

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



August 20, 2025

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 the Annual Rate Update to Rate Schedule, Section 13.11, Metering & Distribution Technology Cost Recovery Rider
Case No. PU-25-232
Application for Trade Secret**

Dear Mr. Kahl:

Otter Tail Power Company (Otter Tail Power) 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. Christopher C. Hanson for review.

Copies have been sent to you via USPS.

Please contact me at (218) 739-8444 or dhaugen@otpc.com if you have any questions regarding this filing.

Sincerely,

/S/ DEREK HAUGEN
Derek Haugen
Rates Analyst
Regulatory Economics

amn
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 the Annual Rate
Update to Rate Schedule, Section 13.11,
Metering & Distribution Technology Cost
Recovery Rider**

Case No. PU-25-232

APPLICATION FOR TRADE SECRET PROTECTION

Pursuant to N.D. Admin. Code Chapter 69-02-09, Otter Tail Power Company (Otter Tail Power) 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 NDCC §§ 47-25.1-01(4) and 44-04-18.4.

Otter Tail Power seeks trade secret protection for the live tracker, provided separately in an Excel spreadsheet, for the purpose of protecting the formulas and models set forth in the live spreadsheet, which are proprietary to Otter Tail Power. To be clear, the revenue and financial data set forth in the live tracker is public information and is provided in Attachments 1-9.

The formulas and models in the live tracker are not publicly available, are confidential and proprietary business information, and were prepared specifically for Otter Tail Power with data inputs unique to the Company. The confidentiality of this information has been maintained by Otter Tail Power. The information, therefore, is not readily ascertainable by proper means by other persons. Disclosure of the propriety formulas and models would potentially result in the loss of valuable intellectual property, to the benefit of third parties including other electric service providers, to the ultimate detriment of Otter Tail Power and its customers.

In accordance with N.D. Admin. Code § 69-02-09-02, and Commission staff's request, a live copy of the Excel file containing trade secret material will be uploaded to the secure portal using a link provided by staff and will be marked as **NOT PUBLIC**.

Dated: August 20, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By /s/ CARY STEPHENSON
Cary Stephenson
Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8200
cstephenson@otpc.com