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December 18, 2025



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: Otter Tail Power Company's Annual Compliance Filing: Economic Development Rider Model
Case No. PU-17-238
Compliance Filing**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail) hereby submits to the North Dakota Public Service Commission (Commission) its annual compliance filing in the above-referenced matter. Per the Commission's Order in this docket, the Company "... will provide annual filings that will confirm its compliance with the provisions of the EDR and provide updated costs used in the formula for calculating an Economic Development Rate."

In accordance with N.D. Admin. Code § 69-02-09-02, an Application for Trade Secret Protection is being sent along with the compliance filing. The trade secret version of Attachment 1 in Excel format is being sent to the Commission via the State of North Dakota Secure File Transfer System, and is marked **NOT PUBLIC**.

Copies have been sent to you via USPS.

Please contact me at (218) 739-8301 or awang@otpc.com if you have any questions regarding this filing.

Sincerely,

/s/ ANDY WANG
Andy Wang
Pricing Analyst
Regulatory Administration

kde
Enclosures
By electronic filing and U.S. mail

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Compliance Filing - ND Economic Development Rider -
Redacted
Otter Tail Power Company

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

**In the Matter of Otter Tail Power Company's
Annual Compliance Filing
Economic Development Rider Model**

Case No. PU-17-238

APPLICATION FOR TRADE SECRET PROTECTION

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

Otter Tail Power seeks trade secret protection for the live tracker, provided separately in an Excel spreadsheet, for the purpose of protecting the formulas and models set forth in the live spreadsheet, which are proprietary to Otter Tail Power. To be clear, the revenue and financial data set forth in the live tracker is public information and is provided in Attachment 1.

The formulas and models in the live tracker are not publicly available, are confidential and proprietary business information, and were prepared specifically for Otter Tail Power with data inputs unique to the Company. The confidentiality of this information has been maintained by Otter Tail Power. The information, therefore, is not readily ascertainable by proper means by other persons. Disclosure of the propriety formulas and models would potentially result in the loss of valuable intellectual property, to the benefit of third parties including other electric service providers, to the ultimate detriment of Otter Tail Power and its customers.

In accordance with N.D. Admin. Code § 69-02-09-02, and Commission staff's request, a live copy of the Excel file containing trade secret material will be uploaded to the secure portal using a link provided by staff and will be marked as **NOT PUBLIC**.

Dated: December 18, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By /s/ LAUREN DONOFRIO

Lauren Donofrio

Senior Associate General Counsel

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