OTTER TAIL POWER COMPANY Docket No: EL25-017

Response to: SD Public Utilities Commission

Analyst: Amanda Reiss

Date Received: May 29, 2025 Date Due: June 11, 2025

Date of Response: June 11, 2025

Responding Witness: Amber Grenier, Manager, Regulatory Economics, 218-739-8728

Data Request:

Refer to docket EL25-018. Does Otter Tail object to Big Stone Energy Storage Project, LLC's (BSESP) request that the Commission find the EEP is not applicable to the non-firm, charging load for BSESP's thermal energy storage system? If yes, please explain. If not, explain why Otter Tail did not propose to include the EEP exemption in the TMEP tariff for the non-firm load for all similar thermal storage customers.

Attachments: 0

Response:

Otter Tail Power does not oppose BSESP's request for the Commission to determine that the EEP should not apply to the non-firm charging load of BSESP's thermal energy storage system. We did not propose an explicit EEP exemption in the TMEP tariff because South Dakota currently lacks rules on which types of load qualify for such exemptions. Without defined criteria, we were unsure whether other TMEP customers would also be eligible.