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September 10, 2019

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

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

**RE: In the Matter of the Annual Filing of Cogeneration and Small Power Production rates
for Otter Tail Power Company
Docket No. E999/PR-19-09
Annual Rate Filing – Revised Schedules A and B**

Dear Mr. Wolf:

Per the Notice of Supplemental Comment Period, Issued August 30, 2019, Otter Tail submits its revised 2019 Cogeneration and Small Power Production filing. The revised filing only addresses revisions to Otter Tail's prior trade secret designations, and as such, there are no actual rate changes as none of the inputs and/or calculations have changed from our compliance filing made on March 22, 2019, *i.e.*, only certain trade secret designations have changed, not the rates, inputs or calculations themselves.

Consistent with Otter Tail's earlier filed comments and based on further review of the trade secret designations contained in its 2019 Cogeneration and Small Power Production filing, some of the trade secret designations in our initial January 18, 2019 filing have been determined as no longer having an actual or potential basis for competitive harm or deriving independent economic value. As such, Otter Tail now believes certain data and rate information in that initial filing no longer need to be treated with trade secret protection.

The trade secret protection revisions to our January 18, 2019 filing, which are now public, are itemized below:

Schedule A

Public: Column containing the most current year, (i.e. 2019 Rates). These are the rates paid to customers. Also, annual number of hours for the current and forecasted years.

Schedule B

Public: Subp. 4. Utility's overall average percentage of line losses due to distribution, transmission, and transformation of electric energy.¹

Subp. 5 The Averaged on Peak hours and Average Over All Hours.

Subp. 6 The Averaged on Peak hours and Average Over All Hours used to calculate the Net annual avoided capacity cost.

Please note that Otter Tail has marked the required schedules (Schedules A and B) on the not public document version of this filing with the caption **NOT PUBLIC DOCUMENT – NOT FOR PUBLIC DISCLOSURE**, according to Minn. Stat. § 13.37, subd. 1(b). This statute protects certain "government data," as that term is defined at Minn. Stat. § 13.02, subd. 7, from being disclosed by an administrative agency to the public. The information being supplied in these schedules is considered to be a "compilation" of data that (1) was supplied by Otter Tail, (2) is the subject of reasonable efforts by Otter Tail to maintain its secrecy, and (3) derives independent economic value, actual or potential, from not being generally known to or accessible to the public.

A Certificate of Service on all parties is also enclosed.

Should you have any questions regarding this filing, please contact me at 218-739-8595 or dprazak@otpc.com.

Sincerely,

/s/ DAVID G. PRAZAK
David G. Prazak
Supervisor, Pricing
Regulatory Administration

cjh
Enclosures
By electronic filing
c: Service List

¹ As described in our E999/PR-19-9 Reply Comments February 22, 2019, p 4.

Appendix C

Revised Schedule A and B

Minnesota Public Utilities Commission		
DOCKET NO. E999/PR-19-09	Reporting Period:	January 1 - December 31, 2018
Cogeneration and Small Power Production Tariff	Utility:	Otter Tail Power Co
Minn. Rules 7835.0500 Schedule A: Estimated Energy Costs		
<p>Schedule A must contain the estimated system average incremental energy costs by seasonal peak and off-peak periods for each of the next five years. For each seasonal period, system incremental energy costs must be averaged during system daily peak hours, system daily off-peak hours, and all hours in the season. The energy costs must be increased by a factor equal to 50 percent of the line losses shown in schedule B. Schedule A must describe in detail the method used to determine the on-peak and off-peak hours and seasonal periods and must show the resulting on-peak and off-peak and seasonal hours selected.</p>		
Please include all computation descriptions in Schedule G		

Estimated Marginal Energy Costs (\$/MWh)						
		2019	2020	2021	2022	2023
			[PROTECTED DATA BEGINS...]	[PROTECTED DATA BEGINS...]	[PROTECTED DATA BEGINS...]	[PROTECTED DATA BEGINS...]
Summer	On Peak	27.62				
	Off Peak	17.64				
	All Hours	23.73				
Winter	On Peak	29.10				
	Off Peak	19.93				
	All Hours	23.66				
Annual	On Peak	28.61				
	Off Peak	19.17				
	All Hours	23.68				
		...PROTECTED DATA ENDS]	...PROTECTED DATA ENDS]	...PROTECTED DATA ENDS]	...PROTECTED DATA ENDS]	...PROTECTED DATA ENDS]
Annual # hours on-peak:		4090	4104	4088	4090	4104
Description of season and on-peak and off-peak periods						
Summer:	THE PERIOD OF JUNE 1st THROUGH SEPTEMBER 30th.					
Winter:	THE PERIOD OF OCTOBER 1st THROUGH MAY 31st.					
On-peak period:	ON-PEAK PERIODS IN SUMMER INCLUDE THOSE HOURS ENDING 0900 TO 2300. (EXCLUSIVE OF WEEKENDS AND HOLIDAYS). ON-PEAK PERIODS IN WINTER INCLUDE THOSE HOURS ENDING 0800 TO 2300. (EXCLUSIVE OF WEEKENDS AND HOLIDAYS).					
Off-peak period:	ALL OTHER HOURS ARE OFF-PEAK.					

* INCLUDES 50% OF LINE LOSSES FROM SCHEDULE B

CERTIFICATE OF SERVICE

**RE: In the Matter of the Annual Filing of Cogeneration and Small Power Production Rates for Otter Tail Power Company
Docket No. E999/PR-19-09**

I, Carly Haiby, 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 all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Annual Filing**

Dated this 10th day of **September, 2019**

/s/ Carly Haiby
Carly Haiby, Regulatory Filings Coordinator
Otter Tail Power Company
215 South Cascade Street
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(218) 739-8472

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