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J.W. Boyce (1884-1915)

October 10, 2005

Pam Bonrud, Executive Director
Public Utilities Commission
500 E Capitol
Pierre SD 57501

via email pam.bonrud@state.sd.us

Re: In the Matter of the Application by Otter Tail Power Company on Behalf of Big Stone II Co-Owners for an Energy Conversion Facility Permit for the Construction of Big Stone II Project (EL05-022)
Our File No. 11402.000

Dear Ms. Bonrud:

I am writing to provide information that was requested by the Commission during the September 13, 2005 public hearing in Milbank. During the public hearing, Terry Graumann presented a chart and information regarding sulfur dioxide (SO_2) emissions. (See Hearing Transcript p 32-33) As indicated on page 35 of the transcript, Commission Chairman Hanson requested similar information for nitrogen oxide (NO_x), mercury (Hg) and carbon dioxide (CO_2).

In response to said request, enclosed please find copies of three charts depicting the emission information for the three substances identified by Chairman Hanson and a chart of bullet points providing explanations as to the CO_2 emissions chart.

Sincerely yours,

BOYCE, GREENFIELD, PASHBY & WELK, L.L.P.

Christopher W. Madsen
CWM/vjj
Attachments – Nitrogen emissions graph, mercury emissions graph, carbon dioxide emissions graph and chart of bullet points re the carbon dioxide graph

cc: Mark Rolfes (via email mrolfes@otpco.com w/enc)
Terry Graumann (via email tgraumann@otpco.com w/enc)

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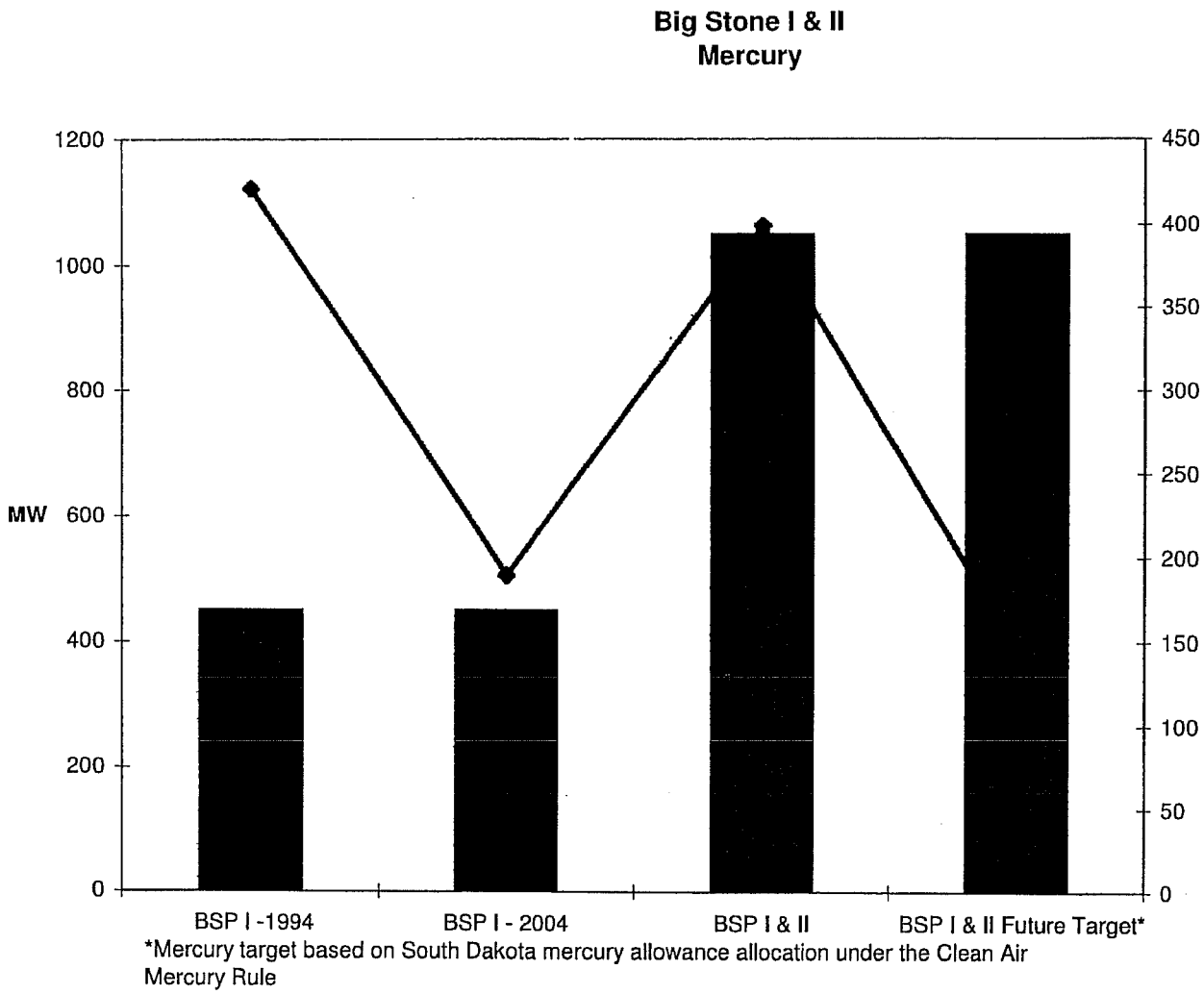
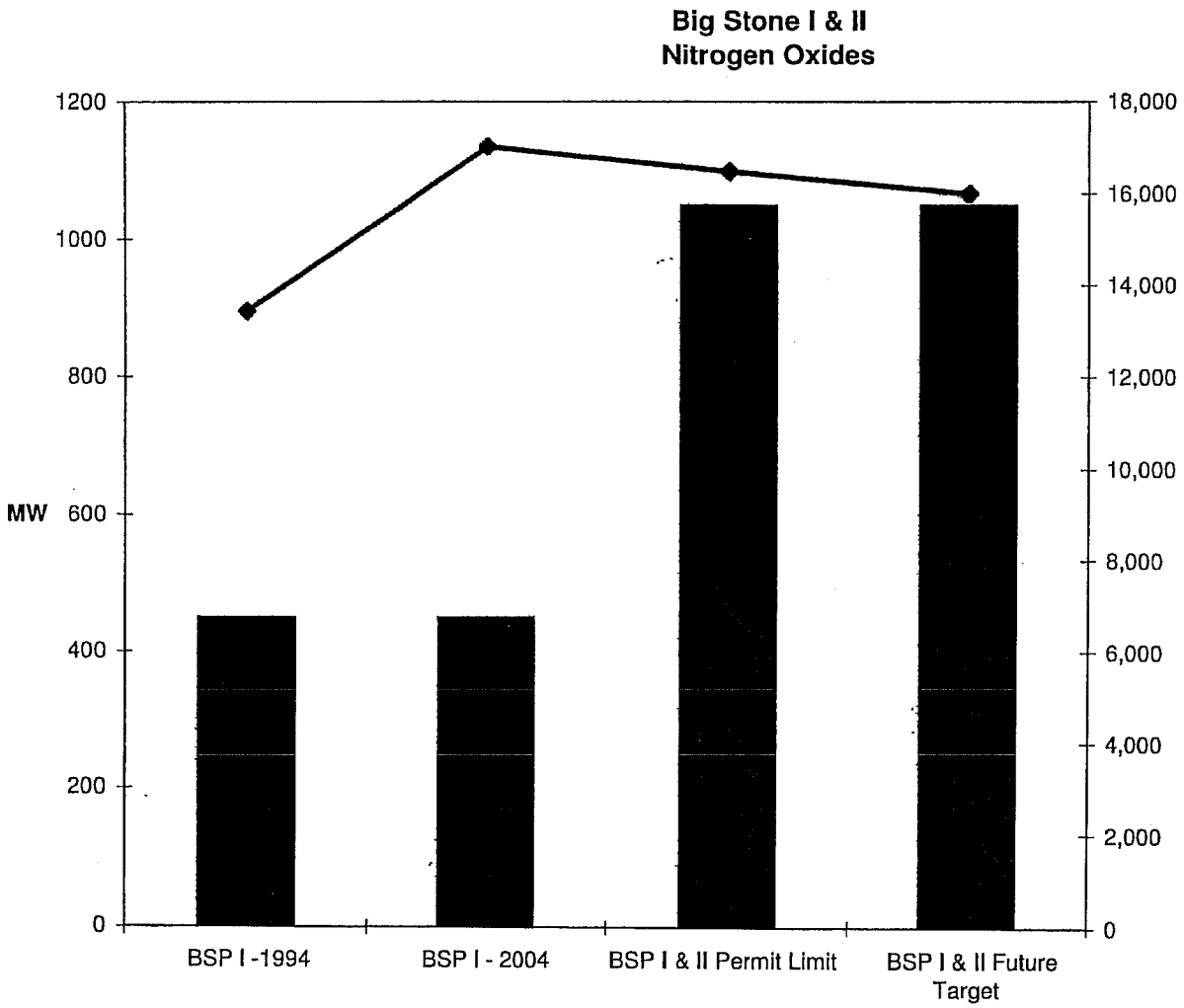

Big Stone I & II
Mercury
MW
1200
1000
800
600
400
200
0
450
400
350
300
250
200
150
100
50
0
BSP I -1994
BSP I - 2004
BSP I & II
BSP I & II Future Target*
*Mercury target based on South Dakota mercury allowance allocation under the Clean Air Mercury Rule


Big Stone I & II
Nitrogen Oxides
MW
1200
1000
800
600
400
200
0
18,000
16,000
14,000
12,000
10,000
8,000
6,000
4,000
2,000
0
BSP I -1994
BSP I - 2004
BSP I & II Permit Limit
BSP I & II Future Target

Big Stone I & II
Carbon Dioxide Intensity

* Based on BSP II Project's voluntary $25 million dollar investment in additional regional tranmission capacity and potential development by others of 800 MW of wind generation

Carbon Dioxide Emissions

- Carbon dioxide produced by combustion of all fossil fuels
- Emission rate determined by fuel carbon content and process efficie
- No commercially available capture sequestration technology
- In the meantime, CO2 intensity is appropriate benchmark