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September 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  
Update and Extension Request**

Dear Mr. Kahl:

On March 26, 2020, Otter Tail Power Company (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. On April 15, 2020, Otter Tail's request to temporarily 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). The period as approved, was through May 31, 2020. On May 14, 2020, the Commission approved Otter Tail's May 5, 2020 request to extend the period to July 31, 2020 and on August 6, 2020, the Commission approved Otter Tail's July 23, 2020 request for an extension of this period to September 30, 2020.

Otter Tail continues to monitor the guidance for social distancing and North Dakota's efforts to contain and mitigate the spread of this virus. Otter Tail recognizes the need to continue to reduce personal interactions between customers and field staff. Therefore, Otter Tail wants to take this opportunity to provide an update on circumstances surrounding estimating meter readings and respectfully request the Commission grant an additional extension to the current approved date of September 30, 2020 to the end of the year, December 31, 2020.

Currently, Otter Tail continues to receive very little customer feedback for not entering customer facilities to secure readings. When customers have called with concerns, we continue to work with the customer on what options may be available including securing a reading from the customer. We have different options for customers to submit readings so we can generate a bill based on actual readings. Customers can call our customer service number to submit a reading over the phone, submit a reading from our website and a couple of months ago, we implemented a process to allow customers to take a picture of their meter(s) and email the picture with the reading to Otter Tail staff. For customer situations where meters are in living quarters, we continue to encourage customers to use one of the three options that works best for them. The number of estimated readings continues to be very low and with those situations we continue to work with the customers affected.

Otter Tail will continue to monitor this estimated meter reading process. If further extensions are necessary, Otter Tail will submit such requests. Please let me know if you have additional questions. You can contact me at 218-739-8657 or at [molsen@otpc.com](mailto:molsen@otpc.com).

An electronic copy of this filing is being sent to [ndpsc@nd.gov](mailto:ndpsc@nd.gov). An original and seven copies are being sent by U.S. mail. If you have any questions regarding this filing, please contact me at 218-739-8657 or at [molsen@otpc.com](mailto:molsen@otpc.com).

Sincerely,

*/s/MATTHEW J. OLSEN*  
Matthew J. Olsen  
Manager, Regulatory Proceedings and Compliance

cjh  
By electronic filing and U.S. mail