



500 West Russell Street
Sioux Falls, South Dakota 57101

April 27, 2012

VIA ELECTRONIC FILING

Ms. Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501

RE: APPLICATION OF NORTHERN STATES POWER COMPANY, A MINNESOTA CORPORATION, FOR AUTHORITY TO INCREASE RATES FOR ELECTRIC SERVICE IN SOUTH DAKOTA
DOCKET NO. EL11-023

Dear Ms. Van Gerpen:

Northern States Power Company, a Minnesota corporation operating in South Dakota, hereby submits the Rebuttal Testimonies and Schedules of Laura McCarten, James M. Coyne and James R. Alders in the above-entitled matter. Please note that the Rebuttal Testimony of James R. Alders and his attached Schedule 2 contain information designated as CONFIDENTIAL.

In accordance with ARSD §§ 20:10:01:39 through 42, Xcel Energy respectfully requests confidential treatment of certain information contained in this filing. In compliance with ARSD § 20:10:01:41, we have clearly marked each page containing confidential information as "CONFIDENTIAL" and submitted it as a separate document along with this filing.

Pursuant to ARSD § 20:10:01:41, we provide the following information in support of our request:

- (1) We request confidential treatment of the information identified as confidential in the Rebuttal Testimony of James R. Alders and the entire document provided as Schedule 2 to the Rebuttal Testimony of Mr. Alders.
- (2) We request these documents be treated as confidential forever.
- (3) If you have questions regarding this request please contact:

Kari L. Valley
Assistant General Counsel
Xcel Energy Services Inc.
414 Nicollet Mall
Minneapolis, MN 55401
(612) 215-4526

- (4) We request confidential treatment on the grounds that the material is proprietary and trade secret information, the disclosure of which would result in material damage to the company's financial or competitive position. The claim for confidential treatment is based on ARSD § 20:10:01:39 (4) and SDCL § 1-27-30. The information contained within the referenced documents meets the definition of "trade secret" under SDCL § 37-29-1(4)(1), the South Dakota Uniform Trade Secrets Act, which is defined 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." The information also meets the definition of "proprietary information" under SDCL § 1-27-28, which is defined as "information on pricing, costs, revenue, taxes, market share, customers, and personnel held by private entities and used for that private entity's business purposes."
- (5) The noted documents qualify for confidential treatment because they contain proprietary business information which the Company does not disclose to the public.

A copy of this Request for Confidential Treatment and Confidential documents will be electronically filed as separate documents and marked "CONFIDENTIAL." Should you have any questions regarding this filing or our request for confidential treatment of information, please contact Kari Valley at (612) 215-4526 or kari.l.valley@xcelenergy.com.

Sincerely,



JAMES C. WILCOX
MANAGER, GOVERNMENT AND REGULATORY AFFAIRS

Enclosures