

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

**Otter Tail Power Company**  
**69 kV Transmission Segment & Three Substations**  
**Public Convenience & Necessity**

**Case No. PU-19-298**

**STAFF RESPONSE TO APPLICATION FOR PROTECTION OF INFORMATION**

August 20, 2019, Otter Tail Power Company filed an application for a protective order under North Dakota Administrative Code Section 69-02-09-01, and 69-025-09-04 for protecting against public disclosure protected information as defined by North Dakota Century Code Section 47-25.1-01(4), and 44-04-18.4.

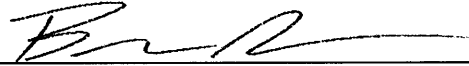
The information for which the Company seeks protection includes electric one line diagrams which contains details on the bulk electric System and information on Critical Energy/Electrical Infrastructure Information.

North Dakota Administrative Code Section 69-02-09-03 requires that the Commission staff examine the information and application and make a recommendation to the Commission.

Staff believes that the application satisfies the requirements of the North Dakota Century Code for protection of information, and that the financial statements derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; is the subject of efforts that are reasonable under the circumstances to maintain its secrecy; and constitutes information pertaining to Critical Energy/Electric Infrastructure Information.

For reasons set forth above, Staff recommends that the Commission grant the application of the Company to protect certain information filed in this case.

Dated this 4th day of November, 2019.



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Brian Johnson  
Staff Attorney  
North Dakota Public Service Commission