


Mr. Kahl
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An electronic copy of this filing is being sent to you at ndpsc@nd.gov. Please feel free to contact me at cstephenson@otpc.com or 218-739-8956 with any questions.

Sincerely,


Cary Stephenson
Associate General Counsel

sjw
Enclosures
By electronic filing

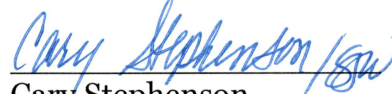
The above-referenced information is not publicly available, is confidential business information, and was prepared specifically by Otter Tail with data inputs unique to Otter Tail. The confidentiality of this information has been maintained by Otter Tail. Otter Tail's Commission-approved tariff under which this information is being filed specifically states the information will be provided only to Commission and Commission Staff. The information, therefore, is not readily ascertainable by proper means by other persons.

The disclosure of this information could provide Otter Tail competitors valuable competitive information, specifically with regard to Otter Tail marginal pricing and calculations concerning net benefits. Vendors, competitors and prospective EDR eligible customers would have an opportunity to obtain economic value from disclosure or use of the information to the detriment of Otter Tail and the customers we serve.³ Therefore it is appropriate to protect this information from public disclosure.

Dated: August 15, 2022

Respectfully submitted,

OTTER TAIL POWER COMPANY



Cary Stephenson
Associate General Counsel
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³ Competitors include other entities seeking to attract large agricultural and industrial loads, including electric cooperatives and other investor-owned utilities. This includes regional and national electric and gas utilities. Competitors can also include third party developers seeking to develop alternative generation resources. Moreover, access to OTP marginal pricing and inputs/outputs of the EDPM could be used by parties seeking to negotiate purchase power arrangements with OTP to the detriment of Otter Tail customers. The same is true of potential EDR customers, who would be better positioned to secure favorable terms to the detriment of Otter Tail's customers. Vendors could also use this information to target their procurement efforts with respect to the infrastructure investments necessary to serve this particular EDR customer.