.69	2.39	0.42	3.88	0.00
Total Low-Income	1.14	0.75	0.38	2.72	0.00	1.13	0.67	0.27	3.56	0.00
Commercial										
Commercial Audits & Studies	3.04	1.60	0.45	2.98	7.77	3.27	2.46	0.67	1.94	2.58
Commercial Direct Install	1.59	0.82	0.13	2.32	0.00	0.68	0.37	0.21	0.81	0.00
Commercial Energy Management	1.84	1.82	1.49	1.84	0.00	2.20	2.16	1.60	2.21	0.00
Commercial Heat Pumps	4.49	2.22	0.43	1.31	1.60	4.06	2.53	0.42	1.28	1.58
Commercial & Industrial Process Efficiency	3.62	2.31	0.59	0.79	0.84	3.65	2.45	0.57	1.71	1.78
Commercial Lighting	4.19	2.23	0.48	1.51	1.78	6.28	4.68	0.55	1.69	1.69
Compressed Air Efficiency	5.77	2.60	0.47	3.69	5.14	7.43	5.83	0.72	3.93	3.42
Custom Effiency Grants	5.99	3.11	0.56	1.62	1.63	4.93	3.29	3.29	9.82	0.00
Drive Power	7.52	3.58	0.48	3.70	4.85	9.75	9.15	0.55	5.30	4.83
Refrigeration	5.81	2.89	0.50	2.53	3.06	2.74	1.73	0.48	1.26	1.56
Commercial Energy Code Compliance	1.47	0.85	0.38	1.47	0.00	0.00	0.00	0.00	0.00	0.00
Advertising and Education	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Integrated Building Design Plus	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Financing	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Implementation and Training	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Total Commercial	4.38	2.28	0.48	1.60	1.92	5.95	4.24	0.57	2.44	2.30
Fuel Switching										
Home Heating & Cooling Fuel Switching	6.11	2.75	0.33	1.64	2.46	10.86	4.45	0.28	2.78	4.15
Electric Vehicle Residential	2.65	1.13	0.22	0.73	1.41	2.68	1.16	0.22	0.18	0.34
Commercial Heat Pumps Fuel Switching	4.51	2.00	0.43	1.07	1.12	7.42	2.95	0.40	2.76	2.78
Electric Vehicle Commercial	4.55	1.89	0.37	0.36	0.37	8.15	3.55	0.41	2.35	2.56
Total Fuel Switching	4.48	1.98	0.32	1.09	1.60	6.98	2.87	0.29	0.91	1.28
Load Management										
Load Management	24.37	24.37	7.95	13.61	2.09	6.53	6.53	3.43	8.04	4.39
Total Load Management	24.37	24.37	7.95	13.61	2.09	6.53	6.53	3.43	8.04	4.39
Other										
Efficient Technology Accelerator	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Publicly-Owned Property Solar	2.77	1.55	0.52	1.25	1.38	2.47	1.51	0.54	1.11	1.14
Total Other	2.52	1.41	0.50	1.20	1.38	1.98	1.19	0.49	0.99	1.14
Program Development and Regulatory Requirements										
Planning - Regulatory Affairs										
Research and Development										
NGEA - Regulatory Assessments										
PUC Assessments										
Total Development and Regulatory										
Total - All ECO	3.13	2.45	0.57	1.69	2.07	4.78	3.34	0.52	1.93	2.21

Table 5
2024 PROJECT COSTS, SAVINGS, AND BENEFITS
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	2024 Expenditures			2024 Participation			2024 Energy Savings - kWh			2024 Coincident Demand Savings - kW			2024 MN Benefits		
	Actual	Budget	% of Goal	Actual	Budget	% of Goal	Actual	Budget*	% of Goal	Actual	Budget	% of Goal	Actual	Budget	% of Goal
Residential															
Home Appliance	$ 170,601	$ 183,000	93%	1,118	829	135%	315,180	371,535	85%	40.61	51.07	80%	$ 192,998	$ 242,556	80%
Home Direct Install	$ 150,963	$ 137,000	110%	16,831	16,850	100%	1,389,044	1,414,236	98%	121.37	124.07	98%	$ 1,219,409	$ 1,244,107	98%
Home Energy Feedback	$ 220,387	$ 340,000	65%	29,860	33,500	89%	3,673,982	3,755,119	98%	1,526.37	4,751.67	32%	$ 880,842	$ 834,688	106%
Home Energy Management	$ 87,658	$ 116,000	76%	18,691	18,906	99%	403,646	406,181	99%	10,188.57	5,955.31	171%	$ 1,302,264	$ 815,915	160%
Home Heating & Cooling	$ 1,166,518	$ 915,600	127%	1,013	1,176	86%	5,973,867	3,726,936	160%	655.05	404.45	162%	$ 6,985,763	$ 4,594,456	152%
Home Lighting	$ 511,854	$ 657,000	78%	127,780	187,765	68%	2,694,184	3,168,913	85%	204.86	246.58	83%	$ 2,881,225	$ 3,255,469	89%
Residential Energy Code Compliance	$ 17,768	$ 30,000	59%	-	-	N/A	-	-	-	-	-	-	$ -	$ -	-
Advertising and Education	$ 166,297	$ 193,500	86%	114,125	15,000	761%	-	-	-	-	-	-	$ -	$ -	-
Implementation and Training	$ 132,491	$ 38,000	349%	51	175	29%	-	-	-	-	-	-	$ -	$ -	-
Total Residential	$ 2,624,537	$ 2,610,100	101%	309,469	274,201	113%	14,449,903	12,842,920	113%	12,736.82	11,533.14	110%	$ 13,462,500	$ 10,987,190	123%
Low-Income															
House Therapy	255,085	$ 317,000	80%	798	1,651	48%	107,122	227,947	47%	5.94	28.54	21%	$ 100,736	$ 245,255	41%
Low-Income Home Energy Feedback	72,617	$ 85,000	85%	9,540	10,000	95%	1,173,804	1,209,252	97%	487.66	1,280.06	38%	$ 281,421	$ 237,454	119%
Total Low-Income	327,701	$ 402,000	82%	10,338	11,651	89%	1,280,926	1,437,199	89%	493.60	1,308.60	38%	$ 382,157	$ 482,709	79%
Commercial															
Commercial Audits & Studies	143,706	$ 319,000	45%	107	86	124%	687,003	2,727,190	25%	302.89	333.26	91%	$ 519,263	$ 1,210,987	43%
Commercial Direct Install	30,924	$ 67,000	46%	702	2,645	27%	44,843	207,253	22%	5.58	23.63	24%	$ 21,868	$ 111,447	20%
Commercial Energy Management	4,533	$ 24,000	19%	334	512	65%	7,234	11,119	65%	76.18	347.16	22%	$ 10,021	$ 44,244	23%
Commercial Heat Pumps	520,078	$ 675,000	77%	227	311	73%	2,486,061	3,284,422	76%	308.77	360.40	86%	$ 2,606,916	$ 4,235,873	62%
Commercial & Industrial Process Efficiency	473,955	$ 657,000	72%	18	26	69%	2,331,848	2,478,461	94%	520.76	1,096.86	47%	$ 2,022,601	$ 2,830,273	71%
Commercial Lighting	981,325	$ 1,546,000	63%	781	1,015	77%	11,418,027	9,876,027	116%	1,756.54	2,044.30	86%	$ 8,538,385	$ 7,421,284	115%
Compressed Air Efficiency	18,522	$ 71,000	26%	10	16	63%	113,546	726,912	16%	37.62	56.91	66%	$ 186,348	$ 717,018	26%
Custom Effiency Grants	335,499	$ 334,000	100%	28	18	156%	1,847,925	2,979,450	62%	380.28	556.16	68%	$ 2,087,701	$ 3,208,042	65%
Drive Power	606,834	$ 374,000	162%	597	388	154%	11,875,304	6,311,175	188%	1,274.47	691.13	184%	$ 11,354,535	$ 6,014,977	189%
Refrigeration	40,828	$ 181,000	23%	41	113	36%	341,091	2,392,250	14%	59.25	303.67	20%	$ 126,690	$ 1,738,183	7%
Commercial Energy Code Compliance	18,380	$ 25,000	74%	0	1	0%	-	532,990	0%	-	60.84	0%	$ -	$ 40,274	0%
Advertising and Education	29,877	$ 28,500	105%	0	1	0%	-	-	-	-	-	-	$ -	$ -	-
Integrated Building Design Plus	145,661	$ 252,000	58%	4	6	67%	-	-	-	-	-	-	$ -	$ -	-
Financing	7,766	$ 15,000	52%	0	5	0%	-	-	-	-	-	-	$ -	$ -	-
Implementation and Training	160,466	$ 200,000	80%	415	250	166%	-	-	-	-	-	-	$ -	$ -	-
Total Commercial	3,518,353	$ 4,512,150	78%	3,264	5,091	64%	31,152,881	31,490,078	99%	4,722.34	5,874.33	80%	$ 27,474,328	$ 27,572,605	100%
Fuel Switching															
Home Heating & Cooling Fuel Switching	110,395	$ 150,000	74%	74	85	87%	1,251,917	1,517,184	83%	-	100.79	0%	$ 1,198,832	$ 1,673,468	72%
Electric Vehicle Residential	111,304	$ 194,000	57%	303	178	170%	563,703	1,282,746	44%	-	-	-	$ 298,142	$ 655,681	45%
Commercial Heat Pumps Fuel Switching	69,069	$ 104,400	66%	40	62	65%	665,768	766,330	87%	-	49.77	0%	$ 512,193	$ 693,956	74%
Electric Vehicle Commercial	17,691	$ 14,000	126%	6	7	86%	439,542	250,375	176%	-	-	-	$ 144,101	$ 102,062	141%
Total Fuel Switching	308,459	$ 462,400	67%	423	332	127%	2,920,930	3,816,635	77%	-	150.56	0%	$ 2,153,268	$ 3,125,167	69%
Load Management															
Load Management	198,826	$ 311,500	64%	1,679	10,241	16%	0	0	0%	10,369.23	60,580.30	17%	$ 1,299,276	$ 7,590,778	17%
Total Load Management	198,826	$ 311,000	64%	1,679	10,241	16%	0	0	0%	10,369.23	60,580.30	17%	$ 1,299,276	$ 7,590,778	17%
Other															
Efficient Technology Accelerator	117,832	$ 116,167	101%	0	1	0%	0	0	0%	-	-	-	$ -	$ -	-
Publicly-Owned Property Solar	432,763	$ 1,000,000	43%	9	16	56%	516,684	1,412,480	0%	222.55	706.24	0	$ 1,167,301	$ 3,209,942	36%
Total Other	550,595	$ 1,116,167	53%	9	17	53%	516,684	1,412,480	37%	222.55	706.24	32%	$ 1,167,301	$ 3,209,942	36%
Program Development and Regulatory Requirements											-				
Planning - Regulatory Affairs	217,516	$ 280,000	78%	-	-	0%	-	-	0%	-	-	-	$ -	$ -	-
Research and Development	69,302	$ 150,000	46%	-	-	0%	-	-	0%	-	-	-	$ -	$ -	-
NGEA - Regulatory Assessments	78,524	$ 125,000	63%	-	-	0%	-	-	0%	-	-	-	$ -	$ -	-
PUC Assessments	2,010	$ 15,000	13%	-	-	0%	-	-	0%	-	-	-	$ -	$ -	-
Total Development and Regulatory	367,353	$ 570,000	64%	-	-	0%	-	-	0%	-		-	$ -	$ -	-
Total - All ECO	**7,895,824**	**$ 10,064,451**	**78%**	**325,181**	**296,234**	**110%**	**50,321,324**	**50,999,311**	**99%**	**28,544.55**	**80,153.17**	**36%**	**$ 45,938,830**	**$ 52,968,392**	**87%**

Table 6
2024 PROJECT COSTS, SAVINGS, AND BENEFITS
Financial Incentive Projects - Energy Conservation and Optimization Programs
Otter Tail Power Company

	2024 Expenditures		2024 Energy Savings - kWh		2024 Lifetime Savings - kWh		Cost per kWh		2024 Coincident Demand Savings - kW		Cost per kW	
	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget	Actual	Budget
Residential												
Home Appliance	$ 170,601	$ 183,000	315,180	371,535	2,755,969	3,249,466	$ 0.54	$0.49	40.61	51.07	$ 4,200.99	$3,583.32
Home Direct Install	$ 150,963	$ 137,000	1,389,044	1,414,236	18,978,244	19,390,534	$ 0.15	$0.10	121.37	124.07	$ 1,243.88	$1,104.25
Home Energy Feedback	$ 220,387	$ 340,000	3,673,982	3,755,119	3,673,982	3,755,119	$ 0.06	$0.09	1,526.37	4,751.67	$ 144.39	$71.55
Home Energy Management	$ 87,658	$ 116,000	403,646	406,181	403,646	406,181	$ 0.22	$0.29	10,188.57	5,955.31	$ 8.60	$19.48
Home Heating & Cooling	$ 1,166,518	$ 915,600	5,973,867	3,726,936	107,470,491	67,582,721	$ 0.25	$0.25	655.05	404.45	$ 1,780.80	$2,263.83
Home Lighting	$ 511,854	$ 644,000	2,694,184	3,168,913	46,924,400	53,621,169	$ 0.24	$0.20	204.86	246.58	$ 2,498.61	$2,611.76
Residential Energy Code Compliance	$ 17,768	$ 30,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Advertising and Education	$ 166,297	$ 193,500	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Implementation and Training	$ 132,491	$ 38,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Total Residential	$ 2,624,537	$ 2,597,100	14,449,903	12,842,920	180,206,733	148,005,190	$ 0.18	$ 0.20	12,736.82	11,533.14	$ 206.06	$225.19
Low-Income												
House Therapy	$ 255,085	$ 317,000	107,122	227,947	1,780,063	3,762,195	$ 2.38	$1.39	5.94	28.54	$ 42,932.99	$11,108.15
Low-Income Home Energy Feedback	$ 72,617	$ 85,000	1,173,804	1,209,252	1,173,804	1,209,252	$ 0.06	$0.07	487.66	1,280.06	$ 148.91	$66.40
Total Low-Income	$ 327,701	$ 402,000	1,280,926	1,437,199	2,953,867	4,971,447	$ 0.18	$ 0.28	493.60	1,308.60	$ 663.90	$307.20
Commercial												
Commercial Audits & Studies	$ 143,706	$ 319,000	687,003	2,727,190	4,846,262	17,534,394	$ 0.23	$0.12	302.89	333.26	$ 474.44	$957.22
Commercial Direct Install	$ 30,924	$ 66,000	44,843	170,081	322,854	1,648,440	$ 0.71	$0.39	5.58	22.78	$ 5,540.34	$2,897.48
Commercial Energy Management	$ 4,533	$ 24,000	7,234	11,119	7,234	11,119	$ 0.63	$2.16	76.18	347.16	$ 59.50	$69.13
Commercial Heat Pumps	$ 520,078	$ 669,650	2,486,061	3,284,422	38,881,131	62,104,844	$ 0.26	$0.20	308.77	336.68	$ 1,684.33	$1,988.99
Commercial & Industrial Process Efficiency	$ 473,955	$ 657,000	2,331,848	2,478,461	25,787,988	27,874,410	$ 0.24	$0.27	520.76	1,096.86	$ 910.11	$598.98
Commercial Lighting	$ 981,325	$ 1,296,000	11,418,027	9,876,027	121,045,915	121,468,901	$ 0.12	$0.13	1,756.54	1,625.40	$ 558.67	$797.34
Compressed Air Efficiency	$ 18,522	$ 71,000	113,546	726,912	2,097,705	11,817,392	$ 0.22	$0.10	37.62	56.91	$ 492.38	$1,247.69
Custom Effiency Grants	$ 335,499	$ 334,000	1,847,925	2,979,450	28,138,637	44,691,750	$ 0.23	$0.11	380.28	556.16	$ 882.25	$600.54
Drive Power	$ 606,834	$ 374,000	11,875,304	6,311,175	178,129,562	94,391,937	$ 0.10	$0.06	1,274.47	691.13	$ 476.15	$541.14
Refrigeration	$ 40,828	$ 181,000	341,091	2,392,250	1,738,652	26,171,308	$ 0.14	$0.08	59.25	303.67	$ 689.14	$596.04
Commercial Energy Code Compliance	$ 18,380	$ 25,000	-	532,990	-	532,990	$ -	$0.05	-	60.84	$ -	$410.89
Advertising and Education	$ 29,877	$ 28,500	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Integrated Building Design Plus	$ 145,661	$ 252,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Financing	$ 7,766	$ 15,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Implementation and Training	$ 160,466	$ 200,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Total Commercial	$ 3,518,353	$ 4,512,150	31,152,881	31,490,078	400,995,939	408,247,485	$ 0.11	$ 0.14	4,722.34	5,430.85	$ 745.04	$830.84
Fuel Switching												
Home Heating & Cooling Fuel Switching	$ 110,395	$ 150,000	1,251,917	1,517,184	22,534,499	27,476,388	$ 0.09	$0.10	-	100.79	$ -	$1,488.25
Electric Vehicle Residential	$ 111,304	$ 194,000	563,703	1,282,746	5,467,993	11,750,782	$ 0.20	$0.15	-	-	$ -	$0.00
Commercial Heat Pumps Fuel Switching	$ 69,069	$ 104,400	665,768	766,330	9,986,520	11,749,805	$ 0.10	$0.14	-	49.77	$ -	$2,097.74
Electric Vehicle Commercial	$ 17,691	$ 14,000	439,542	250,375	2,637,253	1,870,224	$ 0.04	$0.06	-	-	$ -	$0.00
Total Fuel Switching	$ 308,459	$ 462,400	2,920,930	3,816,635	40,626,265	52,847,199	$ 0.11	$ 0.12	-	150.56	$ -	$3,071.26
Load Management												
Load Management	$ 198,826	$ 311,500	-	-	-	-	$ -	$ -	10,369.23	60,580.30	$ 19.17	$5.14
Total Load Management	$ 198,826	$ 311,000	-	-	-	-	$ -	$ -	10,369.23	60,580.30	$ 19.17	$5.13
Other												
Efficient Technology Accelerator	$ 117,832	$ 116,167	-	-	-	-	$ -	$ -	0.00	-	$ -	$0.00
Publicly-Owned Property Solar	$ 432,763	$ 1,000,000	516,684	1,412,480	12,917,094	35,312,000	$ 0.92	$0.71	222.55	706.24	$ 1,944.61	$1,415.95
Total Other	$ 550,595	$ 1,116,167	516,684	1,412,480	12,917,094	35,312,000	$ 1.07	$ 0.79	222.55	706.24	$ 5,015.47	$126.26
Program Development and Regulatory Requirements												
Planning - Regulatory Affairs	$ 217,516	$ 280,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Research and Development	$ 69,302	$ 150,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
NGEA - Regulatory Assessments	$ 78,524	$ 125,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
PUC Assessments	$ 2,010	$ 15,000	-	-	-	-	$ -	$ -	-	-	$ -	$0.00
Total Development and Regulatory	$ 367,353	$ 570,000	-	-	-		$ -	$ -	-	-	-	$0.00
Total - All ECO	**$ 7,895,824**	**$ 10,064,451**	**50,321,324**	**50,999,311**	**637,699,897**	**649,383,322**	**$ 0.16**	**$0.20**	**28,545**	**79,709.69**	**$276.61**	**$126.26**

Appendix B – Third Party Evaluations

- **HER OTP Summary Report 2024**

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Otter Tail Home Energy Reports Program:
2024 Results Report

Section 1: Program Overview

In June 2011, Otter Tail Power Company (Otter Tail) and Opower launched the Home Energy Reports pilot, a behavioral program designed to boost customer engagement and reduce residential energy consumption. Initially, 30,000 households were selected for the program, and the vast majority received a series of personalized Home Energy Reports designed to motivate and educate recipients to take actions to improve the energy efficiency of their homes.

- Annually in 2012, 2013, and 2014, additional residential customers in Otter Tail's Minnesota service territory were added to the program as a refill to offset attrition (primarily from utility account turnover) and return the program to its original size. At the onset of the program a control group was put in place, and in August 2015, the control group was discontinued, and program design was expanded to reach as many eligible customers as possible.
    - Refill groups were measured utilizing the Modeled Savings Protocol approved by the Minnesota Department of Energy Resources (MN DER, formerly Office of Energy Security) in 2010. This method is discussed in more detail in Section 2.
    - An update to the Modeled Savings Protocol was submitted for approval to the MN DER with a request to apply the revised methodology to all waves of the program in 2016. The revised methodology is described in more detail in Section 2.
- In January 2017, the program size was reduced to 28,000 households. An additional 4,000 households were added to the program in August 2020, and 1,000 previously treated households from the June 2011 wave were re-added at the same time to maintain the 28,000-household program goal and to provide a level of over selection to plan for near term attrition.
- In January 2021, Otter Tail increased the number of households in the program to 33,000. 33,000 was the maximum number of homes that we can guarantee eligibility for given the territory size and high volume of annual account churn within the territory. As a result, we decided to move Otter Tail to "rolling enrollment."
    - Rolling enrollment is the process of automatically adding customers to the program as they become eligible. The key difference here is that all rolling enrollment customers are on one wave that is automatically refreshed with new eligible recipients as there is account turnover. In the past, customers were added manually all at once, which resulted in the many waves of customers.
    - Given we maxed out the number of households we can guarantee reaching through the program, moving to rolling enrollment was the best choice in order to maximize territory reach at any given moment.
- In May 2022, Otter Tail increased the number of households in the program by 1,300 specifically to provide Home Energy Reports to customers identified as Low to Moderate Income (LMI) customers. A

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new wave was created and launched for this purpose in July 2022, with the original wave size upon selection being 1,224. Additionally, in July 2022, Otter Tail and Opower identified 9,157 customers from among the *already existing* waves as LMI customers, using LIHEAP enrollment and approximate household income compared to state median income as LMI identifiers. For income, customers with less than or equal to $46,080 annual income were identified as LMI. For clarity, these 9,157 customers were A) separate from the 1,224 customers identified as LMI who were added to their own net new wave, and B) were not net new customers themselves but were instead part of already existing waves.

- In February 2024, Otter Tail increased the number of households in the program to 37,500, in order to reach 27,500 Standard Report recipients and 10,000 LMI customers. Additionally, since the Minnesota definition for LMI customers changed from 60% of state median income, to 80% of area median income, the process for classifying LMI customers was adjusted accordingly.

Figure 1a: 2024 Standard Report Recipients by Wave (households receiving at least 1 report in 2024)

Waves	Recipients	% of total wave population
June 2011 Wave	**7,759**	**76.8%**
October 2012 Wave	**895**	**75.9%**
July 2013 Wave	**730**	**75.3%**
July 2014 Wave	**534**	**72%**
August 2015 Wave	**2,283**	**76.3%**
July 2016 Wave	**773**	**75.6%**
October 2018 Wave (Consolidated_E Wave)	**1,703**	**75.4%**
August 2019 Wave	**1,262**	**70.5%**
August 2020 Wave	**1,468**	**71.7%**
January 2021 Wave (Rolling Enrollment Wave)	**12,047**	**77.1%**
July 2022 Wave	**406**	**60.1%**
2024 Total	**29,860**	

Figure 1b: 2024 LMI Report Recipients by Wave (households receiving at least 1 report in 2024)

Waves	Recipients	% of total wave population
June 2011 Wave	**2,343**	**23.2%**
October 2012 Wave	**284**	**24.1%**
July 2013 Wave	**239**	**24.7%**

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July 2014 Wave	**208**	**28.0%**
August 2015 Wave	**708**	**23.7%**
July 2016 Wave	**249**	**24.4%**
October 2018 Wave (Consolidated_E Wave)	**556**	**24.6%**
August 2019 Wave	**527**	**29.5%**
August 2020 Wave	**580**	**28.3%**
January 2021 Wave (Rolling Enrollment Wave)	**3,576**	**22.9%**
July 2022 Wave	**270**	**39.9%**
2024 Total	**9,540**	

Home Energy Reports, pictured in Figure 2, contain various personalized components designed to motivate and educate customers on energy efficiency actions. In July 2023, Otter Tail moved to using the latest version of Home Energy Report, HERv3. Report components include:

- Comparisons of recent energy use to a group of comparable 'similar homes'; this section includes both normative and injunctive messages designed to motivate action. HERv3 leverages the concept of an Efficiency Zone, instead of efficient neighbors, to create a positive energy use target for customers.
- Comparison of recent energy use to historical energy use, tracking household improvement over time.
- Targeted energy efficiency advice; specific tips are selected based on the home's energy use pattern, housing characteristics, and household demographics.
- Dynamic modules to promote programs and include seasonal information.

Figure 2: Example of Otter Tail Home Energy Report – Print (Front & Back)

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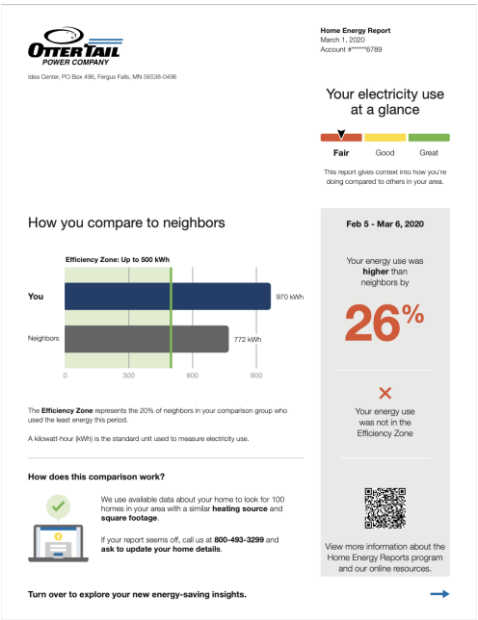

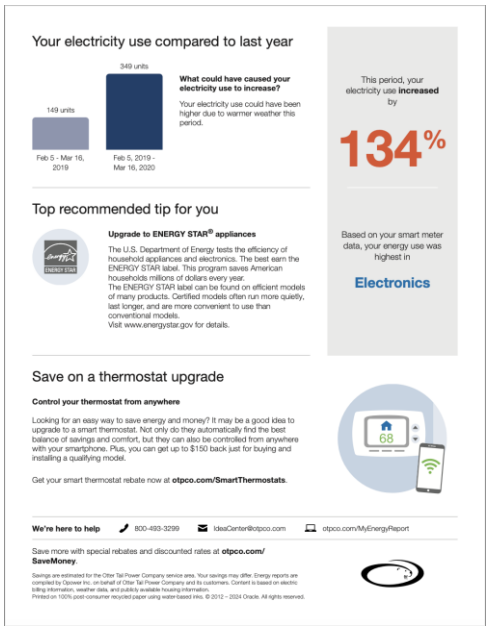

Beginning in mid-October 2022, Opower added email Home Energy Reports to the customer experience for existing HER customers who have a valid email address. Figure 3a, below, shows the count of standard customers who received at least one email report in 2024, broken out by deployment wave. Figure 3b, below, shows the count of LMI customers who received at least one email report in 2024, broken out by deployment wave. From January to December 2024, 163,373 email Home Energy Reports were dispatched to 22,008 unique customers. Similar to the print version of the Home Energy Reports, these reports were upgraded to the latest version, HERv3, and contain an Efficiency Zone comparison, a benchmark for customers' energy usage over time, and personalized energy-saving tips. Space is also provided for optional marketing modules, used to promote other utility initiatives prioritized by Otter Tail. Figure 3c contains pictures of a HERv3 email Home Energy Report. The addition of the email channel is expected to bolster energy savings as well as drive increased customer engagement in digital channels.

Figure 3a: 2024 Standard Email Report Recipients by Wave (households receiving at least 1 report in 2024)

Waves	Recipients
June 2011 Wave	**2,618**
October 2012 Wave	**363**
July 2013 Wave	**306**
July 2014 Wave	**225**
August 2015 Wave	**862**
July 2016 Wave	**395**

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October 2018 Wave (Consolidated_E Wave)	**954**
August 2019 Wave	**694**
August 2020 Wave	**922**
January 2021 Wave (Rolling Enrollment Wave)	**9,394**
July 2022 Wave	**258**
2024 Total	**16,991**

Figure 3b: 2024 LMI Email Report Recipients by Wave (households receiving at least 1 report in 2024)

Waves	Recipients
June 2011 Wave	**709**
October 2012 Wave	**110**
July 2013 Wave	**94**
July 2014 Wave	**86**
August 2015 Wave	**286**
July 2016 Wave	**132**
October 2018 Wave (Consolidated_E Wave)	**310**
August 2019 Wave	**265**
August 2020 Wave	**337**
January 2021 Wave (Rolling Enrollment Wave)	**2,544**
July 2022 Wave	**144**
2024 Total	**5,017**

Figure 3c: Example of Otter Tail Home Energy Report - Email

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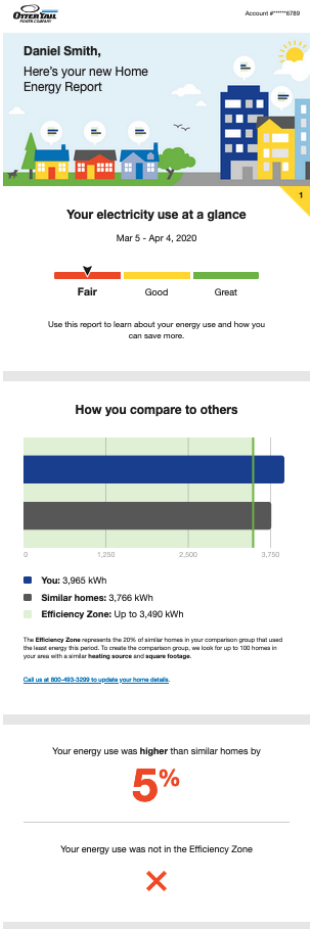

Cumulatively, 17 customers chose to opt out of the program in 2024, which corresponds to an opt-out rate of 0.043% for the year. The 2024 opt-out rate compares favorably to opt-out rates of between 1 and 3 percent at other Minnesota utilities and is lower than the Opower overall average. In the same timeframe, 3,653 participants closed their electric accounts with Otter Tail, effectively removing them from the program. Depending on when these events occurred, these customers may have received fewer than four print reports in 2024 but are included as participants.

Figure 4: 2024 Account Closures & Opt-Outs by Wave

Wave	Account Closures	Opt-Outs
June 2011 Wave	462	5
October 2012 Wave	56	1
July 2013 Wave	62	0
July 2014 Wave	28	0
August 2015 Wave	163	1

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July 2016 Wave	51	0
October 2018 Wave (Consolidated_E Wave)	122	1
August 2019 Wave	141	0
August 2020 Wave	161	1
January 2021 Wave (Rolling Enrollment Wave)	2,302	8
July 2022 Wave	105	1
2024 Total	**3,653**	**17**

Section 2: Savings Calculation Methodology

This section describes the criteria used to define the population eligible to receive Home Energy Reports, the methodology originally used to assign homes to treatment and control groups, the methodology for assigning homes to certain customer segments, and the measurement and verification techniques used to derive program savings.

Opower integrates data from a variety of sources to ensure the Home Energy Reports are personalized, accurate, and meaningful for all recipients. These data integration efforts also allow for detailed analysis of energy savings results that enable the optimization of feature design and targeting of specific energy efficiency messages. The data used for the various analyses presented herein were collected from three primary sources:

1. *Consumption data:* Otter Tail provides Opower with weekly updates of monthly consumption data for all households in the program, including historical consumption information.

2. *Parcel data:* Opower received, to the extent available from a third-party vendor, data about household parcels, including home size, age and value, heating and cooling type, as well as pool and hot tub data. These data elements are static with the exception of square footage, heating and cooling type, and pool and hot tub data, which may be updated at the customer's request.

3. *Demographic data:* Opower received, to the extent available from a third-party vendor, demographic data about participants, including household income, number of occupants, age of occupant(s), and an owner/renter indicator. These fields were used to recommend customized energy efficiency tips to customers by using relevant demographic targeting. Household size may be updated at the customer's request.

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From June 2011 (program launch) to August 2015, we measured impacts for the Home Energy Reports program via Randomized Control Trial (RCT). This involved taking our eligible population and splitting them into treatment and control groups that were statistically equivalent. We then sent Home Energy Reports to the treatment group, and we attributed any differences in usage between groups to the communications the treatment group received.

The initial analysis of the Home Energy Reports program relied upon a fixed-effects regression model. The rationale for using a regression model to interpret the results of the 2011 wave are threefold: 1) the model eliminates variability due to other factors and allows for tighter error bars around the estimate of report impact; 2) in order to isolate the impact of the Home Energy Reports on energy use, it is appropriate to control for slight differences in the housing and demographic characteristics present in the treatment and control population; and 3) the model makes the search for population segments with better or worse than average impact much more manageable. This statistical methodology is standard procedure for the analysis of controlled experiments and is a well-accepted practice within the energy efficiency program measurement and verification community. This was the statistical methodology used to measure results for the initial wave of 30,000 households.

Once we had measured results for about 4 years, we expanded the program to territory-wide deployment in August 2015. This meant we started treating control customers and switched our savings measurement to a *Modeled Savings Methodology* (see Sections 2.2 and 2.3).

2.1 RCT Disbanded

In August 2015, we started sending reports to the control group associated with the 2011 pilot wave, making it no longer possible to measure savings via RCT. Therefore, Opower began reporting all savings for the program under the Modeled Savings Protocol. The Modeled Savings Protocol states that:

> "Larger utilities in Minnesota (greater than 15,000 customers) could also have the option of deploying the Opower platform to the entire service territory. Should this case arise, Opower proposes that this protocol also be extended to larger utilities that have a minimum of two years of experimental data from a program administered by Opower. In this case, the model should be based only on results for that particular client, not a sampling of clients across the state."

Otter Tail's Opower program had over four years of measured savings, meeting the approved threshold. Therefore, consistent with the recommendations of the Modeled Savings Protocol, Opower relied on Otter Tail's own results to inform the model for calculating savings going forward.

2.2 Regression Model & Modeled Savings Methodology

The initial regression model of program results included regressors for heating and cooling degree days, baseline usage, home square footage, age of the home, and a treatment variable interacted with an indicator of whether

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the billing period is pre-treatment or post-treatment. Opower then scored the model based on the coefficients for treatment times post-deployment, baseline usage, home square footage, and age of the home.

Output was a function that describes energy savings as a function of observable household or customer characteristics. The form of the model was determined based on the statistical significance of the candidate variables. A simplified equation using square footage and age of the customer's home, the number of occupants, the baseline usage in the pre-treatment period, and an indicator of whether the customer owns or rents their home is given below:

$$Savings = b0 + b1(sqft) + b2(age) + b3(\#\ of\ occupants) + b4(baseline\ usage) + b5(owner)$$

Model output was the result of a similar equation, depending on the statistically significant variables.

The average of the 'scored' savings was the predicted per household savings for each customer in the utility. Multiplying this score by the number of customers yielded the total savings over the time period in question.

Opower recognizes that because this methodology does not employ experimental design, it may be prudent to adjust the savings percentage accordingly. The resolved solution is to cap the savings calculated through this protocol at the maximum measured savings across the experimentally designed programs in Minnesota.

This methodology for measuring savings in territory-wide deployments, has also been used successfully at various utilities in Minnesota, Colorado, California, and Washington.

2.3 Update to the *Modeled Savings Methodology*

In 2016, updates were made to the Modeled Savings Methodology to improve the accuracy of the reporting. These changes include:

- Establishing the relationship between the monthly savings rate and the cumulative number of print reports received per person in the wave up to that month.
- Applying the forecasted savings rate in a given month to the usage of the modeled wave.
- Adapting the algorithm to apply to rolling enrollment waves.

To refine Opower's Modeled Savings Methodology, 19 RCT waves at municipal utilities, co-operatives, and small investor-owned utilities, were used to measured the relationship between monthly savings rate and print reports received to date. This yields the following equation:

electric_savings_rate *= (0.0056819 * log_cumulative_report_per_person_lag + 0.0111886) * (1 + 0.3 * emails_per_person_lag)*

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Where *log_cumulative_report_per_person_lag* is the log of the cumulative paper reports per person lagged by one month, and the *emails_per_person_lag* is the number of emails per person lagged by one month.

The savings can be calculated from the total usage and estimated savings rate:

savings = savings_rate * treatment_usage / (1 - savings_rate)

Where treatment_usage is the usage of the full, active treatment population.

Otter Tail received approval from the MN DER on October 7, 2016, to apply a revised Modeled Savings Methodology to calculate energy savings.

Section 3: 2024 Program Energy Savings

We estimate the gross total savings for all residential program participants in 2024 amounted to 13,203.86 MWh, and participants saved at a rate of 2.84 percent on average. A month-by-month breakdown of savings for market rate customers is shown below in Figure 5b, and a month-by-month breakdown of savings for LMI customers is shown below in Figure 5c.

Previously, we estimated the savings attributable to low-income versus market rate households by calculating the percentage of the number of low-income (LMI) households relative to the number of market rate participants (as shown in Figures 1a and 1b above) and applying that percentage to the overall savings calculated for the program. In 2023, we updated the methodology to estimate savings based on usage, rather than household counts, to be more reflective of the actual savings for these two groups. This approach involves analyzing the total usage by wave and customers type (LMI versus MR) in a given year and allocating the savings based on the percent usage for LMI and MR customers.

We will update the percent allocation each February (once sufficient usage for December of the previous year is received) to be reflective of the actual usage of LMI versus MR customers in each wave for the previous year.

Figure 5a: 2024 Usage Breakdown

Wave	MR MWh Usage (% of total usage)	LI MWh Usage (% of total usage)
June 2011 Wave	109,127 (81.5%)	24,707 (18.5%)
October 2012 Wave	15,893 (80%)	3,967 (20%)
July 2013 Wave	11,835 (77.9%)	3,360 (22.1%)
July 2014 Wave	9,373 (76.7%)	2,842 (23.3%)
August 2015 Wave	33,307 (79%)	8,848 (21%)
July 2016 Wave	13,575 (79.4%)	3,511 (20.6%)

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October 2018 Wave (Consolidated_E Wave)	28,870 (77.5%)	8,378 (22.5%)
August 2019 Wave	16,568 (73.8%)	5,896 (26.2%)
August 2020 Wave	24,789 (75.6%)	8,020 (24.4%)
January 2021 Wave (Rolling Enrollment Wave)	112,997 (74.5%)	38,668 (25.5%)
July 2022 Wave	1,467 (62.5%)	882 (37.5%)
Total	**377,800 (77.6%)**	**109,078 (22.4%)**

Figure 5b: 2024 Standard Monthly Electric Savings Impact

Month	2024 Savings (MWh)
Jan-2024	1,106
Feb-2024	960
Mar-2024	1,000
Apr-2024	838
May-2024	666
Jun-2024	666
Jul-2024	823
Aug-2024	883
Sep-2024	720
Oct-2024	648
Nov-2024	850
Dec-2024	1,156
Total	**10,315***

* Please note that the total does not add up exactly due to rounded numbers being shown in this table

Figure 5c: 2024 LMI Monthly Electric Savings Impact

Month	2024 Savings (MWh)
Jan-2024	307
Feb-2024	266
Mar-2024	279

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Apr-2024	234
May-2024	186
Jun-2024	187
Jul-2024	232
Aug-2024	248
Sep-2024	203
Oct-2024	182
Nov-2024	239
Dec-2024	325
Total	**2,889***

* Please note that the total does not add up exactly due to rounded numbers being shown in this table

Opower Home Energy Report programs increase customer participation in other utility energy efficiency programs. The evidence for this comes from Opower's RCTs. Treatment customers who receive reports participate in utility energy efficiency programs at higher rates than do control customers. The most recent Opower meta-analyses of the impact on program participation show a 15 percent lift across all utility energy efficiency programs. The increase in participation impacts savings for the reports program in the form of jointly attributable savings. Opower will remove these jointly attributable savings, to avoid the risk of 'double-counting'.

With a control group no longer available for program participation measurement, Opower has applied a value measured by Xcel Energy in its Minnesota program evaluation, entitled *Verification of Savings from Xcel Energy Minnesota's Print Energy Feedback Pilot Project* from March 2014, performed by the Center for Energy and Environment. The value is an average of the jointly attributable percentage savings from 2010-2012, which equates to 1.4 percent of program annual savings. Gross savings in 2024 will be reduced by 184.9 MWh to account for these jointly attributable savings. Net annual savings for the program in 2024 is therefore adjusted to 13,019.01 MWh, which is equal to an average of 330.43 kilowatt-hours in energy savings per participant household.

**Note that the October 2018 Wave is also referred to as "Consolidated_E wave" in some reports so those two names are interchangeable. **

Appendix C –
Project Information Sheets

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Appliance					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$101,000	$93,791	$101,000		$101,000	
Administration	$6,000	$4,009	$6,000		$6,000	
Evaluation, Measurement & Verification	$1,000	$203	$1,000		$1,000	
Advertising & Promotion	$35,000	$18,744	$35,000		$35,000	
Incentives	$40,000	$53,855	$40,000		$40,000	
Other	$0	$0	$0		$0	
Total Utility Costs	$183,000	$170,601	$183,000		$183,000	
Total Participants	829	1,118	829		829	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	371,535	285,618	371,535		371,535	
Annual kWh Savings at Generator	414,428	315,180	414,428		414,428	
Cost per Annual kWh Saved at Generator	$0.44	$0.54	$0.44		$0.44	
Lifetime Savings	3,249,466	2,755,969	3,249,466		3,249,466	
Peak kW Savings at Meter	51.07	36.81	51.07		51.07	
Peak kW Savings at Generator	56.97	40.61	56.97		56.97	
Cost per Peak kW Saved at Generator	$3,212	$4,201	$3,212		$3,212	
MN Ratio	1.23	1.08				
MN NPV	$44,667	$13,774				
Utility Ratio	0.68	0.61	0.70		0.71	
Utility NPV	($62,332)	($66,518)	($60,315)		($57,767)	
Ratepayer Ratio	0.29	0.26	0.29		0.29	
Ratepayer NPV	($339,171)	($302,214)	($342,691)		($345,791)	
Participant Ratio	7.01	5.78	7.13		7.26	
Participant NPV	$293,261	$257,011	$299,303		$305,465	
Societal Ratio	1.17	1.13	1.20		1.23	
Societal NPV	$35,858	$22,533	$41,403		$47,490	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Direct Install					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$32,000	$147,377	$32,000		$32,000	
Administration	$6,000	$2,716	$6,000		$6,000	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$2,000	$0	$2,000		$2,000	
Incentives	$96,000	$870	$99,000		$99,000	
Other	$0	$0	$0		$0	
Total Utility Costs	$137,000	$150,963	$140,000		$140,000	
Total Participants	16,850	16,831	19,850		19,850	
Financial Incentive		59,374				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	1,417,103	1,258,762	1,503,116		1,503,116	
Annual kWh Savings at Generator	1,580,706	1,389,044	1,676,649		1,676,649	
Cost per Annual kWh Saved at Generator	$0.09	$0.11	$0.08		$0.08	
Lifetime Savings	19,390,534	18,978,244	19,374,149		19,374,149	
Peak kW Savings at Meter	124.07	110.00	124.07		124.07	
Peak kW Savings at Generator	138.39	121.37	138.39		138.39	
Cost per Peak kW Saved at Generator	$990	$1,244	$1,012		$1,012	
MN Ratio	5.55	5.80				
MN NPV	$1,021,014	$1,009,071				
Utility Ratio	2.72	3.97	2.74		2.75	
Utility NPV	$386,737	$447,780	$405,277		$419,657	
Ratepayer Ratio	0.35	0.37	0.35		0.36	
Ratepayer NPV	($1,123,107)	($1,030,715)	($1,178,367)		($1,195,659)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$1,837,037	$1,823,428	$1,921,841		$1,958,297	
Societal Ratio	9.65	38.24	9.81		9.65	
Societal NPV	$1,117,014	$1,187,523	$1,175,901		$1,212,704	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Energy Feedback Program					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$295,000	$11,786	$295,000		$295,000	
Administration	$2,000	$11,721	$2,000		$2,000	
Evaluation, Measurement & Verification	$28,000	$640	$28,000		$28,000	
Advertising & Promotion	$15,000	$0	$15,000		$15,000	
Incentives	$0	$196,241	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$340,000	$220,387	$340,000		$340,000	
Total Participants	33,500	29,860	33,500		33,500	
Financial Incentive		11,494				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	0%	0%	0%		0%	
Budget % (% of Total Utility Costs)	0%	0%	0%		0%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	1,251,706	3,329,390	1,251,706		1,251,706	
Annual kWh Savings at Generator	1,396,214	3,673,982	1,396,214		1,396,214	
Cost per Annual kWh Saved at Generator	$0.24	$0.06	$0.24		$0.24	
Lifetime Savings	3,755,119	3,673,982	3,755,119		3,755,119	
Peak kW Savings at Meter	4,751.67	1,383.40	4,751.67		4,751.67	
Peak kW Savings at Generator	5,300.25	1,526.37	5,300.25		5,300.25	
Cost per Peak kW Saved at Generator	$64	$144	$64		$64	
MN Ratio	2.34	3.80				
MN NPV	$473,259	$648,961				
Utility Ratio	2.00	2.47	2.03		2.10	
Utility NPV	$358,428	$323,405	$366,702		$396,035	
Ratepayer Ratio	0.99	0.42	0.99		1.02	
Ratepayer NPV	($9,249)	($755,791)	($8,328)		$13,504	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$367,676	$1,079,196	$375,030		$382,531	
Societal Ratio	2.33	4.00	2.36		2.45	
Societal NPV	$473,259	$660,455	$485,464		$518,793	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Energy Management					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$42,000	$30,539	$42,000		$42,000	
Administration	$2,500	$496	$2,500		$2,500	
Evaluation, Measurement & Verification	$1,500	$0	$1,500		$1,500	
Advertising & Promotion	$50,000	$47,699	$50,000		$50,000	
Incentives	$16,000	$8,925	$16,000		$16,000	
Other	$4,000	$0	$4,000		$4,000	
Total Utility Costs	$116,000	$87,658	$116,000		$116,000	
Total Participants	18,887	18,691	18,986		19,075	
Financial Incentive		1,263				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	406,181	365,787	409,077		411,797	
Annual kWh Savings at Generator	453,075	403,646	456,305		459,338	
Cost per Annual kWh Saved at Generator	$0.26	$0.22	$0.25		$0.25	
Lifetime Savings	406,181	403,646	409,077		411,797	
Peak kW Savings at Meter	5,955.31	9,234.21	6,001.85		6,042.51	
Peak kW Savings at Generator	6,642.84	10,188.57	6,694.76		6,740.11	
Cost per Peak kW Saved at Generator	$17	$9	$17		$17	
MN Ratio	6.92	14.65				
MN NPV	$697,597	$1,213,343				
Utility Ratio	6.81	14.72	7.15		7.50	
Utility NPV	$685,176	$1,202,262	$724,666		$767,678	
Ratepayer Ratio	5.04	10.01	5.25		5.48	
Ratepayer NPV	$643,764	$1,161,069	$682,110		$723,966	
Participant Ratio	0.96	0.53	0.98		1.00	
Participant NPV	($2,587)	($44,509)	($1,443)		($288)	
Societal Ratio	5.04	7.51	5.28		5.55	
Societal NPV	$653,597	$1,128,903	$693,604		$737,140	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Heating & Cooling					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$140,000	$114,945	$140,000		$140,000	
Administration	$31,000	$71,223	$31,000		$31,000	
Evaluation, Measurement & Verification	$5,000	$0	$5,000		$5,000	
Advertising & Promotion	$100,000	$102,624	$100,000		$100,000	
Incentives	$605,100	$872,727	$605,100		$605,100	
Other	$34,500	$4,998	$34,500		$34,500	
Total Utility Costs	$915,600	$1,166,518	$915,600		$915,600	
Total Participants	1,176	1,013	1,176		1,176	
Financial Incentive		336,225				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	3,726,936	5,413,564	3,726,936		3,726,936	
Annual kWh Savings at Generator	4,157,207	5,973,867	4,157,207		4,157,207	
Cost per Annual kWh Saved at Generator	$0.22	$0.20	$0.22		$0.22	
Lifetime Savings	67,582,721	107,470,491	67,582,721		67,582,721	
Peak kW Savings at Meter	404.45	593.70	404.45		404.45	
Peak kW Savings at Generator	451.14	655.05	451.14		451.14	
Cost per Peak kW Saved at Generator	$2,030	$1,781	$2,030		$2,030	
MN Ratio	3.76	4.65				
MN NPV	$3,402,929	$5,483,020				
Utility Ratio	1.91	2.92	1.95		1.99	
Utility NPV	$1,110,804	$2,243,685	$1,167,698		$1,233,977	
Ratepayer Ratio	0.35	0.38	0.36		0.36	
Ratepayer NPV	($4,340,266)	($5,518,823)	($4,329,512)		($4,373,683)	
Participant Ratio	2.13	1.91	2.14		2.18	
Participant NPV	$3,767,562	$4,834,072	$3,819,438		$3,951,159	
Societal Ratio	1.17	1.25	1.20		1.24	
Societal NPV	$664,123	$1,406,997	$798,685		$945,250	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Lighting					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$115,000	$102,896	$115,000		$115,000	
Administration	$9,000	$8,187	$9,000		$9,000	
Evaluation, Measurement & Verification	$1,000	$36	$1,000		$1,000	
Advertising & Promotion	$30,000	$33,959	$30,000		$30,000	
Incentives	$501,000	$366,777	$505,000		$505,000	
Other	$1,000	$0	$1,000		$1,000	
Total Utility Costs	$657,000	$511,854	$661,000		$661,000	
Total Participants	187,765	127,780	189,165		189,165	
Financial Incentive		146,805				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	3,318,001	2,441,490	3,358,141		3,358,141	
Annual kWh Savings at Generator	3,701,061	2,694,184	3,745,834		3,745,834	
Cost per Annual kWh Saved at Generator	$0.18	$0.19	$0.18		$0.18	
Lifetime Savings	53,621,169	46,924,400	52,638,122		52,638,122	
Peak kW Savings at Meter	246.58	185.67	246.58		246.58	
Peak kW Savings at Generator	275.04	204.86	275.04		275.04	
Cost per Peak kW Saved at Generator	$2,389	$2,499	$2,403		$2,403	
MN Ratio	3.69	4.37				
MN NPV	$2,401,650	$2,222,566				
Utility Ratio	1.73	2.64	1.77		1.79	
Utility NPV	$659,264	$840,072	$698,628		$735,957	
Ratepayer Ratio	0.32	0.34	0.32		0.32	
Ratepayer NPV	($3,393,053)	($2,650,365)	($3,455,084)		($3,500,828)	
Participant Ratio	3.14	2.17	3.21		3.27	
Participant NPV	$3,587,256	$2,430,471	$3,708,399		$3,805,959	
Societal Ratio	1.59	1.30	1.64		1.68	
Societal NPV	$1,228,017	$658,997	$1,339,123		$1,436,194	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Residential Energy Code Compliance					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$22,000	$17,532	$22,000		$22,000	
Administration	$5,000	$236	$5,000		$5,000	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$2,000	$0	$2,000		$2,000	
Incentives	$0	$0	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$30,000	$17,768	$30,000		$30,000	
Total Participants	0	0	0		1	
Financial Incentive		0				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	0	0	0		477,816	
Annual kWh Savings at Generator	0	0	0		532,979	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.06	
Lifetime Savings	-	-	-		477,815	
Peak kW Savings at Meter	0.00	0.00	0.00		54.54	
Peak kW Savings at Generator	0.00	0.00	0.00		60.84	
Cost per Peak kW Saved at Generator	$0	$0	$0		$493	
MN Ratio		0.00				
MN NPV	($30,000)	($17,768)				
Utility Ratio	0.00	0.00	0.00		0.65	
Utility NPV	($30,000)	($17,768)	($30,000)		($11,402)	
Ratepayer Ratio	0.00	0.00	0.00		0.26	
Ratepayer NPV	($30,000)	($17,768)	($30,000)		($60,077)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$48,675	
Societal Ratio	0.00	0.00	0.00		1.13	
Societal NPV	($30,000)	($17,768)	($30,000)		$4,218	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Residential Advertising and Education					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$193,000	$16,893	$193,000		$193,000	
Administration	$0	$19,748	$0		$0	
Evaluation, Measurement & Verification	$500	($68)	$500		$325	
Advertising & Promotion	$0	$129,716	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$0	$9	$0		$0	
Total Utility Costs	$193,500	$166,297	$193,500		$193,325	
Total Participants	15,000	114,125	15,000		15,000	
Financial Incentive		0				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-	-	-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($193,500)	($166,297)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($193,500)	($166,297)	($193,500)		($193,325)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($193,500)	($166,297)	($193,500)		($193,325)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($193,500)	($166,297)	($193,500)		($193,325)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Residential Implementation and Training					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$32,000	$121,970	$32,000		$32,000	
Administration	$1,000	$3,358	$1,000		$1,000	
Evaluation, Measurement & Verification	$2,000	$942	$2,000		$2,000	
Advertising & Promotion	$1,000	$608	$1,000		$1,000	
Incentives	$0	$4,382	$0		$0	
Other	$2,000	$1,230	$2,000		$2,000	
Total Utility Costs	$38,000	$132,491	$38,000		$38,000	
Total Participants	175	51	175		175	
Financial Incentive		0				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	24%	24%	24%		24%	
Budget % (% of Total Utility Costs)	24%	24%	24%		24%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-	-	-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($38,000)	($132,491)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($38,000)	($132,491)	($38,000)		($38,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($38,000)	($132,491)	($38,000)		($38,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$4,382	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($38,000)	($128,109)	($38,000)		($38,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Low-Income House Therapy					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$50,000	$246,561	$50,000		$50,000	
Administration	$8,000	$4,354	$8,000		$8,000	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$5,000	$1,947	$5,000		$5,000	
Incentives	$247,000	$2,223	$247,000		$247,000	
Other	$5,000	$0	$5,000		$5,000	
Total Utility Costs	$317,000	$255,085	$317,000		$317,000	
Total Participants	180	798	180		180	
Financial Incentive		5,569				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	100%	100%	100%		100%	
Budget % (% of Total Utility Costs)	100%	100%	100%		100%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	227,947	97,075	227,947		227,947	
Annual kWh Savings at Generator	254,264	107,122	254,264		254,264	
Cost per Annual kWh Saved at Generator	$1.25	$2.38	$1.25		$1.25	
Lifetime Savings	3,762,195	1,780,063	3,762,195		3,762,195	
Peak kW Savings at Meter	28.54	5.38	28.54		28.54	
Peak kW Savings at Generator	31.83	5.94	31.83		31.83	
Cost per Peak kW Saved at Generator	$9,958	$42,933	$9,958		$9,958	
MN Ratio	0.73	0.39				
MN NPV	($87,791)	($159,918)				
Utility Ratio	0.36	0.17	0.37		0.39	
Utility NPV	($212,299)	($210,886)	($208,958)		($205,732)	
Ratepayer Ratio	0.20	0.11	0.20		0.21	
Ratepayer NPV	($494,329)	($344,466)	($496,629)		($499,156)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$529,030	$353,821	$534,671		$540,424	
Societal Ratio	2.83	2.89	2.91		2.97	
Societal NPV	$159,209	$65,881	$166,893		$174,460	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Low-Income Home Energy Feedback					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$82,500	$71,998	$82,500		$82,500	
Administration	$2,000	$618	$2,000		$2,000	
Evaluation, Measurement & Verification	$500	$0	$500		$500	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$85,000	$72,617	$85,000		$85,000	
Total Participants	180	9,540	10,000		10,000	
Financial Incentive		3,672				
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)	100%	100%	100%		100%	
Budget % (% of Total Utility Costs)	100%	100%	100%		100%	
Renter Participation*						
Participants % (% of Total Participants)	28%	28%	28%		28%	
Budget % (% of Total Utility Costs)	28%	28%	28%		28%	
Energy Savings						
Annual kWh Savings at Meter	1,209,252	1,063,710	403,084		403,084	
Annual kWh Savings at Generator	1,348,859	1,173,804	449,620		449,620	
Cost per Annual kWh Saved at Generator	$0.06	$0.06	$0.19		$0.19	
Lifetime Savings	1,209,252	1,173,804	1,209,252		1,209,252	
Peak kW Savings at Meter	1,280.06	441.98	1,280.06		1,280.06	
Peak kW Savings at Generator	1,427.84	487.66	1,427.84		1,427.84	
Cost per Peak kW Saved at Generator	$60	$149	$60		$60	
MN Ratio	2.63	3.69				
MN NPV	$145,553	$205,132				
Utility Ratio	2.20	2.39	2.21		2.30	
Utility NPV	$108,574	$101,120	$109,875		$117,896	
Ratepayer Ratio	0.95	0.42	0.95		0.98	
Ratepayer NPV	($9,828)	($243,673)	($10,895)		($5,289)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$118,402	$344,793	$120,770		$123,185	
Societal Ratio	2.61	3.88	2.64		2.73	
Societal NPV	$145,553	$208,805	$148,120		$157,428	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Audits & Studies					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$155,000	$95,554	$155,000		$155,000	
Administration	$10,000	$6,517	$10,000		$10,000	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$5,000	$3,035	$5,000		$5,000	
Incentives	$142,000	$38,600	$142,000		$142,000	
Other	$5,000	$0	$5,000		$5,000	
Total Utility Costs	$319,000	$143,706	$319,000		$319,000	
Total Participants	86	107	86		86	
Financial Incentive		15,162				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	10%	10%	10%		10%	
Industrial	90%	90%	90%		90%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	2,727,190	622,567	2,727,190		2,727,190	
Annual kWh Savings at Generator	3,042,041	687,003	3,042,041		3,042,041	
Cost per Annual kWh Saved at Generator	$0.10	$0.21	$0.10		$0.10	
Lifetime Savings	17,534,394	4,846,262	17,534,394		17,534,394	
Peak kW Savings at Meter	333.26	274.52	333.26		333.26	
Peak kW Savings at Generator	371.73	302.89	371.73		371.73	
Cost per Peak kW Saved at Generator	$858	$474	$858		$858	
MN Ratio	3.04	3.27				
MN NPV	$804,496	$360,395				
Utility Ratio	1.62	2.46	1.63		1.64	
Utility NPV	$248,065	$209,927	$250,708		$258,318	
Ratepayer Ratio	0.45	0.67	0.45		0.45	
Ratepayer NPV	($776,863)	($176,808)	($794,718)		($808,017)	
Participant Ratio	7.77	2.58	7.91		8.04	
Participant NPV	$1,016,728	$262,579	$1,037,226		$1,058,135	
Societal Ratio	2.96	1.94	3.00		3.04	
Societal NPV	$796,296	$251,401	$816,943		$842,557	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Direct Install					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$35,000	$25,771	$35,000		$35,000	
Administration	$5,000	$1,137	$5,000		$5,000	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$2,000	$0	$2,000		$2,000	
Incentives	$23,000	$4,016	$23,000		$23,000	
Other	$1,000	$0	$1,000		$1,000	
Total Utility Costs	$67,000	$30,924	$67,000		$67,000	
Total Participants	2,465	702	2,465		2,465	
Financial Incentive		1,010				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	100%	10%	100%		100%	
Industrial	0%	90%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	171,905	40,637	171,905		171,905	
Annual kWh Savings at Generator	191,751	44,843	191,751		191,751	
Cost per Annual kWh Saved at Generator	$0.35	$0.69	$0.35		$0.35	
Lifetime Savings	1,648,440	322,854	1,612,775		1,612,775	
Peak kW Savings at Meter	23.05	5.06	23.05		23.05	
Peak kW Savings at Generator	25.71	5.58	25.71		25.71	
Cost per Peak kW Saved at Generator	$2,606	$5,540	$2,606		$2,606	
MN Ratio	1.59	0.68				
MN NPV	$37,946	($10,066)				
Utility Ratio	0.80	0.37	0.81		0.83	
Utility NPV	($15,441)	($19,397)	($14,541)		($13,372)	
Ratepayer Ratio	0.13	0.21	0.13		0.13	
Ratepayer NPV	($408,635)	($44,008)	($415,599)		($422,451)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$417,244	$28,627	$425,108		$433,129	
Societal Ratio	2.19	0.81	2.24		2.28	
Societal NPV	$61,996	($5,039)	$64,678		$67,629	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Energy Management					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$8,350	$646	$8,350		$8,350	
Administration	$9,650	$0	$9,650		$9,650	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$5,000	$3,886	$5,000		$5,000	
Incentives	$0	$0	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$24,000	$4,533	$24,000		$24,000	
Total Participants	512	334	512		512	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	100%	10%	100%		100%	
Industrial	0%	90%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	11,119	6,555	11,119		11,119	
Annual kWh Savings at Generator	12,403	7,234	12,403		12,403	
Cost per Annual kWh Saved at Generator	$1.94	$0.63	$1.94		$1.94	
Lifetime Savings	11,119	7,234	11,119		11,119	
Peak kW Savings at Meter	347.16	69.04	347.16		347.16	
Peak kW Savings at Generator	387.24	76.18	387.24		387.24	
Cost per Peak kW Saved at Generator	$62	$59	$62		$62	
MN Ratio	1.84	2.20				
MN NPV	$20,181	$5,466				
Utility Ratio	1.82	2.16	1.90		1.98	
Utility NPV	$19,841	$5,267	$21,676		$23,662	
Ratepayer Ratio	1.49	1.60	1.55		1.61	
Ratepayer NPV	$14,503	$3,683	$16,232		$18,109	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$5,337	$1,584	$5,444		$5,553	
Societal Ratio	1.84	2.21	1.92		2.00	
Societal NPV	$20,181	$5,488	$22,028		$24,025	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Heat Pumps					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$115,000	$98,227	$115,000		$115,000	
Administration	$6,000	$2,540	$6,000		$6,000	
Evaluation, Measurement & Verification	$5,000	$65	$5,000		$5,000	
Advertising & Promotion	$5,000	$4,888	$5,000		$5,000	
Incentives	$539,400	$408,375	$539,400		$539,400	
Other	$5,000	$5,983	$5,000		$5,000	
Total Utility Costs	$675,400	$520,078	$675,400		$675,400	
Total Participants	311	227	311		311	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	3,328,671	2,252,887	3,328,671		3,328,671	
Annual kWh Savings at Generator	3,712,962	2,486,061	3,712,962		3,712,962	
Cost per Annual kWh Saved at Generator	$0.18	$0.21	$0.18		$0.18	
Lifetime Savings	62,104,844	38,881,131	61,600,162		61,600,162	
Peak kW Savings at Meter	360.40	279.85	360.40		360.40	
Peak kW Savings at Generator	402.01	308.77	402.01		402.01	
Cost per Peak kW Saved at Generator	$1,680	$1,684	$1,680		$1,680	
MN Ratio	4.49	4.06				
MN NPV	$3,370,347	$1,965,197				
Utility Ratio	2.30	2.53	2.49		2.53	
Utility NPV	$1,242,802	$796,791	$1,433,316		$1,500,902	
Ratepayer Ratio	0.44	0.42	0.47		0.48	
Ratepayer NPV	($2,799,391)	($1,839,698)	($2,706,643)		($2,721,856)	
Participant Ratio	1.60	1.58	1.63		1.66	
Participant NPV	$1,716,661	$1,116,995	$1,814,428		$1,897,227	
Societal Ratio	1.32	1.28	1.41		1.45	
Societal NPV	$1,044,815	$567,344	$1,340,159		$1,482,134	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial & Industrial Focused Efficiency					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$160,000	$64,664	$160,000		$160,000	
Administration	$15,000	$9,418	$15,000		$15,000	
Evaluation, Measurement & Verification	$4,000	$0	$4,000		$4,000	
Advertising & Promotion	$5,000	$1,056	$5,000		$5,000	
Incentives	$468,000	$398,818	$468,000		$468,000	
Other	$5,000	$0	$5,000		$5,000	
Total Utility Costs	$657,000	$473,955	$657,000		$657,000	
Total Participants	26	18	26		26	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	10%	10%	10%		10%	
Industrial	90%	90%	90%		90%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	2,478,461	2,113,138	2,478,461		2,478,461	
Annual kWh Savings at Generator	2,764,597	2,331,848	2,764,597		2,764,597	
Cost per Annual kWh Saved at Generator	$0.24	$0.20	$0.24		$0.24	
Lifetime Savings	27,874,410	25,787,988	27,874,410		27,874,410	
Peak kW Savings at Meter	1,096.86	471.98	1,096.86		1,096.86	
Peak kW Savings at Generator	1,223.49	520.76	1,223.49		1,223.49	
Cost per Peak kW Saved at Generator	$537	$910	$537		$537	
MN Ratio	3.62	3.65				
MN NPV	$2,131,077	$1,467,966				
Utility Ratio	2.43	4.68	2.50		2.54	
Utility NPV	$1,120,279	$685,591	$1,177,995		$1,225,022	
Ratepayer Ratio	0.62	0.57	0.63		0.64	
Ratepayer NPV	($1,162,285)	($889,436)	($1,150,220)		($1,149,757)	
Participant Ratio	0.84	1.78	0.86		0.87	
Participant NPV	($519,436)	$863,509	($473,785)		($427,221)	
Societal Ratio	0.81	1.71	0.84		0.86	
Societal NPV	($670,923)	$837,126	($578,796)		($498,618)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Lighting					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$266,000	$146,314	$266,000		$266,000	
Administration	$15,000	$12,902	$15,000		$15,000	
Evaluation, Measurement & Verification	$2,000	$1,087	$2,000		$2,000	
Advertising & Promotion	$15,000	$2,697	$15,000		$15,000	
Incentives	$1,228,000	$818,325	$1,228,000		$1,228,000	
Other	$20,000	$0	$20,000		$20,000	
Total Utility Costs	$1,546,000	$981,325	$1,546,000		$1,546,000	
Total Participants	1,015	781	1,015		1,015	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	70%	10%	70%		70%	
Industrial	30%	90%	30%		30%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	11,769,620	10,347,102	11,769,620		11,769,620	
Annual kWh Savings at Generator	13,128,410	11,418,027	13,128,410		13,128,410	
Cost per Annual kWh Saved at Generator	$0.12	$0.09	$0.12		$0.12	
Lifetime Savings	121,468,901	121,045,915	104,426,565		104,426,565	
Peak kW Savings at Meter	2,044.30	1,592.00	2,044.30		2,044.30	
Peak kW Savings at Generator	2,280.32	1,756.54	2,280.32		2,280.32	
Cost per Peak kW Saved at Generator	$678	$559	$678		$678	
MN Ratio	4.19	6.28				
MN NPV	$6,715,610	$7,178,364				
Utility Ratio	2.30	4.68	2.35		2.37	
Utility NPV	$2,736,253	$3,607,657	$2,835,168		$2,929,965	
Ratepayer Ratio	0.50	0.55	0.50		0.54	
Ratepayer NPV	($4,841,344)	($3,827,519)	($4,893,981)		($4,397,103)	
Participant Ratio	1.78	1.69	1.82		1.73	
Participant NPV	$3,871,129	$3,370,172	$4,022,681		$3,620,600	
Societal Ratio	1.52	1.69	1.56		1.59	
Societal NPV	$3,009,142	$3,492,057	$3,240,911		$3,466,889	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Compressed Air Efficiency					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$10,000	$1,950	$10,000		$10,000	
Administration	$4,000	$1,631	$4,000		$4,000	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$2,000	$1,359	$2,000		$2,000	
Incentives	$51,000	$13,582	$51,000		$51,000	
Other	$2,000	$0	$2,000		$2,000	
Total Utility Costs	$71,000	$18,522	$71,000		$71,000	
Total Participants	16	10	16		16	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	50%	10%	50%		50%	
Industrial	50%	90%	50%		50%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	726,912	102,896	726,912		726,912	
Annual kWh Savings at Generator	810,833	113,546	810,833		810,833	
Cost per Annual kWh Saved at Generator	$0.09	$0.16	$0.09		$0.09	
Lifetime Savings	11,817,392	2,097,705	11,817,392		11,817,392	
Peak kW Savings at Meter	56.91	34.09	56.91		56.91	
Peak kW Savings at Generator	63.47	37.62	63.47		63.47	
Cost per Peak kW Saved at Generator	$1,119	$492	$1,119		$1,119	
MN Ratio	5.77	7.43				
MN NPV	$593,440	$161,264				
Utility Ratio	2.68	5.83	2.74		2.75	
Utility NPV	$209,300	$89,440	$217,900		$225,703	
Ratepayer Ratio	0.48	0.72	0.49		0.49	
Ratepayer NPV	($361,316)	($42,055)	($364,129)		($367,967)	
Participant Ratio	5.14	3.42	5.24		5.33	
Participant NPV	$500,717	$102,627	$512,129		$523,770	
Societal Ratio	3.69	3.93	3.79		3.84	
Societal NPV	$523,540	$138,959	$545,418		$566,268	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Custom Effiency Grants					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$115,000	$202,663	$115,000		$115,000	
Administration	$16,000	$4,155	$16,000		$16,000	
Evaluation, Measurement & Verification	$15,000	$4,030	$15,000		$15,000	
Advertising & Promotion	$5,000	$1,804	$5,000		$5,000	
Incentives	$180,000	$122,846	$180,000		$180,000	
Other	$3,000	$0	$3,000		$3,000	
Total Utility Costs	$334,000	$335,499	$334,000		$334,000	
Total Participants	18	28	18		18	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	2,979,450	1,674,604	2,979,450		2,979,450	
Annual kWh Savings at Generator	3,323,424	1,847,925	3,323,424		3,323,424	
Cost per Annual kWh Saved at Generator	$0.10	$0.18	$0.10		$0.10	
Lifetime Savings	44,691,750	28,138,637	44,691,750		44,691,750	
Peak kW Savings at Meter	556.16	344.66	556.16		556.16	
Peak kW Savings at Generator	620.37	380.28	620.37		620.37	
Cost per Peak kW Saved at Generator	$538	$882	$538		$538	
MN Ratio	5.99	4.93				
MN NPV	$2,723,169	$1,664,169				
Utility Ratio	3.25	3.29	3.34		3.36	
Utility NPV	$1,211,241	$768,530	$1,262,654		$1,306,670	
Ratepayer Ratio	0.58	3.29	0.59		0.60	
Ratepayer NPV	($1,256,089)	$768,530	($1,254,023)		($1,260,341)	
Participant Ratio	1.63	0.00	1.66		1.70	
Participant NPV	$1,027,331	$1,024,867	$1,076,677		$1,127,011	
Societal Ratio	1.65	9.82	1.70		1.74	
Societal NPV	$1,283,169	$1,875,048	$1,387,187		$1,482,695	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Drive Power					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$50,000	$49,024	$50,000		$50,000	
Administration	$15,000	$7,991	$15,000		$15,000	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$9,000	$7,079	$9,000		$9,000	
Incentives	$293,000	$542,740	$293,000		$293,000	
Other	$5,000	$0	$5,000		$5,000	
Total Utility Costs	$374,000	$606,834	$374,000		$374,000	
Total Participants	388	597	388		388	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	30%	10%	30%		30%	
Industrial	70%	90%	70%		70%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	6,311,175	10,761,490	6,311,175		6,311,175	
Annual kWh Savings at Generator	7,039,794	11,875,304	7,039,794		7,039,794	
Cost per Annual kWh Saved at Generator	$0.05	$0.05	$0.05		$0.05	
Lifetime Savings	94,391,937	178,129,562	94,391,937		94,391,937	
Peak kW Savings at Meter	691.13	1,155.09	691.13		691.13	
Peak kW Savings at Generator	770.92	1,274.47	770.92		770.92	
Cost per Peak kW Saved at Generator	$485	$476	$485		$485	
MN Ratio	7.52	9.75				
MN NPV	$5,234,762	$10,190,416				
Utility Ratio	3.69	9.15	3.76		3.75	
Utility NPV	$2,157,276	$4,943,922	$2,233,584		$2,304,965	
Ratepayer Ratio	0.50	0.55	0.50		0.51	
Ratepayer NPV	($2,983,726)	($4,552,628)	($3,010,239)		($3,043,734)	
Participant Ratio	4.85	4.83	4.95		5.04	
Participant NPV	$4,314,541	$7,961,885	$4,417,361		$4,522,237	
Societal Ratio	3.71	5.30	3.81		3.86	
Societal NPV	$4,408,300	$9,213,037	$4,590,611		$4,767,485	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Refrigeration					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$35,000	$16,631	$35,000		$35,000	
Administration	$11,000	$4,804	$11,000		$11,000	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$10,000	$3,608	$10,000		$10,000	
Incentives	$121,000	$15,785	$121,000		$121,000	
Other	$3,000	$0	$3,000		$3,000	
Total Utility Costs	$181,000	$40,828	$181,000		$181,000	
Total Participants	113	41	113		113	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	2,392,250	309,099	2,392,250		2,392,250	
Annual kWh Savings at Generator	2,668,433	341,091	2,668,433		2,668,433	
Cost per Annual kWh Saved at Generator	$0.07	$0.12	$0.07		$0.07	
Lifetime Savings	26,171,308	1,738,652	26,171,308		26,171,308	
Peak kW Savings at Meter	303.67	53.70	303.67		303.67	
Peak kW Savings at Generator	338.73	59.25	338.73		338.73	
Cost per Peak kW Saved at Generator	$534	$689	$534		$534	
MN Ratio	5.81	2.74				
MN NPV	$1,441,981	$80,423				
Utility Ratio	2.98	1.73	3.02		3.03	
Utility NPV	$592,637	$29,930	$609,198		$628,059	
Ratepayer Ratio	0.51	0.48	0.52		0.52	
Ratepayer NPV	($842,535)	($76,202)	($854,678)		($865,094)	
Participant Ratio	3.06	1.56	3.11		3.17	
Participant NPV	$1,046,979	$46,447	$1,075,683		$1,104,960	
Societal Ratio	2.53	1.26	2.59		2.64	
Societal NPV	$1,053,789	$26,177	$1,098,682		$1,146,112	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Energy Code Compliance					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$17,000	$17,532	$17,000		$17,000	
Administration	$5,000	$848	$5,000		$5,000	
Evaluation, Measurement & Verification	$1,000	$0	$1,000		$1,000	
Advertising & Promotion	$2,000	$0	$2,000		$2,000	
Incentives	$0	$0	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$25,000	$18,380	$25,000		$25,000	
Total Participants	0	0	0		0	
Financial Incentive		8,622				
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	532,991	0	1,771,118		2,076,787	
Annual kWh Savings at Generator	594,524	0	1,975,591		2,316,550	
Cost per Annual kWh Saved at Generator	$0.04	$0.00	$0.01		$0.01	
Lifetime Savings	532,990	-	1,771,117		2,076,787	
Peak kW Savings at Meter	60.84	0.00	202.18		237.08	
Peak kW Savings at Generator	67.87	0.00	225.52		264.45	
Cost per Peak kW Saved at Generator	$368	$0	$111		$95	
MN Ratio	1.47	0.00				
MN NPV	$12,232	($18,380)				
Utility Ratio	0.85	0.00	2.15		2.46	
Utility NPV	($4,066)	($18,380)	$37,981		$51,304	
Ratepayer Ratio	0.38	0.00	0.48		0.50	
Ratepayer NPV	($38,296)	($18,380)	($78,040)		($87,461)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$34,230	$0	$116,020		$138,765	
Societal Ratio	1.45	0.00	3.84		4.38	
Societal NPV	$12,232	($18,380)	$93,995		$119,196	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Advertising and Education					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$25,000	$3,502	$25,000		$25,000	
Administration	$3,000	$3,485	$3,000		$3,000	
Evaluation, Measurement & Verification	$500	$0	$500		$500	
Advertising & Promotion	$0	$22,891	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$28,500	$29,877	$28,500		$28,500	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	100%	10%	100%		100%	
Industrial	0%	90%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($28,500)	($29,877)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($28,500)	($29,877)	($28,500)		($28,500)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($28,500)	($29,877)	($28,500)		($28,500)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($28,500)	($29,877)	($28,500)		($28,500)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Integrated Building Design Plus					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$205,000	$140,072	$205,000		$205,000	
Administration	$10,000	$5,100	$10,000		$10,000	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$5,000	$489	$5,000		$5,000	
Incentives	$0	$0	$0		$0	
Other	$30,000	$0	$30,000		$30,000	
Total Utility Costs	$252,000	$145,661	$252,000		$252,000	
Total Participants	6	4	6		6	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	100%	10%	100%		100%	
Industrial	0%	90%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($252,000)	($145,661)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($252,000)	($145,661)	($252,000)		($252,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($252,000)	($145,661)	($252,000)		($252,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($252,000)	($145,661)	($252,000)		($252,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Financing					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$5,000	$1,556	$5,000		$5,000	
Administration	$2,500	$0	$2,500		$2,500	
Evaluation, Measurement & Verification	$0	$0	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$6,500	$6,256	$6,500		$6,500	
Other	$1,000	($46)	$1,000		$1,000	
Total Utility Costs	$15,000	$7,766	$15,000		$15,000	
Total Participants	5	0	5		5	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($15,000)	$0				
Utility Ratio	0.00	0.37	0.00		0.00	
Utility NPV	($15,000)	($19,397)	($15,000)		($15,000)	
Ratepayer Ratio	0.00	0.21	0.00		0.00	
Ratepayer NPV	($15,000)	($44,008)	($15,000)		($15,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$6,500	$28,627	$6,500		$6,500	
Societal Ratio	0.00	0.81	0.00		0.00	
Societal NPV	($8,500)	($5,039)	($8,500)		($8,500)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Implementation and Training					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$150,000	$147,725	$150,000		$150,000	
Administration	$4,000	$4,067	$4,000		$4,000	
Evaluation, Measurement & Verification	$40,000	$1,141	$40,000		$40,000	
Advertising & Promotion	$1,000	$737	$1,000		$1,000	
Incentives	$0	$5,307	$0		$0	
Other	$5,000	$1,490	$5,000		$5,000	
Total Utility Costs	$200,000	$160,466	$200,000		$200,000	
Total Participants	250	415	250		250	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($200,000)	($160,466)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($200,000)	($160,466)	($200,000)		($200,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($200,000)	($160,466)	($200,000)		($200,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$5,307	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($200,000)	($155,160)	($200,000)		($200,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Home Heating And Cooling Fuel Switching					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$9,000	$3,645	$9,000		$9,000	
Administration	$1,600	$0	$1,600		$1,600	
Evaluation, Measurement & Verification	$2,000	$0	$2,000		$2,000	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$137,400	$106,750	$359,900		$359,900	
Other	$0	$0	$0		$0	
Total Utility Costs	$150,000	$110,395	$372,500		$372,500	
Total Participants	85	74	135		225	
Financial Incentive						
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	0%	0%		0%	
Industrial	10%	10%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	1,517,184	1,134,496	1,517,184		1,517,184	
Annual kWh Savings at Generator	1,692,341	1,251,917	1,692,341		1,692,341	
Cost per Annual kWh Saved at Generator	$0.09	$0.09	$0.22		$0.22	
Lifetime Savings	27,476,388	22,534,499	27,476,388		27,476,388	
Peak kW Savings at Meter	100.79	0.00	100.79		100.79	
Peak kW Savings at Generator	112.43	0.00	112.43		112.43	
Cost per Peak kW Saved at Generator	$1,334	$0	$3,313		$3,313	
MN Ratio	6.11	0.00				
MN NPV	$1,395,948	$1,088,437				
Utility Ratio	2.82	0.00	1.60		1.63	
Utility NPV	$499,294	($160,466)	$298,077		$319,284	
Ratepayer Ratio	0.34	0.00	0.31		0.32	
Ratepayer NPV	($1,531,433)	($160,466)	($1,773,265)		($1,793,484)	
Participant Ratio	2.46	0.00	2.02		2.06	
Participant NPV	$1,285,299	$5,307	$1,228,414		$1,269,840	
Societal Ratio	1.64	0.00	1.29		1.32	
Societal NPV	$650,520	($155,160)	$383,178		$435,998	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Electric Vehicles Residential					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$16,000	$7,629	$16,000		$16,000	
Administration	$5,000	$125	$5,000		$5,000	
Evaluation, Measurement & Verification	$5,000	$0	$5,000		$5,000	
Advertising & Promotion	$5,250	$3,739	$5,250		$5,250	
Incentives	$162,750	$99,810	$162,750		$162,750	
Other	$0	$0	$0		$0	
Total Utility Costs	$194,000	$111,304	$194,000		$194,000	
Total Participants	178	303	178		178	
Financial Incentive						
% of Spending by Customer Segments						
Residential	100%	100%	100%		100%	
Commercial	0%	10%	0%		0%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	1,282,746	510,832	1,282,746		1,282,746	
Annual kWh Savings at Generator	1,430,838	563,703	1,430,838		1,430,838	
Cost per Annual kWh Saved at Generator	$0.14	$0.20	$0.14		$0.14	
Lifetime Savings	11,750,782	5,467,993	11,750,782		11,750,782	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	2.65	0.00				
MN NPV	$395,411	$186,839				
Utility Ratio	1.13	0.00	1.12		1.13	
Utility NPV	$31,229	($160,466)	$29,263		$32,798	
Ratepayer Ratio	0.22	0.00	0.22		0.22	
Ratepayer NPV	($964,224)	($160,466)	($986,100)		($1,002,872)	
Participant Ratio	1.41	0.00	1.44		1.46	
Participant NPV	$338,554	$5,307	$358,463		$378,770	
Societal Ratio	0.71	0.00	0.72		0.74	
Societal NPV	($261,489)	($155,160)	($251,824)		($236,027)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Commercial Heat Pumps Fuel Switching					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$15,000	$2,969	$15,000		$15,000	
Administration	$2,000	$0	$2,000		$2,000	
Evaluation, Measurement & Verification	$3,000	$0	$3,000		$3,000	
Advertising & Promotion	$1,600	$0	$1,600		$1,600	
Incentives	$82,800	$66,100	$122,800		$122,800	
Other	$0	$0	$0		$0	
Total Utility Costs	$104,400	$69,069	$144,400		$144,400	
Total Participants	62	40	87		87	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	766,330	603,324	766,330		766,330	
Annual kWh Savings at Generator	854,802	665,768	854,802		854,802	
Cost per Annual kWh Saved at Generator	$0.12	$0.10	$0.17		$0.17	
Lifetime Savings	11,749,805	9,986,520	11,749,805		11,749,805	
Peak kW Savings at Meter	49.77	0.00	49.77		49.77	
Peak kW Savings at Generator	55.51	0.00	55.51		55.51	
Cost per Peak kW Saved at Generator	$1,881	$0	$2,601		$2,601	
MN Ratio	4.51	7.42				
MN NPV	$533,137	$443,125				
Utility Ratio	2.00	2.95	1.63		1.65	
Utility NPV	$157,543	$134,608	$124,944		$132,289	
Ratepayer Ratio	0.44	0.40	0.42		0.43	
Ratepayer NPV	($403,223)	($306,364)	($447,037)		($451,132)	
Participant Ratio	1.12	2.78	1.10		1.12	
Participant NPV	$68,196	$324,535	$64,412		$75,851	
Societal Ratio	1.06	2.76	1.01		1.04	
Societal NPV	$40,567	$326,688	$5,859		$26,102	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Electric Commercial Vehicles					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$1,000	$2,569	$1,000		$1,000	
Administration	$600	$0	$600		$600	
Evaluation, Measurement & Verification	$600	$122	$600		$600	
Advertising & Promotion	$500	$0	$500		$500	
Incentives	$11,300	$15,000	$11,300		$11,300	
Other	$0	$0	$0		$0	
Total Utility Costs	$14,000	$17,691	$14,000		$14,000	
Total Participants	7	6	7		7	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	90%	10%	90%		90%	
Industrial	10%	90%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	250,375	398,316	250,375		250,375	
Annual kWh Savings at Generator	279,280	439,542	279,280		279,280	
Cost per Annual kWh Saved at Generator	$0.05	$0.04	$0.05		$0.05	
Lifetime Savings	1,870,224	2,637,253	1,870,224		1,870,224	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	4.55	8.15				
MN NPV	$77,497	$126,409				
Utility Ratio	1.88	2.87	1.86		1.85	
Utility NPV	$19,826	$45,065	$19,342		$19,629	
Ratepayer Ratio	0.37	0.41	0.36		0.36	
Ratepayer NPV	($72,153)	($89,830)	($74,477)		($76,066)	
Participant Ratio	0.37	2.56	0.38		0.39	
Participant NPV	($172,181)	$91,244	($170,342)		($168,465)	
Societal Ratio	0.35	2.35	0.35		0.36	
Societal NPV	($186,663)	$82,759	($185,282)		($183,081)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Load Management					
Status						
Year:	**2024 Proposed**	**2024 Actual**	**2025 Proposed**	**2025 Actual**	**2026 Proposed**	**2026 Actual**
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$65,000	$22,957	$65,000		$65,000	
Administration	$15,500	$6,127	$15,000		$15,000	
Evaluation, Measurement & Verification	$6,000	$9,577	$6,000		$6,000	
Advertising & Promotion	$100,000	$59,007	$100,000		$100,000	
Incentives	$119,000	$101,158	$119,000		$119,000	
Other	$6,000	$0	$6,000		$6,000	
Total Utility Costs	$311,500	$198,826	$311,000		$311,000	
Total Participants	10,241	1,679	10,241		10,241	
Financial Incentive						
% of Spending by Customer Segments						
Residential	90%	90%	0%		0%	
Commercial	10%	10%	90%		90%	
Industrial	0%	0%	10%		10%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-	-	-		-	
Peak kW Savings at Meter	201.70	9,397.95	0.00		0.00	
Peak kW Savings at Generator	60,580.30	10,369.23	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	24.37	6.53				
MN NPV	$7,279,278	$1,100,450				
Utility Ratio	24.37	6.53	25.47		25.71	
Utility NPV	$7,279,278	$1,100,450	$7,610,101		$7,684,654	
Ratepayer Ratio	7.95	3.43	8.19		8.15	
Ratepayer NPV	$6,635,444	$920,495	$6,953,390		$7,014,809	
Participant Ratio	2.09	4.39	2.12		2.16	
Participant NPV	$397,534	$217,138	$410,410		$423,545	
Societal Ratio	13.61	8.04	14.21		14.35	
Societal NPV	$7,032,978	$1,137,633	$7,363,801		$7,438,354	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	EmergingTechnology Accelerator					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$116,167	$0	$264,000		$270,000	
Administration	$0	$1,266	$0		$0	
Evaluation, Measurement & Verification	$0	$399	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$116,167	$0		$0	
Other	$0	$0	$0		$0	
Total Utility Costs	$116,167	$117,832	$264,000		$270,000	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	100%	100%	100%		100%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($116,167)	($117,832)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($116,167)	($117,832)	($264,000)		($270,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($116,167)	($117,832)	($264,000)		($270,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($116,167)	($117,832)	($264,000)		($270,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	POP SOLAR					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$14,000	$21,744	$14,000		$14,000	
Administration	$3,000	$2,810	$3,000		$3,000	
Evaluation, Measurement & Verification	$2,000	$148	$2,000		$2,000	
Advertising & Promotion	$1,000	$1,777	$1,000		$1,000	
Incentives	$960,000	$406,284	$960,000		$960,000	
Other	$20,000	$0	$20,000		$20,000	
Total Utility Costs	$1,000,000	$432,763	$1,000,000		$1,000,000	
Total Participants	16	9	16	9	16	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	100%	100%	100%		100%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	0%	0%	0%		0%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	1,412,480	468,223	1,412,480		1,412,480	
Annual kWh Savings at Generator	1,575,549	516,684	1,575,549		1,575,549	
Cost per Annual kWh Saved at Generator	$0.63	$0.84	$0.63		$0.63	
Lifetime Savings	35,312,000	12,917,094	35,312,000		35,312,000	
Peak kW Savings at Meter	706.24	201.70	706.24		706.24	
Peak kW Savings at Generator	787.77	222.55	787.77		787.77	
Cost per Peak kW Saved at Generator	$1,269	$1,945	$1,269		$1,269	
MN Ratio	2.77	2.47				
MN NPV	$2,327,587	$694,127				
Utility Ratio	1.74	1.51	1.80		1.82	
Utility NPV	$858,550	$220,685	$925,436		$968,192	
Ratepayer Ratio	0.58	0.54	0.60		0.61	
Ratepayer NPV	($1,444,023)	($550,718)	($1,399,766)		($1,378,047)	
Participant Ratio	1.38	1.14	1.39		1.40	
Participant NPV	$894,573	$148,458	$917,203		$938,239	
Societal Ratio	1.36	1.11	1.40		1.43	
Societal NPV	$919,587	$111,594	$1,035,800		$1,121,888	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Planning - Regulatory Affairs					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$0	$50,518	$0		$0	
Administration	$0	$111,559	$0		$0	
Evaluation, Measurement & Verification	$0	$55,439	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$280,000	$0	$280,000		$280,000	
Total Utility Costs	$280,000	$217,516	$280,000		$280,000	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	100%	100%	100%		100%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($280,000)	($217,516)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($280,000)	($217,516)	($280,000)		($280,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($280,000)	($217,516)	($280,000)		($280,000)	
Participant Ratio	0.00	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($280,000)	($217,516)	($280,000)		($280,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	Research and Deveopment					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$0	$69,302	$0		$0	
Administration	$0	$0	$0		$0	
Evaluation, Measurement & Verification	$0	$0	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$150,000	$0	$150,000		$150,000	
Total Utility Costs	$150,000	$69,302	$150,000		$150,000	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	100%	100%	100%		100%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($150,000)	($69,302)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($150,000)	($69,302)	($150,000)		($150,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($150,000)	($69,302)	($150,000)		($150,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($150,000)	($69,302)	($150,000)		($150,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	NGEA - Regulatory Assessments					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$0	$0	$0		$0	
Administration	$0	$0	$0		$0	
Evaluation, Measurement & Verification	$0	$0	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$125,000	$78,524	$125,000		$125,000	
Total Utility Costs	$125,000	$78,524	$125,000		$125,000	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	100%	100%	100%		100%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($125,000)	($78,524)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($125,000)	($78,524)	($125,000)		($125,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($125,000)	($78,524)	($125,000)		($125,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($125,000)	($78,524)	($125,000)		($125,000)	

* Percentage derived from 2020 and 2021 Census data.

Energy Conservation and Optimization
Program Sheets
Otter Tail Power Company

Category:	PUC Assessments					
Status						
Year:	2024 Proposed	2024 Actual	2025 Proposed	2025 Actual	2026 Proposed	2026 Actual
kWh Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
kW Line Loss Factor	10.350%	10.350%	10.350%		10.350%	
Utility Costs						
Delivery	$0	$0	$0		$0	
Administration	$0	$0	$0		$0	
Evaluation, Measurement & Verification	$0	$0	$0		$0	
Advertising & Promotion	$0	$0	$0		$0	
Incentives	$0	$0	$0		$0	
Other	$15,000	$2,010	$15,000		$15,000	
Total Utility Costs	$15,000	$2,010	$15,000		$15,000	
Total Participants	0	0	0		0	
Financial Incentive						
% of Spending by Customer Segments						
Residential	0%	0%	0%		0%	
Commercial	0%	0%	0%		0%	
Industrial	0%	0%	0%		0%	
Farm	0%	0%	0%		0%	
Other	100%	100%	100%		100%	
Total % of Spending	100%	100%	100%		100%	
Low-Income Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Renter Participation*						
Participants % (% of Total Participants)						
Budget % (% of Total Utility Costs)						
Energy Savings						
Annual kWh Savings at Meter	0	0	0		0	
Annual kWh Savings at Generator	0	0	0		0	
Cost per Annual kWh Saved at Generator	$0.00	$0.00	$0.00		$0.00	
Lifetime Savings	-		-		-	
Peak kW Savings at Meter	0.00	0.00	0.00		0.00	
Peak kW Savings at Generator	0.00	0.00	0.00		0.00	
Cost per Peak kW Saved at Generator	$0	$0	$0		$0	
MN Ratio	0.00	0.00				
MN NPV	($15,000)	($2,010)				
Utility Ratio	0.00	0.00	0.00		0.00	
Utility NPV	($15,000)	($2,010)	($15,000)		($15,000)	
Ratepayer Ratio	0.00	0.00	0.00		0.00	
Ratepayer NPV	($15,000)	($2,010)	($15,000)		($15,000)	
Participant Ratio	inf.	0.00	inf.		inf.	
Participant NPV	$0	$0	$0		$0	
Societal Ratio	0.00	0.00	0.00		0.00	
Societal NPV	($15,000)	($2,010)	($15,000)		($15,000)	

* Percentage derived from 2020 and 2021 Census data.

Appendix D – Customer Notice

Otter Tail Power Company
Minnesota ECO

Customer notice

The Minnesota Public Utilities Commission approved changes to our Energy Conservation and Optimization (ECO) Rider, which is part of the Resource Adjustment on your monthly electric bill. This rider recovers costs associated with energy-efficiency programs that help you save energy. The table below shows new rates that begin November 1, 2025.

Service category	Section	Rate per kWh
Residential	9.01, 9.02	$0.00578
Farm	9.03	$0.00582
General Service	10.01, 10.02, 10.03, 10.07	$0.00557
Large General Service	10.04, 10.05, 10.06, 14.02, 14.03	$0.00599
Irrigation Service	11.02	$0.00358
Outdoor Lighting	11.03, 11.04, 11.07	$0.00647
OPA	11.05	$0.00517
Controlled Service Deferred	14.01, 14.06	$0.00592
Controlled Service Interruptible	14.04	$0.00662
Controlled Service Off Peak	14.07, 14.12	$0.00530

For more information, contact us at 800-257-4044 or visit otpco.com.

CERTIFICATE OF SERVICE

RE: Status Report – 2024 ECO Activities
Docket No. E017/CIP-23-94

In the Matter of Otter Tail Power Company's Annual Filing of the Demand Side Management Financial Incentive Project
Docket No. E017/M-25-49

In the Matter of Otter Tail Power Company's Annual Filing to Update the Energy Conservation and Optimization Rider
Docket No. E017/M-25-49

I, Stacy Wahlund, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

Otter Tail Power Company
Initial Filing

Dated this **1st** day of **April, 2025.**

/s/ Stacy Wahlund
Stacy Wahlund
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8338

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilties		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	23-94CIP-23-94
2	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	23-94CIP-23-94
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-94CIP-23-94
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-94CIP-23-94
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	23-94CIP-23-94
6	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	23-94CIP-23-94
7	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	23-94CIP-23-94
8	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	23-94CIP-23-94
9	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	23-94CIP-23-94
10	Brandon	Crawford	brandonc@cubminnesota.org	Citizens Utility Board of Minnesota		332 Minnesota St Ste W1360 St. Paul MN, 55101 United States	Electronic Service		No	23-94CIP-23-94
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	23-94CIP-23-94
12	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	23-94CIP-23-94
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN,	Electronic Service		No	23-94CIP-23-94

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55435 United States				
14	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	23-94CIP-23-94
15	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	23-94CIP-23-94
16	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	23-94CIP-23-94
17	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	23-94CIP-23-94
18	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	23-94CIP-23-94
19	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-94CIP-23-94
20	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	23-94CIP-23-94
21	Jason	Grenier	jgrenier@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	23-94CIP-23-94
22	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	23-94CIP-23-94
23	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	23-94CIP-23-94
24	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	23-94CIP-23-94
25	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-94CIP-23-94
26	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	23-94CIP-23-94
27	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	23-94CIP-23-94

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
28	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	23-94CIP-23-94
29	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	23-94CIP-23-94
30	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	23-94CIP-23-94
31	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	23-94CIP-23-94
32	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	23-94CIP-23-94
33	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	23-94CIP-23-94
34	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	23-94CIP-23-94
35	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-94CIP-23-94
36	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	23-94CIP-23-94
37	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	23-94CIP-23-94
38	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	23-94CIP-23-94
39	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	23-94CIP-23-94
40	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	23-94CIP-23-94
41	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential	1400 BRM Tower 445 Minnesota St St. Paul MN,	Electronic Service		Yes	23-94CIP-23-94

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
					Utilities Division	55101-2131 United States				
42	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	23-94CIP-23-94
43	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	23-94CIP-23-94
44	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	23-94CIP-23-94
45	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	23-94CIP-23-94
46	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	23-94CIP-23-94
47	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	23-94CIP-23-94
48	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	23-94CIP-23-94
49	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	23-94CIP-23-94
50	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	23-94CIP-23-94
51	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	23-94CIP-23-94
52	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	23-94CIP-23-94

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilties		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
2	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
3	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
4	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
5	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
6	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
7	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
8	Generic	Commerce Attorneys	commerce.attorneys@ag.state.mn.us		Office of the Attorney General - Department of Commerce	445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
9	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
10	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
11	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN, 55435	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
12	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
13	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
14	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
15	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	CIP SPECIAL SERVICE LIST
16	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
17	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
18	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
19	Jason	Grenier	jgrenier@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
20	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
21	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester MN, 55902-3303 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
22	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
23	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						United States				
24	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
25	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
26	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
27	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
28	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
29	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
30	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
31	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	CIP SPECIAL SERVICE LIST
32	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
33	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
34	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
35	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
36	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
37	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
38	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
39	Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us		Office of the Attorney General - Residential Utilities Division	1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
40	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
41	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
42	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
43	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
44	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
45	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
46	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						Blvd., Suite 390 Saint Paul MN, 55102 United States				
47	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
48	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
49	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST
50	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	CIP SPECIAL SERVICE LIST

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
1	Julie	Ambach	juliea@cmmpa.org	Shakopee Public Utilties		255 Sarazin St Shakopee MN, 55379 United States	Electronic Service		No	M-25-49
2	Anjali	Bains	bains@fresh-energy.org	Fresh Energy		408 Saint Peter Ste 220 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-49
3	Tom	Balster	tombalster@alliantenergy.com	Interstate Power & Light Company		PO Box 351 200 1st St SE Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-49
4	Lisa	Beckner	lbeckner@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-49
5	William	Black	bblack@mmua.org	MMUA		Suite 200 3131 Fernbrook Lane North Plymouth MN, 55447 United States	Electronic Service		No	M-25-49
6	Annika	Brindel	abrindel@nhtinc.org	National Housing Trust		1101 30th Street NW Ste 100A Washington DC, 20007 United States	Electronic Service		No	M-25-49
7	Matthew	Brodin	mbrodin@allete.com	Minnesota Power		30 West Superior Street Duluth MN, 55802 United States	Electronic Service		No	M-25-49
8	Christina	Brusven	cbrusven@fredlaw.com	Fredrikson Byron		60 S 6th St Ste 1500 Minneapolis MN, 55402-4400 United States	Electronic Service		No	M-25-49
9	Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.		12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States	Electronic Service		No	M-25-49
10	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	M-25-49
11	George	Crocker	gwillc@nawo.org	North American Water Office		5093 Keats Avenue Lake Elmo MN, 55042 United States	Electronic Service		No	M-25-49
12	Patrick	Deal	pdeal@mnchamber.com	Minnesota Chamber of Commerce		400 Robert St N Ste 1500 Saint Paul MN, 55101 United States	Electronic Service		No	M-25-49
13	Charles	Drayton	charles.drayton@enbridge.com	Enbridge Energy Company, Inc.		7701 France Ave S Ste 600 Edina MN,	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						55435 United States				
14	Jim	Erchul	jerchul@dbnhs.org	Daytons Bluff Neighborhood Housing Sv.		823 E 7th St St. Paul MN, 55106 United States	Electronic Service		No	M-25-49
15	Greg	Ernst	gaernst@q.com	G. A. Ernst & Associates, Inc.		2377 Union Lake Trl Northfield MN, 55057 United States	Electronic Service		No	M-25-49
16	Melissa S	Feine	melissa.feine@semcac.org	SEMCAC		PO Box 549 204 S Elm St Rushford MN, 55971 United States	Electronic Service		No	M-25-49
17	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	M-25-49
18	Karolanne	Foley	karolanne.foley@dairylandpower.com	Dairyland Power Cooperative		PO Box 817 La Crosse WI, 54602-0817 United States	Electronic Service		No	M-25-49
19	Jessica	Fyhrie	jfyhrie@otpco.com	Otter Tail Power Company		PO Box 496 Fergus Falls MN, 56538-0496 United States	Electronic Service		No	M-25-49
20	Tyler	Glewwe	tyler.glewwe@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
21	Elizabeth	Glidden	elizabeth.glidden@mhponline.org	Minnesota Housing Partnership		2446 University Ave W Ste 140 St Paul MN, 55114 United States	Electronic Service		No	M-25-49
22	Jenny	Glumack	jenny@mrea.org	Minnesota Rural Electric Association		11640 73rd Ave N Maple Grove MN, 55369 United States	Electronic Service		No	M-25-49
23	Laura	Goldberg	lgoldberg@nrdc.org	Natural Resources Defense Council		20 N. Upper Wacker Dr. Suite 1600 Chicago IL, 60606 United States	Electronic Service		No	M-25-49
24	Jason	Grenier	jgrenier@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
25	Jeffrey	Haase	jhaase@grenergy.com	Great River Energy		12300 Elm Creek Blvd Maple Grove MN, 55369 United States	Electronic Service		No	M-25-49
26	Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024 United States	Electronic Service		No	M-25-49
27	Joe	Hoffman	ja.hoffman@smmpa.org	SMMPA		500 First Ave SW Rochester	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
						MN, 55902-3303 United States				
28	Dave	Johnson	dave.johnson@aeoa.org	Arrowhead Economic Opportunity Agency		702 3rd Ave S Virginia MN, 55792 United States	Electronic Service		No	M-25-49
29	Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.		11 East Superior St Ste 125 Duluth MN, 55802 United States	Electronic Service		No	M-25-49
30	Martin	Kapsch	martin.kapsch@centerpointenergy.com	CenterPoint Energy Minnesota Gas		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
31	Deborah	Knoll	dknoll@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802 United States	Electronic Service		No	M-25-49
32	Kathryn	Knudson	kathryn.knudson@centerpointenergy.com	CenterPoint Energy Minnesota Gas		null null, null United States	Electronic Service		No	M-25-49
33	Tina	Koecher	tkoecher@mnpower.com	Minnesota Power		30 W Superior St Duluth MN, 55802-2093 United States	Electronic Service		No	M-25-49
34	James D.	Larson	james.larson@avantenergy.com	Avant Energy Services		220 S 6th St Ste 1300 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
35	Martin	Lepak	martin.lepak@aeoa.org	Arrowhead Economic Opportunity		702 S 3rd Ave Virginia MN, 55792 United States	Electronic Service		No	M-25-49
36	Corey	Lubovich	coreyl@hpuc.com	Hibbing Public Utilities Commission		1902 6th Ave E Hibbing MN, 55746 United States	Electronic Service		No	M-25-49
37	Kavita	Maini	kmaini@wi.rr.com	KM Energy Consulting, LLC		961 N Lost Woods Rd Oconomowoc WI, 53066 United States	Electronic Service		No	M-25-49
38	Josh	Mason	jmason@rpu.org	Rochester Public Utilities		4000 E River Rd NE Rochester MN, 55906 United States	Electronic Service		No	M-25-49
39	Scot	McClure	scotmcclure@alliantenergy.com	Interstate Power And Light Company		4902 N Biltmore Ln PO Box 77007 Madison WI, 53707-1007 United States	Electronic Service		No	M-25-49
40	David	Moeller	dmoeller@allete.com	Minnesota Power			Electronic Service		No	M-25-49
41	Andrew	Moratzka	andrew.moratzka@stoel.com	Stoel Rives LLP		33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
42	Carl	Nelson	cnelson@mncee.org	Center for Energy and Environment		212 3rd Ave N Ste 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-49
43	Samantha	Norris	samanthanorris@alliantenergy.com	Interstate Power and Light Company		200 1st Street SE PO Box 351 Cedar Rapids IA, 52406-0351 United States	Electronic Service		No	M-25-49
44	Matthew	Olsen	molsen@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
45	Audrey	Partridge	audrey.peer@centerpointenergy.com	CenterPoint Energy Minnesota Gas		212 3rd Ave. N. Suite 560 Minneapolis MN, 55401 United States	Electronic Service		No	M-25-49
46	Lisa	Pickard	lseverson@minnkota.com	Minnkota Power Cooperative		5301 32nd Ave S Grand Forks ND, 58201 United States	Electronic Service		No	M-25-49
47	Bill	Poppert	info@technologycos.com	Technology North		2433 Highwood Ave St. Paul MN, 55119 United States	Electronic Service		No	M-25-49
48	Generic Notice	Regulatory	regulatory_filing_coordinators@otpco.com	Otter Tail Power Company		215 S. Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
49	Dave	Reinke	dreinke@dakotaelectric.com	Dakota Electric Association		4300 220th St W Farmington MN, 55024-9583 United States	Electronic Service		No	M-25-49
50	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	M-25-49
51	Jean	Schafer	jeans@bepc.com	Basin Electric Power Cooperative		1717 E Interstate Ave Bismarck ND, 58501 United States	Electronic Service		No	M-25-49
52	Christine	Schwartz	regulatory.records@xcelenergy.com	Xcel Energy		414 Nicollet Mall FL 7 Minneapolis MN, 55401-1993 United States	Electronic Service		No	M-25-49
53	Will	Seuffert	will.seuffert@state.mn.us		Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul MN, 55101 United States	Electronic Service		Yes	M-25-49
54	Rick	Sisk	rsisk@trccompanies.com	Lockheed Martin		1000 Clark Ave. St. Louis MO, 63102 United States	Electronic Service		No	M-25-49

#	First Name	Last Name	Email	Organization	Agency	Address	Delivery Method	Alternate Delivery Method	View Trade Secret	Service List Name
55	Ken	Smith	ken.smith@districtenergy.com	District Energy St. Paul Inc.		76 W Kellogg Blvd St. Paul MN, 55102 United States	Electronic Service		No	M-25-49
56	Anna	Sommer	asommer@energyfuturesgroup.com	Energy Futures Group		PO Box 692 Canton NY, 13617 United States	Electronic Service		No	M-25-49
57	Russ	Stark	russ.stark@ci.stpaul.mn.us	City of St. Paul		Mayor's Office 15 W. Kellogg Blvd., Suite 390 Saint Paul MN, 55102 United States	Electronic Service		No	M-25-49
58	Cary	Stephenson	cstephenson@otpco.com	Otter Tail Power Company		215 South Cascade Street Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
59	Stuart	Tommerdahl	stommerdahl@otpco.com	Otter Tail Power Company		215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States	Electronic Service		No	M-25-49
60	Kodi	Verhalen	kverhalen@taftlaw.com	Taft Stettinius & Hollister LLP		80 S 8th St Ste 2200 Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
61	Michael	Volker	mvolker@eastriver.coop	East River Electric Power Coop		211 S. Harth Ave Madison SD, 57042 United States	Electronic Service		No	M-25-49
62	Ethan	Warner	ethan.warner@centerpointenergy.com	CenterPoint Energy		505 Nicollet Mall Minneapolis MN, 55402 United States	Electronic Service		No	M-25-49
63	Robyn	Woeste	robynwoeste@alliantenergy.com	Interstate Power and Light Company		200 First St SE Cedar Rapids IA, 52401 United States	Electronic Service		No	M-25-49
64	Cristina	Zuniga	czuniga@otpco.com	Otter Tail Power Company		215 South Cascade Street PO Box 496 Fergus Falls MN, 56538 United States	Electronic Service		No	M-25-49