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June 24, 2013



Patricia Van Gerpen Executive Director South Dakota Public Utilities Commission 500 East Capitol Avenue Pierre, South Dakota 57501-5070

Re: In the Matter of Otter Tail Power Company's 2014-2015 Energy Efficiency Plan - Updated tables Docket No. EL13-016

Dear Executive Director Van Gerpen:

Otter Tail Power Company hereby submits updated tables for the South Dakota Public Utilities Commission's review regarding our proposed South Dakota Energy Efficiency Plan (EEP) for 2014-2015.

Otter Tail is historically a winter peaking utility and is expected to remain winter peaking throughout the EEP biennial period. However, as a member of the summer peaking Midcontinent Independent System Operator region (MISO), Otter Tail now bases its capacity resource needs for integrated resource planning on the summer season. It appears, at least for the short-term, that MISO intends to maintain the summer season construct.

The enclosed tables reflect a transition to a focus on summer capacity savings for the 2014-2015 EEP. In our May 1, 2013 EEP filing, the benefit/cost analysis we provided was based primarily on winter peak and associated avoided capacity costs, which is what we've historically done in both South Dakota and Minnesota. On June 1, 2013 when we filed our 2014-2016 Minnesota Conservation Improvement Program triennial, benefit/cost analysis switched to reflect summer peak reductions. To be consistent, we are providing South Dakota with updated analysis based on summer capacity reductions. Most benefit /cost ratios have decreased due to less summer capacity savings and corresponding avoided costs. The Participant benefit /cost ratio remains unchanged. Energy saving goals have not changed. Overall the EEP plan is still cost effective in all five benefit/cost tests.

We are available to meet with the Commission as well as Staff on the details of this filing. If you have any questions, please feel free to contact me at 218-739-8303.

Sincerely,

/s/ KIM PEDERSON Kim Pederson, Manager Market Planning

jce Enclosures By electronic service

