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April 11, 2022



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

**PUBLIC DOCUMENT – NOT PUBLIC
(OR PRIVILEGED) DATA HAS BEEN EXCISED**

**RE: In the Matter of Otter Tail Power Company’s Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate, Rate Schedule 13.09
Docket No. E017/M-22-
Initial Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits its Petition to the Minnesota Public Utilities Commission (Commission) for approval of its Energy-Intensive, Trade-Exposed Rider Surcharge Rate under Otter Tail’s Rate Schedule 13.09.

This Petition contains information that is protected by the Minnesota Data Practices Act. That information has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to efforts by Otter Tail to protect the information from public disclosure. Otter Tail maintains this information as a trade secret based on its economic value from not being generally known and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use. For this reason, Otter Tail asks that the data be treated as non-public data pursuant to Minn. Stat. § 13.37, subd. 1(b). The enclosed are marked as **NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE** and **PUBLIC – NOT PUBLIC (OR PRIVILEGED) DATA HAS BEEN EXCISED**. The information designated as non-public herein concerns energy usage of specific customers. Docket No. E,G999/CI-12-1344 addresses the confidential, non-public nature of this data.

Otter Tail has electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, Subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources and the Office of Attorney General, Residential Utilities Division. A Summary of the filing has been served on all persons on Otter Tail’s general service list. A Certificate of Service is also enclosed.

Mr. Seuffert
April 11, 2022
Page 2

If you have any questions regarding this filing, please contact me at 218-739-8042 or at pfoster@otpc.com.

Sincerely,

/s/ PAULA FOSTER
Paula Foster
Supervisor, Regulatory Analysis
Regulatory Administration

sjw
Enclosures
By electronic filing
c: Service List

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

**In the Matter of Otter Tail Power
Company's Petition for Approval of the
Annual Update to its Energy-Intensive,
Trade-Exposed Rider Surcharge Rate,
Rate Schedule 13.09**

Docket No. E017/M-22-

SUMMARY OF FILING

On April 11, 2022, Otter Tail Power Company (Otter Tail or Company) filed a petition with the Minnesota Public Utilities Commission for approval of its renewal of customer eligibility, updated baseline and annual update to the Energy-Intensive, Trade-Exposed (EITE) Rider Surcharge Rate under Otter Tail's Rate Schedule 13.09.

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

**In the Matter of Otter Tail Power
Company's Petition for Approval of the
Annual Update to its Energy-Intensive,
Trade-Exposed Rider Surcharge Rate,
Rate Schedule 13.09**

**Docket No. E017/M-22-

PETITION**

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) submits this Petition to the Minnesota Public Utilities Commission (Commission) under Minn. Stat. § 216B.1696 (EITE Statute) for approval of its annual update (Update) to its Energy-Intensive, Trade-Exposed (EITE) Rider (EITE Rider) Surcharge Rate under Otter Tail's Rate Schedule 13.09.

This filing is Otter Tail's fourth update to the EITE Surcharge Rate and reflects the EITE Rider revenue requirements for the next proposed recovery period, December 1, 2022, through December 31, 2023. The update includes the tracker balance estimated for the end of the current recovery period to minimize the over-or-under-recovery of the EITE Rider costs. The proposed effective date of the updated EITE Surcharge Rate is December 1, 2022.

The revenue requirement for the recovery period upon which the rate was developed is \$971,165, which includes the projected tracker balance at the end of November 2022 of \$3,842 and a refund due to an increase in EITE-customer revenues of \$72,991. This update results in a change to the EITE Surcharge Rate from \$0.00039 per kWh currently in effect to \$0.00034 per kWh for the recovery period beginning December 1, 2022. For a residential customer using 1,000 kWh per month, the bill impact is a decrease of \$0.05 per month, which is \$0.60 annually.

Also, included in this filing is the 2021 annual report of sales to and revenue from Otter Tail's EITE-customers. This information is provided in Attachments 4 through 6.

II. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, Subp. 1, a one-paragraph summary of the filing accompanies this Petition.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, Subp. 3, the following information is provided.

A. Name, address, and telephone number of utility

(Minn. Rules 7829.1300, Subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8200

B. Name, address, and telephone number of utility attorney

(Minn. Rules 7829.1300, Subp. 3(B))

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8956

C. Date of filing and proposed effective date of rates

(Minn. Rules 7829.1300, Subp. 3(C))

The date of this filing is April 11, 2022. Otter Tail requests that the proposed EITE Surcharge Rate become effective December 1, 2022, or on the first day of the month following Commission approval, should its decision be thereafter.

D. Statutes controlling schedule for processing the filing

(Minn. Rules 7829.1300, Subp. 3(D))

Minn. Stat. § 216B.16 permits a utility to implement a proposed rate change after giving the Commission a 60-day notice. This filing is a “miscellaneous tariff filing” as defined by the Commission’s rules at Minn. Rules 7829.0100, Subp. 11. No determination of Otter Tail’s overall revenue requirement is necessary (or required

under the Statute). Minn. Rules 7829.1400, Subps. 1 and 4 permit comments in response to a miscellaneous tariff filing to be filed within 30 days and reply comments to be filed no later than 10 days thereafter. Minn. Stat. § 216B.1696 Subd. 2(c) provides that a final determination shall be made in an EITE proceeding within 90 days of a miscellaneous rate filing by the electric utility.

E. Title of utility employee responsible for filing

(Minn. Rules 7829.1300, Subp. 3(E))

Paula Foster
Supervisor, Regulatory Analysis
Regulatory Administration
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, Minnesota 56538-0496
(218) 739-8042

F. Impact on rates

(Minn. Rules 7829.1300, Subp 4(F))

The EITE Rider has no effect on Otter Tail's base rates. The additional information required under this Rule is included throughout the Petition.

G. Service List

(Minn. Rules 7829.0700)

Otter Tail requests that the following persons be placed on the Commission's official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail:

Paula Foster
Supervisor, Regulatory Analysis
Regulatory Administration
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8042
pfoster@otpc.com

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8956
cstephenson@otpc.com

H. Service on other parties

(Minn. Rules 7829.1300, Subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, Subp. 2, Otter Tail served a copy of this Petition on the Division of Energy Resources of the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, Subp. 1 was served on all parties on Otter Tail's general service list.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Background

Otter Tail's EITE Rider was established in Docket No. E017/M-17-257. The Commission approved the EITE discount for three EITE customers¹ in its November 17, 2017 Order in that proceeding. The discount for the three EITE customers commenced on December 1, 2017. The Commission approved Otter Tail's cost-recovery proposal, including its proposal to refund any increased revenues resulting from the EITE discount to EITE-paying customers in its May 29, 2018 Order. The first EITE Surcharge Rate went into effect June 1, 2018. The Commission approved the four-year renewal of the EITE discount for the three EITE customers in its April 22, 2021 Order in Docket No. E017/M-21-099. Otter Tail provides Table 1 with the subsequent filings and Commission approvals.

Table 1

Otter Tail Power Company Minnesota EITE Filing, Order, and Implementation Dates						
Description	Docket No.	Date Filed	Order Date	Eligibility/Discount Implementation Date	Surcharge Rate Implementation Date	Surcharge Rate Per kWh
Initial Filing	E017/M-17-257	April 3, 2017	November 17, 2017	December 1, 2017	N/A	N/A
Eligibility	E017/M-17-257	April 3, 2017	November 17, 2017	December 1, 2017	N/A	N/A
Discount	E017/M-17-257	December 18, 2017	May 29, 2018		June 1, 2018	\$0.00055
Cost Recovery						
First Update	E017/M-19-199	March 1, 2019	June 13, 2019	N/A	October 1, 2019	\$0.00038
Second Update	E017/M-20-338	March 2, 2020	May 22, 2020	N/A	October 1, 2020	\$0.00033
Third Update	E017/M-21-099	February 1, 2021	April 22, 2021	December 1, 2021	December 1, 2021	\$0.00039

¹ Cass Forest Products, Norbord, Inc., and PotlatchDeltic Corporation.

B. EITE Tracker

The EITE Tracker includes the following attachments:

1. Summary of Revenue Requirements

Attachment 1 is a summary of the proposed \$971,165 net revenue requirement calculated for the December 1, 2022, through December 31, 2023, recovery period. The total revenue requirement is \$1,041,371 before the following adjustments: a refund due to increased EITE-customer revenues of (\$72,991); carrying charge of (\$1,057); and the projected over-recovery of the current period of \$3,842. The proposed EITE Surcharge Rate for this update on the net revenue requirement of \$971,165 is \$0.00034 per kWh, a decrease of \$0.00005 per kWh from the current rate of \$0.00039 per kWh.

2. Tracker Balance

Otter Tail maintains a tracker account worksheet and accounting system to track and account for the revenue requirement and amount billed to eligible customers. When submitting annual filings, the tracker account is updated so that any over/under recovered amount at the end of the previous year is reflected in the EITE Rider adjustment for the upcoming year. This approach helps mitigate under/over recovery. The tracker summary balance is included in Attachment 2.

If the effective date of the updated EITE Surcharge Rate is more than 45 days later than December 1, 2022, Otter Tail respectfully requests the option to recalculate the rates in order to implement rates that recover the total revenue requirements for the recovery period.

3. Rate Design

Otter Tail uses the per kWh rate design approved in the previous Order. The rate design is shown in Attachment 3 and is equal to the total revenue requirement divided by projected kWh sales for the recovery period, not including Low Income Home Energy Assistance Program (LIHEAP) nor the EITE customers.

The proposed rate of \$0.00034 per kWh is based on the assumption that the surcharge rate will be in effect beginning December 1, 2022.

4. Revenue Requirements, Rate Application, and Impact

Otter Tail proposes that the EITE Surcharge Rate continue to be applicable to electric service under Otter Tail's retail rate schedules as defined in Rate Schedule 13.09. The charge will continue to be included as part of the Resource Adjustment line on customers' bills.

The total revenue requirement for the proposed recovery period, as shown on Line 9 in Attachment 1, is \$971,165.

5. 2021 Annual Sales to and Revenue from EITE Customers

As required by the Commission's Order point 6,² Otter Tail provides the 2021 annual sales to and revenue from EITE customers in Attachment 4 (Line No. 1 and Line No. 2, respectively). Column A provides the actual 2021 sales to and revenue from, and Column B provides the approved baseline kWh sales to the EITE customers. Line No. 7 provides the difference of 2021 weather normalized kWh sales, as derived in Attachment 6, compared to the approved baseline to arrive at an estimate of the total weather normalized revenue from the EITE customers compared to the approved baseline (Line No. 9).

Applying the 2021 weather normalization factor³ for the EITE customers results in slightly lower energy usage as a result of production operations of the plant. The revenue margin (Attachment 4, Line No. 12)⁴ is used to compute the approximate total additional weather normalized marginal revenue below the approved baseline (Attachment 4, Line No. 14) of about (\$49,359) for 2021.

² Minnesota Public Utilities Commission Order dated May 29, 2018, In the Matter of Otter Tail Power Company's Petition for Approval of an Energy-Intensive, Trade-Exposed Rate.

³ Otter Tail's weather normalization process utilizes the current year plus the prior 20 years of Otter Tail hourly weather data, monthly revenue, and monthly kWh data. A statistical regression procedure is used to determine weather normalization models for each of 40 different rate groups within the Minnesota jurisdiction. The EITE customers are part of rate groups 31 (changed from 41 in February 2019), 42, and 43.

⁴ Attachment 5 provides the Lost Margin calculation. This calculation was provided as Attachment 7 to Otter Tail's Initial Filing in Docket No. E017/ M-17-257 updated to reflect 2021 data where appropriate.

The total refund to EITE surcharge rate paying customers including carrying charges is approximately \$72,991. In accordance with Order Point 5, Otter Tail will refund any increased EITE-customer revenues from increased operations to EITE-surcharge rate paying customers after the four-year discount term in December 2025.

6. Customer Notification and Billing

Attachment 7 is the proposed notice to customers that will be included with customer bills in the month that the new EITE Surcharge Rate is implemented.

V. ENERGY-INTENSIVE, TRADE-EXPOSED RIDER RATE SCHEDULE

Otter Tail’s updated rate schedule Section 13.09 is provided in Attachment 8 to this Petition in both redline and clean versions.

VI. CONSIDERATION FOR NEXT YEAR’S FILING

Because the annual change in the EITE rate is small, as shown in Table 1, and to reduce administrative burden for all parties, Otter Tail requests approval to file its EITE update once every two years instead of annually, beginning with next year’s filing. Otter Tail will continue to calculate the rate change annually and, should material changes occur that necessitate an “off-year” update, Otter Tail will make that filing to address those changes.

VII. CONCLUSION

For the reasons set forth in this Petition, Otter Tail requests Commission approval of the updated revenue requirement included in this filing and to implement the associated updated EITE Surcharge Rate, Section 13.09, effective for usage on and after December 1, 2022. In addition, Otter Tail respectfully requests approval to file every two years after the 2023 filing.

Dated: April 11, 2022

Respectfully Submitted,

OTTER TAIL POWER COMPANY

By: /s/ PAULA FOSTER

Paula Foster

Supervisor, Regulatory Analysis

Regulatory Administration

Otter Tail Power Company

215 S. Cascade Street

Fergus Falls, MN 56537

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OTTER TAIL POWER COMPANY
EITE FILING ATTACHMENTS

Attachment 1	Summary of Revenue Requirements
Attachment 2	EITE Tracker Summary
Attachment 3	Rate Design
Attachment 4	2021 Annual Sales To and Revenue From EITE Customers – Summary
Attachment 5	Calculation of Marginal Revenue Percent
Attachment 6	2021 Annual Sales To and Revenue From EITE Customers – Detail
Attachment 7	Notice to Customers
Attachment 8	Energy-Intensive, Trade-Exposed Rider, Electric Rate Schedule 13.09

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider

Summary of Revenue Requirements
2022 Annual Filing

Line No.	Revenue Requirements	
1	Revenue Requirement (Dec 2022 - Dec 2023)	\$ 1,041,371
2		
3	Refund due to increased EITE-customer revenues	(72,991)
4		
5	Carrying (Credit)/Charge	(1,057)
6		
7	True-Up	3,842
8		
9	Net Revenue Requirement	<u>\$ 971,165</u>

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider
EITE Tracker Summary

Line No.	TRACKER SUMMARY Requirements Compared to Billed:	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	Dec21-Nov22
		January Forecast	February Forecast	March Forecast	April Forecast	May Forecast	June Forecast	July Forecast	August Forecast	September Forecast	October Forecast	November Forecast	Collection Period
1	EITE Customer Revenue Requirement	84,525	78,647	83,872	74,729	75,100	77,593	77,571	82,865	76,115	82,991	84,505	962,689
2	Refund due to increased EITE-customer Revenues												
3													
4	Net Revenue Requirement	84,525	78,647	83,872	74,729	75,100	77,593	77,571	82,865	76,115	82,991	84,505	962,689
5													
6	Billed (forecast \$ x rate)	101,303	92,634	91,758	82,887	78,353	77,242	79,558	78,119	73,497	77,084	89,226	1,002,749
7													0
8	Monthly Revenue Difference	(16,778)	(13,987)	(7,886)	(8,159)	(3,253)	351	(1,987)	4,746	2,618	5,907	(4,721)	(40,060)
9	Carrying Charge	278	179	96	50	1	(18)	(16)	(28)	(0)	15	51	864
10	Life-to-Date Revenue Requirement (Cumulative Difference)	29,885	16,076	8,287	178	(3,074)	(2,742)	(4,745)	(28)	2,590	8,512	3,842	
11													
12	Carrying Charge/Credit Calculation	179	96	50	1	(18)	(16)	(28)	(0)	15	51	23	
13	Cumulative Carrying Charge	26,676	26,772	26,821	26,822	26,804	26,788	26,759	26,759	26,774	26,825	26,848	
14	Carrying cost	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	
15													
16													
17	Forecasted Sales (kWh)	259,751,340	237,523,873	235,276,430	212,531,631	200,905,414	198,056,781	203,994,625	200,305,772	188,453,911	197,652,302	228,783,756	2,363,235,837

Approved by MN PUC April 22, 2021 E-017/M-21-99

SUMMARY		Dec 2021 - Nov 2022
Revenue requirements		\$963,497
Carrying charge		167
True-up		51,580
Total requirements		\$1,015,245
Dec 2021 - Nov 2022 projected kWh sales		2,619,644,379
Rate per kWh		\$0.00039

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider
EITE Tracker Summary

Line No.	TRACKER SUMMARY Requirements Compared to Billed:	2022	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	Dec22-Dec23
		December Forecast	January Forecast	February Forecast	March Forecast	April Forecast	May Forecast	June Forecast	July Forecast	August Forecast	September Forecast	October Forecast	November Forecast	December Forecast	YE Forecast	Collection Period
1	EITE Customer Revenue Requirement	84,870	79,280	78,501	83,716	74,589	74,960	77,447	77,426	82,710	75,972	82,837	84,349	84,714	956,501	1,041,371
2	Refund due to increased EITE-customer Revenues	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(5,615)	(67,377)	(72,991)
3																
4	Net Revenue Requirement	79,255	73,665	72,886	78,101	68,974	69,345	71,832	71,811	77,096	70,358	77,222	78,734	79,099	889,124	968,379
5																
6	Billed (forecast \$ x rate)	85,354	87,863	80,438	80,066	71,975	68,346	66,983	69,267	67,947	64,007	66,548	77,367	85,026	885,832	971,186
7																
8	Monthly Revenue Difference	(6,099)	(14,197)	(7,552)	(1,965)	(3,001)	1,000	4,849	2,545	9,148	6,351	10,674	1,367	(5,927)	3,292	(2,807)
9	Carrying Charge	23	(13)	(98)	(144)	(157)	(176)	(171)	(143)	(128)	(74)	(37)	27	35	(1,080)	(1,057)
10	Life-to-Date Revenue Requirement (Cumulative Difference)	(2,234)	(16,444)	(24,094)	(26,204)	(29,361)	(28,537)	(23,859)	(21,457)	(12,437)	(6,160)	4,477	5,871	(21)		
11																
12	Carrying Charge/Credit Calculation	(13)	(98)	(144)	(157)	(176)	(171)	(143)	(128)	(74)	(37)	27	35	(0)		
13	Cumulative Carrying Charge	26,835	26,737	26,593	26,436	26,260	26,089	25,947	25,818	25,744	25,707	25,734	25,769	25,769		
14	Carrying cost	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%	0.60%		
15																
16																
17	Forecasted Sales (kWh)	251,041,768	258,419,210	236,583,260	235,488,638	211,691,859	201,016,236	197,007,716	203,725,503	199,844,655	188,254,695	195,728,879	227,551,070	250,076,542	2,605,388,263	2,856,430,031

SUMMARY		Dec 2022 - Dec 2023
Net Revenue Requirement		\$968,379
Carrying Charge		(1,057)
True-up		3,842
Total Requirements		\$971,165
Dec 2022 - Dec 2023		2,856,430,031
Rate per kWh		\$0.00034

Line No.	Rate per kWh	
1		
2	Forecasted Retail Sales, all classes (Dec 2022 - Dec 2023)	2,856,430,031
3		
4	Minnesota 12-month Revenue Requirement	\$971,165
5		
6	Rate per kWh	\$0.00034
7		

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider
2021 Annual Sales to and Revenue from EITE Customers - Summary

A B

Line No.	EITE	2021 Total	Approved Baseline	
1	kWh Sales To	65,325,143	65,940,000	Attachment 6, Column M, Lines 29 and 32
2	Revenue From	\$ 4,719,507		Attachment 6, Column M, Line 18
3				
4	Average Cost per kWh	\$ 0.07225		A2 / A1
5				
6	Weather Normalized kWh Sales To	64,913,720		Attachment 6, Column M, Line 19
7	Over/(Under) Baseline	(1,026,280)		A6 - B1
8				
9	Total Revenue Over/(Under) Baseline	\$ (74,145)		A4 * A7
10				
11	Fixed Cost	33.43%		
12	Revenue Margin	66.57%		Attachment 5, Column J, Line 9
13				
14	Total Current Year Additional Revenue Margin	\$ (49,359)		A9 * A12
15	Prior Years Additional Revenue Margin	\$ 96,649		
16	Total Additional Revenue Margin	\$ 47,290		
17	Cummulative Carrying Charge/Credit	\$ 25,702		
18	Total Projected Due Back to EITE Surcharge Rate Paying Customers	\$ 72,991		

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider
Calculation of Marginal Revenue Percent

	A	B	C	D	E	F	G	H	I	J
Line No	EITE Customers	Average Overall Rate \$/kWh ¹ (F / E)	kW	Load Factor	kWh	Revenue	Fixed Costs (C * Fixed Costs)	Cost of Energy	Total Avoided Costs (G + H)	Lost Margin (F - I)
1	Norbord	[PROTECTED DATA BEGINS]								
2	Potlatch Corporation									
3	Cass Forest Products Inc									
4	Cass Forest Products									
5										
6	EITE Customer Total									
7	[PROTECTED DATA ENDS]									
8										
9	Components								Marginal Revenue Percent	66.57%
10	Cost of Energy	1 6638 cents/kWh								
11	Fixed Costs ²	[PROTECTED DATA BEGINS]	[PROTECTED DATA ENDS]							

¹ Based on Total Bill divided by kWh

² Represents the average fixed costs per kW for the three customers eligible for the EITE discount

Otter Tail Power Company
Minnesota Energy-Intensive, Trade-Exposed Rider
Annual Sales to and Revenue from EITE Customers - Detail

Line No.	Year>>	2021												M Total
		A January	B February	C March	D April	E May	F June	G July	H August	I September	J October	K November	L December	
	[PROTECTED DATA BEGINS...]													
	Norbord													
1	kWh Sales													
2	Revenue													
3	Percent above/(below) normal degree days													
4	Weather Normalized kWh - Rate Group 42													
	Potlatch													
5	kWh Sales													
6	Revenue													
7	Percent above/(below) normal degree days													
8	Weather Normalized kWh - Rate Group 43													
	Cass Forest Products													
9	kWh Sales													
10	Revenue													
11	Percent above/(below) normal degree days													
12	Weather Normalized kWh - Rate Group 43													
	Cass Forest Products													
13	kWh Sales													
14	Revenue													
15	Percent above/(below) normal degree days													
16	Weather Normalized kWh - Rate Group 41/31 (Moved from rate group 41 to 31 in Feb. 2019)													
	Total													
		...PROTECTED DATA ENDS												
17	kWh Sales To	5,407,642	5,659,349	5,417,377	6,116,278	5,344,129	5,412,028	5,549,851	5,072,536	5,462,542	5,070,674	5,388,218	5,424,519	65,325,143
18	Revenue From	\$ 369,586	\$ 395,550	\$ 391,649	\$ 417,685	\$ 372,178	\$ 374,019	\$ 386,468	\$ 386,318	\$ 412,730	\$ 379,088	\$ 413,351	\$ 420,881	\$ 4,719,507
19	Total Weather Normalized kWh	5,516,121	5,584,700	5,512,116	6,113,618	5,317,351	5,065,911	5,423,687	4,947,973	5,487,148	5,113,316	5,403,870	5,427,909	64,913,720
20	Total Baseline kWh	5,672,335	5,763,085	5,422,259	5,709,341	5,520,984	5,541,541	5,404,503	4,874,475	5,437,517	5,458,536	5,627,734	5,507,690	65,940,000

The Minnesota Public Utilities Commission approved our request to decrease our Energy-Intensive Trade-Exposed (EITE) Surcharge Rate. The approved rate of \$0.00032 per kWh will become effective December 1, 2022, for all classes of customers subject to the charge.

The EITE rider recovers costs associated with the State of Minnesota's energy policy to ensure competitive electric rates for EITE customers.

For more information, contact Customer Service at 800-257-4044 or visit otpc.com.

Attachment 8
Redline and Clean Versions of
Tariff Sheet MN 13.09
Energy-Intensive, Trade-Exposed (EITE) Rider



Fergus Falls, Minnesota

ENERGY-INTENSIVE, TRADE-EXPOSED (EITE) RIDER

DESCRIPTION	RATE CODE
EITE Surcharge	MEITE
EITE Exemption Adjustment	MEITA

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 pursuant to Minn. Stat. 216B.1696 Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer, except for those Customers with Low-Income Home Energy Assistance Program (LIHEAP) designation in the Company's billing system at the time of billing, as defined in Minn. Stat. 216B.16, Subd. 15, and the EITE Customers pursuant to Minn. Stat. 216B.1696, Subd.2(d). The exemptions are as follows:

EITE and LIHEAP Customers will be exempted from the Company's EITE charges (EITE Surcharge) pursuant to Minn. Stat. 216B.1696, Subd. 2(d) Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer. LIHEAP Customer designations will be reset each September 1. Residential Customers must annually reapply for such designation and be granted assistance from a LIHEAP to continue to be exempt from the EITE Surcharge.

EITE SURCHARGE AND EXEMPTION ADJUSTMENT: There shall be added to each non-exempt Customer's bill an EITE Surcharge, which shall be the EITE Surcharge Rate multiplied by the Customer's billing kWh for electric service. The EITE Surcharge will be included in the Resource Adjustment line item on the Customer's bill.

The EITE Surcharge shall not be applied to Customer Account(s) granted exemption by the Commission from EITE costs pursuant to Minn. Stat. 216B.1696, Subd. 2(d).

The EITE Surcharge Rate is \$0.0003~~49~~ per kWh.

R

DETERMINATION OF EITE SURCHARGE RATE: The EITE Surcharge Rate shall be the forecasted Recoverable EITE Tracker Balance divided by projected Minnesota non-exempt retail kWh sales for a designated 12-month recovery period. The EITE Surcharge Rate shall be rounded to the nearest \$0.00001. The EITE Surcharge Rate may be adjusted annually by approval of the Minnesota Public Utilities Commission (Commission). The Recoverable EITE Tracker Balance is determined as described below, starting with the Commission-accepted EITE Tracker account balance as of the end of the prior year.



Fergus Falls, Minnesota

ENERGY-INTENSIVE, TRADE-EXPOSED (EITE) RIDER

DESCRIPTION	RATE CODE
EITE Surcharge	MEITE
EITE Exemption Adjustment	MEITA

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 pursuant to Minn. Stat. 216B.1696 Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer, except for those Customers with Low-Income Home Energy Assistance Program (LIHEAP) designation in the Company's billing system at the time of billing, as defined in Minn. Stat. 216B.16, Subd. 15, and the EITE Customers pursuant to Minn. Stat. 216B.1696, Subd.2(d). The exemptions are as follows:

EITE and LIHEAP Customers will be exempted from the Company's EITE charges (EITE Surcharge) pursuant to Minn. Stat. 216B.1696, Subd. 2(d) Competitive Rate for Energy-Intensive, Trade-Exposed Electric Utility Customer. LIHEAP Customer designations will be reset each September 1. Residential Customers must annually reapply for such designation and be granted assistance from a LIHEAP to continue to be exempt from the EITE Surcharge.

EITE SURCHARGE AND EXEMPTION ADJUSTMENT: There shall be added to each non-exempt Customer's bill an EITE Surcharge, which shall be the EITE Surcharge Rate multiplied by the Customer's billing kWh for electric service. The EITE Surcharge will be included in the Resource Adjustment line item on the Customer's bill.

The EITE Surcharge shall not be applied to Customer Account(s) granted exemption by the Commission from EITE costs pursuant to Minn. Stat. 216B.1696, Subd. 2(d).

The EITE Surcharge Rate is \$0.00034 per kWh.

R

DETERMINATION OF EITE SURCHARGE RATE: The EITE Surcharge Rate shall be the forecasted Recoverable EITE Tracker Balance divided by projected Minnesota non-exempt retail kWh sales for a designated 12-month recovery period. The EITE Surcharge Rate shall be rounded to the nearest \$0.00001. The EITE Surcharge Rate may be adjusted annually by approval of the Minnesota Public Utilities Commission (Commission). The Recoverable EITE Tracker Balance is determined as described below, starting with the Commission-accepted EITE Tracker account balance as of the end of the prior year.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Update to its Energy-Intensive, Trade-Exposed Rider Surcharge Rate, Rate Schedule 13.09
Docket No. E017/M-22-**

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 **11th** day of **April, 2022**.

/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	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
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	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280 Saint Paul, MN 551012198	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125 Duluth, MN 55802	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Kavita	Maini	kmains@wi.rr.com	KM Energy Consulting, LLC	961 N Lost Woods Rd Oconomowoc, WI 53066	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Andrew	Moratzka	andrew.moratzka@stoel.com	Steel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Matthew	Olsen	molsen@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
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	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th PI E Ste 350 Saint Paul, MN 55101	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_Otter Tail Power Company_2022 EITE