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December 23, 2015



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

**Re: In the Matter of the Consideration of Rules Regarding Stray Electrical Current and Voltage Remediation
Docket No. RM15-001
Responsive Comments**

Dear Ms. Van Gerpen:

Otter Tail Power Company (Otter Tail) thanks you for this opportunity to provide comments on the rule making and development regarding Stray Voltage in the State of South Dakota.

Below are Otter Tail's thoughts on modifications to the proposed rules:

1. We would suggest that the "Testing Sequence" be revised to a 24 hour test or two milking cycles rather than the current proposed 48 hour test sequence reflected in the following sections:
 - a. 20:10:39:16
 - b. 20:10:39:17
 - c. 20:10:39:18
 - d. 20:10:39:19
 - e. 20:10:39:27
 - f. 20:10:39:34
 - g. 20:10:39:35
 - h. 20:10:39:36
 - i. 20:10:39:37
 - j. 20:10:39:38
 - k. 20:10:39:44
 - l. 20:10:39:48
 - m. 20:10:39:49 (8)
 - n. 20:10:39:54
 - o. 20:10:39:56

Otter Tail looks forward to working with the South Dakota Public Utilities Commission and other interested parties regarding this rule making process.

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If you have any questions regarding this filing, please contact me at 218-739-8475 or bgerhardson@otpc.com.

Sincerely,

/s/ BRUCE G. GERHARDSON
Bruce G. Gerhardson
Associate General Counsel

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Enclosures
By electronic filing