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May 1, 2008

VIA EMAIL AND US MAIL

Honorable Al Wahl
Office of Administrative Hearings
1707 North 9th Street
Bismarck, North Dakota 58501-1882

**Re: Montana Dakota Utilities Co., and Otter Tail Corporation; Advance
Determination of Prudence, Big Stone II Generating Station
Case Nos. PU-06-481 and PU-06-482**

Dear Judge Wahl:

Enclosed for filing in the above matter please find an original and seven copies of the late filed OTP/MDU Exhibit Nos. 351 and 352; and an Affidavit of Service.

Please direct any questions to Montana-Dakota's Mr. Daniel Kuntz (701-530-1016), Otter Tail's Mr. Mark Bring (218-998-7152), or to the undersigned.

Thank you for your consideration.

Very truly yours,



Todd J. Guerrero

TJG/kas
cc: Attached Service List (w/encl.)

OTP/MDU EXHIBIT 351

U.S. DEMONSTRATED RESERVE BASE OF COAL BY MINING METHOD (million short tons remaining as of January 1, 2007)

| | Demonstrated Reserves in place | | | | Estimated Recoverable | |
|-------------------|--------------------------------|--------------------------|------------------------|--------------------|--------------------------|--------------------|
| | Underground- Minable Coal | Surface- Minable Coal | Total Coal Reserves | % of U.S. Total | Estimated Recoverable | % of U.S. Total |
| Alabama | 986 | 3,188 | 4,174 | 0.8% | 2,767 | 1.0% |
| Alaska | 5,423 | 685 | 6,108 | 1.2% | 2,832 | 1.1% |
| Arizona | - | - | - | - | - | - |
| Arkansas | 272 | 144 | 417 | 0.1% | 228 | 0.1% |
| Colorado | 11,397 | 4,761 | 16,158 | 3.3% | 9,727 | 3.7% |
| Georgia | 2 | 2 | 4 | 0.0% | 2 | 0.0% |
| Idaho | 4 | - | 4 | 0.0% | 2 | 0.0% |
| Illinois | 87,865 | 16,543 | 104,408 | 21.3% | 37,978 | 14.4% |
| Indiana | 8,720 | 711 | 9,431 | 1.9% | 4,027 | 1.5% |
| Iowa | 1,732 | 457 | 2,189 | 0.4% | 1,127 | 0.4% |
| Kansas | - | 972 | 972 | 0.2% | 680 | 0.3% |
| Kentucky | 16,909 | 12,906 | 29,814 | 6.1% | 14,785 | 5.6% |
| Louisiana | - | 416 | 416 | 0.1% | 309 | 0.1% |
| Maryland | 572 | 62 | 634 | 0.1% | 356 | 0.1% |
| Michigan | 123 | 5 | 128 | 0.0% | 59 | 0.0% |
| Mississippi | - | - | - | - | - | - |
| Missouri | 1,479 | 4,510 | 5,989 | 1.2% | 3,846 | 1.5% |
| Montana | 70,957 | 48,220 | 119,177 | 24.3% | 74,901 | 28.4% |
| New Mexico | 6,142 | 5,951 | 12,093 | 2.5% | 6,965 | 2.6% |
| North Carolina | 11 | - | 11 | 0.0% | 5 | 0.0% |
| North Dakota | - | 9,015 | 9,015 | 1.8% | 6,877 | 2.6% |
| Ohio | 17,515 | 5,745 | 23,260 | 4.7% | 11,466 | 4.3% |
| Oklahoma | 1,230 | 321 | 1,551 | 0.3% | 798 | 0.3% |
| Oregon | 15 | 3 | 17 | 0.0% | 9 | 0.0% |
| Pennsylvania | 23,113 | 4,236 | 27,349 | 5.6% | 11,687 | 4.4% |
| South Dakota | - | 366 | 366 | 0.1% | 277 | 0.1% |
| Tennessee | 508 | 262 | 770 | 0.2% | 456 | 0.2% |
| Texas | - | 12,328 | 12,328 | 2.5% | 9,490 | 3.6% |
| Utah | 5,076 | 268 | 5,344 | 1.1% | 2,700 | 1.0% |
| Virginia | 1,093 | 548 | 1,642 | 0.3% | 785 | 0.3% |
| Washington | 1,332 | 8 | 1,340 | 0.3% | 681 | 0.3% |
| West Virginia | 29,015 | 3,691 | 32,706 | 6.7% | 17,814 | 6.8% |
| Wyoming | 42,499 | 20,762 | 63,261 | 12.9% | 40,144 | 15.2% |
| U.S. Total | 333,991 | 157,085 | 491,076 | 100.0% | 263,781 | 100.0% |

Source: Developed from U.S. Dept. of Energy, Energy Information Administration, *Annual Coal Report 2006*, November 2007, Table 15, page 31, "Recoverable Coal Reserves at Producing Mines, Estimated Recoverable Reserves, and Demonstrated Reserve Base by Mining Method, 2006," <http://tonto.eia.doe.gov/FTP/ROOT/coal/05842006.pdf>.

Notes: (1) The demonstrated reserve base includes publicly available data on coal mapped to measured and indicated degrees of accuracy and found at depths and in coalbed thicknesses considered technologically minable at the time of determinations. (2) In some coal-producing states, such as Arizona and Mississippi, absence of publicly available results in no values for inclusion in the demonstrated reserve base. (3) The effective date for the demonstrated reserve base, as customarily worded, is "Remaining as of January 1, 2007." (4) EIA's estimated recoverable reserves include the coal in the demonstrated reserve base considered recoverable after excluding coal estimated to be unavailable due to land use restrictions or currently economically unattractive for mining, and after applying assumed mining recovery rates.

OTP/MDU EXHIBIT 352
WORLD ESTIMATED RECOVERABLE COAL
(million short tons)

| <u>Region/Country</u> | <u>Recoverable Anthracite and Bituminous</u> | <u>Recoverable Lignite and Subbituminous</u> | <u>Total Recoverable Coal</u> | <u>Percent of World Total</u> |
|------------------------------------|--|--|---------------------------------------|---------------------------------------|
| Canada | 3,826 | 3,425 | 7,251 | 0.73% |
| Greenland | 0 | 202 | 202 | 0.02% |
| Mexico | 948 | 387 | 1,335 | 0.13% |
| United States | 123,746 | 143,808 | 267,554 | 26.82% |
| North America | 128,520 | 147,821 | 276,342 | 27.70% |
| Argentina | 0 | 467 | 467 | 0.05% |
| Bolivia | 1 | 0 | 1 | 0.00% |
| Brazil | 0 | 11,148 | 11,148 | 1.12% |
| Chile | 34 | 1,268 | 1,302 | 0.13% |
| Colombia | 6,867 | 420 | 7,287 | 0.73% |
| Ecuador | 0 | 26 | 26 | 0.00% |
| Peru | 1,058 | 110 | 1,168 | 0.12% |
| Venezuela | 528 | 0 | 528 | 0.05% |
| Central & South America | 8,489 | 13,439 | 21,928 | 2.20% |
| Western Europe | 1,571 | 34,918 | 36,489 | 3.66% |
| Albania | 0 | 875 | 875 | 0.09% |
| Austria | 0 | 22 | 22 | 0.00% |
| Bulgaria | 4 | 2,406 | 2,411 | 0.24% |
| Croatia | 7 | 36 | 43 | 0.00% |
| Czech Republic | 2,308 | 3,812 | 6,120 | 0.61% |
| Former Serbia&Montenegro | 10 | 18,279 | 18,288 | 1.83% |
| France | 17 | 0 | 17 | 0.00% |
| Germany | 202 | 7,227 | 7,428 | 0.74% |
| Greece | 0 | 4,299 | 4,299 | 0.43% |
| Hungary | 218 | 3,482 | 3,700 | 0.37% |
| Ireland | 15 | 0 | 15 | 0.00% |
| Italy | 0 | 37 | 37 | 0.00% |
| Netherlands | 548 | 0 | 548 | 0.05% |
| Norway | 0 | 6 | 6 | 0.00% |
| Poland | 15,432 | 0 | 15,432 | 1.55% |
| Portugal | 3 | 36 | 40 | 0.00% |
| Romania | 24 | 520 | 545 | 0.05% |
| Slovakia | 0 | 190 | 190 | 0.02% |
| Slovenia | 0 | 303 | 303 | 0.03% |
| Spain | 220 | 364 | 584 | 0.06% |
| Sweden | 0 | 1 | 1 | 0.00% |
| Turkey | 306 | 4,308 | 4,614 | 0.46% |
| United Kingdom | 243 | 0 | 243 | 0.02% |
| Europe | 19,558 | 46,203 | 65,762 | 6.59% |

Exhibit continued on following page.

OTP/MDU EXHIBIT 352 (continued)
WORLD ESTIMATED RECOVERABLE COAL
(million short tons)

| <u>Region/Country</u> | <u>Recoverable Anthracite and Bituminous</u> | <u>Recoverable Lignite and Subbituminous</u> | <u>Total Recoverable Coal</u> | <u>Percent of World Total</u> |
|---------------------------|--|--|-------------------------------|-------------------------------|
| Kazakhstan | 31,031 | 3,448 | 34,479 | 3.46% |
| Kyrgyzstan | 0 | 895 | 895 | 0.09% |
| Russia | 54,110 | 118,964 | 173,074 | 17.35% |
| Ukraine | 17,939 | 19,708 | 37,647 | 3.77% |
| Uzbekistan | 1,102 | 3,307 | 4,409 | 0.44% |
| Eurasia | 104,183 | 146,322 | 250,505 | 25.11% |
| Iran | 462 | 0 | 462 | 0.05% |
| Middle East | 462 | 0 | 462 | 0.05% |
| Algeria | 44 | 0 | 44 | 0.00% |
| Botswana | 44 | 0 | 44 | 0.00% |
| Central African Republic | 0 | 3 | 3 | 0.00% |
| Congo (Kinshasa) | 97 | 0 | 97 | 0.01% |
| Egypt | 23 | 0 | 23 | 0.00% |
| Malawi | 0 | 2 | 2 | 0.00% |
| Mozambique | 234 | 0 | 234 | 0.02% |
| Niger | 77 | 0 | 77 | 0.01% |
| Nigeria | 23 | 186 | 209 | 0.02% |
| South Africa | 53,738 | 0 | 53,738 | 5.39% |
| Swaziland | 229 | 0 | 229 | 0.02% |
| Tanzania | 220 | 0 | 220 | 0.02% |
| Zambia | 11 | 0 | 11 | 0.00% |
| Zimbabwe | 553 | 0 | 553 | 0.06% |
| Africa | 55,294 | 192 | 55,486 | 5.56% |
| Afghanistan | 73 | 0 | 73 | 0.01% |
| Australia | 42,549 | 43,982 | 86,531 | 8.67% |
| Burma | 2 | 0 | 2 | 0.00% |
| China | 68,564 | 57,651 | 126,215 | 12.65% |
| East Timor | NA | NA | NA | NA |
| India | 99,302 | 2,601 | 101,903 | 10.21% |
| Indonesia | 816 | 4,661 | 5,476 | 0.55% |
| Japan | 396 | 0 | 396 | 0.04% |
| North Korea | 331 | 331 | 661 | 0.07% |
| Korea, South | 0 | 88 | 88 | 0.01% |
| Malaysia | 4 | 0 | 4 | 0.00% |
| Nepal | 0 | 1 | 1 | 0.00% |
| New Caledonia | 2 | 0 | 2 | 0.00% |
| New Zealand | 36 | 593 | 629 | 0.06% |
| Pakistan | 0 | 3,362 | 3,362 | 0.34% |
| Philippines | 24 | 236 | 260 | 0.03% |
| Taiwan | 1 | 0 | 1 | 0.00% |
| Thailand | 0 | 1,493 | 1,493 | 0.15% |
| Vietnam | 165 | 0 | 165 | 0.02% |
| Asia & Oceania | 212,265 | 114,999 | 327,264 | 32.80% |
| World Total | 528,772 | 468,976 | 997,748 | 100.00% |

Exhibit continued on following page.

OTP/MDU EXHIBIT 352 (continued)
WORLD ESTIMATED RECOVERABLE COAL
(million short tons)

Source: Developed from U.S. Dept. of Energy, Energy Information Administration, *International Energy Annual 2005*, June 2007. Table 8.2, "World Estimated Recoverable Coal," <http://www.eia.doe.gov/pub/international/iea2005/table82.xls>. In that spreadsheet, U.S. data from EIA, unpublished file data of the Coal Reserves Data Base (April 2007). All Other Countries: World Energy Council, *Survey of Energy Resources 2004*, December 13, 2004.

Notes (from [http://www.eia.doe.gov/emeu/iea/Notes for Table 8_2.html](http://www.eia.doe.gov/emeu/iea/Notes%20for%20Table%208_2.html)):

1. World Energy Council definition of "Proved Recoverable Reserves": Proved Recoverable Reserves are the tonnage within the Proved Amount in Place that can be recovered (extracted from the earth in raw form) under present and expected local economic conditions with existing available technology.
2. Data for the United States represent both measured and indicated tonnage, as of January 1, 2006 (equated to December 31, 2005). The U.S. term "measured" approximates the term "proved" used by the World Energy Council. The U.S. "measured and indicated" data have been combined prior to depletion adjustments and cannot be recaptured as "measured alone."
3. The estimates in this table are dependent on the judgment of each reporting country to interpret local economic conditions and its own mineral assessment criteria in terms of specified standards of the World Energy Council. Consequently, the data may not all meet the same standards of reliability and some data, including the Energy Information Administration's (EIA)'s, may not represent reserves of coal that are known to be recoverable under current economic conditions and regulations. Some data, including the EIA's, represent estimated recovery rates for highly reliable estimates of coal quantities in the ground that have physical characteristics like those of coals currently being profitably mined. U.S. coal rank approximations are based partly on Btu and may not match precisely borderline geologic ranks. Further, data in this table may represent different base years. Data for the U.S. represent recoverable coal estimates as of December 31, 2005. Data for other countries are as of December 31, 2002, the most recent period for which they are available. The Energy Information Administration does not certify the international reserves data but reproduces the information as a matter of convenience for the reader.
4. Sum of components may not equal total due to independent rounding.

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Otter Tail Corporation, Advance
Determination of Prudence
Application

AFFIDAVIT OF SERVICE

Montana-Dakota Utilities Co.,
a Division of MDU Resources Group,
Inc., Advance Determination of Prudence
Application

Case Nos. PU-06-481, PU 06-482

Kristen A. Swenson, of the City of Minneapolis, County of Hennepin, in the State of North Dakota, being duly sworn on oath says: that on the 1st day of May, 2008, she served the following:

Late Filed OTP/MDU Exhibit Nos. 351 and 352; and
An Affidavit of Service.

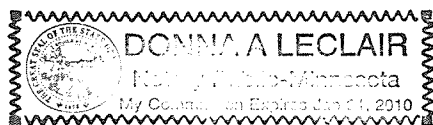
A copy has also been served upon the attached service list via electronic mail and U.S. Mail.

Kristen Swenson

Subscribed and sworn to before me
this 1st day of May, 2008.

Donna A Leclair

Notary Public



STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Otter Tail Corporation, Advance
Determination of Prudence
Application

SERVICE LIST

Montana-Dakota Utilities Co.,
a Division of MDU Resources Group,
Inc., Advance Determination of Prudence
Application

Case Nos. PU-06-481, PU 06-482

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North Dakota Public Service Commission
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