



# SMITH PORSBORG

Schweigert Armstrong Moldenhauer & Smith

ATTORNEYS AT LAW

April 7, 2021



**VIA EMAIL AND U.S. MAIL**

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

In re: Northern States Power Company  
2021 Electric Rate Increase  
PU-20-441  
OAH File NO.: 20200422

Dear Mr. Kahl:

Enclosed for filing is the *Advocacy Staff's Response to NSP's First Supplemental Application for Trade Secret Protection and Motion for Special Proceeding* with regard to the above-referenced case.

Thank you for your attention to this matter.

Respectfully,

MITCHELL D. ARMSTRONG  
Special Assistant Attorney General for PSC  
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\*
- Austin T. Lafferty\*
- Jon C. Lengowski\*

amh  
enclosure

- cc: Zeviel Simpser (w/ enc.)
- Julie A. Clark (w/ enc.)
- Dave A. Tschider (w/ enc.)
- John B. Coffman (w/ enc.)
- ALJ Hope Hogan (w/ enc.)
- John Schuh (w/ enc.)
- Matthew Harris (w/ enc.)

**84** **PU-20-441** Filed: 4/8/2021 Pages: 4  
**Response to NSP's First Supplemental Application for Trade Secret Protection and Motion**

PSC.2

Public Service Commission Advocacy Staff  
Mitch Armstrong, Advocacy Staff Counsel

- \* Licensed in North Dakota
- \*\* Licensed in Minnesota
- \*\*\* Licensed in South Dakota
- \* Board Certified Civil Trial Specialist by National Board of Trial Advocacy

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

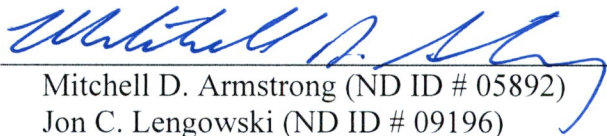
**Northern States Power Company  
2021 Electric Rate Increase  
Application**

**Case No. PU-20-441  
OAH No. 20200422**

**ADVOCACY STAFF'S RESPONSE TO NSP'S FIRST SUPPLEMENTAL  
APPLICATION FOR TRADE SECRET PROTECTION AND MOTION FOR  
SPECIAL PROCEEDING**

[¶1] On April 5, 2021, Northern States Power Company (NSP) requested a supplemental protective order to protect from public disclosure trade secret, proprietary, and commercial information that has been or will be provided by the Company in response to data requests. Advocacy Staff has received information in discovery that has been designated trade secret by NSP. Advocacy Staff believes the information designated as trade secret during discovery qualifies for protection. In addition, Advocacy Staff believes the type of information requested to be protected by NSP's motion qualifies for protection. Advocacy Staff does not oppose NSP's motion and requests it be granted.

Dated this 7th day of April, 2021.

By:   
Mitchell D. Armstrong (ND ID # 05892)  
Jon C. Lengowski (ND ID # 09196)  
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STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION

Northern States Power Company  
2021 Electric Rate Increase  
Application

Case No. PU-20-441  
OAH No. 20200422

AFFIDAVIT OF SERVICE

STATE OF NORTH DAKOTA     )  
  )ss  
COUNTY OF BURLEIGH     )

Anna Heinen states under oath as follows:

1. I swear and affirm upon penalty of perjury that the statements made in this affidavit are true and correct.

2. I am of legal age and on the 7th day of April, 2021, I served the following document:

- **Advocacy Staff's Response to NSP's First Supplemental Application for Trade Secret Protection and Motion for Special Proceeding;**

upon the following, by mailing and e-mailing a true and correct copy to the following:

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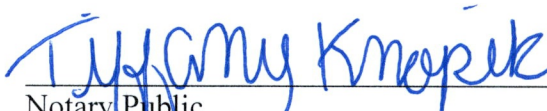
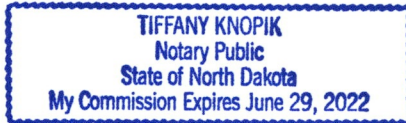
and depositing the same, with postage prepaid, in the United States mail at Bismarck, North Dakota.



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Anna Heinen

Subscribed and sworn before me this 7th day of April, 2021.



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Notary Public  
Burleigh County, North Dakota