

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpco.com (web site)

December 17, 2010



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 Request to Amend Rules Regarding ARSD Chapter 20:10:17
Gas and Electric Customer Billing
Docket No. RM10-001**

Dear Ms. Van Gerpen:

Otter Tail Power Company (“Otter Tail” or “the Company”) respectfully submits these comments to the South Dakota Public Utilities Commission (“Commission”) regarding the revised draft rules issued in the above docket on November 23, 2010. Otter Tail appreciates the opportunity to comment on the revised draft rules.

Otter Tail takes pride in placing an emphasis on providing customers with accurate and timely bills. As provided in the Company’s response to information requests in this proceeding, this emphasis is reinforced by the Company’s Customer Service Guarantee program. Each year, Otter Tail reads approximately 185,000 meters and issues approximately 138,000 bills to South Dakota customers.

Otter Tail does have concerns with the proposed changes to rules 20:10:17:06, 08 and 09 that would not allow Otter Tail to go back and bill residential customers for consumption that was not included on previous billings due to metering and billing errors. Otter Tail believes this places an undo preferential treatment on the residential class of customers. Otter Tail has had experience with situations where the wiring on the customer’s side of the meter caused a customer to be incorrectly billed or not billed for actual consumption. These situations are outside of Otter Tail’s control and the proposed inability to back bill for the correct consumption by a residential customer is not fair to other classes of service or Otter Tail.

Ms. Patricia Van Gerpen

December 17, 2010

Page 2

Also, most Otter Tail meters that are in service are mechanical devices. Slow or dead meters are usually caught within the month or two of slowing down or completely failing to record consumption. The inability to bill residential customers for an estimated level of consumption during the time the meter slowed down and/or eventually failed, gives the residential customer class preferential treatment. Therefore, Otter Tail urges the Commission to not change the current rules regarding back billing residential customers for metering and billing errors.

Regarding the proposal to add rule 20:10:17:09:01, due to the concerns and recommendation above, Otter Tail does not believe the addition of this rule to be necessary.

Otter Tail appreciates the opportunity to comment and we look forward to the opportunity to appear before the Commission at a hearing in this matter to discuss our concerns and recommendations.

If you have any questions, regarding this filing, please contact me at 218 739-8838 or rlspangler@otpc.com.

Sincerely,

/s/ RON L. SPANGLER JR.

Ron L. Spangler Jr.

Rate Case Manager

Tariff Application and Compliance

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Enclosures

By electronic filing