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September 3, 2009

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501-5070

**RE: In the Matter of the Consideration of the New PURPA Standards
Docket No. EL08-028**

Dear Ms. Van Gerpen:

Otter Tail Power Company ("Otter Tail") provided testimony in this docket on June 19, 2009 pursuant to the Commission's Scheduling Order dated March 9, 2009.

The items before the Commission may determine whether to implement the following four new federal standards to PURPA: (1) Integrated Resource Planning, (2) Rate Design Modification to Promote Energy Efficiency Investments, (3) Consideration of Smart Grid Investments, and (4) Smart Grid Information.

Otter Tail agrees with the Staff's comments on the above PURPA standards and commends them for their objective analysis. We have no additional comments at this time.

If you have any questions, please contact me at 218-739-8595 or by email at dprazak@otpco.com.

Sincerely,

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

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By electronic filing