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January 23, 2023

Mr. Steve Kahl
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 Ottertail Power Company's Application for Modifications
To its Energy Adjustment Rider
Case No. PU-23-
Initial Filing**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail) hereby submits to the North Dakota Public Service Commission (Commission) its initial filing in the above-referenced matter. Proposals in this filing are conditioned on Commission approval of proposals advanced in Otter Tail's recent annual update to the Renewable Resource Adjustment Rider (RRAR) submitted December 30, 2022, Case No. PU-22-429.

An original and copies have been sent to you via USPS along with a \$50.00 check for the filing fee.

Please contact me at (218) 739-8279 or STommerdahl@otpc.com if you have any questions regarding this filing.

Sincerely,

/S/ STUART TOMMERDAHL
Stuart Tommerdahl
Manager, Regulatory Economics
Regulatory Administration

vjm
Enclosures
By electronic filing and U.S. mail

**STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION**

**In the Matter of Otter Tail Power
Company's Application for Modifications
To its Energy Adjustment Rider**

**Case No. PU-23-

APPLICATION**

I. SUMMARY

Otter Tail Power Company (Otter Tail) submits this Application to the North Dakota Public Service Commission (Commission) for approval of:

1. An update to its Energy Adjustment Rider (EAR), Tariff Section 13.01 to include Mid-Continent Independent System Operator (MISO) Planning Resource Auction (PRA) revenues and expenses in the calculation of monthly EAR or Fuel Clause Adjustment (FCA) rates.
2. This request is part of a proposal advanced in Otter Tail's recent annual update to the Renewable Resource Adjustment Rider (RRAR) submitted December 30, 2022, Case No. PU-22-429, to help offset the impacts of Otter Tail's proposal to update jurisdictional allocation factors in the RRAR.¹
3. Otter Tail realized approximately \$9.34 million (System) of revenue from the sale of excess generation capacity in the 2022/2023 MISO Planning Resource Auction (PR Auction or PRA) covering the June 2022 to May 2023 timeframe.
4. The North Dakota share of the MISO PRA revenues is estimated to be over \$4 million based on the estimated E2 factor for North Dakota for 2023. Actual benefit will be determined when revenues are incorporated into monthly EAR calculations.

¹ Renewable Resource Adjustment Rider (RRAR) submitted December 30, 2022, Case No. PU-22-429, Page 8.

5. Otter Tail's proposed changes to EAR Tariff Section 13.01 have been coordinated with and is contingent on gaining Commission approval of its proposed allocation factor changes in the RRAR, without which the changes proposed in this case could drive significant earnings deficiencies.
6. In addition to the changes proposed above, Otter Tail also includes some minor tariff administrative corrections/changes to Section 13.01 in this filing.

II. INTRODUCTION

Otter Tail submits this Application to the Commission for approval of an update to its EAR, Tariff Section 13.01 to include MISO PR Auction revenue and expenses in the calculation of monthly EAR rates. This proposed change would be effective April 1, 2023 and include all known revenues that Otter Tail will receive during the MISO 2022/2023 planning year. Otter Tail will receive \$9.34 million (System) in PRA revenues, of which Otter Tail estimates over \$4 million will benefit North Dakota ratepayers through reduced EAR rates. Otter Tail is advancing this proposed change to its EAR contingent on Commission approval of its proposal advanced in Otter Tail's recent annual update to the RRAR submitted December 30, 2022, Case No. PU-22-429.

In addition to the changes above, Otter Tail is proposing some minor administrative corrections/changes to the Section 13.01 tariff sheet in this filing. These changes are described later in this filing.

III. GENERAL FILING INFORMATION

Pursuant to § 69-02-02-04 of the Commission's Rules of Practice and Procedure, the following information is provided:

A. Name, address, and telephone number of the utility making the filing

Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8200

B. Name, address, and telephone number of utility attorney

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8956

C. Title of utility employee responsible for filing

Stuart Tommerdahl
Manager, Regulatory Economics
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
(218) 739-8279

We request that all communications regarding this proceeding, including data request, also be directed to:

Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
regulatory_filing_coordinators@otpc.com

D. The date of filing and the date changes will take effect

The date of this filing is January 20, 2023. Otter Tail proposes an effective date of April 1, 2023, for inclusion of known and realized MISO PRA revenues and expenses and increasing asset-based sales margins included in the EAR from 85% to 100%.

E. Other requirements of North Dakota Rules Part 69-02-02-04

Pursuant to [N.D. Admin. Code § 69-02-02-04](#), a certified copy of Otter Tail's articles of incorporation and a current certificate of good standing are on file with the Commission in Case No. PU-09-677. The certificate and amendments are hereby incorporated by reference.

F. Customer Notification

No notice is required for this update to Tariff Section 13.01 as no initial rate increase is contemplated as a result of the requested changes in this filing.

IV. DESCRIPTION AND PURPOSE OF FILING

A. Energy Adjustment Rider Background

The EAR rate is calculated and implemented each month to reflect the change in fuel and purchased power costs, as stated in Section 13.01 of Otter Tail's Electric Rate Schedule. According to Section 13.01, the monthly EAR rate is computed on a *system basis* including those costs the Commission has deemed eligible for EAR recovery based on a trailing four-month average.

One component of the EAR rate calculation is the inclusion of 85 percent of any asset-based sale margins in the EAR as discussed in Section 13.01. Otter Tail currently retains 15 percent of those margins. For 2022, Otter Tail's 15 percent share of the North Dakota allocation of asset-based margins was approximately \$336k. Otter Tail forecasts a similar amount of margin for 2023, but notes that asset-based sales and margins vary from year to year as a result of numerous factors including retail load levels, MISO market prices, operating costs of the plants, as well as plant availability.

Costs associated with the purchase of generation capacity, or revenues from the sale of generation capacity, have historically been excluded from the EAR. This includes bilateral transactions as well as the results of capacity purchases or sales within the MISO resource adequacy construct. If any purchases occurred, they were accounted for as a normal operating expense. If sales occurred, the revenues would be accounted for as Other Electric revenue. Essentially, capacity transactions were managed between rate cases as part of normal business operations and base rate recovery.

B. Planning Resource Auction

The Planning Resource Auction is a voluntary annual capacity auction that provides a way for MISO Market Participants to meet resource adequacy requirements. The location-specific approach of the PRA encourages resources to be available when needed in the right locations in an economic and efficient manner. Market Participants with excess capacity can offer that capacity to be sold into the market over the next planning year. Market Participants who need additional capacity are afforded the opportunity to procure that capacity from the market. MISO administers the auction and determines the value of the capacity sellers will receive and buyers will pay.

In 2022, Otter Tail participated in MISO's annual PR Auction and offered excess capacity for the 2022/2023 planning year² into that auction. MISO published the results of the PRA in the spring of 2022 which resulted in a significant increase in the value of capacity. As a result, Otter Tail's excess capacity yielded approximately \$9.34 million (System) of revenue for the 2022/2023 planning year. Attachment 1 to this filing provides a summary of Otter Tail's PRA revenues.

C. Future Planning Resource Auctions and Changes in Seasonal Construct

As a MISO market participant, Otter Tail will continue to participate in the annual PR Auction. Recent changes in the MISO resource adequacy seasonal construct will now require market participants to maintain seasonal capacity levels that will vary from season to season. This is a change from the single annual peak construct that MISO previously used for determining resource adequacy of its market participants. Beginning with the MISO 2023/2024 planning year, MISO will begin holding seasonal auctions.

Otter Tail continues to monitor and evaluate the potential impact of MISO's seasonal construct. It is possible at some point in time in the future, Otter Tail may have excess capacity in some seasons to sell, and perhaps need to acquire capacity (an expense), in other seasons.

D. Renewable Rider Proposal to Update Jurisdictional Allocation Factors

On December 30, 2022, Otter Tail filed its annual update to its Renewable Resource Adjustment Rider (RRAR), Case No. PU-22-429. In that filing, Otter Tail proposed the following on page 8:

Effective January 1, 2018, the North Dakota share of the revenue requirement was based on the North Dakota E2 allocation factor of 37.577 percent as Ordered in Case No. PU-17-398. Historically, rider jurisdictional allocation factors have not changed between rate cases, in large part due to them remaining relatively stable year over year across all our jurisdictions. In 2022, Otter Tail realized a more material shift in the E2 factor

² The 2022/2023 MISO planning year runs from June 1, 2022, to May 31, 2023.

from load changes across our jurisdictions, including load additions in North Dakota. Otter Tail strives to seek “right recovery” across all jurisdictions and when material load shifts occur, usually the shifts in cost allocations don’t get adjusted until the next rate case. Keeping rates low by avoiding rate cases yet seeking appropriate recovery and balancing appropriate earnings levels across our jurisdictions continues to be our goal.

In this filing, Otter Tail proposes a change in the 2022 North Dakota E2 allocation factor to 41.783 percent and a change in the 2023 North Dakota E2 allocation factor to 43.489 percent. These changes are reflective of the current and forecasted usage of Otter Tail’s North Dakota customers. Otter Tail proposes that these forecasted factors could be true-ed up to actual amounts in future filings. The estimated impact of the change in the E2 allocator for both 2022 and 2023 over the recovery period is approximately \$4.4 million.

As explained in the excerpt from Otter Tail’s RRAR filing above, Otter Tail desires to adjust its jurisdictional cost allocation factor in that rider, that normally remains unchanged between rate cases, to more appropriately reflect jurisdictional impacts of material changes in load. While there is an increase in cost allocation because of new load added in North Dakota, that new load reduces the actual rate impact because the revenue requirement is spread over an increased level of sales and base revenues (because of the new load) that the RRAR percent of bill rate is developed and applied to. Absent the change in allocation factor, the revenue requirement would still be spread over an increased level of sales and the corresponding rate would be artificially low. In other words, from a rate perspective, the increase in revenue requirement from adjusting the allocation factor is neutralized by the increased volume of sales upon which that revenue requirement is spread, thereby helping mitigate the actual change in the rate and impact to other ratepayers.

E. Proposal to Modify EAR Reduces Ratepayer EAR Costs

In this filing, Otter Tail is proposing a change to the EAR to include known MISO PRA revenues or expenses in the calculation of monthly EAR rates, which includes crediting the MISO 2022/2023 planning year PRA revenues Otter Tail is receiving. As discussed earlier, this proposal would provide an estimated \$4

million or more reduction in EAR costs to North Dakota rate payers. This proposal is conditioned on the Commission's acceptance of our proposed changes to the jurisdictional allocator in its RRAR update filing. Otter Tail believes the inclusion of these revenues will help address the near-term impact of its proposed changes to the jurisdictional allocation factor in the RRAR that addresses an appropriate shift in the allocation of costs across our jurisdictions due to material load changes and which are somewhat neutralized to the extent the higher sales volumes are included in setting the RRAR rate.

Upon approval of the proposed change in the RRAR and accepting Otter Tail's recommendations related to the modifications to the EAR, Otter Tail will incorporate the cumulative 2022/2023 planning year PR Auction revenues received to date into the next applicable monthly EAR calculation. If April 1, 2023 becomes the effective date of the proposed change, all revenues received up to March 31, 2023 would be included in the EAR calculations that would set the May 1, 2023 rates. Subsequently received revenues would be incorporated into their respective accounting months for the remainder of the MISO Planning year. As noted earlier, Otter Tail estimates that over \$4 million of benefit³ will be returned to rate payers through the EAR rate impact of the PRA revenues. Results from subsequent MISO PR Auctions for capacity would continue to be included in monthly EAR rate calculations as revenues are received or expenses are incurred.

V. Section 13.01 Tariff Changes

A. Proposal Changes

Attachment 2 to this filing includes both Non-Legislative and Legislative versions of the proposed changes to Otter Tail's Rate Schedule Section 13.01, Energy Adjustment Rider by Service Category.

Language has been added on page 2 to reflect the inclusion of MISO PRA Revenues and Expenses when determining the average cost of Energy. Due to the limited space available on this page, text from page 2 was relocated to page 3.

³ Because the monthly EAR rates are calculated on a system basis, the full \$9.34 million of PR Auction revenue will be factored into the rate calculations over time, and then those rates will be applied to North Dakota EAR eligible kWh sales, which will effectively return the estimate \$4+ million benefit to ratepayers through the EAR.

B. Administrative Updates

Additionally, we are taking this opportunity to make administrative corrections that have been identified in the Energy Adjustment Factor (EAF) table on page 1.

1. In the “Service Category” column, we have made minor administrative changes.
2. In the “Section” column, 9.04 (Residential Time of Day Pilot) has been deleted. This tariff and rate were eliminated in December of 2021 in Case No. PU-21-439.
3. In the “Section” column, 11.01 (Standby Service) has been moved from Irrigation Service to the Large General Service. Large General Service is the appropriate Service Category for Standby Service.

VI. CONCLUSION

Otter Tail believe the proposals offered in its annual update to the RRAR and in this application, balance rate impacts to ratepayers while allowing Otter Tail to adjust recovery of costs to reflect current operations more accurately while meeting its revenue requirement needs. As such, in this Case, Otter Tail requests the Commission approve:

1. Otter Tail’s recommended modifications to the EAR for inclusion of PRA revenues and expenses for the 2022/2023 MISO planning year and for all years going forward.
2. Approve the effective date of these changes to be April 1, 2023.

These recommendations are contingent on the Commission’s approval of its proposed allocation factor change in its annual update to the RRAR. Otter Tail also requests approval of the administrative updates to Tariff Section 13.01 as described in this filing.

Date: January 23, 2023

Respectfully submitted:

OTTER TAIL POWER COMPANY

By: /s/ STUART D. TOMMERDAHL

Stuart D. Tommerdahl
Manager, Regulatory Economics
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8279

Attachments

Attachment 1	Summary of 2022/2023 Planning Resource Auction Revenues
Attachment 2	Section 13.01 Energy Adjustment Rider (Non-Legislative and Legislative versions)

Otter Tail Power Company
2022 - 2023 Planning Year Planning Reserve Auction Results

Month	Year	Total Net Revenue
June	2022	\$ 767,551
July	2022	\$ 793,136
August	2022	\$ 793,136
September	2022	\$ 767,551
October	2022	\$ 793,136
November	2022	\$ 767,551
December	2022	\$ 793,136
January	2023	\$ 793,136
February	2023	\$ 716,381
March	2023	\$ 793,136
April	2023	\$ 767,551
May	2023	\$ 793,136
Total		<u>\$ 9,338,532</u>
2022 Total		\$ 5,475,194
2023 Total		\$ 3,863,338
Total Planning Year		<u>\$ 9,338,532</u>
ND Share 2022 Est	45%	\$ 2,463,837
ND Share 2023 Est	45%	\$ 1,738,502
		<u>\$ 4,202,340</u>

Attachment 2
Non-Legislative and Legislative Versions of Tariff
Sheet ND 13.01 – Energy Adjustment Rider



ENERGY ADJUSTMENT RIDER BY SERVICE CATEGORY

ENERGY ADJUSTMENT CHARGE: There shall be added to the monthly bill an Energy Adjustment Charge calculated by multiplying the customers applicable monthly billing kilowatt hours (kWh) by the customers applicable billed Energy Adjustment Factor (EAF) per kWh. The billed EAF amount per kilowatt-hour (rounded to the nearest 0.001¢) will be the average monthly cost of Energy per kilowatt-hour as determined for that customers service category. The average cost of Energy per kilowatt-hour for the current period shall be calculated from data covering actual costs from the most recent four-month period as follows:

Energy costs from actual months 1, 2, 3, and 4 plus unrecovered (or less over recovered) prior cumulative Energy costs divided by retail sales for actual months 1, 2, 3, and 4 equals the cost of Energy adjustment for month 6.

ENERGY ADJUSTMENT FACTOR (EAF): A separate EAF will be determined for each Customer service category defined by Customer class. The EAF for each service category is the sum of the Current Period Average Cost of Energy and applicable monthly true-up, multiplied by the applicable EAF Ratio. The applicable EAF for each calendar month will be applied to that calendar month’s daily pro-ration of Energy usage included on the bill.

Service Category	Section	EAF Ratio
Residential	9.01, 9.02, 9.04	1.025
Farms	9.03	0.969
General Service	10.01, 10.02, 10.03	1.016
Large General Service	10.04, 10.05, 10.06, <u>11.01</u>	0.967
Irrigation Services	11.01 , 11.02	0.937
Outdoor Lighting	11.03, 11.04, 11.07	0.784
OPA	11.05	1.011
Controlled Service - Water Heating	14.01	1.035
Controlled Service - Interruptible	14.04, 14.05, 14.12	1.037
Controlled Service - Deferred	14.06, 14.07	0.963

The average cost of Energy shall be determined as follows:

1. The cost of fossil fuel, as recorded in Account 151, used in the Company's generating plants, and the costs of reagents and emission allowances for the Company to operate its generating plants in compliance with the associated Federal Environmental



Fergus Falls, Minnesota

Protection Agency rules and regulations. Energy from the Company's hydro generating plants shall be included at zero cost.

2. The Energy cost of purchased power included in Account 555 when such Energy is purchased on an economic dispatch basis, exclusive of Capacity or Demand charges. This includes but is not limited to net costs linked to the utility's load serving obligation, associated with participation in wholesale electric Energy markets operated by Regional Transmission Organizations, Independent System Operators or similar entities that have received Federal Energy Regulatory Commission approval to operate the Energy markets. All Midwest Independent System Operator ("MISO") Energy and Ancillary service market charges and credits relating to retail sales and asset based sales, specifically including (but not limited to) Schedule 16 and 17 charges and credits shall be included in the calculation.
3. The actual identifiable fossil and nuclear fuel costs associated with Energy purchased for reasons other than identified in 2 above.
4. The net Energy cost of Energy purchases from a renewable Energy source, including hydropower, wood, windpower, and biomass.
5. Less the fuel-related costs recovered through intersystem sales.
6. The Energy cost of avoided purchased power resulting from Hoot Lake Solar output.
7. Known MISO Planning Resource Auction capacity costs will be added to the energy adjustment rider or revenues will be credited (flow through) the energy adjustment rider.

Asset-based Sales Margins, as defined below and in the amount calculated as described below, shall be reflected as a credit to the Energy adjustment calculation described in 1-6, above.

Asset-based Sales Margins:

Asset-based Sales Margins are defined as wholesale Energy and ancillary services sales revenues from Company-owned generation resources less the sum of fuel, Energy costs (including costs associated with MISO markets that are recorded in FERC Account 555), and any additional transmission or other costs incurred that are required to make such sales (referred to as "margins").



Fergus Falls, Minnesota

The amount of the Asset-based Sales Margin credit shall be determined as described below:

Credit calculation: The credit shall be eighty-five percent (85%) of Asset-based Sales Margins. The Asset-based Sales Margin credit shall be calculated monthly based on a forecast of the margins expected for that month and a true-up shall be made to adjust prior forecasted credits to reflect eighty-five percent (85%) of the actual margins earned in prior months. The true-up adjustments shall be made as soon as reasonably practical after the receipt of actual results and shall reflect MISO and other resettlements that would have impacted prior credits.

NORTH DAKOTA PUBLIC
SERVICE COMMISSION
Case No. PU-~~23-17-398~~
Approved by order dated ~~September 26, 2018~~

EFFECTIVE with bills rendered on
and after ~~February 1, 2019~~, in North Dakota
APPROVED: Bruce G. Gerhardson
Vice President, Regulatory Affairs



Fergus Falls, Minnesota

ENERGY ADJUSTMENT RIDER BY SERVICE CATEGORY

ENERGY ADJUSTMENT CHARGE: There shall be added to the monthly bill an Energy Adjustment Charge calculated by multiplying the customers applicable monthly billing kilowatt hours (kWh) by the customers applicable billed Energy Adjustment Factor (EAF) per kWh. The billed EAF amount per kilowatt-hour (rounded to the nearest 0.001¢) will be the average monthly cost of Energy per kilowatt-hour as determined for that customers service category. The average cost of Energy per kilowatt-hour for the current period shall be calculated from data covering actual costs from the most recent four-month period as follows:

Energy costs from actual months 1, 2, 3, and 4 plus unrecovered (or less over recovered) prior cumulative Energy costs divided by retail sales for actual months 1, 2, 3, and 4 equals the cost of Energy adjustment for month 6.

ENERGY ADJUSTMENT FACTOR (EAF): A separate EAF will be determined for each Customer service category defined by Customer class. The EAF for each service category is the sum of the Current Period Average Cost of Energy and applicable monthly true-up, multiplied by the applicable EAF Ratio. The applicable EAF for each calendar month will be applied to that calendar month's daily pro-ration of Energy usage included on the bill.

Service Category	Section	EAF Ratio
Residential	9.01, 9.02,	1.025
Farm	9.03	0.969
General Service	10.01, 10.02, 10.03	1.016
Large General Service	10.04, 10.05, 10.06, 11.01	0.967
Irrigation Service	11.02	0.937
Outdoor Lighting	11.03, 11.04, 11.07	0.784
OPA	11.05	1.011
Controlled Service - Water Heating	14.01	1.035
Controlled Service - Interruptible	14.04, 14.05, 14.12	1.037
Controlled Service - Deferred	14.06, 14.07	0.963

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The average cost of Energy shall be determined as follows:

1. The cost of fossil fuel, as recorded in Account 151, used in the Company's generating plants, and the costs of reagents and emission allowances for the Company to operate its generating plants in compliance with the associated Federal Environmental

NORTH DAKOTA PUBLIC
 SERVICE COMMISSION
 Case No. PU-23-
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APPROVED: Bruce G. Gerhardson
 Vice President, Regulatory Affairs



Protection Agency rules and regulations. Energy from the Company's hydro generating plants shall be included at zero cost.

2. The Energy cost of purchased power included in Account 555 when such Energy is purchased on an economic dispatch basis, exclusive of Capacity or Demand charges. This includes but is not limited to net costs linked to the utility's load serving obligation, associated with participation in wholesale electric Energy markets operated by Regional Transmission Organizations, Independent System Operators or similar entities that have received Federal Energy Regulatory Commission approval to operate the Energy markets. All Midwest Independent System Operator ("MISO") Energy and Ancillary service market charges and credits relating to retail sales and asset based sales, specifically including (but not limited to) Schedule 16 and 17 charges and credits shall be included in the calculation.
3. The actual identifiable fossil and nuclear fuel costs associated with Energy purchased for reasons other than identified in 2 above.
4. The net Energy cost of Energy purchases from a renewable Energy source, including hydropower, wood, windpower, and biomass.
5. Less the fuel-related costs recovered through intersystem sales.
6. The Energy cost of avoided purchased power resulting from Hoot Lake Solar output.
7. Known MISO Planning Resource Auction capacity costs will be added to the energy adjustment rider or revenues will be credited (flow through) the energy adjustment rider. N
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Asset-based Sales Margins, as defined below and in the amount calculated as described below, shall be reflected as a credit to the Energy adjustment calculation described in 1-6, above.

Asset-based Sales Margins:

Asset-based Sales Margins are defined as wholesale Energy and ancillary services sales revenues from Company-owned generation resources less the sum of fuel, Energy costs (including costs associated with MISO markets that are recorded in FERC Account 555), and any additional transmission or other costs incurred that are required to make such sales (referred to as "margins").



Fergus Falls, Minnesota

The amount of the Asset-based Sales Margin credit shall be determined as described below: **L**

Credit calculation: The credit shall be eighty-five percent (85%) of Asset-based Sales Margins. The Asset-based Sales Margin credit shall be calculated monthly based on a forecast of the margins expected for that month and a true-up shall be made to adjust prior forecasted credits to reflect eighty-five percent (85%) of the actual margins earned in prior months. The true-up adjustments shall be made as soon as reasonably practical after the receipt of actual results and shall reflect MISO and other resettlements that would have impacted prior credits.

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APPROVED:

EFFECTIVE with bills rendered on
and after , in North Dakota

Bruce G. Gerhardson

Vice President, Regulatory Affairs