BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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	:	EL 25-035
IN THE MATTER OF OTTER TAIL POWER COMPANY'S PETITION FOR APPROVAL OF A REVISED REAL TIME PRICING RATE SECTION 14.02	: :	PETITION TO INTERVENE

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Under ARSD 20:10:01:15.02, Valley Queen Cheese Factory, Inc., moves that the Commission allow it to intervene as a party in this matter. Valley Queen is interested in the docket for the reasons that follow.

1. Valley Queen is a South Dakota corporation with its principal place of business in Millbank, South Dakota, where it makes and distributes cheese and dairy products. Valley Queen's business address is 201 South Dakota Street, Milbank, SD 57252, and its telephone number is (605) 432-4563.

2. On October 21, 2025, Otter Tail Power company filed a petition for approval of a revised real-time pricing rate under Section 14.02 of its tariff. As stated in its petition, Otter Tail has developed a new model to replace its current real-time pricing rate, the pricing methodology for which, as developed and approved over 25 years ago, "relies on a resource stack model to estimate the marginal resource serving load each hour, rather than replicating MISO's Day-Ahead and Real-Time Locational Marginal Prices." (Petition at 3.) Otter Tail's proposed new rate is intended to be responsive to real-time market conditions and to provide customers with the "opportunity to make economically informed decisions based on actual market signals." (*Id.*)

3. Valley Queen is Otter Tail's only South Dakota customer that has elected to receive service pursuant to Otter Tail's current real-time pricing rate.

4. Valley Queen and Otter Tail began discussing Otter Tail's intention to develop a new real-time pricing methodology almost two years ago. The parties met at Otter Tail's headquarters in Fergus Falls in March 2024 to discuss Otter Tail's intention.

5. Valley Queen and Otter Tail met most recently to discuss Otter Tail's proposed filing for approval of a new real-time pricing methodology on October 20, 2025, the eve of Otter Tail's filing with the Commission. At the meeting, Otter Tail provided a general overview of its proposed new methodology and filing.

6. Otter Tail filed its petition the next day, on October 21, 2025, and provided notice to Valley Queen of the filing on October 24, 2025.

7. Valley Queen recently filed a consumer complaint against Otter Tail about Otter Tail's application of its phase-in rider to the real-time pricing portion of Valley Queen's bill. Valley Queen's complaint was docketed before the Commission as EL 25-026. The parties stipulated to a dismissal of the complaint based on Otter Tail's representation that it would soon seek Commission approval of a real-time pricing rate to which its phase-in rider would not apply. Valley Queen's complaint was dismissed without prejudice by order dated October 27, 2025.

8. As the only South Dakota customer receiving service pursuant to Otter Tail's real-time pricing rate, Valley Queen seeks further, detailed information about Otter Tail's proposed new rate and how service pursuant to the proposed new rate would compare to the current rate.

9. Valley Queen is encouraged by Otter Tail's filing but is otherwise unable to state its position in this proceeding before it receives additional information.

Wherefore, Valley Queen asks the Commission to grant it party status to protect its interest as an affected customer and to ensure that it receives timely and appropriate information necessary for it to make decisions about its position in this proceeding, whether to object to the

petition for any reason, and whether to receive service pursuant to the proposed new rate if approved.

Dated this 29th day of October, 2025.

WOODS, FULLER, SHULTZ & SMITH P.C.

By /s/ James E. Moore

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