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July 23, 2020

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

**RE: Otter Tail Power Company Meter Readings Waiver – COVID-19
Case No. PU-20-159
Estimated Meter Reading Update and Request for Limited Estimating**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail) submits this estimated meter reading update and request for limited estimating to continue in the above referenced matter.

On March 26, 2020, Otter Tail filed a request for authorization to temporarily use estimated meter readings in certain meter locations to prevent and contain the spread of COVID-19. Otter Tail's request to suspend meter readings at locations where the electric meter is located inside an inhabited structure, and authorize estimated meter reads for those locations was approved by the North Dakota Public Service Commission (Commission) on April 15, 2020. On May 14, 2020, a Motion was issued by the Commission approving Otter Tail's request to extend, from May 31, 2020 to July 31, 2020, the suspension of meter readings as described in this case.

Otter Tail appreciates the Commission working with utilities as we maneuver through this challenging and uncertain time and we want to take this opportunity to provide an update on circumstances surrounding estimating meter readings in our locations where a meter is located inside an inhabited structure.

To date we have received little customer feedback and we believe customers generally understand the reasoning for not entering customer facilities to secure readings. When customers have called with concerns, staff work with the customer on what options may be available including securing a reading from the customer. We have worked on different ways for

customers to submit readings so we can generate a bill based on actual readings. We have completed the work for customers to be able to submit pictures of meter readings to Otter Tail office staff, to submit their meter readings through our website, or to call and submit meter readings. Letters were sent on June 25, 2020, notifying customers with meters inside living quarters informing them of this added option to submit meter readings. The notice encourages customers to submit readings this way and Otter Tail will continue to work with those customers where this process is not an option. We recognize that not all customers will submit readings so some limited estimation may continue to be necessary. Along with our self-read accounts, customers have been submitting readings via our website and some have been emailing a picture of the meter. When we introduce new options for customers, there are typically some issues that need to be worked through. One example is pictures of meters have at times come in and the image is unclear or blurry. When this occurs, we reach back out to the customer and work with them to submit another picture or secure the reading over the phone.

This process will reduce the number of meters estimated each month, but likely some estimating may be necessary beyond July 31, 2020. From our current evaluation, we anticipate estimation may be necessary through September 30, 2020 in the instances where we cannot coordinate securing a reading with the customer. Otter Tail will re-evaluate if continued estimation is necessary beyond that date.

An electronic copy of this filing is being sent to ndpsc@nd.gov. If you have any questions regarding this filing, please contact me at 218-739-8657 or at molsen@otpc.com.

Sincerely,

/s/ MATTHEW J. OLSEN

Matthew J. Olsen

Manager, Regulatory Proceedings and Compliance

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By electronic filing and U.S. mail