

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)



May 24, 2022

Steve Kahl
Executive Secretary
North Dakota Public Service Commission
600 East Boulevard, Dept 408
Bismarck, ND 58505-0480

**RE: In the Matter of the Public Service Commission Resource Plans and
Cyber Security Rulemaking
Case No. PU-22-163
Comments**

Dear Mr. Kahl:

Thank you for the opportunity to comment on the rules proposed in Case No. PU-22-163. Commission staff involved us early in the process and we have previously provided written and verbal feedback. We support the rules as drafted and look forward to participating in the new Integrated Resource Planning process.

Our current resource plan was filed September 1, 2021.¹ This will confirm our understanding that the current resource plan will not be subject to the proposed rules. As a multi-jurisdictional utility, our company plans its resources on a system-wide basis serving 130,000 customers across North Dakota, South Dakota, and Minnesota. Our resource planning decisions consider requirements from all jurisdictions and work to put forth one system-wide resource plan which benefits all customers through numerous efficiencies and economies of scale.

By considering a variety of scenarios, our company's goal has always been to focus on least-cost resource planning, but to also consider qualitative risks inherent in any plan under the broadest range of possible futures. Therefore, it may be more accurate to say that we have focused on finding the "least-cost / least-risk" plan.

The proposed rules will require coordination with the Commission and staff to ensure a level of detail and analysis desired by the Commission in order to fulfill these new requirements.

¹ Otter Tail's September 1, 2021, filing *In the Matter of Otter Tail Power Company's Submittal of its 2022-2036 Integrated Resource Plan* in Case No. PU-21-380.

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Please feel free to please contact me at njensen@otpc.com or (218) 739-8989 should you have any questions related to this letter.

Respectfully,

/s/ NATHAN JENSEN
Nathan Jensen
Manager, Resource Planning

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Enclosures
By electronic filing