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April 7, 2023

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

**Re: In the Matter of Otter Tail Power Company's Petition for Approval of the  
Annual Rate Update to its Transmission Cost Recovery Rider Annual  
Adjustment, Rate Schedule 13.05  
Docket No. E017/M-23  
Annual Update and Eligibility Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits its annual Transmission Cost Recovery Rider (TCRR) update to the Minnesota Public Utilities Commission (Commission) for the above-referenced matter. This update also includes a request for an eligibility determination for recovery of two new projects in the TCRR.

Otter Tail 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 Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at 218-739-8042 or [pfoster@otpc.com](mailto:pfoster@otpc.com).

Sincerely,

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

vjm  
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 Rate  
Update to its Transmission Cost Recovery  
Rider Annual Adjustment,  
Rate Schedule 13.05**

**Docket No. E017/M-23-**

**SUMMARY OF FILING**

Otter Tail Power Company (Otter Tail) has filed this Petition to the Minnesota Public Utilities Commission for approval of its Transmission Cost Recovery Rider Annual Update under Otter Tail's rate schedule 13.05. Pursuant to Minnesota Statutes § 216B.16, subd. 7b, Otter Tail is requesting a determination that costs associated with certain transmission projects requested in this Petition are eligible for rate recovery through Otter Tail's Transmission Cost Recovery Rider.

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

**In the Matter of Otter Tail Power Company's  
Petition for Approval of the Annual Rate  
Update to its Transmission Cost Recovery  
Rider Annual Adjustment,  
Rate Schedule 13.05**

**Docket No. E017/M-23-  
  
PETITION**

## I. EXECUTIVE SUMMARY

This filing for Otter Tail's Transmission Cost Recovery Rider (TCRR) includes the annual updated actual and forecasted costs and collections associated with two previously approved projects; regional transmission expenses and revenues recovered in the TCRR; and the addition of two new transmission projects. The new projects are summarized below.

## New Transmission Projects

- Oslo 115 kV Breaker Station and Oslo – Lake Ardoch 115 kV Line
  - Winger 230/115 kV Transformer
- A. Otter Tail proposes a rate implementation date of January 1, 2024.
- B. The Minnesota projected revenue requirement for the recovery period of January 1, 2024, to December 31, 2024, is \$1,696,071. Residential customers using 1,000 kWh monthly will see a bill reduction of approximately \$1.69.

## II. INTRODUCTION

Otter Tail Power Company hereby petitions the Minnesota Public Utilities Commission (Commission) for an Order approving the 2023 annual adjustment to its TCRR. The Petition is filed pursuant to Otter Tail's approved TCRR Rate Schedule 13.05, which was originally approved by the Commission on January 28, 2010, in Docket No. E017/M-09-881. This is the eighth update requested for the TCRR and includes updates to Midcontinent Independent System Operator (MISO) Schedule 26 and 26A Revenue and Expenses, carrying charge expense on the BSAT portion of the Tracker balance, and two new requested transmission projects.

Otter Tail requests a determination by the Commission that the two new transmission projects described below (the Projects) are eligible for cost recovery as of

January 1, 2024, through Otter Tail's TCRR. These transmission-related projects (1) increase the capacity of the transmission system; (2) enhance regional reliability; (3) facilitate the interconnection of generating facilities that satisfy the Minnesota Renewable Energy Objectives or some combination thereof. This Petition is made pursuant to Minn. Stat. § 216B.16 subd.7b (the TCRR Statute).

This update incorporates the inclusion of the Oslo 115 kV Breaker Station, Oslo – Lake Ardoch 115 kV line and the Winger 230/115 kV Transformer #2, all of which were approved through MISO Appendix A as part of project 4232 in 2019 to support the transmission system in northwest Minnesota. Further information about these projects is included below within Section E, Revenue requirement and rate impact.

The net revenue requirement for January 2024 through December 2024, upon which rates are developed, is \$1,696,071. The impact of the change from current rates to those proposed in this update for a residential customer using 1,000 kWh per month is a decrease of \$1.69 per month. For a Large General Service (LGS) customer using 485 kW, the bill impact of this update is a decrease of \$281.30 per month. The primary cause for the decrease in rates is the discontinuation of the carrying charge related to the BSAT projects that was approved in the November 10, 2020, Order in Docket No. E017/M-18-748.

### **III. SUMMARY OF FILING**

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

### **IV. GENERAL FILING INFORMATION**

Pursuant to Minn. Rule 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  
cstephenson@otpc.com

**C. Date of filing and proposed effective date of rates**

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

The date of this filing is April 7, 2023. Otter Tail proposes the TCRR rates become effective January 1, 2024, 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 proposed annual adjustment to Otter Tail's TCRR filing falls under the definition of a "miscellaneous tariff filing" under Minn. Rules 7829.0100, Subp. 11, with Minn. Rules 7829.1400 allowing initial comments within 30 days of filing and replies no more than 10 days thereafter.

**E. Title of utility employee responsible for filing**

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

Paula Foster  
Supervisor, Regulatory Analysis, Regulatory Economics  
Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
(218) 739-8042

**F. Impact on rates**

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

The TCRR has no effect on Otter Tail's current 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 people on behalf of Otter Tail:

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
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Fergus Falls, MN, 56538-0496  
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Regulatory Filing Coordinator  
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## **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 has served a copy of this Petition on the Office of Energy Security of the Department of Commerce and the Antitrust & 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.

# **V. DESCRIPTION AND PURPOSE OF FILING**

## **A. Background**

Minn. Stat. §216B.16, Subd. 7b(a) allows the Commission to approve a tariff mechanism, which provides for the automatic annual adjustment of charges that recover the Minnesota jurisdictional costs of new transmission facilities not included in base rates. Minn. Stat. §216B.1645 states that the Commission may approve a rate schedule that provides for the automatic adjustment of charges to recover prudently incurred investments, expenses, or costs associated with facilities constructed to satisfy the renewable energy objectives and standards set forth in Minn. Stat. §216B.1691, including those made to transmit the electricity generated from renewable generating facilities to Minnesota retail customers. The

information provided in this Petition is submitted in accordance with the statutes noted above.

The Commission's Order originally approving Otter Tail's TCRR was issued January 28, 2010, in Docket No. E017/M-09-881. The table below lists the TCRR history of previously filed annual updates.

TCRR - History			
TCRR History	Case Number	Commission Approved	Effective Date
Initial TCRR Rate and Mechanism	M-09-881	January 28, 2010	February 1, 2010
First Update	M-10-1061	March 26, 2012	April 1, 2012
Second Update	M-13-103	June 24, 2014	No rate change
Third Update	M-14-375	February 18, 2015	March 1, 2015
Fourth Update	M-15-874	March 9, 2016	April 1, 2016
Fifth Update	M-16-374	November 10, 2020	January 1, 2021
Sixth Update	M-18-748	November 10, 2020	January 1, 2021
Seventh Update	M-21- 811	July 12, 2021	January 1, 2022
Eighth Update	M-23-TCR		

In this Petition, Otter Tail is seeking to implement new rates based on updated investment, expense, and revenue collections that have occurred in the TCRR since the last update and as accounted for in accordance with the framework that has been ordered by the Commission in Otter Tail's prior TCRR Dockets.

## **B. Revenue requirement and rate impact**

Attachment 2 is a summary of the proposed \$1,696,071 TCRR revenue requirement that has been calculated for the recovery period of January 1, 2024, through December 31, 2024.

If the effective date of the updated TCRR rates is more than 45 days later than January 1, 2024, Otter Tail respectfully requests the option to recalculate the rate in order to implement a rate that forecasts the tracker balance as close to zero as possible at the end of the recovery period.

This Petition includes the impact of the following items on its revenue requirement:

1. Project Information: Actual revenue and expenses have been incorporated where applicable through February 2023. Projected investment, expense, and recovery information has also been updated for the proposed recovery period.
2. MISO data: MISO revenues and expenses have been updated with actual information through February 2023. Forecasted information has been

updated from March 2023 through December 2024 based on January 2023 data available on the MISO website.

3. Return on Rate Base & Allocation Factors: Otter Tail utilizes the return on rate base and its class and demand allocation factors to reflect what was decided upon during rate case deliberations on November 4, 2021, in Otter Tail's general rate case (Docket No. E017/GR-20-719).

Otter Tail proposes that the TCRR continue to be applicable to electric service under all of Otter Tail's retail rate schedules. The charge is included, for administrative purposes, as part of the Resource Adjustment line on customer bills. The proposed rates under the existing rate design are as follows:

<u>Class</u>	<u>¢ / kWh</u>	<u>\$ / kW</u>
Large General Service	N/A	\$0.321
Controlled Service	0.016¢	N/A
Lighting	0.100¢	N/A
All other service	0.093¢	N/A

The following table shows the estimated monthly rate impact (in this case, a rate reduction), by retail customer class:

<b>Rate Impact</b>								
	<b>kWh</b>	<b>kW</b>	<b>Customers</b>	<b>Average kW/kWh</b>	<b>Current Rate</b>	<b>Proposed Rate</b>	<b>Change in Rate</b>	<b>Bill Impact</b>
Large General Service		228,560	471	485	0.905	\$ 0.321	(0.580)	(281.30)
Controlled Service	12,522,245		14,489	864	0.050	¢ 0.016	(0.033)	(0.29)
Lighting	566,500		635	892	0.269	¢ 0.100	(0.169)	(1.51)
All Other Service	70,051,646		62,921	1,113	0.262	¢ 0.093	(0.169)	(1.88)

The above rates assume they will be in effect from January 1, 2024, to December 31, 2024.

### **C. Cost recovery methodology**

Attachments 1-4 of this Petition are, respectively, the Revenue, Revenue Requirements Summary, Rate Design, and Tracker Summary calculations used for Otter Tail's proposed TCRR rate update.

Attachments 7 & 8 provide the revenue requirement calculations for each of the new transmission projects identified in this filing. These calculations have been made in compliance with all the Commission's previous Orders regarding Otter Tail's TCRR.



Further details of key elements of the revenue requirement calculations are included below:

1. Carrying Charge: Per the Order in Docket No. E017/M-18-748 the Commission authorized a carrying charge from order date, November 10, 2020, at the authorized rate of Otter Tail's short-term debt, only for the additional tracker balance directly related to the over-collection resulting from the inclusion of the BSAT projects by the Commission in the 2015 general rate case order.<sup>1</sup> The monthly carrying charge and cumulative carrying charge can be seen in Attachment 4, lines 32 and 33. No other carrying charge is calculated per the Order in Docket No. E017/M-13-103. This carrying charge stopped accumulating after December 2022 and does not add to the revenue requirement in this filing.
2. Rate base section: This section provides details on the amount of plant in service, accumulated depreciation, construction work in progress (CWIP) (if applicable), accumulated deferred taxes, and a 13-month average rate base calculation for the projects included in the TCRR. Otter Tail has removed actual and forecasted internal costs in the TCRR, as Ordered by the Commission in Docket No. E017/M-13-103.
3. Proration of Federal Accumulated Deferred Income Taxes (ADIT) - As actuals are posted each month, the proration factor is eliminated, and the forecasted prorated Federal ADIT amounts are replaced with actual ADIT balances. Any difference that occurs between actual and prorated forecast amounts are incorporated into the true-up for the next collection period. Attachment 15 details the impact of the ADIT proration on the revenue requirement for the proposed recovery period. As seen in Attachment 15, line 20, adherence to this IRS rule results in a decrease of \$159 to the revenue requirement for the proposed recovery period due to the lower ADIT balance as a result of the proration.

Once the projects are in service, Otter Tail will include the proration of Federal ADIT balances to preserve the effect of the application of the proration methodology for the true-up period. This calculation methodology is necessary in order to comply with Section 1.167(l)-

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<sup>1</sup> Otter Tail used the short-term debt (1.77%) approved during rate case deliberations on November 4, 2021, for July 2021 and forward.

l(h)(6)(ii) of the IRS regulations and to avoid a tax normalization violation.<sup>2</sup>

4. Expense section: The expenses applicable to a project are listed and include operating costs, property taxes, depreciation, and income taxes.
5. Revenue requirements section: This section shows the components of the revenue requirements, including expenses and return on investment, and any credits to the revenue requirement for monies received for use of Otter Tail facilities by wholesale customers.
6. Return on investment (cost of capital): Otter Tail uses the cost of capital from its most recent general rate case.<sup>3</sup>
7. Depreciation expense: Depreciation expense is calculated using the Company's current composite depreciation rates.
8. Property taxes: The property tax calculation is based on Otter Tail's composite tax rate for the jurisdiction in which the transmission facilities are located and is calculated in accordance with the procedures specified by that state. Otter Tail included a rate base reduction for the property taxes to recognize the time value of money. In Otter Tail's most recent rate case (Docket No. E017/GR-20-719), it was determined that the relative amount of rate base reduction was equivalent to 77 percent of property tax expense.<sup>4</sup> This reduction can be seen on Line 24 in Attachments 5-8.
9. Operation and Maintenance (O&M) expense: Annual O&M expense of transmission lines includes costs related to line patrol and inspections, vegetation management, small repair items, storm restoration, and supervision of this work. Scheduled transmission line patrols are typically done annually on high voltage transmission lines (100 kV and above). Unscheduled patrols are completed for line sections with unexplained interruptions. Vegetation management of new lines is typically limited during the first five years since Otter Tail's construction standard is to remove as many trees as possible within a specified easement area prior

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<sup>2</sup> See Treas. Reg. SS 1.167(l)-1(h)(6)(ii).

<sup>3</sup> Docket No. E017/GR-20-719.

<sup>4</sup> Jurisdictional Cost of Service Study – Cash Working Capital Calculation by the Application of Lead Lag Factors, Page19-1 Property Taxes Operating Expense / Net Revenue Lag Dollars  $([\$5.9\text{M}] / \$7.7\text{M} = [77] \text{ percent})$ .

to construction. After five years, vegetation management is completed based on information gathered during line patrols. The O&M costs do not include internal labor costs as they were disallowed for current TCRR recovery in the Order issued by the Commission in Docket No. E017/M-13-103.

10. MISO Schedule 26 and 26A expenses: Schedule 26 and Schedule 26A costs for the recovery period appear on lines 10 and 11 of the Tracker Account (Attachment 4) and are shown separately in Attachment 9. These represent Otter Tail's retail share of the costs for projects that qualify for regional cost allocation under MISO's Open Access Transmission, Energy and Operating Reserve Markets Tariff (MISO Tariff).
11. MISO Schedule 26 and 26A revenues: Schedule 26 and 26A revenues for the recovery period appear on lines 15 and 17 of the Tracker Account Summary (Attachment 4) and are shown separately on Attachments 10 (Schedule 26) and Attachment 11 (Schedule 26A). These revenues reflect Otter Tail's share of the revenues derived for Otter Tail's investments in projects included in Otter Tail's TCRR that qualify for regional cost allocation through MISO's Tariff including revenues associated with project expenses disallowed for recovery in the TCRR per the Commission's Order in Docket No. E017/M-13-103.
12. MISO Schedules 37 and 38 revenues: Included in this TCRR rate update calculation are two revenue credits that reflect revenues received from MISO pursuant to Schedules 37 and 38 of the MISO tariff. The Schedule 37 revenues represent Otter Tail's portion of contributions required from American Transmission Systems Inc. (ATSI) for Otter Tail's transmission investments that were eligible for regional cost allocation while ATSI was still a member of MISO. ATSI withdrew from MISO on June 1, 2011, to integrate with PJM. The Schedule 38 revenues represent Otter Tail's portion of revenues from Duke-Ohio (DEO) and Duke-Kentucky (DEK) that departed MISO on December 31, 2011. ATSI, DEO, and DEK have an ongoing obligation to pay for transmission projects approved by MISO that were eligible for regional cost allocation when these companies were members of MISO.

MISO periodically publishes forecasted Schedule 26 and 26A revenues. Embedded in those forecasts are the Schedule 37 and Schedule 38 revenue credits. In compliance with the Commission's Order in Docket No. E017/M-13-103, Otter Tail has carved out a portion of the MISO Schedule 26 forecast revenue and identified that revenue as Schedule 37 or Schedule 38 revenue. Attachment 10, page 1, line 1, shows total actual Schedule 26 revenues for January 2022 through February 2023. Actual Schedule 37 and 38 revenues received by Otter Tail are reported through February 2023 on separate lines. The total MISO forecast for Schedule 26 revenues is shown on line 1 for March 2023 through December 2024. Embedded in these MISO forecasts are estimated revenues for ATSI, DEO and DEK. Line 2 reflects a revised Schedule 26 revenue forecast, carving out an estimated amount of revenue associated with ATSI, DEO and DEK, and reflecting that forecast revenue in the corresponding section for Schedule 37 and Schedule 38 lines. The total of forecasted lines 2, 23, and 24 equal the total MISO forecast reflected on line 1 for March of 2023 through December 2024.

13. Wholesale Revenue Credit: Attachment 13, page 1 of 1 shows the calculation of the wholesale revenue credit percentages from MISO Attachment O data for the respective calendar years. Most of these revenue credits are attributable to the wholesale use of existing transmission system assets included in base rates. A credit (calculated at the applicable annual wholesale percentage times the project's revenue requirement) is included as a reduction in the revenue requirement calculation. The wholesale revenue credit is shown on Attachment 13, line 7.
14. MISO Multi-Value Project Auction Revenue Rights: The Multi-Value Project Auction Revenue Rights (MVP ARR) credit shown on Attachment 12, page 1, is derived from the increased transmission capacity attributable to MVP projects placed in service within the MISO footprint. The value of these MVP ARRs is determined during MISO's annual Financial Transmission Rights auction process.

The revenues are distributed monthly to Asset Owners who pay for the MVP projects through MISO settlements, allocated in a manner similar to the allocation of Schedule 26A expenses. The revenue is included in the

TCRR based on Minnesota's jurisdictional share. As stated earlier, this revenue is reflected as a credit in the rider (Attachment 2, line 12, and Attachment 4, line 18) in compliance with the Commission's Order in Docket No. E017/M-14-375.

Otter Tail used the 2022 actual MVP ARR revenues to project future distributions from MISO of \$4,309 per month (Total System) as found in Attachment 12. These are the best estimates available at this time and, as with all other revenues and expenses, Otter Tail will true up these amounts to actuals in the next TCRR update.

15. MISO Return on Equity (ROE) Complaint. On November 12, 2013, and February 12, 2015, two groups of industrial customers and other stakeholders filed complaints at FERC seeking to reduce the ROE component of the transmission rates that MISO Transmission Owners (TO), including Otter Tail, may collect under the MISO Tariff. The two groups of complainants sought to reduce the, then current, ROE of 12.38 percent. FERC rulings on the matter include, September 28, 2016, and November 21, 2019 (Opinion No. 569),<sup>5</sup> May 21, 2020 (Opinion 569-A), and November 19, 2020 (Opinion 569-B). Both ROE complaint cases remain pending at the D.C. Circuit Court of Appeals. In February of 2022, MISO completed the ROE resettlement process for Opinions 569, 569-A, and 569-B.

Because Otter Tail uses a forward-looking rate formula in MISO, it makes an annual true-up filing with MISO. The true-up is generally calculated by determining the difference between the projected revenue requirement used in developing the rates for billing and the actual revenue requirements and billings based on actual operating results. Otter Tail includes the impacts of the 2021 refunds/surcharges within this filing in Attachments 9, 10, and 11.

#### **D. Projects previously approved for recovery in Otter Tail's TCRR**

Two projects previously approved in the MN TCR Rider are included for recovery in this Annual Update. These projects are the Erie Substation and Hoot Lake Transformer. Otter Tail rolled the previously approved Lake Norden

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<sup>5</sup>[169 FERC ¶ 61,129 \(2019\)](#).

Transmission Project Phase I and II, Rugby 41.6 kV Breaker Station, and Granville Junction Breaker Station into rates effective July 1, 2022, in Otter Tail's most recent general rate case (Docket No. E017/GR-20-719).

**E. New transmission projects requested for inclusion in the TCRR update**

This Petition is requesting a determination by the Minnesota Public Utilities Commission (Commission) that two transmission investments described below (the Projects) are eligible for cost recovery as of January 2024 through Otter Tail's TCRR. These transmission-related investments (1) increase the capacity of the transmission system; (2) enhance regional reliability; (3) facilitate the interconnection of generating facilities that satisfy the Minnesota Renewable Energy Objectives or some combination thereof.

Paragraphs (a)(1) and (a)(2) of the TCRR Statute provide the criteria for determining eligibility of the Projects:

a) Notwithstanding any other provision of this chapter, the commission may approve a tariff mechanism for the automatic annual adjustment of charges for the Minnesota jurisdictional costs net of associated revenues of:

1) new transmission facilities that have been separately filed and reviewed and approved by the commission under section 216B.243 or new transmission or distribution facilities that are certified as a priority project or deemed to be a priority transmission project under section 216B.2425;

2) new transmission facilities approved by the regulatory commission of the state in which the new transmission facilities are to be constructed, to the extent approval is required by the laws of that state, and determined by the Midcontinent Independent System Operator to benefit the utility or integrated transmission system;

The new projects noted below are eligible under paragraph (a)(1).<sup>6</sup>

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<sup>6</sup> Both projects are listed as needed projects in the Northwest Zone in the 2019 and 2021 Biennial Transmission Project Reports.

## **Northwest Minnesota Transmission System**

The Northwest Minnesota transmission system is an extensive network of 115 kV transmission lines with 230 kV sources at Drayton (North Dakota),

Grand Forks (North Dakota), and Winger (Minnesota). Transmission planning studies have identified that an overload of the Winger 230/115 kV transformer can occur if there is an outage that disconnects one of the other 230 kV sources to the Northwest Minnesota transmission system. Likewise, an outage of the existing Winger 230/115 kV transformer can also result in loading and voltage concerns not only in Northwest Minnesota, but also on the 115 kV transmission system east of Winger (towards Bemidji, Minnesota). Furthermore, studies have also shown that an even greater amount of low voltage concerns can occur throughout a larger area of Northwest Minnesota if there is a prior outage of an existing transmission facility followed by the unplanned outage of another facility making it difficult to perform planned maintenance of the existing transmission facilities.

Otter Tail and Minnkota Power Cooperative (MPC) both serve load in Northwest Minnesota that has shown to be increasing over the past decade. As a result, Otter Tail and MPC have been closely monitoring the load growth in Northwest Minnesota to ensure that the system continues to reliably serve customers, especially during winter peak conditions when the transmission system in this area experiences its highest loads and lowest voltages. Through the course of coordinated transmission planning studies, Otter Tail and MPC reviewed past load patterns as a basis for forecasting future loads within this area and developed a coordinated plan for the transmission system in northwest Minnesota that has been underway over the past few years as load has continued to grow. The current plan includes the following projects with their corresponding in-service dates (and projected in-service dates for future projects):

#	Description	Responsible Party	Year Completed (or Forecasted)
1A	115 kV Capacitor Bank at Donaldson, MN	Otter Tail	2019
1B	115 kV Capacitor Bank at Thief River Falls, MN	MPC	2019
2A	Undervoltage Load Shedding (UVLS) at Donaldson, Plummer and Crookston	Otter Tail	2020
2B	Undervoltage Load Shedding (UVLS) at Thief River Falls	MPC	2020
3A	Replace 115 kV switches at Plummer Substation	Otter Tail	2022
3B	Replace 115 kV switches at Oslo Town Substation	Otter Tail	2022
4	Add second 230/115 kV Transformer at Winger	Otter Tail	<b>2023</b>
5A	New Lake Ardoch 230/115 kV Substation	MPC	<b>2024</b>
5B	New Lake Ardoch – Oslo 115 kV Line (7-miles)	Otter Tail	<b>2024</b>
5C	New Oslo 115 kV Switching Station	Otter Tail	<b>2024</b>
6	New Winger – Plummer 115 kV Line #2	Otter Tail / MPC	2028+

Transmission planning studies have indicated that it is necessary for Otter Tail and MPC to move forward with the next steps of a phased transmission plan in order to maintain reliability of the transmission system in Northwest Minnesota. As shown as the fourth and fifth steps in the table above, Otter Tail and MPC are moving forward with the installation of a second Winger 230/115 kV transformer, Lake Ardoch 230/115 kV Substation, Lake Ardoch to Oslo 115 kV line and an, Oslo 115 kV switching station, as described in more detail below.

### **115 kV Oslo Breaker Station and Oslo - Lake Ardoch Line - Attachment 7**

Otter Tail and MPC are coordinating on a joint project to establish a new 230 kV source on the western side of the Northwest Minnesota transmission system. As part of this joint project, MPC is constructing a new Lake Ardoch 230/115 kV Substation just east of Ardoch, North Dakota, that will tap the existing Drayton to Prairie 230 kV line while Otter Tail will extend a new 115 kV line east from this new substation a distance of approximately seven miles to a new Oslo 115 kV breaker station just west of Oslo, Minnesota.

Transmission planning studies have shown that the new Lake Ardoch 230/115 kV Substation, Oslo 115 kV Breaker Station, and the associated 115 kV line between these new substations will maintain the reliability of the transmission system for an outage of the Winger source and offer a more resilient system capable of meeting voltage criteria following an unplanned outage during a prior outage condition. Otter Tail and MPC have coordinated this project with MISO and received MISO approval for the Lake Ardoch 230/115 kV Substation, Oslo 115 kV



Breaker Station and Lake Ardoch to Oslo 115 kV line during MISO's 2019 Transmission Expansion Plan (MTEP19).<sup>7</sup>

Otter Tail began permitting, land acquisition, engineering and design for its portion of this project in late 2022. In addition, Otter Tail is planning to start material procurement in the second quarter of 2023 in order for the entire project to be completed in late 2024. Permitting and land acquisition activities are only required in North Dakota given that the new facilities being added as part of this project are geographically located in North Dakota.

Otter Tail's estimate of the Lake Ardoch to Oslo 115 kV Project and Oslo 115 kV Breaker Station is approximately \$6.6 million (OTP Total) / \$3.3 million (OTP MN). This project was approved by the North Dakota Public Service Commission in Docket Number PU-22-335 on December 14, 2022.

### **Winger 230/115 kV Transformer – Attachment 8**

The second Winger 230/115 kV transformer creates a parallel 230 kV delivery at Winger, which not only addresses the overload concerns on the existing 230/115 kV transformer but also addresses the reliability concerns (i.e. loading and voltage) involving an outage of the existing transformer. Otter Tail and MPC coordinated these transmission plans with MISO and received MISO approval for the Winger 230/115 kV Transformer 2 project through MISO's 2019 Transmission Expansion Plan (MTEP19), which was approved in December 2019.<sup>8</sup>

The Winger Substation is co-owned between Otter Tail and MPC, with both parties owning discrete facilities within the substation. To accommodate the addition of a second 230/115 kV transformer at Winger, Otter Tail will install the second transformer and expand the 115 kV bus while MPC will be responsible for expanding the 230 kV bus. Otter Tail started engineering and design during 2022 and plans to complete installation of the transformer by the end of 2023.

Otter Tail's portion of the Winger 230/115 kV Transformer 2 project is estimated to cost \$4.8 million (OTP Total) / \$2.4 million (OTP MN) and is planned to be completed by the end of 2023. This project was approved by the North Dakota Public Service Commission in Docket Number PU-20-383 on November 18, 2020.

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<sup>7</sup> See Project Number 4232 in Appendix A of MISO's 2019 Transmission Expansion Plan, available at: <https://www.misoenergy.org/planning/planning/previous-mtep-reports/#t=10&p=0&s=FileName&sd=desc>.

<sup>8</sup> See Project Number 4232 in Appendix A of MISO's 2019 Transmission Expansion Plan, available at: <https://www.misoenergy.org/planning/planning/previous-mtep-reports/#t=10&p=0&s=FileName&sd=desc>.

#### **F. Allocations and rate design**

Otter Tail uses the approved transmission demand allocation factor, D2, from its most recent general rate case (Docket No. E017/GR-20-719) to allocate total revenue requirements to jurisdictions (Minnesota, 49.814 percent) and rate classes. The rate design uses a demand-only billing rate for the Large General Service Class (LGS) and an energy-only billing rate (cents/kWh) for all other customers. The rate design detail is included in Attachment 3.

In the Commission's Order issued March 26, 2012, in Docket No. E017/M-10-1061, the Commission requested an analysis of the impact of a "percentage of revenue" rate design among and within its customer classes. The analysis of a percent of revenue rate design and a comparison to the current rate design for an average month is included in Attachment 3.

#### **G. Transmission Cost Recovery Rider rate schedule**

A redline and non-redline version of Otter Tail's proposed Section 13.05 TCRR Rate Schedule is included in Attachment 16 to this Petition.

#### **H. Revisions to other rate schedules**

There are no changes to any other rate schedules.

#### **I. Notice to customers**

Attachment 17 is a proposed notice to customers that will be included with customer bills in the month that the new TCRR rates are implemented.

### **VI. CONCLUSION**

Otter Tail respectfully requests that the Commission approve Otter Tail's request for an eligibility determination of the two new projects being proposed for recovery in the TCRR and approve the updated revenue requirement and associated rates as set forth in this Annual Update filing to be in effect for bills rendered on and after January 1, 2024.

Dated: April 7, 2023

Respectfully Submitted,

OTTER TAIL POWER COMPANY

/s/ PAULA FOSTER

Paula Foster

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OTTER TAIL POWER COMPANY  
TRANSMISSION COST RECOVERY RIDER FILING ATTACHMENTS

Attachment 1	Projection of Revenue
Attachment 2	Summary of Revenue Requirements
Attachment 3	Class Allocation and Rate Design
Attachment 4	Transmission Tracker Account
Attachment 5	Erie 230/115 kV Substation
Attachment 6	Hoot Lake 115/41.6/34.5 kV Transformer
Attachment 7	Oslo-Lake Ardoch 115 kV
Attachment 8	Winger Transformer
Attachment 9	MISO Schedule 26 and Schedule 26A Expenses
Attachment 10	MISO Schedule 26, 37, and 38 Revenues
Attachment 11	MISO Schedule 26A Revenues
Attachment 12	MISO ARR Revenues
Attachment 13	Wholesale Revenue Credits
Attachment 14	Impact of Federal ADIT Proration on Revenue Requirement
Attachment 15	ADIT Proration Preservation
Attachment 16	Transmission Rider (redline and clean)
Attachment 17	Notice to Customers

**Projected Revenue for January 2024 through December 2024 Recovery Period**

Line No.	Class	Units	Rate per Unit	Amount
1	Large General Service	(a) 2,742,725 kW	\$0.321	\$880,431
2				
3	Controlled Service	(b) 150,266,943 kWh	0.016¢	\$24,593
4				
5	Lighting	(c) 6,798,005 kWh	0.100¢	\$6,784
6				
7	All other service	840,619,754 kWh	0.093¢	\$784,263
8				
9	Total revenue			<u>\$1,696,071</u>

- (a) Rate Schedules 10.04 Large General Service, 10.05 Large General Service - Time of Day, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider
- (b) Rate Schedules 14.01 Water Heating, 14.04 Interruptible Load (CT Metering), 14.05 Interruptible Load (Self-Contained Metering), 14.06 Deferred Load, 14.07 Fixed Time of Service and 14.12 Off-Peak Electric Vehicle Rider
- (c) Rate Schedules 11.03 Outdoor Lighting (energy only), 11.04 Outdoor Lighting and 11.07 LED Street and Area Lighting Dusk to Dawn

**Summary of Revenue Requirements**

Line No.	Revenue Requirements	January - December 2024
1	Erie Substation	299,613
2	Hoot Lake Transformer	57,714
3	Oslo Lake Ardoch	75,795
4	Winger Transformer	212,253
5		
6	Schedule 26 Expense	5,622,295
7	Schedule 26A Expense	4,435,693
8		
9	Schedule 26 Revenue	(6,893,326)
10	Schedule 37 & 38 Revenue	(147,614)
11	Schedule 26A Revenue	(1,490,881)
12	MVP ARR Revenue	(25,757)
13		
14	Carrying Cost	0
15	True-Up	(449,714)
16		
17	Net Revenue Requirement	<u>\$1,696,071</u>

**Class Allocation and Current Rate Design**

Line No.		January - December 2024
1	Total Minnesota Revenue Requirements	\$1,696,071
2		
3	Large General Service 51.91%	\$880,431
4	Controlled Service 1.45%	\$24,593
5	Lighting 0.40%	\$6,784
6	All Other Service 46.24%	\$784,263
7		
8	Total	\$1,696,071
9		
10		
11	Large General Service kW	2,742,725
12		
13	Controlled Service kWh	150,266,943
14	Lighting kWh	6,798,005
15	All Other Service kWh	840,619,754
16		
17		
18	Large General Service \$ / kW	0.321
19		
20	Controlled Service cents / kWh	0.016
21	Lighting cents / kWh	0.100
22	All Other Service cents / kWh	0.093

\* Jurisdictional transmission allocation factor (D2 = 49.814%) is from Otter Tail's most recent general rate case in Minnesota (E017-GR-20-719).

Percent of Revenue Rate Design per Order Item 6 in Docket No. E017/M-10-1061							
15	Forecasted Minnesota Retail Revenues (January 2024 - December 2024)	\$	145,972,288	\$	145,972,288		
16	Revenue Requirement		\$1,696,071		\$1,696,071		
17	Percent of revenue rate for MN TCRR		1.162%		1.162%		
	A	B	C	D	E	F	G
	Forecast Base Revenue January 2024- December 2024	# of Customers	Average Base Revenue per Customer per Month (Column A / Column B / 18)	Average TCR Revenue per Customer Per Month from % Base Revenue (1)	Avg kW per month	Avg kWh per month	Average TCR Revenue per Customer Per Month per Current Rate Design (2)
18	Large General Service	\$72,177,209	471	\$12,770	\$148.38	485	\$155.69
19	Controlled Service	\$6,201,494	14,489	\$36	\$0.41	864	\$0.14
20	Lighting	\$1,357,594	635	\$178	\$2.07	892	\$0.89
21	All Other Service	\$66,235,991	62,921	\$88	\$1.02	1,113	\$1.04
22	Total	\$145,972,288					
(1) Percent of Revenue Rate of 1.162% X Average Monthly Customer Bill in Column C (2) Corresponding Proposed rate from Current Rate Design X average kW (Column E) or average kWh (Column F)							

<b>SUMMARY E017/M-21-811</b>		<b>July 2022 - Dec 2023</b>
Revenue requirements		\$3,493,183
Carrying Charge		6,715
True-up		<u>3,672,593</u>
Total requirements		<u>\$7,172,491</u>
Jan 2023 - Dec 2023 projected sales		4,020,380
Average Rate		\$0.00178

<sup>5</sup> Line No. 31/ Line No. 27



Line No	TRACKER SUMMARY Requirements Compared to Billed:	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024	2024
		January Projected	February Projected	March Projected	April Projected	May Projected	June Projected	July Projected	August Projected	September Projected	October Projected	November Projected	December Projected	YE Projected
1	<b>Revenue Requirements</b>													
2	Erie Substation	24,968	24,968	24,968	24,968	24,968	24,968	24,968	24,968	24,968	24,968	24,968	24,968	299,613
3	Hoot Lake Transformer	4,810	4,810	4,810	4,810	4,810	4,810	4,810	4,810	4,810	4,810	4,810	4,810	57,714
4	Oslo Lake Ardorch	5,812	5,852	5,892	5,931	6,015	6,095	6,214	6,413	6,572	6,841	7,040	7,119	75,795
5	Winger Transformer	17,688	17,688	17,688	17,688	17,688	17,688	17,688	17,688	17,688	17,688	17,688	17,688	212,253
6	<b>Total Revenue Requirements</b>	53,277	53,317	53,357	53,396	53,480	53,560	53,679	53,878	54,037	54,306	54,505	54,584	645,375
7	<b>Preservation of ADIT Proration</b>													
8														
9	<b>MISO Expenses</b>													
10	MISO Schedule 26 Expense	559,990	543,190	498,391	419,992	369,593	442,392	453,592	453,592	391,993	464,791	464,791	559,990	5,622,295
11	MISO Schedule 26A Expense	444,109	409,124	391,723	350,506	330,112	323,294	347,700	348,683	331,170	350,448	381,462	427,362	4,435,693
12	<b>Total MISO Expenses</b>	1,004,098	952,314	890,113	770,498	699,705	765,686	801,292	802,274	723,163	815,240	846,254	987,352	10,057,988
13														
14	<b>MISO Revenues</b>													
15	MISO Schedule 26 Revenue	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(574,444)	(6,893,326)
16	MISO Schedule 37 & 38 Revenue	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(12,301)	(147,614)
17	MISO Schedule 26A Revenue	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(124,240)	(1,490,881)
18	MISO MVP ARR Revenue	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(2,146)	(25,757)
19	<b>Total MISO Revenues</b>	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(713,131)	(8,557,578)
20														
21	<b>Net Revenue Requirement</b>	344,244	292,499	230,339	110,763	40,053	106,114	141,839	143,021	64,069	156,414	187,627	328,805	2,145,786
22														
23	Billed (forecast kWh x adj factor)	164,635	152,269	147,527	132,827	128,669	127,948	137,546	137,253	128,666	135,351	143,916	159,465	1,696,071
24														
25	Monthly Revenue Difference	179,609	140,230	82,812	(22,064)	(88,615)	(21,835)	4,293	5,768	(64,597)	21,063	43,710	169,340	449,714
26	Carrying Charge	0	0	0	0	0	0	0	0	0	0	0	0	0
27	Life-to-Date Revenue Requirement (Cumulative Difference)	(270,106)	(129,876)	(47,064)	(69,128)	(157,743)	(179,577)	(175,285)	(169,517)	(234,114)	(213,050)	(169,340)	0	0
28														
29	<b>BSAT Portion of Tracker Balance</b>													
30	Monthly Change in BSAT Portion of Tracker <sup>1</sup>													
31	BSAT Portion of Tracker Balance <sup>2</sup>													
32	Carrying Charge <sup>3</sup>													
33	Cumulative Carrying Charge													
34	Carrying cost <sup>4</sup>													
35														
36														
37	Forecasted Sales (MWh)	255,609	236,410	229,046	206,224	199,768	198,650	213,551	213,096	199,763	210,142	223,441	247,581	2,633,282
38														
39	BSAT Portion of Tracker Balance (%) <sup>5</sup>													

<sup>1</sup> Line No. 23 x Line No. 39

<sup>2</sup> Previous Month Line No. 31 - Current Month Line No. 30

<sup>3</sup> Commission's November 10, 2020 Order Point 7 in

Docket No. E017/M-18-748

<sup>4</sup> November 2020 is 20 / 30 of the Short Term Debt Rate

<sup>5</sup> Line No. 31 / Line No. 27

		Jan 2024 - Dec 2024
<b>SUMMARY</b>		
Revenue requirements		\$2,145,786
Carrying Charge (Ended 2/1/14 per Orders)		0
True-up		(449,714)
Total requirements		\$1,696,071
Jan 2024 - Dec 2024 projected sales		2,633,282
Average Rate		\$0.00064

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Line No.	Year>>	2022	2022	2022	2022	2022	2022	2022	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023	2023
		Actual Jul	Actual Aug	Actual Sep	Actual Oct	Actual Nov	Actual Dec	Actual Total	Actual Jan	Actual Feb	Projected Mar	Projected Apr	Projected May	Projected Jun	Projected Jul	Projected Aug	Projected Sep	Projected Oct	Projected Nov	Projected Dec	Projected Total	
1	<b>RATE BASE</b>																					
2	Plant Balance	0	0	0	0	0	0	0	0	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	1,242,922	
3	Accumulated Depreciation	0	0	0	0	0	0	0	(121)	(243)	(1,956)	(3,670)	(5,384)	(7,097)	(8,811)	(10,525)	(12,238)	(13,952)	(15,666)	(17,380)	(17,380)	
4	Net Plant in Service	0	0	0	0	0	0	0	(121)	1,242,680	1,240,966	1,239,252	1,237,539	1,235,825	1,234,111	1,232,397	1,230,684	1,228,970	1,227,256	1,225,543	1,225,543	
5	<b>CWIP Calculation:</b>								1,242,922	1,242,922	0	0	0	0	0	0	0	0	0	0	0	
6	Beginning Balance	225,326	231,532	237,052	1,072,986	1,230,144	1,239,648	1,335,103	239	0	0	0	0	0	0	0	0	0	0	0	239	
7	Additional CWIP	8,778	11,143	862,736	198,953	15,337	9,351	(92,232)	(239)	0	0	0	0	0	0	0	0	0	0	0	(239)	
8	Remove Internal Costs	(2,573)	(5,622)	(26,802)	(41,795)	(5,833)	(6,077)															
9	Closings from CWIP									(1,242,922)	0	0	0	0	0	0	0	0	0	0	0	
10	AFDUC																					
11	CWIP (Project #T03032.031)	105866																			0	
12	ADIT Federal Proration Factors	107308							1,0000	1,0000	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027		
13	Accumulated Deferred Income Taxes Federal & State		0	0	0	0	(1,361)	(1,361)	(1,541)	(1,722)	(1,489)	(1,272)	(1,070)	(883)	(711)	(555)	(414)	(288)	(178)	(83)	(83)	
14	Ending rate base	231,532	237,052	1,072,986	1,230,144	1,239,648	1,241,562	1,241,562	1,241,260	1,240,958	1,239,477	1,237,981	1,236,469	1,234,942	1,233,400	1,231,843	1,230,270	1,228,682	1,227,078	1,225,460	1,225,460	
15	Average rate base	40,100	40,100	40,100	40,100	40,100	40,100	481,201	102,881	102,881	102,881	102,881	102,881	102,881	102,881	102,881	102,881	102,881	102,881	102,881	1,234,568	
16	Return on Rate Base	2,878	2,878	2,878	2,878	2,878	2,878	34,532	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	88,596	
17	Available for return (equity portion of rate base)	1,996	1,996	1,996	1,996	1,996	1,996	23,949	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	61,444	
18																						
19																						
20	<b>EXPENSES</b>																					
21	O&M and Depreciation																					
22	Operating Costs	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
23	Property Tax	0	0	0	0	0	0	0	148	148	148	148	148	148	148	148	148	148	148	148	1,780	
24	Property Tax Adjustment	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
25	Book Depreciation	0	0	0	0	0	0	0	121	121	1,714	1,714	1,714	1,714	1,714	1,714	1,714	1,714	1,714	1,714	17,380	
26	Total O&M and Depreciation Expense	0	0	0	0	0	0	0	270	270	1,862	1,862	1,862	1,862	1,862	1,862	1,862	1,862	1,862	1,862	19,159	
27																						
28	Income before Taxes																					
29	Available for return (from above)	1,996	1,996	1,996	1,996	1,996	1,996	23,949	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	5,120	61,444	
30	Taxable Income (grossed up)	2,801	2,801	2,801	2,801	2,801	2,801	33,609	7,186	7,186	7,186	7,186	7,186	7,186	7,186	7,186	7,186	7,186	7,186	7,186	86,228	
31																						
32	Income Taxes																					
33	Current Income Tax	805	805	805	805	805	(556)	8,299	1,885	1,885	2,342	2,342	2,342	2,342	2,342	2,342	2,342	2,342	2,342	2,342	27,194	
34	Def Income Tax	0	0	0	0	0	1,361	1,361	181	181	(277)	(277)	(277)	(277)	(277)	(277)	(277)	(277)	(277)	(277)	(2,410)	
35	Total Income Tax Expense	805	805	805	805	805	805	9,660	2,065	2,065	2,065	2,065	2,065	2,065	2,065	2,065	2,065	2,065	2,065	2,065	24,784	
36																						
37																						
38	<b>REVENUE REQUIREMENTS</b>																					
39	Expenses	805	805	805	805	805	805	9,660	2,335	2,335	3,927	3,927	3,927	3,927	3,927	3,927	3,927	3,927	3,927	3,927	43,943	
40	Return on rate base	2,878	2,878	2,878	2,878	2,878	2,878	34,532	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	7,383	88,596	
41	Subtotal revenue requirements	3,683	3,683	3,683	3,683	3,683	3,683	44,192	9,718	9,718	11,310	11,310	11,310	11,310	11,310	11,310	11,310	11,310	11,310	11,310	132,539	
42	Adjustments	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
43	Wholesale Revenue Credit	(806)	(806)	(806)	(806)	(806)	(806)	(9,676)	(1,639)	(1,639)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(1,907)	(22,347)	
44	Total revenue requirements	2,876	2,876	2,876	2,876	2,876	2,876	34,516	8,079	8,079	9,403	9,403	9,403	9,403	9,403	9,403	9,403	9,403	9,403	9,403	110,192	
45																						
46	Minnesota share - D2 factor	1,433	1,433	1,433	1,433	1,433	1,433	17,194	4,025	4,025	4,684	4,684	4,684	4,684	4,684	4,684	4,684	4,684	4,684	4,684	54,891	
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Line No.	Year>>	2024 Projected Jan	2024 Projected Feb	2024 Projected Mar	2024 Projected Apr	2024 Projected May	2024 Projected Jun	2024 Projected Jul	2024 Projected Aug	2024 Projected Sep	2024 Projected Oct	2024 Projected Nov	2024 Projected Dec	2024 Projected Total
	<b>RATE BASE</b>													
1	Plant Balance	694,434	769,434	844,434	1,001,934	1,151,934	1,376,934	1,751,934	2,051,934	2,558,184	2,933,184	3,083,380	3,083,380	3,083,380
2	Accumulated Depreciation	(3,038)	(3,951)	(4,960)	(6,066)	(7,373)	(8,872)	(10,660)	(12,927)	(15,580)	(18,881)	(22,662)	(26,636)	(26,636)
3	Net Plant in Service	691,396	765,483	839,474	995,868	1,144,561	1,368,062	1,741,275	2,039,007	2,542,604	2,914,304	3,060,718	3,056,744	3,056,744
4	<b>CWIP Calculation:</b>													
5	Beginning Balance	0	0	0	0	0	0	0	0	0	0	0	0	0
6	Additional CWIP	100,000	100,000	100,000	210,000	200,000	300,000	500,000	400,000	675,000	500,000	200,261	0	3,285,261
7	Remove Internal Costs	(25,000)	(25,000)	(25,000)	(52,500)	(50,000)	(75,000)	(125,000)	(100,000)	(168,750)	(125,000)	(50,065)	0	0
8	Closings from CWIP	(75,000)	(75,000)	(75,000)	(157,500)	(150,000)	(225,000)	(375,000)	(300,000)	(506,250)	(375,000)	(150,196)	0	0
9	AFDUC													
9	CWIP (Project #T05032.0322 ) 107761	0	0	0	0	0	0	0	0	0	0	0	0	0
10	ADIT Federal Proration Factors	0.9178	0.8411	0.7562	0.6740	0.5890	0.5069	0.4219	0.3370	0.2548	0.1699	0.0877	0.0027	
11	Accumulated Deferred Income Taxes Federal & State	(142)	59	271	491	715	924	1,219	1,565	1,934	2,347	2,765	3,144	3,144
12	Ending rate base	691,254	765,542	839,745	996,360	1,145,277	1,368,987	1,742,494	2,040,572	2,544,538	2,916,650	3,063,483	3,059,888	3,059,888
13														
14	Average rate base	139,690	139,690	139,690	139,690	139,690	139,690	139,690	139,690	139,690	139,690	139,690	139,690	1,676,283
15														
16	Return on Rate Base	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	120,294
17														
18	Available for return (equity portion of rate base)	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	83,429
19														
20	<b>EXPENSES</b>													
21	<b>O&amp;M and Depreciation</b>													
22	Operating Costs	0	0	0	0	0	0	0	0	0	0	0	0	0
23	Property Tax	1,379	1,379	1,379	1,379	1,379	1,379	1,379	1,379	1,379	1,379	1,379	1,379	16,553
24	Property Tax Adjustment	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(992)	(11,899)
25	Book Depreciation	817	913	1,009	1,105	1,307	1,499	1,788	2,268	2,652	3,301	3,781	3,974	24,415
26	Total O&M and Depreciation Expense	1,205	1,301	1,397	1,493	1,695	1,887	2,175	2,656	3,040	3,689	4,169	4,362	29,068
27														
28	Income before Taxes													
29	Available for return (from above)	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	6,952	83,429
30	Taxable Income (grossed up)	9,757	9,757	9,757	9,757	9,757	9,757	9,757	9,757	9,757	9,757	9,757	9,757	117,080
31														
32	Income Taxes													
33	Current Income Tax	3,002	3,029	3,057	3,084	3,142	3,198	3,281	3,419	3,529	3,716	3,854	3,909	40,219
34	Def Income Tax	(197)	(225)	(253)	(280)	(338)	(393)	(476)	(614)	(725)	(911)	(1,049)	(1,105)	(6,568)
35	Total Income Tax Expense	2,804	2,804	2,804	2,804	2,804	2,804	2,804	2,804	2,804	2,804	2,804	2,804	33,651
36														
37														
38	<b>REVENUE REQUIRMENTS</b>													
39	Expenses	4,009	4,105	4,201	4,297	4,499	4,691	4,980	5,460	5,844	6,493	6,973	7,166	62,719
40	Return on rate base	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	10,025	120,294
41	Subtotal revenue requirements	14,034	14,130	14,226	14,322	14,524	14,716	15,004	15,485	15,869	16,517	16,998	17,190	183,013
42	Adjustments	0	0	0	0	0	0	0	0	0	0	0	0	0
43	Wholesale Revenue Credit	(2,366)	(2,382)	(2,399)	(2,415)	(2,449)	(2,481)	(2,530)	(2,611)	(2,676)	(2,785)	(2,866)	(2,898)	(30,857)
44	Total revenue requirements	11,667	11,747	11,827	11,907	12,075	12,235	12,474	12,874	13,193	13,732	14,132	14,292	152,156
45														
46	Minnesota share - D2 factor	5,812	5,852	5,892	5,931	6,015	6,095	6,214	6,413	6,572	6,841	7,040	7,119	75,795
Line No.														
	<b>SUPPORTING INFORMATION / DATA</b>													
1														
2														
3	MN Cap Structure with allowed ROE per order.													
4	Capital Structure													
5	Debt													
6	Preferred equity													
7	Common equity													
8	Total													
9														
10														
11	Project life (years)													
12														
13														
14														
15														
16														
17														
18														
19	<b>Deferred Tax</b>													
20	Book depreciation	817	913	1,009	1,105	1,307	1,499	1,788	2,268	2,652	3,301	3,781	3,974	24,415
21	Tax depreciation-Federal	130	130	130	130	130	130	130	130	130	130	130	130	1,563
22	Tax depreciation-MN	130	130	130	130	130	130	130	130	130	130	130	130	1,563
23	Federal deferred income taxes	130	148	166	185	185	185	314	405	478	601	692	728	4,216
	State deferred income taxes	67	77	86	96	115	115	162	209	247	311	358	377	2,221

[illegible]

		2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022	2022
Line No.	SCHEDULE 26 & SCHEDULE 26A	Jan Actual	Feb Actual	Mar Actual	Apr Actual	May Actual	Jun Actual	Jul Actual	Aug Actual	Sep Actual	Oct Actual	Nov Actual	Dec Actual	YE Actual
1	MISO Schedule 26 Expense	1,151,356	989,586	948,009	885,389	739,831	925,737	981,220	891,894	921,284	991,230	1,081,387	1,168,138	11,675,061
2	OTP owned portion of expenses not recoverable via rider	0	0	0	0	0	0	0	0	0	0	0	0	0
3	MISO Schedule 26 Expense Recoverable	1,151,356	989,586	948,009	885,389	739,831	925,737	981,220	891,894	921,284	991,230	1,081,387	1,168,138	11,675,061
4														
5	MISO Settlements	(9,394)												
6														
7	Minnesota share	49.814%	564,140	492,950	472,239	441,046	368,537	461,144	488,782	444,286	458,926	493,769	538,679	5,806,391
8														
9	MISO Schedule 26A Expense	954,250	832,139	755,185	703,080	658,320	665,856	711,869	728,091	693,122	765,555	801,977	897,156	9,166,601
10	OTP owned portion of expenses not recoverable via rider	(28,502)	(24,855)	(22,556)	(21,000)	(19,663)	(19,888)	(21,262)	(21,747)	(20,702)	(22,866)	(23,954)	(26,797)	(273,791)
11	MISO Schedule 26A Expense Recoverable	925,748	807,285	732,629	682,080	638,657	645,968	690,607	706,344	672,420	742,689	778,024	870,360	8,892,810
12														
13	MISO Settlements	260												
14														
15	Minnesota share	49.814%	461,410	402,139	364,950	339,770	318,139	321,781	344,017	351,856	334,957	369,961	387,563	4,430,102

Line No.		2023												YE
		Jan Actual	Feb Actual	Mar Projected	Apr Projected	May Projected	Jun Projected	Jul Projected	Aug Projected	Sep Projected	Oct Projected	Nov Projected	Dec Projected	
1	MISO Schedule 26 Expense	1,148,034	1,006,903	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	11,843,523
2	OTP owned portion of expenses not recoverable via rider	0	0	0	0	0	0	0	0	0	0	0	0	0
3	MISO Schedule 26 Expense Recoverable	1,148,034	1,006,903	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	968,859	11,843,523
4														
5	<b>Minnesota share</b>	<b>49.814%</b>	<b>571,879</b>	<b>501,576</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>482,625</b>	<b>5,899,702</b>
6														
7	MISO Schedule 26A Expense	1,005,095	900,391	981,781	981,781	981,781	981,781	981,781	981,781	981,781	981,781	981,781	981,781	11,723,296
8	OTP owned portion of expenses not recoverable via rider	(31,480)	(28,200)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(30,749)	(367,175)
9	MISO Schedule 26A Expense Recoverable	973,616	872,191	951,031	951,031	951,031	951,031	951,031	951,031	951,031	951,031	951,031	951,031	11,356,121
10														
11	<b>Minnesota share</b>	<b>49.814%</b>	<b>484,994</b>	<b>434,471</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>473,744</b>	<b>5,656,909</b>

Line No.		2024												YE
		Jan Projected	Feb Projected	Mar Projected	Apr Projected	May Projected	Jun Projected	Jul Projected	Aug Projected	Sep Projected	Oct Projected	Nov Projected	Dec Projected	
1	MISO Schedule 26 Expense	1,124,167	1,090,442	1,000,508	843,125	741,950	888,092	910,575	910,575	786,917	933,058	933,058	1,124,167	11,286,635
2	OTP owned portion of expenses not recoverable via rider	0	0	0	0	0	0	0	0	0	0	0	0	0
3	MISO Schedule 26 Expense Recoverable	1,124,167	1,090,442	1,000,508	843,125	741,950	888,092	910,575	910,575	786,917	933,058	933,058	1,124,167	11,286,635
4														
5	<b>Minnesota share</b>	<b>49.814%</b>	<b>559,990</b>	<b>543,190</b>	<b>498,391</b>	<b>419,992</b>	<b>369,593</b>	<b>442,392</b>	<b>453,592</b>	<b>453,592</b>	<b>391,993</b>	<b>464,791</b>	<b>464,791</b>	<b>5,622,295</b>
6														
7	MISO Schedule 26A Expense	920,364	847,863	811,801	726,383	684,119	669,990	720,569	722,605	686,313	726,264	790,537	885,659	9,192,467
8	OTP owned portion of expenses not recoverable via rider	(28,826)	(26,555)	(25,426)	(22,750)	(21,427)	(20,984)	(22,568)	(22,632)	(21,495)	(22,747)	(24,760)	(27,739)	(287,909)
9	MISO Schedule 26A Expense Recoverable	891,539	821,308	786,375	703,633	662,692	649,005	698,000	699,973	664,818	703,517	765,777	857,920	8,904,557
10														
11	<b>Minnesota share</b>	<b>49.814%</b>	<b>444,109</b>	<b>409,124</b>	<b>391,723</b>	<b>350,506</b>	<b>330,112</b>	<b>323,294</b>	<b>347,700</b>	<b>348,683</b>	<b>331,170</b>	<b>350,448</b>	<b>381,462</b>	<b>4,435,693</b>



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**2024 Attachment O Filing**

Line No.					Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)				\$51,258,987
	REVENUE CREDITS	(Note T)	<b>Total</b>	<b>Allocator</b>	
2	Account No. 454	(page 4, line 34)	222,051	TP 1.00000	222,051
3	Account No. 456.1	(page 4, line 37)	8,420,585	TP 1.00000	8,420,585
4	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0
5	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0
6	TOTAL REVENUE CREDITS (sum lines 2-5)				8,642,636
7				Wholesale Revenue Credit	16.86%

**2023 Attachment O Filing**

Line No.					Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)				\$51,258,987
	REVENUE CREDITS	(Note T)	<b>Total</b>	<b>Allocator</b>	
2	Account No. 454	(page 4, line 34)	222,051	TP 1.00000	222,051
3	Account No. 456.1	(page 4, line 37)	8,420,585	TP 1.00000	8,420,585
4	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0
5	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0
6	TOTAL REVENUE CREDITS (sum lines 2-5)				8,642,636
7				Wholesale Revenue Credit	16.86%

**2022 Attachment O Filing**

Line No.					Allocated Amount
1	GROSS REVENUE REQUIREMENT (page 3, line 31)				\$40,512,693
	REVENUE CREDITS	(Note T)	<b>Total</b>	<b>Allocator</b>	
2	Account No. 454	(page 4, line 34)	196,605	TP 1.00000	196,605
3	Account No. 456.1	(page 4, line 37)	8,673,901	TP 1.00000	8,673,901
4	Revenues from Grandfathered Interzonal Transactions		0	TP 1.00000	0
5	Revenues from service provided by the ISO at a discount		0	TP 1.00000	0
6	TOTAL REVENUE CREDITS (sum lines 2-5)				8,870,506
7				Wholesale Revenue Credit	21.90%

**Federal ADIT Proration**

January 2024 - December 2024 Recovery Period				
Line No.	Month	All Projects' Revenue Requirements without ADIT Prorated	All Projects' Revenue Requirements with ADIT-Prorated	Difference due to Federal ADIT Proration (B - A)
1	Jan-24	\$ 53,089	\$ 53,277	\$ 188
2	Feb-24	53,129	53,317	188
3	Mar-24	53,169	53,357	188
4	Apr-24	53,209	53,396	188
5	May-24	53,292	53,480	188
6	Jun-24	53,372	53,560	188
7	Jul-24	53,491	53,679	188
8	Aug-24	53,690	53,878	188
9	Sep-24	53,849	54,037	188
10	Oct-24	54,118	54,306	188
11	Nov-24	54,317	54,505	188
12	Dec-24	54,397	54,584	188
13	Total	\$ 643,123	\$ 645,375	\$ 2,252
14				
15	<b>Revenue Requirement Related to</b>			
16	<b>Federal ADIT Proration-Projection</b>			
			\$	<b>2,252</b>

**Federal ADIT Proration  
Preserve True-Up Period**

A B C D

January 2024 - December 2024 Recovery Period				
Line No.	Month	Original ADIT Balance - All Projects with ADIT Pro-Rated	Updated ADIT Balance - All Projects without ADIT Pro-Rated	Difference due to Federal ADIT Proration (B - A)
1	Jan-24	\$ -	(2,433)	\$ (2,433)
2	Feb-24	-	(2,433)	
3	Mar-24	-	(2,433)	
4	Apr-24	-	(2,433)	
5	May-24	-	(2,568)	
6	Jun-24	-	(2,638)	
7	Jul-24	-	(2,710)	
8	Aug-24	-	(2,782)	
9	Sep-24	-	(2,853)	
10	Oct-24	-	(2,925)	
11	Nov-24	-	(2,997)	
12	Dec-24	-	(3,069)	
13	Jan-25	-	(4,037)	(4,037)
14	Simple Average	\$ -	\$ (3,235)	\$ (3,235)
15				
16	Rate Base Rev Req Gross Up Factor			9.86%
17	Total Company Revenue Requirement			\$ (319)
18				
19	<b>MN Revenue Requirement Related to</b>			
20	<b>Federal ADIT Proration-Preservation</b>			<b>\$ (159)</b>
21				
22	Tax Conversion Factor	1.5385	(1/(1-35%))	
23	Gross Up of Equity %	7.66%	(C22 * C30)	
24	Equity Return %	4.98%	(C30)	
25	Gross Up Factor	2.68%	(C23 - C24)	
26				
27		<b>Annual</b>	<b>Monthly</b>	
28	Debt Return %	2.20%	0.18%	
29	Preferred Equity %	0.00%	0.00%	
30	Equity Return %	4.98%	0.41%	
31	Rate of Return	7.18%	0.60%	
32	Tax RR on Equity Return	2.68%	0.22%	
33	Rate Base Rev Req Gross Up Factor	9.86%	0.82%	
34	Monthly Gross Up Factor (D11) Multiplied by MN D2 Factor		0.07%	

Attachment 16  
Redline and Clean Versions of  
Tariff Sheet MN 13.05 – Transmission Cost  
Recovery Rider





Fergus Falls, Minnesota

Minnesota Public Utilities Commission  
Section 13.05  
ELECTRIC RATE SCHEDULE  
Transmission Cost Recovery Rider

Page 1 of 2

~~Eleventh~~<sup>Tenth</sup> Revision

## TRANSMISSION COST RECOVERY RIDER

DESCRIPTION	RATE CODE
Large General Service – Demand charge	MTCRD
Large General Service – Energy charge	MTCRE
Controlled Service	MTCRC
Lighting	MTCRL
All Other Service	MTCRO

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

**AVAILABILITY:** This rider is available to any electric service under all of the Company's retail rate schedules.

**COST RECOVERY FACTOR:** There shall be included on each Minnesota Customer's monthly bill a Transmission Cost Recovery charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

### **RATE:**

TRANSMISSION COST RECOVERY			
Energy Charge per kWh:		kWh	kW
Large General Service	(a)	N/A ¢/kWh	\$0. <del>905</del> <sup>321</sup>
Controlled Service	(b)	<del>0.050</del> <sup>016</sup> ¢/kWh	N/A
Lighting	(c)	<del>0.269</del> <sup>100</sup> ¢/kWh	N/A
All Other Service		<del>0.262</del> <sup>093</sup> ¢/kWh	N/A
(a) Rate schedules 10.04 Large General Service, 10.05 Large General Service – Time of Day, 10.06 Super Large General Service, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider.			
(b) Rate Schedules 14.01 Water Heating, 14.04 Interruptible Load Self-Contained and CT Metering, 14.06 Deferred Load, 14.07 Fixed Time of Service, and 14.12 Off-Peak Electric Vehicle Rider.			
(c) Rate Schedules 11.03 Outdoor Lighting (Energy only), 11.04 Outdoor Lighting and 11.07 LED Street and Area Lighting Dusk to Dawn.			

MINNESOTA PUBLIC  
UTILITIES COMMISSION  
Approved: ~~July 12, 2022~~  
Docket No. E017/M-23-~~1-811~~

Bruce G. Gerhardson  
Vice President, Regulatory  
Affairs

EFFECTIVE with bills rendered  
on and after  
~~January 1, 2024~~<sup>August 1, 2022</sup>  
in Minnesota



Fergus Falls, Minnesota

Minnesota Public Utilities Commission  
Section 13.05  
**ELECTRIC RATE SCHEDULE**  
**Transmission Cost Recovery Rider**

Page 1 of 2  
Eleventh Revision

**TRANSMISSION COST RECOVERY RIDER**

DESCRIPTION	RATE CODE
Large General Service – Demand charge	MTCRD
Large General Service – Energy charge	MTCRE
Controlled Service	MTCRC
Lighting	MTCRL
All Other Service	MTCRO

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

**AVAILABILITY:** This rider is available to any electric service under all of the Company's retail rate schedules.

**COST RECOVERY FACTOR:** There shall be included on each Minnesota Customer's monthly bill a Transmission Cost Recovery charge, which shall be calculated before any applicable municipal payment adjustments and sales taxes as provided in the General Rules and Regulations for the Company's electric service. The following charges are applicable in addition to all charges for service being taken under the Company's standard rate schedules.

**RATE:**

TRANSMISSION COST RECOVERY			
Energy Charge per kWh:		kWh	kW
<b>Large General Service</b>	(a)	N/A ¢/kWh	\$0.321
<b>Controlled Service</b>	(b)	0.016 ¢/kWh	N/A
<b>Lighting</b>	(c)	0.100 ¢/kWh	N/A
<b>All Other Service</b>		0.093 ¢/kWh	N/A
(a) Rate schedules 10.04 Large General Service, 10.05 Large General Service – Time of Day, 10.06 Super Large General Service, 14.02 Real Time Pricing Rider and 14.03 Large General Service Rider.			
(b) Rate Schedules 14.01 Water Heating, 14.04 Interruptible Load Self-Contained and CT Metering, 14.06 Deferred Load, 14.07 Fixed Time of Service, and 14.12 Off-Peak Electric Vehicle Rider.			
(c) Rate Schedules 11.03 Outdoor Lighting (Energy only), 11.04 Outdoor Lighting and 11.07 LED Street and Area Lighting Dusk to Dawn.			

**R  
R  
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## Customer notice

The Minnesota Public Utilities Commission approved an adjustment to our Transmission Cost Recovery Rider, which is part of the Resource Adjustment line on your monthly electric service bill. This rider recovers costs related to transmission projects that help ensure we can continue to provide you with low-cost, reliable service.

This table shows the prior and new rates, beginning January 1, 2024, for all classes of customers. A residential customer who uses 1,000 kWh per month will see a bill decrease of \$1.69.

Class	Prior rate	January 1, 2024, rate
Large General Service	\$0.905 per kW	\$0.321 per kW
Controlled Service	\$0.00050 per kwh	\$0.00016 per kwh
Lighting	\$0.00269 per kwh	\$0.00100 per kwh
All Other Service	\$0.00262 per kwh	\$0.00093 per kwh

For more information contact Customer Service at 800-257-4044 or visit [otpc.com](https://otpc.com).

## **CERTIFICATE OF SERVICE**

**Re: In the Matter of Otter Tail Power Company's Petition for Approval of the Annual Rate Update to its Transmission Cost Recovery Rider Annual Adjustment, Rate Schedule 13.05  
Docket No. E017/M-23-**

I, Valerie Moxness, 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  
Annual Update and Eligibility Filing**

Dated this 7<sup>th</sup> day of **April, 2023**.

/s/ Valerie Moxness

Valerie Moxness  
Regulatory Filing Coordinator  
Otter Tail Power Company  
215 South Cascade Street  
Fergus Falls MN 56537  
(218) 739-8346

[illegible]

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider
Generic Notice	Regulatory	regulatory_filing_coordinators@otpc.com	Otter Tail Power Company	215 S. Cascade Street Fergus Falls, MN 56537	Electronic Service	No	GEN_SL_Otter Tail Power Company_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider
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_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider
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_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider
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_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider
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_GEN_SL_Otter Tail Power Company_2023 Transmission Cost Recovery Rider