

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

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In the Matter of the Complaint of Valley  
Queen Cheese Factory, Inc., Against  
Otter Tail Power Company

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Docket No. EL25-026

**REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION**

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

1. Otter Tail Power requests confidential protection and treatment of the confidential portions of the following attachments:

Attachment 1 to DR SD-PUC 1.01  
Attachment 1 to DR SD-PUC 1.02  
Attachment 2 to DR SD-PUC 1.02  
Attachment 1 to DR SD-PUC 1.03  
Attachment 2 to DR SD-PUC 1.03

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 Power.
3. Please refer to all inquiries regarding this filing to:

Cary Stephenson  
Associate General Counsel  
Otter Tail Power Company  
215 South Cascade Street  
P.O. Box 496  
Fergus Falls, MN 56538-0496  
Phone (218) 739-8956  
[cstephenson@otpc.com](mailto:cstephenson@otpc.com)

4. The claim for protection for **Attachment 1 to DR SD-PUC 1.01** is based on ARSD 20:10:01:39 (4)(5)(6), and Section 1.09 of the Company's Rules and Regulations. These materials contain billing information specific to the

Valley Queen Cheese Factory, Inc. (Customer). The Company's request is to protect this information from disclosure to the public, not the Customer.

5. The claim for protection based on **Attachment 1 to DR SD-PUC 1.02** is ARSD 20:10:01:39 (4)(5)(6) and Section 1.09 of the Company's Rules and Regulations. These materials include billing information specific to the Customer. The Company's request is to protect this information from disclosure to the public, not the Customer.
6. The claim for protection for **Attachment 2 to DR SD-PUC 1.02** is based on SDCL 1-27-28(5), SDCL 37-29-1(4) and SDCL 1-27-28(4). Specifically, Attachment 2 to DR SD-PUC-01.02 includes confidential trade secret, proprietary information concerning the methodology and design of the Company Real Time Pricing tariff, which (i) 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; (ii) is subject to efforts by the Company that are reasonable under the circumstances to maintain its secrecy AND/OR (iii) is information on pricing, costs, revenue, taxes, market share, customers, and personnel held OTP and used for OTP's business purposes. Please note that the Company provided the Customer with this information in January 2024 subject to a non-disclosure agreement and has no objection to the Customer accessing this Attachment.
7. The claim for confidential treatment for **Attachments 1 and 2 to DR SD-PUC 1.03** is based on ARSD 20:10:01:39 (4)(5)(6) and SDCL 1-27-28(4). This is day ahead pricing information developed by the Company and made available only to customers taking service under the Company's Real Time Pricing tariff. The Company's request is to protect this information from disclosure to the public, not the Customer.
8. The information for which confidential treatment is requested has been marked "CONFIDENTIAL – CONTAINS TRADE SECRET DATA" and is being transmitted electronically as a separate document.

9. Based on the foregoing, Otter Tail Power respectfully requests that the Commission authorize confidential protection and treatment of this information

Date: September 12, 2025

Respectfully submitted,

**OTTER TAIL POWER COMPANY**

/s/ CARY STEPHENSON

Cary Stephenson

Associate General Counsel

Otter Tail Power Company

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