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May 5, 2025

Steve Kahl
Executive Secretary/Director of Administration
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0408

**RE: Annual Depreciation Rates Amended PSC Order dated June 23, 1992
Case No. PU-401-88-374
Compliance Filing**

Dear Mr. Kahl:

Pursuant to the above-referenced order, enclosed is a worksheet, identified as Statement B. This Statement shows the total estimated impact of changes in depreciation rates for North Dakota. Page 3 of Statement B shows the estimated impact to be an increase in annual depreciation expense of \$135,266 for the North Dakota Jurisdiction.

Also included with this filing is the Minnesota Public Utilities Commission (MPUC) Order dated March 4, 2025 (Order)¹ certifying proposed remaining lives and net salvage percentages. This Order certifies depreciation rates and methods based on Otter Tail Power Company's (Otter Tail Power) most recent depreciation study.

The MPUC approved depreciation rates for the Jamestown and Lake Preston peaking units that appropriately reflect an anticipated year of final retirement of 2033. This order point is provided on page 1 of the Order. The parameters are effective January 1, 2025.

A copy of Otter Tail Power's initial Annual Review of Depreciation Certification filing (Initial Filing) submitted to the MPUC on August 30, 2024, is enclosed in this compliance filing. Attachment 2 of the Initial Filing lists the remaining lives and net salvage, or amortization periods, requested for certification. The MPUC Order dated October 1, 2020,² requires an annual compliance filing with an updated Petition Attachment 2. Otter Tail Power submitted the required annual compliance filing on April 4, 2025, and a copy has been included in this compliance filing.

¹ Docket No. E-017/D-24-302.

² Docket No. E-017/D-19-547.

1 PU-25-181 Filed 05/05/2025 Pages: 114
Compliance Filing - 2025 Annual Depreciation Rates

Otter Tail Power Company
Derek Haugen, Rates Analyst

Mr. Kahl
May 5, 2025
Page 2

Copies of this filing have been sent to you via USPS.

These items are filed for your information. If you have any questions, please contact me at 218-739-8444 or dhaugen@otpc.com.

Sincerely,

/s/ DEREK HAUGEN
Derek Haugen
Rates Analyst
Regulatory Economics

lcd
Enclosures
By electronic filing and U.S. Mail

Estimated Impact on North Dakota

Statement B

2024 Technical Update



**North Dakota
(Statement B)**

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | North Dakota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|--------------------------------------|------------------------|---------------------|------------------------|---------------------|--------------------|--------------------|
| | | | Total | North Dakota | Total | North Dakota | Total | North Dakota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| INTANGIBLE PLANT | | | | | | | | |
| 303.91 Software - 5 Year | \$ 6,502,291 | 0.42335250 | \$ 1,300,458 | \$ 550,552 | \$ 1,300,458 | \$ 550,552 | \$ - | \$ - |
| 303.92 Software - 10 Year | 29,911,445 | 0.42335250 | 2,991,145 | 1,266,309 | 2,991,145 | 1,266,309 | | |
| Total Intangible Plant | \$ 36,413,736 | | \$ 4,291,603 | \$ 1,816,861 | \$ 4,291,603 | \$ 1,816,861 | \$ - | \$ - |
| STEAM PRODUCTION | | | | | | | | |
| 311.00 Structures and Improvements | \$ 115,762,535 | 0.40855785 | \$ 2,829,650 | \$ 1,156,075 | \$ 2,825,076 | \$ 1,154,207 | \$ (4,574) | \$ (1,868) |
| 312.00 Boiler Plant Equipment | 308,837,650 | 0.40855785 | 9,617,952 | 3,929,490 | 9,639,443 | 3,938,270 | 21,491 | 8,780 |
| 312.10 Boiler Plant Equipment - Landfill | 11,200,043 | 0.40855785 | 249,761 | 102,042 | 138,881 | 56,741 | (110,880) | (45,301) |
| 314.00 Turbogenerator Units | 58,019,031 | 0.40855785 | 1,227,070 | 501,329 | 1,331,147 | 543,851 | 104,077 | 42,522 |
| 315.00 Accessory Electric Equipment | 33,251,144 | 0.40855785 | 746,871 | 305,140 | 745,983 | 304,777 | (888) | (363) |
| 316.00 Miscellaneous Power Plant Equipment | 6,042,253 | 0.40855785 | 187,263 | 76,508 | 188,705 | 77,097 | 1,442 | 589 |
| Total Steam Production Plant | \$ 533,112,656 | | \$14,858,567 | \$ 6,070,584 | \$14,869,235 | \$ 6,074,943 | \$ 10,668 | \$ 4,359 |
| HYDRAULIC PRODUCTION | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,672,033 | 0.40855785 | \$ 5,434 | \$ 2,220 | \$ 26,042 | \$ 10,640 | \$ 20,608 | \$ 8,420 |
| 332.00 Reservoirs, Dams and Waterways | 6,376,375 | 0.40855785 | 108,370 | 44,275 | 114,665 | 46,847 | 6,295 | 2,572 |
| 333.00 Water Wheels, Turbines & Generators | 1,051,180 | 0.40855785 | 989 | 405 | 989 | 405 | | |
| 334.00 Accessory Electric Equipment | 1,773,378 | 0.40855785 | 30,133 | 12,310 | 31,836 | 13,006 | 1,703 | 696 |
| 335.00 Miscellaneous Power Plant Equipment | 670,502 | 0.40855785 | 1,411 | 577 | (358) | (146) | (1,769) | (723) |
| Total Hydraulic Production Plant | \$ 11,543,468 | | \$ 146,337 | \$ 59,787 | \$ 173,174 | \$ 70,752 | \$ 26,837 | \$ 10,965 |
| OTHER PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 30,950,888 | 0.40899408 | \$ 945,787 | \$ 386,408 | \$ 943,093 | \$ 385,308 | \$ (2,694) | \$ (1,100) |
| 342.00 Fuel Holders and Accessories | 7,762,795 | 0.40899408 | 239,686 | 97,926 | 226,591 | 92,576 | (13,095) | (5,350) |
| 343.00 Prime Movers | 140,588,439 | 0.40899408 | 4,317,114 | 1,763,792 | 4,300,235 | 1,756,895 | (16,879) | (6,897) |
| 345.00 Accessory Electric Equipment | 9,329,465 | 0.40899408 | 278,367 | 113,730 | 272,514 | 111,338 | (5,853) | (2,392) |
| 346.00 Miscellaneous Power Plant Equipment | 1,906,954 | 0.40899408 | 59,214 | 24,192 | 57,631 | 23,547 | (1,583) | (645) |
| Total Other Production Plant | \$ 190,538,541 | | \$ 5,840,168 | \$ 2,386,048 | \$ 5,800,064 | \$ 2,369,664 | \$ (40,104) | \$ (16,384) |
| WIND PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 19,987,630 | 0.40899408 | \$ 602,087 | \$ 246,249 | \$ 605,536 | \$ 247,660 | \$ 3,449 | \$ 1,411 |
| 344.00 Generators | 547,928,855 | 0.40899408 | 16,819,301 | 6,878,995 | 16,975,339 | 6,942,814 | 156,038 | 63,819 |
| 345.00 Accessory Electric Equipment | 44,943,664 | 0.40899408 | 1,352,799 | 553,287 | 1,384,951 | 566,436 | 32,152 | 13,149 |
| 346.00 Miscellaneous Power Plant Equipment | 653,553 | 0.40899408 | 29,937 | 12,244 | 31,154 | 12,741 | 1,217 | 497 |
| Total Wind Production Plant | \$ 613,513,702 | | \$18,804,124 | \$ 7,690,775 | \$18,996,980 | \$ 7,769,651 | \$ 192,856 | \$ 78,876 |
| SOLAR PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,868,482 | 0.03360476 | \$ 60,459 | \$ 524 | \$ 63,578 | \$ 521 | \$ 3,119 | \$ (3) |
| 345.00 Accessory Electric Equipment | 57,267,142 | 0.03360476 | 1,846,835 | 5,032 | 1,943,631 | 5,008 | 96,796 | (24) |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 0.03360476 | 19,726 | | 20,768 | | 1,042 | |
| Total Solar Production Plant | \$ 59,748,238 | | \$ 1,927,020 | \$ 5,556 | \$ 2,027,977 | \$ 5,529 | \$ 100,957 | \$ (27) |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 | North Dakota | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|---|-----------------------|--------------|------------------------|---------------------|------------------------|---------------------|------------------|------------------|
| | Plant Investment | | Allocation Factor | Total | North Dakota | Total | North Dakota | Total |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| TRANSMISSION PLANT | | | | | | | | |
| 353.00 Station Equipment | \$ 189,552,423 | 0.37019360 | \$ 2,957,018 | \$ 1,094,669 | \$ 2,938,063 | \$ 1,087,652 | \$ (18,955) | \$ (7,017) |
| 354.00 Towers and Fixtures | 197,050,600 | 0.37019360 | 2,699,593 | 999,372 | 2,699,593 | 999,372 | | |
| 355.00 Poles and Fixtures | 174,132,190 | 0.37019360 | 3,012,487 | 1,115,203 | 3,047,313 | 1,128,096 | 34,826 | 12,893 |
| 356.00 Overhead Conductors and Devices | 193,157,663 | 0.37019360 | 2,935,996 | 1,086,887 | 2,955,312 | 1,094,038 | 19,316 | 7,151 |
| 358.00 Underground Conductors and Devices | 77,461 | 0.37019360 | 1,084 | 401 | 201 | 74 | (883) | (327) |
| Total Transmission Plant | \$ 753,970,337 | | \$11,606,178 | \$ 4,296,532 | \$11,640,482 | \$ 4,309,232 | \$ 34,304 | \$ 12,700 |
| DISTRIBUTION PLANT | | | | | | | | |
| 362.00 Station Equipment | \$ 100,507,890 | 0.45064580 | \$ 2,130,767 | \$ 960,221 | \$ 2,120,716 | \$ 955,692 | \$ (10,051) | \$ (4,529) |
| 364.00 Poles, Towers and Fixtures | 90,210,134 | 0.45064580 | 2,958,892 | 1,333,412 | 2,967,913 | 1,337,478 | 9,021 | 4,066 |
| 365.00 Overhead Conductors and Devices | 63,365,052 | 0.45064580 | 1,311,657 | 591,093 | 1,330,666 | 599,659 | 19,009 | 8,566 |
| 367.00 Underground Conductors and Devices | 134,078,350 | 0.45064580 | 2,426,818 | 1,093,635 | 2,507,265 | 1,129,888 | 80,447 | 36,253 |
| 368.00 Line Transformers | 135,607,045 | 0.45064580 | 2,196,834 | 989,994 | 2,196,834 | 989,994 | | |
| 369.00 Overhead Services | 14,304,116 | 0.45064580 | 1,142,899 | 515,043 | 1,145,760 | 516,332 | 2,861 | 1,289 |
| 369.10 Underground Services | 51,993,089 | 0.45064580 | 1,445,408 | 651,367 | 1,445,408 | 651,367 | | |
| 370.00 Meters | 28,368,846 | 0.45064580 | 848,228 | 382,250 | 828,370 | 373,301 | (19,858) | (8,949) |
| 370.05 Smart Meters | 921,313 | 0.45064580 | 47,816 | 21,548 | 48,000 | 21,631 | 184 | 83 |
| 370.10 Load Management Switches | 8,899,439 | 0.45064580 | 13,349 | 6,016 | 4,450 | 2,005 | (8,899) | (4,011) |
| 371.10 Electric Vehicle Charging Stations | 26,200 | 0.45064580 | 2,620 | 1,181 | 2,620 | 1,181 | | |
| 371.20 Other Private Lighting | 10,185,838 | 0.45064580 | 583,649 | 263,019 | 579,574 | 261,183 | (4,075) | (1,836) |
| 373.00 Street Lighting and Signal Systems | 14,586,957 | 0.45064580 | 851,878 | 383,895 | 872,300 | 393,098 | 20,422 | 9,203 |
| Total Distribution Plant | \$ 653,054,269 | | \$15,960,815 | \$ 7,192,674 | \$16,049,876 | \$ 7,232,809 | \$ 89,061 | \$ 40,135 |
| GENERAL PLANT | | | | | | | | |
| Depreciable | | | | | | | | |
| 390.00 Structures and Improvements | \$ 26,108,301 | 0.42335250 | \$ 519,555 | \$ 219,955 | \$ 511,723 | \$ 216,639 | \$ (7,832) | \$ (3,316) |
| 390.10 General Office Buildings | 6,451,486 | 0.42335250 | 47,096 | 19,938 | 47,741 | 20,211 | 645 | 273 |
| 390.20 Fleet Service Center Building | 896,880 | 0.42335250 | (12,287) | (5,202) | (3,229) | (1,367) | 9,058 | 3,835 |
| 390.25 Fleet Service Center - Jamestown | 2,154,593 | 0.42335250 | (23,270) | (9,851) | (23,916) | (10,125) | (646) | (274) |
| 390.30 Central Stores Building | 4,494,284 | 0.42335250 | (48,988) | (20,739) | (37,303) | (15,792) | 11,685 | 4,947 |
| 396.00 Power Operated Equipment | 1,749,199 | 0.42335250 | 77,490 | 32,806 | 75,740 | 32,065 | (1,750) | (741) |
| 397.40 Communication Towers | 1,922,046 | 0.42335250 | 32,483 | 13,752 | 32,290 | 13,670 | (193) | (82) |
| Total Depreciable | \$ 43,776,789 | | \$ 592,079 | \$ 250,659 | \$ 603,046 | \$ 255,301 | \$ 10,967 | \$ 4,642 |
| Amortizable | | | | | | | | |
| 391.00 Office Furniture | \$ 471,009 | 0.42335250 | \$ 31,416 | \$ 13,300 | \$ 31,416 | \$ 13,300 | \$ - | \$ - |
| 391.10 Office Equipment | 186,048 | 0.42335250 | 18,605 | 7,876 | 18,605 | 7,876 | | |
| 391.20 Duplicating Equipment | 835,707 | 0.42335250 | 83,571 | 35,380 | 83,571 | 35,380 | | |
| 391.50 Computer Systems | 3,342,987 | 0.42335250 | 668,597 | 283,052 | 668,597 | 283,052 | | |
| 391.60 Computer Related Equipment | 4,539,752 | 0.42335250 | 907,950 | 384,383 | 907,950 | 384,383 | | |
| 394.00 Tools, Shop and Garage Equipment | 5,451,853 | 0.42335250 | 363,639 | 153,947 | 363,639 | 153,947 | | |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 | North Dakota | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|------------------------|--------------|------------------------|---------------------|------------------------|---------------------|---------------------|--------------------|
| | Plant | | Allocation | Total | North Dakota | Total | North Dakota | Total |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| 394.20 Automated Meter Reading Equipment | 401,984 | 0.42335250 | 26,812 | 11,351 | 26,812 | 11,351 | | |
| 397.00 Communication Equipment | 4,869,774 | 0.42335250 | 324,814 | 137,511 | 324,814 | 137,511 | | |
| 397.10 Radio Telecommunication Equipment | 464,016 | 0.42335250 | 46,402 | 19,644 | 46,402 | 19,644 | | |
| 397.20 Microwave Equipment | 3,920,364 | 0.42335250 | 261,488 | 110,702 | 261,488 | 110,702 | | |
| 397.30 Radio Load Control Equipment | 165,980 | 0.42335250 | 16,598 | 7,027 | 16,598 | 7,027 | | |
| Total Amortizable | \$ 24,649,474 | | \$ 2,749,892 | \$ 1,164,173 | \$ 2,749,892 | \$ 1,164,173 | \$ - | \$ - |
| Total General Plant | \$ 68,426,263 | | \$ 3,341,971 | \$ 1,414,832 | \$ 3,352,938 | \$ 1,419,474 | \$ 10,967 | \$ 4,642 |
| TOTAL UTILITY | \$2,920,321,210 | | \$76,776,783 | \$30,933,649 | \$77,202,329 | \$31,068,915 | \$ 425,546 | \$ 135,266 |
| STEAM PRODUCTION | | | | | | | | |
| Big Stone | | | | | | | | |
| 311.00 Structures and Improvements | \$ 80,758,219 | 0.40855785 | \$ 2,245,078 | \$ 917,244 | \$ 2,237,003 | \$ 913,945 | \$ (8,075) | \$ (3,299) |
| 312.00 Boiler Plant Equipment | 201,385,686 | 0.40855785 | 7,028,360 | 2,871,492 | 7,028,360 | 2,871,492 | | |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 31,809,484 | 0.40855785 | 553,485 | 226,131 | 578,933 | 236,528 | 25,448 | 10,397 |
| 315.00 Accessory Electric Equipment | 21,066,041 | 0.40855785 | 528,758 | 216,028 | 526,651 | 215,167 | (2,107) | (861) |
| 316.00 Miscellaneous Power Plant Equipment | 3,617,809 | 0.40855785 | 98,043 | 40,056 | 100,213 | 40,943 | 2,170 | 887 |
| Total Big Stone | \$ 338,637,239 | | \$10,453,724 | \$ 4,270,951 | \$10,471,160 | \$ 4,278,075 | \$ 17,436 | \$ 7,124 |
| Hoot Lake Units 2 and 3 | | | | | | | | |
| 311.00 Structures and Improvements | \$ - | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 312.00 Boiler Plant Equipment | | | | | | | | |
| 312.10 Boiler Plant Equipment - Landfill | 11,200,043 | 0.40855785 | 249,761 | 102,042 | 138,881 | 56,741 | (110,880) | (45,301) |
| 314.00 Turbogenerator Units | | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | | |
| Total Hoot Lake Units 2 and 3 | \$ 11,200,043 | | \$ 249,761 | \$ 102,042 | \$ 138,881 | \$ 56,741 | \$ (110,880) | \$ (45,301) |
| Coyote | | | | | | | | |
| 311.00 Structures and Improvements | \$ 35,004,316 | 0.40855785 | \$ 584,572 | \$ 238,831 | \$ 588,073 | \$ 240,262 | \$ 3,501 | \$ 1,431 |
| 312.00 Boiler Plant Equipment | 107,451,964 | 0.40855785 | 2,589,592 | 1,057,998 | 2,611,083 | 1,066,778 | 21,491 | 8,780 |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 26,209,547 | 0.40855785 | 673,585 | 275,198 | 752,214 | 307,323 | 78,629 | 32,125 |
| 315.00 Accessory Electric Equipment | 12,185,103 | 0.40855785 | 218,113 | 89,112 | 219,332 | 89,610 | 1,219 | 498 |
| 316.00 Miscellaneous Power Plant Equipment | 2,424,444 | 0.40855785 | 89,220 | 36,452 | 88,492 | 36,154 | (728) | (298) |
| Total Coyote | \$ 183,275,374 | | \$ 4,155,082 | \$ 1,697,591 | \$ 4,259,194 | \$ 1,740,127 | \$ 104,112 | \$ 42,536 |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | North Dakota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|--------------------------------------|------------------------|------------------|------------------------|------------------|------------------|-----------------|
| | | | Total | North Dakota | Total | North Dakota | Total | North Dakota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| HYDRAULIC PRODUCTION | | | | | | | | |
| Hoot Lake | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,422,555 | 0.40855785 | \$ 427 | \$ 174 | \$ 21,054 | \$ 8,602 | \$ 20,627 | \$ 8,428 |
| 332.00 Reservoirs, Dams and Waterways | 390,152 | 0.40855785 | 6,086 | 2,486 | 2,029 | 829 | (4,057) | (1,657) |
| 333.00 Water Wheels, Turbines & Generators | 104,195 | 0.40855785 | 31 | 13 | 31 | 13 | | |
| 334.00 Accessory Electric Equipment | 1,216,302 | 0.40855785 | 29,556 | 12,075 | 31,259 | 12,771 | 1,703 | 696 |
| 335.00 Miscellaneous Power Plant Equipment | 285,348 | 0.40855785 | 656 | 268 | (1,113) | (455) | (1,769) | (723) |
| Total Hoot Lake | \$ 3,418,552 | | \$ 36,756 | \$ 15,016 | \$ 53,260 | \$ 21,760 | \$ 16,504 | \$ 6,744 |
| Wright | | | | | | | | |
| 331.00 Structures and Improvements | \$ 20,080 | 0.40855785 | \$ 40 | \$ 16 | \$ 40 | \$ 16 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 973,942 | 0.40855785 | 2,045 | 836 | 4,091 | 1,671 | 2,046 | 835 |
| 333.00 Water Wheels, Turbines & Generators | 545,392 | 0.40855785 | 436 | 178 | 436 | 178 | | |
| 334.00 Accessory Electric Equipment | 202,552 | 0.40855785 | 223 | 91 | 223 | 91 | | |
| 335.00 Miscellaneous Power Plant Equipment | 115,218 | 0.40855785 | 196 | 80 | 196 | 80 | | |
| Total Wright | \$ 1,857,184 | | \$ 2,940 | \$ 1,201 | \$ 4,986 | \$ 2,036 | \$ 2,046 | \$ 835 |
| Pisgah | | | | | | | | |
| 331.00 Structures and Improvements | \$ 13,172 | 0.40855785 | \$ 34 | \$ 14 | \$ 34 | \$ 14 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 2,189,300 | 0.40855785 | 70,933 | 28,980 | 70,277 | 28,712 | (656) | (268) |
| 333.00 Water Wheels, Turbines & Generators | 159,732 | 0.40855785 | 224 | 92 | 224 | 92 | | |
| 334.00 Accessory Electric Equipment | 102,487 | 0.40855785 | 133 | 54 | 133 | 54 | | |
| 335.00 Miscellaneous Power Plant Equipment | 62,744 | 0.40855785 | 151 | 62 | 151 | 62 | | |
| Total Pisgah | \$ 2,527,435 | | \$ 71,475 | \$ 29,202 | \$ 70,819 | \$ 28,934 | \$ (656) | \$ (268) |
| Dayton Hollow | | | | | | | | |
| 331.00 Structures and Improvements | \$ 181,086 | 0.40855785 | \$ 4,926 | \$ 2,013 | \$ 4,907 | \$ 2,005 | \$ (19) | \$ (8) |
| 332.00 Reservoirs, Dams and Waterways | 2,118,681 | 0.40855785 | 28,390 | 11,599 | 34,746 | 14,196 | 6,356 | 2,597 |
| 333.00 Water Wheels, Turbines & Generators | 226,751 | 0.40855785 | 295 | 121 | 295 | 121 | | |
| 334.00 Accessory Electric Equipment | 193,342 | 0.40855785 | 174 | 71 | 174 | 71 | | |
| 335.00 Miscellaneous Power Plant Equipment | 110,889 | 0.40855785 | 244 | 100 | 244 | 100 | | |
| Total Dayton Hollow | \$ 2,830,749 | | \$ 34,029 | \$ 13,904 | \$ 40,366 | \$ 16,493 | \$ 6,337 | \$ 2,589 |
| Taplin Gorge | | | | | | | | |
| 331.00 Structures and Improvements | \$ 35,140 | 0.40855785 | \$ 7 | \$ 3 | \$ 7 | \$ 3 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 704,300 | 0.40855785 | 916 | 374 | 3,522 | 1,439 | 2,606 | 1,065 |
| 333.00 Water Wheels, Turbines & Generators | 15,110 | 0.40855785 | 3 | 1 | 3 | 1 | | |
| 334.00 Accessory Electric Equipment | 58,695 | 0.40855785 | 47 | 19 | 47 | 19 | | |
| 335.00 Miscellaneous Power Plant Equipment | 96,303 | 0.40855785 | 164 | 67 | 164 | 67 | | |
| Total Taplin Gorge | \$ 909,548 | | \$ 1,137 | \$ 464 | \$ 3,743 | \$ 1,529 | \$ 2,606 | \$ 1,065 |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | North Dakota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|--------------------------------------|------------------------|-------------------|------------------------|-------------------|--------------------|--------------------|
| | | | Total | North Dakota | Total | North Dakota | Total | North Dakota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| OTHER PRODUCTION | | | | | | | | |
| Jamestown | | | | | | | | |
| 341.00 Structures and Improvements | \$ 311,512 | | \$ 6,592 | \$ 2,693 | \$ 3,988 | \$ 1,630 | \$ (2,604) | \$ (1,063) |
| 342.00 Fuel Holders and Accessories | 415,964 | | 12,159 | 4,968 | 7,259 | 2,966 | (4,900) | (2,002) |
| 343.00 Prime Movers | 7,168,816 | | 125,153 | 51,133 | 87,871 | 35,900 | (37,282) | (15,233) |
| 345.00 Accessory Electric Equipment | 227,590 | | 5,965 | 2,437 | 3,583 | 1,464 | (2,382) | (973) |
| 346.00 Miscellaneous Power Plant Equipment | 88,665 | | 3,183 | 1,300 | 1,888 | 772 | (1,295) | (528) |
| Total Jamestown | \$ 8,212,547 | | \$ 153,052 | \$ 62,531 | \$ 104,589 | \$ 42,732 | \$ (48,463) | \$ (19,799) |
| Jamestown Unit 1 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 286,659 | 0.40855785 | \$ 5,819 | \$ 2,377 | \$ 3,526 | \$ 1,441 | \$ (2,293) | \$ (936) |
| 342.00 Fuel Holders and Accessories | 379,195 | 0.40855785 | 11,641 | 4,756 | 6,939 | 2,835 | (4,702) | (1,921) |
| 343.00 Prime Movers | 3,139,011 | 0.40855785 | 63,094 | 25,778 | 43,946 | 17,954 | (19,148) | (7,824) |
| 345.00 Accessory Electric Equipment | 155,272 | 0.40855785 | 2,826 | 1,155 | 1,724 | 704 | (1,102) | (451) |
| 346.00 Miscellaneous Power Plant Equipment | 85,462 | 0.40855785 | 3,188 | 1,302 | 1,889 | 772 | (1,299) | (530) |
| Total Jamestown Unit 1 | \$ 4,045,599 | | \$ 86,568 | \$ 35,368 | \$ 58,024 | \$ 23,706 | \$ (28,544) | \$ (11,662) |
| Jamestown Unit 2 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 24,853 | 0.40855785 | \$ 773 | \$ 316 | \$ 462 | \$ 189 | \$ (311) | \$ (127) |
| 342.00 Fuel Holders and Accessories | 36,769 | 0.40855785 | 518 | 212 | 320 | 131 | (198) | (81) |
| 343.00 Prime Movers | 4,029,805 | 0.40855785 | 62,059 | 25,355 | 43,925 | 17,946 | (18,134) | (7,409) |
| 345.00 Accessory Electric Equipment | 72,318 | 0.40855785 | 3,139 | 1,282 | 1,859 | 760 | (1,280) | (522) |
| 346.00 Miscellaneous Power Plant Equipment | 3,203 | 0.40855785 | (5) | (2) | (1) | | 4 | 2 |
| Total Jamestown Unit 2 | \$ 4,166,948 | | \$ 66,484 | \$ 27,163 | \$ 46,565 | \$ 19,026 | \$ (19,919) | \$ (8,137) |
| Lake Preston | | | | | | | | |
| 341.00 Structures and Improvements | \$ 279,726 | 0.40855785 | \$ 9,483 | \$ 3,874 | \$ 5,958 | \$ 2,434 | \$ (3,525) | \$ (1,440) |
| 342.00 Fuel Holders and Accessories | 328,705 | 0.40855785 | 5,818 | 2,377 | 3,517 | 1,437 | (2,301) | (940) |
| 343.00 Prime Movers | 3,477,302 | 0.40855785 | 55,289 | 22,589 | 44,857 | 18,327 | (10,432) | (4,262) |
| 345.00 Accessory Electric Equipment | 400,094 | 0.40855785 | 6,642 | 2,714 | 4,041 | 1,651 | (2,601) | (1,063) |
| 346.00 Miscellaneous Power Plant Equipment | 21,322 | 0.40855785 | 213 | 87 | 136 | 56 | (77) | (31) |
| Total Lake Preston | \$ 4,507,149 | | \$ 77,445 | \$ 31,641 | \$ 58,509 | \$ 23,905 | \$ (18,936) | \$ (7,736) |
| Solway Combustion Turbine | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,907,301 | 0.40855785 | \$ 158,506 | \$ 64,759 | \$ 161,941 | \$ 66,162 | \$ 3,435 | \$ 1,403 |
| 342.00 Fuel Holders and Accessories | 1,104,855 | 0.40855785 | 42,537 | 17,379 | 37,234 | 15,212 | (5,303) | (2,167) |
| 343.00 Prime Movers | 21,914,301 | 0.40855785 | 863,423 | 352,758 | 905,061 | 369,770 | 41,638 | 17,012 |
| 345.00 Accessory Electric Equipment | 1,310,193 | 0.40855785 | 41,795 | 17,076 | 41,664 | 17,022 | (131) | (54) |
| 346.00 Miscellaneous Power Plant Equipment | 318,649 | 0.40855785 | 11,025 | 4,504 | 10,962 | 4,479 | (63) | (25) |
| Total Solway Combustion Turbine | \$ 29,555,299 | | \$ 1,117,286 | \$ 456,476 | \$ 1,156,862 | \$ 472,645 | \$ 39,576 | \$ 16,169 |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | North Dakota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|--------------------------------------|------------------------|---------------------|------------------------|---------------------|--------------------|--------------------|
| | | | Total | North Dakota | Total | North Dakota | Total | North Dakota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| <u>Astoria Station Combustion Turbine</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 25,452,349 | 0.40855785 | \$ 771,206 | \$ 315,082 | \$ 771,206 | \$ 315,082 | \$ - | \$ - |
| 342.00 Fuel Holders and Accessories | 5,913,271 | 0.40855785 | 179,172 | 73,202 | 178,581 | 72,961 | (591) | (241) |
| 343.00 Prime Movers | 108,028,020 | 0.40855785 | 3,273,249 | 1,337,312 | 3,262,446 | 1,332,898 | (10,803) | (4,414) |
| 345.00 Accessory Electric Equipment | 7,391,588 | 0.40855785 | 223,965 | 91,503 | 223,226 | 91,201 | (739) | (302) |
| 346.00 Miscellaneous Power Plant Equipment | 1,478,318 | 0.40855785 | 44,793 | 18,301 | 44,645 | 18,240 | (148) | (61) |
| Total Astoria Station Combustion Turbine | \$ 148,263,546 | | \$ 4,492,385 | \$ 1,835,400 | \$ 4,480,104 | \$ 1,830,382 | \$ (12,281) | \$ (5,018) |
| <u>WIND PRODUCTION</u> | | | | | | | | |
| <u>Ashtabula</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 3,248,290 | 0.40899408 | \$ 85,755 | \$ 35,073 | \$ 85,755 | \$ 35,073 | \$ - | \$ - |
| 344.00 Generators | 105,926,168 | 0.40899408 | 2,923,562 | 1,195,720 | 2,987,118 | 1,221,714 | 63,556 | 25,994 |
| 345.00 Accessory Electric Equipment | 6,479,774 | 0.40899408 | 173,658 | 71,025 | 173,658 | 71,025 | | |
| 346.00 Miscellaneous Power Plant Equipment | 103,431 | 0.40899408 | 5,823 | 2,382 | 5,813 | 2,377 | (10) | (5) |
| Total Ashtabula | \$ 115,757,663 | | \$ 3,188,798 | \$ 1,304,200 | \$ 3,252,344 | \$ 1,330,189 | \$ 63,546 | \$ 25,989 |
| <u>Ashtabula III</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,027,787 | 0.40899408 | \$ 125,264 | \$ 51,232 | \$ 128,486 | \$ 52,550 | \$ 3,222 | \$ 1,318 |
| 344.00 Generators | 70,688,754 | 0.40899408 | 2,198,420 | 899,141 | 2,219,627 | 907,814 | 21,207 | 8,673 |
| 345.00 Accessory Electric Equipment | 7,024,753 | 0.40899408 | 218,470 | 89,353 | 221,982 | 90,789 | 3,512 | 1,436 |
| 346.00 Miscellaneous Power Plant Equipment | 222,806 | 0.40899408 | 6,929 | 2,834 | 8,088 | 3,308 | 1,159 | 474 |
| Total Ashtabula III | \$ 81,964,100 | | \$ 2,549,083 | \$ 1,042,560 | \$ 2,578,183 | \$ 1,054,461 | \$ 29,100 | \$ 11,901 |
| <u>Langdon</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,484,069 | 0.40899408 | \$ 65,579 | \$ 26,821 | \$ 65,579 | \$ 26,821 | \$ - | \$ - |
| 344.00 Generators | 69,539,883 | 0.40899408 | 1,940,163 | 793,515 | 1,961,025 | 802,048 | 20,862 | 8,533 |
| 345.00 Accessory Electric Equipment | 8,327,422 | 0.40899408 | 224,008 | 91,618 | 253,986 | 103,879 | 29,978 | 12,261 |
| 346.00 Miscellaneous Power Plant Equipment | 118,790 | 0.40899408 | 7,116 | 2,910 | 7,104 | 2,905 | (12) | (5) |
| Total Langdon | \$ 80,470,164 | | \$ 2,236,866 | \$ 914,864 | \$ 2,287,694 | \$ 935,653 | \$ 50,828 | \$ 20,789 |
| <u>Luverne</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,266,581 | 0.40899408 | \$ 64,371 | \$ 26,327 | \$ 64,598 | \$ 26,420 | \$ 227 | \$ 93 |
| 344.00 Generators | 67,158,480 | 0.40899408 | 2,061,765 | 843,250 | 2,135,640 | 873,464 | 73,875 | 30,214 |
| 345.00 Accessory Electric Equipment | 4,863,837 | 0.40899408 | 138,133 | 56,496 | 138,619 | 56,694 | 486 | 198 |
| 346.00 Miscellaneous Power Plant Equipment | 149,262 | 0.40899408 | 8,030 | 3,284 | 8,045 | 3,290 | 15 | 6 |
| Total Luverne | \$ 74,438,160 | | \$ 2,272,299 | \$ 929,357 | \$ 2,346,902 | \$ 959,868 | \$ 74,603 | \$ 30,511 |
| <u>Merricourt</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 7,960,903 | 0.40899408 | \$ 261,118 | \$ 106,796 | \$ 261,118 | \$ 106,796 | \$ - | \$ - |
| 344.00 Generators | 234,615,570 | 0.40899408 | 7,695,391 | 3,147,369 | 7,671,929 | 3,137,774 | (23,462) | (9,595) |
| 345.00 Accessory Electric Equipment | 18,247,878 | 0.40899408 | 598,530 | 244,795 | 596,706 | 244,049 | (1,824) | (746) |
| 346.00 Miscellaneous Power Plant Equipment | 59,264 | 0.40899408 | 2,039 | 834 | 2,104 | 861 | 65 | 27 |
| Total Merricourt | \$ 260,883,615 | | \$ 8,557,078 | \$ 3,499,794 | \$ 8,531,857 | \$ 3,489,480 | \$ (25,221) | \$ (10,314) |

OTTER TAIL POWER COMPANY

Statement B

Comparison of Current and Updated Accruals

Current: VG Procedure / RL Technique

Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | North Dakota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|--------------------------------------|------------------------|-----------------|------------------------|-----------------|-------------------|----------------|
| | | | Total | North Dakota | Total | North Dakota | Total | North Dakota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| SOLAR PRODUCTION | | | | | | | | |
| <u>Jamestown</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 17,105 | 0.40899408 | \$ 708 | \$ 290 | \$ 705 | \$ 288 | \$ (3) | \$ (2) |
| 345.00 Accessory Electric Equipment | 151,476 | 0.40899408 | 6,271 | 2,565 | 6,241 | 2,553 | (30) | (12) |
| Total Jamestown | \$ 168,581 | | \$ 6,979 | \$ 2,855 | \$ 6,946 | \$ 2,841 | \$ (33) | \$ (14) |
| <u>Hoot Lake</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,837,841 | - | \$ 59,178 | \$ - | \$ 62,303 | \$ - | \$ 3,125 | \$ - |
| 345.00 Accessory Electric Equipment | 56,973,080 | - | 1,834,533 | | 1,931,387 | | 96,854 | |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | - | 19,726 | | 20,768 | | 1,042 | |
| Total Hoot Lake | \$ 59,423,535 | | \$ 1,913,437 | \$ - | \$ 2,014,458 | \$ - | \$ 101,021 | \$ - |
| <u>Rush Lake</u> | | | | | | | | |
| 341.00 Structures and Improvements | \$ 13,536 | 0.40899408 | \$ 573 | \$ 234 | \$ 570 | \$ 233 | \$ (3) | \$ (1) |
| 345.00 Accessory Electric Equipment | 142,586 | 0.40899408 | 6,031 | 2,467 | 6,003 | 2,455 | (28) | (12) |
| Total Rush Lake | \$ 156,122 | | \$ 6,604 | \$ 2,701 | \$ 6,573 | \$ 2,688 | \$ (31) | \$ (13) |

Minnesota Public Utilities
Commission Order
Dated March 4, 2025

Docket No. E017/D-24-302

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Katie J. Sieben
Hwikwon Ham
Audrey C. Partridge
Joseph K. Sullivan
John A. Tuma

Chair
Commissioner
Commissioner
Commissioner
Commissioner

In the Matter of Otter Tail Power Co.'s Petition
for Approval of its 2024 Annual Review of
Depreciation Certification

SERVICE DATE: March 4, 2025

DOCKET NO. E-017/D-24-302

The above-entitled matter has been considered by the Commission and the following disposition made:

- 1. Approved Otter Tail Power Co.'s (Otter Tail) Petition, including depreciation rates for the Jamestown and Lake Preston peaking units that appropriately reflect an anticipated year of final retirement of 2033.**
- 2. Required Otter Tail to make a compliance filing within 30 days of the date of the Commission's order with updated depreciation rates for the Jamestown and Lake Preston peaking units.**

This decision is issued by the Commission's consent calendar subcommittee, under a delegation of authority granted under Minn. Stat. § 216A.03, subd. 8 (a). Unless a party, a participant, or a Commissioner files an objection to this decision within ten days of receiving it, it will become the Order of the full Commission under Minn. Stat. § 216A.03, subd. 8 (b).

The Commission agrees with and adopts the recommendations of the Department of Commerce, which are attached and hereby incorporated into the Order.



BY ORDER OF THE COMMISSION

A handwritten signature in black ink, appearing to read "Will Seuffert".

Will Seuffert
Executive Secretary

To request this document in another format such as large print or audio, call 651.296.0406 (voice). Persons with a hearing or speech impairment may call using their preferred Telecommunications Relay Service or email consumer.puc@state.mn.us for assistance.

December 2, 2024

PUBLIC DOCUMENT

Will Seuffert
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, Minnesota 55101-2147

RE: **PUBLIC** Comments of the Minnesota Department of Commerce
Docket No. E017/D-24-302

Dear Mr. Seuffert:

Attached are the **PUBLIC** comments of the Minnesota Department of Commerce (Department) in the following matter:

*Petition of Otter Tail Power Company for Approval of 2024 Annual Review
of Depreciation Certification.*

The Petition was filed by Otter Tail Power Company on August 30, 2024.

The Department recommends **approval, with modifications**, and is available to answer any questions the Minnesota Public Utilities Commission may have.

Sincerely,

/s/ Peter Wyckoff, Ph.D.
Deputy Commissioner, Division of Energy Resources

JT/CA/ar
Attachment



Before the Minnesota Public Utilities Commission

PUBLIC Comments of the Minnesota Department of Commerce

Docket No. E017/D-24-302

I. INTRODUCTION

On August 30, 2024, Otter Tail Power Company (Otter Tail, OTP, or the Company) filed its 2024 Annual Review of Depreciation Certification (Petition) with the Minnesota Public Utilities Commission (Commission) in Docket No. E017/D-24-302. The Company proposed to extend the remaining lives of its Jamestown and Lake Preston peaking units, as well as its Hoot Lake Ash Landfill. The depreciation rates for all other accounts proposed in the Petition are based on the service life and salvage parameters established in the Company's most recent comprehensive depreciation study (Docket No. E017/D-23-393) but have been updated to reflect the passage of one year's time and 2023 plant activity (*e.g.*, additions and retirements).

The Company requests an effective date of January 1, 2025, for its proposed depreciation parameters. Otter Tail estimated its proposed depreciation rates would increase its 2025 annual depreciation expense by \$425,546 (or 0.03 percent) on a total-company basis, or \$258,103 for the Minnesota jurisdiction, relative to its currently approved depreciation rates.

II. PROCEDURAL BACKGROUND

| | |
|-------------------|--|
| November 28, 2023 | The Commission approved Otter Tail's last five-year comprehensive depreciation filing on November 28, 2023, in Docket No. E017/D-23-393. Otter Tail's next five-year comprehensive depreciation filing is due September 1, 2028. |
| August 30, 2024 | Otter Tail Power Company filed a petition for approval of its 2024 Annual Review of Depreciation Certification. |

III. DEPARTMENT ANALYSIS

A. DEPRECIATION BACKGROUND

For utility rate regulation purposes, depreciation accounting is a process of allocation, not of valuation, whose goal is to distribute the cost of capital assets, less net salvage, over the useful life in a systematic and rational manner.¹

A depreciation system combines three elements that determine the depreciation rate: a method, a procedure, and a technique. The method determines how the asset, or group of assets will depreciate over time. For example, under the straight-line (SL) method, an asset is depreciated equally over its probable service life,² or the period of time extending from the date of the asset's initial installation to the forecasted date when it will be retired from service.³ The procedure determines the level of grouping or sub-grouping of the assets. For example, in a vintage group (VG) procedure, property similar in characteristics and placed in service during the same year is treated as a distinct group that is depreciated as a whole. The depreciation technique is an additional aspect of the depreciation process. It informs the measure of the asset's service life the company uses to calculate the depreciation rate. Utilities may choose to apply an average service life (ASL) or remaining life (RL) technique.

When utilities use the ASL technique to depreciate group property, the life and salvage factors, as well as the resulting depreciation rates, remain unchanged between studies. For companies using the remaining life (RL) technique to determine the depreciable (useful) lives of their capital assets, depreciation rates must be updated annually to reflect the passage of time and the impact of plant activity, such as capital improvements or retirements on remaining lives.

B. STATUTORY AND RULE REQUIREMENTS

Minn. Stat. § 216B.11 (2023) and Minn. R. 7825.0500-7825.0900 (2023) require public utilities to seek Commission approval of their depreciation rates and methods. Utilities must file comprehensive depreciation studies at least once every five years. Once certified by Commission order, utility depreciation rates remain in effect until the next certification. The utilities' petitions address the underlying parameters used to calculate depreciation accrual rates in the comprehensive depreciation studies.⁴ The Commission approved Otter Tail's last comprehensive depreciation filing on November 28, 2023, in Docket No. E017/D-23-393. Otter Tail's next comprehensive depreciation filing is due September 1, 2028.⁵

¹ Minn. R. 7825.0500 subp. 7 (2023)

² Minn. R. 7825.0500 subp. 14 (2023).

³ Minn. R. 7825.0500 subp. 10 (2023).

⁴ Minn. R. 7825.0600 see Subp. 2. D.

⁵ See Petition, p. 3

Analyst(s) assigned: Justin Taylor and Craig Addonizio

In addition to the comprehensive studies, Minn. R. 7825.0600 subp. 2.D (2023) requires utilities to review their depreciation rates annually to determine if they are still generally appropriate. The Company's Petition is an annual update to its most recent comprehensive study, and thus satisfies this requirement.

Minn. R. 7825.0800 (2023) requires the use of straight-line depreciation unless the utility can justify a different method, but does not prescribe specific depreciation procedures or techniques.⁶ For most of its property accounts, Otter Tail uses the Straight Line-Vintage Group-Remaining Life technique and therefore files annual updates to reflect the passage of time and plant activity. For a small number of accounts noted in the Petition, the Company uses amortization accounting, which is also a straight-line method. The Department concludes the Company's Petition satisfies this requirement.

Minn. R. 7825.0700 requires utilities to list any major future additions or retirements that the utility believes may have an impact on the current study. Attachment 3 of the Company's Petition states:

Because Otter Tail Power Company (Otter Tail) files prospective depreciation certification filings, it is unaware of any additional major future additions or retirements that will materially affect this filing's certification results. Future year major additions or retirements will affect future depreciation certification results, historic additions and retirements primarily affect this filing's depreciation certification results due to the look back, or historic review back to books dated December 31st of the prior year.

While the Company states it is unaware of additional major future additions or retirements impacting the current Petition, Otter Tail does discuss projects potentially impacting future depreciation filings. These are listed below.

- OTP is working on wind repowering projects at its four General Electric (GE) wind farms. These investments were approved by the Commission in the Minnesota Resource Cost Recovery Rider in Docket No. E017/M-23-496.
- OTP is working on implementing its Advanced Metering Infrastructure (AMI) functionality, an outage management system, and demand response system. The costs were approved by the Commission in the Electric Utility Infrastructure Cost (EUIC) rider in Docket No. E017/M-21-382.
- Otter Tail is continuing to invest in Transmission, Distribution, and Solar applications. In addition, the Company is working on implementing a wind repowering project for some of its older wind farms and is also exploring participation in MISO long-range transmission planning projects.

⁶ Minn. R. 7825.0800 (2023).

Analyst(s) assigned: Justin Taylor and Craig Addonizio

Based on the information provided and the depreciation technique used, the Department concludes OTP's Petition meets Minn. Stat. § 216B.11 and Minn. R. 7825.0500-7825.0900 (2023).

C. COMPLIANCE WITH PRIOR COMMISSION ORDERS

C.1. Comparison of Retirement Estimates to Integrated Resource Plan (IRP)

In a prior depreciation proceeding, the Commission stated in its order:

The Company shall include a comparison of the retirement estimates used in its most current Integrated Resource Plan (IRP) to remaining lives used in its depreciation filing and explain any differences.⁷

Attachment 4 of OTP's Petition is a comparison of the retirement date estimates used in the Company's most recent IRP and the retirement date estimates the Company uses to calculate its proposed depreciation rates in its Petition. The Department reviewed Attachment 4 and concludes that the Company reasonably explained all significant differences between its IRP and depreciation retirement assumptions.

D. OTTER TAIL POWER COMPANY'S PROPOSAL

The Department examined the Petition for reasonableness of the proposed changes to remaining lives, salvage values, and resulting depreciation rates. Otter Tail's technical update was completed by Foster Associates Consultants, LLC using the parameters developed in the Company's last comprehensive depreciation study, except as otherwise noted. The Department discusses Otter Tail's Petition below.

Table 1 below summarizes the depreciation rate changes by plant type at the Total Company and Minnesota jurisdictional levels.

⁷ *In the Matter of Otter Tail Power Company's Petition for Approval of its 2018 Five-Year Review of Depreciation Certification*, Minnesota Public Utilities Commission, ORDER APPROVING PETITION AND SETTING ADDITIONAL REQUIREMENTS, July 17, 2019, Docket No. E017/D-18-568, (eDockets) [20197-154443-01](#), at 7.

Table 1: Otter Tail Power Company’s 2025 Proposed Rate Changes⁸

| Accrual Rates | | | | 2025 Annualized Accrual | | | | | |
|----------------------|--------------|--------------|--------------|-------------------------|-------------------|---------------------|-------------------|-------------------|---------------------|
| Function | Current Rate | Update Rate | Rate Change | Total Company | Total Company | Total Co. \$ Change | Minnesota | Minnesota | Minnesota \$ Change |
| | | | | Current \$ Amount | Updated \$ Amount | | Current \$ Amount | Updated \$ Amount | |
| A | B | C | D=C-B | E | F | G=F-E | H | I | J=I-H |
| Intangible Plant | 11.79% | 11.79% | 0.00% | 4,291,603 | 4,291,603 | - | 2,051,875 | 2,051,875 | - |
| Steam Production | 2.79% | 2.79% | 0.00% | 14,858,567 | 14,869,235 | 10,668 | 7,393,854 | 7,399,164 | 5,310 |
| Hydraulic Production | 1.27% | 1.50% | 0.23% | 146,337 | 173,174 | 26,837 | 72,817 | 86,174 | 13,357 |
| Other Production | 3.06% | 3.04% | -0.02% | 5,840,168 | 5,800,064 | (40,104) | 2,906,161 | 2,886,204 | (19,957) |
| Wind Production | 3.07% | 3.10% | 0.03% | 18,804,124 | 18,996,980 | 192,856 | 9,351,037 | 9,446,941 | 95,904 |
| Solar Production | 3.22% | 3.40% | 0.18% | 1,927,020 | 2,027,977 | 100,957 | 1,920,191 | 2,021,181 | 100,990 |
| Transmission | 1.54% | 1.54% | 0.00% | 11,606,178 | 11,640,482 | 34,304 | 6,045,056 | 6,062,922 | 17,866 |
| Distribution | 2.44% | 2.46% | 0.02% | 15,960,815 | 16,049,876 | 89,061 | 7,059,321 | 7,098,710 | 39,389 |
| General Plant | 4.89% | 4.90% | 0.01% | 3,341,971 | 3,352,938 | 10,967 | 1,597,839 | 1,603,083 | 5,244 |
| Total Utility | 2.62% | 2.65% | 0.03% | 76,776,783 | 77,202,329 | 425,546 | 38,398,151 | 38,656,254 | 258,103 |

D.1. Reasonableness of Proposed Depreciation Lives, Salvage Rates and Accrual Rates

For most accounts, Otter Tail has proposed no changes other than passage-of-time adjustments, and changes resulting from addition and retirement activity. For such accounts, the Department concludes that Otter Tail’s proposed depreciation parameters and rates are reasonable.

For certain production facilities, the Company proposed more significant changes, which the Department discusses below.

D.1.1. Jamestown and Lake Preston Peaking Units Remaining Life

Otter Tail requested to extend the lives of its Jamestown and Lake Preston peaking units by seven years, changing the assumed retirement year for these units from 2033 to 2040. The requested life extension is based on the results of an engineering study the Company commissioned to evaluate the units’ long-term serviceability. In its Petition, the Company stated “[t]he study concluded that Otter Tail should be able to operate the units for the foreseeable future and would not put a finite life on these assets.”

⁸ OTP Petition Attachment 1, p. 4 of 48, and Statement B.

Analyst(s) assigned: Justin Taylor and Craig Addonizio

However, the Department notes that the engineering study's conclusion that the units could be operated indefinitely was **[TRADE SECRET DATA HAS BEEN EXCISED]**.^{9 10}

Because Otter Tail has **[TRADE SECRET DATA HAS BEEN EXCISED]**.

The Department notes that life extensions for generating units can also be justified by significant, life-extending capital investments, and/or a conclusion in an integrated resource plan that supports the continued operation of a plant beyond the end of its current depreciation life. Otter Tail's three peaking units have not received any significant capital investments in the past several years, and its recently-completed integrated resource plan assumed the units retire in 2033 and did not evaluate the possibility of operation past that date.

For these reasons, the Department recommends that the Commission deny Otter Tail's request to extend the anticipated year of final retirement (AYFR) for its Jamestown and Lake Preston peaking units and recommends instead that the Commission approve the current AFYR of 2033.

D.1.2. Hoot Lake Plant Ash Landfill

In Docket E017/D-16-729, the Commission allowed Otter Tail to transfer plant and reserve balances associated with Hoot Lake's Ash ponds into a newly created plant account, 312.1 Boiler Equipment – Ash Ponds, and set a remaining life for this newly created account of approximately 34 years. This remaining life reflected the roughly 4-year remaining life of the Hoot Lake Plant at the time, plus a required 30-year monitoring period for the ash pond beginning when the ash pond was capped. The 34-year remaining life was set assuming the ash pond would be capped very quickly following shutdown of Hoot Lake in 2021.

However, the final ash landfill capping process was not completed, and therefore the 30-year post-closure monitoring period did not begin, until January 2024, or approximately three years later than originally anticipated. Otter Tail proposed in its Petition to extend the life of account 312.1 to reflect this delay and align the remaining life with the 30-year monitoring period. The Company requested to set the account's Average Year of Final Retirement to 2054 (2024 plus 30 years), which is an increase in three years from 2051 (2021 plus 30 years).

Statement B of Otter Tail's Petition indicates a reduction in annual depreciation expense of \$110,880 (OTP Total) / \$55,176 (OTP MN) for 312.1 Boiler Equipment – Ash Ponds. However, much of this decrease is the result of the transfer of \$2.8 million into account 312.1's depreciation reserve. The transferred reserves are excess depreciation reserves remaining in other Hoot Lake Plant property accounts after decommissioning of the recently-retired plant was completed. The Department

⁹ See Attachment 1 (response to DOC IR 1 w/attachment)

¹⁰ See Attachment 2 (response to DOC IR 4)

Analyst(s) assigned: Justin Taylor and Craig Addonizio

estimates that of the \$55,176 reduction in MN-jurisdictional depreciation expense, less than \$8,000 is attributable to the proposed life extension. The remainder is the result of this significant increase in account 312.1's depreciation reserve.

Based in large part on the small effect the proposed life extension will have on the account's annual depreciation expense, the Department concludes that Otter Tail's proposal is reasonable.

D.1.3. Coyote Station

In the Company's most recent integrated resource plan,¹¹ the Commission ordered Otter Tail to:

...commence activities to remove all jurisdictional allocations to its Minnesota ratepayers for Coyote Station, such that it will no longer serve Minnesota customers, either through a sale, jurisdictional realignment or other means that ends all Minnesota ratepayer obligations for the plant, coal contracts and associated facilities as soon as feasible but no later than December 31, 2031. ... Regardless of a sale, jurisdictional realignment, or other arrangement, Otter Tail will no longer utilize Coyote Station to serve Minnesota customers beyond December 31, 2031.¹²

In addition, the Commission ordered that the Minnesota share of certain Coyote Station costs, including a return of and on rate base, incurred after June 1, 2031, cannot be recovered from Minnesota ratepayers unless Otter Tail proves such costs will be reasonable and prudent in a future proceeding.¹³

In its Petition, the Company described its proposal for depreciation and cost recovery for Coyote Station in the 2021 IRP Docket. The Company proposed to place Coyote Station's undepreciated plant balance into a regulatory asset, and amortize it over a schedule that reflects, at one extreme, the plant's current anticipated year of final retirement (2041), or, at the other extreme an estimated withdrawal date (2031, or perhaps earlier), or some time in between. The Commission did not make any final decisions related to depreciation or cost recovery in the 2021 IRP Docket.

In its Petition, Otter Tail proposed to leave the depreciation life for Coyote Station unchanged at this time, reflecting an AFYR of 2041. The Company stated that there are many issues to be resolved for Coyote Station, some of which may be addressed in the ongoing Commission Inquiry into the

¹¹ *In the Matter of Otter Tail Power's 2023–2037 Integrated Resource Plan*, Docket No. E017/RP-21-339 (hereinafter "2021 IRP Docket").

¹² *In the Matter of Otter Tail Power's 2023–2037 Integrated Resource Plan*, Minnesota Public Utilities Commission, ORDER MODIFYING OTTER TAIL POWER'S 2023–2037 INTEGRATED RESOURCE PLAN; July 22, 2024, Docket No. E017/RP-21-339, (eDockets) [20247-208805-01](#) at Order Point 4.

¹³ *Id.* at Order Point 3.

Analyst(s) assigned: Justin Taylor and Craig Addonizio

Ratemaking Treatment for Early Retiring Generating Facilities Owned by Regulated Electric Utilities.¹⁴ Additionally, the Company noted that the manner in which it disposes of its Minnesota portion of Coyote Station will likely also be a relevant factor.

Coyote Station's circumstances are arguably more complex than those of a plant that is known to be retiring early (or earlier than initially planned), because it is not clear that Coyote will actually retire in 2031. Otter Tail co-owns Coyote Station with three other owners for whom the plant remains a key baseload resource.¹⁵ The Department understands that Otter Tail is currently reviewing its various options for, including but not limited to selling its Minnesota-jurisdictional share of the plant, or assigning that share to the other jurisdictions in which the Company operates.

Because of the uncertainty around the fate of Coyote Station, it may not be reasonable to set Coyote Station's AYFR to 2031. If the plant's annual jurisdictional depreciation expense is increased in order to achieve full depreciation by 2031, and then Otter Tail is able to sell the Minnesota portion and recoup a significant portion of the plant's gross plant costs, then depreciation expense in the interim would have been too high, negatively impacting the Company and ratepayers. However, if depreciation expense is left unchanged, and Otter Tail is forced to dispose of the plant without selling its share, or selling at a steep discount, the remaining undepreciated plant will have to be addressed in some way.

Setting Coyote Station's AYFR in between 2031 and 2041 may reasonably balance the competing impacts of accelerated depreciation as it would lessen the immediate increase in depreciation expense and also better align depreciation expense with the ratepayers who will actually benefit from the plant's operations, thus avoiding unnecessary intergenerational equity.

For context, in its Petition, Otter Tail calculated and compared annual depreciation expense for Coyote Station based on AFYR's of 2041 and 2031 to illustrate the potential impact of shortening the plant's life. Otter Tail estimated that on a total-company basis, doing so would increase its annual depreciation expense by \$5.1 million. The Department estimated the impact on Minnesota-jurisdictional depreciation expense would be approximately \$2.5 million per year.

¹⁴ *In the Matter of a Commission Inquiry into the Ratemaking Treatment for Early Retiring Generating Facilities Owned by Regulated Electric Utilities*, Docket No. E-002, E-015, E017/CI-23-375 (hereinafter "Early Retirement Investigation").

¹⁵ *In the Matter of Otter Tail Power's 2023– 2037 Integrated Resource Plan*, Otter Tail Power Company, Application for Supplemental Resource Plant Approval, Mar. 31 2023, Docket No. E017/RP-21-339, (eDockets) [20233-194373-03](#) at 13.

Table 2
Coyote Station Annual Depreciation Expense
2041 AFYR versus 2031 AYFR¹⁶

| Account | Annual Depreciation Expense | | | | | |
|--------------|-----------------------------|------------------|------------------|------------------|------------------|------------------|
| | OTP Total | | | OTP MN* | | |
| | 2041 AFYR | 2031 AFYR | Increase | 2041 AFYR | 2031 AFYR | Increase |
| 311.00 | 588,073 | 1,270,657 | 682,584 | 292,634 | 632,299 | 339,664 |
| 312.00 | 2,611,083 | 5,748,680 | 3,137,597 | 1,299,316 | 2,860,633 | 1,561,317 |
| 314.00 | 752,214 | 1,669,548 | 917,334 | 374,313 | 830,793 | 456,480 |
| 315.00 | 219,332 | 477,656 | 258,324 | 109,143 | 237,689 | 128,546 |
| 316.00 | 88,492 | 198,077 | 109,585 | 44,035 | 98,566 | 54,531 |
| Total | 4,259,194 | 9,364,618 | 5,105,424 | 2,119,441 | 4,659,980 | 2,540,539 |

* Calculated with Coyote Station allocation factor used in Petition, Statement B

Because of the uncertainty surrounding the future of Coyote Station and the uncertainty surrounding the outcome of the Commission's Early Retirement Investigation, the Department agrees that, at this time, it is reasonable to leave Coyote Station's AYFR at 2041. However, the Department notes that the longer Coyote Station's AYFR is not adjusted to reflect the Commission's 2021 IRP Order, the more difficult implementing accelerated depreciation will become, thus limiting the Commission's options related to cost recovery for this plant. Therefore, the Department expects to address Coyote Station's depreciation life again in the near term as the plant's future is clarified through Otter Tail's planning pursuant to the 2021 IRP Order, and potentially with additional insight from the Early Retirement Investigation.

D.1.4. Legacy Coal Combustion Residuals (CCR) Compliance

Otter Tail is currently in the process of assessing compliance obligations under the Legacy Coal Combustion Residuals (Legacy CCR) Rule which was first published in the Federal Register on May 8, 2024 (89 FR 38950).¹⁷ The Company has identified potential CCR Management Unit sites at the Big Stone Plant, and additional subsurface investigation for certain areas is being planned. Otter Tail stated they will not have cost estimates for Big Stone available until Facility Evaluation Reports have been completed, estimated to be due in February 2026 and February 2027. Additionally, Otter Tail is still investigating extent and quantity of CCR at all sites, as well as other relevant characteristics. The Department concludes there are no tangible costs available to analyze in this depreciation study at this time.

¹⁶ Petition, page 8.

¹⁷ See Attachment 3 (response to DOC IR 7)

Analyst(s) assigned: Justin Taylor and Craig Addonizio

E. REASONABLENESS OF THE PROPOSED ANNUAL ACCRUAL RATES

Otter Tail generally determines its primary life and net salvage parameters in its comprehensive depreciation studies. In the annual technical updates, Otter Tail adjusts its annual accrual rates based on changes to remaining lives and net salvage rates resulting from the passage of time and plant activity, as well as changes to depreciation reserves. In this Petition, which is an annual technical update, the only exceptions to this practice are the proposed life extensions for the Jamestown and Lake Preston Peaking units, and the Hoot Lake Ash Landfill.

As discussed above, the Department recommends that the Commission deny Otter Tail's request to extend the lives of the Jamestown and Lake Preston peaking units, and instead retain the current AFYR of 2033. The Department concludes that all other proposed depreciation parameters and rates are reasonable, and recommends that the Commission approve them.

F. RESERVE REBALANCING

On January 7, 2012 in Docket No. E017/D-11-866, the Commission issued an order discontinuing Otter Tail's practice of rebalancing its depreciation reserves. In the instant docket, Otter Tail complied with this order and did not request to rebalance its reserves.

IV. DEPARTMENT RECOMMENDATIONS

Based on its analysis, described above, the Department concludes that Otter Tail's Petition satisfies all filing requirements and that the proposed depreciation parameters and rates are reasonable, with the exception of those proposed for the Company's Jamestown and Lake Preston peaking units. For those units, the Department recommends that the Commission approve the current anticipated year of final retirement for those units of 2033, as well as depreciation rates that appropriately reflect that AYFR.

The Department recommends that the Commission:

1. Approve Otter Tail's Petition, with the exception of the depreciation rates proposed for the Jamestown and Lake Preston peaking units;
2. Approve depreciation rates for the Jamestown and Lake Preston peaking units that appropriately reflect an anticipated year of final retirement of 2033; and
3. Require Otter Tail to make a compliance filing within 30 days of the date of the Commission's Order with updated depreciation rates for the Jamestown and Lake Preston peaking units.

ATTACHMENTS

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OTTER TAIL POWER COMPANY
Docket No: E017-D-24-302

Response to: MN Department of Commerce

Analyst: Craig Addonizio - Justin Taylor

Date Received: September 25, 2024

Date Due: October 07, 2024

Date of Response: October 07, 2024

Responding Witnesses: Cary Stephenson, Associate General Counsel - (218)739-8956;
Loyal Demmer, Senior Depreciation Accountant - (218)739-8659

Information Request:

- a. Please provide complete copies of all work products produced by IEM Energy Consultants, LLC pursuant to its evaluation of the Jamestown and Lake Preston peaking units' long-term serviceability.
- b. Please confirm that, in Otter Tail's most recent resource plan, the Jamestown and Lake Preston peaking units were assumed to retire in 2033 (as per Appendix F of the Company's March 31, 2023 Supplemental Resource Plan filing). If the units' assumed retirement date(s) were something different, please provide a cite to the document(s) in which the different retirement dates were discussed.
- c. Please explain why it would be reasonable to extend the lives of these units without any notable, life-extending capital investments, or any support from an approved resource plan demonstrating that their continued operation, past their assumed retirement dates, would be reasonable and provide any additional documentation and/or comments to support the request for increased oil peaker life extensions.

Attachments: 1

Attachment 1 to IR MN-DOC-001_PUBLIC

Response:

Attachment 1 contains an analysis prepared by consultants, portions of which are subject to a non-disclosure agreement (the "Protected Data"). In addition, the report contains information that if disclosed could give vendors and suppliers a competitive advantage to the detriment of Otter Tail's customer. The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

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- a. Please see Attachment 1 to IR MN-DOC-001 for IEM Energy Consultants, Otter Tail Power Company Peaker Fleet Study 2023, long-term operational assessment of OTP's fleet of three General Electric Frame 5 gas turbines.
- b. Otter Tail confirms that its most recent IRP (Docket No. E017/RP-21-339) filed in September 2021 and supplemented in March 2023 assumed a 2033 retirement date for the Jamestown and Lake Preston peaking units. The proposed retirement dates for the Jamestown and Lake Preston peaking units in this depreciation docket are based on Otter Tail's assessment of the March 25, 2024, IEM Energy Consultants report referenced above as Attachment 1. The timing of the report and Otter Tail's subsequent assessment of the report's conclusion and recommendations precluded inclusion of revised retirement dates in the IRP docket.

Beyond the foregoing, it has been Otter Tail's experience that annual depreciation filings are the appropriate regulatory mechanism for requesting plant in service life extensions. These filings directly drive the financial transactions associated with the remaining life of assets and bring plant parameters in line to set baseline expectations for future rate proceedings and resource plan filings. Thus, the GE Frame 5 peaking unit service life extensions and the rationale for those extensions is best presented in this filing.

- c. In addition to routine capital investments, Otter Tail has made life extending capital improvements at the GE Frame 5 peaking units including Control System upgrades, Automated Turbine Fogging System upgrades, and Ovation Server Upgrades. However, the primary finding from the IEM Energy Consultants LLC study in support of Otter Tail's service life extension request for these peaking units was not life extending capital investments; the rationale for the extension was primarily the low service hours the units have experienced.

The historic deployment of these peaking units has been limited to runtime dispatching in only the most extreme energy demand scenarios. Since these high energy demand scenarios occur on an intermittent bases and often only seasonally and at peak incident events, the units do not see a lot of continuous routine runtime hours. Please refer to the following data on this point:

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| | JAMESTOWN PEAKING PLANT UNIT 1 | | | | JAMESTOWN PEAKING PLANT UNIT 2 | | | | LAKE PRESTON PEAKING PLANT UNIT | | |
|------|-----------------------------------|----------------|--------------------|------|-----------------------------------|----------------|--------------------|------|------------------------------------|----------------|--------------------|
| | FIRED STARTS | FIRED HOURS | Ave Hrs / Start | | FIRED STARTS | FIRED HOURS | Ave Hrs / Start | | FIRED STARTS | FIRED HOURS | Ave Hrs / Start |
| 2023 | 17 | 48.1 | 2.8 | 2023 | 19 | 49.7 | 2.6 | 2023 | 14 | 14.1 | 1.0 |
| 2022 | 21 | 76.3 | 3.6 | 2022 | 17 | 52.2 | 3.1 | 2022 | 10 | 30.6 | 3.1 |
| 2021 | 15 | 100.2 | 6.7 | 2021 | 17 | 91.1 | 5.4 | 2021 | 21 | 122.1 | 5.8 |
| 2020 | 14 | 26.2 | 1.9 | 2020 | 9 | 18.3 | 2.0 | 2020 | 13 | 27.0 | 2.1 |
| 2019 | 9 | 44.8 | 5.0 | 2019 | 7 | 42.0 | 6.0 | 2019 | 12 | 48.1 | 4.0 |
| 2018 | 14 | 19.6 | 1.4 | 2018 | 9 | 22.6 | 2.5 | 2018 | 15 | 53.9 | 3.6 |
| 2017 | 15 | 32.0 | 2.1 | 2017 | 14 | 37.1 | 2.7 | 2017 | 19 | 46.7 | 2.5 |

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To: Michael J Olson, Ottertail Power Company
From: Jeff Fassett, IEM Energy Consultants, LLC *Jeffrey J. Fassett*
Cc: Rob Shepard, IEM Energy Consultants, LLC
Enrique Guarin, IEM Energy Consultants, LLC
Date: March 25, 2024
Subject: Otter Tail Power Company Peaker Fleet Study 2023 – Final

Introduction: IEM Energy Consultants, LLC, (“IEM”), was commissioned by Otter Tail Power Company (“OTPCO”) to provide a long-term operational assessment of their fleet of General Electric (“GE”), Frame 5 gas turbines, (the “Units”). The peaker fleet is comprised of two (2) sites and three (3) Units. It is important to note that projections for operational integrity of fossil fueled generation assets are highly dependent on energy policy and future demand, (both of which are beyond the scope of this evaluation). It can be stated that in the move towards renewable energy, regional system operators such as MISO have realized that firm capacity, dispatchable generation is still very critical to the overall reliability of the electrical grid and have reversed or slowed the drive to retire such assets. It should also be noted that as the economy is increasingly becoming more digital, energy intensive data centers will drive a demand that cannot be reliably met by non-dispatchable resources.

IEM has made the following assumptions in support of our review:

- Unit data provided by OTPCO demonstrates accurate or over-reporting of unit Starts and Hours.
- Generator operation and maintenance have been reported as excellent and are expected to continue. Periodic generator tests are consistently good, as a result, the probability of a generator-related forced outage will be considered low.
- Given the low forced outage rates, all units are in good operating condition for the baseline purposes of this analysis.
- Preventive maintenance continues to be completed regularly. Special attention should be given to critical components.
- Condition monitoring and alarms adequately identify developing problems.
- All heaters for the generator and GT compartments are verified operational frequently.
- OTPCO continues to perform IEM-recommended Borescope Inspections.
- Borescope Inspection results will drive major maintenance.
- OTPCO verifies and maintains records of maintenance, Starts and Hours.

This report must be viewed as a static snapshot of the most likely scenarios for the continued reliable operation of the Units for the foreseeable future and should be revisited on a regular basis. IEM’s assessment is based on our knowledge of the Units including maintenance histories, current hours/starts and projected operating profile, coupled with our knowledge of similar units in the industry and the current state of the original equipment manufacturers, (“OEM’s”), and non-OEM support infrastructure. IEM conducted a site visit as part of this review. By way of this memo, IEM would like to present our findings and recommendations.

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OTTER TAIL POWER COMPANY
Docket No: E017-D-24-302

Response to: MN Department of Commerce
Analyst: Craig Addonizio - Justin Taylor
Date Received: October 14, 2024
Date Due: October 24, 2024
Date of Response: October 24, 2024
Responding Witness: Loyal Demmer, Senior Depreciation Accountant - 218 739-8659

Information Request:

On page 5 of its Petition, Otter Tail stated that the engineering study it commissioned for its peaking units concluded that “Otter Tail should be able to operate the units for the foreseeable future and would not put a finite life on these assets.” However, the engineering study [TRADE SECRET BEGINS

TRADE SECRET ENDS].

Attachments: 0

Response:

The information marked below refers to information set forth in an analysis prepared by consultants, portions of which are subject to a non-disclosure agreement (the “Protected Data”). In addition, the report contains confidential pricing projections that if disclosed could give vendors and suppliers a competitive advantage to the detriment of Otter Tail’s customers (the “Protected Data”). The Protected Data has economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons and is subject to the efforts by OTP to protect the information from public disclosure. The Protected Data therefore: (1) constitutes trade secret information, as defined in Minn. Stat. § 13.37, subd. 1(b); (2) is classified as nonpublic data pursuant to Minn. Stat. § 13.37, subd. 2; (3) is also not

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public data, as defined in Minn. Stat. § 13.02, subd. 8a; and (4) is protected data under Minn. R. 7829.0100, subp. 19a(A).

Otter Tail Power only recently received its engineering study report in March 2024, and has begun to implement measures as recommended by the study. Otter Tail has completed
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...PROTECTED DATA ENDS].

Otter Tail periodically evaluates its stock of critical spare parts and currently has
[PROTECTED DATA BEGINS...

...PROTECTED DATA

ENDS].

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OTTER TAIL POWER COMPANY
Docket No: E017-D-24-302

Response to: MN Department of Commerce
Analyst: Craig Addonizio - Justin Taylor
Date Received: November 14, 2024
Date Due: November 25, 2024
Date of Response: November 25, 2024
Responding Witness: Paul Vukonich, Manager Environmental Compliance - 218-739-8349

Information Request:

- (a) Does Otter Tail expect to incur any costs pursuant to the Legacy Coal Combustion Residuals (CCR) Rule published in the Federal Register on May 8, 2024 (89 FR 38950)?
- (b) Please identify all CCR impoundments/landfills/management units/sites/etc. for which Otter Tail may incur costs pursuant to the Legacy CCR Rule.
- (c) To the extent available, please provide any memos/presentations/documents/etc. Otter Tail has produced or had produced on its behalf discussing the Legacy CCR Rule's impact on the Company, as well as any preliminary estimates of compliance costs the Company has.

Attachments: 0

Response:

- (a) Otter Tail is in the process of assessing compliance obligations under the CCR Legacy Rule. We operate three facilities (two jointly) that are subject to the rule and will be required to complete Facility Evaluation Reports (FERs) #1 and #2 which are due in February 2026 and February 2027 respectively. Otter Tail is currently bidding out the work to prepare the FERs. These reports will serve to characterize areas onsite which may carry additional compliance obligations. Any additional obligations will be further known once the FERs are complete.
- (b) The CCR Legacy Rule regulates two types of CCR disposals: *Legacy Surface Impoundments* and a new class of CCR disposal known as *CCR Management Units* (CCRMUs). Otter Tail owns no Legacy Surface Impoundments. Otter Tail is not aware of any CCRMUs at the Hoot Lake Plant and Coyote Station facilities that would require additional compliance obligations.

Otter Tail has preliminarily identified potential CCRMUs at the Big Stone Plant site. Additional subsurface investigation for certain areas is being planned, and the official Facility Evaluation Reports, due in February 2026 and February 2027, will be key in determining if any additional compliance obligations will exist and any expected costs.

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It is expected the cost to complete each facility's FER will be approximately \$40,000 to \$80,000 (with these costs shared among the plant co-owners). At this time, compliance costs beyond the FERs are expected to be minimal at Coyote Station and Hoot Lake Plant. Compliance costs at Big Stone Plant are unknown at this time due to the following factors:

- The potential CCRMUs have not been fully characterized. Subsurface investigation will provide us more information on the extent and quantity of CCR in these areas as well as other site features which may affect compliance such as proximity to groundwater and presence/absence of cover soils.
- The CCR Legacy Rule appears to have substantially changed the definition of *liquids*. Further understanding, guidance, and site characterization is needed to determine accurate cost implications of this definitional change.
- Greater understanding and guidance are required regarding the allowance for onsite CCR beneficial use in a roadbed.

In summary, at this time, the extent and cost of our compliance obligations cannot be reasonably estimated. We are currently taking actions to better quantify our compliance obligations through an onsite subsurface investigation and issuing a Request for Proposal to complete the required FERs. Proposals are due in December 2024.

We expect to have a fuller picture of our regulated CCRMUs by February 2027 at the latest, concurrent with the completion of FER #2. The EPA has stated its intent to produce compliance guidance for industry, although the EPA's timeline remains unclear. Compliance costs beyond the FERs would start with groundwater monitoring network installation in 2028 followed by initiating closure for any identified CCRMUs. In addition to these issues, the impact of the recent elections and potential changes to EPA's guidance is unclear.

- (c) Please refer to Otter Tail Corporation's November 7, 2024 10-Q filed with the Securities and Exchange Commission (SEC) which notes the following concerning the potential impact of the Legacy CCR Rule on the Company including the potential costs of compliance:

Coal Combustion Residual Regulations

In May 2024, the Environmental Protection Agency (EPA) published a final rule amending coal combustion residual (CCR) regulations which introduces new requirements for the management of coal ash at active coal-fired power plants and inactive coal-fired power plants with a legacy surface impoundment. The regulations impose new requirements including groundwater monitoring, closure standards, post-closure care obligations, and potential remediation activities.

As of September 30, 2024, we have not recognized an ARO for any liabilities which may be incurred because of the EPA's final CCR rule as we cannot reasonably estimate the fair value of such a liability. We continue to review and assess the complex regulation to determine whether and to what extent, if any, our facilities will be impacted. Specifically, we are evaluating certain definitional matters within the regulation to determine the precise closure standards at an

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active facility. In addition, further site evaluations are necessary to determine the amount of coal ash stored on areas previously exempt from regulation, including areas of beneficial use.

If it is determined that any of our facilities are impacted and new requirements are imposed by the regulation, we will recognize an ARO as soon as we are able to reasonably estimate the fair value of the liability.

In terms of other documents discussing the Legacy CCR Rule's potential impact on the Company, the application of the Legacy CCR Rule to Otter Tail is by nature an analysis of complex regulations (as noted in the 10-Q), which Otter Tail has undertaken with outside legal counsel. This work and work incorporating the same are subject to attorney-client privilege that Otter Tail does not waive.

CERTIFICATE OF SERVICE

I, Hannah Olson, hereby certify that I have this day, served a true and correct copy of the following document to all persons at the addresses indicated below or on the attached list by electronic filing, electronic mail, courier, interoffice mail or by depositing the same enveloped with postage paid in the United States mail at St. Paul, Minnesota.

Minnesota Public Utilities Commission ORDER

Docket Number E-017/D-24-302
Dated this 4th day of March, 2025

/s/ Hannah Olson

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------|---|-------------------------------|---|--|--------------------|---------------------------|-------------------|-------------------|
| 1 | Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | | 12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States | Electronic Service | | No | 24-302D-24-302 |
| 2 | Generic | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | | Office of the Attorney General - Department of Commerce | 445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 3 | Loyal | Demmer | ldemmer@otpc.com | Otter Tail Power Co. | | 215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 4 | Sharon | Ferguson | sharon.ferguson@state.mn.us | | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States | Electronic Service | | No | 24-302D-24-302 |
| 5 | Jessica | Fyhrie | jfyhrie@otpc.com | Otter Tail Power Company | | PO Box 496 Fergus Falls MN, 56538-0496 United States | Electronic Service | | No | 24-302D-24-302 |
| 6 | Amber | Grenier | agrenier@otpc.com | Otter Tail Power Company | | 215 S. Cascade St. Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |
| 7 | Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 24-302D-24-302 |
| 8 | Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy Company, Inc. | | 11 East Superior St Ste 125 Duluth MN, 55802 United States | Electronic Service | | No | 24-302D-24-302 |
| 9 | James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | | 220 S 6th St Ste 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 24-302D-24-302 |
| 10 | Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting, LLC | | 961 N Lost Woods Rd Oconomowoc WI, 53066 United States | Electronic Service | | No | 24-302D-24-302 |
| 11 | Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | | 33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States | Electronic Service | | No | 24-302D-24-302 |
| 12 | Matthew | Olsen | molsen@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |
| 13 | Generic Notice | Regulatory | regulatory_filing_coordinators@otpc.com | Otter Tail Power Company | | 215 S. Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | Yes | 24-302D-24-302 |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------------------|--------------------------------------|--------------------------|---|---|--------------------|---------------------------|-------------------|-------------------|
| 14 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 15 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 16 | Cary | Stephenson | cstephenson@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 17 | Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | | 215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |

Otter Tail Power Company's
2024 Minnesota Annual Review of
Depreciation Certification Filing

Minnesota Docket No. E017/D-24-302

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

August 30, 2024



Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East
Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of its
2024 Annual Review of Depreciation Certification
Docket No. E017/D-24-
Initial Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail) hereby submits to the Minnesota Public Utilities Commission (Commission) its 2024 Annual Review of Depreciation Certification Initial Filing as in the above-referenced matter.

We have electronically filed this document with the Commission and copies have been served on all parties on the attached service list. A Certificate of Service is also enclosed.

Please contact me at (218) 739-8659 or ldemmer@otpc.com if you have any questions.

Sincerely,

/s/ LOYAL K. DEMMER
Loyal K. Demmer, CMA
Senior Depreciation Accountant

lcd
Enclosures
By electronic filing
c: Service List

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Otter Tail Power
Company's Petition for Approval
of its 2024 Annual Review of
Depreciation Certification**

Docket No. E017/D-24-

SUMMARY OF FILING

Notice is given that on August 30, 2024, Otter Tail Power Company filed its 2024 Annual Review of Depreciation Certification with the Minnesota Public Utilities Commission. The study is being filed pursuant to Minn. R. 7825.0700.

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

**In the Matter of Otter Tail Power
Company's Petition for Approval of its
2024 Annual Review of Depreciation
Certification**

**Docket No. E017/D-24-
PETITION**

I. INTRODUCTION

Pursuant to Minn. R. 7825.0700, Otter Tail Power Company (Otter Tail or the Company) hereby files its 2024 Annual Petition for Depreciation Certification. Otter Tail requests that the study be certified effective January 1, 2025.

II. SUMMARY OF FILING

Pursuant to Minn. Rules 7829.1300, Subp. 1, a one-paragraph summary of the filing accompanies this Petition.

III. GENERAL FILING INFORMATION

Pursuant to Minn. Rules 7829.1300, Subp. 3, the following information is provided.

A. Name, Address, and Telephone Number of Utility

(Minn. Rules 7829.1300, Subp. 3(A))

Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8200

B. Name, Address, and Telephone Number of Utility Attorney

(Minn. Rules 7829.1300, Subp. 3(B))

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8956
cstephenson@otpc.com

C. Date of Filing and Date Proposed Remaining Lives and Salvage Percentages to Take Effect

The filing date is August 30, 2024, and is based on plant-in-service and accumulated depreciation reserve balances as of December 31, 2023. Otter Tail requests that the proposed remaining lives and salvage percentages be approved effective January 1, 2025, for 2025 depreciation expense calculation and accumulated depreciation reserve posting purposes.

D. Statutes controlling schedule for processing the filing

(Minn. Rules 7829.1300, Subp. 3(D))

Minn. Stat. §216B.08 and §216B.11, and Minn. Rule 7825.0700 – 7825.0900 control the filing.

E. Title of Utility Employee Responsible for Filing

(Minn. Rules 7829.1300, Subp. 3(E))

Loyal K. Demmer, CMA
Senior Depreciation Accountant
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8659
ldemmer@otpc.com

F. Service List

(Minn. Rules 7829.0700)

Otter Tail requests that the following persons be placed on the Commission’s official service list for this matter and that any trade secret comments, requests, or information be provided to the following on behalf of Otter Tail:

Loyal K. Demmer, CMA
Senior Depreciation Accountant
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
ldemmer@otpc.com

Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 South Cascade Street
Fergus Falls, MN 56538-0496
cstephenson@otpc.com

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

G. Service on Other Parties

(Minn. Rules 7829.1300, Subp. 2; Minn. Rules 7829.0600)

Pursuant to Minn. Rule 7829.1300, Subp. 2, Otter Tail served a copy of this Petition on the Division of Energy Resources of the Department of Commerce and the Residential Utilities Division of the Office of the Attorney General. A summary of the filing prepared in accordance with Minn. Rule 7829.1300, Subp. 1 was served on all parties on Otter Tail's general service list.

IV. DESCRIPTION OF FILING

This filing constitutes Otter Tail's 2024 Petition for Annual Review for Depreciation Certification. Otter Tail's last five-year comprehensive depreciation study was filed in 2023 and approved by the Minnesota Public Utilities Commission (Commission) on November 28, 2023, in Docket No. E017/D-24-393. Otter Tail's next five-year comprehensive depreciation study is due September 1, 2028. Annual depreciation certification filings are to be filed on or before September 1 of each year in the four interim years between the five-year comprehensive depreciation studies.

This petition contains four attachments:

1. 2024 Depreciation Rate Study prepared by Foster Associates Consultants, LLC, Attachment 1
2. Proposed Remaining Lives and Salvage Percentages for Use in 2025, Attachment 2
3. Supplemental Comments, Attachment 3
4. Comparison of Retirement Dates between this filing and the Company's most recent Commission approved Resource Plan filed in Docket No. E017/RP-21-339, Attachment 4

Attachment 1 contains Statement B, which is a depreciation study derived Comparison of Current and Proposed Accruals showing depreciation expense for both total Company and the portion allocated to the Minnesota jurisdiction based on plant-in-service and accumulated depreciation reserve balances as of December 31, 2023. Other statements in Attachment No. 1 provide the rest of the schedules required in an annual review of depreciation certification.

Attachment 2 lists the property accounts for which the Company requests certification of the remaining lives and salvage percentages to be used in determining 2025 depreciation rates.

Please note that the Federal Energy Regulatory Commission (FERC) has recently issued an order that expands the FERC chart of accounts primarily for renewables in the areas of Wind, Solar, and Energy Storage.¹ It also incorporates additional breakouts for Computer Hardware and Software, and Communications Equipment by applicable function. Otter Tail's 2024 depreciation filing is based on plant in service balances as of December 31, 2023. For Otter Tail's 2025 Depreciation filing which will be based on books dated December 31, 2024, the Company plans on making Pro Forma adjustments from the historic FERC plant in service accounts to the new FERC Order 898 accounts where applicable. These new FERC accounts will be included for certification in next year's 2025 Depreciation Certification filing.

Attachment 3, "Supplemental Comments," addresses additional information not included in Attachment No. 1; specifically, it includes comments related to long-term depreciation planning and explanations about future plant additions and retirements.

Attachment 4 provides a schedule and narrative pursuant to Commission Order dated October 1, 2020, in Docket No. E017/D-19-547, explaining differences between the remaining lives used in this Petition and the Company's most recent Commission approved Integrated Resource Plan that was filed on September 1, 2021.

V. OTHER DEPRECIATION FILING MATTERS

A. Remaining Lives and Salvage Percentages

Otter Tail derives its Remaining Lives and Salvage Percentages based on 5-year Depreciation Studies and subsequently updates them annually in Technical Updates in each of the interim four years. These calculations are as of the Depreciation Study or annual Technical Update date (12/31 of the previous calendar year). These are then analyzed through the depreciation certification process and are proposed for use in the year following that year's depreciation certification filing to be used for calculating depreciation expense and accumulated depreciation reserve posting purposes. This results in a systematic and consecutive one-year lag, which when applied consistently over time yields uniform depreciation expense recognition in a rate regulated environment. In this filing, Otter Tail continues to reduce its depreciation study calculated Remaining Life for all average year of final retirement (AYFR) property by one year to account for the

¹ Order 898 in Docket No. RM21-11-000, Accounting and Reporting Treatment of Certain Renewable Energy Assets.

passage of time from the depreciation study date to the effective date when the depreciation parameters will be applied for depreciation expense calculation and accumulated depreciation reserve posting purposes.

B. Jamestown and Lake Preston Peaking Units Remaining Life Extensions

The three General Electric (GE) Frame 5 peaking units located at Jamestown, ND (Units I & II), and Lake Preston, SD, each with about 24,000 kW.(24 MW) nameplate capacity, are fuel oil peaking units accredited through MISO and contribute to Otter Tail's MISO firm capacity dispatchable generation requirements for overall reliability of the electrical grid. These 1976 - 1978 vintage units are essential to the Company for meeting peak demand capacity requirements during extreme energy demand scenarios. As fuel oil units, they are called on infrequently by MISO which leads to low lifetime unit hours. Otter Tail has maintained the units and made upgrades to keep the units operational. Otter Tail commissioned the firm of IEM Energy Consultants, LLC to conduct an Engineering Study to evaluate the unit's long-term serviceability. The study concluded that Otter Tail should be able to operate the units for the foreseeable future and would not put a finite life on these assets. Critical spare parts are the current life limiting factor and will continue to become more so in future years. Otter Tail will continue to monitor the critical spare parts market and plan accordingly.

C. Hoot Lake Plant Ash Landfill

The Hoot Lake Ash Landfill is in Post Closure Monitoring (PCM) status as of January 11, 2024. This status change is derived from the state permitting authority (Minnesota Pollution Control Agency (MPCA)) and the Environmental Protection Agency (EPA) Coal Combustion Residuals (CCR) rules and begins the 30-year Post Closure Monitoring period for the facility. Otter Tail, in preparation for the closing of Hoot Lake Plant, installed a final cover landfill cap to fulfill MPCA and EPA standards. In Docket E-017/D-16-729, the Commission approved a 30-year remaining life for this facility because of the extensive financial investment required to meet these requirements so close to the end of the plant's service life.² Consideration for the expanse of time needed to fully decommission the plant and place the plants foundation and other non-recyclable materials into the landfill before it could have its final cover constructed was not fully appreciated when the

² See Commission Order dated May 5, 2017, Order Point 1.

original 30-year period was set in 2016. Now that the costs of the facility's final capping are completed and the MPCA has approved the final closure, the 30-year EPA post closure monitoring period begins. Otter Tail notes the plant discontinued electrical production in May 2021, and completed the final ash landfill capping process with the receipt of the MPCA notification in January 2024. The Company is requesting a re-alignment to the 30-year PCM period and thus requesting an Average Year of Final Retirement (AYFR) of 2054 (2024 plus 30), up three years from the historic 2051 (2021 plus 30). This updated AYFR will better match the extensive costs associated with bringing the ash handling facilities and its final capping for this 100-year coal facility up to current standards over the future years that it benefits.

D. Coyote Station

In this Petition Otter Tail is not proposing any change to the depreciable life of Coyote Station. While we are not proposing any change to the depreciable life of Coyote Station, we believe it is important to provide information relevant to the Commission's treatment of Coyote Station in Otter Tail's most recent integrated resource plan (IRP) docket.

Coyote Station is a 428 MW, lignite fueled, mine-mouth generating facility located near Beulah, North Dakota, in which Otter Tail has a partial interest.³ Coyote Station entered service in 1981 and had a depreciable life at that time that assumed retirement in 2016. The depreciable life was extended at various times, the last being in 2013, when the depreciable life was extended by nine years, from 2032 to 2041⁴. In this Petition, Otter Tail has utilized an Average Year of Final Retirement (AYFR) of 2041 for Coyote Station, consistent with approvals going back to 2013.

The Commission recently issued its Order (IRP Order) in Otter Tail's most recent IRP docket.⁵ The Commission concluded and ordered that Otter Tail should cease using Coyote Station to serve Minnesota customers as soon as feasible but

³ Coyote Station is co-owned by Otter Tail (35 percent), Northern Minnesota Municipal Power Agency (represented by Minnkota Power Cooperative) (30 percent), Montana-Dakota Utilities Co. (MDU) (25 percent), and Northwestern Energy (10 percent).

⁴ *In the Matter of Otter Tail Power Company's Request for Approval of its Five-Year Depreciation Study*, MPUC Docket No. E017/D-13-795, Order (Apr. 7, 2014).

⁵ Order Modifying Otter Tail Power's 2023-2037 Integrated Resource Plan, June 22, 2037, Docket No. E-017/RP-21-339.

no later than December 31, 2031.⁶ In IRP filings made before the Commission’s IRP Order, Otter Tail addressed the treatment of undepreciated net book value of Coyote Station in the event Otter Tail withdraws from the plant.⁷ We proposed placing the undepreciated plant balance within a regulatory asset account coupled with an appropriate amortization schedule.⁸ We noted that the amortization schedule selected by the Commission could range from a schedule that aligns with the plant’s current retirement date of 2041, which would have the least impact on customers⁹, to accelerated recovery of the regulatory asset account balance to match the date of withdrawal, which would have greater customer impacts. Additional options would fall on a date between these bookends. In our last two depreciation filings we have included information illustrating the impact of accelerating Coyote Station deprecation to correspond with a shortened useful life for the plant.

There are many issues to resolve concerning Coyote Station, some of which may be addressed in the Commission’s pending docket regarding rate making treatment for early retiring electric facilities¹⁰. We anticipate the record and decision made in that docket will be relevant to Coyote Station. Also relevant will be the manner by which Otter Tail ultimately ceases utilizing Coyote Station to serve Minnesota customers. While it is premature to seek changes to Coyote

⁶ Ordering Point 4 of the IRP Order states the following: “Immediately following the order, Otter Tail shall, in a reasonable and prudent fashion, commence activities to remove all jurisdictional allocations to its Minnesota ratepayers for Coyote Station, such that it will no longer serve Minnesota customers, either through a sale, jurisdictional realignment or other means that ends all Minnesota ratepayer obligations for the plant, coal contracts and associated facilities as soon as feasible but no later than December 31, 2031. Otter Tail shall make quarterly filings from the date of this order with the Commission in this docket and in their next IRP filing on May 15, 2026, regarding the progress of efforts to remove Minnesota ratepayers from any obligation for the plant, coal contracts, and associated facilities. Regardless of a sale, jurisdictional realignment, or other arrangement, Otter Tail will no longer utilize Coyote Station to serve Minnesota customers beyond December 31, 2031.”

⁷ Otter Tail’s Initial IRP filing proposed withdrawing from Coyote Station and anticipated withdrawal in the 2028 timeframe. Otter Tail’s Supplemental IRP filing modified this request, seeking to withdraw from Coyote Station in the event Otter Tail is required to make a major, non-routine capital investment in the plant. As noted above, the Commission directed Otter Tail to withdraw from Coyote Station for purposes of serving Minnesota customers by 2031.

⁸ Otter Tail Supplemental IRP, March 31, 2023, at 41-42. While Otter Tail favors an amortization scheduled tied to the plant’s current retirement date of the 2041 (the approach with the least impact to ratepayers) the paramount issue is the authorization of recovery, including a return on the undepreciated regulatory asset.

⁹A similar mechanism was used by the MPUC for the abandonment of Xcel Energy’s Prairie Island nuclear facility EPU project.

¹⁰ *In the Matter of a Commission Inquiry into the Ratemaking Treatment for Early Retiring Generating Facilities Owned by Regulated Electric Utilities*, Docket No. E-002, E-015, E-017/CI-23-375. In addition to depreciation issues, there are other cost issues associated with exiting Coyote Station for Minnesota purposes that require consideration and resolution, including the treatment of the plant’s fuel supply agreement.

Station depreciation in the present depreciation docket, Otter Tail anticipates addressing Coyote Station in future filings, including Otter Tail’s next Minnesota rate case, and future depreciation and IRP dockets.

In anticipation of future filings addressing Coyote Station, we believe it is useful to illustrate the plant accounts and their associated balances and corresponding annual depreciation expense and the impact of adjusting the plant’s average year of final retirement (AYFR) to 2031.

Coyote Station
2024 Annualized Depreciation Rates and Accruals

| Account Description | 12/31/2023 | 2041 AYFR | | 2031 AYFR | | Difference | | Accrual |
|-------------------------------------|----------------------|--------------|--------------------|--------------|--------------------|--------------|--------------------|-------------|
| | Plant | Rate | Accrual | Rate | Accrual | Rate | Accrual | % Change |
| A | B | C | D=B*C | E | F=B*E | G=E-C | H=F-D | I=H/D |
| 311.00 Structures and Improvements | \$ 35,004,316 | 1.68% | \$ 588,073 | 3.63% | \$1,270,657 | 1.95% | \$ 682,584 | 116% |
| 312.00 Boiler Plant Equipment | 107,451,964 | 2.43% | 2,611,083 | 5.35% | 5,748,680 | 2.92% | 3,137,597 | 120% |
| 314.00 Turbogenerator Units | 26,209,547 | 2.87% | 752,214 | 6.37% | 1,669,548 | 3.50% | 917,334 | 122% |
| 315.00 Accessory Electric Equipment | 12,185,103 | 1.80% | 219,332 | 3.92% | 477,656 | 2.12% | 258,324 | 118% |
| 316.00 Misc. Power Plant Equip. | 2,424,444 | 3.65% | 88,492 | 8.17% | 198,077 | 4.52% | 109,585 | 124% |
| Total Coyote Station | \$183,275,374 | 2.32% | \$4,259,193 | 5.11% | \$9,364,618 | 2.79% | \$5,105,425 | 120% |

As noted above, maintaining Coyote Station’s current AYFR has the least customer impacts, whereas an AYFR of 2031 (and corresponding amortization schedule) would have more customer impacts. We recognize this table does not fully account for the unique and yet to be determined issues associated with Otter Tail withdrawing from the Minnesota allocated portion of Coyote Station (as compared to withdrawing entirely from the plant). There will be many issues to consider in conforming Coyote Station’s depreciation to the Commission’s IRP Order. The foregoing is provided to highlight the potential impact and options associated with the Commission’s IRP Order that Otter Tail intends to address in future filings.

VI. CONCLUSION

Otter Tail respectfully requests that the Commission approve this annual petition for depreciation certification to be effective January 1, 2025.

Dated: August 30, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

/s/ LOYAL K. DEMMER

Loyal K. Demmer, CMA

Senior Depreciation Accountant

Otter Tail Power Company

215 South Cascade Street

Fergus Falls, MN 56538-0496

(218) 739-8659

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2024 Technical Update



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August 2024

EXECUTIVE SUMMARY

INTRODUCTION

This report presents the findings and recommendations developed in a 2024 technical update of depreciation rates for Otter Tail Power Company (Otter Tail or Company) prepared by Foster Associates Consultants, LLC. The parameters (*i.e.*, projection curves, projection lives and future net salvage rates) used in the update were developed in the Company's 2023 Depreciation Study based on December 31, 2022 plant and reserve balances. Age distributions of surviving plant on December 31, 2023 were used in the 2024 update to derive composite service life statistics and theoretical depreciation reserves.

The purpose of a technical update is to adjust depreciation rates for changes in the variables associated with a remaining life accrual rate. The variables for an account include the age distribution of surviving plant, the recorded depreciation reserve and the average net salvage rate used in the calculation of a theoretical reserve. A technical update retains the parameters developed and/or approved in the most recent full depreciation study and adjusts depreciation rates for subsequent changes in plant, reserves and realized net salvage activity.

The principal findings from this review are summarized in the attached statements. Statement A provides a comparative summary of current and updated annual depreciation rates for each rate category. Statement B provides a comparison of current and updated annual depreciation accruals. Statement C provides a comparison of recorded and computed depreciation reserves for each rate category. Statement D provides a summary of the components used to obtain a weighted-average net salvage rate for each plant account. Statement E provides a computation of estimated future net salvage rates for life-span categories. Statement F provides a comparative summary of current and updated parameters and statistics including projection life, projection curve, average service life, average remaining life, and average and future net salvage rates.

SCOPE OF UPDATE

The principal activities undertaken in the course of conducting the 2024 technical update included:

- Collection of plant and net salvage data;
- Reconciliation of data to the official records of the Company;
- Development of continuity schedules;
- Computation of average net salvage rates; and
- Development of adjusted accrual rates for each rate category.

Accrual rates currently used by Otter Tail were developed from composite service life statistics approved in Docket No. E-017/D-23-393. Depreciation accruals and reserve activity recorded in 2023 were posted to December 31, 2022 reserves to obtain appropriate reserve ratios for the 2024 technical update.

Notwithstanding that Otter Tail responsibly rebalanced depreciation reserves (with Commission approval) in each full study and each technical update for nearly twenty (20) years, the Department objected in Docket No. E-017/D-11-886 falsely claiming that: "... the only clear effect of OTP's practice of redistributing reserves is to create a layer of confusion on OTP's depreciation calculations." The Commission concurred with the Department and ordered that: "OTP shall discontinue redistributing its depreciation reserves effective with this filing." The stability in accrual rates and control of amortization accounts that Otter Tail achieved by rebalancing depreciation reserves was thus abolished by Commission order and removed from subsequent studies and technical updates.

UPDATED DEPRECIATION RATES

Table 1 below provides a summary of the changes in annual rates and accruals resulting from the 2024 technical update. Rates updated for each primary account (with the exception of amortization accounts) have been developed including authorized allowances for net salvage.

| Function | Accrual Rates | | | 2024 Annualized Accrual | | |
|-----------------------------|---------------|---------|------------|-------------------------|---------------|------------|
| | Current | Updated | Difference | Current | Updated | Difference |
| A | B | C | D=C-B | E | F | G=F-E |
| <i>Intangible Plant</i> | 11.79% | 11.79% | 0.00% | \$ 4,291,603 | \$ 4,291,603 | \$ - |
| <i>Steam Production</i> | 2.79% | 2.79% | 0.00% | 14,858,567 | 14,869,235 | 10,668 |
| <i>Hydraulic Production</i> | 1.27% | 1.50% | 0.23% | 146,337 | 173,174 | 26,837 |
| <i>Other Production</i> | 3.06% | 3.04% | -0.02% | 5,840,168 | 5,800,064 | (40,104) |
| <i>Wind Production</i> | 3.07% | 3.10% | 0.03% | 18,804,124 | 18,996,980 | 192,856 |
| <i>Solar Production</i> | 3.22% | 3.40% | 0.18% | 1,927,020 | 2,027,977 | 100,957 |
| <i>Transmission</i> | 1.54% | 1.54% | 0.00% | 11,606,178 | 11,640,482 | 34,304 |
| <i>Distribution</i> | 2.44% | 2.46% | 0.02% | 15,960,815 | 16,049,876 | 89,061 |
| <i>General Plant</i> | 4.89% | 4.90% | 0.01% | 3,341,971 | 3,352,938 | 10,967 |
| TOTAL UTILITY PLANT | 2.62% | 2.65% | 0.03% | \$ 76,776,783 | \$ 77,202,329 | \$ 425,546 |

Table 1. Current and Updated Rates and Accruals

Adjustments developed in the technical update produce a composite depreciation rate of 2.65 percent. Depreciation expense is currently accrued at an equivalent rate of 2.62 percent. The updated change in the composite depreciation rate produces an increase of 0.03 percentage points.

A continued application of rates derived from currently approved parameters would produce annual depreciation expense of \$76,776,783 compared with an annual expense of \$77,202,329 using rates developed in the update. The increase in total utility expense is \$426,546.

STATEMENTS

INTRODUCTION

This section provides a comparative summary of depreciation rates, annual depreciation accruals, recorded and computed depreciation reserves, and current and updated service life and net salvage parameters for Otter Tail Power Company. The content of these statements is briefly described below.

- Statement A provides a comparative summary of current and updated annual depreciation rates for calendar year 2024 using the straight-line method, vintage group procedure, remaining-life technique.
- Statement B provides a comparison of the current and updated annualized depreciation accruals for calendar year 2024 based upon the rates developed in Statement A.
- Statement C provides a comparison of recorded and computed reserves for each rate category.
- Statement D provides a summary of the components used to obtain a weighted average net salvage rate for each rate category.
- Statement E provides a computation of the estimated future net salvage rate for life-span categories.
- Statement F provides a comparative summary of current and updated parameters including projection life, projection curve and future net salvage rates. The statement also contains current and updated statistics including average service life, average remaining life, and average net salvage rates.

Current depreciation accruals shown on Statement B are the product of the plant investment (Column B) and the current depreciation rates (Column D) shown on Statement A. Similarly, updated depreciation accruals shown on Statement B are the product of the plant investment and updated depreciation rates (Column H) shown on Statement A. Remaining life accrual rates are given by:

$$\text{Accrual Rate} = \frac{1.0 - \text{Reserve Ratio} - \text{Future Net Salvage Rate}}{\text{Remaining Life}}.$$

Minnesota State Agency Rules 7825.0700, Subpart 1 provide that each utility shall file the following schedules (for each year since the last certification) in the form prescribed by the Commission.

1. Plant in service (by primary account):
 - a) Beginning and ending plant balances;
 - b) Additions and retirements; and
 - c) Adjustments and transfers.
2. Analysis of depreciation reserve (by primary account):
 - a) Beginning and ending reserve balances;
 - b) Depreciation accruals and plant retirements;
 - c) Cost of removal and gross salvage value; and
 - d) Transfers, adjustments and other debits (credits).
3. Summary of annual depreciation accruals (by primary account):
 - a) Plant balance;
 - b) Estimated net salvage;
 - c) Depreciation reserve;
 - d) Probable service life; and
 - e) Depreciation accrual and rate.

While the Agency rules do not require submission of continuity schedules in a technical update, this section includes the following statements which contain the above information for calendar year 2023:

1. Statement G – Plant Activity;
2. Statement H – Analysis of Depreciation Reserve; and
3. Statement I – Summary of Annual Depreciation Accruals.

Minnesota State Agency Rules 7825.0700, Subpart 2-B provide that each utility shall disclose a list of any major future additions or retirements to the plant accounts that the utility believes may have a material effect on the current certification results. Any future additions or retirements that would materially affect the current certification results are discussed in the Company's application.

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

| Account Description A | Current | | | Updated | | | |
|--|--------------------------|-----------------------|-------------------|--------------------------|-----------------------|--------------------|-------------------|
| | Rem. Life B | Fut. Net Salvage C | Accrual Rate D | Rem. Life E | Fut. Net Salvage F | Reserve Ratio G | Accrual Rate H |
| INTANGIBLE PLANT | | | | | | | |
| 303.91 Software - 5 Year | ← 5 Year Amortization → | | | ← 5 Year Amortization → | | | |
| 303.92 Software - 10 Year | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| Total Intangible Plant | | | 11.79% | 5.43 | | 41.30% | 11.79% |
| STEAM PRODUCTION | | | | | | | |
| 311.00 Structures and Improvements | 21.68 | -6.6% | 2.44% | 20.73 | -6.5% | 55.63% | 2.44% |
| 312.00 Boiler Plant Equipment | 21.33 | -6.8% | 3.11% | 20.40 | -6.7% | 42.47% | 3.12% |
| 312.10 Boiler Plant Equipment - Landfill | 27.46 | | 2.23% | 29.31 | | 63.52% | 1.24% |
| 314.00 Turbogenerator Units | 20.58 | -7.1% | 2.11% | 19.50 | -7.0% | 63.01% | 2.29% |
| 315.00 Accessory Electric Equipment | 21.30 | -6.8% | 2.25% | 20.34 | -6.7% | 60.85% | 2.24% |
| 316.00 Miscellaneous Power Plant Equipment | 20.58 | -6.9% | 3.10% | 19.71 | -6.8% | 45.60% | 3.12% |
| Total Steam Production Plant | | | 2.79% | 20.54 | -6.5% | 49.19% | 2.79% |
| HYDRAULIC PRODUCTION | | | | | | | |
| 331.00 Structures and Improvements | 37.44 | | 0.32% | 36.61 | | 43.09% | 1.55% |
| 332.00 Reservoirs, Dams and Waterways | 37.50 | | 1.70% | 36.59 | | 34.16% | 1.80% |
| 333.00 Water Wheels, Turbines & Generators | 37.46 | | 0.09% | 36.56 | | 96.63% | 0.09% |
| 334.00 Accessory Electric Equipment | 37.50 | | 1.70% | 36.62 | | 34.14% | 1.80% |
| 335.00 Miscellaneous Power Plant Equipment | 37.48 | | 0.21% | 36.58 | | 101.96% | -0.05% |
| Total Hydraulic Production Plant | | | 1.27% | 36.59 | | 45.08% | 1.50% |
| OTHER PRODUCTION | | | | | | | |
| 341.00 Structures and Improvements | 28.81 | -2.2% | 3.06% | 28.03 | -2.2% | 16.67% | 3.05% |
| 342.00 Fuel Holders and Accessories | 26.86 | -2.5% | 3.09% | 27.28 | -2.6% | 21.77% | 2.92% |
| 343.00 Prime Movers | 27.99 | -2.4% | 3.07% | 27.25 | -2.5% | 19.40% | 3.06% |
| 345.00 Accessory Electric Equipment | 28.39 | -2.4% | 2.98% | 27.95 | -2.5% | 20.16% | 2.92% |
| 346.00 Miscellaneous Power Plant Equipment | 27.44 | -2.3% | 3.11% | 27.19 | -2.4% | 19.44% | 3.02% |
| Total Other Production Plant | | | 3.07% | 27.41 | -2.4% | 19.09% | 3.04% |
| WIND PRODUCTION | | | | | | | |
| 341.00 Structures and Improvements | 25.40 | -9.0% | 3.01% | 24.40 | -9.0% | 33.70% | 3.03% |
| 344.00 Generators | 25.29 | -8.7% | 3.07% | 24.36 | -8.7% | 32.08% | 3.10% |
| 345.00 Accessory Electric Equipment | 25.32 | -8.8% | 3.01% | 24.12 | -8.8% | 33.18% | 3.08% |
| 346.00 Miscellaneous Power Plant Equipment | 20.26 | -9.7% | 4.58% | 21.45 | -9.7% | 9.42% | 4.77% |
| Total Wind Production Plant | | | 3.06% | 24.34 | -8.7% | 32.19% | 3.10% |
| SOLAR PRODUCTION | | | | | | | |
| 341.00 Structures and Improvements | 21.86 | -11.9% | 3.24% | 32.74 | -12.5% | 1.07% | 3.40% |
| 345.00 Accessory Electric Equipment | 21.86 | -12.0% | 3.22% | 32.92 | -12.6% | 0.92% | 3.39% |
| 346.00 Miscellaneous Power Plant Equipment | 21.86 | -12.1% | 3.22% | 33.01 | -12.7% | 0.85% | 3.39% |
| Total Solar Production Plant | | | 3.23% | 32.92 | -12.6% | 0.92% | 3.39% |
| TRANSMISSION PLANT | | | | | | | |
| 353.00 Station Equipment | 56.05 | -5.0% | 1.56% | 55.63 | -5.0% | 18.63% | 1.55% |
| 354.00 Towers and Fixtures | 73.24 | -10.0% | 1.37% | 72.24 | -10.0% | 11.21% | 1.37% |
| 355.00 Poles and Fixtures | 65.47 | -50.0% | 1.73% | 65.33 | -50.0% | 35.46% | 1.75% |
| 356.00 Overhead Conductors and Devices | 67.29 | -30.0% | 1.52% | 67.09 | -30.0% | 27.27% | 1.53% |
| 358.00 Underground Conductors and Devices | 21.21 | -5.0% | 1.40% | 11.50 | -5.0% | 102.05% | 0.26% |
| Total Transmission Plant | | | 1.54% | 64.62 | -23.1% | 22.80% | 1.54% |
| DISTRIBUTION PLANT | | | | | | | |
| 362.00 Station Equipment | 36.35 | -5.0% | 2.12% | 36.38 | -5.0% | 28.10% | 2.11% |
| 364.00 Poles, Towers and Fixtures | 50.49 | -125.0% | 3.28% | 50.55 | -125.0% | 58.80% | 3.29% |
| 365.00 Overhead Conductors and Devices | 46.05 | -70.0% | 2.07% | 46.31 | -70.0% | 72.91% | 2.10% |
| 367.00 Underground Conductors and Devices | 36.33 | -5.0% | 1.81% | 37.78 | -5.0% | 34.53% | 1.87% |

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

| Account Description | Current | | | Updated | | | |
|--|--------------------------|------------------|--------------|--------------------------|------------------|---------------|--------------|
| | Rem. Life | Fut. Net Salvage | Accrual Rate | Rem. Life | Fut. Net Salvage | Reserve Ratio | Accrual Rate |
| A | B | C | D | E | F | G | H |
| 368.00 Line Transformers | 32.56 | 30.0% | 1.62% | 32.58 | 30.0% | 17.17% | 1.62% |
| 369.00 Overhead Services | 33.48 | -300.0% | 7.99% | 33.02 | -300.0% | 135.58% | 8.01% |
| 369.10 Underground Services | 37.18 | -50.0% | 2.78% | 37.00 | -50.0% | 46.98% | 2.78% |
| 370.00 Meters | 20.46 | | 2.99% | 20.00 | | 41.70% | 2.92% |
| 370.05 Smart Meters | 15.57 | | 5.19% | 14.58 | | 24.04% | 5.21% |
| 370.10 Load Management Switches | 3.72 | | 0.15% | 3.12 | | 99.84% | 0.05% |
| 371.10 Electric Vehicle Charging Stations | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| 371.20 Other Private Lighting | 17.41 | -5.0% | 5.73% | 17.17 | -5.0% | 7.34% | 5.69% |
| 373.00 Street Lighting and Signal Systems | 16.47 | -10.0% | 5.84% | 16.47 | -10.0% | 11.57% | 5.98% |
| Total Distribution Plant | | | 2.44% | 33.84 | -30.5% | 40.47% | 2.46% |
| GENERAL PLANT | | | | | | | |
| Depreciable | | | | | | | |
| 390.00 Structures and Improvements | 33.74 | | 1.99% | 34.67 | | 32.04% | 1.96% |
| 390.10 General Office Buildings | 17.09 | 46.7% | 0.73% | 16.14 | 46.5% | 41.51% | 0.74% |
| 390.20 Fleet Service Center Building | 21.82 | 71.1% | -1.37% | 20.89 | 59.1% | 48.38% | -0.36% |
| 390.25 Fleet Service Center - Jamestown | 52.47 | 152.3% | -1.08% | 51.61 | 152.3% | 5.11% | -1.11% |
| 390.30 Central Stores Building | 21.81 | 87.9% | -1.09% | 20.87 | 83.7% | 33.54% | -0.83% |
| 396.00 Power Operated Equipment | 17.29 | 5.0% | 4.43% | 16.46 | 5.0% | 23.80% | 4.33% |
| 397.40 Communication Towers | 29.43 | -5.0% | 1.69% | 28.67 | -5.0% | 56.92% | 1.68% |
| Total Depreciable | | | 1.35% | 28.66 | 24.1% | 33.36% | 1.38% |
| Amortizable | | | | | | | |
| 391.00 Office Furniture | ← 15 Year Amortization → | | | ← 15 Year Amortization → | | | |
| 391.10 Office Equipment | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| 391.20 Duplicating Equipment | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| 391.50 Computer Systems | ← 5 Year Amortization → | | | ← 5 Year Amortization → | | | |
| 391.60 Computer Related Equipment | ← 5 Year Amortization → | | | ← 5 Year Amortization → | | | |
| 394.00 Tools, Shop and Garage Equipment | ← 15 Year Amortization → | | | ← 15 Year Amortization → | | | |
| 394.20 Automated Meter Reading Equipment | ← 15 Year Amortization → | | | ← 15 Year Amortization → | | | |
| 397.00 Communication Equipment | ← 15 Year Amortization → | | | ← 15 Year Amortization → | | | |
| 397.10 Radio Telecommunication Equipment | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| 397.20 Microwave Equipment | ← 15 Year Amortization → | | | ← 15 Year Amortization → | | | |
| 397.30 Radio Load Control Equipment | ← 10 Year Amortization → | | | ← 10 Year Amortization → | | | |
| Total Amortizable | | | 11.16% | 4.91 | | 49.63% | 11.16% |
| Total General Plant | | | 4.88% | 11.01 | 15.4% | 39.22% | 4.90% |
| TOTAL UTILITY | | | 2.63% | 29.50 | -15.9% | 33.55% | 2.64% |
| STEAM PRODUCTION | | | | | | | |
| Big Stone | | | | | | | |
| 311.00 Structures and Improvements | 22.79 | -5.8% | 2.78% | 21.84 | -5.7% | 45.12% | 2.77% |
| 312.00 Boiler Plant Equipment | 22.79 | -5.8% | 3.49% | 21.85 | -5.7% | 29.36% | 3.49% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | |
| 314.00 Turbogenerator Units | 22.77 | -5.8% | 1.74% | 21.83 | -5.7% | 65.91% | 1.82% |
| 315.00 Accessory Electric Equipment | 22.78 | -5.8% | 2.51% | 21.84 | -5.7% | 51.10% | 2.50% |
| 316.00 Miscellaneous Power Plant Equipment | 22.78 | -5.8% | 2.71% | 21.84 | -5.7% | 45.28% | 2.77% |
| Total Big Stone | | | 3.09% | 21.85 | -5.7% | 38.08% | 3.09% |

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

| Account Description A | Current | | | Updated | | | |
|--|----------------|-----------------------|-------------------|----------------|-----------------------|--------------------|-------------------|
| | Rem. Life B | Fut. Net Salvage C | Accrual Rate D | Rem. Life E | Fut. Net Salvage F | Reserve Ratio G | Accrual Rate H |
| Hoot Lake Units 2 and 3 | | | | | | | |
| 311.00 Structures and Improvements | | | | | | | |
| 312.00 Boiler Plant Equipment | | | | | | | |
| 312.10 Boiler Plant Equipment - Landfill | 27.46 | | 2.23% | 29.31 | | 63.52% | 1.24% |
| 314.00 Turbogenerator Units | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | |
| Total Hoot Lake Units 2 and 3 | | | 2.23% | 29.31 | | 63.52% | 1.24% |
| Coyote | | | | | | | |
| 311.00 Structures and Improvements | 18.03 | -8.6% | 1.67% | 17.08 | -8.5% | 79.88% | 1.68% |
| 312.00 Boiler Plant Equipment | 18.04 | -8.6% | 2.41% | 17.09 | -8.5% | 67.03% | 2.43% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | |
| 314.00 Turbogenerator Units | 18.05 | -8.6% | 2.57% | 17.10 | -8.5% | 59.50% | 2.87% |
| 315.00 Accessory Electric Equipment | 18.04 | -8.6% | 1.79% | 17.08 | -8.5% | 77.71% | 1.80% |
| 316.00 Miscellaneous Power Plant Equipment | 18.06 | -8.6% | 3.68% | 17.10 | -8.5% | 46.08% | 3.65% |
| Total Coyote | | | 2.27% | 17.09 | -8.5% | 68.84% | 2.32% |
| HYDRAULIC PRODUCTION | | | | | | | |
| Hoot Lake | | | | | | | |
| 331.00 Structures and Improvements | 37.15 | | 0.03% | 36.61 | | 45.95% | 1.48% |
| 332.00 Reservoirs, Dams and Waterways | 37.48 | | 1.56% | 36.47 | | 81.00% | 0.52% |
| 333.00 Water Wheels, Turbines & Generators | 37.34 | | 0.03% | 36.44 | | 98.93% | 0.03% |
| 334.00 Accessory Electric Equipment | 37.54 | | 2.43% | 36.64 | | 5.73% | 2.57% |
| 335.00 Miscellaneous Power Plant Equipment | 37.50 | | 0.23% | 36.58 | | 114.24% | -0.39% |
| Total Hoot Lake | | | 1.08% | 36.61 | | 42.95% | 1.56% |
| Wright | | | | | | | |
| 331.00 Structures and Improvements | 37.35 | | 0.20% | 36.45 | | 92.79% | 0.20% |
| 332.00 Reservoirs, Dams and Waterways | 37.47 | | 0.21% | 36.57 | | 84.77% | 0.42% |
| 333.00 Water Wheels, Turbines & Generators | 37.49 | | 0.08% | 36.58 | | 97.21% | 0.08% |
| 334.00 Accessory Electric Equipment | 37.45 | | 0.11% | 36.55 | | 95.94% | 0.11% |
| 335.00 Miscellaneous Power Plant Equipment | 37.46 | | 0.17% | 36.56 | | 93.96% | 0.17% |
| Total Wright | | | 0.16% | 36.57 | | 90.30% | 0.27% |
| Pisgah | | | | | | | |
| 331.00 Structures and Improvements | 37.33 | | 0.26% | 36.43 | | 90.58% | 0.26% |
| 332.00 Reservoirs, Dams and Waterways | 37.52 | | 3.24% | 36.62 | | -17.59% | 3.21% |
| 333.00 Water Wheels, Turbines & Generators | 37.45 | | 0.14% | 36.55 | | 95.05% | 0.14% |
| 334.00 Accessory Electric Equipment | 37.45 | | 0.13% | 36.55 | | 95.34% | 0.13% |
| 335.00 Miscellaneous Power Plant Equipment | 37.50 | | 0.24% | 36.59 | | 91.22% | 0.24% |
| Total Pisgah | | | 2.83% | 36.61 | | -2.63% | 2.80% |
| Dayton Hollow | | | | | | | |
| 331.00 Structures and Improvements | 37.54 | | 2.72% | 36.63 | | 0.71% | 2.71% |
| 332.00 Reservoirs, Dams and Waterways | 37.51 | | 1.34% | 36.60 | | 39.96% | 1.64% |
| 333.00 Water Wheels, Turbines & Generators | 37.46 | | 0.13% | 36.55 | | 95.13% | 0.13% |
| 334.00 Accessory Electric Equipment | 37.42 | | 0.09% | 36.52 | | 96.61% | 0.09% |
| 335.00 Miscellaneous Power Plant Equipment | 37.50 | | 0.22% | 36.59 | | 91.89% | 0.22% |
| Total Dayton Hollow | | | 1.20% | 36.59 | | 47.77% | 1.43% |

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

| Account Description | Current | | | Updated | | | |
|--|-----------|------------------|--------------|-----------|------------------|---------------|--------------|
| | Rem. Life | Fut. Net Salvage | Accrual Rate | Rem. Life | Fut. Net Salvage | Reserve Ratio | Accrual Rate |
| A | B | C | D | E | F | G | H |
| <u>Taplin Gorge</u> | | | | | | | |
| 331.00 Structures and Improvements | 37.06 | | 0.02% | 36.18 | | 99.33% | 0.02% |
| 332.00 Reservoirs, Dams and Waterways | 37.39 | | 0.13% | 36.53 | | 81.64% | 0.50% |
| 333.00 Water Wheels, Turbines & Generators | 37.03 | | 0.02% | 36.14 | | 99.41% | 0.02% |
| 334.00 Accessory Electric Equipment | 37.40 | | 0.08% | 36.50 | | 97.03% | 0.08% |
| 335.00 Miscellaneous Power Plant Equipment | 37.47 | | 0.17% | 36.57 | | 93.73% | 0.17% |
| Total Taplin Gorge | | | 0.13% | 36.52 | | 84.89% | 0.41% |
| <u>OTHER PRODUCTION</u> | | | | | | | |
| <u>Jamestown</u> | | | | | | | |
| 341.00 Structures and Improvements | 10.35 | -6.2% | 2.09% | 16.13 | -6.8% | 86.37% | 1.28% |
| 342.00 Fuel Holders and Accessories | 10.36 | -6.2% | 2.90% | 16.14 | -6.8% | 78.78% | 1.75% |
| 343.00 Prime Movers | 10.35 | -6.2% | 1.70% | 16.13 | -6.8% | 87.19% | 1.23% |
| 345.00 Accessory Electric Equipment | 10.35 | -6.2% | 2.59% | 16.13 | -6.8% | 81.66% | 1.57% |
| 346.00 Miscellaneous Power Plant Equipment | 10.36 | -6.2% | 3.57% | 16.15 | -6.8% | 72.56% | 2.13% |
| Total Jamestown | | | 1.86% | 16.13 | -6.8% | 86.42% | 1.27% |
| <u>Jamestown Unit 1</u> | | | | | | | |
| 341.00 Structures and Improvements | 10.35 | -6.2% | 2.03% | 16.13 | -7.0% | 87.18% | 1.23% |
| 342.00 Fuel Holders and Accessories | 10.36 | -6.2% | 3.07% | 16.14 | -7.0% | 77.40% | 1.83% |
| 343.00 Prime Movers | 10.35 | -6.2% | 2.01% | 16.13 | -7.0% | 84.41% | 1.40% |
| 345.00 Accessory Electric Equipment | 10.34 | -6.2% | 1.82% | 16.11 | -7.0% | 89.18% | 1.11% |
| 346.00 Miscellaneous Power Plant Equipment | 10.36 | -6.2% | 3.73% | 16.15 | -7.0% | 71.24% | 2.21% |
| Total Jamestown Unit 1 | | | 2.14% | 16.13 | -7.0% | 83.85% | 1.43% |
| <u>Jamestown Unit 2</u> | | | | | | | |
| 341.00 Structures and Improvements | 10.36 | -6.2% | 3.11% | 16.14 | -7.0% | 77.04% | 1.86% |
| 342.00 Fuel Holders and Accessories | 10.35 | -6.2% | 1.41% | 16.12 | -7.0% | 93.01% | 0.87% |
| 343.00 Prime Movers | 10.35 | -6.2% | 1.54% | 16.13 | -7.0% | 89.36% | 1.09% |
| 345.00 Accessory Electric Equipment | 10.36 | -6.2% | 4.34% | 16.15 | -7.0% | 65.51% | 2.57% |
| 346.00 Miscellaneous Power Plant Equipment | 10.35 | -6.2% | -0.16% | 16.12 | -7.0% | 107.63% | -0.04% |
| Total Jamestown Unit 2 | | | 1.60% | 16.13 | -7.0% | 88.91% | 1.12% |
| <u>Lake Preston</u> | | | | | | | |
| 341.00 Structures and Improvements | 10.36 | -7.1% | 3.39% | 16.14 | -7.9% | 73.54% | 2.13% |
| 342.00 Fuel Holders and Accessories | 10.35 | -7.1% | 1.77% | 16.13 | -7.9% | 90.58% | 1.07% |
| 343.00 Prime Movers | 10.35 | -7.1% | 1.59% | 16.13 | -7.9% | 87.07% | 1.29% |
| 345.00 Accessory Electric Equipment | 10.35 | -7.1% | 1.66% | 16.13 | -7.9% | 91.59% | 1.01% |
| 346.00 Miscellaneous Power Plant Equipment | 10.35 | -7.1% | 1.00% | 16.12 | -7.9% | 97.54% | 0.64% |
| Total Lake Preston | | | 1.72% | 16.13 | -7.9% | 86.94% | 1.30% |
| <u>Solway Combustion Turbine</u> | | | | | | | |
| 341.00 Structures and Improvements | 15.19 | -1.6% | 3.23% | 14.23 | -1.6% | 54.58% | 3.30% |
| 342.00 Fuel Holders and Accessories | 15.19 | -1.6% | 3.85% | 14.23 | -1.6% | 53.61% | 3.37% |
| 343.00 Prime Movers | 15.19 | -1.6% | 3.94% | 14.23 | -1.6% | 42.80% | 4.13% |
| 345.00 Accessory Electric Equipment | 15.19 | -1.6% | 3.19% | 14.22 | -1.6% | 56.38% | 3.18% |
| 346.00 Miscellaneous Power Plant Equipment | 15.19 | -1.6% | 3.46% | 14.23 | -1.6% | 52.58% | 3.44% |
| Total Solway Combustion Turbine | | | 3.78% | 14.23 | -1.6% | 45.87% | 3.91% |
| <u>Astoria Station Combustion Turbine</u> | | | | | | | |
| 341.00 Structures and Improvements | 32.09 | -2.2% | 3.03% | 31.17 | -2.2% | 7.88% | 3.03% |
| 342.00 Fuel Holders and Accessories | 32.09 | -2.2% | 3.03% | 31.17 | -2.2% | 7.98% | 3.02% |
| 343.00 Prime Movers | 32.09 | -2.2% | 3.03% | 31.17 | -2.2% | 7.98% | 3.02% |
| 345.00 Accessory Electric Equipment | 32.09 | -2.2% | 3.03% | 31.17 | -2.2% | 7.98% | 3.02% |
| 346.00 Miscellaneous Power Plant Equipment | 32.09 | -2.2% | 3.03% | 31.17 | -2.2% | 7.98% | 3.02% |
| Total Astoria Station Combustion Turbine | | | 3.03% | 31.17 | -2.2% | 7.96% | 3.02% |

OTTER TAIL POWER COMPANY

Statement A

Comparison of Current and Updated Accrual Rates

Current: VG Procedure / RL Technique

Updated: VG Procedure / RL Technique

| Account Description A | Current | | | Updated | | | |
|--|----------------|-----------------------|-------------------|----------------|-----------------------|--------------------|-------------------|
| | Rem. Life B | Fut. Net Salvage C | Accrual Rate D | Rem. Life E | Fut. Net Salvage F | Reserve Ratio G | Accrual Rate H |
| WIND PRODUCTION | | | | | | | |
| <u>Ashtabula</u> | | | | | | | |
| 341.00 Structures and Improvements | 19.96 | -6.3% | 2.64% | 19.01 | -6.4% | 56.14% | 2.64% |
| 344.00 Generators | 19.96 | -6.3% | 2.76% | 19.01 | -6.4% | 52.86% | 2.82% |
| 345.00 Accessory Electric Equipment | 19.96 | -6.3% | 2.68% | 19.01 | -6.4% | 55.44% | 2.68% |
| 346.00 Miscellaneous Power Plant Equipment | 19.97 | -6.3% | 5.63% | 19.02 | -6.4% | -0.52% | 5.62% |
| Total Ashtabula | | | 2.75% | 19.01 | -6.4% | 53.05% | 2.81% |
| <u>Ashtabula III</u> | | | | | | | |
| 341.00 Structures and Improvements | 24.66 | -12.5% | 3.11% | 23.75 | -12.2% | 36.46% | 3.19% |
| 344.00 Generators | 24.66 | -12.5% | 3.11% | 23.75 | -12.2% | 37.54% | 3.14% |
| 345.00 Accessory Electric Equipment | 24.66 | -12.5% | 3.11% | 23.75 | -12.2% | 37.13% | 3.16% |
| 346.00 Miscellaneous Power Plant Equipment | 24.66 | -12.5% | 3.11% | 23.75 | -12.2% | 25.96% | 3.63% |
| Total Ashtabula III | | | 3.11% | 23.75 | -12.2% | 37.42% | 3.15% |
| <u>Langdon</u> | | | | | | | |
| 341.00 Structures and Improvements | 19.01 | -7.6% | 2.64% | 18.05 | -7.6% | 59.88% | 2.64% |
| 344.00 Generators | 19.01 | -7.6% | 2.79% | 18.05 | -7.6% | 56.71% | 2.82% |
| 345.00 Accessory Electric Equipment | 19.01 | -7.6% | 2.69% | 18.06 | -7.6% | 52.58% | 3.05% |
| 346.00 Miscellaneous Power Plant Equipment | 19.02 | -7.6% | 5.99% | 18.07 | -7.6% | -0.50% | 5.98% |
| Total Langdon | | | 2.78% | 18.05 | -7.6% | 56.29% | 2.84% |
| <u>Luverne</u> | | | | | | | |
| 341.00 Structures and Improvements | 20.90 | -10.2% | 2.84% | 19.96 | -10.5% | 53.63% | 2.85% |
| 344.00 Generators | 20.90 | -10.2% | 3.07% | 19.96 | -10.5% | 47.05% | 3.18% |
| 345.00 Accessory Electric Equipment | 20.90 | -10.2% | 2.84% | 19.96 | -10.5% | 53.61% | 2.85% |
| 346.00 Miscellaneous Power Plant Equipment | 20.92 | -10.2% | 5.38% | 19.97 | -10.5% | 2.88% | 5.39% |
| Total Luverne | | | 3.05% | 19.96 | -10.5% | 47.59% | 3.15% |
| <u>Merricourt</u> | | | | | | | |
| 341.00 Structures and Improvements | 31.17 | -8.5% | 3.28% | 30.25 | -8.4% | 9.31% | 3.28% |
| 344.00 Generators | 31.17 | -8.5% | 3.28% | 30.25 | -8.4% | 9.46% | 3.27% |
| 345.00 Accessory Electric Equipment | 31.17 | -8.5% | 3.28% | 30.25 | -8.4% | 9.46% | 3.27% |
| 346.00 Miscellaneous Power Plant Equipment | 31.18 | -8.5% | 3.44% | 30.26 | -8.4% | 0.96% | 3.55% |
| Total Merricourt | | | 3.28% | 30.25 | -8.4% | 9.46% | 3.27% |
| SOLAR PRODUCTION | | | | | | | |
| <u>Jamestown</u> | | | | | | | |
| 341.00 Structures and Improvements | 21.86 | -1.0% | 4.14% | 20.92 | -1.0% | 14.89% | 4.12% |
| 345.00 Accessory Electric Equipment | 21.86 | -1.0% | 4.14% | 20.92 | -1.0% | 14.90% | 4.12% |
| Total Jamestown | | | 4.14% | 20.92 | -1.0% | 14.90% | 4.12% |
| <u>Hoot Lake</u> | | | | | | | |
| 341.00 Structures and Improvements | 35.00 | -12.1% | 3.22% | 33.01 | -12.7% | 0.85% | 3.39% |
| 345.00 Accessory Electric Equipment | 35.00 | -12.1% | 3.22% | 33.01 | -12.7% | 0.85% | 3.39% |
| 346.00 Miscellaneous Power Plant Equipment | 35.00 | -12.1% | 3.22% | 33.01 | -12.7% | 0.85% | 3.39% |
| Total Hoot Lake | | | 3.22% | 33.01 | -12.7% | 0.85% | 3.39% |
| <u>Rush Lake</u> | | | | | | | |
| 341.00 Structures and Improvements | 21.86 | -1.0% | 4.23% | 20.92 | -1.0% | 12.86% | 4.21% |
| 345.00 Accessory Electric Equipment | 21.86 | -1.0% | 4.23% | 20.92 | -1.0% | 12.86% | 4.21% |
| Total Rush Lake | | | 4.23% | 20.92 | -1.0% | 12.86% | 4.21% |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 | | Minnesota | | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|-----------------------|------------|---------------------|---------------------|------------------------|---------------------|------------------------|--------------------|--------------------|-------------|
| | Investment | Allocation | Factor | Total | Minnesota | Total | Minnesota | Total | Minnesota | Minnesota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=H-E | J=I-E | K=J-E |
| INTANGIBLE PLANT | | | | | | | | | | |
| 303.91 Software - 5 Year | \$ 6,502,291 | 0.47811380 | \$ 1,300,458 | \$ 621,767 | \$ 1,300,458 | \$ 621,767 | \$ - | \$ - | \$ - | \$ - |
| 303.92 Software - 10 Year | 29,911,445 | 0.47811380 | 2,991,145 | 1,430,108 | 2,991,145 | 1,430,108 | | | | |
| Total Intangible Plant | \$ 36,413,736 | | \$ 4,291,603 | \$ 2,051,875 | \$ 4,291,603 | \$ 2,051,875 | \$ - | \$ - | \$ - | \$ - |
| STEAM PRODUCTION | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 115,762,535 | 0.49761560 | \$ 2,829,650 | \$ 1,408,078 | \$ 2,825,076 | \$ 1,405,802 | \$ (4,574) | \$ (2,276) | \$ (2,276) | \$ (2,276) |
| 312.00 Boiler Plant Equipment | 308,837,650 | 0.49761560 | 9,617,952 | 4,786,043 | 9,639,443 | 4,796,738 | 21,491 | 10,695 | 10,695 | |
| 312.10 Boiler Plant Equipment - Landfill | 11,200,043 | 0.49761560 | 249,761 | 124,285 | 138,881 | 69,109 | (110,880) | (55,176) | (55,176) | |
| 314.00 Turbogenerator Units | 58,019,031 | 0.49761560 | 1,227,070 | 610,609 | 1,331,147 | 662,399 | 104,077 | 51,790 | 51,790 | |
| 315.00 Accessory Electric Equipment | 33,251,144 | 0.49761560 | 746,871 | 371,654 | 745,983 | 371,213 | (888) | (441) | (441) | |
| 316.00 Miscellaneous Power Plant Equipment | 6,042,253 | 0.49761560 | 187,263 | 93,185 | 188,705 | 93,903 | 1,442 | 718 | 718 | |
| Total Steam Production Plant | \$ 533,112,656 | | \$14,858,567 | \$ 7,393,854 | \$14,869,235 | \$ 7,399,164 | \$ 10,668 | \$ 5,310 | \$ 5,310 | |
| HYDRAULIC PRODUCTION | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,672,033 | 0.49761560 | \$ 5,434 | \$ 2,703 | \$ 26,042 | \$ 12,959 | \$ 20,608 | \$ 10,256 | \$ 10,256 | |
| 332.00 Reservoirs, Dams and Waterways | 6,376,375 | 0.49761560 | 108,370 | 53,926 | 114,665 | 57,060 | 6,295 | 3,134 | 3,134 | |
| 333.00 Water Wheels, Turbines & Generators | 1,051,180 | 0.49761560 | 989 | 491 | 989 | 491 | | | | |
| 334.00 Accessory Electric Equipment | 1,773,378 | 0.49761560 | 30,133 | 14,995 | 31,836 | 15,842 | 1,703 | 847 | 847 | |
| 335.00 Miscellaneous Power Plant Equipment | 670,502 | 0.49761560 | 1,411 | 702 | (358) | (178) | (1,769) | (880) | (880) | |
| Total Hydraulic Production Plant | \$ 11,543,468 | | \$ 146,337 | \$ 72,817 | \$ 173,174 | \$ 86,174 | \$ 26,837 | \$ 13,357 | \$ 13,357 | |
| OTHER PRODUCTION | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 30,950,888 | 0.49728642 | \$ 945,787 | \$ 470,639 | \$ 943,093 | \$ 469,298 | \$ (2,694) | \$ (1,341) | \$ (1,341) | |
| 342.00 Fuel Holders and Accessories | 7,762,795 | 0.49728642 | 239,686 | 119,272 | 226,591 | 112,755 | (13,095) | (6,517) | (6,517) | |
| 343.00 Prime Movers | 140,588,439 | 0.49728642 | 4,317,114 | 2,148,265 | 4,300,235 | 2,139,864 | (16,879) | (8,401) | (8,401) | |
| 345.00 Accessory Electric Equipment | 9,329,465 | 0.49728642 | 278,367 | 138,519 | 272,514 | 135,608 | (5,853) | (2,911) | (2,911) | |
| 346.00 Miscellaneous Power Plant Equipment | 1,906,954 | 0.49728642 | 59,214 | 29,466 | 57,631 | 28,679 | (1,583) | (787) | (787) | |
| Total Other Production Plant | \$ 190,538,541 | | \$ 5,840,168 | \$ 2,906,161 | \$ 5,800,064 | \$ 2,886,204 | \$ (40,104) | \$ (19,957) | \$ (19,957) | |
| WIND PRODUCTION | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 19,987,630 | 0.49728642 | \$ 602,087 | \$ 299,410 | \$ 605,536 | \$ 301,125 | \$ 3,449 | \$ 1,715 | \$ 1,715 | |
| 344.00 Generators | 547,928,855 | 0.49728642 | 16,819,301 | 8,364,010 | 16,975,339 | 8,441,605 | 156,038 | 77,595 | 77,595 | |
| 345.00 Accessory Electric Equipment | 44,943,664 | 0.49728642 | 1,352,799 | 672,729 | 1,384,951 | 688,718 | 32,152 | 15,989 | 15,989 | |
| 346.00 Miscellaneous Power Plant Equipment | 653,553 | 0.49728642 | 29,937 | 14,888 | 31,154 | 15,493 | 1,217 | 605 | 605 | |
| Total Wind Production Plant | \$ 613,513,702 | | \$18,804,124 | \$ 9,351,037 | \$18,996,980 | \$ 9,446,941 | \$ 192,856 | \$ 95,904 | \$ 95,904 | |
| SOLAR PRODUCTION | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,868,482 | 0.95869483 | \$ 60,459 | \$ 59,815 | \$ 63,578 | \$ 62,937 | \$ 3,119 | \$ 3,122 | \$ 3,122 | |
| 345.00 Accessory Electric Equipment | 57,267,142 | 0.95869483 | 1,846,835 | 1,840,650 | 1,943,631 | 1,937,476 | 96,796 | 96,826 | 96,826 | |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 0.95869483 | 19,726 | 19,726 | 20,768 | 20,768 | 1,042 | 1,042 | 1,042 | |
| Total Solar Production Plant | \$ 59,748,238 | | \$ 1,927,020 | \$ 1,920,191 | \$ 2,027,977 | \$ 2,021,181 | \$ 100,957 | \$ 100,990 | \$ 100,990 | |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | Minnesota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|---|---------------------------------|-----------------------------------|------------------------|---------------------|------------------------|---------------------|------------------|------------------|
| | | | Total | Minnesota | Total | Minnesota | Total | Minnesota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| TRANSMISSION PLANT | | | | | | | | |
| 353.00 Station Equipment | \$ 189,552,423 | 0.52084800 | \$ 2,957,018 | \$ 1,540,157 | \$ 2,938,063 | \$ 1,530,284 | \$ (18,955) | \$ (9,873) |
| 354.00 Towers and Fixtures | 197,050,600 | 0.52084800 | 2,699,593 | 1,406,078 | 2,699,593 | 1,406,078 | | |
| 355.00 Poles and Fixtures | 174,132,190 | 0.52084800 | 3,012,487 | 1,569,048 | 3,047,313 | 1,587,187 | 34,826 | 18,139 |
| 356.00 Overhead Conductors and Devices | 193,157,663 | 0.52084800 | 2,935,996 | 1,529,208 | 2,955,312 | 1,539,268 | 19,316 | 10,060 |
| 358.00 Underground Conductors and Devices | 77,461 | 0.52084800 | 1,084 | 565 | 201 | 105 | (883) | (460) |
| Total Transmission Plant | \$ 753,970,337 | | \$11,606,178 | \$ 6,045,056 | \$11,640,482 | \$ 6,062,922 | \$ 34,304 | \$ 17,866 |
| DISTRIBUTION PLANT | | | | | | | | |
| 362.00 Station Equipment | \$ 100,507,890 | 0.44229070 | \$ 2,130,767 | \$ 942,418 | \$ 2,120,716 | \$ 937,973 | \$ (10,051) | \$ (4,445) |
| 364.00 Poles, Towers and Fixtures | 90,210,134 | 0.44229070 | 2,958,892 | 1,308,690 | 2,967,913 | 1,312,660 | 9,021 | 3,990 |
| 365.00 Overhead Conductors and Devices | 63,365,052 | 0.44229070 | 1,311,657 | 580,134 | 1,330,666 | 588,541 | 19,009 | 8,407 |
| 367.00 Underground Conductors and Devices | 134,078,350 | 0.44229070 | 2,426,818 | 1,073,359 | 2,507,265 | 1,108,940 | 80,447 | 35,581 |
| 368.00 Line Transformers | 135,607,045 | 0.44229070 | 2,196,834 | 971,639 | 2,196,834 | 971,639 | | |
| 369.00 Overhead Services | 14,304,116 | 0.44229070 | 1,142,899 | 505,494 | 1,145,760 | 506,759 | 2,861 | 1,265 |
| 369.10 Underground Services | 51,993,089 | 0.44229070 | 1,445,408 | 639,291 | 1,445,408 | 639,291 | | |
| 370.00 Meters | 28,368,846 | 0.44229070 | 848,228 | 375,163 | 828,370 | 366,380 | (19,858) | (8,783) |
| 370.05 Smart Meters | 921,313 | 0.44229070 | 47,816 | 21,149 | 48,000 | 21,230 | 184 | 81 |
| 370.10 Load Management Switches | 8,899,439 | 0.44229070 | 13,349 | 5,904 | 4,450 | 1,968 | (8,899) | (3,936) |
| 371.10 Electric Vehicle Charging Stations | 26,200 | 0.44229070 | 2,620 | 1,159 | 2,620 | 1,159 | | |
| 371.20 Other Private Lighting | 10,185,838 | 0.44229070 | 583,649 | 258,143 | 579,574 | 256,340 | (4,075) | (1,803) |
| 373.00 Street Lighting and Signal Systems | 14,586,957 | 0.44229070 | 851,878 | 376,778 | 872,300 | 385,810 | 20,422 | 9,032 |
| Total Distribution Plant | \$ 653,054,289 | | \$15,960,815 | \$ 7,059,321 | \$16,049,876 | \$ 7,098,710 | \$ 89,061 | \$ 39,389 |
| GENERAL PLANT | | | | | | | | |
| Depreciable | | | | | | | | |
| 390.00 Structures and Improvements | \$ 26,108,301 | 0.47811380 | \$ 519,555 | \$ 248,406 | \$ 511,723 | \$ 244,662 | \$ (7,832) | \$ (3,744) |
| 390.10 General Office Buildings | 6,451,486 | 0.47811380 | 47,096 | 22,517 | 47,741 | 22,826 | 645 | 309 |
| 390.20 Fleet Service Center Building | 896,880 | 0.47811380 | (12,287) | (5,875) | (3,229) | (1,544) | 9,058 | 4,331 |
| 390.25 Fleet Service Center - Jamestown | 2,154,593 | 0.47811380 | (23,270) | (11,126) | (23,916) | (11,435) | (646) | (309) |
| 390.30 Central Stores Building | 4,494,284 | 0.47811380 | (48,988) | (23,422) | (37,303) | (17,835) | 11,685 | 5,587 |
| 396.00 Power Operated Equipment | 1,749,199 | 0.47811380 | 77,490 | 37,049 | 75,740 | 36,212 | (1,750) | (837) |
| 397.40 Communication Towers | 1,922,046 | 0.47811380 | 32,483 | 15,531 | 32,290 | 15,438 | (193) | (93) |
| Total Depreciable | \$ 43,776,789 | | \$ 592,079 | \$ 283,080 | \$ 603,046 | \$ 288,324 | \$ 10,967 | \$ 5,244 |
| Amortizable | | | | | | | | |
| 391.00 Office Furniture | \$ 471,009 | 0.47811380 | \$ 31,416 | \$ 15,020 | \$ 31,416 | \$ 15,020 | \$ - | \$ - |
| 391.10 Office Equipment | 186,048 | 0.47811380 | 18,605 | 8,895 | 18,605 | 8,895 | | |
| 391.20 Duplicating Equipment | 835,707 | 0.47811380 | 83,571 | 39,966 | 83,571 | 39,966 | | |
| 391.50 Computer Systems | 3,342,987 | 0.47811380 | 688,597 | 319,665 | 668,597 | 319,665 | | |
| 391.60 Computer Related Equipment | 4,539,752 | 0.47811380 | 907,950 | 434,103 | 907,950 | 434,103 | | |
| 394.00 Tools, Shop and Garage Equipment | 5,451,853 | 0.47811380 | 363,639 | 173,861 | 363,639 | 173,861 | | |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | Minnesota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|-----------------------------------|------------------------|---------------------|------------------------|---------------------|---------------------|--------------------|
| | | | Total | Minnesota E=C'D | Total | Minnesota G=C'F | Total | Minnesota H=F,D |
| A | B | C | D | E=C'D | F | G=C'F | H=F,D | I=H-E |
| 394.20 Automated Meter Reading Equipment | 401,984 | 0.47811380 | 26,812 | 12,819 | 26,812 | 12,819 | | |
| 397.00 Communication Equipment | 4,869,774 | 0.47811380 | 324,814 | 155,298 | 324,814 | 155,298 | | |
| 397.10 Radio Telecommunication Equipment | 464,016 | 0.47811380 | 46,402 | 22,185 | 46,402 | 22,185 | | |
| 397.20 Microwave Equipment | 3,920,364 | 0.47811380 | 261,488 | 125,021 | 261,488 | 125,021 | | |
| 397.30 Radio Load Control Equipment | 165,980 | 0.47811380 | 16,598 | 7,936 | 16,598 | 7,936 | | |
| Total Amortizable | \$ 24,649,474 | | \$ 2,749,892 | \$ 1,314,759 | \$ 2,749,892 | \$ 1,314,759 | \$ - | \$ - |
| Total General Plant | \$ 68,426,263 | | \$ 3,341,971 | \$ 1,597,839 | \$ 3,352,938 | \$ 1,603,083 | \$ 10,967 | \$ 5,244 |
| TOTAL UTILITY | \$2,920,321,210 | | \$76,776,783 | \$38,398,151 | \$77,202,329 | \$38,656,254 | \$ 425,546 | \$ 258,103 |
| STEAM PRODUCTION | | | | | | | | |
| Big Stone | | | | | | | | |
| 311.00 Structures and Improvements | \$ 80,758,219 | 0.49761560 | \$ 2,245,078 | \$ 1,117,186 | \$ 2,237,003 | \$ 1,113,168 | \$ (8,075) | \$ (4,018) |
| 312.00 Boiler Plant Equipment | 201,385,686 | 0.49761560 | 7,028,360 | 3,497,422 | 7,028,360 | 3,497,422 | | |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 31,809,484 | 0.49761560 | 553,485 | 275,423 | 578,933 | 288,086 | 25,448 | 12,663 |
| 315.00 Accessory Electric Equipment | 21,066,041 | 0.49761560 | 528,758 | 263,118 | 526,651 | 262,070 | (2,107) | (1,048) |
| 316.00 Miscellaneous Power Plant Equipment | 3,617,809 | 0.49761560 | 98,043 | 48,788 | 100,213 | 49,868 | 2,170 | 1,080 |
| Total Big Stone | \$ 338,637,239 | | \$10,453,724 | \$ 5,201,937 | \$10,471,160 | \$ 5,210,614 | \$ 17,436 | \$ 8,677 |
| Hoot Lake Units 2 and 3 | | | | | | | | |
| 311.00 Structures and Improvements | \$ - | | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - |
| 312.00 Boiler Plant Equipment | | | | | | | | |
| 312.10 Boiler Plant Equipment - Landfill | 11,200,043 | 0.49761560 | 249,761 | 124,285 | 138,881 | 69,109 | (110,880) | (55,176) |
| 314.00 Turbogenerator Units | | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | | |
| Total Hoot Lake Units 2 and 3 | \$ 11,200,043 | | \$ 249,761 | \$ 124,285 | \$ 138,881 | \$ 69,109 | \$ (110,880) | \$ (55,176) |
| Coyote | | | | | | | | |
| 311.00 Structures and Improvements | \$ 35,004,316 | 0.49761560 | \$ 584,572 | \$ 290,892 | \$ 588,073 | \$ 292,634 | \$ 3,501 | \$ 1,742 |
| 312.00 Boiler Plant Equipment | 107,451,964 | 0.49761560 | 2,589,592 | 1,288,621 | 2,611,083 | 1,299,316 | 21,491 | 10,695 |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 26,209,547 | 0.49761560 | 673,585 | 335,186 | 752,214 | 374,313 | 78,629 | 39,127 |
| 315.00 Accessory Electric Equipment | 12,185,103 | 0.49761560 | 218,113 | 108,536 | 219,332 | 109,143 | 1,219 | 607 |
| 316.00 Miscellaneous Power Plant Equipment | 2,424,444 | 0.49761560 | 89,220 | 44,397 | 88,492 | 44,035 | (728) | (362) |
| Total Coyote | \$ 183,275,374 | | \$ 4,155,082 | \$ 2,087,632 | \$ 4,259,194 | \$ 2,119,441 | \$ 104,112 | \$ 51,809 |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | Minnesota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|-----------------------------------|------------------------|------------------|------------------------|------------------|------------------|-----------------|
| | | | Total | Minnesota | Total | Minnesota | Total | Minnesota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| HYDRAULIC PRODUCTION | | | | | | | | |
| Hoot Lake | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,422,555 | 0.49761560 | \$ 427 | \$ 212 | \$ 21,054 | \$ 10,477 | \$ 20,627 | \$ 10,265 |
| 332.00 Reservoirs, Dams and Waterways | 390,152 | 0.49761560 | 6,086 | 3,028 | 2,029 | 1,010 | (4,057) | (2,018) |
| 333.00 Water Wheels, Turbines & Generators | 104,195 | 0.49761560 | 31 | 15 | 31 | 15 | | |
| 334.00 Accessory Electric Equipment | 1,216,302 | 0.49761560 | 29,556 | 14,708 | 31,259 | 15,555 | 1,703 | 847 |
| 335.00 Miscellaneous Power Plant Equipment | 285,348 | 0.49761560 | 656 | 326 | (1,113) | (554) | (1,769) | (880) |
| Total Hoot Lake | \$ 3,418,552 | | \$ 36,756 | \$ 18,289 | \$ 53,260 | \$ 26,503 | \$ 16,504 | \$ 8,214 |
| Wright | | | | | | | | |
| 331.00 Structures and Improvements | \$ 20,080 | 0.49761560 | \$ 40 | \$ 20 | \$ 40 | \$ 20 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 973,942 | 0.49761560 | 2,045 | 1,018 | 4,091 | 2,036 | 2,046 | 1,018 |
| 333.00 Water Wheels, Turbines & Generators | 545,392 | 0.49761560 | 436 | 217 | 436 | 217 | | |
| 334.00 Accessory Electric Equipment | 202,552 | 0.49761560 | 223 | 111 | 223 | 111 | | |
| 335.00 Miscellaneous Power Plant Equipment | 115,218 | 0.49761560 | 196 | 98 | 196 | 98 | | |
| Total Wright | \$ 1,857,184 | | \$ 2,940 | \$ 1,464 | \$ 4,986 | \$ 2,482 | \$ 2,046 | \$ 1,018 |
| Pisgah | | | | | | | | |
| 331.00 Structures and Improvements | \$ 13,172 | 0.49761560 | \$ 34 | \$ 17 | \$ 34 | \$ 17 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 2,189,300 | 0.49761560 | 70,933 | 35,297 | 70,277 | 34,971 | (656) | (326) |
| 333.00 Water Wheels, Turbines & Generators | 159,732 | 0.49761560 | 224 | 111 | 224 | 111 | | |
| 334.00 Accessory Electric Equipment | 102,487 | 0.49761560 | 133 | 66 | 133 | 66 | | |
| 335.00 Miscellaneous Power Plant Equipment | 62,744 | 0.49761560 | 151 | 75 | 151 | 75 | | |
| Total Pisgah | \$ 2,527,435 | | \$ 71,475 | \$ 35,566 | \$ 70,819 | \$ 35,240 | \$ (656) | \$ (326) |
| Dayton Hollow | | | | | | | | |
| 331.00 Structures and Improvements | \$ 181,086 | 0.49761560 | \$ 4,926 | \$ 2,451 | \$ 4,907 | \$ 2,442 | \$ (19) | \$ (9) |
| 332.00 Reservoirs, Dams and Waterways | 2,118,681 | 0.49761560 | 28,390 | 14,127 | 34,746 | 17,290 | 6,356 | 3,163 |
| 333.00 Water Wheels, Turbines & Generators | 226,751 | 0.49761560 | 295 | 147 | 295 | 147 | | |
| 334.00 Accessory Electric Equipment | 193,342 | 0.49761560 | 174 | 87 | 174 | 87 | | |
| 335.00 Miscellaneous Power Plant Equipment | 110,889 | 0.49761560 | 244 | 121 | 244 | 121 | | |
| Total Dayton Hollow | \$ 2,830,749 | | \$ 34,029 | \$ 16,933 | \$ 40,366 | \$ 20,087 | \$ 6,337 | \$ 3,154 |
| Taplin Gorge | | | | | | | | |
| 331.00 Structures and Improvements | \$ 35,140 | 0.49761560 | \$ 7 | \$ 3 | \$ 7 | \$ 3 | \$ - | \$ - |
| 332.00 Reservoirs, Dams and Waterways | 704,300 | 0.49761560 | 916 | 456 | 3,522 | 1,753 | 2,606 | 1,297 |
| 333.00 Water Wheels, Turbines & Generators | 15,110 | 0.49761560 | 3 | 1 | 3 | 1 | | |
| 334.00 Accessory Electric Equipment | 58,695 | 0.49761560 | 47 | 23 | 47 | 23 | | |
| 335.00 Miscellaneous Power Plant Equipment | 96,303 | 0.49761560 | 164 | 82 | 164 | 82 | | |
| Total Taplin Gorge | \$ 909,548 | | \$ 1,137 | \$ 565 | \$ 3,743 | \$ 1,862 | \$ 2,606 | \$ 1,297 |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | Minnesota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|--|---------------------------------|-----------------------------------|------------------------|-------------------|------------------------|-------------------|--------------------|--------------------|
| | | | Total | Minnesota | Total | Minnesota | Total | Minnesota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| OTHER PRODUCTION | | | | | | | | |
| Jamestown | | | | | | | | |
| 341.00 Structures and Improvements | \$ 311,512 | 0.49761560 | \$ 6,592 | \$ 3,281 | \$ 3,988 | \$ 1,985 | \$ (2,604) | \$ (1,296) |
| 342.00 Fuel Holders and Accessories | 415,964 | 0.49761560 | 12,159 | 6,051 | 7,259 | 3,612 | (4,900) | (2,439) |
| 343.00 Prime Movers | 7,168,816 | 0.49761560 | 125,153 | 62,279 | 87,871 | 43,726 | (37,282) | (18,553) |
| 345.00 Accessory Electric Equipment | 227,590 | 0.49761560 | 5,965 | 2,968 | 3,583 | 1,783 | (2,382) | (1,185) |
| 346.00 Miscellaneous Power Plant Equipment | 88,665 | 0.49761560 | 3,183 | 1,584 | 1,888 | 940 | (1,299) | (644) |
| Total Jamestown | \$ 8,212,547 | | \$ 153,052 | \$ 76,163 | \$ 104,589 | \$ 52,046 | \$ (48,463) | \$ (24,117) |
| Jamestown Unit 1 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 286,659 | 0.49761560 | \$ 5,819 | \$ 2,896 | \$ 3,526 | \$ 1,755 | \$ (2,293) | \$ (1,141) |
| 342.00 Fuel Holders and Accessories | 379,195 | 0.49761560 | 11,641 | 5,793 | 6,939 | 3,453 | (4,702) | (2,340) |
| 343.00 Prime Movers | 3,139,011 | 0.49761560 | 63,094 | 31,397 | 43,946 | 21,868 | (19,148) | (9,529) |
| 345.00 Accessory Electric Equipment | 155,272 | 0.49761560 | 2,826 | 1,406 | 1,724 | 858 | (1,102) | (548) |
| 346.00 Miscellaneous Power Plant Equipment | 85,462 | 0.49761560 | 3,188 | 1,586 | 1,889 | 940 | (1,299) | (646) |
| Total Jamestown Unit 1 | \$ 4,045,599 | | \$ 86,568 | \$ 43,078 | \$ 58,024 | \$ 28,874 | \$ (28,544) | \$ (14,204) |
| Jamestown Unit 2 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 24,853 | 0.49761560 | \$ 773 | \$ 385 | \$ 462 | \$ 230 | \$ (311) | \$ (155) |
| 342.00 Fuel Holders and Accessories | 36,769 | 0.49761560 | 518 | 258 | 320 | 159 | (198) | (99) |
| 343.00 Prime Movers | 4,029,805 | 0.49761560 | 62,059 | 30,882 | 43,925 | 21,858 | (18,134) | (9,024) |
| 345.00 Accessory Electric Equipment | 72,318 | 0.49761560 | 3,139 | 1,562 | 1,859 | 925 | (1,280) | (637) |
| 346.00 Miscellaneous Power Plant Equipment | 3,203 | 0.49761560 | (5) | (2) | (1) | (1) | 4 | 2 |
| Total Jamestown Unit 2 | \$ 4,166,948 | | \$ 66,484 | \$ 33,085 | \$ 46,565 | \$ 23,172 | \$ (19,919) | \$ (9,913) |
| Lake Preston | | | | | | | | |
| 341.00 Structures and Improvements | \$ 279,726 | 0.49761560 | \$ 9,483 | \$ 4,719 | \$ 5,958 | \$ 2,965 | \$ (3,525) | \$ (1,754) |
| 342.00 Fuel Holders and Accessories | 328,705 | 0.49761560 | 5,818 | 2,895 | 3,517 | 1,750 | (2,301) | (1,145) |
| 343.00 Prime Movers | 3,477,302 | 0.49761560 | 55,289 | 27,513 | 44,857 | 22,322 | (10,432) | (5,191) |
| 345.00 Accessory Electric Equipment | 400,094 | 0.49761560 | 6,642 | 3,305 | 4,041 | 2,011 | (2,601) | (1,294) |
| 346.00 Miscellaneous Power Plant Equipment | 21,322 | 0.49761560 | 213 | 106 | 136 | 68 | (77) | (38) |
| Total Lake Preston | \$ 4,507,149 | | \$ 77,445 | \$ 38,538 | \$ 58,509 | \$ 29,116 | \$ (18,936) | \$ (9,422) |
| Solway Combustion Turbine | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,907,301 | 0.49761560 | \$ 158,506 | \$ 78,875 | \$ 161,941 | \$ 80,584 | \$ 3,435 | \$ 1,709 |
| 342.00 Fuel Holders and Accessories | 1,104,855 | 0.49761560 | 42,537 | 21,167 | 37,234 | 18,528 | (5,303) | (2,639) |
| 343.00 Prime Movers | 21,914,301 | 0.49761560 | 863,423 | 429,653 | 905,061 | 450,372 | 41,638 | 20,719 |
| 345.00 Accessory Electric Equipment | 1,310,193 | 0.49761560 | 41,795 | 20,798 | 41,664 | 20,733 | (131) | (65) |
| 346.00 Miscellaneous Power Plant Equipment | 318,649 | 0.49761560 | 11,025 | 5,486 | 10,962 | 5,455 | (63) | (31) |
| Total Solway Combustion Turbine | \$ 29,555,299 | | \$ 1,117,286 | \$ 555,979 | \$ 1,156,862 | \$ 575,672 | \$ 39,576 | \$ 19,693 |

Statement B

OTTER TAIL POWER COMPANY

Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description | 12/31/23 Plant Investment | Minnesota Allocation Factor | Current Annual Accrual | | Updated Annual Accrual | | Difference | |
|---|---------------------------------|-----------------------------------|------------------------|---------------------|------------------------|---------------------|--------------------|--------------------|
| | | | Total | Minnesota | Total | Minnesota | Total | Minnesota |
| A | B | C | D | E=C*D | F | G=C*F | H=F-D | I=G-E |
| Astoria Station Combustion Turbine | | | | | | | | |
| 341.00 Structures and Improvements | \$ 25,452,349 | 0.49761560 | \$ 771,206 | \$ 383,764 | \$ 771,206 | \$ 383,764 | \$ - | \$ - |
| 342.00 Fuel Holders and Accessories | 5,913,271 | 0.49761560 | 178,172 | 89,159 | 178,581 | 88,865 | (591) | (294) |
| 343.00 Prime Movers | 108,028,020 | 0.49761560 | 3,273,249 | 1,628,820 | 3,262,446 | 1,623,444 | (10,803) | (5,376) |
| 345.00 Accessory Electric Equipment | 7,391,588 | 0.49761560 | 223,965 | 111,448 | 223,226 | 111,061 | (739) | (367) |
| 346.00 Miscellaneous Power Plant Equipment | 1,478,318 | 0.49761560 | 44,793 | 22,290 | 44,645 | 22,216 | (148) | (74) |
| Total Astoria Station Combustion Turbine | \$ 148,263,546 | | \$ 4,492,385 | \$ 2,235,481 | \$ 4,480,104 | \$ 2,229,370 | \$ (12,281) | \$ (6,111) |
| WIND PRODUCTION | | | | | | | | |
| Ashtabula | | | | | | | | |
| 341.00 Structures and Improvements | \$ 3,248,290 | 0.49728642 | \$ 85,755 | \$ 42,645 | \$ 85,755 | \$ 42,645 | \$ - | \$ - |
| 344.00 Generators | 105,926,168 | 0.49728642 | 2,923,562 | 1,453,848 | 2,987,118 | 1,485,453 | 63,556 | 31,605 |
| 345.00 Accessory Electric Equipment | 6,479,774 | 0.49728642 | 173,658 | 86,358 | 173,658 | 86,358 | | |
| 346.00 Miscellaneous Power Plant Equipment | 103,431 | 0.49728642 | 5,823 | 2,896 | 5,813 | 2,891 | (10) | (5) |
| Total Ashtabula | \$ 115,757,663 | | \$ 3,188,798 | \$ 1,585,747 | \$ 3,252,344 | \$ 1,617,347 | \$ 63,546 | \$ 31,600 |
| Ashtabula III | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,027,787 | 0.49728642 | \$ 125,264 | \$ 62,292 | \$ 128,486 | \$ 63,894 | \$ 3,222 | \$ 1,602 |
| 344.00 Generators | 70,688,754 | 0.49728642 | 2,198,420 | 1,093,244 | 2,219,627 | 1,103,790 | 21,207 | 10,546 |
| 345.00 Accessory Electric Equipment | 7,024,753 | 0.49728642 | 218,470 | 108,642 | 221,982 | 110,389 | 3,512 | 1,747 |
| 346.00 Miscellaneous Power Plant Equipment | 222,806 | 0.49728642 | 6,929 | 3,446 | 8,088 | 4,022 | 1,159 | 576 |
| Total Ashtabula III | \$ 81,964,100 | | \$ 2,549,083 | \$ 1,267,624 | \$ 2,578,183 | \$ 1,282,095 | \$ 29,100 | \$ 14,471 |
| Langdon | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,484,069 | 0.49728642 | \$ 65,579 | \$ 32,612 | \$ 65,579 | \$ 32,612 | \$ - | \$ - |
| 344.00 Generators | 69,539,883 | 0.49728642 | 1,940,163 | 964,817 | 1,961,025 | 975,191 | 20,862 | 10,374 |
| 345.00 Accessory Electric Equipment | 8,327,422 | 0.49728642 | 224,008 | 111,396 | 253,986 | 126,304 | 29,978 | 14,908 |
| 346.00 Miscellaneous Power Plant Equipment | 118,790 | 0.49728642 | 7,116 | 3,539 | 7,104 | 3,533 | (12) | (6) |
| Total Langdon | \$ 80,470,164 | | \$ 2,236,866 | \$ 1,112,364 | \$ 2,287,694 | \$ 1,137,640 | \$ 50,828 | \$ 25,276 |
| Luverne | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,266,581 | 0.49728642 | \$ 64,371 | \$ 32,011 | \$ 64,598 | \$ 32,124 | \$ 227 | \$ 113 |
| 344.00 Generators | 67,158,480 | 0.49728642 | 2,061,765 | 1,025,288 | 2,135,640 | 1,062,025 | 73,875 | 36,737 |
| 345.00 Accessory Electric Equipment | 4,863,837 | 0.49728642 | 138,133 | 68,692 | 138,619 | 68,933 | 486 | 241 |
| 346.00 Miscellaneous Power Plant Equipment | 149,262 | 0.49728642 | 8,030 | 3,993 | 8,045 | 4,001 | 15 | 8 |
| Total Luverne | \$ 74,438,160 | | \$ 2,272,299 | \$ 1,129,984 | \$ 2,346,902 | \$ 1,167,083 | \$ 74,603 | \$ 37,099 |
| Merricourt | | | | | | | | |
| 341.00 Structures and Improvements | \$ 7,960,903 | 0.49728642 | \$ 261,118 | \$ 129,850 | \$ 261,118 | \$ 129,850 | \$ - | \$ - |
| 344.00 Generators | 234,615,570 | 0.49728642 | 7,695,391 | 3,826,813 | 7,671,929 | 3,815,146 | (23,462) | (11,667) |
| 345.00 Accessory Electric Equipment | 18,247,878 | 0.49728642 | 598,530 | 297,641 | 596,706 | 296,734 | (1,824) | (907) |
| 346.00 Miscellaneous Power Plant Equipment | 59,264 | 0.49728642 | 2,039 | 1,014 | 2,104 | 1,046 | 65 | 32 |
| Total Merricourt | \$ 260,883,615 | | \$ 8,557,078 | \$ 4,255,318 | \$ 8,531,857 | \$ 4,242,776 | \$ (25,221) | \$ (12,542) |

Statement B

OTTER TAIL POWER COMPANY
Comparison of Current and Updated Accruals
Current: VG Procedure / RL Technique
Proposed: VG Procedure / RL Technique

| Account Description A | 12/31/23 Plant Investment B | Minnesota Allocation Factor C | Current Annual Accrual D | | Updated Annual Accrual F | | Difference H=F-D | | |
|--|--------------------------------------|--|-----------------------------|--------------------|-----------------------------|--------------------|---------------------|--------------------|--|
| | | | Total | Minnesota E=C*D | Total | Minnesota G=C*F | Total | Minnesota H=G-E | |
| SOLAR PRODUCTION | | | | | | | | | |
| Jamestown | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 17,105 | 0.49728642 | \$ 708 | \$ 352 | \$ 705 | \$ 351 | \$ (3) | \$ (1) | |
| 345.00 Accessory Electric Equipment | 151,476 | 0.49728642 | 6,271 | 3,118 | 6,241 | 3,104 | (30) | (14) | |
| Total Jamestown | 168,581 | | 6,979 | 3,470 | 6,946 | 3,455 | (33) | (15) | |
| Hoot Lake | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,837,841 | 1.00000000 | \$ 59,178 | \$ 59,178 | \$ 62,303 | \$ 62,303 | \$ 3,125 | \$ 3,125 | |
| 345.00 Accessory Electric Equipment | 56,973,080 | 1.00000000 | 1,834,533 | 1,834,533 | 1,931,387 | 1,931,387 | 96,854 | 96,854 | |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 1.00000000 | 19,726 | 19,726 | 20,768 | 20,768 | 1,042 | 1,042 | |
| Total Hoot Lake | 59,423,535 | | 1,913,437 | 1,913,437 | 2,014,458 | 2,014,458 | 101,021 | 101,021 | |
| Rush Lake | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 13,536 | 0.49728642 | \$ 573 | \$ 285 | \$ 570 | \$ 283 | \$ (3) | \$ (2) | |
| 345.00 Accessory Electric Equipment | 142,586 | 0.49728642 | 6,031 | 2,999 | 6,003 | 2,985 | (28) | (14) | |
| Total Rush Lake | 156,122 | | 6,604 | 3,284 | 6,573 | 3,268 | (31) | (16) | |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve Amount C | | Computed Reserve Amount E | | Reserve Imbalance Amount G-C-E | |
|--|--------------------------|----------------|---------------------------------|----------------|---------------------------------|----------------|--------------------------------------|---------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio H=G/C | Amount | Multiple |
| INTANGIBLE PLANT | | | | | | | | |
| 303.91 Software - 5 Year | \$ 6,502,291 | 55.58% | \$ 3,614,234 | 58.55% | \$ 3,807,253 | 58.55% | \$ (193,019) | -5.34% |
| 303.92 Software - 10 Year | 29,911,445 | 38.20% | 11,426,083 | 38.20% | 10,648,327 | 35.60% | 777,756 | 6.81% |
| Total Intangible Plant | \$ 36,413,736 | 41.30% | \$ 15,040,317 | 41.30% | \$ 14,455,580 | 39.70% | \$ 584,737 | 3.89% |
| STEAM PRODUCTION | | | | | | | | |
| 311.00 Structures and Improvements | \$ 115,762,535 | 55.63% | \$ 64,400,971 | 55.63% | \$ 56,051,560 | 48.42% | \$ 8,349,411 | 12.96% |
| 312.00 Boiler Plant Equipment | 308,837,650 | 42.47% | 131,154,515 | 42.47% | 129,765,046 | 42.02% | 1,389,469 | 1.06% |
| 312.10 Boiler Plant Equipment - Landfill | 11,200,043 | 63.52% | 7,113,891 | 63.52% | 2,547,611 | 22.75% | 4,566,280 | 64.19% |
| 314.00 Turbogenerator Units | 58,019,031 | 63.01% | 36,559,592 | 63.01% | 31,394,010 | 54.11% | 5,165,582 | 14.13% |
| 315.00 Accessory Electric Equipment | 33,251,144 | 60.85% | 20,234,262 | 60.85% | 17,340,906 | 52.15% | 2,893,357 | 14.30% |
| 316.00 Miscellaneous Power Plant Equipment | 6,042,253 | 45.60% | 2,755,382 | 45.60% | 2,727,154 | 45.13% | 28,227 | 1.02% |
| Total Steam Production Plant | \$ 533,112,656 | 49.19% | \$ 262,218,613 | 49.19% | \$ 239,626,287 | 44.99% | \$ 22,392,326 | 8.54% |
| HYDRAULIC PRODUCTION | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,672,033 | 43.09% | \$ 720,435 | 43.09% | \$ 274,583 | 16.42% | \$ 445,852 | 61.89% |
| 332.00 Reservoirs, Dams and Waterways | 6,376,375 | 34.16% | 2,178,156 | 34.16% | 437,705 | 6.86% | 1,740,451 | 79.90% |
| 333.00 Water Wheels, Turbines & Generators | 1,051,180 | 96.63% | 1,015,803 | 96.63% | 277,063 | 26.36% | 738,740 | 72.72% |
| 334.00 Accessory Electric Equipment | 1,773,378 | 34.14% | 605,459 | 34.14% | 257,745 | 14.53% | 347,714 | 57.43% |
| 335.00 Miscellaneous Power Plant Equipment | 670,502 | 101.96% | 683,629 | 101.96% | 175,718 | 26.21% | 507,911 | 74.30% |
| Total Hydraulic Production Plant | \$ 11,543,468 | 45.08% | \$ 5,203,483 | 45.08% | \$ 1,422,814 | 12.33% | \$ 3,780,668 | 72.66% |
| OTHER PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 30,950,888 | 16.67% | \$ 5,159,757 | 16.67% | \$ 4,819,887 | 15.57% | \$ 339,871 | 6.59% |
| 342.00 Fuel Holders and Accessories | 7,762,795 | 21.77% | 1,689,899 | 21.77% | 1,480,701 | 19.07% | 209,197 | 12.38% |
| 343.00 Prime Movers | 140,588,439 | 19.40% | 27,275,115 | 19.40% | 26,068,204 | 18.54% | 1,206,911 | 4.42% |
| 345.00 Accessory Electric Equipment | 9,329,465 | 20.16% | 1,881,166 | 20.16% | 1,721,470 | 18.45% | 159,696 | 8.49% |
| 346.00 Miscellaneous Power Plant Equipment | 1,906,954 | 19.44% | 370,697 | 19.44% | 337,901 | 17.72% | 32,796 | 8.85% |
| Total Other Production Plant | \$ 190,538,541 | 19.09% | \$ 36,376,634 | 19.09% | \$ 34,428,163 | 18.07% | \$ 1,948,471 | 5.36% |
| WIND PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 19,987,630 | 33.70% | \$ 6,736,318 | 33.70% | \$ 4,687,572 | 23.45% | \$ 2,048,746 | 30.41% |
| 344.00 Generators | 547,928,855 | 32.08% | 175,764,948 | 32.08% | 136,541,776 | 24.92% | 39,223,173 | 22.32% |
| 345.00 Accessory Electric Equipment | 44,943,664 | 33.18% | 14,913,820 | 33.18% | 10,911,339 | 24.28% | 4,002,481 | 26.84% |
| 346.00 Miscellaneous Power Plant Equipment | 653,553 | 9.42% | 61,565 | 9.42% | 83,690 | 12.81% | (22,124) | -35.94% |
| Total Wind Production Plant | \$ 613,513,702 | 32.19% | \$ 197,476,651 | 32.19% | \$ 152,224,376 | 24.81% | \$ 45,252,276 | 22.92% |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve C | | Computed Reserve E | | Reserve Imbalance G-C-E | |
|--|-----------------------|----------------|-----------------------|----------------|-----------------------|----------------|----------------------------|----------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio H=G/C | Amount | Multiple |
| SOLAR PRODUCTION | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,868,482 | 1.07% | \$ 19,903 | 1.07% | \$ 32,694 | 1.75% | \$ (12,791) | -64.27% |
| 345.00 Accessory Electric Equipment | 57,267,142 | 0.92% | 524,941 | 0.92% | 923,034 | 1.61% | (398,093) | -75.84% |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 0.85% | 5,205 | 0.85% | 9,489 | 1.55% | (4,284) | -82.31% |
| Total Solar Production Plant | \$ 59,748,238 | 0.92% | \$ 550,049 | 0.92% | \$ 965,217 | 1.62% | \$ (415,168) | -75.48% |
| TRANSMISSION PLANT | | | | | | | | |
| 353.00 Station Equipment | \$ 189,552,423 | 18.63% | \$ 35,319,029 | 18.63% | \$ 34,075,293 | 17.98% | \$ 1,243,737 | 3.52% |
| 354.00 Towers and Fixtures | 197,050,600 | 11.21% | 22,097,097 | 11.21% | 21,025,299 | 10.67% | 1,071,798 | 4.85% |
| 355.00 Poles and Fixtures | 174,132,190 | 35.46% | 61,745,653 | 35.46% | 53,625,700 | 30.80% | 8,119,953 | 13.15% |
| 356.00 Overhead Conductors and Devices | 193,157,663 | 27.27% | 52,679,779 | 27.27% | 44,351,138 | 22.96% | 8,328,642 | 15.81% |
| 358.00 Underground Conductors and Devices | 77,461 | 102.05% | 79,049 | 102.05% | 62,910 | 81.22% | 16,138 | 20.42% |
| Total Transmission Plant | \$ 753,970,337 | 22.80% | \$ 171,920,607 | 22.80% | \$ 153,140,339 | 20.31% | \$ 18,780,268 | 10.92% |
| DISTRIBUTION PLANT | | | | | | | | |
| 362.00 Station Equipment | \$ 100,507,890 | 28.10% | \$ 28,238,075 | 28.10% | \$ 23,723,536 | 23.60% | \$ 4,514,539 | 15.99% |
| 364.00 Poles, Towers and Fixtures | 90,210,134 | 58.80% | 53,047,146 | 58.80% | 60,607,391 | 67.18% | (7,560,246) | -14.25% |
| 365.00 Overhead Conductors and Devices | 63,365,052 | 72.91% | 46,199,680 | 72.91% | 34,413,538 | 54.31% | 11,786,142 | 25.51% |
| 367.00 Underground Conductors and Devices | 134,078,350 | 34.53% | 46,293,680 | 34.53% | 34,657,071 | 25.85% | 11,636,609 | 25.14% |
| 368.00 Line Transformers | 135,607,045 | 17.17% | 23,284,738 | 17.17% | 26,962,074 | 19.88% | (3,677,336) | -15.79% |
| 369.00 Overhead Services | 14,304,116 | 135.58% | 19,393,408 | 135.58% | 25,764,975 | 180.12% | (6,371,568) | -32.85% |
| 369.10 Underground Services | 51,993,089 | 46.98% | 24,424,394 | 46.98% | 25,609,593 | 49.26% | (1,185,199) | -4.85% |
| 370.00 Meters | 28,368,846 | 41.70% | 11,830,605 | 41.70% | 10,143,459 | 35.76% | 1,687,146 | 14.26% |
| 370.05 Smart Meters | 921,313 | 24.04% | 221,530 | 24.04% | 249,676 | 27.10% | (28,146) | -12.71% |
| 370.10 Load Management Switches | 8,899,439 | 99.84% | 8,884,947 | 99.84% | 7,541,676 | 84.74% | 1,343,271 | 15.12% |
| 371.10 Electric Vehicle Charging Stations | 26,200 | 40.00% | 10,480 | 40.00% | 11,790 | 45.00% | (1,310) | -12.50% |
| 371.20 Other Private Lighting | 10,185,838 | 7.34% | 748,082 | 7.34% | 2,034,108 | 19.97% | (1,286,026) | -171.91% |
| 373.00 Street Lighting and Signal Systems | 14,586,957 | 11.57% | 1,688,176 | 11.57% | 2,836,844 | 19.45% | (1,148,667) | -88.04% |
| Total Distribution Plant | \$ 653,054,269 | 40.47% | \$ 264,264,941 | 40.47% | \$ 254,555,731 | 38.98% | \$ 9,709,210 | 3.67% |
| GENERAL PLANT | | | | | | | | |
| Depreciable | | | | | | | | |
| 390.00 Structures and Improvements | \$ 26,108,301 | 32.04% | \$ 8,364,381 | 32.04% | \$ 9,161,782 | 35.09% | \$ (797,401) | -9.53% |
| 390.10 General Office Buildings | 6,451,486 | 41.51% | 2,677,765 | 41.51% | 1,678,228 | 26.01% | 999,538 | 37.33% |
| 390.20 Fleet Service Center Building | 896,880 | 48.38% | 433,935 | 48.38% | 122,794 | 13.69% | 311,141 | 71.70% |
| 390.25 Fleet Service Center - Jamestown | 2,154,593 | 5.11% | 110,152 | 5.11% | (79,359) | -3.68% | 189,511 | 172.04% |
| 390.30 Central Stores Building | 4,494,284 | 33.54% | 1,507,531 | 33.54% | 398,893 | 8.88% | 1,108,638 | 73.54% |
| 396.00 Power Operated Equipment | 1,749,199 | 23.80% | 416,287 | 23.80% | 495,096 | 28.30% | (78,809) | -18.93% |
| 397.40 Communication Towers | 1,922,046 | 56.92% | 1,094,105 | 56.92% | 888,821 | 46.24% | 205,283 | 18.76% |
| Total Depreciable | \$ 43,776,789 | 33.36% | \$ 14,604,156 | 33.36% | \$ 12,666,256 | 28.93% | \$ 1,937,901 | 13.27% |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve C | | Computed Reserve E | | Reserve Imbalance G-C-E | |
|--|-----------------------|----------------|-----------------------|----------------|-----------------------|----------------|----------------------------|-------------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio F=E/B | Amount | Multiple H=G/C |
| Amortizable | | | | | | | | |
| 391.00 Office Furniture | \$ 471,009 | 71.24% | \$ 335,564 | 67.85% | \$ 319,592 | 67.85% | \$ 15,972 | 4.76% |
| 391.10 Office Equipment | 186,048 | 51.10% | 95,079 | 49.39% | 91,895 | 49.39% | 3,184 | 3.35% |
| 391.20 Duplicating Equipment | 835,707 | 23.61% | 197,343 | 23.61% | 243,335 | 29.12% | (45,992) | -23.31% |
| 391.50 Computer Systems | 3,342,987 | 37.48% | 1,253,051 | 37.48% | 1,489,307 | 44.55% | (236,256) | -18.85% |
| 391.60 Computer Related Equipment | 4,539,752 | 76.23% | 3,460,876 | 76.23% | 3,633,275 | 80.03% | (172,399) | -4.98% |
| 394.00 Tools, Shop and Garage Equipment | 5,451,853 | 43.25% | 2,357,893 | 43.25% | 2,438,461 | 44.73% | (80,568) | -3.42% |
| 394.20 Automated Meter Reading Equipment | 401,984 | 36.50% | 146,740 | 36.50% | 141,304 | 35.15% | 5,436 | 3.70% |
| 397.00 Communication Equipment | 4,869,774 | 35.46% | 1,727,013 | 35.46% | 1,961,771 | 40.28% | (234,758) | -13.59% |
| 397.10 Radio Telecommunication Equipment | 464,016 | 66.28% | 307,558 | 66.28% | 312,792 | 67.41% | (5,234) | -1.70% |
| 397.20 Microwave Equipment | 3,920,364 | 57.37% | 2,249,205 | 57.37% | 2,377,729 | 60.65% | (128,524) | -5.71% |
| 397.30 Radio Load Control Equipment | 165,980 | 62.34% | 103,470 | 62.34% | 112,020 | 67.49% | (8,550) | -8.26% |
| Total Amortizable | \$ 24,649,474 | 49.63% | \$ 12,233,792 | 49.63% | \$ 13,121,481 | 53.23% | \$ (887,689) | -7.26% |
| Total General Plant | \$ 68,426,263 | 39.22% | \$ 26,837,948 | 39.22% | \$ 25,787,737 | 37.69% | \$ 1,050,212 | 3.91% |
| TOTAL UTILITY | \$ 2,920,321,210 | 33.55% | \$ 979,889,242 | 33.55% | \$ 876,806,243 | 30.02% | \$ 103,082,999 | 10.52% |
| STEAM PRODUCTION | | | | | | | | |
| Big Stone | | | | | | | | |
| 311.00 Structures and Improvements | \$ 80,758,219 | 45.12% | \$ 36,439,897 | 45.12% | \$ 31,241,439 | 38.69% | \$ 5,198,458 | 14.27% |
| 312.00 Boiler Plant Equipment | 201,385,686 | 29.36% | 59,130,854 | 29.36% | 63,774,531 | 31.67% | (4,643,678) | -7.85% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 31,809,484 | 65.91% | 20,965,260 | 65.91% | 16,103,883 | 50.63% | 4,861,377 | 23.19% |
| 315.00 Accessory Electric Equipment | 21,066,041 | 51.10% | 10,765,123 | 51.10% | 8,958,535 | 42.53% | 1,806,588 | 16.78% |
| 316.00 Miscellaneous Power Plant Equipment | 3,617,809 | 45.28% | 1,638,273 | 45.28% | 1,536,047 | 42.46% | 102,226 | 6.24% |
| Total Big Stone | \$ 338,637,239 | 38.08% | \$ 128,939,408 | 38.08% | \$ 121,614,436 | 35.91% | \$ 7,324,972 | 5.68% |
| Hoot Lake Units 2 and 3 | | | | | | | | |
| 311.00 Structures and Improvements | \$ - | | \$ - | | \$ - | | \$ - | |
| 312.00 Boiler Plant Equipment | 11,200,043 | 63.52% | 7,113,891 | 63.52% | 2,547,611 | 22.75% | 4,566,280 | 64.19% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | | |
| Total Hoot Lake Units 2 and 3 | \$ 11,200,043 | 63.52% | \$ 7,113,891 | 63.52% | \$ 2,547,611 | 22.75% | \$ 4,566,280 | 64.19% |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve C | | Computed Reserve E | | Reserve Imbalance G-C-E | |
|--|-----------------------|----------------|-----------------------|----------------|-----------------------|----------------|----------------------------|-----------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio H=G/C | Amount | Multiple |
| Covote | | | | | | | | |
| 311.00 Structures and Improvements | \$ 35,004,316 | | \$ 27,961,074 | 79.88% | \$ 24,810,121 | 70.88% | \$ 3,150,953 | 11.27% |
| 312.00 Boiler Plant Equipment | 107,451,964 | | 72,023,661 | 67.03% | 65,990,515 | 61.41% | 6,033,147 | 8.38% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | |
| 314.00 Turbogenerator Units | 26,209,547 | | 15,594,332 | 59.50% | 15,290,126 | 58.34% | 304,206 | 1.95% |
| 315.00 Accessory Electric Equipment | 12,185,103 | | 9,469,139 | 77.71% | 8,382,371 | 68.79% | 1,086,768 | 11.48% |
| 316.00 Miscellaneous Power Plant Equipment | 2,424,444 | | 1,117,108 | 46.08% | 1,191,107 | 49.13% | (73,999) | -6.62% |
| Total Coyote | \$ 183,275,374 | | \$ 126,165,315 | 68.84% | \$ 115,664,240 | 63.11% | \$ 10,501,075 | 8.32% |
| HYDRAULIC PRODUCTION | | | | | | | | |
| Hoot Lake | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,422,555 | | \$ 653,689 | 45.95% | \$ 224,302 | 15.77% | \$ 429,386 | 65.69% |
| 332.00 Reservoirs, Dams and Waterways | 390,152 | | 316,018 | 81.00% | 174,053 | 44.61% | 141,965 | 44.92% |
| 333.00 Water Wheels, Turbines & Generators | 104,195 | | 103,081 | 98.93% | 52,190 | 50.09% | 50,891 | 49.37% |
| 334.00 Accessory Electric Equipment | 1,216,302 | | 69,662 | 5.73% | 53,324 | 4.38% | 16,338 | 23.45% |
| 335.00 Miscellaneous Power Plant Equipment | 285,348 | | 325,977 | 114.24% | 73,063 | 25.61% | 252,914 | 77.59% |
| Total Hoot Lake | \$ 3,418,552 | | \$ 1,468,428 | 42.95% | \$ 576,934 | 16.88% | \$ 891,494 | 60.71% |
| Wright | | | | | | | | |
| 331.00 Structures and Improvements | \$ 20,080 | | \$ 18,632 | 92.79% | \$ 9,614 | 47.88% | \$ 9,019 | 48.40% |
| 332.00 Reservoirs, Dams and Waterways | 973,942 | | 825,595 | 84.77% | 441,317 | 45.31% | 384,278 | 46.55% |
| 333.00 Water Wheels, Turbines & Generators | 545,392 | | 530,174 | 97.21% | 123,669 | 22.68% | 406,505 | 76.67% |
| 334.00 Accessory Electric Equipment | 202,552 | | 194,338 | 95.94% | 71,670 | 35.38% | 122,669 | 63.12% |
| 335.00 Miscellaneous Power Plant Equipment | 115,218 | | 108,255 | 93.96% | 35,424 | 30.75% | 72,831 | 67.28% |
| Total Wright | \$ 1,857,184 | | \$ 1,676,994 | 90.30% | \$ 681,693 | 36.71% | \$ 995,301 | 59.35% |
| Pisgah | | | | | | | | |
| 331.00 Structures and Improvements | \$ 13,172 | | \$ 11,932 | 90.58% | \$ 6,596 | 50.08% | \$ 5,336 | 44.72% |
| 332.00 Reservoirs, Dams and Waterways | 2,189,300 | | (385,098) | -17.59% | (543,842) | -24.84% | 158,744 | -41.22% |
| 333.00 Water Wheels, Turbines & Generators | 159,732 | | 151,829 | 95.05% | 35,973 | 22.52% | 115,856 | 76.31% |
| 334.00 Accessory Electric Equipment | 102,487 | | 97,715 | 95.34% | 32,794 | 32.00% | 64,921 | 66.44% |
| 335.00 Miscellaneous Power Plant Equipment | 62,744 | | 57,238 | 91.22% | 13,646 | 21.75% | 43,592 | 76.16% |
| Total Pisgah | \$ 2,527,435 | | \$ (66,384) | -2.63% | \$ (454,833) | -18.00% | \$ 388,449 | -685.15% |

Statement C

OTTER TAIL POWER COMPANY

Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve C | | Computed Reserve E | | Reserve Imbalance G-C-E | |
|--|-----------------------|----------------|-----------------------|----------------|-----------------------|---------------|----------------------------|-------------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio | Amount | Multiple H=G/C |
| Dayton Hollow | | | | | | | | |
| 331.00 Structures and Improvements | \$ 181,086 | 0.71% | 1,280 | 5.84% | 10,581 | 5.84% | \$ (9,302) | -726.96% |
| 332.00 Reservoirs, Dams and Waterways | 2,118,681 | 39.96% | 846,666 | 6.19% | 131,216 | 6.19% | 715,451 | 84.50% |
| 333.00 Water Wheels, Turbines & Generators | 226,751 | 95.13% | 215,698 | 24.22% | 54,915 | 24.22% | 160,783 | 74.54% |
| 334.00 Accessory Electric Equipment | 193,342 | 96.61% | 186,789 | 38.96% | 75,326 | 38.96% | 111,462 | 59.67% |
| 335.00 Miscellaneous Power Plant Equipment | 110,889 | 91.89% | 101,897 | 22.06% | 24,462 | 22.06% | 77,435 | 75.99% |
| Total Dayton Hollow | \$ 2,830,749 | 47.77% | \$ 1,352,329 | 10.47% | \$ 296,500 | 10.47% | \$ 1,055,830 | 78.07% |
| Taplin Gorge | | | | | | | | |
| 331.00 Structures and Improvements | \$ 35,140 | 99.33% | 34,903 | 66.85% | 23,490 | 66.85% | \$ 11,413 | 32.70% |
| 332.00 Reservoirs, Dams and Waterways | 704,300 | 81.64% | 574,974 | 33.36% | 234,961 | 33.36% | 340,014 | 59.14% |
| 333.00 Water Wheels, Turbines & Generators | 15,110 | 99.41% | 15,021 | 68.28% | 10,317 | 68.28% | 4,705 | 31.32% |
| 334.00 Accessory Electric Equipment | 58,695 | 97.03% | 56,954 | 41.96% | 24,630 | 41.96% | 32,323 | 56.75% |
| 335.00 Miscellaneous Power Plant Equipment | 96,303 | 93.73% | 90,263 | 35.46% | 29,123 | 35.46% | 61,140 | 67.74% |
| Total Taplin Gorge | \$ 909,548 | 84.89% | \$ 772,116 | 35.46% | \$ 322,521 | 35.46% | \$ 449,595 | 58.23% |
| OTHER PRODUCTION | | | | | | | | |
| Jamestown1 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 311,512 | 86.37% | 269,055 | 66.49% | 207,129 | 66.49% | \$ 61,926 | 23.02% |
| 342.00 Fuel Holders and Accessories | 415,964 | 78.78% | 327,681 | 57.46% | 239,001 | 57.46% | 88,680 | 27.06% |
| 343.00 Prime Movers | 7,168,816 | 87.19% | 6,250,519 | 68.90% | 4,939,574 | 68.90% | 1,310,946 | 20.97% |
| 345.00 Accessory Electric Equipment | 227,590 | 81.66% | 185,856 | 70.35% | 160,118 | 70.35% | 25,737 | 13.85% |
| 346.00 Miscellaneous Power Plant Equipment | 88,665 | 72.56% | 64,332 | 53.48% | 47,422 | 53.48% | 16,911 | 26.29% |
| Total Jamestown | \$ 8,212,547 | 86.42% | \$ 7,097,444 | 68.11% | \$ 5,593,244 | 68.11% | \$ 1,504,200 | 21.19% |
| Jamestown Unit 1 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 286,659 | 87.18% | 249,908 | 67.30% | 192,934 | 67.30% | \$ 56,974 | 22.80% |
| 342.00 Fuel Holders and Accessories | 379,195 | 77.40% | 293,484 | 57.31% | 217,306 | 57.31% | 76,178 | 25.96% |
| 343.00 Prime Movers | 3,139,011 | 84.41% | 2,649,679 | 66.19% | 2,077,699 | 66.19% | 571,980 | 21.59% |
| 345.00 Accessory Electric Equipment | 155,272 | 89.18% | 138,478 | 79.49% | 123,422 | 79.49% | 15,056 | 10.87% |
| 346.00 Miscellaneous Power Plant Equipment | 85,462 | 71.24% | 60,885 | 52.47% | 44,841 | 52.47% | 16,044 | 26.35% |
| Total Jamestown Unit 1 | \$ 4,045,599 | 83.85% | \$ 3,392,433 | 65.66% | \$ 2,656,202 | 65.66% | \$ 736,231 | 21.70% |
| Jamestown Unit 2 | | | | | | | | |
| 341.00 Structures and Improvements | \$ 24,853 | 77.04% | 19,147 | 57.12% | 14,195 | 57.12% | \$ 4,952 | 25.86% |
| 342.00 Fuel Holders and Accessories | 36,769 | 93.01% | 34,198 | 59.00% | 21,695 | 59.00% | 12,503 | 36.56% |
| 343.00 Prime Movers | 4,029,805 | 89.36% | 3,600,841 | 71.02% | 2,861,875 | 71.02% | 738,966 | 20.52% |
| 345.00 Accessory Electric Equipment | 72,318 | 65.51% | 47,378 | 50.74% | 36,697 | 50.74% | 10,681 | 22.54% |
| 346.00 Miscellaneous Power Plant Equipment | 3,203 | 107.63% | 3,448 | 80.56% | 2,580 | 80.56% | 867 | 25.15% |
| Total Jamestown Unit 2 | \$ 4,166,948 | 88.91% | \$ 3,705,011 | 70.48% | \$ 2,937,042 | 70.48% | \$ 767,969 | 20.73% |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve Amount C | | Computed Reserve Amount E | | Reserve Imbalance Amount G-C-E | | Multiple H-G/C | |
|---|--------------------------|----------------|---------------------------------|----------------|---------------------------------|----------------|--------------------------------------|----------------|-----------------------|-------------------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio F=E/B | Amount | Ratio F=E/B | Amount | Multiple H-G/C |
| Lake Preston | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 279,726 | \$ | 205,712 | 73.54% | \$ 172,472 | 61.66% | \$ 33,240 | 16.16% | \$ 33,240 | 16.16% |
| 342.00 Fuel Holders and Accessories | 328,705 | | 297,728 | 90.58% | 233,419 | 71.01% | 64,309 | 21.60% | 64,309 | 21.60% |
| 343.00 Prime Movers | 3,477,302 | | 3,027,747 | 87.07% | 2,424,950 | 69.74% | 602,797 | 19.91% | 602,797 | 19.91% |
| 345.00 Accessory Electric Equipment | 400,094 | | 366,432 | 91.59% | 292,998 | 73.23% | 73,434 | 20.04% | 73,434 | 20.04% |
| 346.00 Miscellaneous Power Plant Equipment | 21,322 | | 20,798 | 97.54% | 16,984 | 79.65% | 3,815 | 18.34% | 3,815 | 18.34% |
| Total Lake Preston | \$ 4,507,149 | \$ | \$ 3,918,418 | 86.94% | \$ 3,140,822 | 69.69% | \$ 777,595 | 19.84% | \$ 777,595 | 19.84% |
| Solway Combustion Turbine | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,907,301 | \$ | 2,678,412 | 54.58% | \$ 2,667,250 | 54.35% | \$ 11,163 | 0.42% | \$ 11,163 | 0.42% |
| 342.00 Fuel Holders and Accessories | 1,104,855 | | 592,353 | 53.61% | 591,310 | 53.52% | 1,043 | 0.18% | 1,043 | 0.18% |
| 343.00 Prime Movers | 21,914,301 | | 9,379,658 | 42.80% | 11,086,157 | 50.59% | (1,706,499) | -18.19% | (1,706,499) | -18.19% |
| 345.00 Accessory Electric Equipment | 1,310,193 | | 738,708 | 56.38% | 747,141 | 57.03% | (8,433) | -1.14% | (8,433) | -1.14% |
| 346.00 Miscellaneous Power Plant Equipment | 318,649 | | 167,532 | 52.58% | 169,253 | 53.12% | (1,721) | -1.03% | (1,721) | -1.03% |
| Total Solway Combustion Turbine | \$ 29,555,299 | \$ | \$ 13,556,664 | 45.87% | \$ 15,261,111 | 51.64% | \$ (1,704,447) | -12.57% | \$ (1,704,447) | -12.57% |
| Astoria Station Combustion Turbine | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 25,452,349 | \$ | 2,006,578 | 7.88% | \$ 1,773,036 | 6.97% | \$ 233,542 | 11.64% | \$ 233,542 | 11.64% |
| 342.00 Fuel Holders and Accessories | 5,913,271 | | 472,136 | 7.98% | 416,970 | 7.05% | 55,166 | 11.68% | 55,166 | 11.68% |
| 343.00 Prime Movers | 108,028,020 | | 8,617,191 | 7.98% | 7,617,524 | 7.05% | 999,667 | 11.60% | 999,667 | 11.60% |
| 345.00 Accessory Electric Equipment | 7,391,588 | | 590,170 | 7.98% | 521,213 | 7.05% | 68,957 | 11.68% | 68,957 | 11.68% |
| 346.00 Miscellaneous Power Plant Equipment | 1,478,318 | | 118,034 | 7.98% | 104,243 | 7.05% | 13,791 | 11.68% | 13,791 | 11.68% |
| Total Astoria Station Combustion Turbine | \$ 148,263,546 | \$ | \$ 11,804,108 | 7.96% | \$ 10,432,986 | 7.04% | \$ 1,371,122 | 11.62% | \$ 1,371,122 | 11.62% |
| WIND PRODUCTION | | | | | | | | | | |
| Ashtabula | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 3,248,290 | \$ | 1,823,483 | 56.14% | \$ 1,510,608 | 46.50% | \$ 312,875 | 17.16% | \$ 312,875 | 17.16% |
| 344.00 Generators | 105,926,168 | | 55,994,819 | 52.86% | 48,078,572 | 45.39% | 7,916,247 | 14.14% | 7,916,247 | 14.14% |
| 345.00 Accessory Electric Equipment | 6,479,774 | | 3,592,399 | 55.44% | 2,976,272 | 45.93% | 616,127 | 17.15% | 616,127 | 17.15% |
| 346.00 Miscellaneous Power Plant Equipment | 103,431 | | (542) | -0.52% | 18,164 | 17.56% | (18,706) | 3449.29% | (18,706) | 3449.29% |
| Total Ashtabula | \$ 115,757,563 | \$ | \$ 61,410,158 | 53.05% | \$ 52,583,615 | 45.43% | \$ 8,826,543 | 14.37% | \$ 8,826,543 | 14.37% |
| Ashtabula III | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,027,787 | \$ | 1,468,337 | 36.46% | \$ 87,697 | 2.18% | \$ 1,380,641 | 94.20% | \$ 1,380,641 | 94.20% |
| 344.00 Generators | 70,688,754 | | 26,537,074 | 37.54% | 1,539,100 | 2.18% | 24,997,974 | 94.20% | 24,997,974 | 94.20% |
| 345.00 Accessory Electric Equipment | 7,024,753 | | 2,608,580 | 37.13% | 152,949 | 2.18% | 2,455,630 | 94.14% | 2,455,630 | 94.14% |
| 346.00 Miscellaneous Power Plant Equipment | 222,806 | | 57,832 | 25.96% | 4,851 | 2.18% | 52,980 | 94.18% | 52,980 | 94.18% |
| Total Ashtabula III | \$ 81,964,100 | \$ | \$ 30,671,823 | 37.42% | \$ 1,784,597 | 2.18% | \$ 28,887,225 | 94.18% | \$ 28,887,225 | 94.18% |

Statement C

OTTER TAIL POWER COMPANY
Depreciation Reserve Summary
Vintage Group Procedure
December 31, 2023

| Account Description A | Plant Investment B | | Recorded Reserve Amount C | | Computed Reserve Amount E | | Reserve Imbalance Amount G-C-E | |
|--|--------------------------|----------------|---------------------------------|----------------|---------------------------------|----------------|--------------------------------------|----------|
| | Amount | Ratio D=C/B | Amount | Ratio F=E/B | Amount | Ratio H=G/C | Amount | Multiple |
| Langdon | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,484,069 | 59.88% | \$ 1,487,545 | 50.16% | \$ 1,245,911 | 50.16% | \$ 241,635 | 16.24% |
| 344.00 Generators | 69,539,883 | 56.71% | 39,433,127 | 48.89% | 33,998,769 | 48.89% | 5,434,358 | 13.78% |
| 345.00 Accessory Electric Equipment | 8,327,422 | 52.58% | 4,378,624 | 44.20% | 3,680,596 | 44.20% | 698,028 | 15.94% |
| 346.00 Miscellaneous Power Plant Equipment | 118,790 | -0.50% | (593) | 22.80% | 27,086 | 22.80% | (27,678) | 4669.96% |
| Total Langdon | \$ 80,470,164 | 56.29% | \$ 45,298,704 | 48.41% | \$ 38,952,361 | 48.41% | \$ 6,346,343 | 14.01% |
| Luverne | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,266,581 | 53.63% | \$ 1,215,645 | 45.11% | \$ 1,022,471 | 45.11% | \$ 193,174 | 15.89% |
| 344.00 Generators | 67,158,480 | 47.05% | 31,599,750 | 42.27% | 28,389,367 | 42.27% | 3,210,383 | 10.16% |
| 345.00 Accessory Electric Equipment | 4,863,837 | 53.61% | 2,607,537 | 45.09% | 2,193,169 | 45.09% | 414,368 | 15.89% |
| 346.00 Miscellaneous Power Plant Equipment | 149,262 | 2.88% | 4,301 | 21.63% | 32,279 | 21.63% | (27,978) | -650.58% |
| Total Luverne | \$ 74,438,160 | 47.59% | \$ 35,427,233 | 42.50% | \$ 31,637,287 | 42.50% | \$ 3,789,947 | 10.70% |
| Merricourt | | | | | | | | |
| 341.00 Structures and Improvements | \$ 7,960,903 | 9.31% | \$ 741,307 | 10.31% | \$ 820,885 | 10.31% | \$ (79,578) | -10.73% |
| 344.00 Generators | 234,615,570 | 9.46% | 22,200,178 | 10.46% | 24,535,967 | 10.46% | (2,335,789) | -10.52% |
| 345.00 Accessory Electric Equipment | 18,247,878 | 9.46% | 1,726,680 | 10.46% | 1,908,353 | 10.46% | (181,673) | -10.52% |
| 346.00 Miscellaneous Power Plant Equipment | 59,264 | 0.96% | 568 | 2.21% | 1,310 | 2.21% | (742) | -130.63% |
| Total Merricourt | \$ 260,883,615 | 9.46% | \$ 24,668,734 | 10.45% | \$ 27,266,516 | 10.45% | \$ (2,597,782) | -10.53% |
| SOLAR PRODUCTION | | | | | | | | |
| Jamestown | | | | | | | | |
| 341.00 Structures and Improvements | \$ 17,105 | 14.89% | \$ 2,548 | 13.80% | \$ 2,360 | 13.80% | \$ 188 | 7.37% |
| 345.00 Accessory Electric Equipment | 151,476 | 14.90% | 22,563 | 13.80% | 20,900 | 13.80% | 1,663 | 7.37% |
| Total Jamestown | \$ 168,581 | 14.90% | \$ 25,110 | 13.80% | \$ 23,260 | 13.80% | \$ 1,851 | 7.37% |
| Hoot Lake | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,837,841 | 0.85% | \$ 15,614 | 1.55% | \$ 28,466 | 1.55% | \$ (12,852) | -82.31% |
| 345.00 Accessory Electric Equipment | 56,973,080 | 0.85% | 484,036 | 1.55% | 882,461 | 1.55% | (398,426) | -82.31% |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 0.85% | 5,205 | 1.55% | 9,489 | 1.55% | (4,284) | -82.31% |
| Total Hoot Lake | \$ 59,423,535 | 0.85% | \$ 504,854 | 1.55% | \$ 920,417 | 1.55% | \$ (415,562) | -82.31% |
| Rush Lake | | | | | | | | |
| 341.00 Structures and Improvements | \$ 13,536 | 12.86% | \$ 1,741 | 13.80% | \$ 1,868 | 13.80% | \$ (126) | -7.25% |
| 345.00 Accessory Electric Equipment | 142,586 | 12.86% | 18,343 | 13.80% | 19,673 | 13.80% | (1,330) | -7.25% |
| Total Rush Lake | \$ 156,122 | 12.86% | \$ 20,084 | 13.80% | \$ 21,541 | 13.80% | \$ (1,457) | -7.25% |

Statement D
OTTER TAIL POWER COMPANY
Average Net Salvage

| Account Description | A | | B | | C | | D-E-C | | F | | G-E-C | | H-F-D | | I-G-H | | Average Rate J-I-B |
|---|-------------------------|-----------------------|-------------------------|--------------|---------------|-----------------------|-------------------------|-------------------------|---------------|----------|--------|----------|--------|-------|--------------|--|-----------------------|
| | Additions | Retirements | Survivors | Realized | Future | Realized | Future | Realized | Future | Realized | Future | Realized | Future | Total | Average Rate | | |
| 356.00 Overhead Conductors and Devices | 203,156,081 | 9,998,418 | 193,157,663 | 16.2% | -30.0% | 1,619,744 | (57,947,299) | (56,327,555) | -27.7% | | | | | | | | |
| 358.00 Underground Conductors and Devices | 77,956 | 495 | 77,461 | -368.9% | -5.0% | (1,826) | (3,873) | (5,699) | -7.3% | | | | | | | | |
| Total Transmission Plant | \$ 788,089,785 | \$ 34,119,448 | \$ 753,970,337 | 25.8% | -23.1% | \$ 8,807,186 | \$ (174,199,948) | \$ (165,392,762) | -21.0% | | | | | | | | |
| DISTRIBUTION PLANT | | | | | | | | | | | | | | | | | |
| 362.00 Station Equipment | \$ 125,106,185 | \$ 24,598,295 | \$ 100,507,890 | 12.1% | -5.0% | \$ 2,976,394 | \$ (5,025,395) | \$ (2,049,001) | -1.6% | | | | | | | | |
| 364.00 Poles, Towers and Fixtures | 94,576,586 | 4,366,452 | 90,210,134 | -125.1% | -125.0% | (5,462,431) | (112,762,668) | (118,225,099) | -125.0% | | | | | | | | |
| 365.00 Overhead Conductors and Devices | 68,994,870 | 5,629,818 | 63,365,052 | -72.3% | -70.0% | (4,070,358) | (44,355,536) | (48,425,895) | -70.2% | | | | | | | | |
| 367.00 Underground Conductors and Devices | 142,051,882 | 7,973,532 | 134,078,350 | -2.5% | -5.0% | (199,338) | (6,703,918) | (6,903,256) | -4.9% | | | | | | | | |
| 368.00 Line Transformers | 153,639,085 | 18,032,040 | 135,607,045 | 37.8% | 30.0% | 6,816,111 | 40,682,114 | 47,498,225 | 30.9% | | | | | | | | |
| 369.00 Overhead Services | 15,149,460 | 845,344 | 14,304,116 | -310.0% | -300.0% | (2,620,566) | (42,912,348) | (45,532,914) | -300.6% | | | | | | | | |
| 369.10 Underground Services | 52,801,081 | 807,992 | 51,993,089 | -51.8% | -50.0% | (418,540) | (25,996,545) | (26,415,084) | -50.0% | | | | | | | | |
| 370.00 Meters | 37,764,284 | 9,395,438 | 28,368,846 | 0.6% | | 56,373 | | 56,373 | 0.1% | | | | | | | | |
| 370.05 Smart Meters | 921,313 | | 921,313 | | | | | | | | | | | | | | |
| 370.10 Load Management Switches | 11,115,823 | 2,216,384 | 8,899,439 | | | | | | | | | | | | | | |
| 371.10 Electric Vehicle Charging Stations | 735,100 | 708,900 | 26,200 | | | | | | | | | | | | | | |
| 371.20 Other Private Lighting | 15,246,372 | 5,060,534 | 10,185,838 | -1.1% | -5.0% | (55,666) | (509,292) | (564,958) | -3.7% | | | | | | | | |
| 373.00 Street Lighting and Signal Systems | 21,470,940 | 6,883,983 | 14,586,957 | -11.4% | -10.0% | (784,774) | (1,458,696) | (2,243,470) | -10.4% | | | | | | | | |
| Total Distribution Plant | \$ 739,572,981 | \$ 86,518,712 | \$ 653,054,269 | -4.3% | -30.5% | \$ (3,762,797) | \$ (199,042,283) | \$ (202,805,079) | -27.4% | | | | | | | | |
| GENERAL PLANT | | | | | | | | | | | | | | | | | |
| Depreciable | | | | | | | | | | | | | | | | | |
| 390.00 Structures and Improvements | \$ 30,719,959 | \$ 4,611,658 | \$ 26,108,301 | 29.7% | | \$ 1,369,662 | \$ - | \$ 1,369,662 | 4.5% | | | | | | | | |
| 390.10 General Office Buildings | 7,789,004 | 1,337,518 | 6,451,486 | -14.7% | 46.5% | (196,615) | 2,999,165 | 2,802,550 | 36.0% | | | | | | | | |
| 390.20 Fleet Service Center Building | 998,658 | 101,778 | 896,880 | -45.1% | 59.1% | (45,902) | 530,445 | 484,544 | 48.5% | | | | | | | | |
| 390.25 Fleet Service Center - Jamestown | 2,154,593 | | 2,154,593 | | 152.3% | | 3,281,546 | 3,281,546 | 152.3% | | | | | | | | |
| 390.30 Central Stores Building | 4,590,840 | 96,556 | 4,494,284 | -7.2% | 83.7% | (6,952) | 3,760,435 | 3,753,483 | 81.8% | | | | | | | | |
| 396.00 Power Operated Equipment | 2,555,161 | 805,962 | 1,749,199 | 19.6% | 5.0% | 157,969 | 87,460 | 245,429 | 9.6% | | | | | | | | |
| 397.40 Communication Towers | 2,084,583 | 162,537 | 1,922,046 | 12.0% | -5.0% | 19,504 | (96,102) | (76,598) | -3.7% | | | | | | | | |
| Total Depreciable | \$ 50,892,798 | \$ 7,116,009 | \$ 43,776,789 | 18.2% | 24.1% | \$ 1,297,666 | \$ 10,562,949 | \$ 11,860,615 | 23.3% | | | | | | | | |
| Amortizable | | | | | | | | | | | | | | | | | |
| 391.00 Office Furniture | \$ 6,241,789 | \$ 5,770,780 | \$ 471,009 | | | \$ - | \$ - | \$ - | | | | | | | | | |
| 391.10 Office Equipment | 3,080,705 | 2,894,657 | 186,048 | | | | | | | | | | | | | | |
| 391.20 Duplicating Equipment | 2,935,149 | 2,099,442 | 835,707 | | | | | | | | | | | | | | |
| 391.50 Computer Systems | 18,998,242 | 15,655,255 | 3,342,987 | | | | | | | | | | | | | | |
| 391.60 Computer Related Equipment | 15,437,904 | 10,898,152 | 4,539,752 | | | | | | | | | | | | | | |
| 394.00 Tools, Shop and Garage Equipment | 10,500,267 | 5,048,414 | 5,451,853 | | | | | | | | | | | | | | |
| 394.20 Automated Meter Reading Equipment | 2,471,282 | 2,069,298 | 401,984 | | | | | | | | | | | | | | |
| 397.00 Communication Equipment | 6,236,086 | 1,366,312 | 4,869,774 | | | | | | | | | | | | | | |
| 397.10 Radio Telecommunication Equipment | 6,762,689 | 6,298,673 | 464,016 | | | | | | | | | | | | | | |
| 397.20 Microwave Equipment | 8,864,666 | 4,944,302 | 3,920,364 | | | | | | | | | | | | | | |
| 397.30 Radio Load Control Equipment | 1,937,472 | 1,771,492 | 165,980 | | | | | | | | | | | | | | |
| Total Amortizable | \$ 83,466,251 | \$ 58,816,777 | \$ 24,649,474 | | | \$ - | \$ - | \$ - | | | | | | | | | |
| Total General Plant | \$ 134,359,049 | \$ 65,932,786 | \$ 68,426,263 | 2.0% | 15.4% | \$ 1,297,666 | \$ 10,562,949 | \$ 11,860,615 | 8.8% | | | | | | | | |
| TOTAL UTILITY | \$ 3,228,688,449 | \$ 308,367,239 | \$ 2,920,321,210 | -1.7% | -15.9% | \$ (5,304,562) | \$ (463,051,813) | \$ (468,356,375) | -14.5% | | | | | | | | |

Statement D

OTTER TAIL POWER COMPANY

Average Net Salvage

| Account Description A | Additions B | | Plant Investment C | | Survivors D-B-C | | Salvage Rate E | | Net Salvage F-H-F-D | | Average Rate J-I-B |
|--|-----------------------|----------------------|-----------------------|---------------|-----------------------|-----------------------|-----------------------|--------------|------------------------|-----------------------|--------------------------|
| | | | | | | | Realized G-E-C | Future F | Future H-F-D | Total I-G-H | |
| STEAM PRODUCTION | | | | | | | | | | | |
| Big Stone | | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 81,980,391 | \$ 1,222,172 | \$ 80,758,219 | -11.7% | \$ (142,994) | \$ (4,606,700) | \$ (4,749,694) | -5.8% | | (4,749,694) | -5.8% |
| 312.00 Boiler Plant Equipment | 254,594,003 | 53,208,317 | 201,385,686 | -22.1% | (11,759,038) | (11,483,570) | (23,242,608) | -9.1% | | | |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | | | | |
| 314.00 Turbo-generator Units | 38,857,523 | 7,048,039 | 31,809,484 | 14.0% | 986,725 | (1,816,185) | (829,460) | -2.1% | | (829,460) | -2.1% |
| 315.00 Accessory Electric Equipment | 22,030,413 | 964,372 | 21,066,041 | -14.8% | (142,727) | (1,202,218) | (1,344,945) | -6.1% | | (1,344,945) | -6.1% |
| 316.00 Miscellaneous Power Plant Equipment | 5,384,808 | 1,766,999 | 3,617,809 | 2.4% | 42,408 | (206,485) | (164,077) | -3.0% | | (164,077) | -3.0% |
| Total Big Stone | \$ 402,847,138 | \$ 64,209,899 | \$ 338,637,239 | -17.2% | \$(11,015,626) | \$(19,315,159) | \$(30,330,785) | -7.5% | | \$(30,330,785) | -7.5% |
| Hoot Lake Units 2 and 3 | | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ - | \$ - | \$ - | | \$ - | \$ - | \$ - | | | \$ - | |
| 312.00 Boiler Plant Equipment | | | | | | | | | | | |
| 312.10 Boiler Plant Equipment - Landfill | 11,227,543 | 27,500 | 11,200,043 | | | | | | | | |
| 314.00 Turbo-generator Units | | | | | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | | | | | |
| Total Hoot Lake Units 2 and 3 | \$ 11,227,543 | \$ 27,500 | \$ 11,200,043 | | \$ - | \$ - | \$ - | | | \$ - | |
| Coyote | | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 35,989,402 | \$ 985,086 | \$ 35,004,316 | 10.1% | \$ 99,494 | (2,972,425) | (2,872,932) | -8.0% | | (2,872,932) | -8.0% |
| 312.00 Boiler Plant Equipment | 125,645,832 | 18,193,868 | 107,451,964 | -2.7% | (491,234) | (9,122,957) | (9,614,192) | -7.7% | | | |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | | | | |
| 314.00 Turbo-generator Units | 35,625,776 | 9,416,229 | 26,209,547 | 21.9% | 2,062,154 | (2,224,987) | (162,833) | -0.5% | | (162,833) | -0.5% |
| 315.00 Accessory Electric Equipment | 13,180,814 | 995,711 | 12,185,103 | 4.6% | 45,803 | (1,034,657) | (988,854) | -7.5% | | (988,854) | -7.5% |
| 316.00 Miscellaneous Power Plant Equipment | 4,038,514 | 1,614,070 | 2,424,444 | 10.3% | 166,249 | (205,795) | (39,546) | -1.0% | | (39,546) | -1.0% |
| Total Coyote | \$ 214,480,338 | \$ 31,204,964 | \$ 183,275,374 | 6.0% | \$ 1,882,465 | \$(15,560,821) | \$(13,678,356) | -6.4% | | \$(13,678,356) | -6.4% |
| HYDRAULIC PRODUCTION | | | | | | | | | | | |
| Hoot Lake | | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 1,422,888 | \$ 333 | \$ 1,422,555 | -641.5% | \$ (2,136) | \$ - | (2,136) | -0.2% | | (2,136) | -0.2% |
| 332.00 Reservoirs, Dams and Waterways | 398,236 | 8,084 | 390,152 | -2.5% | (202) | - | (202) | -0.1% | | (202) | -0.1% |
| 333.00 Water Wheels, Turbines & Generators | 104,195 | | 104,195 | | | | | | | | |
| 334.00 Accessory Electric Equipment | 1,216,302 | | 1,216,302 | | | | | | | | |
| 335.00 Miscellaneous Power Plant Equipment | 285,348 | | 285,348 | | | | | | | | |
| Total Hoot Lake | \$ 3,426,969 | \$ 8,417 | \$ 3,418,552 | -27.8% | \$(2,338) | \$ - | \$(2,338) | -0.1% | | \$(2,338) | -0.1% |
| Wright | | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 20,080 | \$ - | \$ 20,080 | | \$ - | \$ - | \$ - | | | \$ - | |
| 332.00 Reservoirs, Dams and Waterways | 982,535 | 8,593 | 973,942 | 2843.7% | 244,359 | - | 244,359 | 24.9% | | 244,359 | 24.9% |
| 333.00 Water Wheels, Turbines & Generators | 552,421 | 7,029 | 545,392 | -284.6% | (20,005) | - | (20,005) | -3.6% | | (20,005) | -3.6% |
| 334.00 Accessory Electric Equipment | 203,915 | 1,363 | 202,552 | 334.2% | 4,555 | - | 4,555 | 2.2% | | 4,555 | 2.2% |
| 335.00 Miscellaneous Power Plant Equipment | 127,250 | 12,032 | 115,218 | -7.9% | (951) | - | (951) | -0.7% | | (951) | -0.7% |
| Total Wright | \$ 1,886,201 | \$ 29,017 | \$ 1,857,184 | 785.6% | \$ 227,959 | \$ - | \$ 227,959 | 12.1% | | \$ 227,959 | 12.1% |

Statement D

OTTER TAIL POWER COMPANY

Average Net Salvage

| Account Description A | Additions B | | Plant Investment C | | Survivors D-B-C | | Salvage Rate E | | Net Salvage F | | Total I=J+H | Average Rate J-I/B |
|--|---------------------|-------------------|-----------------------|----------------|--------------------|--|-------------------|-------------|-------------------|-----------------|--------------------|--------------------------|
| | | | | | | | Realized E | Future F | Realized G-E-C | Future H-F-D | | |
| Pisgah | | | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 13,172 | \$ - | \$ 13,172 | | | | | | | | | |
| 332.00 Reservoirs, Dams and Waterways | 2,190,860 | 1,560 | 2,189,300 | -59645.7% | | | | | | | (930,473) | -42.5% |
| 333.00 Water Wheels, Turbines & Generators | 161,200 | 1,468 | 159,732 | -1645.1% | | | | | | | (24,150) | -15.0% |
| 334.00 Accessory Electric Equipment | 114,648 | 12,161 | 102,487 | -2.4% | | | | | | | (292) | -0.3% |
| 335.00 Miscellaneous Power Plant Equipment | 84,563 | 21,819 | 62,744 | -2.5% | | | | | | | (545) | -0.6% |
| Total Pisgah | \$ 2,564,443 | \$ 37,008 | \$ 2,527,435 | -281.8% | | | | | | | \$(955,460) | -37.3% |
| Dayton Hollow | | | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 197,289 | \$ 16,203 | \$ 181,086 | -14.8% | | | | | | | | |
| 332.00 Reservoirs, Dams and Waterways | 2,335,090 | 216,409 | 2,118,681 | -171.8% | | | | | | | (2,398) | -1.2% |
| 333.00 Water Wheels, Turbines & Generators | 239,295 | 12,544 | 226,751 | -195.3% | | | | | | | (371,791) | -15.9% |
| 334.00 Accessory Electric Equipment | 193,849 | 507 | 193,342 | 41.7% | | | | | | | 211 | 0.1% |
| 335.00 Miscellaneous Power Plant Equipment | 119,243 | 8,354 | 110,889 | -2.4% | | | | | | | (200) | -0.2% |
| Total Dayton Hollow | \$ 3,084,766 | \$ 254,017 | \$ 2,830,749 | -156.9% | | | | | | | \$(398,676) | -12.9% |
| Taplin Gorge | | | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 35,140 | \$ - | \$ 35,140 | | | | | | | | | |
| 332.00 Reservoirs, Dams and Waterways | 722,300 | 18,000 | 704,300 | -166.7% | | | | | | | (30,006) | -4.2% |
| 333.00 Water Wheels, Turbines & Generators | 15,110 | | 15,110 | | | | | | | | | |
| 334.00 Accessory Electric Equipment | 62,427 | 3,732 | 58,695 | -4.7% | | | | | | | (175) | -0.3% |
| 335.00 Miscellaneous Power Plant Equipment | 130,503 | 34,200 | 96,303 | 6.7% | | | | | | | 2,291 | 1.8% |
| Total Taplin Gorge | \$ 965,480 | \$ 55,932 | \$ 909,548 | -49.9% | | | | | | | \$(27,890) | -2.9% |
| OTHER PRODUCTION | | | | | | | | | | | | |
| Jamesstown | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 317,686 | \$ 6,174 | \$ 311,512 | -15.2% | | | | | | | | |
| 342.00 Fuel Holders and Accessories | 593,813 | 177,849 | 415,964 | -12.6% | | | | | | | (22,488) | -8.5% |
| 343.00 Prime Movers | 7,718,333 | 549,517 | 7,168,816 | -23.6% | | | | | | | (129,431) | -8.0% |
| 345.00 Accessory Electric Equipment | 263,937 | 36,347 | 227,590 | 22.6% | | | | | | | 8,205 | 2.7% |
| 346.00 Miscellaneous Power Plant Equipment | 139,078 | 50,413 | 88,665 | 22.2% | | | | | | | 11,201 | 3.7% |
| Total Jamesstown | \$ 9,032,847 | \$ 820,300 | \$ 8,212,547 | -16.3% | | | | | | | \$(133,450) | -7.6% |
| Jamesstown Unit 1 | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 292,833 | \$ 6,174 | \$ 286,659 | -15.2% | | | | | | | | |
| 342.00 Fuel Holders and Accessories | 407,203 | 28,008 | 379,195 | -51.4% | | | | | | | (14,396) | -10.1% |
| 343.00 Prime Movers | 3,430,872 | 291,861 | 3,139,011 | -33.4% | | | | | | | (97,482) | -9.3% |
| 345.00 Accessory Electric Equipment | 157,825 | 2,553 | 155,272 | 19.6% | | | | | | | 500 | 6.6% |
| 346.00 Miscellaneous Power Plant Equipment | 112,036 | 26,574 | 85,462 | 26.9% | | | | | | | 7,148 | 1.0% |
| Total Jamesstown Unit 1 | \$ 4,400,769 | \$ 355,170 | \$ 4,045,599 | -29.6% | | | | | | | \$(105,167) | -8.8% |
| Jamesstown Unit 2 | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 24,853 | \$ - | \$ 24,853 | | | | | | | | | |
| 342.00 Fuel Holders and Accessories | 186,610 | 149,841 | 36,769 | -5.4% | | | | | | | (1,743) | -7.0% |
| 343.00 Prime Movers | 4,287,461 | 257,656 | 4,029,805 | -12.4% | | | | | | | (2,576) | -5.7% |
| 345.00 Accessory Electric Equipment | 106,112 | 33,794 | 72,318 | 22.8% | | | | | | | (31,949) | -7.3% |
| 346.00 Miscellaneous Power Plant Equipment | 27,042 | 23,839 | 3,203 | 17.0% | | | | | | | 7,705 | 2.5% |
| Total Jamesstown Unit 2 | \$ 4,632,078 | \$ 465,130 | \$ 4,166,948 | -6.1% | | | | | | | \$(292,027) | -6.9% |

Statement D

OTTER TAIL POWER COMPANY

Average Net Salvage

| Account Description A | Additions B | | Plant Investment C | | Survivors D-B-C | | Salvage Rate E | | Realized G-E-C | | Net Salvage Future H-F-D | | Total I-G-H | Average Rate J-I/B |
|---|-----------------------|---------------------|-----------------------|---------------|---------------------|-----------------------|-----------------------|---------------|-------------------|--|--------------------------------|--|--------------------|--------------------------|
| | | | | | | | | | | | | | | |
| Lake Preston | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 293,405 | \$ 13,679 | \$ 279,726 | -10.7% | \$ (1,464) | \$ (23,237) | \$ (23,701) | -8.1% | | | | | (23,701) | -8.1% |
| 342.00 Fuel Holders and Accessories | 373,513 | 44,808 | 328,705 | -4.9% | (2,196) | (26,126) | (28,321) | -7.6% | | | | | (28,321) | -7.6% |
| 343.00 Prime Movers | 3,709,227 | 231,925 | 3,477,302 | -4.6% | (10,669) | (276,366) | (287,035) | -7.7% | | | | | (287,035) | -7.7% |
| 345.00 Accessory Electric Equipment | 418,651 | 18,557 | 400,094 | -3.2% | (594) | (31,795) | (32,389) | -7.7% | | | | | (32,389) | -7.7% |
| 346.00 Miscellaneous Power Plant Equipment | 25,227 | 3,905 | 21,322 | 65.8% | 2,569 | (1,694) | 875 | 3.5% | | | | | 875 | 3.5% |
| Total Lake Preston | \$ 4,820,023 | \$ 312,874 | \$ 4,507,149 | -3.9% | \$ (12,352) | \$ (358,219) | \$ (370,571) | -7.7% | | | | | (370,571) | -7.7% |
| Solvay Combustion Turbine | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,937,311 | \$ 30,010 | \$ 4,907,301 | -4.6% | \$ (1,380) | \$ (77,102) | \$ (78,482) | -1.6% | | | | | (78,482) | -1.6% |
| 342.00 Fuel Holders and Accessories | 1,137,866 | 33,011 | 1,104,855 | -1.6% | (17,359) | (17,359) | (17,359) | -1.5% | | | | | (17,359) | -1.5% |
| 343.00 Prime Movers | 25,886,452 | 3,972,151 | 21,914,301 | -2.7% | (107,248) | (344,236) | (451,484) | -1.7% | | | | | (451,484) | -1.7% |
| 345.00 Accessory Electric Equipment | 1,358,311 | 48,118 | 1,310,193 | -1.6% | (20,591) | (20,591) | (20,591) | -1.5% | | | | | (20,591) | -1.5% |
| 346.00 Miscellaneous Power Plant Equipment | 326,745 | 8,096 | 318,649 | -1.6% | (5,005) | (5,005) | (5,005) | -1.5% | | | | | (5,005) | -1.5% |
| Total Solvay Combustion Turbine | \$ 33,646,685 | \$ 4,091,386 | \$ 29,555,299 | -2.7% | \$ (108,629) | \$ (464,292) | \$ (572,921) | -1.7% | | | | | (572,921) | -1.7% |
| Astoria Station Combustion Turbine | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 25,452,349 | \$ - | \$ 25,452,349 | -2.2% | \$ - | \$ (552,801) | \$ (552,801) | -2.2% | | | | | (552,801) | -2.2% |
| 342.00 Fuel Holders and Accessories | 5,913,271 | 5,913,271 | 108,028,020 | -2.2% | (2,346,282) | (2,346,282) | (2,346,282) | -2.2% | | | | | (2,346,282) | -2.2% |
| 343.00 Prime Movers | 108,028,020 | 1,980 | 108,028,020 | -2.2% | (160,539) | (160,539) | (160,539) | -2.2% | | | | | (160,539) | -2.2% |
| 345.00 Accessory Electric Equipment | 7,391,588 | 1,478,318 | 1,478,318 | -2.2% | (32,108) | (32,108) | (32,108) | -2.2% | | | | | (32,108) | -2.2% |
| 346.00 Miscellaneous Power Plant Equipment | 1,478,318 | - | 1,478,318 | -2.2% | - | (3,220,162) | (3,220,162) | -2.2% | | | | | (3,220,162) | -2.2% |
| Total Astoria Station Combustion Turbine | \$ 148,263,546 | \$ - | \$ 148,263,546 | -2.2% | \$ - | \$ (3,220,162) | \$ (3,220,162) | -2.2% | | | | | (3,220,162) | -2.2% |
| WIND PRODUCTION | | | | | | | | | | | | | | |
| Ashtabula | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 3,248,290 | \$ - | \$ 3,248,290 | -6.4% | \$ - | \$ (208,397) | \$ (208,397) | -6.4% | | | | | (208,397) | -6.4% |
| 344.00 Generators | 110,103,861 | 4,177,693 | 105,926,168 | -6.4% | (6,795,846) | (6,795,846) | (6,795,846) | -6.2% | | | | | (6,795,846) | -6.2% |
| 345.00 Accessory Electric Equipment | 6,481,754 | 1,980 | 6,479,774 | -6.4% | (415,718) | (415,718) | (415,718) | -6.4% | | | | | (415,718) | -6.4% |
| 346.00 Miscellaneous Power Plant Equipment | 131,848 | 28,417 | 103,431 | -6.4% | (6,638) | (6,638) | (6,638) | -5.0% | | | | | (6,638) | -5.0% |
| Total Ashtabula | \$ 119,965,753 | \$ 4,208,090 | \$ 115,757,663 | -6.4% | \$ - | \$ (7,426,599) | \$ (7,426,599) | -6.2% | | | | | (7,426,599) | -6.2% |
| Ashtabula III | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,027,787 | \$ - | \$ 4,027,787 | -12.2% | \$ - | \$ (490,940) | \$ (490,940) | -12.2% | | | | | (490,940) | -12.2% |
| 344.00 Generators | 70,688,754 | 7,024,753 | 70,688,754 | -12.2% | (856,235) | (856,235) | (856,235) | -12.2% | | | | | (856,235) | -12.2% |
| 345.00 Accessory Electric Equipment | 7,024,753 | 222,806 | 222,806 | -12.2% | (27,157) | (27,157) | (27,157) | -12.2% | | | | | (27,157) | -12.2% |
| 346.00 Miscellaneous Power Plant Equipment | 222,806 | - | 222,806 | -12.2% | - | (9,990,464) | (9,990,464) | -12.2% | | | | | (9,990,464) | -12.2% |
| Total Ashtabula III | \$ 81,964,100 | \$ - | \$ 81,964,100 | -12.2% | \$ - | \$ (9,990,464) | \$ (9,990,464) | -12.2% | | | | | (9,990,464) | -12.2% |
| Langdon | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,484,069 | \$ - | \$ 2,484,069 | -7.6% | \$ (111,162) | \$ (188,160) | \$ (188,160) | -7.6% | | | | | (188,160) | -7.6% |
| 344.00 Generators | 72,318,926 | 2,779,043 | 69,539,883 | -7.4% | (5,378,677) | (5,378,677) | (5,378,677) | -7.4% | | | | | (5,378,677) | -7.4% |
| 345.00 Accessory Electric Equipment | 8,327,422 | 47,957 | 8,327,422 | -7.6% | (630,831) | (630,831) | (630,831) | -7.6% | | | | | (630,831) | -7.6% |
| 346.00 Miscellaneous Power Plant Equipment | 166,747 | 118,790 | 118,790 | -7.6% | (9,002) | (9,002) | (9,002) | -5.4% | | | | | (9,002) | -5.4% |
| Total Langdon | \$ 83,297,164 | \$ 2,827,000 | \$ 80,470,164 | -7.6% | \$ (111,162) | \$ (6,095,509) | \$ (6,206,671) | -7.5% | | | | | (6,206,671) | -7.5% |

Statement D

OTTER TAIL POWER COMPANY

Average Net Salvage

| Account Description A | Additions B | | Plant Investment C | | Survivors D-B-C | | Salvage Rate E | | Realized F | | Net Salvage H-F-D | | Total I-G+H | | Average Rate J-I/B |
|--|----------------|--------------|-----------------------|----------------|--------------------|--|-------------------|--------|---------------|-----------------|----------------------|-----------------|----------------|--------------|--------------------------|
| | | | | | | | Realized | Future | Realized | Future | Future | Future | Total | Total | Rate |
| Luverne | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 2,266,581 | \$ - | \$ - | \$ 2,266,581 | | | -27.5% | -10.5% | \$ - | \$ (238,383) | \$ (238,383) | \$ (238,383) | (8,055,089) | (238,383) | -10.5% |
| 344.00 Generators | 70,763,781 | 3,605,301 | | 67,158,480 | | | | -10.5% | (991,458) | (7,063,631) | (7,063,631) | (8,055,089) | (511,544) | (8,055,089) | -11.4% |
| 345.00 Accessory Electric Equipment | 4,863,837 | | | 4,863,837 | | | | -10.5% | | (511,544) | (511,544) | (15,709) | (15,709) | (15,709) | -10.5% |
| 346.00 Miscellaneous Power Plant Equipment | 192,902 | 43,640 | | 149,262 | | | | -10.5% | | (15,709) | (15,709) | (15,709) | (15,709) | (15,709) | -8.1% |
| Total Luverne | \$ 78,087,101 | \$ 3,648,941 | \$ - | \$ 74,438,160 | | | -27.2% | -10.5% | \$ (991,458) | \$ (7,829,267) | \$ (8,820,725) | \$ (8,820,725) | (22,000,327) | (8,820,725) | -11.3% |
| Merricourt | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 7,960,903 | \$ - | \$ - | \$ 7,960,903 | | | | -8.4% | \$ - | \$ (671,346) | \$ (671,346) | \$ (671,346) | (19,785,138) | (671,346) | -8.4% |
| 344.00 Generators | 234,615,570 | | | 234,615,570 | | | | -8.4% | | (19,785,138) | (19,785,138) | (1,538,844) | (1,538,844) | (1,538,844) | -8.4% |
| 345.00 Accessory Electric Equipment | 18,247,878 | | | 18,247,878 | | | | -8.4% | | (4,999) | (4,999) | (4,999) | (4,999) | (4,999) | -8.4% |
| 346.00 Miscellaneous Power Plant Equipment | 59,264 | | | 59,264 | | | | -8.4% | | (4,999) | (4,999) | (4,999) | (4,999) | (4,999) | -8.4% |
| Total Merricourt | \$ 260,883,615 | \$ - | \$ - | \$ 260,883,615 | | | -8.4% | -8.4% | \$ - | \$ (22,000,327) | \$ (22,000,327) | \$ (22,000,327) | (22,000,327) | (22,000,327) | -8.4% |
| SOLAR PRODUCTION | | | | | | | | | | | | | | | |
| Jamestown | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 17,105 | \$ - | \$ - | \$ 17,105 | | | | -1.0% | \$ - | \$ (171) | \$ (171) | \$ (171) | (1,515) | (171) | -1.0% |
| 345.00 Accessory Electric Equipment | 151,476 | | | 151,476 | | | | -1.0% | | (1,515) | (1,515) | (1,515) | (1,515) | (1,515) | -1.0% |
| Total Jamestown | \$ 168,581 | \$ - | \$ - | \$ 168,581 | | | -1.0% | -1.0% | \$ - | \$ (1,686) | \$ (1,686) | \$ (1,686) | (1,686) | (1,686) | -1.0% |
| Hoot Lake | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,837,841 | \$ - | \$ - | \$ 1,837,841 | | | | -12.7% | \$ - | \$ (232,976) | \$ (232,976) | \$ (232,976) | (7,222,246) | (232,976) | -12.7% |
| 345.00 Accessory Electric Equipment | 56,973,080 | | | 56,973,080 | | | | -12.7% | | (7,222,246) | (7,222,246) | (7,222,246) | (7,222,246) | (7,222,246) | -12.7% |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | | | 612,614 | | | | -12.7% | | (77,659) | (77,659) | (77,659) | (77,659) | (77,659) | -12.7% |
| Total Hoot Lake | \$ 59,423,535 | \$ - | \$ - | \$ 59,423,535 | | | -12.7% | -12.7% | \$ - | \$ (7,532,880) | \$ (7,532,880) | \$ (7,532,880) | (7,532,880) | (7,532,880) | -12.7% |
| Rush Lake | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 13,536 | \$ - | \$ - | \$ 13,536 | | | | -1.0% | \$ - | \$ (135) | \$ (135) | \$ (135) | (1,426) | (135) | -1.0% |
| 345.00 Accessory Electric Equipment | 142,586 | | | 142,586 | | | | -1.0% | | (1,426) | (1,426) | (1,426) | (1,426) | (1,426) | -1.0% |
| Total Rush Lake | \$ 156,122 | \$ - | \$ - | \$ 156,122 | | | -1.0% | -1.0% | \$ - | \$ (1,561) | \$ (1,561) | \$ (1,561) | (1,561) | (1,561) | -1.0% |

Statement E

OTTER TAIL POWER COMPANY

Future Net Salvage

| Account Description A | 12/31/23 Plant Investment B | | Future Retirements C | | Net Salvage Rate E | | Interim G=C+E | | Future Net Salvage H=DF | | Future Rate J=IB |
|--|--------------------------------------|----------------------|-------------------------|-----------------------|-----------------------|--------------|-----------------------|------------------------|----------------------------|------------------------|------------------------|
| | | | Interim C | Final D=B-C | Interim E | Final F | Interim G=C+E | Final H=DF | Interim I=GH | Final J=IB | |
| STEAM PRODUCTION | | | | | | | | | | | |
| Big Stone | | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 80,758,219 | \$ 4,657,782 | \$ 1,643,856 | \$ 33,360,460 | -10.0% | -8.4% | \$ (164,386) | \$ (2,808,040) | \$ (4,140,922) | \$ (4,606,700) | -5.7% |
| 312.00 Boiler Plant Equipment | 201,385,686 | 11,525,191 | 4,955,771 | 102,496,193 | -10.0% | -8.4% | (495,577) | (8,627,380) | (1,152,519) | (1,483,570) | -5.7% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | | | | |
| 314.00 Turbogenerator Units | 31,809,484 | 1,871,337 | 1,191,553 | 25,017,994 | -10.0% | -8.4% | (119,155) | (2,105,832) | (187,134) | (1,816,185) | -5.7% |
| 315.00 Accessory Electric Equipment | 21,066,041 | 1,226,962 | 568,888 | 11,616,215 | -10.0% | -8.4% | (56,889) | (977,768) | (122,696) | (1,202,218) | -5.7% |
| 316.00 Miscellaneous Power Plant Equipment | 3,617,809 | 211,161 | 108,856 | 2,315,588 | -10.0% | -8.4% | (10,886) | (194,909) | (21,116) | (185,369) | -5.7% |
| Total Big Stone | \$ 338,637,239 | \$ 19,492,434 | \$ 19,492,434 | \$ 319,144,805 | -10.0% | -5.4% | \$ (1,949,243) | \$ (17,365,916) | \$ (4,140,922) | \$ (19,315,159) | -5.7% |
| Coyote | | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 35,004,316 | \$ 1,643,856 | \$ 1,643,856 | \$ 33,360,460 | -10.0% | -8.4% | \$ (164,386) | \$ (2,808,040) | \$ (2,808,040) | \$ (2,972,425) | -8.5% |
| 312.00 Boiler Plant Equipment | 107,451,964 | 4,955,771 | 4,955,771 | 102,496,193 | -10.0% | -8.4% | (495,577) | (8,627,380) | (8,627,380) | (9,122,957) | -8.5% |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | | | | |
| 314.00 Turbogenerator Units | 26,209,547 | 1,191,553 | 1,191,553 | 25,017,994 | -10.0% | -8.4% | (119,155) | (2,105,832) | (2,105,832) | (2,224,987) | -8.5% |
| 315.00 Accessory Electric Equipment | 12,185,103 | 568,888 | 568,888 | 11,616,215 | -10.0% | -8.4% | (56,889) | (977,768) | (56,889) | (1,034,657) | -8.5% |
| 316.00 Miscellaneous Power Plant Equipment | 2,424,444 | 108,856 | 108,856 | 2,315,588 | -10.0% | -8.4% | (10,886) | (194,909) | (10,886) | (205,795) | -8.5% |
| Total Coyote | \$ 183,275,374 | \$ 8,468,924 | \$ 8,468,924 | \$ 174,806,450 | -10.0% | -8.4% | \$ (846,892) | \$ (14,713,929) | \$ (846,892) | \$ (15,560,821) | -8.5% |
| OTHER PRODUCTION | | | | | | | | | | | |
| Jamestown | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 311,512 | \$ 13,615 | \$ 13,615 | \$ 297,897 | -5.0% | -7.1% | \$ (881) | \$ (21,155) | \$ (881) | \$ (21,836) | -7.0% |
| 342.00 Fuel Holders and Accessories | 415,964 | 17,946 | 17,946 | 398,018 | -5.0% | -7.1% | (897) | (28,265) | (897) | (29,162) | -7.0% |
| 343.00 Prime Movers | 7,168,816 | 317,479 | 6,851,337 | 6,851,337 | -5.0% | -7.1% | (15,874) | (486,544) | (15,874) | (502,418) | -7.0% |
| 345.00 Accessory Electric Equipment | 227,590 | 10,067 | 10,067 | 217,523 | -5.0% | -7.1% | (503) | (15,447) | (503) | (15,951) | -7.0% |
| 346.00 Miscellaneous Power Plant Equipment | 88,665 | 3,702 | 3,702 | 84,963 | -5.0% | -7.1% | (185) | (6,034) | (185) | (6,219) | -7.0% |
| Total Jamestown | \$ 8,212,547 | \$ 362,808 | \$ 362,808 | \$ 7,849,739 | -5.0% | -7.1% | \$ (18,140) | \$ (557,445) | \$ (18,140) | \$ (575,585) | -7.0% |
| Jamestown Unit 1 | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 286,659 | \$ 12,564 | \$ 12,564 | \$ 274,095 | -5.0% | -7.1% | \$ (628) | \$ (19,465) | \$ (628) | \$ (20,093) | -7.0% |
| 342.00 Fuel Holders and Accessories | 379,195 | 16,291 | 16,291 | 362,904 | -5.0% | -7.1% | (815) | (25,771) | (815) | (26,586) | -7.0% |
| 343.00 Prime Movers | 3,139,011 | 138,378 | 3,000,633 | 3,000,633 | -5.0% | -7.1% | (6,919) | (213,088) | (6,919) | (220,007) | -7.0% |
| 345.00 Accessory Electric Equipment | 155,272 | 7,063 | 7,063 | 148,209 | -5.0% | -7.1% | (353) | (10,525) | (353) | (10,878) | -7.0% |
| 346.00 Miscellaneous Power Plant Equipment | 85,462 | 3,560 | 3,560 | 81,902 | -5.0% | -7.1% | (178) | (5,816) | (178) | (5,994) | -7.0% |
| Total Jamestown Unit 1 | \$ 4,045,599 | \$ 177,856 | \$ 177,856 | \$ 3,867,743 | -5.0% | -7.1% | \$ (8,893) | \$ (274,665) | \$ (8,893) | \$ (283,558) | -7.0% |
| Jamestown Unit 2 | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 24,853 | \$ 1,051 | \$ 1,051 | \$ 23,802 | -5.0% | -7.1% | \$ (53) | \$ (1,690) | \$ (53) | \$ (1,743) | -7.0% |
| 342.00 Fuel Holders and Accessories | 36,769 | 1,655 | 1,655 | 35,114 | -5.0% | -7.1% | (83) | (2,494) | (83) | (2,576) | -7.0% |
| 343.00 Prime Movers | 4,029,805 | 179,101 | 3,850,704 | 3,850,704 | -5.0% | -7.1% | (8,955) | (273,455) | (8,955) | (282,410) | -7.0% |
| 345.00 Accessory Electric Equipment | 72,318 | 3,004 | 69,314 | 69,314 | -5.0% | -7.1% | (150) | (4,922) | (150) | (5,073) | -7.0% |
| 346.00 Miscellaneous Power Plant Equipment | 3,203 | 142 | 3,061 | 3,061 | -5.0% | -7.1% | (7) | (217) | (7) | (224) | -7.0% |
| Total Jamestown Unit 2 | \$ 4,166,948 | \$ 184,952 | \$ 184,952 | \$ 3,981,996 | -5.0% | -7.1% | \$ (9,248) | \$ (282,779) | \$ (9,248) | \$ (292,027) | -7.0% |

Statement E

OTTER TAIL POWER COMPANY

Future Net Salvage

| Account Description A | 12/31/23 Plant Investment B | | Future Retirements C | | Net Salvage Rate E | | Interim Salvage Rate F | | Future Net Salvage H | | Future Rate J=I/B |
|---|-----------------------------------|---------------|-------------------------|-------|-----------------------|--------------|---------------------------|----------------|-------------------------|--|----------------------|
| | B | | C | | E | F | G=C-E | HED+F | I=G+H | | |
| Lake Preston | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 279,726 | \$ 12,228 | \$ 267,498 | -5.0% | -8.1% | \$ (611) | \$ (21,626) | \$ (22,237) | -7.9% | | |
| 342.00 Fuel Holders and Accessories | 328,705 | 14,536 | 314,169 | -5.0% | -8.1% | (727) | (25,399) | (26,126) | -7.9% | | |
| 343.00 Prime Movers | 3,477,302 | 154,128 | 3,323,174 | -5.0% | -8.1% | (7,706) | (268,660) | (276,366) | -7.9% | | |
| 345.00 Accessory Electric Equipment | 400,094 | 17,834 | 382,260 | -5.0% | -8.1% | (892) | (30,904) | (31,795) | -7.9% | | |
| 346.00 Miscellaneous Power Plant Equipment | 21,322 | 952 | 20,370 | -5.0% | -8.1% | (48) | (1,647) | (1,694) | -7.9% | | |
| Total Lake Preston | \$ 4,507,149 | \$ 199,678 | \$ 4,307,471 | -5.0% | -8.1% | \$ (9,984) | \$ (348,235) | \$ (358,219) | -7.9% | | |
| Solway Combustion Turbine | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 4,907,301 | \$ 180,037 | \$ 4,727,264 | -5.0% | -1.4% | \$ (9,002) | \$ (68,100) | \$ (77,102) | -1.6% | | |
| 342.00 Fuel Holders and Accessories | 1,104,855 | 40,522 | 1,064,333 | -5.0% | -1.4% | (2,026) | (15,333) | (17,359) | -1.6% | | |
| 343.00 Prime Movers | 21,914,301 | 801,913 | 21,112,388 | -5.0% | -1.4% | (40,096) | (304,140) | (344,236) | -1.6% | | |
| 345.00 Accessory Electric Equipment | 1,310,193 | 48,216 | 1,261,977 | -5.0% | -1.4% | (2,411) | (18,180) | (20,591) | -1.6% | | |
| 346.00 Miscellaneous Power Plant Equipment | 318,649 | 11,660 | 306,989 | -5.0% | -1.4% | (583) | (4,422) | (5,005) | -1.6% | | |
| Total Solway Combustion Turbine | \$ 29,555,299 | \$ 1,082,348 | \$ 28,472,951 | -5.0% | -1.4% | \$ (54,117) | \$ (410,175) | \$ (464,292) | -1.6% | | |
| Astoria Station Combustion Turbine | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 25,452,349 | \$ 2,048,869 | \$ 23,403,480 | -5.0% | -1.9% | \$ (102,443) | \$ (450,357) | \$ (552,801) | -2.2% | | |
| 342.00 Fuel Holders and Accessories | 5,913,271 | 476,038 | 5,437,233 | -5.0% | -1.9% | (23,802) | (104,630) | (128,432) | -2.2% | | |
| 343.00 Prime Movers | 108,028,020 | 8,696,580 | 99,331,440 | -5.0% | -1.9% | (434,829) | (1,911,453) | (2,346,282) | -2.2% | | |
| 345.00 Accessory Electric Equipment | 7,391,588 | 595,047 | 6,796,541 | -5.0% | -1.9% | (29,752) | (130,787) | (160,539) | -2.2% | | |
| 346.00 Miscellaneous Power Plant Equipment | 1,478,318 | 119,009 | 1,359,309 | -5.0% | -1.9% | (5,950) | (26,157) | (32,108) | -2.2% | | |
| Total Astoria Station Combustion Turbine | \$ 148,263,546 | \$ 11,935,543 | \$ 136,328,003 | -5.0% | -1.9% | \$ (596,777) | \$ (2,623,385) | \$ (3,220,162) | -2.2% | | |
| WIND PRODUCTION | | | | | | | | | | | |
| Ashtabula | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$3,248,290 | \$160,514 | \$ 3,087,776 | -5.0% | -6.5% | \$ (8,026) | \$ (200,371) | \$ (208,397) | -6.4% | | |
| 344.00 Generators | 105,926,168 | 5,229,528 | 100,696,640 | -5.0% | -6.5% | (261,476) | (6,534,370) | (6,795,846) | -6.4% | | |
| 345.00 Accessory Electric Equipment | 6,479,774 | 319,981 | 6,159,793 | -5.0% | -6.5% | (15,999) | (399,719) | (415,718) | -6.4% | | |
| 346.00 Miscellaneous Power Plant Equipment | 103,431 | 4,958 | 98,473 | -5.0% | -6.5% | (248) | (6,390) | (6,638) | -6.4% | | |
| Total Ashtabula | \$ 115,757,663 | \$ 5,714,981 | \$ 110,042,682 | -5.0% | -6.5% | \$ (285,749) | \$ (7,140,850) | \$ (7,426,599) | -6.4% | | |
| Ashtabula III | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$4,027,787 | \$241,970 | \$ 3,785,817 | -5.0% | -12.6% | \$ (12,099) | \$ (478,842) | \$ (490,940) | -12.2% | | |
| 344.00 Generators | 70,688,754 | 4,246,644 | 66,442,110 | -5.0% | -12.6% | (212,332) | (8,403,799) | (8,616,131) | -12.2% | | |
| 345.00 Accessory Electric Equipment | 7,024,753 | 422,014 | 6,602,739 | -5.0% | -12.6% | (21,101) | (835,134) | (856,235) | -12.2% | | |
| 346.00 Miscellaneous Power Plant Equipment | 222,806 | 13,385 | 209,421 | -5.0% | -12.6% | (669) | (26,488) | (27,157) | -12.2% | | |
| Total Ashtabula III | \$ 81,964,100 | \$ 4,924,013 | \$ 77,040,087 | -5.0% | -12.6% | \$ (246,201) | \$ (9,744,263) | \$ (9,990,464) | -12.2% | | |

Statement E

OTTER TAIL POWER COMPANY

Future Net Salvage

| Account Description A | 12/31/23 Plant Investment B | | Future Retirements C | | Net Salvage Rate E | | Interim G=C-E | | Future Net Salvage H | | Future Rate J=I/B |
|--|-----------------------------------|----------------|-------------------------|----------------|-----------------------|------------|------------------|-----------------|-------------------------|-----------------|----------------------|
| | Investment | Final D=B-C | Interim | Final F | Interim | Final F | Interim | Final H=I-F | Interim | Final I=H+G | |
| Langdon | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$2,484,069 | \$ 2,367,476 | \$116,593 | \$ 2,367,476 | -5.0% | -7.7% | \$ (5,830) | \$ (182,330) | \$ (188,160) | \$ (188,160) | -7.6% |
| 344.00 Generators | 69,539,883 | 66,279,534 | 3,260,349 | 66,279,534 | -5.0% | -7.7% | (163,017) | (5,104,498) | (5,267,515) | (5,267,515) | -7.6% |
| 345.00 Accessory Electric Equipment | 8,327,422 | 7,938,655 | 388,767 | 7,938,655 | -5.0% | -7.7% | (19,438) | (611,393) | (630,831) | (630,831) | -7.6% |
| 346.00 Miscellaneous Power Plant Equipment | 118,790 | 113,377 | 5,413 | 113,377 | -5.0% | -7.7% | (271) | (8,732) | (9,002) | (9,002) | -7.6% |
| Total Langdon | \$ 80,470,164 | \$ 76,699,042 | \$ 3,771,122 | \$ 76,699,042 | -5.0% | -7.7% | \$ (188,556) | \$ (5,906,953) | \$ (6,095,509) | \$ (6,095,509) | -7.6% |
| Luverne | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$2,266,581 | \$ 2,148,989 | \$117,592 | \$ 2,148,989 | -5.0% | -10.8% | \$ (5,880) | \$ (232,503) | \$ (238,383) | \$ (238,383) | -10.5% |
| 344.00 Generators | 67,158,480 | 63,680,727 | 3,477,753 | 63,680,727 | -5.0% | -10.8% | (173,888) | (6,889,743) | (7,063,631) | (7,063,631) | -10.5% |
| 345.00 Accessory Electric Equipment | 4,863,837 | 4,611,502 | 252,335 | 4,611,502 | -5.0% | -10.8% | (12,617) | (498,927) | (511,544) | (511,544) | -10.5% |
| 346.00 Miscellaneous Power Plant Equipment | 149,262 | 141,709 | 7,553 | 141,709 | -5.0% | -10.8% | (378) | (15,332) | (15,709) | (15,709) | -10.5% |
| Total Luverne | \$ 74,438,160 | \$ 70,582,927 | \$ 3,855,233 | \$ 70,582,927 | -5.0% | -10.8% | \$ (192,762) | \$ (7,636,506) | \$ (7,829,267) | \$ (7,829,267) | -10.5% |
| Merricourt | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$7,960,903 | \$ 7,338,568 | \$622,335 | \$ 7,338,568 | -5.0% | -8.7% | \$ (31,117) | \$ (640,229) | \$ (671,346) | \$ (671,346) | -8.4% |
| 344.00 Generators | 234,615,570 | 216,272,326 | 18,343,244 | 216,272,326 | -5.0% | -8.7% | (917,162) | (18,867,975) | (19,785,138) | (19,785,138) | -8.4% |
| 345.00 Accessory Electric Equipment | 18,247,878 | 16,821,181 | 1,426,697 | 16,821,181 | -5.0% | -8.7% | (71,335) | (1,467,509) | (1,538,844) | (1,538,844) | -8.4% |
| 346.00 Miscellaneous Power Plant Equipment | 59,264 | 54,663 | 4,601 | 54,663 | -5.0% | -8.7% | (230) | (4,769) | (4,999) | (4,999) | -8.4% |
| Total Merricourt | \$ 260,883,615 | \$ 240,486,738 | \$ 20,396,877 | \$ 240,486,738 | -5.0% | -8.7% | \$ (1,019,844) | \$ (20,980,483) | \$ (22,000,327) | \$ (22,000,327) | -8.4% |
| SOLAR PRODUCTION | | | | | | | | | | | |
| Jamestown | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 17,105 | \$ 16,199 | \$ 906 | \$ 16,199 | -1.0% | -1.0% | \$ (9) | \$ (162) | \$ (171) | \$ (171) | -1.0% |
| 345.00 Accessory Electric Equipment | 151,476 | 143,453 | 8,023 | 143,453 | -1.0% | -1.0% | (80) | (1,435) | (1,515) | (1,515) | -1.0% |
| Total Jamestown | \$ 168,581 | \$ 159,652 | \$ 8,929 | \$ 159,652 | -1.0% | -1.0% | \$ (89) | \$ (1,597) | \$ (1,686) | \$ (1,686) | -1.0% |
| Hoot Lake | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 1,837,841 | \$ 1,681,429 | \$ 156,412 | \$ 1,681,429 | -1.0% | -13.8% | \$ (1,564) | \$ (231,412) | \$ (232,976) | \$ (232,976) | -12.7% |
| 345.00 Accessory Electric Equipment | 56,973,080 | 52,124,297 | 4,848,783 | 52,124,297 | -1.0% | -13.8% | (48,488) | (7,173,758) | (7,222,246) | (7,222,246) | -12.7% |
| 346.00 Miscellaneous Power Plant Equipment | 612,614 | 560,477 | 52,137 | 560,477 | -1.0% | -13.8% | (521) | (77,137) | (77,659) | (77,659) | -12.7% |
| Total Hoot Lake | \$ 59,423,535 | \$ 54,366,202 | \$ 5,057,333 | \$ 54,366,202 | -1.0% | -13.8% | \$ (50,573) | \$ (7,482,307) | \$ (7,532,880) | \$ (7,532,880) | -12.7% |
| Rush Lake | | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 13,536 | \$ 12,819 | \$ 717 | \$ 12,819 | -1.0% | -1.0% | \$ (7) | \$ (128) | \$ (135) | \$ (135) | -1.0% |
| 345.00 Accessory Electric Equipment | 142,586 | 135,034 | 7,552 | 135,034 | -1.0% | -1.0% | (76) | (1,350) | (1,426) | (1,426) | -1.0% |
| Total Rush Lake | \$ 156,122 | \$ 147,853 | \$ 8,269 | \$ 147,853 | -1.0% | -1.0% | \$ (83) | \$ (1,479) | \$ (1,561) | \$ (1,561) | -1.0% |
| GENERAL PLANT | | | | | | | | | | | |
| 390.10 General Office Buildings | \$ 6,451,486 | \$ 6,171,358 | \$ 280,128 | \$ 6,171,358 | -5.0% | 48.8% | \$ (14,006) | \$ 3,013,171 | \$ 2,999,165 | \$ 2,999,165 | 46.5% |
| 390.20 Fleet Service Center Building | 896,880 | 845,949 | 50,931 | 845,949 | -5.0% | 63.0% | (2,547) | 532,992 | 530,445 | 530,445 | 59.1% |
| 390.25 Fleet Service Center - Jamestown | 2,154,593 | 1,854,967 | 299,626 | 1,854,967 | -5.0% | 177.7% | (14,981) | 3,296,527 | 3,281,546 | 3,281,546 | 152.3% |
| 390.30 Central Stores Building | 4,494,284 | 4,233,223 | 261,061 | 4,233,223 | -5.0% | 89.1% | (13,053) | 3,773,488 | 3,760,435 | 3,760,435 | 83.7% |
| Total General Plant | \$ 13,997,243 | \$ 13,105,497 | \$ 891,746 | \$ 13,105,497 | -5.0% | 81.0% | \$ (44,587) | \$ 10,616,178 | \$ 10,571,591 | \$ 10,571,591 | 75.5% |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description | Current Parameters | | | | | | Updated Parameters | | | | | |
|--|--------------------|----------------|-----------|--------------|--------------|--------------|--------------------|----------------|-----------|--------------|--------------|--------------|
| | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. |
| A | B | C | D | E | F | G | H | I | J | K | L | M |
| INTANGIBLE PLANT | | | | | | | | | | | | |
| 303.91 Software - 5 Year | 5.00 | SQ | 5.00 | 1.85 | | -6.5 | 5.00 | SQ | 5.00 | 3.12 | | -6.5 |
| 303.92 Software - 10 Year | 10.00 | SQ | 10.00 | 6.93 | | -6.8 | 10.00 | SQ | 10.00 | 6.44 | | -6.7 |
| Total Intangible Plant | | | 8.48 | 5.39 | | | 8.48 | | | 5.43 | | |
| STEAM PRODUCTION | | | | | | | | | | | | |
| 311.00 Structures and Improvements | | | 37.95 | 21.68 | | -6.5 | | | 37.88 | 20.73 | | -6.5 |
| 312.00 Boiler Plant Equipment | | | 34.51 | 21.33 | | -8.6 | | | 34.30 | 20.40 | | -8.6 |
| 312.10 Boiler Plant Equipment - Landfill | | | 35.97 | 27.46 | | | | | 37.94 | 29.31 | | |
| 314.00 Turbogenerator Units | | | 39.50 | 20.58 | | -1.1 | | | 37.41 | 19.50 | | -1.3 |
| 315.00 Accessory Electric Equipment | | | 39.74 | 21.30 | | -6.7 | | | 39.69 | 20.34 | | -6.7 |
| 316.00 Miscellaneous Power Plant Equipment | | | 33.16 | 20.58 | | -2.4 | | | 32.65 | 19.71 | | -2.2 |
| Total Steam Production Plant | | | 36.02 | 21.44 | | -7.0 | | | 35.71 | 20.54 | | -7.0 |
| HYDRAULIC PRODUCTION | | | | | | | | | | | | |
| 331.00 Structures and Improvements | | | 54.80 | 37.44 | | -0.2 | | | 43.94 | 36.61 | | -0.3 |
| 332.00 Reservoirs, Dams and Waterways | | | 46.17 | 37.50 | | -13.0 | | | 46.59 | 36.59 | | -16.4 |
| 333.00 Water Wheels, Turbines & Generators | | | 52.79 | 37.46 | | -6.4 | | | 52.83 | 36.56 | | -6.4 |
| 334.00 Accessory Electric Equipment | | | 47.29 | 37.50 | | 0.2 | | | 42.76 | 36.62 | | 0.2 |
| 335.00 Miscellaneous Power Plant Equipment | | | 49.47 | 37.48 | | 0.1 | | | 49.55 | 36.58 | | 0.1 |
| Total Hydraulic Production Plant | | | 49.87 | 37.47 | | -7.8 | | | 46.21 | 36.59 | | -9.7 |
| OTHER PRODUCTION | | | | | | | | | | | | |
| 341.00 Structures and Improvements | | | 33.05 | 28.81 | | -2.2 | | | 33.07 | 28.03 | | -2.2 |
| 342.00 Fuel Holders and Accessories | | | 32.17 | 26.86 | | -2.8 | | | 33.46 | 27.28 | | -2.6 |
| 343.00 Prime Movers | | | 33.37 | 27.99 | | -2.5 | | | 33.22 | 27.25 | | -2.5 |
| 345.00 Accessory Electric Equipment | | | 33.69 | 28.39 | | -2.3 | | | 34.01 | 27.95 | | -2.5 |
| 346.00 Miscellaneous Power Plant Equipment | | | 32.22 | 27.44 | | -1.6 | | | 32.76 | 27.19 | | -1.6 |
| Total Other Production Plant | | | 33.27 | 27.99 | | -2.5 | | | 33.24 | 27.41 | | -2.4 |
| WIND PRODUCTION | | | | | | | | | | | | |
| 341.00 Structures and Improvements | | | 33.95 | 25.40 | | -9.0 | | | 31.17 | 24.40 | | -9.0 |
| 344.00 Generators | | | 33.58 | 25.29 | | -8.7 | | | 31.68 | 24.36 | | -8.7 |
| 345.00 Accessory Electric Equipment | | | 33.82 | 25.32 | | -8.8 | | | 31.11 | 24.12 | | -8.8 |
| 346.00 Miscellaneous Power Plant Equipment | | | 23.34 | 20.26 | | -8.2 | | | 24.07 | 21.45 | | -9.7 |
| Total Wind Production Plant | | | 33.61 | 25.32 | | -8.7 | | | 31.61 | 24.34 | | -8.7 |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description | Current Parameters | | | | | | | | | | Updated Parameters | | | | | | | | | |
|--|--------------------|----------------|-----------|--------------|--------------|--------------|-----------------|----------------|-----------|--------------|--------------------|--------------|-----------------|----------------|-----------|--------------|--------------|--------------|---|---|
| | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T |
| | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | | |
| SOLAR PRODUCTION | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | | | 24.23 | 21.86 | -11.9 | -11.9 | | | 33.26 | 32.74 | -12.5 | -12.5 | | | | | | | | |
| 345.00 Accessory Electric Equipment | | | 24.23 | 21.86 | -12.0 | -12.0 | | | 33.40 | 33.01 | -12.6 | -12.6 | | | | | | | | |
| 346.00 Miscellaneous Power Plant Equipment | | | 24.23 | 21.86 | -12.1 | -12.1 | | | 33.47 | 33.01 | -12.7 | -12.7 | | | | | | | | |
| Total Solar Production Plant | | | 34.92 | 34.90 | -12.0 | -12.0 | | | 33.40 | 32.92 | -12.6 | -12.6 | | | | | | | | |
| TRANSMISSION PLANT | | | | | | | | | | | | | | | | | | | | |
| 353.00 Station Equipment | 65.00 | R1 | 65.12 | 56.05 | -1.8 | -5.0 | 65.00 | R1 | 65.14 | 55.63 | -1.9 | -5.0 | | | | | | | | |
| 354.00 Towers and Fixtures | 80.00 | R5 | 80.00 | 73.24 | -10.0 | -10.0 | 80.00 | R5 | 80.00 | 72.24 | -10.0 | -10.0 | | | | | | | | |
| 355.00 Poles and Fixtures | 80.00 | R2 | 80.18 | 65.47 | -46.6 | -50.0 | 80.00 | R2 | 80.18 | 65.33 | -46.3 | -50.0 | | | | | | | | |
| 356.00 Overhead Conductors and Devices | 80.00 | R2 | 80.04 | 67.29 | -27.6 | -30.0 | 80.00 | R2 | 80.04 | 67.09 | -27.7 | -30.0 | | | | | | | | |
| 358.00 Underground Conductors and Devices | 50.00 | S4 | 51.17 | 21.21 | -6.7 | -5.0 | 50.00 | S4 | 51.88 | 11.50 | -7.3 | -5.0 | | | | | | | | |
| Total Transmission Plant | | | 75.70 | 65.07 | -21.0 | -23.1 | | | 75.70 | 64.62 | -21.0 | -23.1 | | | | | | | | |
| DISTRIBUTION PLANT | | | | | | | | | | | | | | | | | | | | |
| 362.00 Station Equipment | 45.00 | SC | 45.40 | 36.35 | -1.5 | -5.0 | 45.00 | SC | 45.41 | 36.38 | -1.6 | -5.0 | | | | | | | | |
| 364.00 Poles, Towers and Fixtures | 72.00 | R3 | 72.07 | 50.49 | -124.7 | -125.0 | 72.00 | R3 | 72.07 | 50.55 | -125.0 | -125.0 | | | | | | | | |
| 365.00 Overhead Conductors and Devices | 68.00 | R2.5 | 68.13 | 46.05 | -70.1 | -70.0 | 68.00 | R2.5 | 68.13 | 46.31 | -70.2 | -70.0 | | | | | | | | |
| 367.00 Underground Conductors and Devices | 50.00 | S2 | 50.07 | 36.33 | -4.8 | -5.0 | 50.00 | S2 | 50.07 | 37.78 | -4.9 | -5.0 | | | | | | | | |
| 368.00 Line Transformers | 45.00 | S1.5 | 44.92 | 32.56 | 31.1 | 30.0 | 45.00 | S1.5 | 44.92 | 32.58 | 30.9 | 30.0 | | | | | | | | |
| 369.00 Overhead Services | 60.00 | S4 | 60.13 | 33.48 | -300.0 | -300.0 | 60.00 | S4 | 60.16 | 33.02 | -300.6 | -300.0 | | | | | | | | |
| 369.10 Underground Services | 55.00 | R4 | 55.08 | 37.18 | -50.0 | -50.0 | 55.00 | R4 | 55.09 | 37.00 | -50.0 | -50.0 | | | | | | | | |
| 370.00 Meters | 30.00 | L1 | 31.05 | 20.46 | 0.2 | | 30.00 | L1 | 31.10 | 20.00 | 0.1 | | | | | | | | | |
| 370.05 Smart Meters | 20.00 | S3 | 20.00 | 15.57 | | | 20.00 | S3 | 20.00 | 14.58 | | | | | | | | | | |
| 370.10 Load Management Switches | 20.00 | R5 | 20.21 | 3.72 | | | 20.00 | R5 | 20.45 | 3.12 | | | | | | | | | | |
| 371.10 Electric Vehicle Charging Stations | 10.00 | SQ | 10.00 | 6.50 | | | 10.00 | SQ | 10.00 | 5.50 | | | | | | | | | | |
| 371.20 Other Private Lighting | 21.00 | L0 | 20.94 | 17.41 | -3.4 | -5.0 | 21.00 | L0 | 20.94 | 17.17 | -3.7 | -5.0 | | | | | | | | |
| 373.00 Street Lighting and Signal Systems | 20.00 | L1 | 20.12 | 16.47 | -9.9 | -10.0 | 20.00 | L1 | 20.08 | 16.47 | -10.4 | -10.0 | | | | | | | | |
| Total Distribution Plant | | | 47.02 | 33.60 | -27.3 | -30.5 | | | 47.04 | 33.84 | -27.4 | -30.5 | | | | | | | | |
| GENERAL PLANT | | | | | | | | | | | | | | | | | | | | |
| Depreciable | | | | | | | | | | | | | | | | | | | | |
| 390.00 Structures and Improvements | 50.00 | R1 | 51.04 | 33.74 | 4.2 | | 50.00 | R1 | 51.01 | 34.67 | 4.5 | | | | | | | | | |
| 390.10 General Office Buildings | 2040 | 200-SC | 37.83 | 17.09 | 36.1 | 46.7 | 2040 | 200-SC | 37.58 | 16.14 | 36.0 | 46.5 | | | | | | | | |
| 390.20 Fleet Service Center Building | 2045 | 200-SC | 46.76 | 21.82 | 57.1 | 71.1 | 2045 | 200-SC | 39.54 | 20.89 | 48.5 | 59.1 | | | | | | | | |
| 390.25 Fleet Service Center - Jamestown | 2079 | 200-SC | 55.51 | 52.47 | 152.3 | 152.3 | 2079 | 200-SC | 55.52 | 51.61 | 152.3 | 152.3 | | | | | | | | |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description | Current Parameters | | | | | | Updated Parameters | | | | | |
|--|----------------------|---------------------|----------|-------------------|-------------------|-------------------|----------------------|---------------------|----------|-------------------|-------------------|-------------------|
| | A P-Life/ AYFR | B Curve Shape | C ASL | D Rem. Life | E Avg. Sal. | F Fut. Sal. | G P-Life/ AYFR | H Curve Shape | I ASL | J Rem. Life | K Avg. Sal. | L Fut. Sal. |
| 314.00 Turbogenerator Units | | | | | | | | | | | | |
| 315.00 Accessory Electric Equipment | | | | | | | | | | | | |
| 316.00 Miscellaneous Power Plant Equipment | | | | | | | | | | | | |
| Total Hoot Lake Units 2 and 3 | | | 35.97 | 27.46 | | | | | 37.94 | 29.31 | | |
| Coyote | | | | | | | | | | | | |
| 311.00 Structures and Improvements | 2041 | 200-SC | 49.23 | 18.03 | -8.1 | -8.6 | 2041 | 200-SC | 49.03 | 17.08 | -8.0 | -8.5 |
| 312.00 Boiler Plant Equipment | 2041 | 200-SC | 39.31 | 18.04 | -7.7 | -8.6 | 2041 | 200-SC | 39.09 | 17.09 | -7.7 | -8.5 |
| 312.10 Boiler Plant Equipment - Landfill | | | | | | | | | | | | |
| 314.00 Turbogenerator Units | 2041 | 200-SC | 37.21 | 18.05 | -8.6 | -8.6 | 2041 | 200-SC | 34.26 | 17.10 | -0.5 | -8.5 |
| 315.00 Accessory Electric Equipment | 2041 | 200-SC | 46.54 | 18.04 | -7.6 | -8.6 | 2041 | 200-SC | 46.24 | 17.08 | -7.5 | -8.5 |
| 316.00 Miscellaneous Power Plant Equipment | 2041 | 200-SC | 29.31 | 18.06 | -1.4 | -8.6 | 2041 | 200-SC | 29.09 | 17.10 | -1.0 | -8.5 |
| Total Coyote | | | 40.79 | 18.04 | -6.4 | -8.6 | | | 40.06 | 17.09 | -6.4 | -8.5 |
| HYDRAULIC PRODUCTION | | | | | | | | | | | | |
| Hoot Lake | | | | | | | | | | | | |
| 331.00 Structures and Improvements | 2062 | 200-SC | 97.24 | 37.15 | | | 2062 | 200-SC | 43.55 | 36.61 | -0.2 | |
| 332.00 Reservoirs, Dams and Waterways | 2062 | 200-SC | 49.08 | 37.48 | | | 2062 | 200-SC | 65.91 | 36.47 | -0.1 | |
| 333.00 Water Wheels, Turbines & Generators | 2062 | 200-SC | 72.91 | 37.34 | | | 2062 | 200-SC | 73.01 | 36.44 | | |
| 334.00 Accessory Electric Equipment | 2062 | 200-SC | 40.01 | 37.54 | | | 2062 | 200-SC | 38.32 | 36.64 | | |
| 335.00 Miscellaneous Power Plant Equipment | 2062 | 200-SC | 47.01 | 37.50 | | | 2062 | 200-SC | 49.17 | 36.58 | | |
| Total Hoot Lake | | | 56.53 | 37.43 | | | | | 44.08 | 36.61 | -0.1 | |
| Wright | | | | | | | | | | | | |
| 331.00 Structures and Improvements | 2062 | 200-SC | 69.85 | 37.35 | | | 2062 | 200-SC | 69.93 | 36.45 | | |
| 332.00 Reservoirs, Dams and Waterways | 2062 | 200-SC | 51.70 | 37.47 | 27.1 | | 2062 | 200-SC | 50.22 | 36.57 | 24.9 | |
| 333.00 Water Wheels, Turbines & Generators | 2062 | 200-SC | 48.98 | 37.49 | -3.6 | | 2062 | 200-SC | 49.01 | 36.58 | -3.6 | |
| 334.00 Accessory Electric Equipment | 2062 | 200-SC | 55.27 | 37.45 | 2.2 | | 2062 | 200-SC | 55.32 | 36.55 | 2.2 | |
| 335.00 Miscellaneous Power Plant Equipment | 2062 | 200-SC | 53.13 | 37.46 | -0.7 | | 2062 | 200-SC | 53.16 | 36.56 | -0.7 | |
| Total Wright | | | 51.45 | 37.47 | 13.3 | | | | 50.69 | 36.57 | 12.1 | |
| Pisgah | | | | | | | | | | | | |
| 331.00 Structures and Improvements | 2062 | 200-SC | 72.88 | 37.33 | | | 2062 | 200-SC | 72.97 | 36.43 | | |
| 332.00 Reservoirs, Dams and Waterways | 2062 | 200-SC | 41.95 | 37.52 | -44.1 | | 2062 | 200-SC | 41.80 | 36.62 | -42.5 | |
| 333.00 Water Wheels, Turbines & Generators | 2062 | 200-SC | 54.20 | 37.45 | -15.0 | | 2062 | 200-SC | 54.25 | 36.55 | -15.0 | |
| 334.00 Accessory Electric Equipment | 2062 | 200-SC | 53.96 | 37.45 | -0.3 | | 2062 | 200-SC | 53.91 | 36.55 | -0.3 | |
| 335.00 Miscellaneous Power Plant Equipment | 2062 | 200-SC | 47.01 | 37.50 | -0.6 | | 2062 | 200-SC | 47.04 | 36.59 | -0.6 | |
| Total Pisgah | | | 43.17 | 37.51 | -38.7 | | | | 43.03 | 36.61 | -37.3 | |

OTTER TAIL POWER COMPANY
Current and Updated Parameters
Vintage Group Procedure

Statement F

| Account Description A | Current Parameters | | | | | | | Updated Parameters | | | | | | |
|--|----------------------|---------------------|----------------|-------------------|-------------------|-------------------|----------------------|---------------------|----------------|-------------------|-------------------|-------------------|--|--|
| | B P-Life/ AYFR | C Curve Shape | D VG ASL | E Rem. Life | F Avg. Sal. | G Fut. Sal. | H P-Life/ AYFR | I Curve Shape | J VG ASL | K Rem. Life | L Avg. Sal. | M Fut. Sal. | | |
| Dayton Hollow | | | | | | | | | | | | | | |
| 331.00 Structures and Improvements | 2062 | 200-SC | 39.89 | 37.54 | -1.5 | | 2062 | 200-SC | 39.37 | 36.63 | -1.2 | | | |
| 332.00 Reservoirs, Dams and Waterways | 2062 | 200-SC | 44.69 | 37.51 | -5.5 | | 2062 | 200-SC | 45.22 | 36.60 | -15.9 | | | |
| 333.00 Water Wheels, Turbines & Generators | 2062 | 200-SC | 53.11 | 37.46 | -10.2 | | 2062 | 200-SC | 53.15 | 36.55 | -10.2 | | | |
| 334.00 Accessory Electric Equipment | 2062 | 200-SC | 59.71 | 37.42 | 0.1 | | 2062 | 200-SC | 59.77 | 36.52 | 0.1 | | | |
| 335.00 Miscellaneous Power Plant Equipment | 2062 | 200-SC | 47.01 | 37.50 | -0.2 | | 2062 | 200-SC | 47.04 | 36.59 | -0.2 | | | |
| Total Dayton Hollow | | | 45.79 | 37.50 | -5.1 | | | | 46.17 | 36.59 | -12.9 | | | |
| Taplin Gorge | | | | | | | | | | | | | | |
| 331.00 Structures and Improvements | 2062 | 200-SC | 108.94 | 37.06 | | | 2062 | 200-SC | 109.13 | 36.18 | | | | |
| 332.00 Reservoirs, Dams and Waterways | 2062 | 200-SC | 62.36 | 37.39 | -4.8 | | 2062 | 200-SC | 57.12 | 36.53 | -4.2 | | | |
| 333.00 Water Wheels, Turbines & Generators | 2062 | 200-SC | 113.71 | 37.03 | | | 2062 | 200-SC | 113.92 | 36.14 | | | | |
| 334.00 Accessory Electric Equipment | 2062 | 200-SC | 63.01 | 37.40 | -0.3 | | 2062 | 200-SC | 63.08 | 36.50 | -0.3 | | | |
| 335.00 Miscellaneous Power Plant Equipment | 2062 | 200-SC | 51.47 | 37.47 | 1.8 | | 2062 | 200-SC | 51.48 | 36.57 | 1.8 | | | |
| Total Taplin Gorge | | | 62.50 | 37.39 | -3.4 | | | | 58.36 | 36.52 | -2.9 | | | |
| OTHER PRODUCTION | | | | | | | | | | | | | | |
| Jamestown | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | | | 35.07 | 10.35 | -6.4 | | | | 42.68 | 16.13 | -7.0 | -6.8 | | |
| 342.00 Fuel Holders and Accessories | | | 28.47 | 10.36 | -8.1 | -6.2 | | | 35.74 | 16.14 | -8.5 | -6.8 | | |
| 343.00 Prime Movers | | | 40.87 | 10.35 | -7.5 | -6.2 | | | 45.82 | 16.13 | -8.0 | -6.8 | | |
| 345.00 Accessory Electric Equipment | | | 36.98 | 10.35 | -2.3 | -6.2 | | | 44.88 | 16.13 | -2.7 | -6.8 | | |
| 346.00 Miscellaneous Power Plant Equipment | | | 22.84 | 10.36 | 4.1 | -6.2 | | | 29.79 | 16.15 | 3.7 | -6.8 | | |
| Total Jamestown | | | 39.31 | 10.35 | -7.2 | -6.2 | | | 44.77 | 16.13 | -7.6 | -6.8 | | |
| Jamestown Unit 1 | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2033 | 200-SC | 35.89 | 10.35 | -6.4 | -6.2 | 2040 | 200-SC | 43.56 | 16.13 | -7.2 | -7.0 | | |
| 342.00 Fuel Holders and Accessories | 2033 | 200-SC | 28.31 | 10.36 | -9.3 | -6.2 | 2040 | 200-SC | 35.76 | 16.14 | -10.1 | -7.0 | | |
| 343.00 Prime Movers | 2033 | 200-SC | 38.04 | 10.35 | -8.6 | -6.2 | 2040 | 200-SC | 43.20 | 16.13 | -9.3 | -7.0 | | |
| 345.00 Accessory Electric Equipment | 2033 | 200-SC | 56.37 | 10.34 | -5.8 | -6.2 | 2040 | 200-SC | 62.42 | 16.11 | -6.6 | -7.0 | | |
| 346.00 Miscellaneous Power Plant Equipment | 2033 | 200-SC | 22.42 | 10.36 | 1.6 | -6.2 | 2040 | 200-SC | 29.32 | 16.15 | 1.0 | -7.0 | | |
| Total Jamestown Unit 1 | | | 36.62 | 10.35 | -8.2 | -6.2 | | | 42.47 | 16.13 | -8.8 | -7.0 | | |
| Jamestown Unit 2 | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2033 | 200-SC | 27.72 | 10.36 | -6.2 | -6.2 | 2040 | 200-SC | 34.62 | 16.14 | -7.0 | -7.0 | | |
| 342.00 Fuel Holders and Accessories | 2033 | 200-SC | 30.19 | 10.35 | -5.6 | -6.2 | 2040 | 200-SC | 35.50 | 16.12 | -5.7 | -7.0 | | |
| 343.00 Prime Movers | 2033 | 200-SC | 43.37 | 10.35 | -6.6 | -6.2 | 2040 | 200-SC | 48.10 | 16.13 | -7.3 | -7.0 | | |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description | Current Parameters | | | | | | | | | | Updated Parameters | | | | | | | | | | | | | | |
|---|--------------------|----------------|-----------|--------------|--------------|-----------------|----------------|-----------|--------------|--------------|--------------------|----------------|---|--------------|--------------|-----------------|----------------|-----------|--------------|--------------|--------|-------|-------|------|------|
| | A | | | | | E | | | | | G | | | | | I | | | | | K | | | | |
| | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | | | | | |
| 345.00 Accessory Electric Equipment | 2033 | 200-SC | 21.27 | 10.36 | 3.0 | -6.2 | 2040 | 200-SC | 27.99 | 16.15 | 2.5 | -7.0 | 346.00 Miscellaneous Power Plant Equipment | 2033 | 200-SC | 45.96 | 10.35 | 14.3 | -6.2 | 2040 | 200-SC | 52.32 | 16.12 | 14.2 | -7.0 |
| Total Jamestown Unit 2 | | | 42.30 | 10.35 | -6.2 | | | | 47.26 | 16.13 | -6.9 | | | | | | | 47.26 | 16.13 | -6.9 | | | | | |
| Lake Preston | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2033 | 200-SC | 27.79 | 10.36 | -7.1 | -7.1 | 2040 | 200-SC | 37.73 | 16.14 | -8.1 | -7.9 | 342.00 Fuel Holders and Accessories | 2033 | 200-SC | 39.90 | 10.35 | -6.9 | -7.1 | 2040 | 200-SC | 47.05 | 16.13 | -7.6 | -7.9 |
| 343.00 Prime Movers | 2033 | 200-SC | 43.28 | 10.35 | -7.0 | -7.1 | 2040 | 200-SC | 45.52 | 16.13 | -7.7 | -7.9 | 345.00 Accessory Electric Equipment | 2033 | 200-SC | 42.29 | 10.35 | -7.0 | -7.1 | 2040 | 200-SC | 50.11 | 16.13 | -7.7 | -7.9 |
| 346.00 Miscellaneous Power Plant Equipment | 2033 | 200-SC | 48.82 | 10.35 | 4.2 | -7.1 | 2040 | 200-SC | 55.07 | 16.12 | 3.5 | -7.9 | Total Lake Preston | | | 41.52 | 10.35 | -6.9 | -7.1 | | | 45.45 | 16.13 | -7.7 | -7.9 |
| Total Lake Preston | | | 41.52 | 10.35 | -6.9 | -7.1 | | | 45.45 | 16.13 | -7.7 | -7.9 | | | | | | | | | | | | | |
| Solway Combustion Turbine | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2038 | 200-SC | 31.26 | 15.19 | -1.6 | -1.6 | 2038 | 200-SC | 30.60 | 14.23 | -1.6 | -1.6 | 342.00 Fuel Holders and Accessories | 2038 | 200-SC | 27.04 | 15.19 | -1.6 | -1.6 | 2038 | 200-SC | 30.04 | 14.23 | -1.5 | -1.6 |
| 343.00 Prime Movers | 2038 | 200-SC | 29.98 | 15.19 | -1.8 | -1.6 | 2038 | 200-SC | 28.37 | 14.23 | -1.7 | -1.6 | 345.00 Accessory Electric Equipment | 2038 | 200-SC | 32.37 | 15.19 | -1.6 | -1.6 | 2038 | 200-SC | 32.38 | 14.22 | -1.5 | -1.6 |
| 346.00 Miscellaneous Power Plant Equipment | 2038 | 200-SC | 29.77 | 15.19 | -1.6 | -1.6 | 2038 | 200-SC | 29.79 | 14.23 | -1.5 | -1.6 | Total Solway Combustion Turbine | | | 30.16 | 15.19 | -1.8 | -1.6 | | | 28.95 | 14.23 | -1.7 | -1.6 |
| Total Solway Combustion Turbine | | | 30.16 | 15.19 | -1.8 | -1.6 | | | 28.95 | 14.23 | -1.7 | -1.6 | | | | | | | | | | | | | |
| Astoria Station Combustion Turbine | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2056 | 200-SC | 33.47 | 32.09 | -2.2 | -2.2 | 2056 | 200-SC | 33.45 | 31.17 | -2.2 | -2.2 | 342.00 Fuel Holders and Accessories | 2056 | 200-SC | 33.47 | 32.09 | -2.2 | -2.2 | 2056 | 200-SC | 33.48 | 31.17 | -2.2 | -2.2 |
| 343.00 Prime Movers | 2056 | 200-SC | 33.47 | 32.09 | -2.2 | -2.2 | 2056 | 200-SC | 33.48 | 31.17 | -2.2 | -2.2 | 345.00 Accessory Electric Equipment | 2056 | 200-SC | 33.47 | 32.09 | -2.2 | -2.2 | 2056 | 200-SC | 33.48 | 31.17 | -2.2 | -2.2 |
| 346.00 Miscellaneous Power Plant Equipment | 2056 | 200-SC | 33.47 | 32.09 | -2.2 | -2.2 | 2056 | 200-SC | 33.48 | 31.17 | -2.2 | -2.2 | Total Astoria Station Combustion Turbine | | | 33.47 | 32.09 | -2.2 | -2.2 | | | 33.48 | 31.17 | -2.2 | -2.2 |
| Total Astoria Station Combustion Turbine | | | 33.47 | 32.09 | -2.2 | -2.2 | | | 33.47 | 31.17 | -2.2 | -2.2 | | | | | | | | | | | | | |
| WIND PRODUCTION | | | | | | | | | | | | | | | | | | | | | | | | | |
| Ashtabula | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2043 | 200-SC | 33.73 | 19.96 | -6.3 | -6.3 | 2043 | 200-SC | 33.77 | 19.01 | -6.4 | -6.4 | 344.00 Generators | 2043 | 200-SC | 33.11 | 19.96 | -6.2 | -6.3 | 2043 | 200-SC | 33.09 | 19.01 | -6.2 | -6.4 |
| 345.00 Accessory Electric Equipment | 2043 | 200-SC | 33.41 | 19.96 | -6.3 | -6.3 | 2043 | 200-SC | 33.45 | 19.01 | -6.4 | -6.4 | 346.00 Miscellaneous Power Plant Equipment | 2043 | 200-SC | 22.48 | 19.97 | -5.0 | -6.3 | 2043 | 200-SC | 22.48 | 19.02 | -5.0 | -6.4 |
| Total Ashtabula | | | 33.13 | 19.96 | -6.2 | -6.3 | | | 33.11 | 19.01 | -6.2 | -6.4 | Total Ashtabula | | | 33.13 | 19.96 | -6.2 | -6.3 | | | 33.11 | 19.01 | -6.2 | -6.4 |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description | Current Parameters | | | | | | | | | | Updated Parameters | | | | | | | | | | | | | | |
|--|--------------------|----------------|-----------|--------------|--------------|--------------|-----------------|----------------|-----------|--------------|--------------------|--------------|-----------------|----------------|-----------|--------------|--------------|--------------|-----------------|----------------|-----------|--------------|--------------|--------------|-------|
| | A | B | C | D | E | F | G | H | I | J | K | L | M | N | O | P | Q | R | S | T | | | | | |
| | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | P-Life/ AYFR | Curve Shape | VG ASL | Rem. Life | Avg. Sal. | Fut. Sal. | |
| Ashtabula III | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2048 | 200-SC | 36.39 | 24.66 | -12.5 | -12.5 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | |
| 344.00 Generators | 2048 | 200-SC | 36.39 | 24.66 | -12.5 | -12.5 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | -12.2 |
| 345.00 Accessory Electric Equipment | 2048 | 200-SC | 36.39 | 24.66 | -12.5 | -12.5 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | -12.2 |
| 346.00 Miscellaneous Power Plant Equipment | 2048 | 200-SC | 36.39 | 24.66 | -12.5 | -12.5 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | 2048 | 200-SC | 24.22 | 23.75 | -12.2 | -12.2 | -12.2 |
| Total Ashtabula III | | | 36.39 | 24.66 | -12.5 | -12.5 | | | 24.22 | 23.75 | -12.2 | -12.2 | | | 24.22 | 23.75 | -12.2 | -12.2 | | | 24.22 | 23.75 | -12.2 | -12.2 | |
| Langdon | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2042 | 200-SC | 33.77 | 19.01 | -7.6 | -7.6 | 2042 | 200-SC | 33.81 | 18.05 | -7.6 | -7.6 | 2042 | 200-SC | 33.81 | 18.05 | -7.6 | -7.6 | 2042 | 200-SC | 33.81 | 18.05 | -7.6 | -7.6 | |
| 344.00 Generators | 2042 | 200-SC | 33.02 | 19.01 | -7.5 | -7.6 | 2042 | 200-SC | 33.02 | 18.05 | -7.4 | -7.6 | 2042 | 200-SC | 33.02 | 18.05 | -7.4 | -7.6 | 2042 | 200-SC | 33.02 | 18.05 | -7.4 | -7.6 | -7.6 |
| 345.00 Accessory Electric Equipment | 2042 | 200-SC | 33.32 | 19.01 | -7.6 | -7.6 | 2042 | 200-SC | 30.65 | 18.06 | -7.6 | -7.6 | 2042 | 200-SC | 30.65 | 18.06 | -7.6 | -7.6 | 2042 | 200-SC | 30.65 | 18.06 | -7.6 | -7.6 | -7.6 |
| 346.00 Miscellaneous Power Plant Equipment | 2042 | 200-SC | 22.45 | 19.02 | -5.4 | -7.6 | 2042 | 200-SC | 22.46 | 18.07 | -5.4 | -7.6 | 2042 | 200-SC | 22.46 | 18.07 | -5.4 | -7.6 | 2042 | 200-SC | 22.46 | 18.07 | -5.4 | -7.6 | -7.6 |
| Total Langdon | | | 33.05 | 19.01 | -7.5 | -7.6 | | | 32.76 | 18.05 | -7.5 | -7.6 | | | 32.76 | 18.05 | -7.5 | -7.6 | | | 32.76 | 18.05 | -7.5 | -7.6 | |
| Luverne | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2044 | 200-SC | 33.70 | 20.90 | -10.2 | -10.2 | 2044 | 200-SC | 33.73 | 19.96 | -10.5 | -10.5 | 2044 | 200-SC | 33.73 | 19.96 | -10.5 | -10.5 | 2044 | 200-SC | 33.73 | 19.96 | -10.5 | -10.5 | |
| 344.00 Generators | 2044 | 200-SC | 32.54 | 20.90 | -10.8 | -10.2 | 2044 | 200-SC | 32.59 | 19.96 | -11.4 | -10.5 | 2044 | 200-SC | 32.59 | 19.96 | -11.4 | -10.5 | 2044 | 200-SC | 32.59 | 19.96 | -11.4 | -10.5 | -10.5 |
| 345.00 Accessory Electric Equipment | 2044 | 200-SC | 33.69 | 20.90 | -10.2 | -10.2 | 2044 | 200-SC | 33.72 | 19.96 | -10.5 | -10.5 | 2044 | 200-SC | 33.72 | 19.96 | -10.5 | -10.5 | 2044 | 200-SC | 33.72 | 19.96 | -10.5 | -10.5 | |
| 346.00 Miscellaneous Power Plant Equipment | 2044 | 200-SC | 24.28 | 20.92 | -7.9 | -10.2 | 2044 | 200-SC | 24.29 | 19.97 | -8.1 | -10.5 | 2044 | 200-SC | 24.29 | 19.97 | -8.1 | -10.5 | 2044 | 200-SC | 24.29 | 19.97 | -8.1 | -10.5 | |
| Total Luverne | | | 32.62 | 20.90 | -10.7 | -10.2 | | | 32.67 | 19.96 | -11.3 | -10.5 | | | 32.67 | 19.96 | -11.3 | -10.5 | | | 32.67 | 19.96 | -11.3 | -10.5 | |
| Merricourt | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2055 | 200-SC | 33.48 | 31.17 | -8.5 | -8.5 | 2055 | 200-SC | 33.43 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.43 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.43 | 30.25 | -8.4 | -8.4 | |
| 344.00 Generators | 2055 | 200-SC | 33.48 | 31.17 | -8.5 | -8.5 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | |
| 345.00 Accessory Electric Equipment | 2055 | 200-SC | 33.48 | 31.17 | -8.5 | -8.5 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | 2055 | 200-SC | 33.48 | 30.25 | -8.4 | -8.4 | |
| 346.00 Miscellaneous Power Plant Equipment | 2055 | 200-SC | 31.64 | 31.18 | -8.5 | -8.5 | 2055 | 200-SC | 30.89 | 30.26 | -8.4 | -8.4 | 2055 | 200-SC | 30.89 | 30.26 | -8.4 | -8.4 | 2055 | 200-SC | 30.89 | 30.26 | -8.4 | -8.4 | |
| Total Merricourt | | | 33.48 | 31.17 | -8.5 | -8.5 | | | 33.48 | 30.25 | -8.4 | -8.4 | | | 33.48 | 30.25 | -8.4 | -8.4 | | | 33.48 | 30.25 | -8.4 | -8.4 | |
| SOLAR PRODUCTION | | | | | | | | | | | | | | | | | | | | | | | | | |
| Jamestown | | | | | | | | | | | | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2045 | 200-SC | 24.23 | 21.86 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | |
| 345.00 Accessory Electric Equipment | 2045 | 200-SC | 24.23 | 21.86 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | -1.0 |
| Total Jamestown | | | 24.23 | 21.86 | -1.0 | -1.0 | | | 24.23 | 20.92 | -1.0 | -1.0 | | | 24.23 | 20.92 | -1.0 | -1.0 | | | 24.23 | 20.92 | -1.0 | -1.0 | |

Statement F

OTTER TAIL POWER COMPANY

Current and Updated Parameters
Vintage Group Procedure

| Account Description A | Current Parameters | | | | | | | Updated Parameters | | | | | | |
|--|----------------------|---------------------|----------------|-------------------|-------------------|-------------------|----------------------|---------------------|----------------|-------------------|-------------------|-------------------|--|--|
| | B P-Life/ AYFR | C Curve Shape | D VG ASL | E Rem. Life | F Avg. Sal. | G Fut. Sal. | H P-Life/ AYFR | I Curve Shape | J VG ASL | K Rem. Life | L Avg. Sal. | M Fut. Sal. | | |
| Hoot Lake | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2045 | 200-SC | 35.00 | 35.00 | -12.1 | -12.1 | 2058 | 200-SC | 33.47 | 33.01 | -12.7 | -12.7 | | |
| 345.00 Accessory Electric Equipment | 2045 | 200-SC | 35.00 | 35.00 | -12.1 | -12.1 | 2058 | 200-SC | 33.47 | 33.01 | -12.7 | -12.7 | | |
| 346.00 Miscellaneous Power Plant Equipment | 2045 | 200-SC | 35.00 | 35.00 | -12.1 | -12.1 | 2058 | 200-SC | 33.47 | 33.01 | -12.7 | -12.7 | | |
| Total Hoot Lake | | | 35.00 | 35.00 | -12.1 | -12.1 | | | 33.47 | 33.01 | -12.7 | -12.7 | | |
| Rush Lake | | | | | | | | | | | | | | |
| 341.00 Structures and Improvements | 2045 | 200-SC | 24.23 | 21.86 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | | |
| 345.00 Accessory Electric Equipment | 2045 | 200-SC | 24.23 | 21.86 | -1.0 | -1.0 | 2045 | 200-SC | 24.23 | 20.92 | -1.0 | -1.0 | | |
| Total Rush Lake | | | 24.23 | 21.86 | -1.0 | -1.0 | | | 24.23 | 20.92 | -1.0 | -1.0 | | |

Statement G

OTTER TAIL POWER COMPANY

Plant Activity for 2023

| Account Description A | Beginning Balance B | Additions C | Retirements D | Adjustments E | Transfers F | Ending Balance G |
|---|---------------------------|-----------------------|----------------------|-------------------------|---------------------|------------------------|
| INTANGIBLE PLANT | | | | | | |
| 303.91 Software - 5 Yr. | \$ 4,292,241 | \$ 2,210,049 | \$ - | \$ - | \$ - | \$ 6,502,290 |
| 303.92 Software - 10 Yr. | 25,706,359 | 4,205,087 | - | - | - | 29,911,445 |
| Intangible Plant | \$ 29,998,600 | \$ 6,415,136 | \$ - | \$ - | \$ - | \$ 36,413,736 |
| STEAM PRODUCTION | | | | | | |
| 311.00 Structures and Improvements | \$ 121,556,590 | \$ 348,104 | \$ 5,667,110 | \$ - | \$ (475,049) | \$ 115,762,534 |
| 312.00 Boiler Plant Equipment | 345,075,795 | 2,235,163 | 38,453,191 | - | (20,117) | 308,837,649 |
| 312.10 Boiler Plant Equipment - Landfill | 10,412,772 | 787,271 | - | - | - | 11,200,043 |
| 314.00 Turbo Generator Units | 66,597,673 | 3,118,484 | 11,688,760 | - | (8,367) | 58,019,030 |
| 315.00 Accessory Electric Equipment | 35,977,574 | 56,444 | 2,518,844 | - | (264,030) | 33,251,144 |
| 316.00 Misc. Power Plant Equipment | 7,104,411 | 147,882 | 915,345 | - | (294,696) | 6,042,253 |
| Total Steam Production | \$ 586,724,815 | \$ 6,693,348 | \$ 59,243,250 | \$ (\$1,062,259) | \$ 744,126 | \$ 533,112,654 |
| HYDRAULIC PRODUCTION | | | | | | |
| 331.00 Structures and Improvements | \$ 486,737 | \$ 889,101 | \$ 333 | \$ - | \$ 496,332 | \$ 1,871,837 |
| 332.00 Reservoirs, Dams and Waterways | 7,605,920 | (234,752) | 171,451 | - | 11,247 | 7,210,964 |
| 333.00 Water Wheels, Turbines and Gen. | 1,373,867 | - | - | - | - | 1,373,867 |
| 334.00 Accessory Electric Equipment | 1,094,885 | 683,869 | - | - | - | 1,778,754 |
| 335.00 Misc. Power Plant Equipment | 435,026 | - | - | - | 236,547 | 671,573 |
| Total Hydraulic Production | \$ 10,996,435 | \$ 1,338,218 | \$ 171,784 | \$ - | \$ 744,126 | \$ 12,906,996 |
| OTHER PRODUCTION | | | | | | |
| 341.00 Structures and Improvements | \$ 46,363,517 | \$ 6,383,801 | \$ 20,956 | \$ - | \$ 71,562 | \$ 52,797,924 |
| 342.00 Fuel Holders and Accessories | 7,911,580 | (148,785) | - | - | - | 7,762,795 |
| 343.00 Prime Movers | 138,706,970 | 1,973,584 | 92,115 | - | - | 140,588,440 |
| 344.00 Generators | 481,779,582 | 69,040,988 | 4,306,916 | - | 1,255,924 | 547,769,577 |
| 345.00 Accessory Electric Equipment | 46,611,436 | 64,788,199 | - | - | 124,808 | 111,524,443 |
| 346.00 Misc. Power Plant Equipment | 2,287,591 | 881,358 | 284 | - | 3,955 | 3,172,620 |
| Total Other Production | \$ 723,660,677 | \$ 142,919,144 | \$ 4,420,271 | \$ - | \$ 1,456,249 | \$ 863,615,798 |
| TRANSMISSION PLANT | | | | | | |
| 353.00 Station Equipment | \$ 182,616,669 | \$ 6,700,305 | \$ 12,756 | \$ - | \$ 248,206 | \$ 189,552,423 |
| 354.00 Towers and Fixtures | 197,014,928 | 35,672 | - | - | - | 197,050,600 |
| 355.00 Poles and Fixtures | 168,586,947 | 8,374,276 | 2,829,032 | - | - | 174,132,190 |
| 356.00 Overhead Conductors and Devices | 185,138,423 | 9,488,717 | 1,469,477 | - | - | 193,157,663 |
| 358.00 Underground Conductors and Devices | 103,561 | (26,101) | - | - | - | 77,461 |
| Total Transmission Plant | \$ 733,460,528 | \$ 24,572,868 | \$ 4,311,265 | \$ - | \$ 248,206 | \$ 753,970,337 |

OTTER TAIL POWER COMPANY
Plant Activity for 2023

Statement G

| Account Description A | Beginning Balance B | Additions C | Retirements D | Adjustments E | Transfers F | Ending Balance G |
|--|---------------------------|-----------------------|----------------------|------------------|---------------------|-------------------------|
| DISTRIBUTION PLANT | | | | | | |
| 362.00 Station Equipment | \$ 95,079,235 | \$ 5,852,853 | \$ 396,867 | \$ - | \$ (27,331) | \$ 100,507,890 |
| 364.00 Poles, Towers and Fixtures | 86,786,802 | 3,737,614 | 314,282 | | | 90,210,134 |
| 365.00 Overhead Conductors and Devices | 60,876,491 | 2,905,055 | 416,494 | | | 63,365,052 |
| 367.00 Underground Conductors and Devices | 114,686,120 | 20,712,444 | 1,320,214 | | | 134,078,350 |
| 368.00 Line Transformers | 129,349,816 | 7,577,252 | 1,347,354 | | 27,331 | 135,607,045 |
| 369.00 Overhead Services | 14,096,890 | 217,175 | 9,949 | | | 14,304,116 |
| 369.10 Underground Services | 49,935,220 | 2,087,695 | 29,827 | | | 51,993,089 |
| 370.00 Meters | 28,155,291 | 213,555 | | | | 28,368,846 |
| 370.05 Smart Meters | 921,313 | | | | | 921,313 |
| 370.10 Load Management Switches | 8,899,439 | | | | | 8,899,439 |
| 370.20 Interruption Monitors* | | | | | | 26,200 |
| 371.10 Electric Vehicle Charging Station | 9,628,628 | 652,973 | 95,763 | | | 10,185,838 |
| 371.20 Other Private Lighting | | | 633,027 | | | 14,586,957 |
| 373.00 Street Lighting and Signal Systems | 13,235,268 | 1,984,716 | | | | |
| Total Distribution Plant | \$ 611,676,713 | \$ 45,941,332 | \$ 4,563,775 | \$ - | \$ - | \$ 653,054,269 |
| GENERAL PLANT | | | | | | |
| 390.00 Structures and Improvements | \$ 23,703,186 | \$ 2,513,026 | \$ 103,865 | \$ - | \$ (4,047) | \$ 26,108,301 |
| 390.10 General Office Buildings | 6,426,445 | 34,366 | 9,326 | | | 6,451,486 |
| 390.20 Fleet Service Center Buildings | 746,920 | 149,960 | | | | 896,880 |
| 390.25 Fleet Service Center Buildings | 2,154,593 | | | | | 2,154,593 |
| 390.30 Central Stores Building | 4,276,593 | 217,690 | 163,778 | | (73,302) | 4,494,284 |
| 391.00 Office Furniture* | 597,122 | 37,665 | | | | 471,009 |
| 391.10 Office Equipment* | 233,890 | 25,460 | | | | 186,048 |
| 391.20 Duplicating Equipment* | 416,979 | 418,728 | | | | 835,707 |
| 391.50 Computer Systems* | 3,412,877 | 1,126,636 | 138,307 | (1,058,219) | | 3,342,987 |
| 391.60 Computer Related Equipment* | 2,998,086 | 410,144 | | 1,131,522 | | 4,539,752 |
| 394.00 Tools, Shop and Garage Equipment* | 5,452,464 | 933,936 | 977,200 | | 42,652 | 5,451,853 |
| 394.20 Automated Meter Reading Equipment* | 401,984 | | | | | 401,984 |
| 396.00 Power Operated Equipment | 1,701,526 | 16,352 | | | 31,322 | 1,749,199 |
| 397.00 Communication Equipment* | 4,613,872 | 255,903 | | | | 4,869,774 |
| 397.10 Radio Telecommunications Equipment* | 463,544 | 471 | | | | 464,016 |
| 397.20 Microwave Equipment* | 3,749,912 | 170,452 | | | | 3,920,364 |
| 397.30 Radio Load Control Equipment* | 165,980 | | | | | 165,980 |
| 397.40 Communication Equipment - Towers | 1,922,046 | | | | | 1,922,046 |
| Total General Plant | \$ 63,438,020 | \$ 6,310,790 | \$ 1,392,475 | \$ - | \$ 69,927 | \$ 68,426,263 |
| TOTAL DEPRECIABLE PLANT | \$ 2,759,955,788 | \$ 234,190,836 | \$ 74,102,821 | \$ - | \$ 1,456,249 | \$ 2,921,500,052 |

OTTER TAIL POWER COMPANY
Analysis of Depreciation Reserve for 2023

Statement H

| Account Description A | Beginning Balance B | Credits C | | Debits D | | Retirements E | Cost of Removal F | Other Credits (Debits) G | Ending Balance H |
|---|---------------------------|----------------------|-----------------------|----------------------|---------------------|-----------------------|-------------------------|--------------------------------|------------------------|
| | | Accruals C | Gross Salvage D | Salvage D | Removal F | | | | |
| INTANGIBLE PLANT | | | | | | | | | |
| 303.91 Software - 5 Yr. | \$ 2,643,014 | \$ 971,220 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 3,614,234 |
| 303.92 Software - 10 Yr. | 8,541,550 | 2,884,533 | - | - | - | - | - | - | 11,426,083 |
| Intangible Plant | \$ 11,184,564 | \$ 3,855,753 | \$ - | \$ - | \$ - | \$ - | \$ - | \$ - | \$ 15,040,317 |
| STEAM PRODUCTION | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 68,906,774 | \$ 2,826,304 | \$ 633 | \$ 5,667,110 | \$ 38,379 | \$ (1,627,252) | \$ | \$ | \$ 64,400,970 |
| 312.00 Boiler Plant Equipment | 167,497,251 | 9,597,174 | 66,516 | 38,453,191 | 3,466,340 | (4,088,028) | | | 131,153,381 |
| 312.10 Boiler Plant Equipment - Landfill | 4,037,607 | 232,757 | | | | 2,846,537 | | | 7,116,900 |
| 314.00 Turbo Generator Units | 49,266,547 | 1,195,396 | 27 | 11,688,760 | 20,634 | (2,192,983) | | | 36,559,592 |
| 315.00 Accessory Electric Equipment | 22,791,481 | 748,557 | | 2,518,844 | | (786,931) | | | 20,234,262 |
| 316.00 Misc. Power Plant Equipment | 3,976,654 | 183,111 | 60,077 | 915,345 | 5,136,621 | 4,585,631 | | | 2,753,507 |
| Total Steam Production | \$ 316,476,314 | \$ 14,783,298 | \$ 127,252 | \$ 59,243,250 | \$ 8,661,975 | \$ (1,283,026) | \$ | \$ | \$ 262,218,613 |
| HYDRAULIC PRODUCTION | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 331,498 | \$ 4,301 | \$ - | \$ 333 | \$ 2,135 | \$ 586,909 | \$ | \$ | \$ 920,240 |
| 332.00 Reservoirs, Dams and Waterways | 3,292,540 | 113,190 | | 171,451 | 234,906 | 13,373 | | | 3,012,745 |
| 333.00 Water Wheels, Turbines and Gen. | 1,337,517 | 973 | | | | | | | 1,338,490 |
| 334.00 Accessory Electric Equipment | 587,578 | 23,257 | | | | | | | 610,835 |
| 335.00 Misc. Power Plant Equipment | 402,577 | 868 | | | | 281,254 | | | 684,700 |
| Total Hydraulic Production | \$ 5,951,710 | \$ 142,589 | \$ - | \$ 171,784 | \$ 237,041 | \$ 881,536 | \$ | \$ | \$ 6,567,011 |
| OTHER PRODUCTION | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 9,087,316 | \$ 1,467,375 | \$ 1,404,714 | \$ 20,956 | \$ 2,469 | \$ - | \$ | \$ | \$ 11,915,979 |
| 342.00 Fuel Holders and Accessories | 1,445,964 | 243,934 | | | | | | | 1,689,898 |
| 343.00 Prime Movers | 23,113,993 | 4,253,737 | 7,500 | 92,115 | 8,000 | | | | 27,275,115 |
| 344.00 Generators | 140,087,529 | 15,947,802 | 24,826,927 | 4,306,916 | 790,393 | | | | 175,764,948 |
| 345.00 Accessory Electric Equipment | 12,868,401 | 1,986,111 | 2,465,416 | | | | | | 17,319,928 |
| 346.00 Misc. Power Plant Equipment | 294,705 | 85,742 | 57,335 | 284 | 31 | | | | 437,467 |
| Total Other Production | \$ 186,877,907 | \$ 23,984,700 | \$ 28,761,892 | \$ 4,420,271 | \$ 800,893 | \$ | \$ | \$ | \$ 234,403,335 |
| TRANSMISSION PLANT | | | | | | | | | |
| 353.00 Station Equipment | \$ 32,135,181 | \$ 2,904,102 | \$ 192 | \$ 12,756 | \$ 2,806 | \$ 295,117 | \$ | \$ | \$ 35,319,030 |
| 354.00 Towers and Fixtures | 19,238,248 | 2,856,941 | 1,908 | | 876,854 | | | | 22,097,097 |
| 355.00 Poles and Fixtures | 62,117,111 | 3,202,633 | 131,795 | 2,829,032 | 496,527 | | | | 61,745,653 |
| 356.00 Overhead Conductors and Devices | 51,512,410 | 3,092,031 | 41,342 | 1,469,477 | | | | | 52,679,780 |
| 358.00 Underground Conductors and Devices | 77,873 | 1,176 | | | | | | | 79,048 |
| Total Transmission Plant | \$ 165,080,824 | \$ 12,056,883 | \$ 175,236 | \$ 4,311,265 | \$ 1,376,187 | \$ 295,117 | \$ | \$ | \$ 171,920,608 |

OTTER TAIL POWER COMPANY
Analysis of Depreciation Reserve for 2023

Statement H

| Account Description A | Beginning Balance B | Credits C | | Debits E | | Cost of Removal F | Other Credits (Debits) G | Ending Balance H |
|--|------------------------|----------------------|----------------------|----------------------|----------------------|----------------------|-----------------------------|-----------------------|
| | | Accruals C | Gross Salvage D | Retirements E | Removal F | | | |
| DISTRIBUTION PLANT | | | | | | | | |
| 362.00 Station Equipment | \$ 26,707,725 | \$ 1,888,659 | \$ 72,342 | \$ 396,867 | \$ 33,916 | \$ | \$ 133 | \$ 28,238,076 |
| 364.00 Poles, Towers and Fixtures | 51,468,242 | 2,574,662 | 157,810 | 314,282 | 839,286 | | | 53,047,146 |
| 365.00 Overhead Conductors and Devices | 45,527,170 | 1,425,453 | 81,270 | 416,494 | 417,719 | | | 46,199,680 |
| 367.00 Underground Conductors and Devices | 45,055,978 | 2,668,578 | 178,624 | 1,320,214 | 289,285 | | | 46,293,681 |
| 368.00 Line Transformers | 22,201,903 | 2,268,074 | 1,049,342 | 1,347,354 | 887,095 | | (133) | 23,284,738 |
| 369.00 Overhead Services | 18,687,143 | 820,761 | | 9,949 | 104,549 | | | 19,393,408 |
| 369.10 Underground Services | 23,338,730 | 1,136,241 | 50 | 29,827 | 20,800 | | | 24,424,395 |
| 370.00 Meters | 10,927,601 | 903,004 | | | | | | 11,830,605 |
| 370.05 Smart Meters | 176,585 | 44,944 | | | | | | 221,530 |
| 370.10 Load Management Switches | 8,850,435 | 34,512 | | | | | | 8,884,947 |
| 370.20 Interruption Monitors* | | | | | | | | |
| 371.10 Electric Vehicle Charging Station | 7,860 | 2,620 | | | | | | 10,480 |
| 371.20 Other Private Lighting | 502,120 | 383,353 | 16,404 | 95,763 | 58,032 | | | 748,082 |
| 373.00 Street Lighting and Signal Systems | 1,820,653 | 674,952 | 44,733 | 633,027 | 219,135 | | | 1,688,176 |
| Total Distribution Plant | \$ 255,272,147 | \$ 14,825,813 | \$ 1,600,576 | \$ 4,563,775 | \$ 2,869,818 | \$ | \$ - | \$ 264,264,943 |
| GENERAL PLANT | | | | | | | | |
| 390.00 Structures and Improvements | \$ 7,814,233 | \$ 477,307 | \$ 183,565 | \$ 103,865 | \$ 5,278 | \$ | \$ (1,582) | \$ 8,364,380 |
| 390.10 General Office Buildings | 2,626,365 | 60,727 | | 9,326 | | | | 2,677,766 |
| 390.20 Fleet Service Center Buildings | 439,647 | (5,712) | | | | | | 433,935 |
| 390.25 Fleet Service Center Buildings | 89,692 | 20,461 | | | | | | 110,152 |
| 390.30 Central Stores Building | 1,530,417 | (22,887) | | | | | | 1,507,531 |
| 391.00 Office Furniture* | 459,997 | 39,344 | | 163,778 | | | | 335,563 |
| 391.10 Office Equipment* | 143,137 | 24,700 | | | | | (72,758) | 95,080 |
| 391.20 Duplicating Equipment* | 138,726 | 58,617 | | | | | | 197,343 |
| 391.50 Computer Systems* | 1,752,312 | 671,258 | | 138,307 | | | (1,032,212) | 1,253,050 |
| 391.60 Computer Related Equipment* | 1,735,330 | 620,577 | | | | | 1,104,970 | 3,460,876 |
| 394.00 Tools, Shop and Garage Equipment* | 2,897,323 | 387,057 | | 977,200 | | | 50,714 | 2,357,893 |
| 394.20 Automated Meter Reading Equipment* | 119,940 | 26,799 | | | | | | 146,739 |
| 396.00 Power Operated Equipment | 312,391 | 66,655 | | | | | 37,241 | 416,287 |
| 397.00 Communication Equipment* | 1,418,885 | 308,128 | | | | | | 1,727,013 |
| 397.10 Radio Telecommunications Equipment* | 261,160 | 46,398 | | | | | | 307,558 |
| 397.20 Microwave Equipment* | 1,999,209 | 249,995 | | | | | | 2,249,204 |
| 397.30 Radio Load Control Equipment* | 86,872 | 16,598 | | | | | | 103,470 |
| 397.40 Communication Equipment - Towers | 1,061,952 | 32,152 | | | | | | 1,094,104 |
| Total General Plant | \$ 24,887,587 | \$ 3,078,173 | \$ 183,565 | \$ 1,392,475 | \$ 5,278 | \$ | \$ 86,374 | \$ 26,837,946 |
| TOTAL DEPRECIABLE PLANT | \$ 965,731,053 | \$ 72,727,209 | \$ 30,848,521 | \$ 74,102,821 | \$ 13,951,191 | \$ | \$ 0 | \$ 981,252,771 |

Statement I

OTTER TAIL POWER COMPANY
Summary of Annual Depreciation Accruals for 2023

| Account Description | A | B | C | D=B*C | E | F=B-D-E | G | H | I=F/H | J=I/B |
|---|-------------------------|---------------------------------|------------------|--------------------------------|----------------|------------------------|-----------------------|----------------|--------------|-------|
| | Beginning Plant Balance | Est. Future Net Salvage Percent | Amount | Beginning Depreciation Reserve | Net Balance | Projection Life (Yrs.) | Remaining Life (Yrs.) | Annual Accrual | Accrual Rate | |
| INTANGIBLE PLANT | | | | | | | | | | |
| 303.91 Software - 5 Yr. | \$ 4,292,241 | \$ - | \$ - | \$ 2,643,014 | \$ 1,649,227 | 5.00 | 1.85 | \$ 891,474 | 20.77% | |
| 303.92 Software - 10 Yr. | \$ 29,998,600 | \$ - | \$ - | \$ 11,184,564 | \$ 17,164,809 | 10.00 | 6.93 | \$ 2,476,884 | 9.64% | |
| Intangible Plant | | | | | \$ 18,814,036 | | 5.59 | \$ 3,368,359 | 11.23% | |
| STEAM PRODUCTION | | | | | | | | | | |
| 311.00 Structures and Improvements | \$ 121,556,590 | -6.6% | \$ (8,022,735) | \$ 68,906,774 | \$ 60,672,550 | | 21.68 | \$ 2,798,549 | 2.30% | |
| 312.00 Boiler Plant Equipment | \$ 345,075,795 | -6.8% | \$ (23,465,154) | \$ 167,497,251 | \$ 201,043,698 | | 21.33 | \$ 9,425,396 | 2.73% | |
| 312.10 Boiler Plant Equipment - Landfill | \$ 10,412,772 | | \$ - | \$ 4,037,607 | \$ 6,375,165 | | 27.46 | \$ 232,162 | 2.23% | |
| 314.00 Turbo Generator Units | \$ 66,597,673 | -7.0% | \$ (4,661,837) | \$ 49,266,547 | \$ 21,992,963 | | 20.58 | \$ 1,068,657 | 1.60% | |
| 315.00 Accessory Electric Equipment | \$ 35,977,574 | -6.8% | \$ (2,446,475) | \$ 22,791,481 | \$ 15,632,569 | | 21.30 | \$ 733,923 | 2.04% | |
| 316.00 Misc. Power Plant Equipment | \$ 7,104,411 | -6.9% | \$ (490,204) | \$ 3,976,654 | \$ 3,617,961 | | 20.58 | \$ 175,800 | 2.47% | |
| Total Steam Production | \$ 586,724,815 | -6.7% | \$ (39,086,406) | \$ 316,476,314 | \$ 309,334,906 | | 21.43 | \$ 14,434,488 | 2.46% | |
| HYDRAULIC PRODUCTION | | | | | | | | | | |
| 331.00 Structures and Improvements | \$ 486,737 | \$ - | \$ - | \$ 331,498 | \$ 155,240 | | 37.44 | \$ 4,146 | 0.85% | |
| 332.00 Reservoirs, Dams and Waterways | \$ 7,605,920 | | \$ - | \$ 3,292,540 | \$ 4,313,380 | | 37.50 | \$ 115,023 | 1.51% | |
| 333.00 Water Wheels, Turbines and Gen. | \$ 1,373,867 | | \$ - | \$ 1,337,517 | \$ 36,350 | | 37.46 | \$ 970 | 0.07% | |
| 334.00 Accessory Electric Equipment | \$ 1,094,885 | | \$ - | \$ 587,578 | \$ 507,307 | | 37.50 | \$ 13,528 | 1.24% | |
| 335.00 Misc. Power Plant Equipment | \$ 435,026 | | \$ - | \$ 402,577 | \$ 32,449 | | 37.48 | \$ 866 | 0.20% | |
| Total Hydraulic Production | \$ 10,996,435 | | \$ - | \$ 5,951,710 | \$ 5,044,725 | | 37.50 | \$ 134,534 | 1.22% | |
| OTHER PRODUCTION | | | | | | | | | | |
| 341.00 Structures and Improvements | \$ 46,363,517 | -2.2% | \$ (1,019,997) | \$ 9,067,316 | \$ 38,316,199 | | 28.81 | \$ 1,329,962 | 2.87% | |
| 342.00 Fuel Holders and Accessories | \$ 7,911,580 | -2.5% | \$ (197,790) | \$ 1,445,964 | \$ 6,663,406 | | 26.86 | \$ 248,079 | 3.14% | |
| 343.00 Prime Movers | \$ 138,706,970 | -2.4% | \$ (3,328,967) | \$ 23,113,993 | \$ 118,921,944 | | 27.99 | \$ 4,248,730 | 3.06% | |
| 344.00 Generators | \$ 481,779,582 | | \$ - | \$ 140,087,529 | \$ 341,692,053 | | | | | |
| 345.00 Accessory Electric Equipment | \$ 46,611,436 | -2.4% | \$ (1,118,674) | \$ 12,868,401 | \$ 34,861,710 | | 28.39 | \$ 1,227,957 | 2.63% | |
| 346.00 Misc. Power Plant Equipment | \$ 2,287,591 | -2.3% | \$ (52,615) | \$ 294,705 | \$ 2,045,501 | | 27.44 | \$ 74,544 | 3.26% | |
| Total Other Production | \$ 723,660,677 | -0.8% | \$ (5,718,043) | \$ 186,877,907 | \$ 542,500,813 | | 76.09 | \$ 7,129,272 | 0.99% | |
| TRANSMISSION PLANT | | | | | | | | | | |
| 353.00 Station Equipment | \$ 182,616,669 | -5.0% | \$ (9,130,833) | \$ 32,135,181 | \$ 159,612,321 | 65.00 | 56.05 | \$ 2,847,677 | 1.56% | |
| 354.00 Towers and Fixtures | \$ 197,014,928 | -10.0% | \$ (19,701,493) | \$ 19,238,248 | \$ 197,478,173 | 80.00 | 73.24 | \$ 2,696,316 | 1.37% | |
| 355.00 Poles and Fixtures | \$ 168,586,947 | -50.0% | \$ (84,293,473) | \$ 62,117,111 | \$ 190,763,309 | 80.00 | 65.47 | \$ 2,913,751 | 1.73% | |
| 356.00 Overhead Conductors and Devices | \$ 185,138,423 | -30.0% | \$ (55,541,527) | \$ 51,512,410 | \$ 189,167,540 | 80.00 | 67.29 | \$ 2,811,228 | 1.52% | |
| 358.00 Underground Conductors and Devices | \$ 103,561 | -5.0% | \$ (5,178) | \$ 77,873 | \$ 30,867 | 50.00 | 21.21 | \$ 1,455 | 1.41% | |
| Total Transmission Plant | \$ 733,460,528 | -23.0% | \$ (168,672,505) | \$ 165,080,824 | \$ 737,052,209 | | 65.40 | \$ 11,270,428 | 1.54% | |

OTTER TAIL POWER COMPANY
Summary of Annual Depreciation Accruals for 2023

Statement I

| Account Description | A | Beginning Plant Balance | B | Est. Future Net Salvage Percent | C | D=B*C | Beginning Depreciation Reserve | E | Net Balance | F=B-D-E | Projection Life (Yrs.) | G | Remaining Life (Yrs.) | H | Annual Accrual | I=F/H | Accrual Rate | J=I/B |
|--|----|-------------------------|-----------------|---------------------------------|-------|-------------|--------------------------------|---------------|-------------|---------|------------------------|-------|-----------------------|---|----------------|-------|--------------|-------|
| | | | | | | | | | | | | | | | | | | |
| DISTRIBUTION PLANT | | | | | | | | | | | | | | | | | | |
| 362.00 Station Equipment | \$ | 95,079,235 | \$ | (4,753,962) | -5.0% | \$ | 26,707,725 | \$ | 73,125,472 | | 45.00 | | 36.35 | | \$ 2,011,705 | | 2.12% | |
| 364.00 Poles, Towers and Fixtures | | 86,786,802 | (108,483,503) | -125.0% | | 51,468,242 | | 143,802,063 | | 72.00 | | 50.49 | | | 2,848,130 | | 3.28% | |
| 365.00 Overhead Conductors and Devices | | 60,876,491 | (42,613,543) | -70.0% | | 45,527,170 | | 57,962,864 | | 68.00 | | 46.05 | | | 1,258,694 | | 2.07% | |
| 367.00 Underground Conductors and Devices | | 114,686,120 | (5,734,306) | -5.0% | | 45,055,978 | | 75,364,448 | | 50.00 | | 36.33 | | | 2,074,441 | | 1.81% | |
| 368.00 Line Transformers | | 129,349,816 | 38,804,945 | 30.0% | | 22,201,903 | | 68,342,968 | | 45.00 | | 32.56 | | | 2,098,986 | | 1.62% | |
| 369.00 Overhead Services | | 14,096,890 | (42,290,669) | -300.0% | | 18,687,143 | | 37,700,415 | | 60.00 | | 33.48 | | | 1,126,058 | | 7.99% | |
| 369.10 Underground Services | | 49,935,220 | (24,967,610) | -50.0% | | 23,338,730 | | 51,564,100 | | 55.00 | | 37.18 | | | 1,386,877 | | 2.78% | |
| 370.00 Meters | | 28,155,291 | | | | 10,927,601 | | 17,227,690 | | 30.00 | | 20.46 | | | 842,018 | | 2.99% | |
| 370.05 Smart Meters | | 921,313 | | | | 176,585 | | 744,727 | | 20.00 | | 15.57 | | | 47,831 | | 5.19% | |
| 370.10 Load Management Switches | | 8,899,439 | | | | 8,850,435 | | 49,005 | | 20.00 | | 3.72 | | | 13,173 | | 0.15% | |
| 370.20 Interruption Monitors* | | | | | | | | | | | | | | | | | | |
| 371.10 Electric Vehicle Charging Station | | 26,200 | | | | 7,860 | | 18,340 | | 10.00 | | 6.50 | | | 2,822 | | 10.77% | |
| 371.20 Other Private Lighting | | 9,628,628 | (481,431) | -5.0% | | 502,120 | | 9,607,939 | | 21.00 | | 17.41 | | | 551,863 | | 5.73% | |
| 373.00 Street Lighting and Signal Systems | | 13,235,268 | (1,323,527) | -10.0% | | 1,820,653 | | 12,738,141 | | 20.00 | | 16.47 | | | 773,415 | | 5.84% | |
| Total Distribution Plant | \$ | 611,676,713 | \$(191,843,606) | -31.4% | \$ | 255,272,147 | \$ | 548,248,172 | | | | 36.46 | | | \$15,036,012 | | 2.46% | |
| GENERAL PLANT | | | | | | | | | | | | | | | | | | |
| 390.00 Structures and Improvements | \$ | 23,703,186 | | | | 7,814,233 | | 15,888,953 | | 50.00 | | 33.74 | | | 470,923 | | 1.99% | |
| 390.10 General Office Buildings | | 6,426,445 | 3,001,150 | 46.7% | | 2,626,365 | | 798,931 | | 2040 | | 17.09 | | | 46,748 | | 0.73% | |
| 390.20 Fleet Service Center Buildings | | 746,920 | 531,060 | 71.1% | | 439,647 | | (223,787) | | 2045 | | 21.82 | | | (10,256) | | -1.37% | |
| 390.25 Fleet Service Center Buildings | | 2,154,593 | 3,281,445 | 152.3% | | 89,692 | | (1,216,544) | | 2079 | | 52.47 | | | (23,186) | | -1.08% | |
| 390.30 Central Stores Building | | 4,276,593 | 3,759,126 | 87.9% | | 1,530,417 | | (1,012,950) | | 2045 | | 21.81 | | | (46,444) | | -1.09% | |
| 391.00 Office Furniture* | | 597,122 | | | | 459,997 | | 137,125 | | 15.00 | | 3.82 | | | 39,808 | | 6.67% | |
| 391.10 Office Equipment* | | 233,890 | | | | 143,137 | | 90,753 | | 10.00 | | 4.07 | | | 23,389 | | 10.00% | |
| 391.20 Duplicating Equipment* | | 416,979 | | | | 138,726 | | 278,253 | | 10.00 | | 5.82 | | | 41,698 | | 10.00% | |
| 391.50 Computer Systems* | | 3,412,877 | | | | 1,752,312 | | 1,660,565 | | 5.00 | | 2.02 | | | 682,575 | | 20.00% | |
| 391.60 Computer Related Equipment* | | 2,998,086 | | | | 1,735,330 | | 1,262,757 | | 5.00 | | 1.94 | | | 599,617 | | 20.00% | |
| 394.00 Tools, Shop and Garage Equipment* | | 5,452,464 | | | | 2,897,323 | | 2,555,142 | | 15.00 | | 7.66 | | | 363,498 | | 6.67% | |
| 394.20 Automated Meter Reading Equipment* | | 401,984 | | | | 119,940 | | 282,044 | | 15.00 | | 10.73 | | | 26,799 | | 6.67% | |
| 396.00 Power Operated Equipment | | 1,701,526 | 85,076 | 5.0% | | 312,391 | | 1,304,059 | | 22.00 | | 17.29 | | | 75,423 | | 4.43% | |
| 397.00 Communication Equipment* | | 4,613,872 | | | | 1,418,885 | | 3,194,986 | | 15.00 | | 9.69 | | | 307,591 | | 6.67% | |
| 397.10 Radio Telecommunications Equipment* | | 463,544 | | | | 261,160 | | 202,384 | | 10.00 | | 7.85 | | | 46,354 | | 10.00% | |
| 397.20 Microwave Equipment* | | 3,749,912 | | | | 1,999,209 | | 1,750,703 | | 15.00 | | 6.51 | | | 249,994 | | 6.67% | |
| 397.30 Radio Load Control Equipment* | | 165,980 | | | | 86,872 | | 79,107 | | 10.00 | | 4.25 | | | 16,598 | | 10.00% | |
| 397.40 Communication Equipment - Towers | | 1,922,046 | (96,102) | -5.0% | | 1,061,952 | | 856,196 | | 50.00 | | 29.43 | | | 32,491 | | 1.69% | |
| Total General Plant | \$ | 63,438,020 | \$10,561,755 | 16.6% | \$ | 24,887,587 | \$ | 27,988,678 | | | | 9.51 | | | \$ 2,943,621 | | 4.64% | |
| TOTAL DEPRECIABLE PLANT | \$ | 2,759,955,788 | \$(394,758,805) | -14.3% | \$ | 965,731,053 | \$ | 2,188,983,539 | | | | 40.30 | | | \$54,316,715 | | 1.97% | |

*Amortization Account. (Col. I = Col. B / Col. G)

**OTTER TAIL POWER COMPANY
2024 FIVE-YEAR REVIEW OF DEPRECIATION CERTIFICATION
PROPOSED REMAINING LIVES & SALVAGE %'s FOR USE IN 2025**

| <u>Account Number</u> | <u>Class of Utility Plant</u> | <u>Remaining Life (Yrs) per Depr Study (books dated 12/31/2023)</u> | <u>Remaining Life (Yrs) for 2025 Depr Rate Calculation</u> | <u>Net Salvage (%)</u> | <u>Amortization Period (Yrs)</u> |
|--|---------------------------------------|---|--|------------------------|----------------------------------|
| INTANGIBLES | | | | | |
| 303.91 | Software: 5-year Amortization Period | 3.12 | | | 5 |
| 303.92 | Software: 10-year Amortization Period | 6.44 | | | 10 |
| STEAM PRODUCTION | | | | | |
| <u>Big Stone Plant</u> | | | | | |
| 311-101 | Structures & Improvements | 21.84 | 20.84 | -5.7% | |
| 312-101 | Boiler Plant Equipment | 21.85 | 20.85 | -5.7% | |
| 314-101 | Turbogenerator Units | 21.83 | 20.83 | -5.7% | |
| 315-101 | Accessory Electric Equipment | 21.84 | 20.84 | -5.7% | |
| 316-101 | Misc. Power Plant Equipment | 21.84 | 20.84 | -5.7% | |
| <u>Hoot Lake Plant - Units 2 & 3</u> | | | | | |
| 312.1-102 | Boiler Plant Equipment | 29.31 | 28.31 | 0.0% | |
| <u>Coyote Station</u> | | | | | |
| 311-103 | Structures & Improvements | 17.08 | 16.08 | -8.5% | |
| 312-103 | Boiler Plant Equipment | 17.09 | 16.09 | -8.5% | |
| 314-103 | Turbogenerator Units | 17.10 | 16.10 | -8.5% | |
| 315-103 | Accessory Electric Equipment | 17.08 | 16.08 | -8.5% | |
| 316-103 | Misc. Power Plant Equipment | 17.10 | 16.10 | -8.5% | |
| HYDRAULIC PRODUCTION | | | | | |
| <u>Hoot Lake Hydro Unit</u> | | | | | |
| 331-131 | Structures & Improvements | 36.61 | 35.61 | 0.0% | |
| 332-131 | Reservoirs, Dams & Waterways | 36.47 | 35.47 | 0.0% | |
| 333-131 | Water Wheels, Turbines & Gen. | 36.44 | 35.44 | 0.0% | |
| 334-131 | Accessory Electric Equipment | 36.64 | 35.64 | 0.0% | |
| 335-131 | Misc. Power Plant Equipment | 36.58 | 35.58 | 0.0% | |
| <u>Wright Hydro Unit</u> | | | | | |
| 331-132 | Structures & Improvements | 36.45 | 35.45 | 0.0% | |
| 332-132 | Reservoirs, Dams & Waterways | 36.57 | 35.57 | 0.0% | |
| 333-132 | Water Wheels, Turbines & Gen. | 36.58 | 35.58 | 0.0% | |
| 334-132 | Accessory Electric Equipment | 36.55 | 35.55 | 0.0% | |
| 335-132 | Misc. Power Plant Equipment | 36.56 | 35.56 | 0.0% | |
| <u>Pisgah Hydro Unit</u> | | | | | |
| 331-133 | Structures & Improvements | 36.43 | 35.43 | 0.0% | |
| 332-133 | Reservoirs, Dams & Waterways | 36.62 | 35.62 | 0.0% | |
| 333-133 | Water Wheels, Turbines & Gen. | 36.55 | 35.55 | 0.0% | |
| 334-133 | Accessory Electric Equipment | 36.55 | 35.55 | 0.0% | |
| 335-133 | Misc. Power Plant Equipment | 36.59 | 35.59 | 0.0% | |
| <u>Dayton Hollow Hydro Unit</u> | | | | | |
| 331-134 | Structures & Improvements | 36.63 | 35.63 | 0.0% | |
| 332-134 | Reservoirs, Dams & Waterways | 36.60 | 35.60 | 0.0% | |
| 333-134 | Water Wheels, Turbines & Gen. | 36.55 | 35.55 | 0.0% | |
| 334-134 | Accessory Electric Equipment | 36.52 | 35.52 | 0.0% | |
| 335-134 | Misc. Power Plant Equipment | 36.59 | 35.59 | 0.0% | |
| <u>Taplin Gorge Hydro Unit</u> | | | | | |
| 331-135 | Structures & Improvements | 36.18 | 35.18 | 0.0% | |
| 332-135 | Reservoirs, Dams & Waterways | 36.53 | 35.53 | 0.0% | |
| 333-135 | Water Wheels, Turbines & Gen. | 36.14 | 35.14 | 0.0% | |
| 334-135 | Accessory Electric Equipment | 36.50 | 35.50 | 0.0% | |
| 335-135 | Misc. Power Plant Equipment | 36.57 | 35.57 | 0.0% | |

**OTTER TAIL POWER COMPANY
2024 FIVE-YEAR REVIEW OF DEPRECIATION CERTIFICATION
PROPOSED REMAINING LIVES & SALVAGE %'s FOR USE IN 2025**

| <u>Account Number</u> | <u>Class of Utility Plant</u> | <u>Remaining Life (Yrs) per Depr Study (books dated 12/31/2023)</u> | <u>Remaining Life (Yrs) for 2025 Depr Rate Calculation</u> | <u>Net Salvage (%)</u> | <u>Amortization Period (Yrs)</u> |
|---|-------------------------------|---|--|------------------------|----------------------------------|
| OTHER PRODUCTION | | | | | |
| <u>Jamestown Unit 1</u> | | | | | |
| 341-140 | Structures & Improvements | 16.13 | 15.13 | -7.0% | |
| 342-140 | Fuel Holders & Accessories | 16.14 | 15.14 | -7.0% | |
| 343-140 | Prime Movers | 16.13 | 15.13 | -7.0% | |
| 345-140 | Accessory Electric Equipment | 16.11 | 15.11 | -7.0% | |
| 346-140 | Misc. Power Plant Equipment | 16.15 | 15.15 | -7.0% | |
| <u>Jamestown Unit 2</u> | | | | | |
| 341-142 | Structures & Improvements | 16.14 | 15.14 | -7.0% | |
| 342-142 | Fuel Holders & Accessories | 16.12 | 15.12 | -7.0% | |
| 343-142 | Prime Movers | 16.13 | 15.13 | -7.0% | |
| 345-142 | Accessory Electric Equipment | 16.15 | 15.15 | -7.0% | |
| 346-142 | Misc. Power Plant Equipment | 16.12 | 15.12 | -7.0% | |
| <u>Lake Preston</u> | | | | | |
| 341-141 | Structures & Improvements | 16.14 | 15.14 | -7.9% | |
| 342-141 | Fuel Holders & Accessories | 16.13 | 15.13 | -7.9% | |
| 343-141 | Prime Movers | 16.13 | 15.13 | -7.9% | |
| 345-141 | Accessory Electric Equipment | 16.13 | 15.13 | -7.9% | |
| 346-141 | Misc. Power Plant Equipment | 16.12 | 15.12 | -7.9% | |
| <u>Solway Combustion Turbine Plant</u> | | | | | |
| 341-144 | Structures & Improvements | 14.23 | 13.23 | -1.6% | |
| 342-144 | Fuel Holders & Accessories | 14.23 | 13.23 | -1.6% | |
| 343-144 | Prime Movers | 14.23 | 13.23 | -1.6% | |
| 345-144 | Accessory Electric Equipment | 14.22 | 13.22 | -1.6% | |
| 346-144 | Misc. Power Plant Equipment | 14.23 | 13.23 | -1.6% | |
| <u>Astoria Station</u> | | | | | |
| 341-145 | Structures & Improvements | 31.17 | 30.17 | -2.2% | |
| 342-145 | Fuel Holders & Accessories | 31.17 | 30.17 | -2.2% | |
| 343-145 | Prime Movers | 31.17 | 30.17 | -2.2% | |
| 345-145 | Accessory Electric Equipment | 31.17 | 30.17 | -2.2% | |
| 346-145 | Misc. Power Plant Equipment | 31.17 | 30.17 | -2.2% | |
| <u>Lanadon Wind Energy Center</u> | | | | | |
| 341-160 | Structures & Improvements | 18.05 | 17.05 | -7.6% | |
| 344-160 | Generators | 18.05 | 17.05 | -7.6% | |
| 345-160 | Accessory Electric Equipment | 18.06 | 17.06 | -7.6% | |
| 346-160 | Misc. Power Plant Equipment | 18.07 | 17.07 | -7.6% | |
| <u>Ashtabula Wind Energy Center</u> | | | | | |
| 341-161 | Structures & Improvements | 19.01 | 18.01 | -6.4% | |
| 344-161 | Generators | 19.01 | 18.01 | -6.4% | |
| 345-161 | Accessory Electric Equipment | 19.01 | 18.01 | -6.4% | |
| 346-161 | Misc. Power Plant Equipment | 19.02 | 18.02 | -6.4% | |
| <u>Luverne Wind Energy Center</u> | | | | | |
| 341-162 | Structures & Improvements | 19.96 | 18.96 | -10.5% | |
| 344-162 | Generators | 19.96 | 18.96 | -10.5% | |
| 345-162 | Accessory Electric Equipment | 19.96 | 18.96 | -10.5% | |
| 346-162 | Misc. Power Plant Equipment | 19.97 | 18.97 | -10.5% | |
| <u>Ashtabula III Wind Energy Center</u> | | | | | |
| 341-161 | Structures & Improvements | 23.75 | 22.75 | -12.2% | |
| 344-161 | Generators | 23.75 | 22.75 | -12.2% | |
| 345-161 | Accessory Electric Equipment | 23.75 | 22.75 | -12.2% | |
| 346-161 | Misc. Power Plant Equipment | 23.75 | 22.75 | -12.2% | |
| <u>Merricourt Wind Energy Center</u> | | | | | |
| 341-163 | Structures & Improvements | 30.25 | 29.25 | -8.4% | |
| 344-163 | Generators | 30.25 | 29.25 | -8.4% | |
| 345-163 | Accessory Electric Equipment | 30.25 | 29.25 | -8.4% | |
| 346-163 | Misc. Power Plant Equipment | 30.26 | 29.26 | -8.4% | |

**OTTER TAIL POWER COMPANY
2024 FIVE-YEAR REVIEW OF DEPRECIATION CERTIFICATION
PROPOSED REMAINING LIVES & SALVAGE %'s FOR USE IN 2025**

| <u>Account Number</u> | <u>Class of Utility Plant</u> | <u>Remaining Life (Yrs) per Depr Study (books dated 12/31/2023)</u> | <u>Remaining Life (Yrs) for 2025 Depr Rate Calculation</u> | <u>Net Salvage (%)</u> | <u>Amortization Period (Yrs)</u> |
|------------------------|---|---|--|------------------------|----------------------------------|
| <u>Hoot Lake Solar</u> | | | | | |
| 341-165 | Structures & Improvements | 33.01 | 32.01 | -12.7% | |
| 343-165 | Prime Movers | 33.01 | 32.01 | -12.7% | |
| 345-165 | Accessory Electric Equipment | 33.01 | 32.01 | -12.7% | |
| 346-165 | Misc. Power Plant Equipment | 33.01 | 32.01 | -12.7% | |
| <u>MN Small Solar</u> | | | | | |
| 341-166 | Structures & Improvements | 20.92 | 19.92 | -1.0% | |
| 345-166 | Accessory Electric Equipment | 20.92 | 19.92 | -1.0% | |
| <u>ND Small Solar</u> | | | | | |
| 341-167 | Structures & Improvements | 20.92 | 19.92 | -1.0% | |
| 345-167 | Accessory Electric Equipment | 20.92 | 19.92 | -1.0% | |
| TRANSMISSION | | | | | |
| 353 | Station Equipment | 55.63 | 55.63 | -5.0% | |
| 354 | Towers & Fixtures | 72.24 | 72.24 | -10.0% | |
| 355 | Poles & Fixtures | 65.33 | 65.33 | -50.0% | |
| 356 | Overhead Conductor & Devices | 67.09 | 67.09 | -30.0% | |
| 358 | Underground Conductor & Devices | 11.50 | 11.50 | -5.0% | |
| DISTRIBUTION | | | | | |
| 362 | Station Equipment | 36.38 | 36.38 | -5.0% | |
| 364 | Poles, Towers & Fixtures | 50.55 | 50.55 | -125.0% | |
| 365 | Overhead Conductor & Devices | 46.31 | 46.31 | -70.0% | |
| 367 | Underground Conductor & Devices | 37.78 | 37.78 | -5.0% | |
| 368 | Line Transformers | 32.58 | 32.58 | 30.0% | |
| 369 | Overhead Services | 33.02 | 33.02 | -300.0% | |
| 369.1 | Underground Services | 37.00 | 37.00 | -50.0% | |
| 370 | Meters | 20.00 | 20.00 | | |
| 370.05 | Smart Meters | 14.58 | 14.58 | | |
| 370.1 | Load Management Switches | 3.12 | 3.12 | | |
| 371.10 | Electric Vehicle (EV) Charging Stations | 5.50 | | | 10 |
| 371.20 | Other Private Lighting | 17.17 | 17.17 | -5.0% | |
| 373 | Street Lighting & Signal System | 16.47 | 16.47 | -10.0% | |
| | Utility Vehicle Charging Statons | | | | |
| GENERAL PLANT | | | | | |
| Depreciable | | | | | |
| 390 | Structures & Improvements | 34.67 | 34.67 | | |
| 390.1 | General Office Buildings | 16.14 | 15.14 | 46.5% | |
| 390.20 | Fleet Service Center Buildings - Fergus Falls | 20.89 | 19.89 | 59.1% | |
| 390.25 | Fleet Service Center Buildings - Jamestown | 51.61 | 50.61 | 152.3% | |
| 390.3 | Central Stores Building | 20.87 | 19.87 | 83.7% | |
| 396 | Power Operated Equipment | 16.46 | 16.46 | 5.0% | |
| 397.4 | Communication Towers | 28.67 | 28.67 | -5.0% | |
| Amortizable | | | | | |
| 391 | Office Furniture | 4.82 | | | 15 |
| 391.1 | Office Equipment | 5.06 | | | 10 |
| 391.2 | Duplicating Equipment | 7.62 | | | 10 |
| 391.5 | Computer Systems | 2.77 | | | 5 |
| 391.6 | Computer Related Equipment | 2.65 | | | 5 |
| 394 | Tools, Shop & Garage Equipment | 8.29 | | | 15 |
| 394.2 | Automated Meter Reading Equip. | 9.73 | | | 15 |
| 397 | Communication Equipment | 9.30 | | | 15 |
| 397.1 | Radio Telecom Equipment | 6.85 | | | 10 |
| 397.2 | Microwave Equipment | 6.52 | | | 15 |
| 397.3 | Radio Load Control Equipment | 3.25 | | | 10 |

Source is Statement F from Foster Report

OTTER TAIL POWER COMPANY FIVE-YEAR REVIEW OF DEPRECIATION CERTIFICATION Supplemental Comments

Future Additions and Retirements:

As indicated in the 2024 Technical Update (Attachment 1): “Minnesota State Agency Rules 7825.0700, Subpart 2-B provides that each utility shall disclose a list of any major future additions or retirements to the plant accounts that the utility believes may have a material effect on the current certification results.” (See page 6 of Attachment 1).

Because Otter Tail Power Company (Otter Tail) files prospective depreciation certification filings, it is unaware of any additional major future additions or retirements that will materially affect this filing’s certification results. Future year major additions or retirements will affect future depreciation certification results, historic additions and retirements primarily affect this filings depreciation certification results due to the look back, or historic review back to books dated December 31st of the prior year.

In addition to discussing future additions or retirements that could affect the current certification results, it is the Company’s practice to discuss future (and potential future) additions or retirements that may influence future depreciation expense or future certification results. Historically, Otter Tail provided a synopsis of these types of projects. What follows are updates on current projects or projects being considered.

The Company is working on wind repowering projects at its four General Electric (GE) wind farms. The Commission approved these investments in the Minnesota Resource Cost Recovery Rider in Docket NO. E-017/M-23-496. The Company is also working on additional solar generation facilities and a battery storage project to help meet renewable energy initiatives.

Otter Tail is implementing Advanced Metering Infrastructure (AMI) functionality, an Outage Management System, and a Demand Response System. The Commission has approved an Electric Utility Infrastructure Cost (EUIC) rider and tracker for these investments in Docket No. E-017/M-21-382.

Otter Tail is working with Montana Dakota Utilities Co. to develop, construct and co-own a 95-mile, 345 kV transmission line from Jamestown, North Dakota to Ellendale, North Dakota, a project recently approved by MISO as part of the first phase of MISO’s multi-year Long Range Transmission Planning initiative. The Company has also announced plans to work on a 345 kV line from Big Stone South to Alexandria. The project will help ensure continued electric reliability and improve system resilience in our region.

Finally, Otter Tail will continue to invest in renewing its existing asset mix making additional investments in Transmission, Distribution, and Solar applications. Otter Tail is working on implementing a wind repowering project at some of its older wind farms and is also exploring participation in future MISO Long-Range Transmission Planning projects that support our service territory and the MISO system.

OTTER TAIL POWER COMPANY
2024 FIVE-YEAR REVIEW OF DEPRECIATION CERTIFICATION
Comparison of Resource Plan and Depreciation Filing Retirement Dates

| Generating Unit | Retirement Dates | | | Comments |
|--|--|--|---|---|
| | Resource Plan 2022 - 2036 | 2024 Depreciation Study (Attachment No. 1) | Difference | |
| BASE LOAD RESOURCES | | | | |
| ➤ Big Stone Plant | Jun-2046 | Jun-2046 | None | Big Stone Plant has an Average Year of Final Retirement (AYFR) of 2046. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2046 as its retirement date. The IRP in Appendix F also adopts June, 2046 as the retirement month matching the Depreciation filing. |
| ➤ Coyote Station | Jun-2041 | Jun-2041 | None | Coyote Station has an Average Year of Final Retirement (AYFR) of 2041. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2041 as its retirement date. The IRP in Appendix F also adopts June, 2041 as the retirement month matching the Depreciation filing. |
| WIND | | | | |
| ➤ Langdon Wind Energy Center | Dec-2042 | Jun-2042 | 6 months (outside of IRP study period) | The Langdon Wind Energy Center has an Average Year of Final Retirement (AYFR) of 2042. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2042 as its retirement date. The IRP models the Wind Farms as retiring at the end of retirement year, therefore the IRP uses December, 2042 as its retirement month. |
| ➤ Ashtabula Wind Energy Center | Dec-2043 | Jun-2043 | 6 months (outside of IRP study period) | The Ashtabula Wind Energy Center has an Average Year of Final Retirement (AYFR) of 2043. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2043 as its retirement date. The IRP models the Wind Farms as retiring at the end of retirement year, therefore the IRP uses December, 2043 as its retirement month. |
| ➤ Luverne Wind Energy Center | Dec-2044 | Jun-2044 | 6 months (outside of IRP study period) | The Luverne Wind Energy Center has an Average Year of Final Retirement (AYFR) of 2044. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2044 as its retirement date. The IRP models the Wind Farms as retiring at the end of retirement year, therefore the IRP uses December, 2044 as its retirement month. |
| ➤ Ashtabula III Wind Energy Center | Sep-2038 | Jun-2048 | 9 years, 9 months (outside of IRP study period) | The Ashtabula III Wind Energy Center has an Average Year of Final Retirement (AYFR) of 2048. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2048 as its retirement date. The 2021 IRP modeled Ashtabula III as a Purchase Power Agreement which expires September, 2038. Ashtabula III was acquired by Otter Tail as an owned asset with a 25-year remaining Life in January, 2023. |
| ➤ Merricourt Wind Energy Center | Dec-2055 | Jun-2055 | 6 months (outside of IRP study period) | The Merricourt Wind Energy Center has an Average Year of Final Retirement (AYFR) of 2055. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2055 as its retirement date. The IRP models the Wind Farms as retiring at the end of retirement year, therefore the IRP uses December, 2055 as its retirement month. |
| HYDRO | | | | |
| ➤ 6 units in 5 dams on the Otter Tail River, FERC licensed | No retirement date discussed - IRP assumes operating perpetually | Jun-2062 | Program assumption differences | The IRP assume these permanent hydro dam structures operate perpetually until a final retirement date is established. Depreciation Studies tie the retirement date to the end of the current active FERC hydro operating license. This is the latest date these facilities can operate as generation resources until a new hydro license is granted. OTP received approval of its 40 year FERC Hydro license in February 2022. Therefore the depreciation study utilizing the midyear convention establishes June 2062 as its retirement date. |
| PEAKING FACILITIES | | | | |
| ➤ Jamestown Combustion Turbines - 2 units | Jun-2033 | Jun-2040 | 7 years | In this filing, Otter Tail is requesting a Remaining Life extension of 7 years for the two Jamestown Combustion Turbines resulting in a new Average Year of Final Retirement (AYFR) of 2040. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2040 as its retirement date. The IRP in Appendix F represented the plants former AYFR of June, 2033 as the retirement month. |
| ➤ Lake Preston Combustion Turbine | Jun-2033 | Jun-2040 | 7 years | In this filing, Otter Tail is requesting a Remaining Life extension of 7 years for the Lake Preston Combustion Turbines resulting in a new Average Year of Final Retirement (AYFR) of 2040. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2040 as its retirement date. The IRP in Appendix F represented the plants former AYFR of June, 2033 as the retirement month. |
| ➤ Solway Combustion Turbine | Jun-2038 | Jun-2038 | None | The Solway Combustion Turbine has an Average Year of Final Retirement (AYFR) of 2038. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2038 as its retirement date. The IRP in Appendix F also adopts June, 2038 as the retirement month matching the Depreciation filing. |
| ➤ Astoria Station | Jun-56 | Jun-2056 | None | Astoria Station has an Average Year of Final Retirement (AYFR) of 2056. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2056 as its retirement date. The IRP in Appendix F also adopts June, 2056 as the retirement month matching the Depreciation filing. |
| SOLAR FACILITIES | | | | |
| ➤ Hoot Lake Solar | Dec-2058 | Jun-2058 | 6 months (outside of IRP study period) | The Hoot Lake Solar facility has an Average Year of Final Retirement (AYFR) of 2058. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2058 as its retirement date. The IRP in Appendix F adopts December, 2058 as the retirement month matching the Depreciation filing. |
| ➤ Rush Lake Solar | | Jun-2045 | None | The Rush Lake Solar Facility has an Average Year of Final Retirement (AYFR) of 2045. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2045 as its retirement date. The IRP does not reflect this small 33.4 kW demonstrator facility. |
| ➤ Jamestown Solar | | Jun-2045 | None | The Jamestown Solar Facility has an Average Year of Final Retirement (AYFR) of 2045. The Depreciation Study adopts a mid-year convention where all asset activity is assumed to take place on June 30th of its respective activity years, whether that activity is a plant addition or plant retirement. Therefore the depreciation study has June, 2045 as its retirement date. The IRP does not reflect this small 33.4 kW demonstrator facility. |

Note:

Otter Tail's most recently approved IRP was filed under Docket No. E07-RP-21-339. In the RP, the near-term is intended to be very specific with regard to resource changes, additions, retirements, etc. The long-term is much more uncertain and identifies resources that a utility is likely to use. The depreciation study is intended to be a more exact forecast used for appropriate depreciation expense allocation of our current investment over the current plants remaining life. The RP is far less exact in the long-term, so there can be potential difference because of the intended purposes and assumptions of the two filings.

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of its 2024 Annual Review of Depreciation Certification
Docket No. E017/D-24-**

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Initial Filing**

Dated this **30th** day of **August, 2024**.

/s/ LAURA DEWEY
Laura Dewey
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8604

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|-----------------------------------|---------------------------------------|--|--------------------|-------------------|---|
| Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | 12700 West Dodge Road PO Box 2047 Omaha, NE 68103-2047 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Jessica | Fyhrie | jfyhrie@otpc.com | Otter Tail Power Company | PO Box 496 Fergus Falls, MN 56538-0496 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Amber | Grenier | agrenier@otpc.com | Otter Tail Power Company | 215 S. Cascade St. Fergus Falls, MN 56537 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | 4300 220th St W Farmington, MN 55024 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy Company, Inc. | 11 East Superior St Ste 125 Duluth, MN 55802 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | 220 S 6th St Ste 1300 Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Kavita | Maini | kmaini@wi.rr.com | KM Energy Consulting, LLC | 961 N Lost Woods Rd Oconomowoc, WI 53066 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--|---------------------------------------|--|--------------------|-------------------|---|
| Matthew | Olsen | molsen@otpcco.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Generic Notice | Regulatory | regulatory_filing_coordinator@otpcco.com | Otter Tail Power Company | 215 S. Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th PI E Ste 350 Saint Paul, MN 55101 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Cary | Stephenson | cStephenson@otpcco.com | Otter Tail Power Company | 215 South Cascade Street Fergus Falls, MN 56537 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |
| Stuart | Tommerdahl | stommerdahl@otpcco.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | GEN_SL_Otter Tail Power Company_Otter Tail Power Company_Annual Depreciation |

**Otter Tail Power Company's
2024 Minnesota Annual Review of
Depreciation Certification Filing
Compliance Filing**

Minnesota Docket No. E017/D-24-302

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



April 4, 2025

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of its
2024 Annual Review of Depreciation Certification
Docket No. E017/D-24-302
Compliance Filing**

Dear Mr. Seuffert:

Otter Tail Power Company (Otter Tail Power) hereby submits to the Minnesota Public Utilities Commission, its Compliance Filing regarding the actual depreciation rate calculations for use in calendar year 2025 as referenced in the above docket. The subsequent pages contain Otter Tail Power's 2025 calculated depreciation rates based on the FERC accounts identified in its 2024 depreciation filing. Attachment 1 contains the Excel spreadsheet calculation source document.

On June 29, 2023, the Federal Energy Regulatory Commission (FERC) issued Order No. 898 revising FERC's Uniform System of Accounts (USoA). The Order specified more granularity through new FERC accounts for Solar and Wind production facilities along with Energy Storage facilities. In addition, the Order provided for increased functional recognition of Computer Hardware, Computer Software, and Communications Equipment assets, from the historically prevalent General Plant function to either the Production, Transmission, or Distribution functions depending on which function the assets were primarily utilized in.

The Order effective date was January 1, 2025, and no early adoption was allowed. Plant in service assets and their associated accumulated depreciation reserves were to be transferred from their prior legacy FERC accounts to the new applicable FERC Order No. 898 accounts in as timely a manner as possible in Q1 2025 for inclusion in the utilities Q1 2025 FERC reporting requirements. Existing depreciation parameters were to be retained in the new FERC Order No. 898 accounts as had been previously utilized in their legacy FERC accounts. New asset unitizations for the effective areas are to be assigned to the new FERC accounts on a go forward basis.

To comply with FERC Order No. 898, and to calculate the appropriate 2025 depreciation rates on a prospective basis as is utilized in this filing, Otter Tail Power reclassified its Q1 2025 FERC Order No. 898 asset and accumulated depreciation reserve transfer amounts back to its 12/31/2024 plant in service and accumulated depreciation reserve balances on a Pro -Forma basis. This allowed Otter Tail Power to calculate its 2025 depreciation rates for both its existing legacy FERC accounts as well as its new FERC Order No. 898 accounts all while retaining its 12/31/2024 plant in service and accumulated depreciation reserve balances. The appropriate remaining lives and salvage percentages as approved by the Commission in this docket were retained in the 2025 depreciation rate calculations.

Otter Tail Power electronically filed this document with the Commission which, in compliance with Minn. Rule 7829.1300, subp. 2, also constitutes service on the Department of Commerce, Division of Energy Resources, and the Office of Attorney General-Residential Utilities Division. A Certificate of Service is also enclosed.

Please contact me at (218) 739-8659 or ldemmer@otpc.com if you have any questions.

Sincerely,

/s/ LOYAL K. DEMMER
Loyal K. Demmer, CMA
Senior Depreciation Accountant

lcd
Enclosures
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Otter Tail Power Company's Petition for Approval of its 2024 Annual Review of Depreciation Certification
Docket No. E017/D-24-302**

I, Laura Dewey, hereby certify that I have this day served a copy of the following, or a summary thereof, on Will Seuffert and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company
Compliance Filing**

Dated this 4th day of **April, 2025**.

/s/ LAURA DEWEY

Laura Dewey
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8604

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------|---|-------------------------------|---|--|--------------------|---------------------------|-------------------|-------------------|
| 1 | Ray | Choquette | rchoquette@agp.com | Ag Processing Inc. | | 12700 West Dodge Road PO Box 2047 Omaha NE, 68103-2047 United States | Electronic Service | | No | 24-302D-24-302 |
| 2 | Generic | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | | Office of the Attorney General - Department of Commerce | 445 Minnesota Street Suite 1400 St. Paul MN, 55101 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 3 | Loyal | Demmer | ldemmer@otpc.com | Otter Tail Power Co. | | 215 South Cascade Street PO Box 496 Fergus Falls MN, 56538-0496 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 4 | Sharon | Ferguson | sharon.ferguson@state.mn.us | | Department of Commerce | 85 7th Place E Ste 280 Saint Paul MN, 55101-2198 United States | Electronic Service | | No | 24-302D-24-302 |
| 5 | Jessica | Fyhrie | jfyhrie@otpc.com | Otter Tail Power Company | | PO Box 496 Fergus Falls MN, 56538-0496 United States | Electronic Service | | No | 24-302D-24-302 |
| 6 | Amber | Grenier | agrenier@otpc.com | Otter Tail Power Company | | 215 S. Cascade St. Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |
| 7 | Adam | Heinen | aheinen@dakotaelectric.com | Dakota Electric Association | | 4300 220th St W Farmington MN, 55024 United States | Electronic Service | | No | 24-302D-24-302 |
| 8 | Nick | Kaneski | nick.kaneski@enbridge.com | Enbridge Energy Company, Inc. | | 11 East Superior St Ste 125 Duluth MN, 55802 United States | Electronic Service | | No | 24-302D-24-302 |
| 9 | James D. | Larson | james.larson@avantenergy.com | Avant Energy Services | | 220 S 6th St Ste 1300 Minneapolis MN, 55402 United States | Electronic Service | | No | 24-302D-24-302 |
| 10 | Kavita | Maini | kmains@wi.rr.com | KM Energy Consulting, LLC | | 961 N Lost Woods Rd Oconomowoc WI, 53066 United States | Electronic Service | | No | 24-302D-24-302 |
| 11 | Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | | 33 South Sixth St Ste 4200 Minneapolis MN, 55402 United States | Electronic Service | | No | 24-302D-24-302 |
| 12 | Matthew | Olsen | molsen@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |
| 13 | Generic Notice | Regulatory | regulatory_filing_coordinators@otpc.com | Otter Tail Power Company | | 215 S. Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | Yes | 24-302D-24-302 |

| # | First Name | Last Name | Email | Organization | Agency | Address | Delivery Method | Alternate Delivery Method | View Trade Secret | Service List Name |
|----|----------------|--------------------------------|--------------------------------------|--------------------------|---|---|--------------------|---------------------------|-------------------|-------------------|
| 14 | Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | | Office of the Attorney General - Residential Utilities Division | 1400 BRM Tower 445 Minnesota St St. Paul MN, 55101-2131 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 15 | Will | Seuffert | will.seuffert@state.mn.us | | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul MN, 55101 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 16 | Cary | Stephenson | cstephenson@otpc.com | Otter Tail Power Company | | 215 South Cascade Street Fergus Falls MN, 56537 United States | Electronic Service | | Yes | 24-302D-24-302 |
| 17 | Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | | 215 S Cascade St PO Box 496 Fergus Falls MN, 56537 United States | Electronic Service | | No | 24-302D-24-302 |