

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

APPLICATION FOR PROTECTIVE ORDER
AND TRADE SECRET PROTECTION
OF NORTH DAKOTA OILSEED MILLS LLC

RECEIVED

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PUBLIC SERVICE COMMISSION

North Dakota Oilseed Mills LLC ("NDOM") hereby moves the North Dakota Public Service Commission ("Commission") for an Order under Chapter 69-02-09 and section 69-02-09-04 of the North Dakota Administrative Code granting Trade Secret Protection to certain of the materials filed by NDOM in compliance with North Dakota Administrative Code section 69-09-05-12(3) and section 69-09-05-12.1 in order to respond to inquiries given by the Public Service Commission in their letter to Ms. Rachel Hellyer, Treasurer of NDOM, on July 9, 2010, in conjunction with NDOMs' Grain Warehouse License application.

Description. The information NDOM wishes to be designated as Confidential is contained in an envelope that is marked "TRADE SECRET – PRIVATE."

1. In General, the information consists of:
 - a. The Full Business Plan including identification of potential customers, suppliers, and an analysis of competitive advantages and positions.
 - b. The full Financial Projections, including all assumptions and supporting data used to prepare this analysis.
 - c. The Credit and Security Agreement between NDOM and Sodrugestvo B.V. in its entirety.
2. The information bears the Trade Secret designation for a variety of reasons. The information is derived from past operational data for the facility that would be not readily available to competitors in the general domain.
3. The information would give competitors a significant financial advantage in knowing and understanding our overhead cost structure, fixed costs, liquidity terms, and other financial information.
4. The information could also give competitors a significant Marketing advantage in knowing and understanding our sourcing, pricing and other marketing structures.
5. A General description of persons or entities that could obtain economic value from the disclosure or use of the information includes other crushing facilities in the states of North Dakota, Minnesota or South Dakota or the Provinces of Manitoba, Alberta, or Saskatchewan. Elevators and others competing for canola sources may find the information useful in their marketing strategies against NDOM.

Dated at Grand Forks, ND, this 17th day of July, 2010.

North Dakota Oilseed Mills LLC



By: Rachel Hellyer
Its: Treasurer