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November 5, 2019



Mr. Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0408

**RE: Ashtabula Wind Energy Center, Barnes County, ND
Case No. PU-09-245
Financial Assurance – Self Guaranty**

Dear Mr. Kahl:

This report has been electronically filed. Enclosed in the above-referenced matter are an original and seven (7) copies of Otter Tail Power Company's Self-Guaranty as financial assurance for its decommissioning obligations for the Ashtabula Wind Energy Center. The enclosed Self-Guaranty replaces the financial assurance Otter Tail previously filed in Case No. PU-09-245.

By way of background, on January 11, 2019 Otter Tail Power Company (Otter Tail) submitted an updated Decommissioning Plan for the portion of the Ashtabula Wind Energy Center owned by Otter Tail. The filing included an updated plan, cost estimate, and financial assurance. On June 12, 2019, the North Dakota Public Service Commission (Commission) held an informal hearing on Otter Tail's filing. On July 12, 2019 Otter Tail submitted a revised plan, cost estimate, and financial assurance addressing issues raised by the Commission at the informal hearing. On September 4, 2019 the Commission approved Otter Tail's revised plan and cost estimate. The Commission did not act on Otter Tail's proposed financial assurance. Instead the Commission noted that it preferred that Otter Tail submit a self-guaranty or other form of financial assurance specifically referenced by North Dakota Admin. Code 69-09-09-08 (3). The enclosed Self-Guaranty is consistent with the Commission's directive.

Please contact me at (218) 739-8956, or cstephenson@otpco.com should you have any questions with respect to this filing.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Cary Stephenson", with a long horizontal flourish extending to the right.

Cary Stephenson
Associate General Counsel

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Enclosure
By electronic filing

12 **PU-09-245** Filed: 11/5/2019 Pages: 6
Updated Financial Assurance – Self-Guarantee