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[www.otpc.com](http://www.otpc.com) (web site)

June 6, 2022



Mr. Will Seuffert  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7<sup>th</sup> 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-22-174  
Reply Comments**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its Reply Comments in the above-referenced matter.

Attachment 5 contains historical and/or projected usage information on individual customers (the "Protected Data"). The Protected Data is nonpublic data pursuant to Minn. Stat. § 13.02, subd. 9 due to the Commission's January 19, 2017 Order in Docket No. E,G999/CI-12-1344, which requires OTP to refrain from disclosing this data without the customers' consent. As nonpublic data, the Protected Data also constitutes not public data, as defined in Minn. Stat. § 13.02, subd. 8a and is protected data under Minn. R. 7829.0100, subp. 19a(A).

Otter Tail 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 me at 218-739-8042 or [pfoster@otpc.com](mailto:pfoster@otpc.com) if you have any questions regarding this filing.

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-22-174**

**REPLY COMMENTS**

**I. INTRODUCTION**

On April 11, 2022, Otter Tail Power Company (Otter Tail or Company) made its initial annual update filing to its Energy-Intensive, Trade-Exposed (EITE) Rider proposing an update to the Rate schedule 13.09 surcharge rate to be effective December 1, 2022. Otter Tail submits these Reply Comments in response to the Initial Comments filed by Minnesota Department of Commerce - Division of Energy Resources (Department). The Department recommends the Minnesota Public Utilities Commission (Commission) approve the Petition with modifications but reject Otter Tail's request to update the EITE on a biennial basis instead of the current annual basis. In addition to addressing the Department's proposed modifications in Reply Comments, Otter Tail also includes revised original Attachments 1-5 and an updated Customer Notice with these Reply Comments.

**II. OTTER TAIL RESPONSES**

The Department provided a seven-part analysis of Otter Tail's original Petition and summarized its analysis with five specific recommendations to the Commission. Otter Tail, in these comments, will respond to each of the recommendations made by the Department.

**A. Approve Otter Tail's Petition to use December 2022 through December 2023 for the current Petition and transition to a calendar year basis for all future Petitions, with the final year incorporating only the final 11 months of the EITE four-year period.**

The Department recommends approval of the Company's request to move to a calendar year for the EITE rate schedule, making the current collection period thirteen months instead of the usual twelve. The Department also clarifies that the additional month in the current year's rate cycle would result in an eleven-month rate cycle in the final rate year ending November 30, 2025, with the conclusion of the currently

approved EITE period. Otter Tail agrees with this clarification, and any additional recovery period would be requested in the 2025 EITE filing made by the Company.

**B. Approve Otter Tail's Proposed Revenue Requirement of \$970,403.**

The Department correctly identified an error in the original Revenue Requirement calculation and recommends the corrected Revenue Requirement be approved by the Commission. The correction of this error reduces the Revenue Requirement from the original \$971,165 to \$970,403, but the originally calculated rate of \$0.00034 remains the same. Corrected versions of original Attachments 1-5 are included as a part of these Reply Comments as Attachments 1-5.

**C. Approve Otter Tail's EITE Surcharge Rate of \$0.00034 for the period of December 2022 through December 2023.**

Following its analysis, the Department recommends the approval of a \$0.00034 EITE Surcharge rate. This rate includes the update to the Revenue Requirement and is calculated based upon the extended 13-month period.

**D. Require Otter Tail to correct the rate on its Customer Notice from \$0.00032 to \$0.00034.**

The Department, as a part of its review, discovered that the Customer Notice in the original Petition had the incorrect rate of \$0.00032 when the correct rate is \$0.00034. Otter Tail appreciates the Department bringing attention to this issue. A corrected version of the Customer Notice (original Attachment 7) is included with these Reply Comments as Attachment 6.

**E. Reject Otter Tail's Proposal to submit its EITE update biennially as it would be non-compliant with the Commission's May 29, 2018 Order.**

The Department does not support the approval of Otter Tail's request to file the EITE update every two years. The Department refers to the language of the May 29, 2018 Order in Docket No. E017/M-17-257, which states: "Otter Tail shall provide annual updates on the electric sales to and revenues from its EITE customers." While Otter Tail does not dispute the language in the 2018 Order, it does believe the May 2018 Order should be looked at in its entirety and the status of the current EITE surcharge process should be taken into account when considering this request. The Commission has the ability to update and change requirements for the EITE annual filings in its Orders when it finds it to be appropriate. The Company finds this filing to be the applicable venue to make a request to deviate from the annual update process beginning with its 2023 filing. As outlined below, Otter Tail believes the lack of variability in the rate and the cost associated with annual filings makes biennial

reporting in the best interest of Otter Tail and its customers, the Commission and its staff, and Department staff.

The May 2018 Order, referenced by the Department, laid out several terms for the ongoing requirements for the EITE filings and surcharge calculations, including the requirement that the current EITE process does not anticipate an annual refund to customers. The refund is set to be calculated at the end of a four-year period. However, as discussed on page five of the May 2018 Order, an annual update process was designed to “...alert the Commission to any unexpected increase in EITE-customer sales that may justify a more prompt refund of EITE surcharges.”<sup>1</sup> As described in the Order, the annual updates would act as a trigger to issue substantial refunds to customers more quickly than the standard process. Otter Tail understands the importance of the ability to refund customers significant amounts prior to the end of the four-year term, however this circumstance has not occurred in the past four update filings.

Otter Tail has filed an EITE annual update for each of the last four years. Below is a summary of the updated Surcharges approved since its original 2017 Petition.<sup>2</sup> Otter Tail does not see the variance between years as significant, and looking back, does not believe charging any of the annual rates for two consecutive years would have been detrimental to customers. To alleviate concerns of delayed customer refunds and rate swings, Otter Tail commits to making an annual filing in a non-filing year should the surcharge rate reach percent change of twenty. A 20 percent change in the currently proposed EITE rate of \$0.00034 would result in an average residential customer seeing a monthly increase or decrease of approximately seven cents.<sup>3</sup>

<b>Description</b>	<b>Docket</b>	<b>Surcharge per KWh</b>
First Update	E017/M-19-199	\$0.00038
Second Update	E017/M-20-338	\$0.00033
Third Update	E017/M-21-099	\$0.00039
Fourth Update (Current Filing)	E017/M-22-174	\$0.00034

Otter Tail continues to assert the cost savings of an annual filing are material enough to support the move to a biennial update. While the Department included the Company average costs for an annual update filing in its Initial Comments, the Department did not include the costs that the Company was invoiced by other parties<sup>4</sup> to complete the filing. Attachment 1 to IR MN-DOC-003 reflects an invoiced average

<sup>1</sup> 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.

<sup>2</sup> In the Matter of Otter Tail Power Company’s Petition for Approval of an Energy-Intensive, Trade-Exposed Rate, Docket No. E017/M-17-257.

<sup>3</sup> Based upon 1,000 kWh monthly usage.

<sup>4</sup> Commission and Department costs assessed to Otter Tail semi-annually.

annual cost of \$29,591.<sup>5</sup> For non-renewal years for customer eligibility, such as the 2019 and 2020 Dockets, costs assessed averaged \$5,224 annually. Including these non-renewal year invoiced costs makes the potential cost savings higher for a minimum average total of \$19,949<sup>6</sup> as the value of time of all parties that could be devoted to more material matters.

As stated in the original Petition, and expanded upon in these Reply Comments, Otter Tail would continue to monitor the EITE rate change annually and bring any material changes to the Commission in an off year of the two-year filing requirement should it be approved. Otter Tail respectfully requests the Commission approve its request to file the EITE update every two years, with the first biennial filing in 2023.

### **Additional Information**

Cass Forest Products recently informed Otter Tail that it is now doing business as Tymberline Wood Products. Pending additional information from Cass Forest Products (which remains a Minnesota company in good standing with the Minnesota Secretary of State) we have no information to suggest this customer fails to meet the criteria of an EITE customer. We will update the Commission if we receive such information suggesting otherwise.

## **III. CONCLUSION**

Otter Tail appreciates the opportunity to provide these Reply Comments in response to the comments and modifications presented by the Department regarding Otter Tail's 2022 Annual Update to its EITE Surcharge rate. Otter Tail supports the recommendations made by the Department to approve a 13-month proposed revenue requirement of \$970,403 for a surcharge of \$0.00034 for the period December 2022 to December 2023. Otter Tail also supports the correction of the Customer Notice to reflect the correct rate of \$0.00034, which is included as Attachment 6. As clarified in these Reply Comments, Otter Tail respectfully requests the Commission approve its initial request to file the updated EITE every two years with filings being made in 2023 and 2025.

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<sup>5</sup> See Attachment 7 to these Reply Comments for the Attachment 1 that was included in the response to Information Request MN-DOC-003.

<sup>6</sup> OTP average annual costs of \$14,725 + DOC/PUC average assessed costs from non-renewal years of \$5,224 = \$19,949.

Dated: June 6, 2022

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ PAULA FOSTER

Paula Foster

Supervisor, Regulatory Analysis

Regulatory Administration

Otter Tail Power Company

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**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	(73,726)
4		
5	Carrying (Credit)/Charge	(1,084)
6		
7	True-Up	3,842
8		
9	Net Revenue Requirement	<u>\$ 970,403</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	<b>Net Revenue Requirement</b>	<b>84,525</b>	<b>78,647</b>	<b>83,872</b>	<b>74,729</b>	<b>75,100</b>	<b>77,593</b>	<b>77,571</b>	<b>82,865</b>	<b>76,115</b>	<b>82,991</b>	<b>84,505</b>	<b>962,689</b>
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

<b>SUMMARY</b>		<b>Dec 2021 - Nov 2022</b>
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	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	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(5,671)	(68,055)	(73,726)	
3																	
4	Net Revenue Requirement	79,199	73,609	72,830	78,045	68,918	69,289	71,775	71,755	77,039	70,301	77,165	78,677	79,043	888,446	967,645	
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	(6,156)	(14,254)	(7,608)	(2,022)	(3,057)	943	4,793	2,488	9,092	6,295	10,618	1,310	(5,984)	2,614	(3,542)	
9	Carrying Charge	23	(14)	(99)	(145)	(158)	(177)	(173)	(145)	(131)	(78)	(40)	23	31	(1,107)	(1,084)	
10	Life-to-Date Revenue Requirement (Cumulative Difference)	(2,290)	(16,558)	(24,265)	(26,432)	(29,647)	(28,881)	(24,261)	(21,918)	(12,958)	(6,741)	3,837	5,170	(783)			
11																	
12	Carrying Charge/Credit Calculation	(14)	(99)	(145)	(158)	(177)	(173)	(145)	(131)	(78)	(40)	23	31	(5)			
13	Cumulative Carrying Charge	26,835	26,736	26,590	26,432	26,255	26,082	25,937	25,806	25,728	25,688	25,711	25,742	25,737			
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	

Dec 2022 -	
SUMMARY	
Net Revenue Requirement	\$967,645
Carrying Charge	(1,084)
True-up	3,842
Total Requirements	\$970,403
Dec 2022 - Dec 2023	2,856,430,031
Rate per kWh	\$0.00034

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

**Docket No. E017/M-22-174**  
**Attachment 3**  
**Page 1 of 1**

Line No.	Rate per kWh	
1		
2	Forecasted Retail Sales, all classes (Dec 2022 - Dec 2023)	2,856,430,031
3		
4	Minnesota 13-month Revenue Requirement	\$970,403
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	7.68%		
12	Revenue Margin	65.61%		Attachment 5, Column J, Line 9
13				
14	Total Current Year Additional Revenue Margin	\$ (48,646)		A9 * A12
15	Prior Years Additional Revenue Margin	\$ 96,649		
16	Total Additional Revenue Margin	\$ 48,003		
17	Cummulative Carrying Charge/Credit	\$ 25,723		
18	Total Projected Due Back to EITE Surcharge Rate Paying Customers	\$ 73,726		

**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 <sup>1</sup> (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										
10	Cost of Energy	1 6638 cents/kWh								Marginal Revenue Percent	65.61%
11	Fixed Costs <sup>2</sup>	[PROTECTED DATA BEGINS]	[PROTECTED DATA ENDS]								

<sup>1</sup> Based on Total Bill divided by kWh

<sup>2</sup> Represents the average fixed costs per kW for the three customers eligible for the EITE discount

The Minnesota Public Utilities Commission approved our request to decrease our Energy-Intensive Trade-Exposed (EITE) Surcharge Rate. The approved rate of \$0.00034 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](http://otpc.com).

Response to Information Request MN-DOC-003  
Page 1 of 2

OTTER TAIL POWER COMPANY  
Docket No: E017-M-22-174

Response to: MN Department of Commerce  
Analyst: Angie Skayer, John Kundert  
Date Received: April 26, 2022  
Date Due: May 06, 2022  
Date of Response: May 04, 2022  
Responding Witness: Stuart Tommerdahl, Manager, Regulatory Administration, 218 739-8279

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Information Request:

Topic: Energy-Intensive, Trade-Exposed Rider Annual Filing  
Reference(s): Filing page 7 - Proposal to Move to Biennial Filing

- a. Please quantify the administrative savings Otter Tail will receive filing its EITE biennially instead of annually. Please provide this in Excel format with all formulae and links intact.
- b. Has the Company performed a legal analysis to determine if this proposed procedural change is consistent with applicable Minnesota Statutes and Rules?
  - a. If so, please provide a copy of this analysis.
  - b. If not, please provide a statement to that effect.

Attachments: 1

Attachment 1 to IR MN-DOC-003.pdf

Response:

1. Annual labor costs associated with preparing and administering the EITE dockets have averaged approximately \$14,725 per year over the 2016–2021 time-frame.

Otter Tail also receives direct assessments from the PUC and DOC for their time spent on these dockets. Over the 2016-2021 timeframe, these costs were high when the initial rate and mechanism was developed in 2016 and 2017, and costs increased again in 2021 when the baseline was updated. Attachment 1 to IR MN-DOC-003 provides a summary of the annual amounts of both Otter Tail labor and Direct PUC and DOC Assessment costs.

Otter Tail advanced the idea of a potential biennial filing for those times when an eligibility determination is not needed, as a possible way to reduce regulatory work for all parties involved for a matter that historically has seen limited variability in rate impacts to customers. The proposed rate for this update of \$0.00034 per kWh is again in-line with the prior three rate updates as summarized below.

**Response to Information Request MN-DOC-003**  
**Page 2 of 2**

<b>Description</b>	<b>Docket</b>	<b>Surcharge Rate per kWh</b>
First Update	E017/M-19-199	\$0.00038
Second Update	E017/M-20-338	\$0.00033
Third Update	E017/M-21-099	\$0.00039
Fourth Update (This filing)	E017/M-22-174	\$0.00034

2. Otter Tail has not performed a comprehensive legal analysis with regard to its proposal. In making this filing OTP observed that nothing in the EITE statute or Minnesota Rules appeared to constrain the Commission from approving the proposed procedural change.

Otter Tail Power  
EITE Filings Labor and Direct Assessment Costs

Calendar Year	OTP Loaded Labor Costs	
2016	\$	11,195.31
2017	\$	23,304.23
2018	\$	13,023.16
2019	\$	10,367.21
2020	\$	16,708.08
2021	\$	13,754.45
Average	\$	14,725.41

Commission and DOC Direct Assessments on EITE Dockets

Direct Assessment Invoice Date	Docket	Labor & Expenses	
10/10/2016	16-533	\$	325.35
4/6/2017	16-533	\$	28,651.28
10/23/2017	17-257	\$	26,256.05
3/28/2018	17-257	\$	23,328.37
10/3/2018	17-257	\$	27,537.58
10/1/2019	19-199	\$	5,741.43
4/1/2020	19-199	\$	66.41
10/1/2020	20-338	\$	4,640.78
10/1/2021	21-99	\$	31,405.97



## **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-22-174**

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  
Reply Comments**

Dated this **6th** day of **June, 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	OFF_SL_22-174_M-22-174
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	OFF_SL_22-174_M-22-174
Brooke	Cooper	bcooper@allete.com	Minnesota Power	30 W Superior St  Duluth, MN 558022191	Electronic Service	No	OFF_SL_22-174_M-22-174
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St  Superior, WI 54880-4421	Electronic Service	No	OFF_SL_22-174_M-22-174
Sharon	Ferguson	sharon.ferguson@state.mn.us	Department of Commerce	85 7th Place E Ste 280  Saint Paul, MN 551012198	Electronic Service	No	OFF_SL_22-174_M-22-174
Paula	Foster	pfoster@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_22-174_M-22-174
Jessica	Fyhrie	jfyhrie@otpc.com	Otter Tail Power Company	PO Box 496  Fergus Falls, MN 56538-0496	Electronic Service	No	OFF_SL_22-174_M-22-174
Adam	Heinen	aheinen@dakotaelectric.com	Dakota Electric Association	4300 220th St W  Farmington, MN 55024	Electronic Service	No	OFF_SL_22-174_M-22-174
Nick	Kaneski	nick.kaneski@enbridge.com	Enbridge Energy Company, Inc.	11 East Superior St Ste 125  Duluth, MN 55802	Electronic Service	No	OFF_SL_22-174_M-22-174
James D.	Larson	james.larson@avantenergy.com	Avant Energy Services	220 S 6th St Ste 1300  Minneapolis, MN 55402	Electronic Service	No	OFF_SL_22-174_M-22-174

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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	No	OFF_SL_22-174_M-22-174
Will	Seuffert	Will.Seuffert@state.mn.us	Public Utilities Commission	121 7th Pl E Ste 350 Saint Paul, MN 55101	Electronic Service	No	OFF_SL_22-174_M-22-174
Cary	Stephenson	cStephenson@otpc.com	Otter Tail Power Company	215 South Cascade Street Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-174_M-22-174
Stuart	Tommerdahl	stommerdahl@otpc.com	Otter Tail Power Company	215 S Cascade St PO Box 496 Fergus Falls, MN 56537	Electronic Service	No	OFF_SL_22-174_M-22-174