

*Attorneys At Law*

332 Minnesota Street  
Suite W2750  
St. Paul, MN 55101  
Telephone: 651-767-3740  
Facsimile: 651-228-9161  
[www.martinsquires.com](http://www.martinsquires.com)

June 1, 2018

*Richard J. Savelkoul*  
*Direct Dial # 651-767-3745*  
[rsavelkoul@martinsquires.com](mailto:rsavelkoul@martinsquires.com)

**VIA EMAIL ([pward@zkslaw.com](mailto:pward@zkslaw.com)) AND U.S. MAIL**

The Honorable Patrick J. Ward  
Administrative Law Judge  
Zuger Kirmis & Smith  
P.O. Box 1695  
Bismarck, ND 58502-1695  
701-223-2711

Re: ND PUC Docket PU-17-398/Otter Tail Power Rate Increase  
Our File No. 2035-17

Dear Judge Ward:

Enclosed for your consideration in the above-referenced matter, please find Midwest Large Energy Consumer Group's ("MLEC") Application to View Protected Information. To be clear, MLEC has no objection to trade secret protection requests of the Public Service Commission Advocacy Staff or Otter Tail Power.

Thank you for your attention to this matter. Please let me know if you have any questions.

Very truly yours,

/s/ Richard J. Savelkoul  
Richard J. Savelkoul

RJS:lmr  
Enclosure

cc: ND Public Service Commission, Darrell Nitschke, Executive Secretary  
Service List

STATE OF NORTH DAKOTA  
BEFORE THE  
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of	)	Docket No. PU-17-398
Otter Tail Power Company for	)	
Authority to Increase Rates for	)	<b>APPLICATION TO VIEW</b>
Electric Service in North Dakota	)	<b>PROTECTED INFORMATION</b>
	)	

Pursuant to N.D. Admin. Code 69-02-09-07(2), Midwest Large Energy Consumers Group (“MLEC”) respectfully requests access to view protected information provided to the North Dakota Public Service Commission (“Commission”) by Otter Tail Power (“OTP”).

This written request includes the following:

1. Name and address of who will view the information.

Richard J. Savelkoul  
332 Minnesota Street, Suite W2750  
St. Paul, MN 55101

Kavita Maini  
961 North Lost Woods Road  
Oconomowoc, WI 53066

Larry Schedin  
332 Minnesota Street, Suite W1390  
St. Paul, MN 55101

2. Identification as specifically possible, of the information requested.

Sales and revenue forecast data and methodologies contained in the Direct Testimony, attachments and supporting schedules of OTP witness Brian H. Draxten; and

Employee compensation and benefits data, surveys and benchmarking contained in the Direct Testimony, attachments and supporting schedules of OTP witness Peter E. Wasberg.

Testimony of Public Service Commission Advocacy Staff Witnesses Aaron Rothschild, David Dismukes and Ralph Smith.

3. A showing of good cause why the information is needed.

The information will have an impact on rates paid by MLC members.

4. Identification of the purpose of the review.

For analysis and possible use in testimony on or at hearing in the proceeding.

5. Identification of the intended use of the information.

For possible use in MLEC testimony or in cross examination in the proceeding.

6. An estimate of the time needed for review.

The information will be needed for a period of time including and through resolution of the proceeding.


MLEC does not object to the above information being classified as trade secrets or protected information. As per N.D. Admin. Code §69-02-09-07(3), please provide us with the protective agreement for execution.

Respectfully submitted,

Dated: June 1, 2018

MARTIN & SQUIRES, P.A.

By



Richard J. Savelkoul (ND ID #6793)  
332 Minnesota Street, Suite W2750  
St. Paul, MN 55101  
(651)767-3745  
[rsavelkoul@martinsquires.com](mailto:rsavelkoul@martinsquires.com)

**ATTORNEY FOR MIDWEST  
LARGE ENERGY CONSUMERS  
GROUP**

STATE OF NORTH DAKOTA  
BEFORE THE  
NORTH DAKOTA PUBLIC SERVICE COMMISSION

In the Matter of the Application of )  
Otter Tail Power Company for )  
Authority to Increase Rates for )  
Electric Service in North Dakota )  
)

Docket No. PU-17-398

**CERTIFICATE OF SERVICE**

Richard Savelkoul certifies that on the 1<sup>st</sup> day of June, 2018, he served a true and correct copy of the attached MLEC'S APPLICATION TO VIEW PROTECTED INFORMATION by email, addressed to the following individuals:

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
P.O. Box 496  
Fergus Falls, MN 56358-0496  
[cstephenson@otpc.com](mailto:cstephenson@otpc.com)

Illona Jeffcoat-Sacco  
General Counsel  
ND Public Service Commission  
600 East Boulevard Avenue, Dept. 408  
Bismarck, ND 58505-0480  
[ils@nd.gov](mailto:ils@nd.gov)

John Schuh  
Special Assistant Attorney General  
ND Public Service Commission  
600 East Boulevard Avenue, Dept. 408  
Bismarck, ND 48505-0480  
[jschuh@nd.gov](mailto:jschuh@nd.gov)

Darrell Nitschke  
Executive Secretary  
ND Public Service Commission  
600 East Boulevard Avenue, Dept. 408  
Bismarck, ND 48505-0480  
[dnitschk@nd.gov](mailto:dnitschk@nd.gov)

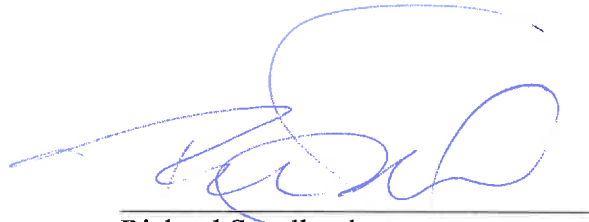
Zachary Pelham  
Advocacy Staff Counsel  
Pearce-Durick PLLC  
P.O. Box 400  
Bismarck, ND 58502  
[zep@pearce-durick.com](mailto:zep@pearce-durick.com)

Patrick Ward  
Administrative Law Judge  
Zuger Kirmis & Smith  
P.O. Box 1695  
Bismarck, ND 58501  
[pward@zkslaw.com](mailto:pward@zkslaw.com)

Rebecca L. Mann  
Gunderson, Palmer, Nelson & Ashmore, LLP  
P.O. Box 8045  
Rapid City, SD 57709-8045  
[rmann@gpna.com](mailto:rmann@gpna.com)

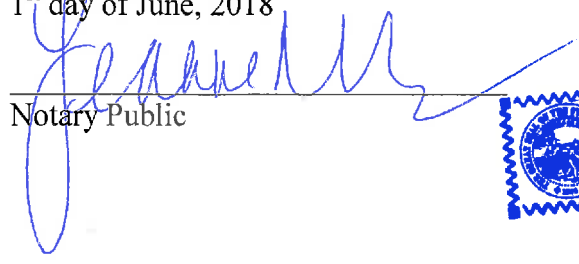
Talbot J. Wiczorek  
Gunderson, Palmer, Nelson & Ashmore  
P.O. Box 8045  
Rapid City, SD 57709-8045  
[tjw@gpna.com](mailto:tjw@gpna.com)

Stephen W. Chriss  
Wal-Mart Legal Department  
2001 SE 10<sup>th</sup> Street  
Bentonville, AR 72715-5560  
Stephen.chriss@wal-mart.com



Richard Savelkoul

Subscribed and sworn to before me this  
1<sup>st</sup> day of June, 2018



Notary Public

