



414 Nicollet Mall  
Minneapolis, MN 55401

August 8, 2017

—Via Electronic Filing—

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

RE: REBUTTAL TESTIMONY  
XCEL ENERGY'S PROPOSED FUEL CLAUSE RIDER  
DOCKET NO. EL16-037

Dear Ms. Van Gerpen:

Northern States Power Company, doing business as Xcel Energy, submits the Rebuttal Testimonies and Schedules of the following witnesses in the above-noted matter.

- Aakash H. Chandarana – *Policy*
- Philip Joseph Martin – *Resource Planning*

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 North Star Solar Purchased Power Agreement energy and capacity value figures and calculations identified as confidential in Figure 2 and Schedule 1 of Mr. Martin's testimony.
- (2) We request these documents be treated as confidential forever.

(3) If you have questions regarding this request, please contact:

Amanda J. Rome  
Lead Assistant General Counsel  
Xcel Energy Services Inc.  
414 Nicollet Mall, 401 8<sup>th</sup> Floor  
Minneapolis, MN 55401  
(612) 215-5331

- (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, along with Confidential documents, will be electronically filed as separate documents and marked "CONFIDENTIAL." If you have any questions regarding this filing or our request for confidential treatment of information, please contact Amanda Rome at (612) 215-5331 or [amanda.rome@xcelenergy.com](mailto:amanda.rome@xcelenergy.com).

Sincerely,

/s/

LAURA McCARTEN  
REGIONAL VICE PRESIDENT  
NSP-MINNESOTA

Enclosures