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October 6, 2026

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

**RE: In the Matter of Otter Tail Power Company's Submittal of its
2022–2036 Integrated Resource Plan
Case No. PU-21-380
Extension Request**

Dear Mr. Johnson:

Otter Tail Power Company (Otter Tail Power or Company) respectfully requests that the North Dakota Public Service Commission (Commission) grant a one-year variance from the Company's current integrated resource plan filing date and amend Ordering Point 3 of the Commission's December 4, 2024 Order and Guidance on Integrated Resource Plan.¹ Specifically, Otter Tail Power requests that the filing date for its next North Dakota integrated resource plan be extended from May 15, 2027, to May 15, 2028. This request is made pursuant to N.D. Admin. Code § 69-09-12-02(5), which permits the Commission to grant a variance from a resource-plan filing requirement or procedure upon request.

Otter Tail Power anticipates filing multiple applications for Advance Determination of Prudence (ADP) concerning new resource additions over the next several months. The Commission's decisions in those ADP proceedings will materially inform the resource portfolio, assumptions, and alternatives evaluated in the Company's next integrated resource plan. Extending the filing date to May 2028 would allow the Company to incorporate the Commission's guidance on those resources and present a more current, meaningful, and internally consistent planning record.

The requested extension would also promote regulatory and administrative efficiency. Proceeding simultaneously with multiple resource-specific ADP proceedings and a comprehensive integrated resource plan would create substantial overlap in modeling, discovery, testimony, and stakeholder review. A one-year extension would reduce that duplication and allow the Commission, Commission Staff, interested stakeholders, and Otter Tail Power to focus on the pending resource-specific ADP proceedings and then evaluate those resources collectively in the subsequent integrated resource plan.

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Otter Tail Power Company
Nathan Jensen, Mgr. Resource Planning

¹ [Order and Guidance on Integrated Resource Plan, December 4, 2024: 032-010.pdf](#)

The requested variance is limited to one year and would not reduce the Commission's oversight of the Company's resource decisions. Rather, it would sequence the proceedings so that the May 2028 integrated resource plan can reflect the Commission's decisions on the proposed resource additions and provide a better-informed assessment of the Company's long-term resource strategy.

For these reasons, Otter Tail Power respectfully requests that the Commission grant a variance from the current filing schedule and amend Ordering Point 3 of its December 4, 2024 order to require the Company to file its next North Dakota integrated resource plan no later than May 15, 2028.

Copies have been sent to you via USPS.

We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at njensen@otpc.com or (218) 739-8989.

Sincerely,

/s/ *NATHAN JENSEN*
Nathan Jensen
Manager, Resource Planning

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Enclosures
By electronic filing and U.S. mail