



**SMITH PORSBORG**  
Schweigert Armstrong Moldenhauer & Smith

ATTORNEYS AT LAW  
February 20, 2019

Public Service Commission  
Attention: Steve Kahl  
600 East Boulevard Avenue, Dept. 480  
Bismarck, ND 58505-0480

In re: Northern States Power Company  
Advanced Prudence – 151.2 MW Dakota Range III  
PU-18-430

Dear Mr. Kahl:

Enclosed for filing is the Advocacy Staff's Response to Application for Trade Secret Protection with regard to the above-referenced case.

If you have any questions, please feel free to give me a call.

Respectfully,

  
MITCHELL D. ARMSTRONG  
Special Assistant Attorney General for  
Public Service Commission Advocacy Staff

- Sheldon A. Smith\*
- Scott K. Porsborg\*\*\*
- Suzanne M. Schweigert\*
- Mitchell D. Armstrong\*\*
- Stacy M. Moldenhauer\*\*
- David J. Smith\*\*
- Brian D. Schmidt\*
- Tyler J. Malm\*
- Sarah E. Wall\*\*^
- Austin T. Lafferty\*
- Ian J. Arendt\*

amh  
enclosure  
cc: ALJ Ward (w/ enc.)  
Zachary Pelham (w/ enc.)  
Zeviel Simpser (w/ enc.)

PSC.2

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**STATE OF NORTH DAKOTA**  
**PUBLIC SERVICE COMMISSION**


**Public Service Commission  
Northern States Power Company  
Advanced Prudence – 151.2 MW Dakota Range III  
Siting Application**

**Case No. PU-18-430**

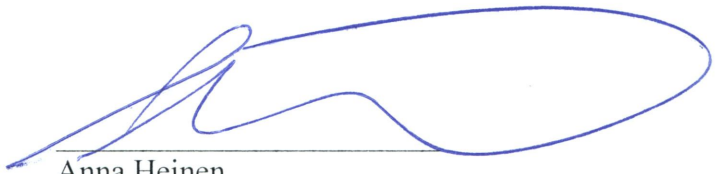
**ADVOCACY STAFF'S RESPONSE TO APPLICATION FOR  
TRADE SECRET PROTECTION**

The following is Staff's response to the *Application for Trade Secret Protection* dated December 27, 2018. Northern States Power Company ("NSP") seeks protection for certain information associated with its application. Advocacy Staff does not object to the majority of information designated as trade secret because the information appears to have independent economic value (actual or potential) as explained in NSP's trade secret application, with one exception. Advocacy Staff asserts the information designated in Brian E. Shea's pre-filed direct testimony at page 9, lines 4-15 is not, or at least no longer is, trade secret. The information does not appear to derive independent economic value, and is an important piece of information for the public's knowledge with respect to the application and why prudence is being sought from the North Dakota PSC. Further, how and to what jurisdictions the project costs and benefits would be allocated is not trade secret information, but is information of public interest and routinely disclosed in utility filings. Therefore, Advocacy Staff objects to trade secret protection for the Shea testimony on page 9, lines 4-15, but does not object to the remainder of the application for trade secret protection.

Dated this 20th day of February, 2019.

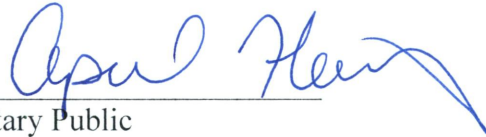
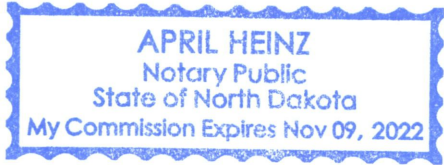
By:   
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Anna Heinen

Subscribed and sworn before me this 20th day of February, 2019.



Notary Public  
Burleigh County, North Dakota