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December 5, 2016



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Mr. 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 Otter Tail Power Company’s 2017-2031 Resource Plan
Docket No. E017/RP-16-386
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (“Otter Tail”) respectfully submits these Reply Comments to the Minnesota Public Utilities Commission (“Commission”) in the above-referenced docket.

Otter Tail has electronically filed this document with the Commission and is serving a copy on all persons on the official service list for this docket. A Certificate of Service is also enclosed.

If you have any questions regarding this filing, please contact me at bhdraxten@otpc.com or (218) 739-8417.

Sincerely,

/s/ BRIAN DRAXTEN
Brian Draxten
Manager, Resource Planning

kaw
Enclosures
By electronic filing
c: Service List

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STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION

In the Matter of Otter Tail Power
Company's 2017-2031 Integrated
Resource Plan

Docket No. E017/RP-16-386

OTTER TAIL POWER COMPANY
REPLY COMMENTS

I. INTRODUCTION

Otter Tail Power Company (Otter Tail or Company) submits these Reply Comments in response to the October 5, 2016 Comments of the Minnesota Department of Commerce, Division of Energy Resources (Department) and the Clean Energy Organizations, *et al.* (CEO), filed in the above-captioned docket.

As described in greater detail in these Reply Comments, this Integrated Resource Plan reflects progress Otter Tail has made on the 2014-2028 resource plan approved by the Commission in Otter Tail's most recent resource plan proceeding.¹ In that previous proceeding, several material commitments were made that will dramatically change Otter Tail's resource mix to one that is much more balanced. They include the near-term retirement and replacement of the Hoot Lake Generating Plant and the addition of substantial wind and solar resources. Since the approval of that resource plan, Otter Tail has taken important steps necessary to execute on the plan. Because of the relatively short time frames by which these resource changes will be made, the progress Otter Tail has made has been important to the successful execution of the plan. Specifically, Otter Tail has made critical progress on the natural gas combustion turbine project and the 150 MW wind project, which are both described in greater detail in these Reply Comments, so that these resources are available when Hoot Lake Plant is retired and so that Otter Tail can take full advantage of Production Tax Credits. This plan is cost effective, and it

¹ December 5, 2014 ORDER APPROVING PLAN WITH MODIFICATIONS AND SETTING REQUIREMENTS FOR NEXT RESOURCE PLAN, MPUC Docket No. E017/RP-13-961.

meets Minnesota's renewable energy and greenhouse house gas reduction goals. (A detailed description of GHG reduction goal attainment in included on pages 8-10 of this document.) It also strengthens system reliability in the area, and we believe it meets the regulatory requirements and philosophies of the three jurisdictions served by Otter Tail. For these reasons, Otter Tail requests approval of the plan.

II. BACKGROUND ON OTTER TAIL

Otter Tail has several characteristics that provide important context for its resource planning activities:

1. Otter Tail is a very small utility.

Otter Tail is very small in terms of number of retail customers, units sold and retail revenues generated. The Company is one of the smallest publicly held investor owned utilities in the United States. While our service territory spans about 30 percent of the state, we serve only about four percent of the Minnesota electric customers served by investor owned utilities. Based on Summer Season peak demand, Otter Tail (717 MW)² is roughly eight percent of the size of Xcel Energy (Xcel) (9,524 MW)³. Therefore, adding 150 MW of wind generation for Otter Tail is comparable to Xcel adding 1,875 MW of wind. Adding 30 MW of solar generation for Otter Tail is comparable to Xcel adding 375 MW of solar.

2. Otter Tail's service territory is very sparsely populated and rural.

Otter Tail serves a very rural service territory with only three towns having a population greater than 10,000 people (Fergus Falls, Bemidji and Jamestown, ND). Over 90 percent of our customers live in towns with populations under 1,000. These small, rural communities tend to have lower household incomes and an older average age than larger metropolitan areas in Minnesota.

² Otter Tail's 2014 Minnesota Electric Utility Information Reporting – Forecast Section

³ Xcel's 2014 Minnesota Electric Utility Information Reporting – Forecast Section

3. Otter Tail serves three jurisdictions.

Otter Tail has approximately 50 percent of its load in Minnesota, 40 percent in North Dakota, and 10 percent in South Dakota. The regulatory policies of these states vary widely. To date, Otter Tail has added resources that are deemed cost effective in all three states. Otter Tail believes its strategy of implementing new resources in a cost effective, reliable manner allows its system to remain integrated and is in the best interest of all its customers. The Company believes that this current resource plan supports a preferred plan that is likely to be acceptable in all three jurisdictions that it serves. In order to keep costs as low as possible for all of its customers, it is vital that Otter Tail continues to operate as a single, integrated system with a single generation resource mix.

III. PREFERRED PLAN SUMMARY

A. Background

Otter Tail has submitted a preferred plan that carries out the Commission's order in our last resource plan. Otter Tail agrees to include two changes to its preferred plan, namely using a 1.6 percent energy efficiency goal as recommended by the Department and including an additional 100 MW of wind in the 2022-2023 timeframe, if cost-effective and consistent with reliable system operation. This plan accomplishes the following:

1. It is the same as the Department's preferred plan (5-year plan).
2. It meets Minnesota's Renewable Energy Standard and Greenhouse Gas Reduction Goal during the study period (modified assumptions – see section G below).
3. It replaces Hoot Lake with significantly cleaner generation consisting of a natural gas combustion turbine and wind energy.
4. It diversifies Otter Tail's generation away from coal to more wind and natural gas, giving the Company a much more balanced generation mix.

In its Order concerning Otter Tail's initial resource plan filing in 1992, the Commission stated that it considers the characteristics of the available resource options and the proposed plan as a whole. In Minnesota Administrative Rules, Chapter 7843.0500, Subp.3, it states that "Resource options and resource plans must be evaluated on their ability to:

- A. maintain or improve the adequacy and reliability of utility service.

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- B. keep the customer's bills and the utility's rates as low as practicable, given regulatory and other constraints.
- C. minimize adverse socio-economic effects and adverse effects upon the environment.
- D. enhance the utility's ability to respond to changes in the financial, social, and technological factors affecting its operations.
- E. limit the risk of adverse effects on the utility and its customers from financial, social, and technological factors that the utility cannot control.”

Otter Tail has incorporated these objectives into this resource plan. Otter Tail has continued to operate its existing facilities as efficiently and economically as possible, which has helped to maintain the reliability of the electric system and keep Otter Tail’s rates low. The plan is designed to reduce the financial risks of future environmental regulation or taxes, to reduce adverse socio-economic effects and effects on the environment, and to position the Company to respond to change. This resource plan evaluates a blend of supply-side and demand-side resource options to meet customer needs that cannot be met with existing resources.

B. Stakeholder groups

Before the current resource plan was filed with the Commission, Otter Tail convened stakeholder group meetings. We attempted to get parties having similar positions grouped together for these meetings. The thought was that each meeting could be more productive when the parties had comparable positions. Many of the meetings were held in Fergus Falls, Minnesota. We felt it was important to have parties to our proceeding actually see our service territory and understand some of the differences between Otter Tail and utilities that serve larger metropolitan areas. It is our view this process was productive. Because of it, Otter Tail included in our original filing additional Strategist modeling runs that had been requested by the parties. The stakeholder meetings informed the resource plan that was filed.

C. The Department’s position

The Department’s Strategist modeling recommends a five-year action plan that is the same as Otter Tail’s five-year action plan⁴ (See Table 1 below.). In addition, the Department recommends that Otter Tail add an additional 100 MW to 200 MW of wind in the 2022 to 2023

⁴ Comments of the DOC-DER, October 5, 2016, page 44.

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timeframe.⁵ The CEO's also recommend that the Company add an additional 200 MW of wind generation in the 2022 to 2023 timeframe.⁶ This addition to the plan would increase Otter Tail's authority to add wind generation by at least 150 MW over and above the 150 MW that Otter Tail announced in November 2016. The Company accepts this recommendation up to the 100 MW recommended by the Department, and also with the understanding that additional resources will be subject to the condition that they must be cost-effective and won't result in any system reliability issues. These conditions are the same as the conditions the Commission included in Otter Tail's last IRP Order for wind additions authorized at that time.⁷ This brings the total wind addition in this plan to 300 MW, which is the amount authorized in our last resource plan filing⁸. In Otter Tail's next resource plan, which we would expect to file by December 1, 2018, the five-year action plan will reach out to the years 2022 and 2023, and therefore these additional wind amounts will be evaluated again in that proceeding.

⁵ Comments of the DOC-DER, October 5, 2016, page 27.

⁶ Clean Energy Organizations Initial Comments, October 5, 2016, page 40.

⁷ December 5, 2014 Order in OTP's most recent resource plan, Docket No. E017/RP-13-961; these recommended conditions were also included in Otter Tail's introduction to the current Application for Resource Plan Approval 2017-2031, Resource Plan Summary 2-2.

⁸ December 5, 2014 ORDER APPROVING PLAN WITH MODIFICATIONS AND SETTING REQUIREMENTS FOR NEXT RESOURCE PLAN, MPUC Docket No. E017/RP-13-961, page 11.

Table 1

2013 Resource Plan Order	OTP's Current Preferred Resource Plan	Department's Recommended 5-year plan
Otter Tail shall obtain approx. 200 MW , subject to need, of intermediate capacity (and assoc. energy) in the 2019-2021 timeframe	Add a 248 MW simple-cycle natural gas combustion turbine in 2021 (energy to come from wind addition described below)	250 MW of peaking capacity in 2021
Otter Tail is authorized to obtain up to 300 MW of wind in the 2017-2021 timeframe if cost-effective and to the extent consistent with reliable system operation	Add 100 MW of wind in 2018 Add 100 MW of wind in 2020 Additional authority up to a total of 300 MW, provided cost effective and to the extent consistent with reliable system operation	Add 200 MW wind in 2018 to 2020 timeframe
Otter Tail shall is authorized to add enough solar to comply with Minnesota's SES	Add 30 MW solar by 2020 to comply with Minnesota's SES	Add 30 MW of solar in about 2020
	Include 1.6% energy efficiency	Achieve average annual energy savings of 46.8 GWh (1.6% of retail sales)

D. The CEO's position

The CEO's question whether renewable resources could be the replacement for Hoot Lake Plant, without the addition of a simple cycle gas plant. They also argue that the Company does not achieve all cost effective energy savings, has overestimated its load forecast, and does not account for environmental compliance risk with its coal plants located in North Dakota and South Dakota. Otter Tail disagrees with the CEO.

A dispatchable simple cycle gas plant is required to cost effectively retire Hoot Lake Plant and replace expiring capacity purchases. Also, the Commission authorized Otter Tail in our last IRP proceeding to move ahead to replace Hoot Lake Plant and to secure an intermediate resource, namely a natural gas and wind combination. The Company has already made important progress moving ahead with that plan, and that progress has been necessary to replace Hoot Lake as scheduled. It would be detrimental for our customers and to system reliability to reverse course on that plan.

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On the other issues raised by the CEO, our initial Petition supports our approach on each of these issues. Also, the Department's analysis provides additional independent support for Otter Tail's approach to these issues. The Department's analysis supports the level of energy efficiency included in our plan. The Department also had no significant issues with our load forecast, and the Department found that Otter Tail has adequately evaluated its environmental regulations and Clean Power Plan compliance.

E. Hoot Lake Plant Retirement/Replacement

As agreed to in Otter Tail's most recent IRP dockets, Hoot Lake Plant is scheduled for retirement at the end of the 2020 MISO Planning Year (on May 31, 2021). At this time, Otter Tail will have no coal generation in Minnesota. Its only significant thermal generation in Minnesota will be a natural gas combustion turbine at Solway, near Bemidji, Minnesota. Otter Tail is replacing Hoot Lake's capacity and energy with a natural gas combustion turbine and additional wind energy.

1. Natural Gas Combustion Turbine

Otter Tail has purchased land near **[NOT PUBLIC DATA BEGINS...**

... NOT PUBLIC DATA

ENDS]. This provides robust electric and natural gas transmission to the site and avoids the additional cost of building lateral natural gas and/or electric transmission lines. Additionally, this dispatchable resource will help to provide dispatch flexibility and reliability of service in an area with a heavy saturation of intermittent renewable generation.

With greater penetration of intermittent renewable generation in our region, it will be beneficial for electrical system operations for Otter Tail to have in its resource mix its existing base-load generation resources and the new combustion turbine at **[NOT PUBLIC DATA BEGINS... ... NOT PUBLIC DATA ENDS]**. The existing baseload units respond to real-time grid system needs with significant spinning inertia and primary frequency response; the new combustion turbine will increase our capability to bring generation on and off-line quickly in order to provide energy imbalance, regulation and load following, and to serve as an economic hedge for customers when wind is not blowing and market prices are high.

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An interconnection request for this generation addition was filed on November 16, 2015 and is currently in the MISO interconnection process. On October 3, 2016, a Request for Proposal (RFP) was sent out for a “Combustion Turbine Preliminary Engineering and Permitting Support” project with work expected to begin in January 2017. Otter Tail has engaged two engineering firms for the project. Continued progress on the project is critical in order to achieve commercial operation prior to the retirement of Hoot Lake Plant. Preliminary engineering and permitting approvals are scheduled for two years, 2017 – 2018. Once permitting and approvals are granted, there is a 27 month timeline for engineering, procurement and construction (2019 – April 2021).

2. Wind

On November 16, 2016, Otter Tail announced it had signed definitive agreements with EDF for development of a 150 MW wind energy facility located in southeastern North Dakota. The expected commercial operation date of the project is late 2019. This will increase Otter Tail’s renewable energy percentage to about 28 percent of total retail energy (system wide). The MISO queue presents challenges for all new interconnecting projects, and Otter Tail and EDF are monitoring the progress of the queue and analyzing possible results. The Company will also continue to seek out an additional 50-150 MW of wind energy in the 2020-2023 timeframe, as described in these Reply Comments.

F. Solar

Otter Tail is currently in discussions with several solar developers on a 25-30 MW solar generation project, most likely located in Minnesota, with a commercial operation date no later than the end of 2019. If a cost-effective solar project cannot be obtained, the Company will explore meeting Minnesota’s Solar Energy Standard by purchasing qualifying solar renewable energy credits through MRETS.

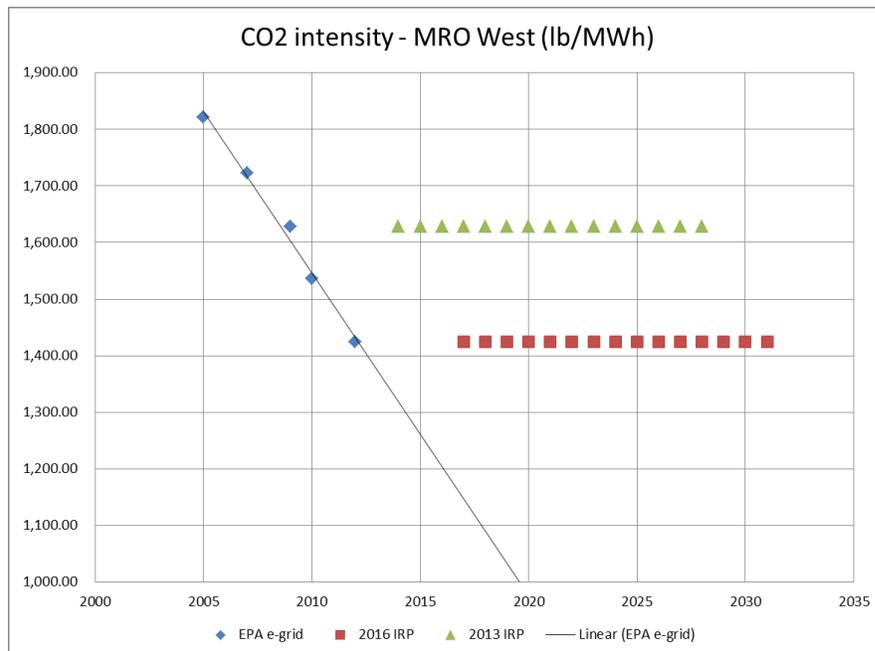
While it won’t have a significant impact on this resource plan, Minnesota’s Solar Energy Standard (SES) requires utilities to get 10 percent of their 1.5 percent solar mandate from small systems under 20 kW. For Otter Tail, the small solar portion will amount to 2.5 to 3 MW. In our service territory, we are seeing a low interest in small solar systems from our customers. The small solar portion of the SES seems to be the most challenging for Otter Tail. Otter Tail will provide updates on its progress its annual RES/SES report.

G. Minnesota’s Greenhouse Gas (GHG) Reduction Goal

Otter Tail’s Preferred Plan meets Minnesota’s GHG reduction goals through 2024, using the original IRP assumptions. In 2025, the reduction goal increases to 30 percent at which point Otter Tail’s preferred plan would appear not to reach the GHG reduction goal, using the base case assumptions. However, as described more fully below, based on reasonable operational expectations, OTP’s plan will likely achieve the GHG reduction goal through the entire study period (through 2031).

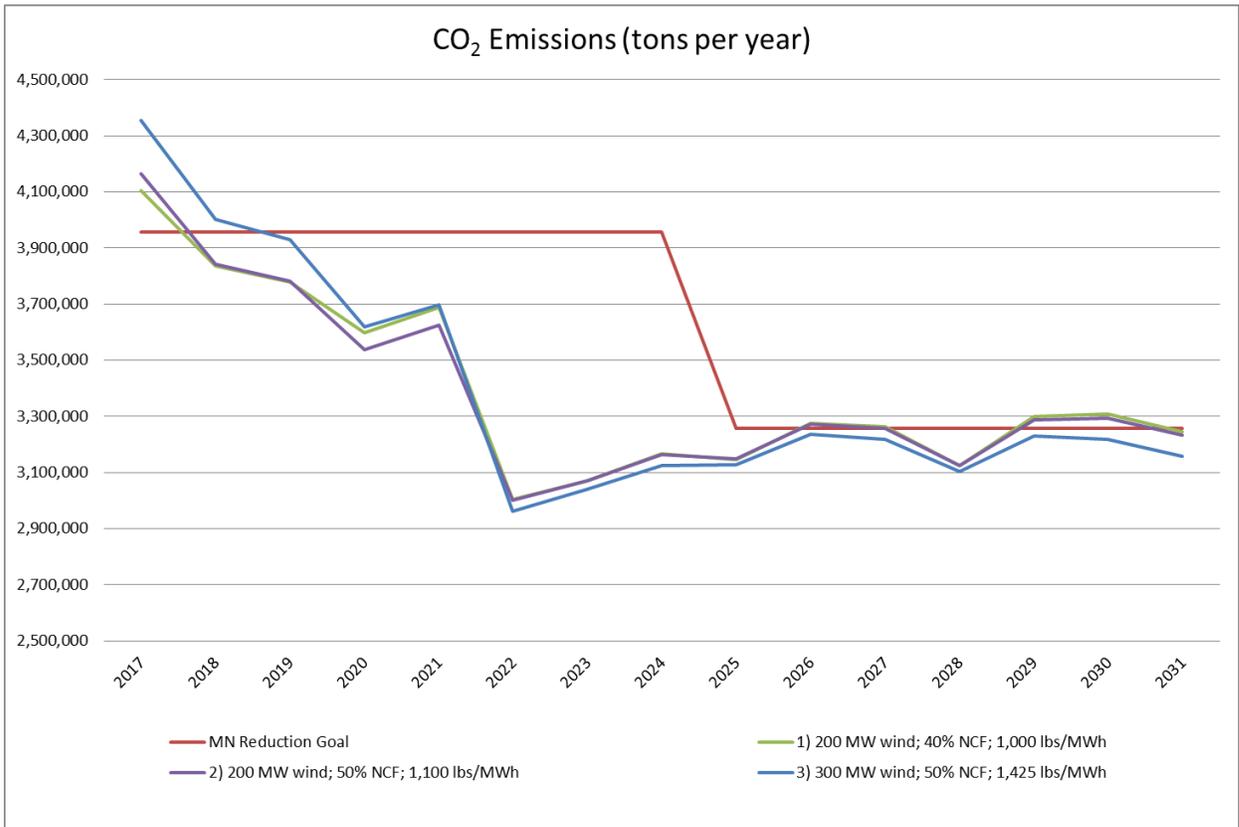
There are three key assumptions that impact the GHG compliance calculation for Otter Tail: 1) the CO₂ intensity for energy market purchases, 2) the Net Capacity Factor (NCF) for new wind additions, and 3) the amount of installed wind capacity. The following three scenarios describe how OTP will likely meet the 2025 GHG reduction goal:

- 1) The CO₂ intensity assumed for market energy purchases for the entire study period in this resource plan is 1,425 lbs/MWh (based on EPA 2012 e-Grid values for the MRO West region). The figure below shows the CO₂ intensity values for the MRO West region from 2005 to 2012 (the most recent published values). The CO₂ intensity for the MRO West region dropped 22 percent from 2005 to 2012. Otter Tail expects the downward trend in CO₂ intensity to continue. If the CO₂ intensity were to drop below 1,000 lbs/MWh by 2025, Otter Tail’s preferred plan would meet the GHG reduction goal through the entire study period (through 2031). Based on the information reflected in the chart below, attaining a 1,000 lbs. / MWh CO₂ intensity by 2025 is attainable.



- 2) Otter Tail used a 40 percent NCF for new wind resource additions in the IRP. It’s likely that the NCF for new wind resources will be in excess of 50 percent. If the new wind resource additions achieved 50 percent NCF and the CO2 intensity for purchases dropped to only 1,100 lbs/MWh by 2025, Otter Tail’s Preferred plan would meet the GHG reduction goal through the entire study period (through 2031).
- 3) Assuming Otter Tail is authorized to add 150 MW of wind beyond the recently announced EDF project in the 2020-2023 timeframe (conditioned on it being cost effective and consistent with reliable system operations), the Company would exceed Minnesota’s GHG reduction goal through the entire study period (through 2031) if the incremental wind had a capacity factor of 50% (and even if the CO2 intensity for purchases remained at the original IRP assumption—1425lb/MWh, which is not expected, as described above).

The chart below demonstrates how Otter Tail reasonably could expect to meet the GHG reduction goal with its resource plan as discussed above.



IV. DEPARTMENT OF COMMERCE COMMENTS

A. The Department's questions on Otter Tail's sales forecasting have been resolved

Otter Tail and the Department have resolved any concerns the Department had with Otter Tail's sales forecast. In Otter Tail's current rate case, Docket No. E017/GR-15-1033, the Department made several recommendations regarding Otter Tail's load forecast. Otter Tail agreed with several of the recommendations, and we will incorporate changes in future sales forecasts in response to those recommendations. There were some recommendations with which Otter Tail does not necessarily agree. These issues are a matter of differing modeling methodologies will require further discussions with the Department in the future.

In Otter Tail's forecast in the rate case, the difference between the Department's forecast and Otter Tail's forecast were very small. As recommended by the Department, we have re-run the original forecast in the resource plan with the following changes:

- Adjustment to weather inputs including supplying the missing weather data, including only the weather-sensitive loads to determine weighting calculations, and using five years of historical data to weight the weather stations;
- Including a binary variable for each year;
- Including a trend line as recommended by the Department;
- Including ARMA errors where recommended by the Department.

(Note: Including these adjustments does not necessarily indicate agreement with all of the adjustments.)

The results show that the forecast changed by less than one-half of one percent in each year of the study period. Otter Tail also included a "Low Load Growth"⁹ sensitivity and a "High Load Growth"¹⁰ sensitivity. These sensitivities were approximately ± 8.6 percent. Therefore, the forecasting changes recommended by the Department had very little impact and the resulting forecast was well within the high and low sensitivity bounds included in the resource plan. Also, the resource selection in Sensitivities 14 and 15 are virtually the same as the preferred plan.

⁹ Otter Tail Resource plan filing, Docket No. E017/RP-16-386, Appendix I, Sensitivity 14.

¹⁰ Otter Tail Resource plan filing, Docket No. E017/RP-16-386, Appendix I, Sensitivity 15.

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The Department requested that Otter Tail “provide a detailed discussion explaining why it projects a significant decrease in demand in this IRP filing relative to its last IRP filing.”¹¹ The demand forecast in the current resource plan is actually slightly higher than in the last resource plan. After a phone conversation with Department staff, they discovered that their calculation was in error and based on using incorrect values from the last resource plan. Otter Tail and the Department have agreed that Otter Tail’s demand forecast showed a slight increase over the last resource plan and that this is no longer an issue.

The Department also requested that Otter Tail “fully explain the loss figure in the Petition’s Appendix B and discuss what, if any, differences exist between this figure and the figure used in the Company’s IRP forecast.” The Company developed a total system MWh sales forecast. A monthly loss factor was applied to convert MWh sales to MWh native energy requirements. This is the same loss factor used in the Company’s resource plan.

In summary, all load forecasting issues raised by the Department have been addressed and resolved.

B. Otter Tail agrees to 1.6 percent energy efficiency as recommended by the Department

Otter Tail originally filed this resource plan including a 1.5 percent energy efficiency level. In its response to Department Information Request No. 6, the Company agreed to use a 1.6 percent energy efficiency level. In the Department’s Comments, they concluded that “This level of energy savings is the most cost effective; and although the Department concludes that the DSM scenario is aggressive, Otter Tail is planning on spending an average of 131 percent more per kWh to achieve the energy savings.”¹²

Additionally, pipeline sales account for a very large percentage of Otter Tail’s load. However, these customers have been unable to participate in the Company’s CIP programs for various reasons. The result of this limitation is that Otter Tail has had to achieve enough energy efficiency savings through programs suited to other customers to cover the sales to pipeline customers. If sales to pipeline customers were left out of the denominator of the calculation of the savings to reflect their limitations, Otter Tail would achieve energy savings of 2.31 percent to

¹¹ Comments of the Minnesota department of Commerce – Division of Energy Resources, Docket No. E017/RP-16-386, page 11.

¹² October 5, 2016 Comments of the Minnesota Department of Commerce, Division of Energy Resources, page 21.

2.74 percent.¹³ This far surpasses the recommendation of the CEO's for Otter Tail to be required to use a 2.0 percent energy savings goal.

C. Otter Tail agrees with the Department's assessment of supply side resources

The Department concludes that Otter Tail's expansion plan should include:

- 200 MW of wind in the 2018 to 2020 timeframe;
- 30 MW of solar in 2020;
- 250 MW of peaking capacity in 2021, and;
- 100-200 MW of wind in the 2022 to 2023 timeframe;
- Include 1.6 percent energy efficiency level.

The Company agrees with this assessment. Otter Tail has made significant progress developing its 248 MW natural gas combustion turbine project. It has recently signed a definitive agreement to acquire 150 MW of wind in 2019. And as described above, the Company agrees the Commission should authorize an additional 150 MW in the 2020-2023 timeframe, with the condition that the addition should be cost-effective and consistent with reliable system operation.

As explained earlier in these Reply Comments, Otter Tail is currently working with various solar developers to see if it can arrive at reasonable terms for a utility-scale solar project of approximately 25 MW¹⁴ to be constructed during 2019, which would allow us to meet Minnesota's Solar Energy Standard.

D. The Department's analysis shows Otter Tail is compliant with the Minnesota Renewable Energy Standard

The Department's analysis of Otter Tail's compliance with Minnesota's Renewable Energy Standard shows that with the addition of 100 MW of wind in 2018 and 100 MW of wind in 2020, the Company should be able to meet its RES requirements through 2028. Since both North Dakota and South Dakota have 10 percent renewable energy objectives, beginning in 2029, Otter Tail can meet its Minnesota RES requirements using excess RECs that would otherwise be allocable to North Dakota and South Dakota.

¹³ Otter Tail Power Company Initial Resource Plan filing, Docket No. E017/RP-16-386, Appendix J, Page 5, Table E-2.

¹⁴ Our original resource plan filing assumed 30 MW of solar would be required to meet Minnesota's SES. However, as solar generation becomes more efficient, Otter Tail believes it could meet the SES with 25 MW of solar generation.

E. The Department’s analysis shows Otter Tail is adequately tracking environmental regulations, including the Clean Power Plan

Otter Tail agrees with the Department’s assessment that the Company is adequately tracking environmental regulations that might impact its operations.

F. It is very likely Otter Tail will exceed Minnesota greenhouse gas (GHG) emissions reduction goal through the entire study period (through 2031)

Assuming Otter Tail is authorized to add an additional 150 MW of wind in the 2020-2023 timeframe (conditioned on it being cost effective and content with reliable system operations), as described above, it is very likely the Company will exceed Minnesota’s GHG reduction goal through the entire study period (through 2031).

V. CLEAN ENERGY ORGANIZATIONS (CEO) COMMENTS

In June 2016, Ceres, Inc., in partnership with Clean Edge, Inc., published a report titled “Benchmarking Utility Clean Energy Deployment: 2016, Ranking 30 of the Largest U.S. Investor-Owned Electric Utilities on Renewable Energy & Energy Efficiency.” The study ranked these utilities based on renewable energy sales as a percent of 2014 retail electric sales. The ranking was as follows:

1.	Sempra Energy	36.45%
2.	PG&E	25.90%
3.	Edison International	23.15%
4.	Xcel Energy	20.63%
5.	PSEG	13.28%

Obviously, Otter Tail does not make the list because it is not one of the thirty largest investor-owned utilities in the United States. However, if we had been included, our current renewable energy percentage of approximately 19 percent would have put us in fifth place nationally just behind Xcel Energy. After the recently-announced 150 MW wind addition, the Company renewable percentage will rise to about 28 percent, putting Otter Tail in second place. If the additional 150 MW of wind in the 2022-23 timeframe are added plus the additional 25 MW of solar generation in 2019, Otter Tail’s renewable percentage would increase to approximately 38%.

Otter Tail has been, and will continue to be, among the leaders in renewable energy deployment in the United States. In their Comments, the CEO question the “speed and scale of Otter Tail’s planned renewable energy investments.” Based on Otter Tail’s achievements and the ranking above, it would seem difficult to make that challenge. Otter Tail’s preferred plan as discussed in section III (G) above, can reasonably be expected to meet Minnesota’s GHG Reduction goal and does so as part of a least cost plan.

A. Hoot Lake Replacement

The CEO also argues that “A centerpiece of Otter Tail’s IRP is its proposal to replace its retiring 128 MW coal-fired generators at Hoot Lake with a 248 MW CT plant.” This is an incorrect assertion. In our plan we are reflecting replacement for Hoot Lake Plant and an expiring 50 MW bilateral capacity purchase, and our replacement plan is a combination of a 248 MW natural gas CT and 200 MW of wind energy.

Hoot Lake is a baseload generator that provides both capacity and energy. Retiring the plant requires us to replace both the capacity and energy that the plant provided. The main function of the 248 MW natural gas CT is to provide capacity and a small amount of energy at times of high prices and to balance intermittent renewable generation. The bulk of the replacement energy for the retired Hoot Lake Plant will come from the wind addition. While these two projects are not at the same location, they are geographically close to each other and will work in harmony in our resource mix to supply our customer’s capacity and energy requirements. Otter Tail argues that this is essentially a renewable replacement for Hoot Lake Plant’s capacity and energy.

In Otter Tail’s last resource plan docket, the Staff Briefing Papers dated September 10, 2015¹⁵ (just over one year ago) state the following:

“On the Hoot Lake Plant replacement issue, certainly more detail is preferred over less detail, especially since the Hoot Lake Plant replacement has been a focus of the Commission’s prior orders since the Company’s 2010 IRP. The Commission’s most recent Order in Otter Tail’s 2013 IRP made a size, type, and timing finding for the replacement acquisition—a combination of wind and natural gas—based on what the Commission determined...”¹⁶

¹⁵ These Staff Briefing papers address Otter Tail’s request for extension for the filing of the current resource plan. Since a new docket number had not yet been assigned, the previous resource plan docket number was used.

¹⁶ Staff Briefing Papers for Docket No. E017/RP-13-961 dated September 10, 2015, Page 4.

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This is clear direction on what would be an acceptable replacement acquisition for Hoot Lake. The briefing papers also stated the desire for “more detail” on planning for Hoot Lake’s replacement. This resource plan provides a very detailed plan including size, type, timing, and even a specific location. In fact, important work necessary for meeting the project schedule has already been completed.

Also in Otter Tail’s last resource plan, the October 15, 2014, Staff Briefing Papers discuss the possible Hoot Lake replacement resources.¹⁷ At no point is there any discussion regarding replacement of a base load generation facility totally with renewable generation. The entire discussion focuses on combined cycle versus simple cycle and how much wind energy was required along with the natural gas generation selection. In its Comments in this proceeding, the CEO argues that the Commission’s use of the term “intermediate capacity” in the Order approving Otter Tail’s resource plan is not clear and suggests that non-dispatchable resources might fit the definition. Otter Tail disagrees. Functioning alone, non-dispatchable units cannot reasonably fit the definition of “intermediate capacity.”

The term intermediate capacity is used in our industry to mean those generation resources that serve resource needs between base load and peaking resources.¹⁸ This is not just a matter of semantics. The function of intermediate generation resources is to fill in for load increases above available baseload units that are likely to persist longer than peaking generation can cost effectively accommodate. The term intermediate generation is often used synonymously with “load following generation,” and in order for a generating unit to provide intermediate generation, or load following generation, it must be a dispatchable resource that can be varied intentionally to follow changes in load as it rises and falls. Otter Tail is retiring and replacing the Hoot Lake Plant, which has met our customers’ baseload needs during its lifetime. More recently, the unit has served as a seasonal baseload unit due to market conditions. Because the unit is a dispatchable resource, Otter Tail has been able to rely on the unit to follow load for system reliability and to protect customers against high market prices. To replace the unit and reduce the base load generation available to meet our customers’ requirements, Otter Tail requires similar load following capabilities and protection against market forces that cannot be

¹⁷ Staff Briefing Papers for Docket No. E017/RP-13-961 filed on October 15, 2014, Pages 40-41, Point C.

¹⁸ See, e.g. “Electric generators’ roles vary due to daily and seasonal variation in demand,” published by the U.S. Energy Information Administration, June 8, 2011, available at <http://www.eia.gov/todayinenergy/detail.php?id=1710>.

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accomplished with non-dispatchable resources. This is especially important as Otter Tail adds more wind to its system and more wind is added to the system in this region. As indicated above, Otter Tail will increase the percentage of wind energy for retail up to 28% with its recently announced 150 MW addition, and up to 38% with the additional authority we have requested. While the analysis in our last resource plan and in this one shows we can meet our identified intermediate generation requirements through a wind/simple cycle solution (in lieu of a combined cycle unit, for example), these requirements cannot be met just by non-dispatchable resources as the CEO suggests.

In the Final Order in the last Resource Plan, there is a discussion of the size, type, and timing of the capacity addition and each party's position. Following is the position of the CEO in that Final Order:

“The Environmental Intervenors argued that the Commission should require Otter Tail to modify its short-term action plan to take the steps necessary to achieve greenhouse-gas emissions reduction goals, including adding 300 MW of wind by 2019.

The Environmental Intervenors noted that Otter Tail modeled a scenario that would achieve full compliance with the greenhouse-gas reduction goals by adding 300 MW of wind in the first five years of the planning period. According to the Environmental Intervenors, this scenario costs only 0.8% more than Otter Tail's preferred plan if externality costs are attached to power-plant emissions. The Environmental Intervenors argued that Otter Tail should be required to select a plan that aims to attain greenhouse-gas emissions reduction goals or demonstrate why compliance is either technically infeasible or not in the public interest.”¹⁹

In that docket, the CEO did not raise concern over replacing Hoot Lake with a natural gas and wind combination but rather focused all of their concern on Otter Tail's not meeting Minnesota's Greenhouse Gas Reduction goal. As stated in these Reply Comments, Otter Tail has agreed with the Department and CEO to include up to an additional 100 MW of wind over the 200 MW of wind appearing in 2018 and 2020 which allows the Company to meet its greenhouse gas reductions goal through the study period.

Otter Tail has relied on the direction received from this Commission in Otter Tail's last resource plan and is proceeding with the simple cycle natural gas combustion turbine project and wind additions as ordered by this Commission. The timeline of both of these projects is critical to take full advantage of the Production Tax Credit and to have the replacement units operational

¹⁹ Docket No. E017/RP-13-961, Order Approving Plan With Modifications and Setting Requirements for the Next Resource Plan, pages 5-6, A. Size, Type, and Timing of Capacity Addition; Wind Resource Additions, 1. The Position of the Parties, page 6.

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prior to the retiring of Hoot Lake Plant. Delaying Otter Tail's 248 MW CT project is not a reasonable option.

B. Energy Savings

The CEO also states that Otter Tail has not achieved all cost effective energy savings. While the Company acknowledges that up to 1.8 percent yields a NPVRR in Strategist modeling that is lower than the preferred plan, Otter Tail agrees with the statement of the Department: "The Department's policy is to recommend that the Commission approve the amount of DSM that results in the lowest PVSC over the planning period, so long as achievement of the energy savings appears possible."²⁰ The Department recommended that the Commission approve the 1.6 percent level of DSM because it is the most cost-effective. It also states that this level of energy savings is "aggressive".²¹

Also, as discussed earlier in this document, if the pipeline customers, who have not been able to take advantage of the Company energy efficiency programs, were left out of the denominator, Otter Tail's energy efficiency would range from 2.31 percent to 2.74 percent. That level of energy efficiency far surpasses the recommendation of the CEO for Otter Tail to be required to use a 2.0 percent energy savings goal.

C. Load forecast is overstated

The CEO also asserts that the Company's load forecast is overstated. They state that "OTP seems to rely entirely on the pipelines' own forecast of energy use; such a shift would take a large portion of load forecasting out of Otter Tail's hands and out of the oversight of the Commission." This statement is incorrect for two reasons: First, while Otter Tail does receive a load forecast estimate from the pipelines, the Company does not blindly use that exact forecast in its energy and demand forecasts. The Company compares past forecasts to actual usage to assess the accuracy of the forecasts supplied by the pipelines as well as other judgement to arrive at the final forecast used in the resource plan. Furthermore, it would be very dangerous to rely solely on econometric modeling of a customer that is such a large portion of the Company's load. It is

²⁰ October 5, 2016 Comments of the Minnesota Department of Commerce, Division of Energy Resources, page 18.

²¹ October 5, 2016 Comments of the Minnesota Department of Commerce, Division of Energy Resources, page 21.

necessary and wise to obtain as much information as possible from the customer from which the likely requirements of the customer can be evaluated—no one has more access to relevant information on the customer’s requirements than the customer does. Secondly, in no way does this lessen the oversight of the Commission on the forecast of pipeline sales. The Commission still reviews the forecast submitted by Otter Tail in resource plan and ratemaking proceedings and has every opportunity to consider the forecast submitted by the Company.

D. Environmental compliance risk

Otter Tail disagrees with the CEO claim that the Company has failed to meaningfully evaluate or disclose several environmental compliance obligations that are likely to affect its coal plants in the coming years. The CEO state that “OTP fails to properly evaluate or disclose the likelihood that it will be required to install additional emission controls for nitrogen oxides or sulfur dioxide at Coyote Station.”

The CEO comments misrepresent the timeframe in which Coyote Station may be required to install additional controls. In their comments, they indicate the need for additional controls at Coyote Station could begin “as early as 2018.”²² As explained in Otter Tail’s responses to CEO information requests 25 and 32, EPA has proposed that the next round of Regional Haze State Implementation Plans would not be required to be submitted until July 31, 2021. Further, as explained in response to CEO information request 32, it may take several years after that before final requirements are known. Any presumption by the CEO of the costs to comply with future rounds of the Regional Haze Rule at Coyote Station are extremely premature.

The CEO also states that “OTP’s coal plants face further carbon regulation risk.” This CEO comment references studies that indicate the costs of compliance with federal carbon regulations “far exceed the \$21.50/ton value used in OTP’s analysis.”²³ However, the studies referenced by the Clean Energy Organizations were developed prior to the August 3, 2015 announcement of the final Clean Power Plan.

Notwithstanding the fact that the Clean Power Plan is currently stayed, the most recent studies of the final Clean Power Plan have indicated a much lower carbon price. For example, a power sector workshop for the Eastern Interconnect was hosted on September 13, 2016 by the Great Plains Institute, Bipartisan Policy Center, and Duke University’s Nicholas Institute for

²² Clean Energy Organization Initial Comments Page 30

²³ Clean Energy Organization Initial Comments Page 33

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Environmental Policy Solutions. At that workshop, the Bipartisan Policy Center presented modeling results that predicted Year 2030 CO2 allowance prices for the Eastern Interconnect to be in the range of \$0 to \$8 per ton²⁴, while the Nicholas Institute predicted allowance prices for most states in the Eastern Interconnect of \$4.50 per ton.²⁵

The CEO also makes the claim that “OTP fails to account for the risk of higher externality values resulting from the Commission’s Externalities Docket.” After our stakeholder meeting held in Fergus Falls, MN on April 11, 2016 which included several representatives of the CEO’s, the CEO’s requested a Strategist sensitivity be run that include a high CO2 value of \$59/ton. That sensitivity is included as Sensitivity # 21 in Appendix I in the resource plan. The resources selected by Strategist in that sensitivity were a 248 MW CT with 400 MW of wind.

VI. SUMMARY

This resource plan reflects important progress that Otter Tail has achieved in meeting the Commission’s Order from Otter Tail’s most recent resource plan, Docket E017/RP-13-961. (See Table 1 for comparison of last Order, Otter Tail current preferred plan, and the Department’s recommended plan.). The timing for Otter Tail’s natural gas combustion turbine project and its 150 MW wind project are critical, both to be available when Hoot Lake Plant is retired and to take full advantage of the Production Tax Credit. This plan meets Minnesota’s renewable energy and greenhouse house gas reduction goals while at the same time, we believe, meets the regulatory requirements of the three jurisdictions served by Otter Tail Power Company. For these reasons, Otter Tail requests Commission approval of the plan.

VII. PROPOSED ORDERING PROVISIONS

Otter Tail requests that the Commission approve its proposed resource plan, and specifically include in its Order in this case the following ordering points:

1. Approve Otter Tail’s resource plans as modified below.

²⁴ <http://cdn.bipartisanpolicy.org/wp-content/uploads/2016/08/Macedonia-Power-Sector-BPC.pdf> Slide 5

²⁵ <http://cdn.bipartisanpolicy.org/wp-content/uploads/2016/08/Ross-Power-Sector-BPC.pdf> Slide 9

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2. Confirm the addition of 150 MW of wind in 2019 and authorize the addition of up to 150 MW of additional wind in the 2020-2023 timeframe if cost-effective and to the extent consistent with reliable system operation;
3. Use a 1.6 percent energy efficiency goal;
4. Confirm the addition of an approximately 250 MW natural gas combustion turbine at [NOT PUBLIC DATA BEGINS... ..NOT PUBLIC DATA ENDS] in 2021.
5. Authorization to add up to 30 MW of solar in 2020 or meet Minnesota's Solar Energy Standard with the purchase of qualifying solar renewable energy credits through MRETS.
6. Find that continued operation of the oil-fired peakers at Jamestown, ND (Units 1 & 2) and Lake Preston, SD is cost-effective.
7. Find that the Company's demand and energy forecasts are reasonable.
8. Find that the Company's preferred plan as modified will meet Minnesota's Renewable Energy Standard, that the Company is adequately tracking environmental issues and the Clean Power Plan, and that the Company will meet Minnesota's Greenhouse Gas Reduction Goal through the study period.
9. Otter Tail will file its next resource plan no later than December 1, 2018. (Note: This schedule will offset Otter Tail's filing by five months from Xcel's next resource plan filing.)

Dated: December 5, 2016

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ BRIAN DRAXTEN
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CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's 2017-2031 Resource Plan
Docket No. E017/RP-16-386**

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 to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Reply Comments**

Dated this 5th day of **December, 2016**.

/s/ Kim Ward _____
Kim Ward, Regulatory Filing Coordinator
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