

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)



September 23 , 2024

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 Application for
Approval of the Annual Rate Update to Rate Schedule, Section 13.05,
Transmission Cost Recovery Rider
Case No. PU-24-336
Application for Trade Secret Protection**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail) hereby submits to the North Dakota Public Service Commission (Commission) an Application for Trade Secret Protection in the above-referenced matter.

The protected information described in the Application is being sent in Excel format via State of North Dakota Secure File Transfer System to Mr. Adam Renfandt for review.

Copies have been sent to you via USPS.

If you have any questions regarding this filing, please contact me at 218-739-8406 or jsillerud@otpc.com.

Sincerely,

/s/ JORDAN M. SILLERUD
Jordan M. Sillerud
Rates Analyst
Regulatory Economics

vjm
Enclosures
By electronic filing and U.S. mail

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Application for Trade Secret Protection
Otter Tail Power Company
Jordan Sillerud, Rates Analyst

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**In the Matter of Otter Tail Power Company's
Application for Approval of the Annual Rate
Update to Rate Schedule, Section 13.05,
Transmission Cost Recovery Rider**

Case No. PU-24-336

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 for the tracker model used to calculate the Transmission Cost Recovery Rider rate, which is provided to North Dakota staff to aid in the analysis of Otter Tail's Application. Otter Tail 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, however, because the tracker is a live excel model, rather than providing a paper cop, Otter Tail will be providing one live copy to the Commission's Staff via the State of North Dakota's Secure File Transfer System.

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: September 23, 2024

Respectfully submitted,

OTTER TAIL POWER COMPANY

/s/ LAUREN D. DONOFRIO

Lauren D. Donofrio

Senior Associate General Counsel - Regulatory

Otter Tail Power Company

215 South Cascade Street

P.O. Box 496

Fergus Falls, MN 56538-0496

Phone (218) 739-8774