



500 West Russell St
Sioux Falls, SD 57104

March 26, 2020

**--Via Electronic Filing--
PUBLIC DOCUMENT
NOT PUBLIC DATA EXCISED**

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
Capitol Building, 1st Floor
500 E. Capitol Ave.
Pierre, SD 57501-5070

RE: REFUND CALCULATION
DOCKET NO. EL18-004

Dear Ms. Van Gerpen:

Northern States Power Company, doing business as Xcel Energy, submits the enclosed calculation of the refund due to South Dakota customers consistent with the Commission's Order dated March 23, 2020 in the above referenced docket. Attachment A provides the supporting calculations for the refund including interest applied at an annual rate of 7.22 percent based on the Company's authorized rate of return. The total amount to be refunded, including interest, is \$3,903,458 and will be credited to customers through the fuel clause rider in April, May, and June of 2020. Any over or under-refunding will be captured in the balance of unrecovered expenses in future months.

Confidential Information

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

We request confidential treatment of the Attachment A pursuant to S.D. Codified Laws Chapter 20:10:01:41. The Company submits the following justification for confidential treatment of Attachment A.

- (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. Updated Attachment A 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 Updated Attachment A be recognized as trade secret data in perpetuity.

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

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- (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 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.

Attachment A includes proprietary business information which the Company does not disclose to the public.

Please call me at (605) 339-8350 if you have any questions regarding this filing.

Sincerely,

/s/

STEVE KOLBECK
PRINCIPAL MANAGER

Enclosure