

**STATE OF SOUTH DAKOTA
BEFORE THE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF OTTER TAIL
POWER COMPANY'S SUBMITTAL OF
ITS 2022-2036 RESOURCE PLAN

Docket No. EL21-

REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Otter Tail Power Company (Otter Tail) requests the South Dakota Public Utilities Commission (Commission) to approve confidential treatment for the below-identified information pursuant to Administrative Rules of South Dakota (ARS") § 20:10:01:41.

1. Otter Tail requests confidential protection and treatment of the confidential portions of its 2017-2031 Resource Plan. The information is marked "PROTECTED."

2. The document must be protected for the life of this docket. When the docket is closed, all protected information must be returned to Otter Tail.

3. Please refer all inquiries regarding this filing to:

Nathan Jensen
Manager Resource Planning
Otter Tail Power Company
215 South Cascade Street
P.O. Box 496
Fergus Falls, MN 56538-0496
Phone (218) 739-8989

4. The claim for protection is based on ARSD § 20:10:01:39 (4) and SDCL § 37-29-1 (4). The information contained within the confidential portions of this report meets the definition of "trade secret" under the SDCL § 37-29-1(4), the South Dakota Uniform Trade Secret Act, which defines the term as information that "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, and... is the subject of efforts that are reasonable under the circumstances to maintain its secrecy."

5. The confidential portions this filing contain (1) proprietary energy and capacity forecast data and associated confidential models, methodologies, and modeling assumptions (as designated in Appendices B, F) and (2) confidential estimates for capital and operating costs of an anticipated project (as designated in the Resource Plan), and (3) confidential historical and projected energy usage information of certain large customers (as designated in Appendix B)

6. Otter Tail believes that disclosure of the information would provide a competitive advantage to vendors and bidders seeking to do business with Otter Tail, as well as to Otter Tail's competitors, affecting the competitive procurement of electric energy and electric generation resources to the detriment of Otter Tail's South Dakota customers. Moreover Otter Tail also has contractual and legal obligations to third parties vendors to maintain the confidentiality of certain information noted above. With respect to customer energy usage data, Otter Tail has obligations under South Dakota law and Otter Tail's South Dakota tariffs to maintain the confidentiality of such information. Accordingly, Otter Tail respectfully requests that the Commission authorize confidential protection and treatment of this information.

The information for which confidential treatment is requested has been marked "PROTECTED" and is being transmitted electronically as a separate document.

Date: September 1, 2021

Respectfully submitted,
OTTER TAIL POWER COMPANY

/s/ CARY STEPHENSON
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