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August 13, 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
Supplementary Information**

In response to the ND Public Service Commission's verbal comments at the August 5, 2020 Commission meeting and a request by Commission Staff, Otter Tail Power Company submits this supplementary information in the above referenced Case.

In North Dakota, Otter Tail Power Company (Otter Tail) serves approximately 46,650 residential customers, including farms where there is also residential usage. Otter Tail serves approximately 11,670 small business customers in North Dakota.

In our initial filing in this matter, Otter Tail originally estimated that less than 2 percent of customers had meters located inside their homes. In the course of billing over the last several months during this pandemic, actual estimating has been substantially less than that estimate. Over the four-month period from April to July, Otter Tail issued a cumulative total of 475 bills with estimated usage, an average of 119 per month, or 0.25 percent of the residential customers we serve in North Dakota.

To reduce the likelihood that estimated bills over a long duration would result in substantial true-up balances when an actual read is procured, in June Otter Tail notified customers whose meters may have been estimated of options to submit an actual reading. The options for customers include calling our customer service representatives for instructions on how to read their meter, taking a picture of their meter and submitting it to Otter Tail by email, or submitting the reading for their account online. While we don't have a way to capture which method customers utilize, we know some customers are submitting readings which are entered manually into our system. Over the four months of April to July, 170 accounts with 210 readings were manually entered. We anticipate this number will increase over time as we are better able to communicate the options for customers to submit these readings.

As we consider the information about the pandemic and its impacts on our operations, we foresee that some amount of estimating will be necessary for the foreseeable future. This is necessary for the health and safety of our customers and employees by avoiding close, indoor interactions. While supplying their meter reading is not typical for most of our customers, as the Commission noted, there are still self-read customers within our service territory. Expanding this process to these customers who have meters located inside their homes will be the best means of partnering with these customers for everyone's safety. We will continue our efforts to expand the number of customers utilizing options to provide their readings. We will continue to contact these customers by phone or mail. If a reading can be provided periodically, it will minimize the potential for any necessary true-up.

Understanding that this pandemic could continue for many more months, if we do not receive an actual reading from a customer and the estimation results in a substantial true-up balance once a reading is procured, we will work with those customers to make appropriate payment plans. This may involve a payment plan spanning several months or up to one year, as is used for our Even Monthly Payment plans.

We appreciate the Commission's support for the steps we are taking to minimize the potential for exposure or spread of a virus within our service territory. The pandemic has certainly impacted the way our business operates and how we each live daily. At the same time, if there are relatively minor adjustments we can make to protect our neighbors, those actions are very meaningful.

We will continue to keep the Commission apprised of our approach and efforts to minimize disruptions or impacts to our customers. Please let me know if you have additional questions. You can contact me at 218-739-8657 or at molsen@otpc.com.

An electronic copy of this filing is being sent to ndpsc@nd.gov. An original and seven copies are being sent by U.S. mail.

Sincerely,

/s/MATTHEW J. OLSEN

Matthew J. Olsen
Manager, Regulatory Proceedings and Compliance

cjh
Enclosures
By electronic filing and U.S. mail