

**STATE OF SOUTH DAKOTA
BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Otter Tail Power
Company's Petition for Approval of
a Bill Redesign and Modifications
to General Rules and Regulations,
Rate Schedule Section 1.05**

Docket No. EL23-

PETITION

I. INTRODUCTION

In this filing, Otter Tail Power Company (Otter Tail or the Company) submits this Petition to the South Dakota Public Utilities Commission (Commission) for approval of a new design to our Electric Service Statement (billing statement) contained in our General Rules and Regulations, Rate Schedule Section 1.05, Contracts, Agreements and Sample Forms. The implementation of this redesigned billing statement and other pertinent forms is part of our ongoing effort to improve customer satisfaction and enhance communications with our customers in a manner that is clear and easy to understand. The new billing statement design will update the display of our bill as well as resolve issues that remain from the transition from our legacy billing system to our current system. Along with the upgrade to our Customer Information System (CIS) completed in 2019, the new billing statement design is part of a suite of upgrades to improve the way we communicate with customers and exchange information on their electric service, improving their overall experience with Otter Tail as their electric service provider.

We request that the Commission approve changes to the following no later than December 1, 2023, to allow us sufficient time to communicate the changes to our customers and provide the Company adequate time to test and implement the approved forms.

- Electric Service Statements (billing statements)
- Notice of Proposed Disconnection
- General Rules and Regulations Rate Schedule Section 1.05

II. BACKGROUND

Otter Tail has not made a significant update to our billing statement in decades. After utilizing a legacy Customer Information System for nearly 30 years, we completed an upgrade to our CIS in 2019. This upgrade paved the way for enhanced customer experience and interaction. We did not, however, want to introduce additional complexity to the CIS transition by also initiating a new billing statement design at that time. Now

that the CIS transition is complete and we have operating experience to work with, we are ready to further enhance the customer experience through a revised billing statement. To determine the optimal design, we sought input from utilities that have recently completed this process, and most importantly, our own customers. As described below, we crowdsourced this design with our customers to account for their input. The billing statement described in this filing is the result of that customer input and the capabilities of our current CIS to bring clarity and improve our customers' experience.

III. REQUIRED FILING INFORMATION

This Petition sets forth information specified in ARSD Part 20:10:13:26 regarding the proposed changes to our General Rules and Regulations, Section 1.05 Contracts, Agreements and Sample Forms Rate Schedule.

A. Name, address, and telephone number of the utility making the filing

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215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8200

B. Name, address, telephone number, and email of the attorney for Otter Tail Power Company

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Associate General Counsel
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C. Utility employees responsible for filing

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We request that all communications regarding this proceeding, including data request, also be directed to:

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpc.com

D. Section and sheet number of tariff schedule

We propose updates to the introductory page and several sample forms in our Section 1.05 Tariff. The updated Sheets are as follows:

South Dakota Tariff Schedules Volume II – Electric Service

Section 1.05

Fourth Revised Sheet No. 1	Cancelling Third Revised Sheet No. 1
Seventh Revised Sheet No. 11	Cancelling Sixth Revised Sheet No. 11
Sixth Revised Sheet No. 12	Cancelling Fifth Revised Sheet No. 12
Seventh Revised Sheet No. 13	Cancelling Sixth Revised Sheet No. 13
Sixth Revised Sheet No. 14	Cancelling Fifth Revised Sheet No. 14
Fifth Revised Sheet No. 15	Cancelling Fourth Revised Sheet No. 15
Sixth Revised Sheet No. 16	Cancelling Fifth Revised Sheet No. 16

Forms

Sheet No. 1 – Contracts, Agreements and Sample Forms list
Sheet No. 11 – Electric Service Statement, pg 1
Sheet No. 12 – Electric Service Statement, pg 2
Sheet No. 13 – Adjusted Electric Service Statement, pg 1
Sheet No. 14 – Adjusted Electric Service Statement, pg 2
Sheet No. 15 – Notice of Proposed Disconnection, pg 1
Sheet No. 16 – Notice of Proposed Disconnection, pg 2

E. Description of the change

The changes to our Section 1.05 Tariff are described below and shown in more detail in the attached redline and clean versions of this Tariff (Attachment 5).

1. Sheet No. 1 – Contracts, Agreements and Sample Forms list

The Electric Service Statement, Sheet No. 11 bullet has been updated to identify this electric service statement as our new redesigned Standard Electric Service Statement.

The Adjusted Electric Service Statement, Sheet No. 13 bullet has been updated to identify our new Commercial Electric Service Statement.

Additionally, a line has been added describing the location of a new Contracts, Agreements and Sample Forms area on our website. Upon approval, these forms will be located at otpc.com/SDForms.

In 2018, Commission Staff requested Commission guidance and input regarding a process to reduce the amount of tariff filings required for utilities regarding sample forms. Staff provided to the Commission that they were comfortable with the concept that utility tariffs include copies of the forms with a link to the company's website where the most current forms could be found. The form in the tariff and the current version would be materially the same, however, minor edits, such as grammatical corrections could be made by notifying Staff via email when changes are made to the forms so staff could review the update and determine that the changes did or did not require a tariff change. If Staff agreed it did not require a tariff change, the new form(s) would be uploaded to a utility's form's location on their website. The company would file for approval when the change affected rates or conditions of service and at a minimum, at the time of a rate case, the most current versions would be updated in the tariff.

We are proposing to create this website location and updating our tariff to identify this location. This will put us in a position, if staff agrees, to make minor edits to our forms in the future without the need for a tariff filing.

2. Sheet Nos. 11 and 12 – Electric Service Statement

We have replaced the current Electric Service Statement sample with our new redesigned Standard Electric Service Statement. In addition to all the changes to our bill design as described in this filing, this new sample includes the Phase-In Rider line item.

During our preparation of this filing, it was identified that our current Sample Electric Service Statement was not updated at the time of implementation of our Phase-In Rider on September 1, 2019 (Docket No. EL19-025)¹. The Phase-In Rider has been included as its own line item on our customer bills, however our current sample Electric Service Statement in our tariff does not reflect this. This is being corrected as part of this filing.

3. Sheet Nos. 13 and 14 – Adjusted Electric Service Statement / Commercial Electric Service Statement

The Adjusted Electric Service Statement sample has been replaced with our new Commercial Electric Service Statement described in more detail further below in this filing.

4. Sheet Nos. 15 and 16 – Notice of Proposed Disconnection

The old Notice of Proposed Disconnection has been updated with our newly designed Disconnection Notice described in more detail further below in this filing.

F. Reason for the change

This new redesigned billing statement and other pertinent forms is part of our ongoing effort to improve customer satisfaction and enhance communications with our customers in a manner that is clear and easy to understand. The new billing statement design will update the display of our bill as well as resolve issues that remain from the transition from our legacy billing system to our current system described in more detail below. Along with the upgrade to our Customer Information System (CIS) completed in 2019, the new billing statement design is part of a suite of upgrades to improve the way we communicate with customers and exchange information on their electric service, improving their overall experience with us.

G. Present rate

Otter Tail's present rates are not impacted as there are no proposed changes to any rate being charged to customers.

¹ In the Matter of Otter Tail Power Company's Petition for Approval of Phase-In Rider Rate, Docket No. EL19-025.

H. Proposed rate

Not Applicable.

I. Proposed effective date of modified tariff

The date of this filing is August 18, 2023. We propose the new bill design and modifications to our Section 1.05 Tariff become effective May 1, 2024, which is the date we expect to roll out our new bills. Additionally, we request an extension of time from the usual response time to submit our Compliance filing in this docket to accommodate the future effective date. This Section 1.05 tariff will be included in an upcoming Petition for approval of tariff changes to facilitate implementation of our new advanced grid infrastructure with an anticipated effective date prior to the effective date of this bill redesign roll-out of May 1, 2024. We request the due date of the compliance filing in this matter be March 1, 2024, 60 days prior to the effective date.

J. Approximation of annual amount of increase or decrease in revenue

No change in revenue is expected for current customer billings.

K. Points affected

The proposed modifications would be applicable to all areas served by Otter Tail in South Dakota.

L. Estimation of the number of customers whose cost of service will be affected and annual amounts of either increases or decreases, or both, in cost of service to those customers; and

No change in revenue is expected for current customer billings.

M. Statement of facts, expert opinions, documents, and exhibits to support the proposed changes

Supporting information is provided in narrative throughout this Petition and the Attachments to this filing.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Background

Our billing statements are the most important means of communication we have with our customers. The current billing statement does not provide an

opportunity to share a thorough explanation of the billing components and has a very antiquated design. Except for minor modifications, our current billing statement format has been in place for several decades. Our current billing statement format was last approved with modifications on August 1, 2019 as part of our most recent rate case² and on February 1, 2019 as part of our transition to our new CIS.³

When we implemented our new CIS in February 2019, we encountered limitations in our current billing statement design that are resolved by the proposed new design. With the new CIS, the billing details became more difficult for us to explain to customers due to the display limitations using the current billing statement format. With our current billing statement, CIS utilizes a boxed format with a predetermined number of lines to display billing information for each meter. There have been occasional billing issues when information needed for billing hasn't fit in this predetermined area. With our new billing statement design and our development efforts with Cayenta Utilities, our CIS partner, we are proposing a more dynamic billing statement design that will not have limitations on the number of lines available to display billing details, even for our most complex rates. Rather, all the required billing components will flow on to the bill with no restrictions. This will reduce the risk for any potential billing display errors due to the improper handling of the billing components.

When we started the bill redesign journey, we wanted specific input from our customers and to include the best elements of other utilities design billing statements. As described in the next section, we sought customer input on which attributes were most valuable on a billing statement. We then began researching other utility designs. We visited with three other utilities that recently went through a bill redesign effort to understand the scope of the project. We documented lessons learned from each of those utilities and took that into consideration when developing our current proposed design. We also reviewed more than 50 other utilities' bills, including the billing statements of our neighboring utilities. We pulled relevant information from those examples that aligned with our goals and perceived customers' needs. We compiled the best version of each bill component to use in our design. Our graphic design department

² In the Matter of the Application of Otter Tail Power Company for Authority to Increase Its Electric Rates, Docket No. EL18-021.

³ In the Matter of the Filing by Otter Tail Power Company for Approval of Tariff Revisions to Facilitate Implementation of a New Customer Information System, Docket No. EL18-031.

brought those designs to life as we moved through several different versions of the bill until we settled on a proposed design to bring forth to our customers. To further refine the design with specific and valuable input from our customers, we shared our design with our customers through our Otter Voice⁴ community. Our customer feedback and suggestions for improvements led us to our final design.

B. Bill Redesign Input – Otter Voice Bill Design Survey and Feedback

With Human-Centered Design at the core of our decision making, we took a comprehensive bill survey to our Otter Voice community in May 2022. Otter Voice is a group of approximately 900 customers in MN, ND, and SD that have opted into this community to provide Otter Tail with feedback on customer experience initiatives. For the purposes of our first bill survey to the Otter Voice members, there were 399 respondents. The survey was a series of approximately 20 questions in which we asked customers what was most important to them on a new design.

The feedback from our first bill survey told us that:

- Customers expect certain basic elements of the bill to be easy to find, such as due date and amount due. Those two items were listed as the most important items on the bill.
- Customers expect the bill to be easy to understand.
- Customers like larger font so it's easy to read for all age groups.
- Customers want more information pertaining to riders.
- Customers want a design and colors that work for color-blind individuals.
- Customers want information presented in a simplistic format.
- Customers want to be able to easily track their Even Monthly Payment balances.
- Customers want transparency on the total cost per kWh, including rider information.

With these findings and our research of the state of the industry, we developed our first design draft. In November 2022, we took that design to the Otter Voice community again. This time we had a bill mockup to show them and

⁴ Otter Voice is an online community of our customers that helps us continue to provide exceptional service. Customers offer feedback on our current practices, preview new programs, and suggest improvements for our company, allowing us to use direct feedback to design programs and options focused on addressing their obstacles.

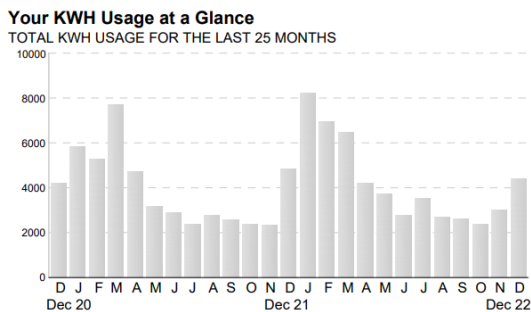
requested they share feedback. The customers were provided an opportunity to offer open-ended responses to each question to help us better understand their feelings on each bill component. Through the survey, we gathered valuable customer feedback that helped us to further understand what our customers desire in a bill design and that led us to our final design.

For this survey, we only went to the members in South Dakota. There were 81 Otter Voice members in South Dakota that received the bill design survey and of those, 25 responded. The survey was a series of approximately 30 questions in which we shared images of our new design and asked our customers to rate their experience in finding and understanding information such as:

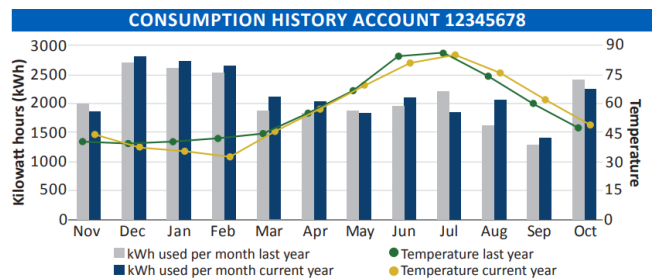
- Account number
- Bill due date
- Billing details
- Presentment of customer service phone number and online payment URL

In our “Your Account Summary” section on page 1 (front side), we asked if they were able to easily understand how we arrived at all balances presented. If customers participate in our Even Monthly Payment (EMP) plan, we asked if the balances presented to them in our new EMP section were clear. We also asked for feedback on our consumption graph design. Currently our graph shows 25 months of usage information. The new proposed graph design consists of two years of consumption with a respective temperature overlay. While this graph shares a similar amount of historical data as the current one, we chose to do a side-by-side year-over-year bar graph. This allows customers to do an easy comparison between this year and last year during the same billing period.

Current Billing Statement



Redesigned Billing Statement



The temperature overlay is designed to give customers insight into why their bills may have gone up or down and to better associate the impact of weather on billing amounts. Our intention is that by having both the graph and weather overlay available for viewing, we can more clearly explain bill increases related to weather impacts.

In our “How We Calculated Your Bill” section on page 1 (back side) of the bill, we asked customers to review the amounts presented and if it was easy to understand how we calculated the amounts.

The survey results were extremely positive in the following areas:

1. Ease of understanding
2. Overall appearance
3. Overall satisfaction with the bill

The rating options we provided in these three broad categories were Very Poor, Good, Very Good, and Excellent. For ease of understanding, 96 percent of our customers scored us Very Good or Excellent. For overall appearance, 86 percent rated us Very Good or Excellent and for overall satisfaction of the bill, members of the community gave us an 88 percent rating of Very Good or Excellent. After receiving the information from our Otter Voice community, we went to work modifying the bill based on customer feedback. Most of the changes were subtle as customers were pleased with our original overall design.

C. Purpose of Filing

Our billing statement redesign focuses on customer preference, efficiency, and clarity of the information provided. While we intend to maximize customer use of electronic billing programs, the bill redesign is applicable for customers receiving a billing statement in either electronic or paper form.⁵ We expect our redesigned billing statement to more effectively deliver customer-relevant information that will increase customer engagement and value, reduce the need for customers to call us for bill explanations, and streamline internal processes.

The idea behind our proposed design was to satisfy both the customer that wants to know high-level information like the amount due and the due date, as well as the customer that desires additional billing details. The page 1 (front side)

⁵ Currently, approximately 69 percent of our customers receive paper billing statements, with the remainder viewing them electronically in a pdf format. We continue to promote paperless billing with a goal of increasing adoption by two percent each year. By 2027, we expect 40 percent of our customers to utilize paperless billing, with almost 60 percent of our customers continuing to utilize a paper bill.

provides high-level information quickly and easily. It includes items in an easy-to-understand account summary that includes the billing date, the due date, adjustment and payment totals, and the current and total amounts due. For our Even Monthly Payment (EMP) customers⁶, we have included a concise area to review their budget balance information. We believe this EMP information display format will not only benefit customers but also our Customer Service Representatives in assisting customers with the explanation of EMP balances. Under our current design, there is no concise area where all EMP balances are displayed together, making it difficult for customers to understand carry forward balances and connecting EMP balances from one month to the next. We believe this new designated EMP section of our billing statement will remedy our existing shortcomings in this area.

For the customer who wants more information, the payment and adjustment details can be found on page 1 (back side) of the billing statement, as well as the required regulatory messages, and all billing details. We added a QR code and link to our website where customers can locate explanations of billing terms. These terms will be provided to customers initially through the Customer Information Brochure that is distributed when they become an Otter Tail customer. These terms will also be included in the How to Read My Bill information that is available to customers through our website. This list of terms includes, but is not limited to, a description of the Mandatory riders, Energy Adjustment, Customer Charge, Facilities Charge, Adjusted Bill as well as a definition for Proration.

The billing details on page 1 (back side) of our bill will accurately align with information contained in our CIS, which should lead to easier explanations by our Customer Service Representatives if customers contact us regarding their bill.

As explained earlier, when we converted to our new CIS in February 2019, there were several limitations on how information can be presented on our existing bill. Currently, billing details in the CIS are displayed differently than the billing details on the billing statement making it difficult to assist customers with bill calculation questions. The new billing statement design will assign all charges that belong with a meter to that meter specifically in our billing details instead of showing those rider totals in the Other Charges and Credits section of the bill. The

⁶ Approximately 10 percent of Otter Tail's residential customer utilize the Even Monthly Payment option. EMP allows customers to pay a set amount each month based on their usage from the prior twelve months. This avoids significant bill fluctuation in months of higher usage. The monthly amount is reviewed after seven bills and 12 bills to ascertain the reasonableness of the budget amount and adjusted if necessary.

sales tax and rider charges will be displayed with the billing details for each meter in their own section. This will keep the information in our new design aligned with our CIS and simplify explanation to customers of how meter charges are calculated. Under our current design, the Other Charges and Credits section of our bill includes the Energy Efficiency Adjustment, Transmission Cost Recovery, the Phase-In Rider and Sales Tax. Each specific meter or area light will now have each of these segmented out as part of those charges. We will no longer display them as a lump sum separate from the meter charges. We chose this design intentionally to ensure transparency to our customers as well as to align meter charges on the bill with those same charges in our CIS.

Under our current bill presentment, there can be confusion at transitions between seasonal rates (typically June and October bills). The Winter and Summer information for each meter gets duplicated on the bill showing separate charges for each. The first section displays as “Winter,” and the second section appears as “Summer.” The duplication of some information such as customer charge and meter readings cause customer confusion at times. The seasonality split also requires twice as many columns of information on the bill. For customers with multiple meters at their location, this situation replicates itself with each meter, which can lead to a long and confusing bill. For example, a customer with two meters would have at minimum, four different segments of information on their current bill.

Customer concerns surrounding this type of presentment include misinterpretations that they are being charged twice for their kWhs used, twice for the Customer Charge, and confusion caused by this seasonal view. Resolving this problem was one impetus for the new design.

In our new design, we have streamlined information for Winter and Summer to show as individual line items as part of the billing details for each meter. Information will no longer be duplicated. Each rate structure associated with the proper season is shown alongside the kWhs consumed with no added confusion. We will indicate “Winter” or “Summer” throughout the year to identify the billing season. We have also added an explanation of what our Winter and Summer time periods are for customers under our Explanation of Billing Terms that customers can access as previously described through the QR code or URL provided. This should help customers understand there are different charges associated with the different seasons.

As stated earlier, our overall purpose of the design was to provide a billing statement that is easier to understand and clearly presents important billing information. We believe the way we chose to present billing information to our customers under this design will accomplish these goals.

D. Billing Statement Enhancements

In addition to the improved graph information and the streamlined billing details, we also added four “bubbles” that call out information at a glance. These include:

- Current month kWhs used
- Days in Billing Cycle
- Average kWh per day
- Average Daily Cost

We also increased the overall font size, added an area that allows for all payments and adjustments to be individually listed, and a more concise “Even Monthly Payment (EMP)” area. In the new design, we have included the “Your Account Summary” area on page 1 (front side) that clearly displays charges. All payments will be summarized in one grand total and all adjustments will also be presented in a summary. Details on payments and adjustments are included in a section on page 1 (back side) of the billing statement that will list all of them individually, along with the date. This is a huge win for our customers as currently, we are only able to present the most recent payment on their bill. There is no room to display all of them. This leads to calls to our Customer Service Representatives from customers wondering if we received their other payments.

We also made our customer service contact information more prominent, along with our payment option information, including an easy-to-use QR code. This QR code ties directly to our public website where customers can access our new customer engagement platform that will go live and be available to customers prior to January of 2024.

Our new design increases value by providing our customers with a better understanding of their bill which reduces customer questions and increases overall customer satisfaction.

E. New Commercial Customer Bill Design

We also propose similar changes to our commercial customer billing statement with a few factors distinguished from the standard billing statement. We recognize that our commercial customers may have an interest in having relevant billing components displayed that are different from our standard customers. Using our same standard design, we wanted to highlight certain areas of interest for commercial customers on our new bill design. When compared with the standard design, the areas that differ on the commercial design are as follows:

1. The commercial consumption graph includes total metered kW demand and kWhs used rather than a temperature overlay and kWhs used. The total metered kW is a cumulative demand total across all applicable meters.
2. The Average Daily Use “Bubble” on the standard design has been replaced by a total metered kW “Bubble” on the commercial design.

F. Contents of the Filing

The modifications to our billing statement adhere to ARSD 20:10:17:03 and billing statement versions previously approved by Commission Orders. These modifications are expected to:

- Improve customer satisfaction by providing a billing statement to customers that is easier to understand.
- Reduce customers’ need to call by providing easy access to our billing terms and rules by providing a direct reference via QR code and a direct URL.
- Provide more information to customers about mandatory riders via QR code and a direct URL.
- Provide a two-year graph with consumption and temperature overlay for monthly or annual comparisons.
- Provide at-a-glance daily averages for kWhs used and associated cost.
- Bring Even Monthly Payment information into one main area of the bill and include additional details for ease of understanding.
- Provide a summary section of account charges that provides information on all payments and adjustments in the billing cycle with detailed information to support that summary.

- Provide easy access to our online platform by providing direct references to that site on the bill via QR code and a direct URL.

Attached to this Petition are the following:

Attachment 1 – Redesigned Standard Electric Service Statement

Attachment 2 – Billing Content Compliance with Rules List

Attachment 3 – New Commercial Electric Service Statement

Attachment 4 – Redesigned Notice of Proposed Disconnection

Attachment 5 – Tariff Sheets (Redline and Clean Version)

Attachment 6 – Report of Tariff Schedule Change

Attachment 1 is a sample of our new standard billing statement that includes reference indicators for the requirements as identified on the Billing Content Compliance List included with this filing as Attachment 2. Attachment 3 is a sample of our new commercial billing statement and Attachment 4 is our updated Disconnection Notice. Included as Attachment 5 to this filing are redline and clean versions of the pages in our tariff described on page 3 of this Petition at Section III, D. The current Electric Service Statement will be described as our Standard Electric Service Statement and our Adjusted Electric Service Statement has been replaced with our new Commercial Electric Service Statement as described above. Lastly, the Report of Tariff Schedule Change is included as Attachment 6.

The modifications to our Disconnection Notice are largely color and formatting to match the new design of our billing statement. The account number, disconnect date, and disconnect amount are clearly called out using specific color on the bill. The remittance stub consists of the disconnect amount as well as the total amount due on the account. These amounts may not always be the same, and we want to encourage customers to pay in full, if possible, by providing them this information. The remaining language has been rearranged to give our customers a clearer and more concise message.

G. Customer Information Brochure

We recognize the need to update the current version of our South Dakota Customer Information Brochure with a sample of this new redesigned bill. This new bill sample will be updated in the brochure and the brochure will be included with the compliance filing in this matter.

H. Manual Billing Exception

Currently Otter Tail has one manually billed customer in South Dakota. This customer is on complex hourly rates and billed outside of our CIS. Their customer bill and additional reporting is produced using different software. We have determined that our current software cannot support the graphics in our new billing statement design without a significant investment.

For this reason, we are asking for an exception to implement this new bill design for those customers whose bills are calculated using a separate billing system, until our CIS is able to process those bills. As of the date of this filing, this timeline is unknown.

I. Communication Plan and Customer Notice

We plan to reach our customers through many different channels, including bill inserts, social media, our Customer Connection newsletter, and our website. We will use the “How to Read My Bill” section of our website to explain the new bill format to our customers. When discussing the best communication plan during our research phase, other utilities indicated that the best approach was to begin communicating with customers close to the actual implementation date. While we do plan to share information with our customers two to three months in advance, we expect the most significant distribution of information to occur one month prior to our implementation date.

Notice in the form of a bill message will be included on customer’s September bills pursuant to ARSD 20:10:13:19. Upon receiving Commission approval, in accordance with ARSD 20:10:13:17, we will deliver to each customer a notice, in the form of a bill insert, informing them of the approval of our new billing statement designs, disconnection notice, and the amended rate schedule.

V. CONCLUSION

For the reasons set forth in this Petition, we respectfully request Commission approval of the following by December 1, 2023:

- Proposed Standard and Commercial Electric Service Statements.
- Proposed Customer Disconnection Notice.
- Tariff changes necessary to implement the proposed changes.
- A Manual Bill Exception for manually billed customers.

- Extension of time to submit the compliance filing in this matter to 60 days prior to the effective date, which is March 1, 2024.

Following approval, Otter Tail anticipates implementation of our new billing statement design on May 1, 2024.

Date: August 18, 2023

Respectfully submitted,

OTTER TAIL POWER COMPANY

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