



500 West Russell Street  
Sioux Falls, South Dakota 57101

June 4, 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. EL11-019

Dear Ms. Van Gerpen:

Northern States Power Company, a Minnesota corporation operating in South Dakota, hereby submits the Surrebuttal Testimonies and Schedules of James M. Coyne and James R. Alders in the above-entitled matter. Please note that the Schedule 1 attached to the Surrebuttal Testimony of James R. Alders contains 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 entire document provided as Schedule 1 to the Surrebuttal Testimony of Mr. Alders.
- (2) We request this document 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 document qualifies for confidential treatment because it contains proprietary business information which the Company does not disclose to the public.

A copy of this Request for Confidential Treatment and Confidential document 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](mailto:kari.l.valley@xcelenergy.com).

Sincerely,



JAMES C. WILCOX  
MANAGER, GOVERNMENT AND REGULATORY AFFAIRS

Enclosures