



**PUBLIC VERSION
ENCLOSED**

5000 West Russell Street
P.O. Box 988
Sioux Falls, SD 57101-0988

November 29, 2016

—Via Electronic Filing—

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

RE: PETITION
2015 DSM STATUS REPORT AND PROPOSED 2017 DSM PLAN

Dear Ms. Van Gerpen:

Enclosed for filing is our updated Petition by Northern States Power Company requesting approval of our 2015 DSM Status Report, including a request for approval of cost recovery for the 2015 actual expenditures and incentive, as well as approval of our Proposed 2017 DSM Plan and proposed DSM Cost Adjustment Factor.

Enclosed we have provided the updated plan in both redline and complete versions for Commission approval. We have also included two additional attachments: (1) our response to Commission inquiry at the hearings held November 22, 2016, as Attachment E; and (2) the cost benefit documents for our 2017 portfolio as Attachment F.

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

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

(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 contains trade secret information, the disclosure of which would result in material damage to the Company's financial or competitive position. The petition 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 petition be recognized as confidential in perpetuity.

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

Eric Pauli
Community Relations Manager
Xcel Energy
500 W. Russell Street
P.O. Box 988
Sioux Falls, South Dakota 57101
(605) 339-8303

(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;

The Company requests confidential treatment because the information is both trade secret and proprietary. 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 "[d]erives 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

Ms. Van Gerpen
Page 3 of 3
November 29, 2016

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.

Consistent with the terms of the Settlement Stipulation approved by the Commission in the Company's 2012 electric rate case (docket EL12-046), the rate of return on equity is confidential.

For any questions regarding this filing, please call me at (605)339-8303 or email at eric.pauli@xcelenergy.com.

Sincerely,

A handwritten signature in black ink that reads "Eric Pauli". The signature is written in a cursive, slightly slanted style.

Eric Pauli
Community Relations Manager