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May 4, 2020

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st floor
500 East Capitol Avenue
Pierre, SD 57501-5070

RE: Otter Tail Power Company Notice to Temporarily Estimate Meter Readings – COVID-19 Update

Dear Ms. Van Gerpen:

Otter Tail Power Company (Otter Tail) provides this notice to temporarily use estimated meter readings in certain meter locations. This is necessary to provide social distancing for the safety of our staff and our customers during this COVID-19 pandemic.

SD Rule 20:10:17:02 Meter Readings states "...unless the utility has a plan to test check meter readings, a utility representative must read the meter at least once each 12 months and at the beginning or termination of service. SD Rule 20:10:17:11 Estimated Billing provides "...Only in unusual cases, such as inability to gain access to a meter or bad weather or when approval is obtained from the customer shall more than three consecutive estimated bills be rendered."

Due to Governor Kristi Noem's recent Executive Orders and the current guidance for COVID-19 many customers are practicing social distancing or are isolating themselves. Otter Tail wants to support this guidance for both our customers and employees. To reduce personal interactions between customers and field staff, for locations where a meter is located inside an inhabited structure, Otter Tail will be temporarily suspending meter reading and estimating applicable meter reads. Following COVID-19 guidance, Otter Tail initiated this practice on March 19, 2020. Otter Tail plans to estimate these meters for reads that would occur from March 19, 2020 through June 30, 2020. Thereafter, Otter Tail will evaluate if continued estimation is necessary.

Otter Tail customers will continue to receive a monthly electric service statement. Customers' electric service statements will be marked with an "E" next to the meter readings to advise the customers the meter readings were estimated. When determining an estimated read, the system determines a daily average. To determine the daily average, the billing system looks for a reading from the same time last year to use for the average consumption calculation. If that read is not available, the system uses the previous two period reads for the average consumption calculation. Then the system calculates the current days in the billing period. The daily average, in addition to weather impacts are used in the calculation for estimated consumption.

Customers are encouraged to contact Otter Tail in the event they are unable to make a payment, whether the meter reading is estimated or an actual read. Otter Tail is ready and willing to partner with customers including setting up payment plans to help work through higher bills incurred during this unprecedented time.

Otter Tail estimates this will affect approximately two percent of our customers or fewer who have meters located inside their businesses and/or homes. We are estimating that 80 percent of these customers will be residential customers.

Otter Tail has electronically filed this document with the Commission. Please contact me at (218) 739-8657, or molsen@otpc.com, should you have any questions.

Sincerely,

/s/MATTHEW J. OLSEN

Matthew J. Olsen

Manager, Regulatory Proceedings and Compliance

cjh

By electronic filing