

June 17, 2024



Mr. Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0480

**RE: In the Matter of the Application of Otter Tail Power Company for
Authority to Increase Rates for Electric Service in North Dakota
Case No. PU-23-342
OAH File No. 20230373
Letter**

Otter Tail Power Company (OTP) writes to inform the North Dakota Public Service Commission (Commission) of its intention to amend its application in this matter on or before July 3, 2024. As described below, OTP has conferred with the Commission's Advocacy Staff and the sole intervening party in this matter regarding the forthcoming amended application. Further, OTP has informed Commission Advisory Staff of the forthcoming filing.

OTP filed its Application in this case on November 2, 2023. Through the process of discovery and review of Advocacy Staff's direct testimony, OTP identified certain revisions to the calculation of the 2024 Test Year revenue deficiency. Revisions and refinements occur in all rate cases. Unfortunately, the refinements in this particular case result in the 2024 Test Year gross and net revenue deficiency exceeding the amounts identified in OTP's initial application. **OTP will not request any changes to interim rates in connection with the amended application.**

PROCEDURAL SCHEDULE

As discussed above, OTP has been working with Advocacy Staff and the other intervening party in this matter regarding the forthcoming amended application. OTP fully supports providing Advocacy Staff and others time to review and respond to the forthcoming amended application. OTP and the parties, after consulting with Commission Staff, have agreed to reschedule the evidentiary hearing in this matter to the Commission's next available hearing dates, on or after September 15, 2024. The parties also have agreed rebuttal testimony will not be filed on June 24, 2024. OTP and the parties will propose a revised procedural schedule to the administrative law judge after OTP files the amended application and the Commission issues an order giving notice of new hearing dates.

As stated above, OTP will file its amended application on or before July 3, 2024. The amended application will include revised schedules and will be accompanied by supplemental direct testimony to explain the revisions to OTP's 2024 Test Year revenue deficiency and accompanying rate design.

REVISED REVENUE DEFICIENCY

OTP's initial application identified a 2024 Test Year net revenue deficiency of \$17.4 million. As shown in Table 1 below, OTP's revised application will identify a 2024 Test Year net revenue deficiency of approximately \$22.6 million.

TABLE 1	
NET REVENUE DEFICIENCY RECONCILIATION	Millions
Operating Statement Items	\$ 1.7
Rate Base Items	\$ 3.5
Total Change to Net Revenue Deficiency	\$ 5.2
Originally filed Net Revenue Deficiency	\$ 17.4
Total Revised Net Revenue Deficiency	\$ 22.6

OTP will include these changes in our presentation at our June 20, 2024, Public Input Sessions.

Copies have been sent via USPS.

Please contact me at (218) 739-8395, or jfyhrie@otpc.com should you have any questions with respect to this filing.

Sincerely,

/s/ *JESSICA J. FYHRIE*

Jessica J. Fyhrie

Manager, Regulatory Proceedings

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Enclosures

By electronic filing

c: Service List

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

Case No. PU-23-342

In the Matter of Otter Tail Power
Company's Application for Authority
To Increase Rates for Electric Service
In North Dakota

CERTIFICATE OF SERVICE

Kim Ward certifies that on the 17th day of June, 2024, she served a true and correct copy of the attached letter by email addressed to the following individuals:

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Subscribed and sworn to before me this
17th day of June, 2024



Kimberly A. Ward
Notary Public

