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ORIGINAL

July 20, 2012

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PUBLIC SERVICE COMMISSION

Mr. Darrel Nitschke
Executive Secretary
Public Service Commission
State Capitol - 600 East Boulevard
Bismarck, ND 58505-0480

RE: Electric Master Metering Rulemaking
Case No. PU-12-162 and PU-12-165

Dear Mr. Nitschke:

On May 30, 2012, the North Dakota Public Service Commission ("Commission") issued a Notice of Intent to Amend Administrative Rules concerning discovery response times, National Electrical Safety Code, master metering (Case No. PU-12-162) and Energy Conversion and Transmission Facility Siting (Case No. PU-12-165). The Commission set a written comment deadline of July 23, 2012. Otter Tail Power Company ("Otter Tail" or the "Company") does not oppose any of the proposed amendments or changes to the rules in either of the above cases. However, Otter Tail would like to provide brief comments on Commission's proposal to repeal the master metering rule, which is part of Case No. PU-12-162.

Otter Tail's current general rules and regulations Section 2.02 reference and cite the North Dakota rules 69-09-02-37, which addresses the prohibition and exceptions on electric master metering of buildings in the state of North Dakota. If the Commission chooses to repeal the rule on master metering, Otter Tail will need to submit a filing to update its general rules and regulations, Section 2.02. If the rules on master metering are repealed, Otter Tail plans to monitor the activity associated with customers served through a master meter in order to determine if in the future the Company should submit a proposal for criteria to be satisfied in order for a customer to be served through a master metering.

Otter Tail appreciates the opportunity to offer these comments for your consideration. If you have questions, don't hesitate to contact me at (218) 739-8838 or rlspangler@otpc.com.

Very truly yours,

A handwritten signature in cursive script that reads "Ron L. Spangler Jr. - jce".

Ron L. Spangler Jr.
Rate Case Manager, Tariff Application and Compliance

By electronic filing and U.S. Mail

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Comments
Otter Tail Power Company

19 PU-12-162 Filed 07/23/2012 Pages: 1
Comments
Otter Tail Power Company