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

August 19, 2025



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 and Notice of Otter Tail Power Company for Authority to Increase Rates for Electric Service in North Dakota
Case No. PU-23-342
Compliance Filing Amendment

Dear Mr. Kahl

Otter Tail Power Company (OTP) submits this Compliance Filing to amend certain rates placed in effect March 15, 2025 following the December 30, 2024 Findings of Fact, Conclusion of Law and Order of the North Dakota Public Service Commission (the Commission). Specifically, OTP has become aware that the Section 14.04, Controlled Service Interruptible Load Self-Contained and CT Metering Rider (commonly known as Dual Fuel Riders) rates placed in effect March 15, 2025 have resulted in unintended customer impacts. OTP proposes to address this issue by reducing the Section 14.04 energy rates.

OTP requests approval to implement the new Section 14.04 rates by October 1, 2025. Since OTP is seeking to reduce the Section 14.04 rates, OTP requests the Commission find good cause to allow the changes to be implemented upon less than 30 days' notice, consistent with N.D. Cent. Code § 49-05-05. Further, OTP proposes the rates be effective as of March 15, 2025. OTP will issue a one-time refund to Section 14.04 customers for usage under the rates implemented March 15, 2025. OTP anticipates this refund will occur in December 2025 or January 2026.

A summary of the reduced energy rates for Section 14.04 is included in Attachment 1 to this letter.

This filing includes legislative and non-legislative versions of Section 14.04 of our electric tariff in Attachment 2.

A copy of the customer notice (Attachment 3) will be included as a bill insert distributed to affected customers during the month in which the updated rates become effective, reflecting our proposed October 1, 2025 implementation date.



Mr. Kahl August 19, 2025 Page 2

OTP has communicated with North Dakota Commission advocacy staff and the Midwest Large Energy Consumers (MLEC), and both parties have indicated agreement with this recommendation.

An original and seven copies of this filing are being sent via Fed Ex.

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

Sincerely,

/s/JESSICA FYHRIE Jessica Fyhrie Manager, Regulatory Proceedings Otter Tail Power Company

kaw Enclosures By electronic filing c: Service List

Revised Interruptible Rates Billing Units Proposed Rate (Final) Proposed Rate (Revised)
Summer Winter Annual Summer Winter Summer Winter Annual Increase Annual Increase Annual Increase Annual Increase Annual Increase
Controlled Service Interruptible
14.04 Controlled Service - Interruptible Load Rider CT Metering - Option 1 (Rates 170, 165, 881)
Customer Charge Bills 2,619 \$ 20.20 \$ 20.20 \$ 20.20 \$ 52,908 \$ - \$ 52,908 \$ 52,908 \$ - \$ - \$ - \$ -
Facilities Charge kW 558,708 \$ 1.42 \$
Energy - All kWh kWh 8,360,599 57,621,234 65,981,833 80.02135 80.01851 8 0.01637 80.01419 5 670,355 1,244,997 5 574,642 8 670,355 9 54,508 284,153 8 - \$ (290,489) \$ (290,489) \$
Penalty kWh - \$ 0.18412 \$ 0.20847 \$ 0.18412 \$ 0.20847 \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$
Base Revenue: \$ 1,147,881 \$ 2,089,333 \$ 941,452 \$ 1,147,881 \$ 1,800,782 \$ 652,900 \$ - \$ (288,552) \$ (288,552)
14.04 Controlled Service - Interruptible Load Rider CT Metering - Option 2 (Rates 168, 268, 169, 269)
Customer Charge Bills 122 \$ 20.20 \$ 20.20 \$ 20.20 \$ 20.20 \$ 2.458 \$ - \$ 2,458 \$ - \$ - \$ - \$ -
Facilities Charge kW 9.301 \$ 1.42 \$ 1.42 \$ 1.42 \$ 1.42 \$ 1.42 \$ 1.45 \$ 7,069 \$ 13,175 \$ 6,106 \$ 7,069 \$ 13,207 \$ 6,139 \$ - \$ 32 \$ 32
Energy - All kWh 69,359 806,935 876,294 80.02135 80.01851 8 0.01637 80.01419 8 8,880 16,416 8 7,536 8 8,880 12,586 3,706 8 - \$ (3,830) \$ (3,830)
Control Period Demand kW - \$ 14.50 \$ 14.45 \$ 14.50 \$ 14.45 <mark>\$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$ </mark>
Base Revenue: \$ 18,407 \$ 32,049 \$ 13,643 \$ 18,407 \$ 28,251 \$ 9,844 \$ - \$ (3,798) \$ (3,798)
14.05 Controlled Service - Interruptible Load Rider Self-Contained Metering (Rates 190, 185, 882)
Customer Charge Bills 85,305 \$ 8.50 \$ 8.50 \$ 8.50 \$ 8.50 \$ 725,093 \$ - \$ 725,093 \$ - \$ - \$ - \$ -
Facilities Charge Bills 85.305 \$1.1.70 \$11.70 \$11.70 \$998,069 \$998,069 \$989,069 \$998,069 \$989,069 \$-\$ \$989,069 \$-\$
Penalty kWh \$ 0.18412 \$ 0.20847 \$ 0.18412 \$ 0.20847 \$ - \$ - \$ - \$ - \$ - \$ - \$ - \$
Base Revenue: \$ 2,971.763 \$ 5,241.483 \$ 2.269.721 \$ 2,971.763 \$ 4,418.037 \$ 1,446.274 \$ - \$ (823.446)
Total Adjustments: \$ 7,012,588 \$ 5,681,699 \$ (1,330,889) \$ 6,885,035 \$ 5,711,523 \$ (1,173,512) \$ (127,553) \$ 29,824 \$ 157,376
Revenue Adjustment: \$ 940,685 \$ (105,544) \$ (1,046,229)
Revenue Aujustinent:
Total Base Revenue for the COSS Class: \$ 5.078.735 \$ 7.362.866 \$ 3.224.815 \$ 4.032.506 \$ 6.247.070 \$ 2.109.019 \$ (1.046.229) \$ (1.115.796) \$ (
Total Adjustments for the COSC class: 8 7,012.588 8 5,681.699 8 (4,330,889) 8 6,885.035 8 5,711.523 8 (1,173,512) 8 (127,533) 8 1,173,797 8 (1,173,512) 8 (1,173,512) 8 (1,173,512) 8 (1,173,512)
Total for the COSC class: \$12.09.1.323 \$13.044.565 \$1.893.926 \$10.917.541 \$11.958.593 \$13.507 \$1.173.525 \$1.25.507 \$1.173.525 \$1.25.507
\$16,17,000 \$10,077,000 \$10,077,000 \$11,707

Attachment 2

Legislative and Non-Legislative Versions of

Tariff Sheet ND 14.04 – Controlled Service – Interruptible Load
Self-Contained and CT Metering Rider



North Dakota, Section 14.04 ELECTRIC RATE SCHEDULE Controlled Service – Interruptible Load Self-Contained and CT Metering Rider Page 2 of 4

TwelfthEleventh Revision

CT with ancillary load: The Company retains the authority to allow a portion of the load used to deliver conditioned air and/or water during the control period to remain on during control periods in situations where 1) it is functionally or financially unfeasible to separately serve the equipment's control systems, or other critical ancillary equipment associated with this load, or 2) if the separation would violate the manufacturer's Underwriters Laboratory (UL) approval or other industry recognized operating standards.

For CT Metering with ancillary load, during the control period the amount of ancillary load shall not exceed 5% of the metered maximum Demand measured during any period within the most recent 12 months. (For example, although a minimal amount of fan and/or pump load may be allowed under this provision, it is not intended to be applied to larger loads such as the non-conditioned fan load on low-temperature grain drying.)

If the Customer does not have a back-up heating system, it is not automatic, or it is inadequate, then the Company requires a primary electric heating Customer served on an interruptible rate to complete a Controlled Service Agreement acknowledging that the Customer is aware of the potential for property damage.

RATE:

SELF-CONTAINED METERING					
Customer Charge per Month:	\$8.50				
Monthly Minimum Bill:	Customer + Facilities Charge				
Facilities Charge per Month:	\$11.70				
	Summ	ıer	Winter		
Energy Charge per kWh:	3.035 <u>2.325</u>	¢/kWh	2.631 2.015	¢/kWh	
Penalty:	18.412	¢/kWh	20.847	¢/kWh	
During the Penalty Period, kWhs use Penalty listed above.		,	'	,	

North Dakota, Section 14.04 ELECTRIC RATE SCHEDULE Controlled Service – Interruptible Load Self-Contained and CT Metering Rider Page 3 of 4

Thirteenth Twelfth Revision

CT METERING WITHOUT ANCILLARY LOAD

Customer Charge per Month: \$20.20

Monthly Minimum Bill: Customer + Facilities Charge

Facilities Charge per Month

per annual maximum kW: \$1.42 /kW

 Summer
 Winter

 Energy Charge per kWh:
 2.1351.637 ¢/kWh
 1.8511.419 ¢/kWh
 ¢/kWh

 Penalty:
 18.412 ¢/kWh
 20.847 ¢/kWh

During the Penalty Period, kWhs used will be measured and billed at the Energy Charge and Penalty listed above.

CT METERING WITH ANCILLARY LOAD

Customer Charge per Month: \$20.20

Monthly Minimum Bill: Customer + Facilities Charge

Facilities Charge per Month

per annual maximum kW: \$1.42 /kW

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply or Voluntary Rate Riders selected by the Customer. See Sections 12.00, 13.00 and 14.00 of the North Dakota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30. Winter: October 1 through May 31.

North Dakota, Section 14.04 ELECTRIC RATE SCHEDULE Controlled Service – Interruptible Load Self-Contained and CT Metering Rider Page 2 of 4

Twelfth Revision

<u>CT with ancillary load</u>: The Company retains the authority to allow a portion of the load used to deliver conditioned air and/or water during the control period to remain on during control periods in situations where 1) it is functionally or financially unfeasible to separately serve the equipment's control systems, or other critical ancillary equipment associated with this load, or 2) if the separation would violate the manufacturer's Underwriters Laboratory (UL) approval or other industry recognized operating standards.

For CT Metering with ancillary load, during the control period the amount of ancillary load shall not exceed 5% of the metered maximum Demand measured during any period within the most recent 12 months. (For example, although a minimal amount of fan and/or pump load may be allowed under this provision, it is not intended to be applied to larger loads such as the non-conditioned fan load on low-temperature grain drying.)

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RATE:

SELF-CONTAINED METERING					
Customer Charge per Month:	\$8.50				
Monthly Minimum Bill:	Customer + Facilities Charge				
Facilities Charge per Month:	\$11.70				
	Summ	ier	Winter		
Energy Charge per kWh:	2.325	¢/kWh	2.015	¢/kWh	
Penalty:	18.412	¢/kWh	20.847	¢/kWh	

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North Dakota, Section 14.04 ELECTRIC RATE SCHEDULE Controlled Service – Interruptible Load Self-Contained and CT Metering Rider Page 3 of 4

Thirteenth Revision

R

R

CT METERING WITHOUT ANCILLARY LOAD

Customer Charge per Month: \$20.20

Monthly Minimum Bill: Customer + Facilities Charge

Facilities Charge per Month

per annual maximum kW: \$1.42 /kW

 Summer
 Winter

 Energy Charge per kWh:
 1.637 ¢/kWh
 1.419 ¢/kWh

 Penalty:
 18.412 ¢/kWh
 20.847 ¢/kWh

During the Penalty Period, kWhs used will be measured and billed at the Energy Charge and Penalty listed above.

CT METERING	WITH ANCILLARY LOAD	

Customer Charge per Month: \$20.20

Monthly Minimum Bill: Customer + Facilities Charge

Facilities Charge per Month

per annual maximum kW: \$1.42 /kW

_	Summer		Winter	
Energy Charge per kWh:	1.637	¢/kWh	1.419	¢/kWh
Control Period Demand Charge per kW:	\$14.50	/kW	\$14.45	/kW

MANDATORY AND VOLUNTARY RIDERS: The amount of a bill for service will be modified by any Mandatory Rate Riders that must apply or Voluntary Rate Riders selected by the Customer. See Sections 12.00, 13.00 and 14.00 of the North Dakota electric rates for the matrices of riders.

DEFINITIONS OF SEASONS:

Summer: June 1 through September 30. Winter: October 1 through May 31.

NORTH DAKOTA PUBLIC SERVICE COMMISSION Case No. PU-23-342 Approved by order dated EFFECTIVE with bills rendered on and after March 15, 2025, in North Dakota

APPROVED: Stuart D. Tommerdahl Manager, Regulation & Retail Energy Solutions

Customer notice

The North Dakota Public Service Commission approved an adjustment to our Controlled Service Interruptible Load Self-Contained and CT Metering Rider. As a result, we'll decrease these energy rates starting October 1, 2025. Impacted customers will also receive a prorated refund dating back to March 15, 2025, when the old rates went into effect.

Description	Old rates		New rates		
	Summer	Winter	Summer	Winter	
Self-Contained Metering	3.035 ¢/kWh	2.631 ¢/kWh	2.325 ¢/kWh	2.015 ¢/kWh	
CT Metering without Ancillary Load	2.135 ¢/kWh	1.851 ¢/kWh	1.637¢/kWh	1.419 ¢/kWh	
CT Metering with Ancillary Load	2.135 ¢/kWh	1.851 ¢/kWh	1.637 ¢/kWh	1.419 ¢/kWh	

For more information, contact us at 800-257-4044 or visit otpco.com.

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 19th of August, 2025, she served a true and correct copy of the attached Compliance Filing Amendment by email addressed to the following individuals:

Steve Kahl Director of Admin./Exec. Secretary ND Public Service Commission ndpsc@nd.gov

John Schuh General Counsel ND Public Service Commission jschuh@nd.gov

Brian Johnson Legal Counsel ND Public Service Commission brljohnson@nd.gov

Hope L. Hogan Administrative Law Judge OAH File No. 20230373 hlhogan@nd.gov

Mitchell D. Armstrong Jon C. Lengowski Special Assistant Attorneys General for PSC Advocacy Staff marmstrong@smithporsborg.com

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Richard Savelkoul Martin & Squires, P.A. rsavelkoul@martinsquires.com

Kavita Maini KM Energy Consulting LLC kmaini@visi.com

Patrick Zomer Moss & Barnett Pat.Zomer@lawmoss.com

Subscribed and sworn to before me this 19th day of Hugust , 2025

Notary Public