

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



September 18, 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 Application for
Approval of the Annual Rate Update to Rate Schedule, Section 13.05,
Transmission Cost Recovery Rider
Case No. PU-25-252
Application for Trade Secret Protection**

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 email directly to the Commission Staff Analyst assigned to the case for their review.

An original and 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

2 PU-25-252 Filed 09/18/2025 Pages: 2
Application for Trade Secret Protection

Otter Tail Power Company
Jordan M. 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-25-252

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 proprietary live 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 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 18, 2025

Respectfully submitted,

OTTER TAIL POWER COMPANY

By: /s/ LAUREN D. DONOFRIO

Lauren D. Donofrio
Senior Associate General Counsel
Otter Tail Power Company
215 S. Cascade Street
Fergus Falls, MN 56538-0496
(218) 739-8874

Ldonofrio@otpc.com