



PUBLIC

Jim Wilcox, Principal Manager  
500 West Russell Street  
P.O. Box 988  
Sioux Falls, SD 57101-0988  
Telephone (605) 339-8350 fax 612/573-9083  
internet - james.c.wilcox@xcelenergy.com

June 7, 2013

Ms. Patricia Van Gerpen, Executive Director  
South Dakota Public Utilities Commission  
State Capitol Building  
500 East Capitol Avenue  
Pierre, South Dakota 57501-5070

Re: RESPONSE TO DATA REQUEST 1  
2012 DSM STATUS REPORT AND 2014 DSM PROPOSED PLAN  
DOCKET NO. EL 13-017

Dear Ms. Van Gerpen:

Enclosed for filing is a Response by Northern States Power Company to the Commission's Data Request 1.

Pursuant to South Dakota Admin. R. 20:10:01:41, the Company provides the following support for our request to classify certain documentation as confidential trade secret data:

- A non-public confidential version is also being filed simultaneously to this public version.

Pursuant to S.D. Codified Laws Chapter 20:10:01:41, the Company submits the following justification for confidential treatment of this Response.

**(1) An identification of the document and the general subject matter of the materials or the portions of the document for which confidentiality is being requested;**

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 Response contains financial information that is not available to the general public.

**(2) The length of time for which confidentiality is being requested and a request for handling at the end of that time. This does not preclude a later request to extend the period of confidential treatment;**

The Company requests that the Response be recognized as confidential in perpetuity.

**(3) The name, address, and phone number of a person to be contacted regarding the confidentiality request;**

James C. Wilcox

Principal Manager  
Xcel Energy  
500 W. Russell Street  
P.O. Box 988  
Sioux Falls, South Dakota 57101  
(605) 339-8350

**(4) The statutory or common law grounds and any administrative rules under which confidentiality is requested. Failure to include all possible grounds for confidential treatment does not preclude the party from raising additional grounds in the future;**

In accordance with South Dakota Admin. R. 20:10:01:39 through 42, Xcel Energy respectfully requests confidential treatment of certain information contained in this filing. In compliance with South Dakota Admin. R. 20:10:01:41, we have clearly marked each page of the confidential version with the term "CONFIDENTIAL".

The claim for confidential treatment is based on South Dakota Admin. R. 20:10:01:39 (4) and S.D. Codified Laws Chapter 1-27-30. The information contained within the referenced documents meets the definition of "trade secret" under S.D. Codified Laws Chapter 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 S.D. Codified Laws Chapter 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 factual basis that qualifies the information for confidentiality under the authority cited.**

The South Dakota Public Utilities Commission mandated that the Company's rate of return on equity be kept confidential. The Commission made this determination in the Company's 2009 electric rate case and reiterated that desire in the recently concluded docket EL12-046.

If anyone has any questions, please call me at 605-339-8350.

Sincerely,



Jim Wilcox