

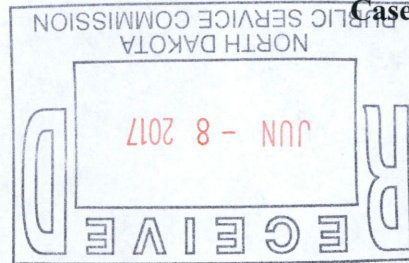
STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

Otter Tail Power Company
Advance Prudence – Merricourt Wind
Application

Case No. PU-17-141

Otter Tail Power Company
PC&N – Merricourt Wind
Application

Case No. PU-17-143



APPLICATION FOR TRADE SECRET PROTECTION

Pursuant to N.D. Admin. Code §§ 69-02-09-01 and 69-02-09-04, Otter Tail Power Company (Otter Tail) respectfully requests that the Commission issue a trade secret protective order in the above-referenced cases. The purpose of the requested protective order is to protect against public disclosure of trade secret or proprietary information, as defined by N.D. Cent. Code §§ 47-25.1-01(4) or 44-04-18.4.

The specific information for which Otter Tail seeks trade secret protection includes the following items contained in Otter Tail's response to Advocacy Staff's Information Request Nos. ND-PSC-01.12 and ND-PSC-01.13

- Otter Tail's Response to IR 01.12 includes levelized cost data for the Merricourt Project assuming 25 and 40-year project life spans.
- Otter Tail's Response to IR 01.13 includes confidential terms regarding a Turbine Supply Agreement and a Service and Maintenance Agreement between EDF and Vestas in which OTP has collateral rights and which will be assigned to Otter Tail at the completion of the Merricourt Project.

This information has been marked as TRADE SECRET in the Application and supporting testimony.

The above-referenced information is either not publicly available, is confidential business information, was prepared specifically for Otter Tail with data inputs unique to Otter Tail, or is subject to agreements that require the ongoing confidentiality of the information. The confidentiality of this information has been maintained by Otter Tail. The information, therefore, is not readily ascertainable by proper means by other persons.

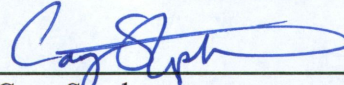
Vendors and competitors would have an opportunity to obtain economic value from disclosure or use of the information, to the detriment of Otter Tail and the customers we serve. If publicly available, vendors could use the information to their advantage in competing for project procurement opportunities, while competitors could use the information to leverage their rate positions in the marketplace to Otter Tail's detriment.

In accordance with N.D. Admin. Code § 69-02-09-02, one copy of the trade secret material is provided in the enclosed sealed envelope labeled PROTECTED INFORMATION – PRIVATE.

Respectfully submitted this 5th day of June, 2017.

OTTER TAIL POWER COMPANY

By



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