

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

**In the Matter of Otter Tail Power Company's
Application for Approval of a New Class for
Very Large Customer Class and Associated
Rate Schedules**

Case No. PU-26-215

**PETITION TO INTERVENE OF
GERONIMO POWER, LLC**

Pursuant to N.D. Admin. Code § 69-02-02-05, Geronimo Power, LLC (“Geronimo Power”) hereby petitions the North Dakota Public Service Commission (“Commission”) for intervention as a party in the above-captioned proceeding. In support, Geronimo Power states as follows:

1. Grounds for Intervention

N.D. Admin. Code § 69-02-02-05(1) provides that a petition to intervene must set forth the grounds for intervention. Geronimo Power is a renewable energy development company headquartered in Minneapolis, Minnesota, with nearly 3,000 megawatts (“MW”) of operational or under-construction wind, solar, and energy storage projects across the Midcontinent Independent System Operator, Inc. (“MISO”), Southwest Power Pool, and Electric Reliability Council of Texas footprints, with an additional 20 gigawatts of projects in development. Geronimo Power develops, finances, constructs, and operates utility-scale generation and data center energy parks for large industrial and commercial customers.

Otter Tail Power Company (“OTP”) has applied for Commission approval of a new Very Large Customer (“VLC”) class and an associated Large General Service – Tier III – High Power Compute rate schedule (“HPC Rate”). As a renewable energy developer active throughout MISO’s footprint, Geronimo Power develops and may procure or supply generation resources, including through power purchase agreements and/or “Dedicated Resources” arrangements, to serve VLCs that take service under the tariff proposed in this docket.

Geronimo Power accordingly has a legal interest that may be substantially affected by this proceeding, which is not adequately represented by other parties to this proceeding. Moreover, Geronimo Power’s intervention will not unduly broaden the issues or delay this proceeding, as Geronimo Power has and will adhere to the procedural schedule the Commission establishes in this proceeding.

2. Position and Interest of Petitioner; Contribution to the Proceeding

ND Admin. Code § 69-02-02-05(1) provides that a petition to intervene must also provide the position and interest of the petitioner, and what the petitioner will contribute to the hearing. As noted above, Geronimo Power has an interest in this proceeding as an independent renewable energy developer and prospective resource provider to VLC customers under OTP’s tariff. In this proceeding, Geronimo Power will provide the Commission with the perspective of an active generation developer in the MISO footprint regarding OTP’s tariff. Geronimo Power anticipates offering comments or evidence, as appropriate, on: (a) the treatment of Dedicated Resources and alternative procurement methods under the proposed tariff; (b) the design of collateral and credit support requirements applicable to VLCs and their generation counterparties; (c) the appropriate scope of any risk adder applied to power purchase agreement revenues; (d) the definition and administration of any system benefit charge; and (e) other aspects OTP’s proposed tariff and issues related to resource procurement for the new VLC class.

3. Position in Support of or Opposition to Relief Sought

ND Admin. Code § 69-02-02-05(1) further provides that the petitioner must state whether the petitioner's position is in support of or in opposition to the relief sought. Geronimo Power does not oppose approval of a VLC class and HPC Rate in this docket and generally supports the tariff's Dedicated Resources construct and associated provisions. Geronimo Power anticipates recommending refinements to certain aspects of OTP's proposed rate design.

4. Timeliness

The Commission's Notice of Opportunity for Hearing in this docket directs that comments and requests for hearing be received by September 7, 2026, and states that the Commission may determine the matter without a formal hearing. Geronimo Power understands that the Commission has scheduled an informal hearing in this matter for September 23 at 2:30 p.m. This Petition is filed in advance of that date and is therefore timely under N.D. Admin. Code § 69-02-02-05(2).

WHEREFORE, Geronimo Power, LLC respectfully requests that the Commission grant this Petition and admit Geronimo Power, LLC as an intervenor and party to this proceeding.

Dated: August 28, 2026

Respectfully submitted,



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