



2024 Political Expenditures Report

Role of the Corporate Governance Committee

The Otter Tail Corporation Corporate Governance Committee conducts an annual review of political contributions and lobbying activities under our Political Contributions and Lobbying Policy ("Policy"). This Committee is responsible for providing recommendations to the Board if there is a desired change to the process or Policy.

2024 Review

Ballot Measure Campaign Contributions

Otter Tail Power Company, a wholly owned subsidiary of Otter Tail Corporation, donated funds in opposition to a North Dakota ballot measure in 2024. The donation was less than \$2,500.

Candidate Campaign Contributions

No corporate funds were given to individual political campaigns and no corporate funds were used to advocate for or against a candidate in 2024.

Political Action Committees

Otter Tail Power Company has established one state and one combined state and federal Political Action Committee ("PAC"), and is compliant with reporting all PAC receipts and donations. Each PAC has a board or steering committee responsible for reviewing and approving federal, state and local political contribution requests. All PAC activities (including solicitation and contributions to parties and candidates) are governed and overseen by their respective governing bodies.

Trade Association Dues and Lobbying Expenses

Contributions to Trade Associations

Otter Tail Corporation, and its operating companies, belong to various trade associations, many of which are organizations operating under Section 501(c)(4) or (6) of the Internal Revenue Code. Certain of these trade associations engage in lobbying activities, advocating for the interests of the respective industry or broader business community. We report below the portion of trade association dues used for lobbying purposes.

Trade Association Dues Subject to Sec. 162(e)		
Trade Association	Type	Portion of Dues Relating to Lobbying Expenses
American Clean Power	501(c)(6)	\$ 3,300
Edison Electric Institute	501(c)(6)	32,604
Fargo Moorhead West Fargo Chamber of Commerce	501(c)(6)	500
Greater North Dakota Chamber of Commerce	501(c)(6)	1,016
Lignite Energy Council	501(c)(6)	8,912
Minnesota Business Partnership	501(c)(6)	12,626
Minnesota Chamber of Commerce	501(c)(6)	9,091
Minnesota Utility Investors	501(c)(4)	8,400
National Association of Manufacturers	501(c)(6)	2,662
South Dakota Electric Utility Companies	501(c)(6)	11,168
Other	501(c)(4) or (6)	1,288
Total		\$ 91,567

Regulatory and Legislative Direct Lobbying Expenses

Otter Tail Corporation has a responsibility to participate in the formation of sound public policies to protect the interests of the company and its stakeholders. As a result, we engage with legislators and regulators on a wide range of topics that could impact our electric utility operations. Funds expended for legislative lobbying are not recovered from electric consumers in rates.

The amounts reported reflect direct lobbying expenditures by the electric utility, exclusive of amounts paid for lobbying costs as part of annual trade association dues, which are included in the previous table.

Lobbying Expenses					
Jurisdiction	Legislative		Regulatory		Requirements
	2024	2023	2024	2023	
Federal	\$ -	\$ -	\$ -	\$ -	Federal Lobbying Disclosure Act ¹
Minnesota ²	\$180,000	\$180,000 ³	\$417,000	\$60,000	Minnesota Campaign Finance and Public Disclosure Board
North Dakota ⁴	\$23,250	\$ -	\$ -	\$ -	North Dakota External Lobbying Costs
South Dakota ⁵	\$ -	\$ -	\$ -	\$ -	South Dakota External Lobbying Costs

¹ We do not meet the threshold for qualifying as a federal lobbyist and the amounts here only reflect external lobbying costs and do not include Otter Tail Power Company's internal labor costs.

² Under Minnesota law, lobbying includes attempting to influence either legislation or "administrative action" as defined by Minnesota law. "Administrative action" includes costs incurred for rate proceedings, siting dockets and certificates of need. The amounts reported for Minnesota reflect external lobbying costs as well as Otter Tail Power Company's internal labor costs related to lobbying as defined under Minnesota law. In 2024, a significant amount of lobbying expenses were incurred in association with a certificate of need proceeding before the Minnesota Public Utilities Commission and related route/siting permit for a transmission line in which Otter Tail Power Company is an owner.

³ Otter Tail Power Company recently submitted an update to the Minnesota Campaign Finance and Public Disclosure Board to correct an error in the 2023 legislative lobbying expense. The amount reported here corresponds to the updated report.

⁴ The amounts reported for North Dakota reflect only external lobbying costs and do not include Otter Tail Power Company's internal labor costs.

⁵ The amounts reported for South Dakota reflect only external lobbying costs and do not include Otter Tail Power Company's internal labor costs.