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February 1, 2018

Richard J. Savelkoul
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VIA EMAIL (NDPSC@ND.GOV) AND U.S. MAIL

North Dakota Public Service Commission
Executive Secretary
600 East Boulevard, Department 408
Bismarck, ND 58505-0480

Re: ND PUC Docket PU-17-398/Otter Tail Power Rate Increase
Our File No. 2035-17

Dear Sir or Madam:

Attached please find Midwest Large Energy Consumers' Petition to Intervene in the above-referenced docket. Please add the following to the official service list for this matter:

Richard Savelkoul
Martin & Squires, P.A.
332 Minnesota Street, Suite W2750
St. Paul, MN 55101
rsavelkoul@martinsquires.com

Kavita Maini
KM Energy Consulting, LLC
961 North Lost Woods Road
Oconomowoc, WI 53066
kmaini@visi.com

Also, attached is the Certificate of Service. The original and seven (7) copies of these documents will follow by U.S. Mail.

Thank you for your attention to this matter. Please let me know if you have any questions.

Very truly yours,

/s/ Richard J. Savelkoul
Richard J. Savelkoul

RJS:lmr
Enclosures

cc: Service List (w/encl)

45 PU-17-398 Filed 02/01/2018 Pages: 6
Petition to Intervene
Midwest Large Energy Consumers
Richard Savelkoul, Attorney

STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
Otter Tail Power Company for)
Authority to Increase Rates for)
Electric Service in North Dakota)
)

Docket No. PU-17-398

CERTIFICATE OF SERVICE

Leanne M. Rogers certifies that on the 1st day of February, 2018, she served a true and correct copy of the attached PETITION TO INTERVENE by email and placing it in the United States Mail with postage prepaid, addressed to the following individuals:

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
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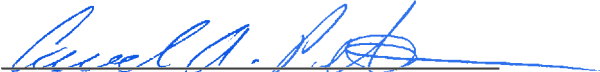
Talbot J. Wiczorek
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Stephen W. Chriss
Wal-Mart Legal Department
2001 SE 10th Street
Bentonville, AR 72715-5560
Stephen.chriss@wal-mart.com



Leanne M. Rogers

Subscribed and sworn to before me this
1 day of February, 2018



Notary Public



STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of)
Otter Tail Power Company for)
Authority to Increase Rates for)
Electric Service in North Dakota)
)

Docket No. PU-17-398

**PETITION TO INTERVENE BY
MIDWEST LARGE ENERGY
CONSUMERS GROUP**

“Midwest Large Energy Consumers Group” or “MLEC,” by and through its undersigned counsel and pursuant to North Dakota Administrative Code 69-02-02-05, hereby petitions the North Dakota Public Services Commission (“Commission”) for intervention in the above-captioned proceedings filed by Otter Tail Power Company (“Otter Tail”). In support thereof, MLEC states as follows:

1. ND Admin. Code 69-02-02-05 provides that a petition to intervene “must be in writing and must set forth the grounds for intervention, the position and interest of the petitioner in the proceeding, what the petitioner would contribute to the hearing and whether the petitioner’s position is in support of or in opposition to the relief sought.”
2. On November 2, 2017, Otter Tail filed an Interim Rate Petition in the above-entitled Docket, to make changes in its charges for electric services provided to its North Dakota customers.
3. MLEC are Otter Tail ratepayers that may be adversely affected by the proposed increase in rates submitted to the Commission. As large commercial Otter Tail customers, MLEC has direct financial interest in all cost of service, rate, design and policy determinations by the Commission in this proceeding.

4. MLEC may present evidence through testimony, as well as cross-examination, including, but not limited to the following issues:

(a) appropriate rate of return and the cost of equity matters that Otter Tail should be entitled to;

(b) appropriate expenses that should be recovered by ratepayers; and

(c) appropriate adjustments to costs of service studies and rate design issues, if any.

5. MLEC's interest in the outcome of these proceedings will not be adequately represented by any other party, nor will MLEC's participation delay this proceeding.

6. MLEC timely requests intervention in this proceeding.

7. A copy of this petition to intervene in this proceeding has been served on all parties to this proceeding. Copies of all notices, orders or pleadings in this should be served on:

Richard Savelkoul
Martin & Squires, P.A.
332 Minnesota Street, Suite W2750
St. Paul, MN 55101
Email: rsavelkoul@martinsquires.com

With copies to:

Kavita Maini
KM Energy Consulting, LLC
961 North Lost Woods Road
Oconomowoc, WI 53066
Email: kmmaini@visi.com

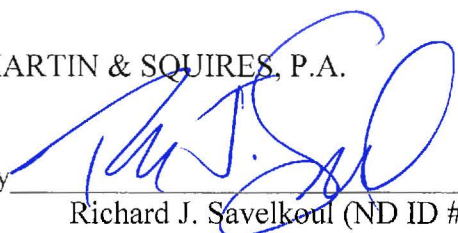
WHEREFORE, for the reasons set forth above-, MLEC requests that the Commission grant this timely Petition to Intervene and permit MLEC to participate in this proceeding with full rights as a party.

Respectfully submitted,

Dated: February 1, 2018

MARTIN & SQUIRES, P.A.

By



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**ATTORNEY FOR MIDWEST
LARGE ENERGY CONSUMERS
GROUP**