215 South Cascade Street PO Box 496 Fergus Falls, Minnesota 56538-0496 218 739-8200 www.otpco.com (web site)



February 20, 2019

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

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

RE: In the Matter of the Application of Otter Tail Power Company for Authority to Increase Rates for Electric Service in the State of Minnesota

Docket No. E017/GR-15-1033

Letter

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) respectfully submits two attached customer letters to support of Joint Request to Reopen Order Approving Compliance Filing made by Otter Tail and the Minnesota Chamber of Commerce on March 30, 2018. The customer letters are responsive to the May 24, 2018 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) in the above referenced Docket. The customer letters address the impact of certain rate design elements at issue in the Joint Request.

Otter Tail has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA in the Attachments, which derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use (the "Protected Data"). The Protected Data is therefore "trade secret information" and "nonpublic data" under Minn. Stat. § 13.37. The information designated as trade secret is non-public information concerning the rates schedules under which the industrial customers takes service from Otter Tail and potential changes these customers may make to their electric service. This information is held in confidence by Otter Tail. The information has independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use.



Mr. Wolf February 20, 2019 Page 2

If you have any questions regarding this filing, please contact me at 218-739-8956 or at <a href="mailto:cstephenson@otpco.com">cstephenson@otpco.com</a>.

Sincerely,

/s/CARY STEPHENSON Cary Stephenson Associate General Counsel

jch Enclosures c: Service List By electronic filing Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101

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

Joint Request to Reopen Order Approving Compliance Filing

Dear Mr. Wolf:

This letter is provided by American Crystal Sugar in support of the Joint Request to Reopen Order Approving Compliance Filing (Joint Request) made by Otter Tail Power Company (Otter Tail) and the Minnesota Chamber of Commerce (Chamber) in Case No. E017/GR-15-1033.

[PROTECTED DATA BEGINS...
Otter Tail provides electric service to American Crystal Sugar facilities in or near Crookston,
Minnesota. American Crystal Sugar was served previously under

As we understand the Joint Request, it seeks to correct certain Large General Service rate design elements to align with a Large General Service Class Rate Design Agreement between Otter Tail and the Chamber in Case No. E017/GR-15-...PROTECTED DATA ENDS]

[PROTECTED DATA BEGINS...

In the case of American Crystal Sugar, we have experienced a rate increase that provides a significant financial incentive to move away from the

We

understand that the incentive may be at odds with the energy policy purposes of time differentials. Our practical concern, however, is the cost differential to the Company. We have not acted on incentives which involve a service voltage level change because we understand the issue will soon be corrected by the Joint Request. We respectfully request a timely correction as requested by the Joint Request making a change in service unnecessary.

...PROTECTED DATA ENDS

Sincerely,

Ryan Wall Factory Manager, ACSC (racket on February 2, 2019

Daniel P. Wolf Executive Secretary Minnesota Public Utilities Commission 121 7th Place East, Suite 350 St. Paul, MN 55101

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

Joint Request to Reopen Order Approving Compliance Filing

Dear Mr. Wolf:

This letter is provided by Norbord Minnesota in support of the Joint Request to Reopen Order Approving Compliance Filing (Joint Request) made by Otter Tail Power Company (Otter Tail) and the Minnesota Chamber of Commerce (Chamber) in Case No. E017/GR-15-1033.

[PROTECTED DATA BEGINS...

Otter Tail provides electric service to Norbord Minnesota facilities in or near Solway, Minnesota. Norbord Minnesota is currently served under

As we understand the Joint Request, it seeks to correct certain Large General Service rate design elements to align with a Large General Service Class Rate Design Agreement between Otter Tail and the Chamber in Case No. E017/GR-15-1033.

[PROTECTED DATA BEGINS... ....PROTECTED DATA ENDS]

In the case of Norbord Minnesota, we have experienced a rate increase that provides a significant financial incentive to move away from the

We understand that the incentive may be at odds with the energy policy purposes of time differentials. Our practical concern, however, is the cost differential to Norbord Minnesota. We have not acted on this incentive because we understand the issue will soon be corrected by the Joint Request. We respectfully request a timely correction as requested by the Joint Request making a change in service unnecessary.

...PROTECTED DATA ENDS

Sincerely,

Cameron Lewis

General Manager, Norbord Minnesota

4409 Northwood Rd NW

Solway, MN 56678

218-751-2023

## **CERTIFICATE OF SERVICE**

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

I, Jana Hrdlicka, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to the Office of Attorney General – Antitrust & Utilities Division and all other persons on the attached service lists by electronic service or by First Class mail.

Otter Tail Power Company Letter

Dated this 20th day of February, 2019

/s/ JANA HRDLICKA

Jana Hrdlicka Regulatory Filing Coordinator Otter Tail Power Company 215 South Cascade Street Fergus Falls MN 56537 (218) 739-8879

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_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
Remi	Engbers	remi.engbers@woodsfuller.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
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
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
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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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
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
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

First Name	Last Name	Email	Company Name	Address	Delivery Method	View Trade Secret	Service List Name
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
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 57108-450	Paper 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
Daniel P	Wolf	dan.wolf@state.mn.us	Public Utilities Commission	121 7th Place East Suite 350 St. Paul, MN 551012147	Electronic Service	Yes	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	Yes	OFF_SL_15-1033_Official Service List