

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION



Case No.: PU-17-120

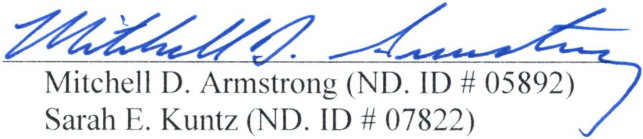
Northern State Power Company
Advance Prudence – 1,550 MW Wind Portfolio
Application

**ADVOCACY STAFF’S RESPONSE TO NORTHERN STATE POWER’S MARCH
29, 2017, APPLICATION FOR TRADE SECRET PROTECTION AND
ADVOCACY STAFF’S APPLICATION FOR TRADE SECRET PROTECTION
FOR JAMES A. HEIDELL’S TESTIMONY**

On March 29, 2017, NSP filed its application for advance determination of prudence. Along with the application, NSP requested certain documents be granted trade secret protection. Advocacy Staff does not contest the designation of the requested information as “trade secret.”

As Advocacy Staff has prepared its case and testimony in this case, it has entered into a *Protective Agreement* with NSP in order to expedite discovery and the presentation of testimony. In that agreement, Advocacy Staff has agreed to also file any information designated by NSP as trade secret in the manner allowed pursuant to N.D.A.C. ch. 69-02-09. Accordingly, Advocacy Staff requests Trade Secret designation to file the complete testimony of James A. Heidell as trade secret as certain portions of his testimony and some of the exhibits include information designated as trade secrets by NSP. Advocacy Staff relies upon the reasons provided for trade secret protection in NSP’s March 29, 2017, *Application for Trade Secret Protection*.

Dated this 1st day of August, 2017.

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