

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



December 26, 2018

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501

**RE: In the Matter of Otter Tail Power Company's Application for Approval of Tariff Changes to Facilitate Implementation of A New Customer Information System Docket No. EL18-031
Notice of Delay in Implementation of New Customer Information System and Request to Modify Effective Date of Tariff Changes.**

Dear Ms. Van Gerpen:

This letter is to provide notice in the above-referenced docket that Otter Tail Power Company (Otter Tail or Company) has determined it prudent and necessary to delay implementation of the Company's new customer information system (the CISone project) from January 1, 2019 to February 1, 2019 as described herein. With this letter we also respectfully request that the Commission modify its Order Approving Tariff Revisions dated November 5, 2018 to reflect this development. This decision comes after a series of "go live" exercises and detailed testing of the new system. Otter Tail's leadership concluded this step was necessary on Friday, December 21, 2018. We notified Commission staff the same day. This letter formalizes that notice.

The Company believes additional testing is necessary to verify correct bill printing for certain rates and to confirm the proper functioning of the new system's financial reporting and compliance features. A guiding principle during the CISone project has been getting the job done correctly so customers experience a seamless transition and billing accuracy is maintained. Additional testing is consistent with this principle. It also affords the Company more time to make sure staff are fully trained and comfortable operating the new system.

On November 5, 2018 the Commission approved tariff necessary to implement the new system. These changes were to be effective January 1, 2019. Due to the need for additional testing Otter Tail respectfully requests that the tariff revisions previously approved by the Commission be effective for services rendered on and after February 1, 2019. This change should have no impact on our customers. Otter Tail is currently billing customers interim rates through our legacy customer information system.

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Sincerely,

/s/ Cary Stephenson
Cary Stephenson
Associate General Counsel

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