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April 12, 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 Fuel Clause  
Adjustment Waiver Approval  
Case No. PU-23-81**

Dear Mr. Kahl:

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

The protected information included in the staff memo on the 2022/2023 Big Stone Plant outage was provided directly to Mr. Christopher Hanson for review and incorporation into the staff memo.

Please contact me at (218) 739-8279 or [stommerdahl@otpc.com](mailto:stommerdahl@otpc.com) if you have any questions regarding this filing.

Sincerely,

*/S/ STUART TOMMERDAHL*  
Stuart Tommerdahl  
Manager, Regulatory Economics  
Regulatory Economics

kaw  
Enclosures  
By electronic filing and U.S. mail

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

**In the Matter of Otter Tail Power Company's  
Fuel Clause Adjustment Waiver Approval**

**Case No. PU-23-81**

**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.

Otter Tail seeks trade secret protection related to operating costs of the Big Stone Plant and other data that could derive those operating costs for Big Stone Plant, as referenced in the North Dakota Public Service Commission staff's memo. OTP has taken reasonable efforts to maintain the secrecy of the information marked as PROTECTED DATA, which derives 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 (the "Protected Data").

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.

Dated: April 12, 2023

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

By: /s/ CARY STEPHENSON

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Associate General Counsel  
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