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January 25, 2023

Mr. Steve Kahl
Director of Administration/Executive Secretary
North Dakota Public Service Commission
State Capitol
600 East Boulevard, Dept. 408
Bismarck, ND 58505-0408

**RE: In the Matter of Otter Tail Power Company's Request for Approval of its 2023
Renewable Resource Cost Recovery Adjustment Factor
Case No. PU-22-429**

Dear Mr. Kahl:

Enclosed please find Otter Tail Power's Application for Trade Secret Protection in the above-referenced matter.

The protected information described in the Application is being sent in Excel format via email directly to Mr. Victor Schock for review.

Please contact me at (218) 739-8313 or eketelsen@otpc.com if you have any questions regarding this filing.

Sincerely,

/S/ EMILY KETELSEN
Emily Ketelsen
Rates Analyst
Regulatory Administration

sjw
Enclosures
By electronic filing and U.S. mail

STATE OF NORTH DAKOTA

PUBLIC SERVICE COMMISSION

**In the Matter of Otter Tail Power
Company's Request for Approval of its
2023 Renewable Resource Cost Recovery
Adjustment Factor**

Case No. PU-22-429

APPLICATION FOR TRADE SECRET PROTECTION

Pursuant to N.D. Admin. Code §§ 69-02-09-01 and 69-02-09-04, Otter Tail Power Company (Otter Tail) respectfully requests that the Commission issue a trade secret protective order in the above-referenced case. The purpose of the requested protective order is to protect against public disclosure of trade secret or proprietary information, as defined by N.D. Cent. Code §§ 47-25.1-01(4) and 44-04-18.4.

The specific information for which Otter Tail seeks trade secret protection is the tracker model used to calculate the Renewable Resource Cost Recovery Adjustment Factor, which is provided to North Dakota staff to aid in the analysis of Otter Tail's Application. The above-referenced model is not publicly available, is a proprietary internally developed business model, and was developed specifically by Otter Tail with calculations unique to Otter Tail. The information is not readily ascertainable by proper means by other persons. If this information were made public, it could provide vendors and competitors a competitive advantage to the detriment of Otter Tail Customers.

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 PROTECTED INFORMATION – PRIVATE.

In addition, the Company requests that the trade secret protective order be broad enough to cover all additional information exchanged in the course of this proceeding and qualifying for trade secret protection.

Respectfully submitted this 25th day of January, 2023.

OTTER TAIL POWER COMPANY

By /s/ Cary Stephenson

Cary Stephenson

Associate General Counsel

Otter Tail Power Company

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