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December 29, 2021



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

**RE: Otter Tail Power Company
In the Matter of Otter Tail Power Company's 2022-2036 Integrated Resource Plan
Docket No. E-017/RP-21-339
Comments to the Commission's November 30, 2021, Notice of Procedural
Comment Period**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail or Company) submits this response to the Minnesota Public Utilities Commission's (Commission's) November 30, 2021, Notice of Procedural Comment Period in the above-referenced docket. The Notice requested comments in response to the Institute for Local Self-Reliance (ILSR) and Vote Solar's November 2, 2021, Letter. In the Notice, the Commission requested responses to the following questions:

1. What process should the Commission use to consider the Institute for Local Self-Reliance and Vote Solar (ILSR/VS) request, given multiple ongoing IRPs? For example, should the request be moved to a separate docket, or discussed in individual resource plan dockets?
2. Are there other issues or concerns related to this matter?

Otter Tail believes that the ILSR request for Otter Tail customers to pay for ILSR's intervenor modeling costs is inappropriate and unnecessary and should be addressed in each utility's open proceedings¹ by the Commission.

I. OVERVIEW

Otter Tail filed its Integrated Resource Plan (IRP) on September 1, 2021. Initial Comments to Otter Tail's petition were originally scheduled to be due January 10, 2022, with Reply Comments due

¹ Utility Integrated Resource Plans in Docket Nos E-002/RP-19-368, E-015/RP-21-33, and E-017/RP-21-339.

March 10, 2022.² The current deadline for Initial Comments is April 11, 2022, with Reply Comments due June 13, 2022.³ The current parties participating in the proceeding include: (1) Minnesota Department of Commerce, Division of Energy Resources, (2) Office of the Attorney General – Residential Utilities Division, and (3) Fresh Energy, Clean Grid Alliance, Sierra Club, and Minnesota Center for Environmental Advocacy, (collectively, “Clean Energy Organizations”).⁴

Otter Tail provides the following reasons the request from ILSR should be denied by the Commission in this proceeding:

1. Intervening parties with the software are already participants.
2. ILSR is not a party to Otter Tail’s existing proceeding and Otter Tail is not aware of ILSR participating in any past Otter Tail IRP proceedings.
3. Funding borne by Minnesota customers is appropriately handled at the Legislature and not in this regulatory proceeding.
4. Minnesota customers should not pay for such modeling software that can be used to conduct modeling in other jurisdictions.
5. Minnesota customers funding the modeling software for an additional intervenor unnecessarily expands and creates a longer IRP process at no or a minimal value added to our Minnesota customers.

II. CONCLUSION

For the foregoing reasons, Otter Tail does not believe the burden of intervenor modeling costs for ILSR should be borne by Minnesota customers. Otter Tail respectfully requests that in this Docket the Commission deny the request from ILSR for Minnesota customers to pay for its intervenor modeling costs in utility resource plan dockets.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8989 or at njensen@otpc.com.

Sincerely,

/s/ NATHAN JENSEN
Nathan Jensen
Manager, Resource Planning

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Enclosures
By electronic filing
c: Service List

² Commission’s September 10, 2021, Notice of Comment Period in Docket No. E017/RP-21-339.

³ Commission’s November 3, 2021, Notice of Extended Comment Period in Docket No. E017/RP-21-339.

⁴ The Clean Energy Organization’s October 27, 2021, Petition to Intervene has not yet been granted. Otter Tail has responded to information requests from this group.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2022-2036 Resource Plan
Docket No. E017/RP-21-339**

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

**Otter Tail Power Company
Comments to the Commission's November 30, 2021, Notice of Procedural
Comment Period**

Dated this 29th day of **December, 2021**.

/s/ Kim Ward

Kim Ward, Regulatory
Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
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(218) 739-8268

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Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1400 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_21-339_RP-21-339
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