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VIA ELECTRONIC FILING

May 17, 2011



Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol
Pierre, SD 57501

**Re: In the Matter of the Petition of Otter Tail Power Company to Establish a
Transmission Cost Recover Rider
SDPUC Docket No. EL10-015**

Dear Ms. Van Gerpen:

Attached for filing are Otter Tail Power Company's Comments on risks associated with placing FERC jurisdictional transmission investments in the Transmission Cost Recovery Rider. These Comments are being filed at the request of Commission Staff.

If you have any questions regarding this filing, please contact me at 218-739-8269, or bmorlock@otpc.com.

Very truly yours,

/s/ Bryan D. Morlock
Bryan D. Morlock, P.E.
Consultant, Planning
Otter Tail Power Company
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