

December 10, 2019

Executive Secretary
North Dakota Public Service Commission
State Capitol Building
Bismarck, ND 58505

Re: Cost of Gas Adjustment
(COG) Rate 88 and Rate 99
Case No. PU-20-008

Enclosed please find Montana-Dakota Utilities Co.'s Application for Trade Secret Protection to renew the request of confidential treatment of portions of the cost of gas calculation for calendar year 2020. Montana-Dakota has been providing this information in accordance with the most recent Order on Trade Secret Protection issued on October 2, 2019 in Case No. PU-19-008.

Please acknowledge receipt by stamping or initialing the duplicate copy of this letter attached hereto and returning the same in the enclosed self-addressed stamped envelope.

If you have any questions regarding this filing, please contact me at (701) 222-7856 or tamie.aberle@mdu.com

Sincerely,



Tamie A. Aberle
Director of Regulatory Affairs

Attachment
cc: K. Liepitz

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

In the Matter of MONTANA-DAKOTA)
UTILITIES CO., a Subsidiary of MDU)
Resources Group, Inc. Cost of Gas) Case No. PU-20-008
Updates Filed Pursuant to Rate 88)
)

APPLICATION FOR TRADE SECRET PROTECTION

Pursuant to N.D. Admin. Code § 69-02-09-01, Montana-Dakota Utilities Co., a Subsidiary of MDU Resources Group In., (Montana-Dakota) respectfully requests that the Commission issue a trade secret protective order under N.D. Admin. Code § 69-02-09-04 and N.D. Cent. Code §44-04-18.4(1 & 2) . The purpose of the requested protective order is to protect against public disclosure of trade secrets as defined by N.D. Cent. Code § 47-25.1-01(4) .

I.

The information for which the Company seeks trade secret protection is a portion of the Cost of Gas filing that contains confidential information on gas commodity pricing.

The following components are identified as confidential:

- Demand charge monthly delivery quantities excluding FT-1 MDDQ
- Demand charge amounts excluding FT-1 MDDQ
- Commodity charge monthly delivery quantities excluding the Gas Commodity – System quantity
- Commodity charge amounts
- Fuel – Transp. WBI rate
- Fuel – Transp NB rate
- Fuel – Transp. NW rate
- Fuel – Storage rate
- Gas Commodity - System rate

The information contains confidential pricing information relating to Montana-Dakota's natural gas purchase practices in a competitive environment and should not

be disclosed or released to the public and that, if the information were released, competitors would be able to benefit from the information to the detriment of the Company and its customers. The confidential information is considered trade secret, as it provides an economic advantage in Montana-Dakota's gas contract negotiations. The Cost of Gas is subject to change each month. Montana-Dakota requests an Order protecting the information provided in its Cost of Gas submittals in 2020.

II.

The above-referenced information is not publicly available and is confidential business information prepared specifically for Montana-Dakota. Vendors and competitors would have an opportunity to obtain economic value from disclosure or use of the information, to the detriment of Montana-Dakota. If publicly available, vendors could use the information to their advantage in contract negotiations, while competitors could use the information to leverage their positions in the marketplace to Montana-Dakota'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 TRADE SECRET – PRIVATE. Upon entry of an Order in this case, Montana-Dakota will submit this information as TRADE SECRET – PRIVATE in subsequent Cost of Gas Adjustment filings submitted to the North Dakota Public Service Commission.

Dated this 10th day of December 2019.

MONTANA-DAKOTA UTILITIES CO.
A Subsidiary of MDU Resources Group, Inc.

By: 

Tamie A. Aberle
Director of Regulatory Affairs

