

**OTTER TAIL POWER COMPANY**

Docket No: EL25-015

Response to: SD Public Utilities Commission

Analyst: Logan Schaeftbauer

Date Received: May 14, 2025

Date Due: May 28, 2025

Date of Response: May 28, 2025

Responding Witness: Christopher Waltz, Conservation Sales Manager, 218-739-8492

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Data Request:

Explain why the energy adjustment rider and phase-in rider should not be applied to the non-firm usage.

Attachments: 0

Response:

This response includes information Otter Tail Power deems to be Confidential Information under ARSD 20:10:01:39 and is provided on the condition that it is not filed or otherwise publicly disclosed pending a determination under ARSD 20:10:01:41 and 20:10:01.42, or an agreement by the parties to this proceeding regarding its disclosure. Such Confidential Information is marked “CONFIDENTIAL” and noted where applicable as [PROTECTED DATA BEGINS... ...PROTECTED DATA ENDS].

The Phase-In Rider and Energy Adjustment Rider should not be applied to the non-firm load for the following reasons:

1. **[PROTECTED DATA BEGINS...**

**...PROTECTED DATA ENDS]** Thermal Market Energy

Pricing (TMEP) rider loads will not rely upon Otter Tail Power’s own generation resources.

2. The non-firm load of TMEP customers will be registered as separate Asset Owners in Midcontinent Independent System Operator (MISO) allowing costs related to energy procured for the loads in both the Day Ahead (DA) and Real Time (RT) markets to be isolated in separate MISO settlement statements from other customers and to be charged directly to the TMEP customer. Also, OTP is not including the non-firm load of TMEP customers in its planning for customer requirements in the EAR.