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October 30, 2017



Darrell Nitschke
Executive Secretary
ND Public Service Commission
600- East Boulevard Avenue
Bismarck, ND 58505-0480

**PUBLIC DOCUMENT – NOT PUBLIC (OR
PRIVILEGED) DATA HAS BEEN EXCISED**

**RE: Otter Tail Power Company
Minn-Kota Ag Products Inc. – Richland County
Public Convenience & Necessity
Case No. PU-17-96
OTP – Late Filed Exhibit 1
OTP – Late Filed Exhibit 5**

Dear Mr. Nitschke:

Please find enclosed for filing the following Late Filed Exhibits in the above-entitled matter, which came up for hearing on October 23, 2017:

1. OTP – Late Filed Exhibit 1
2. OTP – Late Filed Exhibit 5

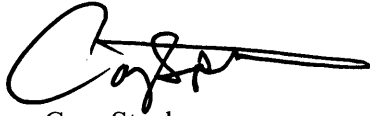
With respect to OTP - Late Filed Exhibit 5, it is OTP's understanding that Administrative Law Judge Ward ruled during the hearing that such information was protected and that an order to that point was forthcoming. Therefore, OTP has not filed a separate application for trade secret protection under ND Admin. Code Chapter 69-02-09. To the extent such an application is deemed necessary, OTP hereby request such protection for OTP - Late Filed Exhibit 5. The information provided in that exhibit includes the name and certain load factor data of facilities used for comparison purposes in determining the correct load factor estimate for the proposed

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Letter enclosing late filed exhibits OTP-LF1 and protected OTP-LF 5
Otter Tail Power Company
Cary Stephenson, Assoc. General Counsel

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Minn-Kota facility. Specifically, page 1 and 2 OTP Late Filed Exhibit 5 are the facilities OTP witness Christopher Waltz testified as being the most suitable for comparison purposes. Pages 3, 4, 5 and 6 are facilities that were useful for examination but not as useful as the facilities noted on pages 1 and 2. This information is trade secret under N.D. Cent. Code §§ 47-25.1-01(4). This information has independent economic value from not being generally known by other persons who can obtain economic value from its disclosure. This information is held in confidence by OTP for its customers and OTP has internal policies against public disclosure of such data. This information also qualifies for perfection as "commercial information" under NDCC 44-04-18.4(2)(a) and "proprietary information" under NDCC 44-04-18.4(2)(a) and "proprietary information" under NDCC 44-04-18.4(2)(c)(5). Consistent with 69-02-09-02 the protected material referenced above is being filed in a sealed envelope labeled: PROTECTED INFORMATION - PRIVATE.

Sincerely,



Cary Stephenson
Associate General Counsel

ljh
Enclosures

Cc:
ALJ Patrick J. Ward
Kimberly J. Radermacher
Zachary Pelham