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December 9, 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
Docket 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) 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; on August 6, 2020, the Commission approved Otter Tail's July 23, 2020 request for an extension of this period to September 30, 2020 and on October 7, 2020 the Commission approved Otter Tail's September 23, 2020 request to extend the period to December 31, 2020.

Otter Tail has monitored the guidance for social distancing and North Dakota's efforts to contain and mitigate the spread of this virus since the onset of this pandemic. Otter Tail recognizes the need to continue to reduce personal interactions between customers and field staff. Otter Tail wants to take this opportunity to continue to provide updates on circumstances surrounding estimating meter readings and respectfully requests the Commission grant an additional extension to the current approved date of December 31, 2020 to March 31, 2021.

Currently, Otter Tail continues to receive very little customer feedback for not entering customer facilities to secure readings. When customers call with concerns or questions about estimated readings, Customer Service Representatives work with the customer on what options may be available including securing a reading from the customer. As we've previously reported, customers can call our customer service number to submit a reading over the phone, submit a reading from our website or take a picture of their meter(s) and email the picture with the reading to Otter Tail staff. For customer situations where there are three or more consecutive months of estimated readings, 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 we continue to work with the customers affected. Monthly we run a report that shows the number of customers with three or more consecutive months of estimated readings and we attempt to contact the customer to secure and submit a reading. As of the end of November, there are four residential customers with three or more consecutive months of estimated readings. Of these four customers, all four were estimated for the third consecutive month, three were estimated for both the fourth and fifth consecutive months, and one is at the sixth consecutive month of estimated billing. For the customers we are unable to reach, we will continue to estimate readings until such time we receive an actual reading from the customer by one of the methods described above.

Otter Tail will continue to submit these periodic updates and monitor this situation for further extension requests as necessary according to guidance for social distancing.

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. 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

cjh

By electronic filing and U.S. mail