OTTER TAIL POWER COMPANY Docket No: EL17-002

Response to: South Dakota Public Utilities Commission

Analyst: SDPUC Staff
Date Received: 01/24/2017
Date Due: 02/07/2017

Date of Response: 02/07/2017

Responding Witness: Cary Stephenson, Associate General Counsel

<u>Information Request</u>:

Please refer to the Data Retention content in Section 1.09, Sheet No. 1. Please provide OTP's definition of "a reasonable period of time" in the second sentence.

Attachments: 0

Response:

OTP understands this IR as referring to the following "The Company will retain for a reasonable period of time records related to disclosure of Meter Data to Third Parties."

At a minimum a reasonable period of time is any time required by statute, rule, or Commission order. In the absence of a controlling legal retention period, a reasonable period of time is determined by OTP's business needs. As to the records referenced by this question, OTP believes the minimum period of time for retention is five years pursuant to South Dakota Rule 20:10:16:04.