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VIA ELECTRONIC FILING

December 5, 2007

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
Capital Building, 1st Floor
500 East Capital Avenue
Pierre, SD 57501-5070

RE: REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION
ACCOUNTING TREATMENT FOR NUCLEAR REFUELING OUTAGE COSTS

Dear Ms. Van Gerpen:

Pursuant to ARSD § 20:10:01:41, enclosed please find our Application for Confidential Treatment of Information seeking protection for Schedule B, *Forecast Outage Refueling Schedule*, and Schedule E, *Amortization of Reload O&M Costs*.

Accordingly, one copy of the confidential material is provided in the enclosed sealed envelope which has been labeled "CONFIDENTIAL-PRIVATE."

You may direct any questions regarding this filing to me at 605-339-8350 or Ms. Hertzler at (612) 215-4589.

Sincerely,

A handwritten signature in cursive script that reads 'J Wilcox'.

Jim Wilcox, Manager
Government & Regulatory Affairs
Northern States Power Company, a Minnesota corporation
operating in South Dakota

PUBLIC UTILITIES COMMISSION
THE STATE OF SOUTH DAKOTA

IN THE MATTER OF THE PETITION OF
NORTHERN STATES POWER COMPANY, A
MINNESOTA CORPORATION, FOR A FINDING
OF PREFERRED ACCOUNTING TREATMENT
FOR NUCLEAR REFUELING OUTAGE COSTS

REQUEST FOR CONFIDENTIAL TREATMENT OF INFORMATION

Pursuant to ARSD § 20:10:01:41, Northern States Power Company, a Minnesota corporation (“Xcel Energy”) operating in South Dakota, through its undersigned attorney Megan J. Hertzler, Assistant General Counsel, requests that the documents enclosed in the accompanying sealed envelope and appropriately marked, be afforded confidential treatment as provided for in ARSD §§ 20:10:01:40 and 20:10:01:43 through 44. In support of this request, Xcel Energy state as follows:

1. The specific information that we are seeking protection for is contained in Schedule B, *Forecast Outage Refueling Schedule* (“Schedule B”) and in Schedule E, *Amortization of Reload O&M Costs* (“Schedule E”), filed by Xcel Energy on December 4, 2007
2. The length of time for which confidentiality is being requested for the Agreement is ten years.

3. The name, address and telephone number of the person to be contacted regarding this request are:

Megan J. Hertzler
Assistant General Counsel
414 Nicollet Mall
Minneapolis, Minnesota 55401
Telephone: (612) 215-4589
Fax (612) 215-4544
email: megan.hertzler@xcelenergy.com

and

Jim Wilcox, Manager
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4. The South Dakota Public Utilities Commission (“Commission”) has adopted ARSD § 20:10:01:39, which mandates confidential treatment for information made confidential under any other provision of state or federal law.

5. A trade secret is broadly defined in SDCL § 37-29-1(4) 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.

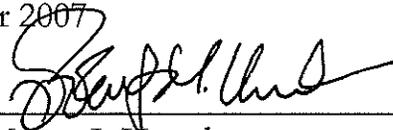
6. Schedules B and E identify the planned nuclear refueling outages for Xcel Energy’s three nuclear units by date and duration. It is necessary to obtain

replacement power during the time that these nuclear units are out of service. If the date of the outage, length of the outage, expected date for return to service or outage extensions became generally known, potential replacement power suppliers would have an advantage in negotiating with Xcel Energy for replacement power during the times that the nuclear units are out of service. It is in the best interest of our ratepayers for this information to be protected from public disclosure to allow us the ability to effectively negotiate. Consequently, the information in Schedules B and E meet the broad definition of trade secret found in SDCL § 37-29-1(4), because:

(a) they derive independent economic value, actual or potential, from being not generally known to, nor readily ascertainable by proper means by, other persons who can obtain economic value from its disclosure or use; and (b) Xcel Energy has taken reasonable efforts under the circumstances to maintain the data's secrecy.

Based on the foregoing Xcel Energy respectfully request that confidential treatment be granted to Schedules B and E.

Respectfully submitted this 5th day of December 2007

By 
Megan J. Hertzler
Assistant General Counsel

Attorney on Behalf of Northern States
Power Company, a Minnesota corporation
operating in South Dakota.