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October 24, 2019

Mr. Daniel P. Wolf  
Executive Secretary  
Minnesota Public Utilities Commission  
121 7th Place East, Suite 350  
St. Paul, MN 55101-1247

**RE: 2019 Cogeneration and Small Power Production  
Docket No. E999/PR-19-9  
Reply Comments**

Dear Mr. Wolf:

Otter Tail Power Company (Otter Tail or Company) provides these Reply Comments in response to the “Notice of Extended Supplemental Comment Period” issued by the Minnesota Public Utilities Commission (Commission) on September 30, 2019. Initial comments were submitted on September 30, 2019 by the Minnesota Department of Commerce, Division of Energy Resources (Department), and on October 14, 2019 by Otter Tail, Minnesota Power, Xcel Energy, and the Environmental Law & Policy Center and Institute for Local Self-Reliance.<sup>1</sup>

### **INTRODUCTION**

Otter Tail’s Reply Comments primarily address the Joint Commenters’ initial comments and Otter Tail reiterates the public interest benefits and customer protection that accompany not publicly providing the material designated as Trade Secret or other Protected Data (Protected Data) in the September 10, 2019 utility filings. In sum, the Joint Commenters have not provided a legal or policy basis supporting public access to protected information.

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<sup>1</sup> For purposes of these Reply Comments, Otter Tail collectively refers to the Environmental Law and Policy Center (ELPC) and Institute for Local Self Reliance (ILSR) as the Joint Commenters.

## **OTTER TAIL REPLY COMMENTS**

### **1. Public Disclosure of the Types of Information Joint Commenters Seek to Release Can Result in Harmful Impacts to Customer and Third-Party Interests**

Otter Tail's Protected Data implicates, among other concerns, forward looking pricing that could influence bids that Otter Tail (and other public utilities) receive for future RFPs. As Otter Tail has noted in its comments before in this proceeding, that is an especially critical point when a utility is seeking new capacity. Simply put, a least cost or cost-effective solution to a utility acquiring new capacity or meeting the energy and capacity needs to serve its customers demands there be a level playing field. The Joint Commenters' position – essentially that there be no such thing as protected or trade secret data in the PURPA context – is not required by PURPA and goes against FERC's position and the historic recognition of the benefits in protecting such information from public disclosure afforded by the current approach Minnesota and this Commission (as well as the commission's in Otter Tail's other two states where it operates)<sup>2</sup> has taken.

Public disclosure of critical protected pricing data would not be in the public interest where it allows, for instance, bidders in a utility RFP or other energy or capacity auctions to set an artificial floor, or where traditionally protected operating characteristics of new and proposed generation can inform potential bidders on how to bid on, or perhaps "game," future generation decisions. In major decisions where developers are involved, the consequences of an unlevel bidding process would not just be short-term, as building generation capacity or longer-term power purchase agreements could in effect lock-in those inequities for years or even decades. This could result in increased costs to the utilities' ratepayers, who ultimately pay for (prudently incurred) generation decisions through rates.

Otter Tail would also again note a secondary but practical consideration that third parties could also be harmed by the public release of the information the Joint Commenters seek to release with minimal-to-no restrictions. Otter Tail and other utilities in this proceeding have noted that certain forward-looking data is obtained through subscription services or involve

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<sup>2</sup> Otter Tail again notes that it treats the information it has designated as non-public in this docket in the same fashion in its other jurisdictions of South Dakota and North Dakota, which maintain similar trade secret laws. In no instance have the Commissions in these jurisdictions concluded that avoided cost information designated as trade secret is available for public inspection.

proprietary models from an independent third-party, and that some of the specific operational information on third party plants (those not owned directly by Minnesota utilities) may have their own independent proprietary and competitive interests in keeping the information non-public. In many instances, that third-party information is Protected Data that Otter Tail either outright cannot publicly release or cannot release without specific protections in place. Such third-party vendor information is included as part of Otter Tail's Trade Secret or Protected Data in its filings with the Commission in this proceeding. Therefore, public disclosure not only could result in higher costs to our customers, the interest of third parties whose information is at issue would also be harmed or otherwise could result in having that party's proprietary information out there in public domain *gratis*.

Otter Tail also continues to question the Joint Commenters' overall rationale for the public disclosure of trade secret information. As it noted in its September 30, 2019 comments, Otter Tail's filing produces published avoided cost rates, which presumably form the key metric for parties considering cogeneration and small power production opportunities. The Commission, the Office of Attorney General, and the Department all provide review and oversight of Otter Tail's methodology and calculations. Issues or concerns regarding Otter Tail's Integrated Resource Plan can be addressed in Otter Tail's Integrated Resource Plan docket.

## **2. The Minnesota Government Data Practices Act Necessitates Protections Against Full Public Disclosure of Properly Designated Protected Data**

The Joint Commenters assert that Minnesota law precludes utilities from protecting any information in their Annual Cogeneration and Small Power Production Reports from public disclosure. This has not been the case in Minnesota to date and there isn't a sound reason for that result now. As Otter Tail has noted already, the Minnesota Government Data Practices Act (Minn. Stat. § 13.01, *et seq.*) protects this information from public disclosure. This state statute would prevail over a state rule – such as Minn. R. 7835.1200 – in that a statute is to prevail over a conflicting state rule as a matter of law. The Minnesota Government Data Practices Act protects Otter Tail's estimated marginal energy cost and estimated capacity cost information

from disclosure because it constitutes “trade secret” information.<sup>3</sup> The Minnesota Government Data Practices Act (Minn. Stat. § 13.37, subd 2) further provides that trade secret information is “nonpublic” data, requiring either consent of the affected organization or the passage of ten years from collection, “unless the responsible authority for the originating or custodial entity for the data reasonably determines that, if the data were made available to the public or to the data subject, the harm to the public or to a data subject would outweigh the benefit to the public or to the data subject.” (Minn. Stat. § 13.03, subd. 8.) Otter Tail has already laid out the reasoning and its legal position on regulations and rules versus statutes, and on conflict preemption, in its earlier February 22, 2019 and October 14, 2019 filings.

### **3. The Commission Should Not Require Biannual Filings Under 18 CFR § 292.302(b)**

On the Joint Commenters advocating a requirement for utility bi-annual filing under 18 CFR § 292.302(b), those organizations have not provided any clear or tangible public interest benefits of doing so. Nor would such a requirement be helpful or beneficial, especially given that the current state statutes and rules allow for the calculation of avoided costs while providing a proper, fair and proven process for so doing.

### **4. Use of a Standardized Non-Disclosure Agreement (NDA)**

On the use of non-disclosure agreements (NDAs), Otter Tail again reiterates that an NDA can provide the right work-around and strike the right balance in some situations, but that there still needs to be justification and as such, using an NDA for anyone who requests that route still runs into problems when there is competitively-sensitive information made widely available to, say, the developer community or their trade groups. Otter Tail again would note that, given the harm to the utility, its customers, and third-parties (especially their proprietary information), access to the Protected Data needs to be restricted to those who have a valid purpose and under an NDA that is appropriate for the circumstances. That need for customer and third-party

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<sup>3</sup> Minn. Stat. § 13.37, subd. 1(b) defines “trade secret information” as data that was supplied to the government: (1) by an affected organization; (2) that took reasonable efforts to maintain its secrecy; and (3) which derives actual or potential independent economic value from it 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.

protections in individual situations weighs against having a standard “Minnesota Commission” NDA uniform throughout the state, unless it could also recognize the situations where third-party information would mandate a separate, tailored NDA or where any such “uniform” NDA would not suffice in keeping the information which can harm customers from being used against the public interest. Otter Tail again notes, for example, the potential for negative public consequences in the situation where a critical capacity decision with 20-, 30- or even 40+-years of implications for customers’ rates and a utility’s prudent planning is subject to a non-level playing field, unfair advantage, or a distorted bidding process. It would not be appropriate to use non-disclosure agreement where there remains the risk of competitively sensitive information being disclosed to parties who may use the information to the detriment of Otter Tail and its customers.

While it is conceivable that a non-disclosure agreement could be drawn narrowly enough to avoid such risks much would depend on the particular facts. At a minimum, any move toward a more standardized NDA approach needs to allow for the flexibility to add or remove provisions and impose additional levels of protection as appropriate in a particular situation. And the process for requesting an NDA should be structured and include protections to help ensure that the information will not be mis-used.

## **CONCLUSION**

Otter Tail appreciates the opportunity to respond to the comment topics and other comments filed in this proceeding regarding its trade secret designations in Annual Cogeneration and Small Power Production reports. While Otter Tail understands that some parties seek out and would like increased access to data, both state and federal law – as well as the practices of FERC and this Commission – allow for the trade secret designation of portions of Annual Cogeneration and Small Power Production reports and that allowing for such designations serves the public interest. Further, Otter Tail disagrees any benefit would be provided by biannual filings. Otter Tail also again asserts that while NDAs can serve a purpose such as in connection with a bona fide specific project, a standardized NDA may often only partially mitigate or can fail to mitigate the risk that the disclosure of information for other purposes or parties, which could negatively impact ratepaying customers and third-party trade secret and proprietary interests.

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We are available to provide any additional information or respond to any questions you may have. Feel free to contact me at (218) 739-8722 or email me at [kdahl@otpc.com](mailto:kdahl@otpc.com).

Sincerely,

/s/ Kristian M. Dahl  
Kristian M. Dahl  
Associate General Counsel

cjh  
Enclosures  
By electronic filing  
cc: Service List

## CERTIFICATE OF SERVICE

**RE: In the Matter of the Annual Filing of Cogeneration and Small Power Production rates for Otter Tail Power Company  
Docket No. E999/PR-19-09**

I, Carly Haiby, hereby certify that I have this day served a copy of the following, or a summary thereof, on Daniel P. Wolf and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class Mail.

**Otter Tail Power Company  
Reply Comments**

Dated this 24<sup>th</sup> day of October, 2019

/s/ CARLY HAIBY

Carly Haiby, Regulatory Filings Coordinator  
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