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July 15, 2019



Daniel P. Wolf
Executive Secretary
Minnesota Public Utilities Commission
350 Metro Square Building
121 7th Place East
St. Paul, MN 55101-2147

**RE: In the Matter of the 2016-2017 and 2017-2018 Annual Automatic Adjustment Reports
Docket Nos. E999/AA-18-373, E999/AA-17-492
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail) hereby submits its Reply Comments in response to the Minnesota Department of Commerce, Division of Energy Resources (Department) Response Comments in the matter of the 2016-2017 (FYE17) and 2017-2018 (FYE18) Annual Automatic Adjustment Reports which the Department filed June 14, 2019.

On May 6, Otter Tail submitted Reply Comments to respond to the Department's request to provide actual 2018 generation maintenance expense information.

In their June 14, 2019 Response Comments, the Department recommended approval of Otter Tail's generation maintenance expense reporting and also restated their prior recommendations to the Commission to approve Otter Tail's FYE18 reporting: Section II Audit Report; Section III Compliance Items; MISO Day 1 reporting; MISO Day 2 reporting and allocations; Asset Based Margin Reporting; and, Ancillary Services Market Reporting.

On May 8, Otter Tail submitted a compliance filing for both FYE17 and FYE18 providing an analysis of the costs associated with self-commitment and self-scheduling of Otter Tail's generation facilities. The Department reviewed those compliance filings and recommended in their Response Comments that the Commission accept Otter Tail's compliance filings for the FYE17 and FYE18 reporting periods.

Otter Tail supports the Department's recommendations, as summarized above, and respectfully requests the Commission approve Otter Tail's annual reporting and associated compliance filings.

Otter Tail has electronically filed this document with the Minnesota Public Utilities Commission and is serving a copy on all persons on the Official Service List for this docket. A Certificate of Service is also enclosed.

Should you have any questions regarding this filing, please contact me at 218-739-8279 or stommerdahl@otpc.com.

Sincerely,

/s/ *STUART TOMMERDAHL*
Stuart Tommerdahl
Manager, Regulatory Administration

kaw
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

RE: In the Matter of the 2016-2017 and 2017-2018 Annual Automatic Adjustment Reports
Docket Nos. E999/AA-18-373, E999/AA-17-492

I, Kim Ward, 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 Letters of Availability to all other persons on the attached service list by electronic service or by first class mail.

Otter Tail Power Company
Reply Comments

Dated: July 15, 2019

/s/ KIM WARD

Kim Ward
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8268

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_18-373_AA-18-373
Derek	Bertsch	derek.bertsch@mrenergy.com	Missouri River Energy Services	3724 West Avera Drive PO Box 88920 Sioux Falls, SD 57109-8920	Electronic Service	No	OFF_SL_18-373_AA-18-373
Generic Notice	Commerce Attorneys	commerce.attorneys@ag.state.mn.us	Office of the Attorney General-DOC	445 Minnesota Street Suite 1800 St. Paul, MN 55101	Electronic Service	Yes	OFF_SL_18-373_AA-18-373
Ian	Dobson	residential.utilities@ag.state.mn.us	Office of the Attorney General-RUD	1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131	Electronic Service	Yes	OFF_SL_18-373_AA-18-373
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