

STATE OF MINNESOTA

OFFICE OF THE ATTORNEY GENERAL

April 9, 2018

SUITE 1400 445 MINNESOTA STREET ST. PAUL, MN 55101-2131 TELEPHONE: (651) 296-7575

LORI SWANSON ATTORNEY GENERAL

Mr. Daniel Wolf Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101-2147

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota **MPUC Docket No. G-017/GR-15-1033**

Dear Mr. Wolf:

The Office of the Attorney General-Residential Utilities and Antitrust Division ("OAG") respectfully submits this letter in response to the Joint Request of Otter Tail Power Company and Minnesota Chamber of Commerce to Reopen October 30, 2017 Order Approving Compliance Filing ("Request") submitted to the Public Utilities Commission ("Commission") on March 30, 2018. The purpose of this letter is to inform the Commission that the OAG does not object to the Request.

The Request asks the Commission to reopen its October 30, 2017 Order Approving Compliance Filing and Provisionally Approving Transmission Cost Recovery Rate Rider Rate ("Order") pursuant to Minnesota Statute § 216B.25.¹ The Request addresses an agreement between Otter Tail Power Company ("Otter Tail") and the Minnesota Chamber of Commerce to resolve an issue which the OAG has not taken a position on. The Request further asserts that it is needed to "conform to the intent and principles" of that agreement, and certifies that it will not affect Otter Tail's revenue requirement or any class' overall revenue levels.² Accordingly, the OAG takes no position on the Request and does not object to the Commission taking action on the Request, so long as that action does not in any way affect the rates of residential or small business customers.

Sincerely,

s/ Joseph C. Meyer

JOSEPH C. MEYER Assistant Attorney General

(651) 757-1433 (Voice) (651) 296-9663 (Fax)

¹ Request at 1.

² Request at 1-2.



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Mr. Daniel Wolf Executive Secretary Minnesota Public Utilities Commission 121 Seventh Place East, Suite 350 St. Paul, MN 55101-2147

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota **Docket No. E017/GR-15-1033**

Dear Mr. Wolf:

Enclosed and e-filed in the above-referenced matter please find Letter of the Office of the Attorney General – Residential Utilities and Antitrust Division

By copy of this letter all parties have been served. An affidavit of service is also enclosed.

Sincerely,

s/ Joseph C. Meyer

JOSEPH C. MEYER Assistant Attorney General

(651) 757-1433 (Voice) (651) 296-9663 (Fax)

Enclosures

cc: Service List

AFFIDAVIT OF SERVICE

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Utility Service in Minnesota Docket No. E017/GR-15-1033

STATE OF MINNESOTA)) ss. COUNTY OF RAMSEY)

I, DEANNA DONNELLY, hereby state that on the 9th day of April, 2018, I efiled with eDockets Letter of the Attorney General – Residential Utilities and Antitrust Division and served the same upon all parties listed on the attached service list by e-mail, and/or United States Mail with postage prepaid, and deposited the same in a U.S. Post Office mail receptacle in the City of St. Paul, Minnesota.

> <u>s/ Deanna Donnelly</u> DEANNA DONNELLY

Subscribed and sworn to before me this 9th day of April, 2018.

<u>s/ Patricia Jotblad</u>Notary PublicMy Commission expires: January 31, 2020.

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Christopher	Anderson	canderson@allete.com	Minnesota Power	30 W Superior St Duluth, MN 558022191	Electronic Service	No	OFF_SL_15-1033_Officia Service List
William A.	Blazar	bblazar@mnchamber.com	Minnesota Chamber Of Commerce	Suite 1500 400 Robert Street Nor St. Paul, MN 55101	Electronic Service th	No	OFF_SL_15-1033_Official Service List
Tom	Boyko	tboyko@eastriver.coop	East River Electric Power Coop.	211 S. Harth Ave Madison, SD 57042	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ray	Choquette	rchoquette@agp.com	Ag Processing Inc.	12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047	Electronic Service	No	OFF_SL_15-1033_Official Service List
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.st ate.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Joseph	Dammel	joseph.dammel@ag.state. mn.us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St. Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
William T	Davis	N/A	-	23456 Garland Ln Battle Lake, MN 56515-9665	Paper Service	No	OFF_SL_15-1033_Official Service List
lan	Dobson	residential.utilities@ag.stat e.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Charles	Drayton	charles.drayton@enbridge. com	Enbridge Energy Company, Inc.	7701 France Ave S Ste 600 Edina, MN 55435	Electronic Service	No	OFF_SL_15-1033_Official Service List
James C.	Erickson	jericksonkbc@gmail.com	Kelly Bay Consulting	17 Quechee St Superior, WI 54880-4421	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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_15-1033_Official Service List
Edward	Garvey	garveyed@aol.com	Residence	32 Lawton St Saint Paul, MN 55102	Electronic Service	No	OFF_SL_15-1033_Official Service List
Bruce	Gerhardson	bgerhardson@otpco.com	Otter Tail Power Company	PO Box 496 215 S Cascade St Fergus Falls, MN 565380496	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Dan	Harmelink	Dan.Harmelink@woodsfull er.com	Woods, Fuller, Shultz & Smith P.C.	300 S Phillips Ave Ste 300 PO Box 5027 Sioux Falls, SD 57117-5027	Electronic Service	No	OFF_SL_15-1033_Official Service List
Kimberly	Hellwig	kimberly.hellwig@stoel.co m	Stoel Rives LLP	33 South Sixth Street Suite 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Annete	Henkel	mui@mnutilityinvestors.org	Minnesota Utility Investors	413 Wacouta Street #230 St.Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Shane	Henriksen	shane.henriksen@enbridge .com	Enbridge Energy Company, Inc.	1409 Hammond Ave FL 2 Superior, WI 54880	Electronic Service	No	OFF_SL_15-1033_Official Service List
Linda	Jensen	linda.s.jensen@ag.state.m n.us	Office of the Attorney General-DOC	1800 BRM Tower 445 Minnesota Street St. Paul, MN 551012134	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Richard	Johnson	Rick.Johnson@lawmoss.co m	Moss & Barnett	150 S. 5th Street Suite 1200 Minneapolis, MN 55402	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Joel W.	Kanvik	joel.kanvik@enbridge.com	Enbridge Energy LLC	4628 Mike Colalillo Dr Duluth, MN 55807	Electronic Service	No	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Bill	Lachowitzer	blachowitzer@ibewlocal94 9.org	IBEW Local Union 949	12908 Nicollet Ave S Burnsville, MN 55337-3527	Electronic Service	No	OFF_SL_15-1033_Official Service List
Douglas	Larson	dlarson@dakotaelectric.co m	Dakota Electric Association	4300 220th St W Farmington, MN 55024	Electronic Service	No	OFF_SL_15-1033_Official Service List
James D.	Larson	james.larson@avantenergy .com	Avant Energy Services	220 S 6th St Ste 1300 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Eric	Lipman	eric.lipman@state.mn.us	Office of Administrative Hearings	PO Box 64620 St. Paul, MN 551640620	Electronic Service	No	OFF_SL_15-1033_Official Service List
Peter	Madsen	peter.madsen@ag.state.m n.us	Office of the Attorney General-DOC	Bremer Tower, Suite 1800 445 Minnesota Street St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Pam	Marshall	pam@energycents.org	Energy CENTS Coalition	823 7th St E St. Paul, MN 55106	Electronic Service	No	OFF_SL_15-1033_Official Service List
Joseph	Meyer	joseph.meyer@ag.state.mn .us	Office of the Attorney General-RUD	Bremer Tower, Suite 1400 445 Minnesota Street St Paul, MN 55101-2131	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Tom	Micheletti	tommicheletti@excelsioren ergy.com	Excelsior Energy Inc.	225 S 6th St Ste 2560 Minneapolis, MN 55402-4638	Electronic Service	No	OFF_SL_15-1033_Official Service List
Andrew	Moratzka	andrew.moratzka@stoel.co m	Stoel Rives LLP	33 South Sixth St Ste 4200 Minneapolis, MN 55402	Electronic Service	No	OFF_SL_15-1033_Official Service List
Ben	Passer	Passer@fresh-energy.org	Fresh Energy	408 St. Peter Street Ste 220 Saint Paul, MN 55102	Electronic Service	Yes	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
David G.	Prazak	dprazak@otpco.com	Otter Tail Power Company	P.O. Box 496 215 South Cascade S Fergus Falls, MN 565380496	Electronic Service treet	No	OFF_SL_15-1033_Official Service List
Rate Case Inbox	Rate Case Inbox	mnratecase@otpco.com	Otter Tail	N/A	Electronic Service	No	OFF_SL_15-1033_Official Service List
Richard	Savelkoul	rsavelkoul@martinsquires.c om	Martin & Squires, P.A.	332 Minnesota Street Ste W2750 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Larry L.	Schedin	Larry@LLSResources.com	LLS Resources, LLC	332 Minnesota St, Ste W1390 St. Paul, MN 55101	Electronic Service	No	OFF_SL_15-1033_Official Service List
Robert H.	Schulte	rhs@schulteassociates.co m	Schulte Associates LLC	1742 Patriot Rd Northfield, MN 55057	Electronic Service	No	OFF_SL_15-1033_Official Service List
Janet	Shaddix Elling	jshaddix@janetshaddix.co m	Shaddix And Associates	7400 Lyndale Ave S Ste 190 Richfield, MN 55423	Electronic Service	Yes	OFF_SL_15-1033_Official Service List
Mrg	Simon	mrgsimon@mrenergy.com	Missouri River Energy Services	3724 W. Avera Drive P.O. Box 88920 Sioux Falls, SD 571098920	Electronic Service	No	OFF_SL_15-1033_Official Service List
William	Taylor	bill.taylor@williamgtaylor.co m	Taylor Law Firm	2921 E 57th St PO Box 10 , Sioux Falls SD	Electronic Service	No	OFF_SL_15-1033_Official Service List
Pat	Treseler	pat.jcplaw@comcast.net	Paulson Law Office LTD	4445 W 77th Street Suite 224 Edina, MN 55435	Electronic Service	No	OFF_SL_15-1033_Official Service List
Cam	Winton	cwinton@mnchamber.com	Minnesota Chamber of Commerce	400 Robert Street North Suite 1500 St. Paul, Minnesota 55101	Electronic Service	Yes	OFF_SL_15-1033_Official Service List

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service		OFF_SL_15-1033_Official Service List
Patrick	Zomer	Patrick.Zomer@lawmoss.c om	Moss & Barnett a Professional Association	150 S. 5th Street, #1200 Minneapolis, MN 55402	Electronic Service		OFF_SL_15-1033_Official Service List