

215 South Cascade Street  
PO Box 496  
Fergus Falls, Minnesota 56538-0496  
218 739-8200  
[www.otpc.com](http://www.otpc.com) (web site)



June 25, 2010

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

**RE: Docket RM09-002 -- In the Matter of the Adoption of Rules Regarding Renewable, Recycled and Conserved Energy.**

Dear Ms. Van Gerpen:

Otter Tail Power Company ("Otter Tail"), hereby submits comments on proposed Section 20:10:38 of the South Dakota Public Utilities Commission Administrative Rules.

Section 20:10:38:06, Annual Report Requirements, states that in addition to the requirements of SDCL 49-34A-105, a retail provider of electricity shall include, among other things, "The amount of total generation capacity contracted for in purchase power agreements and the location of each generation facility." While Otter Tail regularly purchases capacity to meet its capacity obligations of its retail customers, the capacity purchase agreements do not always specify which generation facility the capacity is being purchased from. Therefore, while Otter Tail could report the total generation capacity contracted for in purchase power agreements, it could not specifically identify which generation facility the capacity is being obtained from.

Section 20:10:38:06 also states that a retail provider of electricity shall include in its annual report "The amount of renewable generation capacity contracted for in purchase power agreements and the location of each renewable generation facility." Otter Tail's concern with the inability to know the location of generation facilities for purchased capacity from non-renewable sources extends to renewable generation sources.

This letter is being served by efileing on Ms. Patty Van Gerpen. Questions can be addressed to me at [kkaseman@otpc.com](mailto:kkaseman@otpc.com) or at 218-739-8693.

Sincerely,

/s/ KERRY KASEMAN

Kerry Kaseman  
Resource Planner

wao

By electronic filing