

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

June 18, 2020



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

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of a
Transfer of Property
Docket No. E017/PA-19-533
Response**

Dear Mr. Seuffert:

This letter responds to the Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) filed on June 12, 2020 where the Department recommends that the Commission approve Otter Tail Power Company's (Otter Tail) Petition to acquire certain transmission assets from Central Power Electric Cooperative (CPEC) pursuant to Minnesota Statute §216B.50 and Minnesota Rules 7825.1700 and 7825.1800.

Otter Tail supports the Department's recommendation and seeks Commission approval of the acquisition of the CPEC substation facilities and substation-related assets located in north-central North Dakota. As explained in the Petition, Otter Tail customers stand to receive significant benefits from the proposed acquisition of the CPEC assets, including operational efficiencies from reducing Otter Tail's reliance on and entanglement with CPEC's operation of the assets as well as financial relief from Southwest Power Pool charges.

Otter Tail also supports the Department's recommendation to issue a waiver of certain relevant information called for by Minnesota Rule 7825.1400 for items F, H, I, and J.

Finally, Otter Tail supports the Department's proposal to submit final journal entries supporting the final purchase in a compliance filing within 60 days after the closing of the transaction.

Otter Tail looks forward to the Commission's expeditious handling of this matter to facilitate final closing of the transaction.

Please contact me at 218-739-8956 or cstephenson@otpc.com if you have any questions regarding this filing.

Very truly yours,

/s/ Cary Stephenson
Cary Stephenson
Associate General Counsel

Enclosures
kaw
By electronic filing
cc: Service List