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August 1, 2022



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

**RE: In the Matter of the Distribution System Planning for Otter Tail
Power Company
In the Matter of a Commission Inquiry into Electric Vehicle Charging
and Infrastructure
Docket Nos. E017/M-21-612 and E999/CI-17-879
Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Comments in the above-referenced matters. Otter Tail appreciates the opportunity to provide comments in this matter and the Commission staff's work with the utilities and stakeholders through the process.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact Michael Riewer at 218-739-8565 or mriewer@otpc.com or Jason Grenier at 218-739-8639 or jgrenier@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ MICHAEL RIEWER
Michael Riewer
Manager, System Infrastructure & Reliability

/s/ JASON GRENIER
Jason Grenier
Manager, Market Planning

sjw
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of the Distribution
System Planning for Otter Tail
Power Company**

Docket No. E017/M-21-612

**In the Matter of a Commission
Inquiry into Electric Vehicle
Charging and Infrastructure**

Docket No. E999/CI-17-879

COMMENTS

I. INTRODUCTION

Otter Tail Power Company's (Otter Tail) comments are in response to the Minnesota Public Utilities Commission's (Commission) July 1, 2022, filing providing a Notice of Comment Period in the above referenced dockets. Otter Tail appreciates the opportunity to provide comments in this matter and the Commission staff's work with the utilities and stakeholders through the process.

II. TOPICS FOR COMMENT AND OTTER TAIL RESPONSES:

The following topics were included in Commission staff's Notice of Comment Period. Otter Tail's responses are included following each question.

1. Should the Commission combine Minnesota Power, Otter Tail Power, and Xcel Energy's Transportation Electrification Plans (TEPs) with their Integrated Distribution Plans (IDPs)?

Otter Tail agrees, the Transportation Electrification Plans should be combined with the Integrated Distribution Plans. Otter Tail believes combining these two filings will create procedural efficiencies and reduce duplicative information being reported.

2. Are the staff-amended IDP filing requirements for Minnesota Power (Attachment A), Otter Tail Power (Attachment B), and Xcel Energy (Attachment C) accurate with the Commission's Orders in the TEP and IDP dockets?

Otter Tail has reviewed Attachment B for its filing requirements and believes it to be accurate with the Commission's Orders in the TEP and IDP dockets.

- ***If proposing changes to the TEP/IDP filing requirements, please provide red-line text of any proposed modifications to the filing requirements with citation and rationale.***

Otter Tail does not propose any changes.

3. ***Should the Commission discontinue the requirement to file Transportation Electrification Plans biennially on June 1 in Docket 17-879, and instead require the utilities to file based on amended IDP filing requirements incorporating TEP topics starting with the November 1, 2023, IDPs?***

Otter Tail agrees the June 1 biennial TEP filings should be discontinued and instead be included in the IDP filing starting on November 1, 2023.

4. ***Are there other issues or concerns related to this matter?***

Otter Tail has no other issues or concerns related to this matter.

III. CONCLUSION

Otter Tail appreciates the opportunity to work with Commission staff to create efficiencies in the TEP and IDP filing process. The Company looks forward continued engagement in this stakeholder process.

Dated: August 1, 2022

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ MICHAEL RIEWER

Michael Riewer

Manager, System Infrastructure & Reliability

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By: /s/ JASON GRENIER

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CERTIFICATE OF SERVICE

**RE: In the Matter of the Distribution System Planning for Otter Tail
Power Company
In the Matter of a Commission Inquiry into Electric Vehicle Charging
and Infrastructure
Docket Nos. E017/M-21-612 and E999/CI-17-879**

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
Comments**

Dated this **1st** day of **August, 2022**.

/s/ Stacy Wahlund
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[illegible]

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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_17-879_Official
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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Generic Notice	Residential Utilities Division	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_17-879_Official
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