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November 5, 2019

Mr. Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0408

**RE: Annual Report of Trade Secret Status
Otter Tail Power Company -Advance Prudence - Astoria
Project Application, Case No. PU-17-140
Otter Tail Power Company- Advance Prudence – Merricourt
Project Application, Case No. PU-17-141
Otter Tail Power Company Certificate of Public Convenience &
Necessity - Merricourt Project Application, Case No. PU-17-143**

Dear Mr. Kahl:

On November 3, 2017 the North Dakota Public Service Commission issued an Order on Settlement in the above-described cases granting Otter Tail Power Company's (OTP or Company) request for an advance determination of prudence for the Company's Merricourt Wind Project and Astoria Natural Gas Project. The Commission also granted a Certificate of Public Convenience and Necessity for the Merricourt Wind Project.

During these consolidated matters the Commission granted trade secret protection to certain information designated as trade secret by the Company. The Settlement Agreement approved by the Commission requires OTP to periodically inform the Commission whether trade secret protection is still necessary. Specifically, section 7(d) of the Settlement Agreement provides:

On at least an annual basis, and as more frequently as maybe advisable, OTP shall file a letter with the Commission in these cases advising whether the trade secret information must remain trade secret or if it may be made public.

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77	PU-17-143	Filed 11/05/2019	Pages: 2
			Compliance filing – Annual letter concerning need for trade secret protection
78	PU-17-141	Filed 11/05/2019	Pages: 2
			Compliance filing – Annual letter concerning need for trade secret protection
73	PU-17-140	Filed 11/05/2019	Pages: 2
			Compliance filing – Annual letter concerning need for trade secret protection

This filing is the OTP's annual letter concerning the need for trade secret protection. The following information is no longer trade secret and may be made public:

- The reference to "\$270 million" in estimated total capital costs in the first full paragraph of page 7 of the Non-Public version of Otter Tail's Initial Filing in *Otter Tail Power Company- Advance Prudence – Merricourt Project Application, Case No. PU-17-141*, filed April 10, 2017.
- The reference to "\$270 million" in line 3, page 3 of the Non Public version of the Direct Testimony of Bradley E. Tollerson submitted with Otter Tail's Initial Filing in *Otter Tail Power Company- Advance Prudence – Merricourt Project Application, Case No. PU-17-141*, filed April 10, 2017.
- The reference to "\$270 million" in line 15 and line 25 (chart), page 4 of the Non Public version of the Direct Testimony of Harvey McMahon submitted with Otter Tail's Initial Filing in *Otter Tail Power Company- Advance Prudence – Merricourt Project Application, Case No. PU-17-141*, filed April 10, 2017.
- The reference to "\$270 million" in line 1, page 13 of the Non-Public Version of the Direct Testimony of James A. Heidell submitted with Staff's Response to Otter Tail's Initial Filing in *Otter Tail Power Company- Advance Prudence – Merricourt Project Application, Case No. PU-17-141*, filed August 18, 2017

All remaining trade secret designations granted in the above referenced matters should continue to remain trade secret.

This report has been electronically filed. Enclosed you will find an original and seven (7) copies. If you have any questions regarding this report, please contact me at (218) 739-8956 or at cstephenson@otpc.com.

Sincerely,

/s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel

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By electronic filing and US mail