

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)



August 20, 2019

Steve Kahl
Executive Secretary and Director of Administration
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480

**PUBLIC DOCUMENT – NOT
PUBLIC (OR PRIVILEGED)
DATA HAS BEEN EXCISED**

**RE: In the Matter of Otter Tail Power Company's Application for a Certificate of Public Convenience and Necessity
Case No. PU-19-**

Dear Mr. Kahl:

Pursuant to Pursuant to N.D.C.C. Chapter 49-03-01 and N.D.A.C. § 69-02-02-04, Otter Tail Power Company (Otter Tail or the Company) respectfully submits this Application for a Certificate of Public Convenience and Necessity seeking approval of the the North Dakota Public Service Commission (Commission) in order for Otter Tail to acquire from Central Power Electric Cooperative certain North Dakota-sited substation facilities and substation-related assets located at the Bottineau Substation, Wahpeton Substation and Rugby Substation, along with acquiring an approximately 4-mile-long CPEC-owned 69 kV line segment from what is otherwise Otter Tail's 69 kV Rolette Line (Rolette County, ND) (collectively the Purchased Assets), subject to regulatory approvals. As reflected in the attached Certificate of Service, the Summary has been served on all parties on Otter Tail's General Service List.

The Company's Attachment 1 contains trade secret information. In accordance with N.D. Admin. Code § 69-02-09-02, an Application for Trade Secret Protection is being provided along with a single copy of the trade secret version of the Application and supporting testimony in a sealed envelope marked **PROTECTED INFORMATION – PRIVATE**.

Mr. Kahl
August 20, 2019
Page 2

An original and seven copies of the Company's Compliance Filing are being sent via mail. Please contact me at 218-739-8956 or cstephenson@otpc.com if you have any questions regarding this filing.

Very truly yours,

/s/ Cary Stephenson
Cary Stephenson
Associate General Counsel

Enclosures
By electronic filing
cc: Service List20
Debra Hoffarth, CPEC

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

In the Matter of the Application of)
Otter Tail Power Company, a Minnesota) Case No. PU-19-
Corporation, for a Certificate of)
Public Convenience and Necessity for)
Otter Tail’s Acquisition of Certain Utility)
Assets from Central Power Electric)
Cooperative)
)

**APPLICATION FOR
CERTIFICATE OF PUBLIC CONVENIENCE
AND NECESSITY**

Pursuant to N.D.C.C. Chapter 49-03-01 and N.D.A.C. § 69-02-02-04, Otter Tail Power Company (Otter Tail or the Company or Applicant), a Minnesota Corporation, respectfully submits this application (Application) for a Certificate of Public Convenience and Necessity (CPCN) for approval of the acquisition (Proposed Acquisition) and for all other necessary regulatory approvals from the North Dakota Public Service Commission (Commission) for Otter Tail to acquire and own the following facilities, as the Applicant’s proposed purchase from Central Power Electric Cooperative (Central Power or CPEC):

- CPEC equipment within the Otter Tail Bottineau 115-43.8kV Substation (“Bottineau Equipment”);
- CPEC equipment within the Otter Tail Wahpeton 230-115-43.8kV Substation (“Wahpeton Equipment”);
- CPEC equipment within the Otter Tail Rugby 230-115-43.8kV Substation (“Rugby Equipment”); and
- CPEC’s Rolette line segment – OTP Rolette four-mile long 69kV line (“Rolette Line Segment”).

The sale of the above four assets at the four locations, together being the “Purchased Assets,”¹ is subject to closing and all applicable regulatory approvals, including the approval

¹ The actual controlling details and more detailed description of the Purchased Assets at the four locations defined here are contained at Attachment A-1 of Exhibit A to the Asset Purchase Agreement ((Attachment

sought from the Commission through this instant Application.

The Proposed Acquisition is mutually agreed upon by Otter Tail and CPEC based on a variety of benefits to be recognized by customers, as set forth and further detailed herein. The Proposed Acquisition will not extend service to retail customers and does not alter any currently defined service areas. Rather, the Proposed Acquisition provides clarity by resulting in more seamless ownership of facilities that comprise the transmission system that support the retail distribution of electric power to customers in North Dakota, notably in the areas of Bottineau, Wahpeton, Rugby, and Rolette, where the Purchased Assets are located.

A. STATUTORY PROVISIONS: PUBLIC CONVENIENCE AND NECESSITY

The statutory provision governing the requirement for an electric public utility to file for and obtain a CPCN is as follows:

N.D.C.C. § 49-03-01. Certificate of public convenience and necessity – Secured by electric public utility. No electric public utility henceforth shall begin construction or operation of a public utility plant or system, or of an extension of a plant or system...without first obtaining from the commission a certificate that public convenience and necessity require or will require such construction and operation. ...

Before the Commission may issue a CPCN, the electric public utility must file a certified copy of its articles of incorporation, and submit evidence that it has obtained, or will make application to obtain, the consent of any other public authority whose consent is required. N.D.C.C. § 49-03-02. After notice and opportunity for hearing, the Commission may: (i) issue the certificate; (ii) refuse to issue the certificate; (iii) issue the certificate for only portions of the proposed facilities; or (iv) issue the certificate subject to such terms and

hereto, the “Asset Purchase Agreement”). Otter Tail already operates these three substations and the other ~30 miles of the Rolette line today. Therefore, the Proposed Acquisition is limited to seeking approvals in order to complete and simplify the ownership and maintenance arrangements at those four locations on its system.

conditions the Commission determines the public convenience and necessity requires. The overall standard applied by the Commission pursuant to statute is whether the proposed system addition is appropriate under all the circumstances, and whether the applicant is qualified to implement the proposed system addition. N.D.C.C. § 49-03-02.² Consistent with N.D.C.C. § 49-03-02(2), Otter Tail respectfully requests the Commission approve the Proposed Acquisition without a hearing if no other interested party has requested a hearing on this Application after appropriate notice of the opportunity to do so.

Otter Tail believes the Proposed Acquisition requires approval by the Commission pursuant to N.D.C.C. § 49-03-02 as an electric public utility that seeks to extend its existing plant or system through acquiring the Purchased Assets. Furthermore, Otter Tail asserts the Proposed Acquisition is appropriate under all the circumstances and will be beneficial to the electric system and North Dakota customers, as is explained further below. Otter Tail is an experienced, safe, responsible and reliable owner and operator of electric generation, transmission and distribution assets and systems, and is highly qualified to implement incorporating the Purchased Assets into its transmission system in order to continue providing safe, reliable and cost-effective electric service for its customers.

B. DESCRIPTION OF THE APPLICANT AND COUNTER-PARTY

Applicant Otter Tail is an electric public utility and transmission owning member of the Midcontinent Independent System Operator, Inc. (“MISO”) and is headquartered in Fergus Falls, Minnesota. Otter Tail is engaged in the business of generating, transmitting and selling electric power and energy and related services and provides electricity to

² Otter Tail is not serving any new customers and is not seeking any alteration or change in any services being offered, nor any alteration of any public utility or other service territory in connection with this Application.

residential, industrial, farm, commercial, and municipal customers over a 70,000 square-mile area within Minnesota, North Dakota and South Dakota. Otter Tail presently serves more than 131,000 retail electric customers throughout its service territory. Otter Tail is a Transmission Owner in MISO and its transmission facilities are subject to the applicable provisions of the MISO Open Access Transmission, Energy and Operating Reserve Markets Tariff (“MISO Tariff”) and Otter Tail is a Network Customer under the applicable provisions of the Southwest Power Pool, Inc. (“SPP”) Open Access Transmission Tariff (“SPP Tariff”) and has certain transmission facilities that qualify for Facility Credits³ under the SPP Tariff.

Central Power is a wholesale electrical generation and transmission cooperative and a non-jurisdictional rural electric cooperative under North Dakota law. Headquartered in Minot, North Dakota, CPEC serves six CPEC-member distribution cooperatives, which in turn supply electricity to farms, homes and businesses located in a service area of 25 counties across the central and southeastern third of North Dakota, and as such is engaged in the business of, *inter alia*, transmitting, and selling electric power in the State of North Dakota. Central Power is also a Transmission Owner in SPP and has certain transmission facilities that are subject to the applicable provisions of the SPP Tariff. Furthermore, CPEC has certain transmission facilities that qualify for Facility Credits³ under the MISO Tariff.

C. BACKGROUND AND OVERVIEW OF THE PROPOSED ACQUISITION

As further detailed in the Purchase Agreement, CPEC allowed Otter Tail the exclusive right and option to purchase the Purchased Assets so long as Otter Tail provided

³ Facility Credits recognize and compensate entities that are not Transmission Owners in a Regional Transmission Organization (RTO), but that own eligible facilities that are integrated into the plans and operations of such RTO in order to serve the power and energy requirements of transmission customers taking transmission service under such RTO.

notice to CPEC on or before December 31, 2018. Otter Tail provided timely notice to CPEC to exercise its right to purchase all of the Purchased Assets at each location (occurring in December, 2018), which was followed by Otter Tail's due diligence review of the Purchased Assets (starting in January, 2019 which is expected to extend up until the closing date) and good faith negotiations of a purchase agreement (occurring March-July, 2019). CPEC and Otter Tail agreed to the Proposed Acquisition and indicated their intent by executing the purchase agreement in July, with final closing subject to all necessary regulatory approvals.

The exclusive option for Otter Tail to acquire the Purchased Assets from CPEC is subject to an "all or none" purchase arrangement at each location. The purchase price for the Purchased Assets will be fixed at CPEC's net book value of the equipment at the time of the closing. Because such purchase is subject to regulatory approvals in advance of closing, including the Commission's approval sought in connection with this Application, the exact amount for consummating the Proposed Acquisition will not be known until such time.⁴ Closing is contingent upon final regulatory approvals of this Commission and the Minnesota Public Utilities Commission. Otter Tail and CPEC presently envision closing within a reasonable amount of time following receipt of these regulatory approvals, ideally by the end of 2019.

D. BENEFITS OF THE PROPOSED ACQUISITION

The Proposed Acquisition described in this Application offers a variety of benefits, primarily centered around the efficiencies gained by more seamless ownership of facilities that comprise the transmission system that support the retail distribution of electric power to

⁴ As shown in Attachment 8 hereto, if the Proposed Acquisition were to close on December 31, 2019, the net book value would be approximately \$2.0 million (\$1,995,220). Limited further depreciation would likely further, but only slightly, decrease that value if the closing were to occur after December 31, 2019.

customers in North Dakota, notably in the areas of Bottineau, Wahpeton, Rugby and Rolette, where the Purchased Assets are located.

Currently, Otter Tail and CPEC both own equipment within the Wahpeton, Bottineau and Rugby Substations. The Proposed Acquisition will result in Otter Tail being the sole owner of all the equipment located within each of these substations. Likewise, CPEC's ownership of the four-mile Rolette Line Segment is the only segment of CPEC line along the entire 69 kV system between Rolette and Rolla, North Dakota – the rest of which is owned by Otter Tail (~30 miles). The Proposed Acquisition will result in Otter Tail owning the entire 69 kV system between Rolette and Rolla (~34 miles).

Continuous ownership of all the equipment within a substation or along an entire 69 kV system offers several efficiencies and benefits in the operation and maintenance of the system to promote providing safe, reliable and cost-effective electric service to Otter Tail's retail customers. Thus, for a relatively low acquisition cost, the Proposed Acquisition would increase Otter Tail's ability to efficiently manage more seamless transmission flows and has the potential to increase facility credits Otter Tail receives from SPP.

More specifically and more directly resulting from the Proposed Acquisition are the efficiencies gained in operations and maintenance due to Otter Tail already owning and operating transmission and distribution facilities in the vicinity of the Purchased Assets. Since Otter Tail is already performing operations and maintenance ("O&M") on its own facilities at many of the same locations, Otter Tail anticipates a negligible increase in incremental O&M expenses, which is anticipated to be offset by the financial benefits of the Proposed Acquisition, as described below. Otter Tail has nine Customer Service Centers across its service territory, four of which are in North Dakota and two of which are centered

in Wahpeton and Rugby. As a result, Otter Tail has personnel nearby to quickly identify, troubleshoot, repair and restore service during interruptions.

Likewise, sole and unified Otter Tail ownership of the Purchased Assets will avoid confusion and coordination challenges around who is responsible for what equipment during restoration efforts – a time that is usually chaotic due to multiple interruptions that could have been caused by more widespread storm damage. Continuous ownership should result in a safer, more efficient, and more reliable restoration process due to fewer coordination challenges.

Furthermore, shifting from multi-party ownership to sole ownership in the Wahpeton, Bottineau and Rugby substations reduces complexity with regard to complying with certain reliability standards enforced by the North American Electric Reliability Corporation (NERC). The Wahpeton, Bottineau and Rugby Substations currently have solely-owned equipment that is highly integrated between Otter Tail and CPEC. As a result of the current ownership arrangements, Otter Tail relies on CPEC equipment to ensure reliable operation of the transmission system in accordance with the applicable NERC reliability standards, and CPEC likewise relies on Otter Tail equipment. Sole ownership of all the equipment at each of these three substations as a result of the Proposed Acquisition will clarify NERC compliance obligations, reduce complexity and minimize reliance on one another at these locations thereby streamlining compliance obligations under the NERC reliability standards.

The Purchased Assets are an integral part of the transmission system that serve Otter Tail customers, especially those at or near their locations in North Dakota, including the towns of Bottineau, Wahpeton, Rugby and Rolette. Otter Tail estimates that the Wahpeton Equipment serves over 900 Otter Tail customers, the Bottineau Equipment serves over 1,100

Otter Tail customers, the Rolette Line Segment serves over 1,400 Otter Tail customers and the Rugby Equipment is integrated with the high voltage transmission network that indirectly supports a multitude of Otter Tail customers in the region. The Proposed Acquisition will result in Otter Tail obtaining ownership of the Purchased Assets at a much lower cost than if Otter Tail would have needed to install new facilities at these locations in order to maintain safe, reliable and cost-effective service to its customers.

Likewise, having control of facilities that directly serve Otter Tail customers offers the added assurance that the facilities are being operated and maintained in accordance with Otter Tail's standards. Furthermore, the Proposed Acquisition will also provide added certainty on the long-term availability of these assets with the ability to more easily leverage these facilities to meet future needs on Otter Tail's system without needing to rely on CPEC or CPEC's planning process.

Otter Tail will also recognize financial benefits as a result of the Proposed Acquisition, which are expected to be in the form of higher MISO revenues and lower SPP expenses – benefits that are passed back to Otter Tail's customers.

Otter Tail will experience higher MISO revenues due to a decrease in the amount of facility credits that CPEC obtains through MISO. Due to the integration of the Purchased Assets with other transmission facilities under MISO's Tariff, CPEC is currently receiving facility credits for their Wahpeton Equipment, Bottineau Equipment and the Rolette Line Segment. These facility credits reduce CPEC's Schedule 9 (Network Integration Transmission Service) expenses in MISO. The Proposed Acquisition will lower the amount of CPEC facility credits since CPEC will no longer own the Purchased Assets, which in turn will result in higher Schedule 9 expenses to CPEC that flow back to Otter Tail in the form of

more Schedule 9 revenues. These higher Schedule 9 revenues from CPEC are currently passed back to Otter Tail customers through its annual Transmission Cost Recovery Rider.

Otter Tail will also have lower SPP expenses as a result of the Proposed Acquisition because Otter Tail will be able to obtain higher facility credits in SPP, which in turn will reduce SPP Schedule 9 expenses. Similar to CPEC obtaining facility credits in MISO, Otter Tail will be able to obtain facility credits from SPP for the Rugby Equipment.⁵ As explained above, these facility credits reduce Otter Tail's Schedule 9 expenses in SPP. The Proposed Acquisition will increase the amount of Otter Tail facility credits since Otter Tail will now own the Rugby Equipment, which in turn will result in lower Schedule 9 expenses to Otter Tail. These lower Schedule 9 expenses are passed back to Otter Tail customers through its annual Transmission Cost Recovery Rider in North Dakota. The combined impacts of higher Schedule 9 revenues in MISO and lower Schedule 9 expenses in SPP will result in a financial benefit to Otter Tail's customers.

Lastly, the substation equipment and line segment that comprise the Purchased Assets addressed in this Application are in good working order and are suitable for providing continued reliable service to customers, especially those customers in North Dakota directly served by the facilities in and around Bottineau, Wahpeton, Rugby and Rolette. As part of its due diligence on the Purchased Assets, Otter Tail has reviewed past test records and performed on-site inspections to conclude that these facilities are in good working order, conform with Otter Tail's standards and are expected to continue to provide reliable service for many years into the future.

⁵ The Rugby Equipment currently qualifies as an eligible transmission facility under SPP's Tariff and is currently included as part of CPEC's annual transmission revenue requirement in SPP. Since the Proposed Acquisition will not change the configuration of the Rugby Equipment, Otter Tail expects it will be able to obtain SPP facility credits for the Rugby Equipment.

In conclusion, the Proposed Acquisition offers several quantitative and qualitative benefits to Otter Tail and is in the best interest of continuing to provide safe, reliable and cost-effective service to Otter Tail's customers.

E. COMMUNICATIONS AND SERVICE

Otter Tail respectfully requests that the following persons be placed on the Commission's official service list for all official communications in this case:

Cary Stephenson
Associate General Counsel
Otter Tail Corporation
215 South Cascade Street
Fergus Falls, MN 56537
Tel. 218-739-8956

JoAnn Thompson
Vice President Asset Management
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56537
Tel. 218-739-8594

F. APPLICATION FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

Otter Tail respectfully submits this Application for a Certificate of Public Convenience and Necessity for the Proposed Acquisition and respectfully requests that the Commission issue a CPCN after a notice of opportunity for hearing is issued and addressed in this proceeding. Otter Tail believes the benefits of the Proposed Acquisition are such that, if no other interested party has requested a hearing on this Application, that the Commission should move expeditiously in granting a CPCN consistent with N.D.C.C. Section 49-03-02(2). In support thereof, the Company states as follows:

1. That Applicant's full name and post office address are:

Otter Tail Power Company
P.O. Box 496
215 South Cascade Street
Fergus Falls, MN 56538-0496

2. Applicant is a Minnesota corporation duly authorized to do business in the State of North Dakota as a foreign corporation and is doing business in the State of North Dakota as a public utility subject to the jurisdiction of and regulation by the Commission under N.D.C.C. Title 49, as amended. Otter Tail Power Company maintains local offices in Jamestown, Wahpeton, Devils Lake and Rugby.

3. Applicant Otter Tail is a public utility corporation, subject to the jurisdiction of, and regulation by, the Public Service Commission of North Dakota, under Title 49, NDCC, as amended. Pursuant to N.D. Admin. Code § 69-02-02-04, Applicant Otter Tail's certified Articles of Incorporation and a Certificate of Good Standing are on file with the Commission in Commission Case No. PU-09-677, and an original certificate of good standing dated August 5, 2019 is attached hereto. Otter Tail's Annual Report and related financial statements and information are on file with the Commission as part of its annual electric report for 2018 in Case No. PU-19-188. Pursuant to N.D.A.C. § 69-02-02-04, such Articles, Certificate, most recent Annual Report and any Amendments thereto are hereby incorporated by reference, as though fully set forth herein.

4. The date the Proposed Acquisition will take effect is at the close of the Purchased Assets. The date of this filing is August 20, 2019.

5. This Application is being made pursuant to the provisions of Chapter 49-03-01 of the North Dakota Century Code. Similar consent/approval from the Minnesota Public Utilities Commission, pursuant to Minnesota Statute § 216B.50 and Minnesota Rules 7825.1700 and 7825.1800, is also necessary as a regulatory approval in order to effectuate the Proposed Acquisition.

6. Attachments 2 through 6 depict maps of the general location of the four component facilities (*i.e.*, the Bottineau Equipment, Wahpeton Equipment, and Rugby Equipment substation sites and a diagram of the Rolette Line Segment, along with a map of North Dakota with approximate locations for the four components) that make up the Purchased Assets subject to the Proposed Acquisition,⁶ as follows:

Attachment 2: North Dakota map with general locations of the Purchased Assets

Attachment 3: Bottineau Equipment facilities map

Attachment 4: Wahpeton Equipment facilities map

Attachment 5: Rugby Equipment facilities map

Attachment 6: Rolette Line Segment facilities map

7. Applicant seeks authorization to acquire the Purchased Assets on the terms and conditions contained in the Asset Purchase Agreement. The Company is not extending retail service to any new electric customers in connection with the Proposed Acquisition.

8. The Proposed Acquisition will provide operational efficiencies and financial benefits in support of North Dakota customers. The broader financial and operational benefits of the Proposed Acquisition are detailed above. As to the specific configuration and location of the Purchased Assets: (a) at Wahpeton, the facilities proposed for purchase from CPEC directly serve over 900 Otter Tail customers; (b) at Bottineau, the CPEC facilities directly serve over 1,100 Otter Tail customers; (c) at Rugby, the CPEC facilities proposed for purchase are integrated with the high voltage transmission system and indirectly support a multitude of Otter Tail customers in the region; and (d) in the case of Rolette, the 69 kV Rolette Line Segment currently owned by CPEC directly serves over 1,400 Otter Tail customers. The integration of the Purchased Assets into Otter Tail's system will provide the

⁶ More specific descriptions including one-line electrical diagrams of the Purchased Assets are included in the Purchase Agreement (Attachment 1).

most direct benefit to these North Dakota customers in close proximity to these facilities, as well as a broader set of North Dakota customers served by the Otter Tail system.

9. Applicant is an experienced and vertically integrated electric generation, transmission and distribution utility with the expertise and resources to own, operate and maintain the facilities that are the subject of the Proposed Acquisition as part of its electrical system serving the public. Indeed, the Proposed Acquisition addresses four important transmission substation and line facilities where CPEC and Otter Tail both already have operational experience and obligations today. The Proposed Acquisition encompasses facilities where reorganization of ownership between CPEC and Otter Tail can provide operational benefits and efficiencies for both utilities.

10. There will be no change to the Applicant's retail electric service area. Otter Tail's retail electric customers will continue to be served by Applicant under applicable tariffs, rules, and regulations on file with the Commission. The Proposed Acquisition is a reorganization of existing ownership, operational, and maintenance responsibilities concerning the Purchased Assets.

11. Pursuant to N.D.C.C. § 49-22-24, any necessary modifications to the Purchased Assets by Otter Tail once acquired shall be constructed to comply with the standards of the National Electrical Safety Code.

12. As noted above, the Purchased Assets would be purchased from a generation and transmission electric cooperative and thus would be newly owned by Otter Tail as an addition to its existing system in North Dakota. To assist the Commission with its determinations of the Proposed Acquisition, Applicant notes that the Purchased Assets are transmission-related assets, are not related to direct retail service, and will not extend the

Company's retail electric service. The Proposed Acquisition will not provide or impact direct retail service or otherwise be in competition with any other retail electric suppliers in the area.

13. Applicant believes it is in the public interest that Applicant be granted a CPCN for the authority it requests herein, and that public convenience and necessity is served by such acquisition and operation. Pursuant to N.D.C.C. § 49-03-02(2), Otter Tail requests the Commission grant the requested Application not more than 20 days after a notice of opportunity for hearing is issued in this proceeding, if no party requests a hearing.

14. Supporting Documents:

As described in more detail above, the following attachments are enclosed with this Application as required by N.D.C.C. § 49-03-01, *et seq.*


<u>Attachment</u>	<u>Description</u>
1	Executed Asset Purchase Agreement between Otter Tail and CPEC
2-6	Maps of the approximate locations of the facilities (the Purchased Assets) encompassed within the Proposed Acquisition: <i><u>Attachment 2:</u> North Dakota maps of approximate locations</i> <i><u>Attachment 3:</u> Map for Bottineau Equipment facilities</i> <i><u>Attachment 4:</u> Map for Wahpeton Equipment facilities</i> <i><u>Attachment 5:</u> Map for Rugby Equipment facilities</i> <i><u>Attachment 6:</u> Map for Rolette Line Segment facilities</i>
7	CPEC Board of Directors' Resolution #2019-17, authorizing CPEC's execution of necessary agreements with Otter Tail pursuant to its authorizing the sale of the Purchased Assets
8	CPEC Bill of Sale, listing the Purchased Assets original cost, accumulated depreciation and net book value estimated as of Dec. 31, 2019.

WHEREFORE, Applicant respectfully requests that the Commission:

1. Enter an Order and issue a Certificate of Public Convenience and Necessity authorizing the Applicant to acquire, own, operate and maintain the Purchased Assets and approve the Proposed Acquisition, as described herein; and
2. Grant such other relief as the Commission shall deem appropriate.

Dated: 8-20-19

OTTER TAIL POWER COMPANY

By: 
Cary Stephenson
Associate General Counsel
Otter Tail Corporation

