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April 7, 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 Advanced Metering Infrastructure (AMI) Planned Enhancements to its Customers Communication and Disconnection Notification Process Informational Filing

Dear Mr. Johnson:

Otter Tail Power submits this informational filing to apprise the Commission of planned enhancements to its customer communication and disconnection notification practices. These enhancements are intended to improve customer awareness, encourage engagement regarding account status, and support timely resolution through payment arrangements or available assistance programs, while maintaining appropriate customer safeguards.

Otter Tail Power has had the privilege of serving customers since 1909. Throughout our history, the Company has remained committed to reliable electric service, customer engagement, and the implementation of technologies and processes designed to enhance service delivery while maintaining just and reasonable rates.

Current Disconnection Notification Process

As part of its collection practices, Otter Tail Power currently utilizes multiple outreach methods prior to service disconnection. A written disconnection notice is mailed to the customer at least twenty-one (21) days prior to the scheduled disconnection date. In addition, automated outbound telephone calls are placed fourteen (14) days and seven (7) days prior to disconnection.

Through these communications, customers are encouraged to contact Otter Tail Power to discuss their account status, explore payment arrangement options, and obtain information regarding available assistance programs. Disconnection of service is treated as a last resort and

occurs only after reasonable efforts to engage the customer and establish payment arrangements have been unsuccessful.

If these outreach efforts do not result in customer contact or resolution, Otter Tail Power has historically dispatched a Service Representative to attempt an in-person visit at the service location for the purpose of connecting the customer with our office staff to make payment, discuss payment arrangements, or help connect the customer with energy assistance.

Evaluation of Customer Outreach Effectiveness

Otter Tail Power conducted a review of historical service order data to evaluate the effectiveness of various customer contact methods, including in-person visits and automated outbound telephone calls. Since 2021, Otter Tail Power’s personal visit success rate—defined as successful contact with the customer at the service location—has been slightly over eight percent (8%). In contrast, automated outbound calls have demonstrated a success rate of just under eighty-three percent (83%).

Otter Tail Power defines a successful automated call as one in which the full message is played, either through direct answer or voicemail. Calls that are terminated by the customer prior to message completion are also considered successful, as the customer received notice of the outreach.

This evaluation indicates that customers are significantly more likely to receive and acknowledge account-related information through automated and electronic communication channels.

New Disconnection Notification Process

Based on this analysis, Otter Tail Power intends to discontinue routine personal visits as part of its disconnection process and enhance our existing outbound communication strategy. The Company will continue automated outbound telephone calls at fourteen (14) days and seven (7) days prior to disconnection and will add additional calls at four (4) days and one (1) day prior to the scheduled disconnection date.

In addition, Otter Tail Power has implemented a disconnection notice banner within its MyMeter platform for customers who utilize this service, further expanding communication channels and customer touchpoints. A summary of notification methods is provided below.

Notification Method	Days Before Disconnection							
	21	14	10	7	5	4	1	0
Disconnection Notice	X							
** My Meter Disc Banner	X	X	X	X	X	X	X	X
Phone Call		X		X		X	X	

Customers who elect to opt out of Advanced Metering Infrastructure (AMI) metering are subject to manual disconnection and reconnection procedures. Additionally Section 9.01 of our retail rates tariff book states an opt-out customer may be subject to removal of opt-out status if the customer has incurred two or more missed payments within the preceding two

months. If an opt out customer has been disconnected, the account would be reviewed to determine if their opt out status would need to be removed. When reconnection is performed manually, applicable overtime labor and reconnection charges may apply.

Reconnection Process

Otter Tail Power utilizes remote reconnection capabilities that allow electric service to be restored promptly once account matters are resolved. Timely restoration reduces the duration of service interruption for customers and supports the efficient use of field resources, while maintaining reliable electric service.

Customers who contact the Company are provided assistance by Customer Service Representatives, who discuss payment options, payment arrangements, and available energy assistance programs. Upon establishment of an appropriate payment or payment arrangement, service may be reconnected remotely within a short timeframe.

Customers who have elected to opt out of Advanced Metering Infrastructure (AMI) metering are subject to manual reconnection. In such instances, applicable overtime labor and reconnection charges may apply. In accordance with the Company's tariffs, a non-communicating meter may be exchanged with an AMI meter at the time of reconnection.

Customer and Operational Benefits

Otter Tail Power believes these enhancements to our disconnect and reconnect processes, will improve customer awareness of account status, promote earlier engagement, and encourage customers to contact the Company to discuss payment arrangements or assistance options prior to disconnection. Expanding electronic and automated communications aligns with customer expectations for timely, accessible information while maintaining appropriate safeguards. This approach also enhances safety for field personnel by reducing routine in-person visits and limiting unnecessary exposure to potentially unsafe or confrontational situations, while allowing resources to be deployed more efficiently.

Conclusion

Disconnection of electric service remains a measure of last resort for Otter Tail Power. The enhancements described in this filing are intended to strengthen customer communication by increasing the frequency, consistency, and effectiveness of outreach prior to disconnection. By expanding automated and electronic notifications, the Company provides customers with additional opportunities to receive notice, engage with us, and take action to resolve account matters through payment arrangements or available assistance programs.

These changes are supported by a data-driven evaluation of customer contact methods and are designed to improve customer awareness while allowing for more efficient use of Company resources. Otter Tail Power believes this updated approach better aligns with enhances operational effectiveness, and continues to maintain appropriate safeguards for customers facing potential disconnection.

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Please contact me at (218) 739-8443 or ckremeier@otpc.com if you have any questions regarding this filing.

Sincerely,

/S/ COLLIN KREMEIER
Collin Kremeier
Supervisor, Customer Care & Outage Management

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Enclosures
By electronic filing and U.S. mail