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July 15, 2024

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VIA EMAIL (NDPSC@ND.GOV) AND U.S. MAIL
OVERNIGHT DELIVERY

Steve Kahl, Executive Secretary
North Dakota Public Service Commission
600 E. Boulevard Avenue, 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**

Dear Mr. Kahl:

Enclosed please find an original and seven (7) copies of the Midwest Large Energy Consumers' ("MLEC") Petition to Intervene in the above-referenced proceedings.

Please add the following to the official service list for this matter:

Richard Savelkoul (ND ID #6793)	Kavita Maini
Martin & Squires, P.A.	KM Energy Consulting, LLC
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Also, attached is the Certificate of Service.

Thank you for your attention to this matter. Please let me know if you have any questions.

Very truly yours,

/s/Richard J. Savelkoul

Richard J. Savelkoul

Enclosures

cc: Service List (w/encl)

CERTIFICATE OF SERVICE

I hereby certify that the original and seven (7) copies of the foregoing documents were hand delivered/mailed/e-mailed, on this 15th day of July, 2024, to the following:

Steve Kahl
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With a single copy delivered via e-mail or mail to the following:

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OAH File No. 20230373
hlhogan@nd.gov

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STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of)	Docket No. PU-23-342
Otter Tail Power Company for)	OAH File No. 20230373
Authority to Increase Rates for)	PETITION TO INTERVENE BY
Electric Service in North Dakota)	MIDWEST LARGE ENERGY
)	CONSUMERS GROUP

“Midwest Large Energy Consumers Group” or “MLEC,” by and through its undersigned counsel and pursuant to North Dakota Administrative Code 69-02-02-05, hereby petitions the North Dakota Public Services Commission (“Commission”) for intervention in the above-captioned proceedings filed by Otter Tail Power Company (“Otter Tail”). In support thereof, MLEC states as follows:

1. ND Admin. Code 69-02-02-05 provides that a petition to intervene “must be in writing and must set forth the grounds for intervention, the position and interest of the petitioner in the proceeding, what the petitioner would contribute to the hearing and whether the petitioner’s position is in support of or in opposition to the relief sought.”
2. On November 2, 2023, Otter Tail filed an Interim Rate Petition in the above-entitled Docket, to make changes in its charges for electric services provided to its North Dakota customers.
3. On July 3, 2024, Otter Tail made a filing with the Commission that materially increased its request for an increase to its rates.
4. MLEC are Otter Tail ratepayers that may be adversely affected by the proposed increase in rates submitted to the Commission. As large commercial Otter Tail customers, MLEC has direct

financial interest in all cost of service, rate, design and policy determinations by the Commission in this proceeding.

5. MLEC may present evidence through testimony, as well as cross-examination, including, but not limited to the following issues:

(a) appropriate rate of return and the cost of equity matters that Otter Tail should be entitled to;

(b) appropriate expenses that should be recovered by ratepayers; and

(c) appropriate adjustments to costs of service studies and rate design issues, if any.

6. MLEC's interest in the outcome of these proceedings will not be adequately represented by any other party, nor will MLEC's participation delay this proceeding.

7. MLEC timely requests intervention in this proceeding.

8. A copy of this petition to intervene in this proceeding has been served on all parties to this proceeding. Copies of all notices, orders or pleadings in this should be served on:

Richard Savelkoul
Martin & Squires, P.A.
332 Minnesota Street, Suite W2750
St. Paul, MN 55101
Email: rsavelkoul@martinsquires.com

With copies to:

Kavita Maini
KM Energy Consulting, LLC
961 North Lost Woods Road
Oconomowoc, WI 53066
Email: kmmaini@visi.com

WHEREFORE, for the reasons set forth above, MLEC requests that the Commission grant this timely Petition to Intervene and permit MLEC to participate in this proceeding with full rights as a party.

Respectfully submitted,

Dated: July 15, 2024

MARTIN & SQUIRES, P.A.

By 

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