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Xcel Energy

Data Request No. 1-11

Docket No.: EL20-026

Response To: South Dakota Public Utilities Commission

Requestor: Patrick Steffensen

Date Received: October 27, 2020

Question:

Explain in detail the alterations made to the Mower Wind turbines with the repowering project. What are the capacities and capacity factors before and after the repowering?

Response:

After refurbishment, 42 of the 43 turbines will have new blades of 108 meters in diameter replacing the original 93-meter diameter blades. New hubs will also be installed on these turbines. One turbine will have refurbished 93-meter blades installed as it is in a microwave beam path and the blade size cannot be increased. All 43 wind turbines will have the main gear drives replaced. The 42 turbines with the longer blades will have a concrete collar installed on top of the existing foundation for the increased wind loading.

See the table below for the capacity and capacity factor before and after the repowering.

	Before	After
Nameplate Capacity	98.9 MW	98.9 MW
	[PROTECTED DATA BEGINS]	
Net Capacity Factor		

PROTECTED DATA ENDS]

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

- (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 of the curtailment information contained in Data Request No. 1-9 on the grounds that the material is trade secret information, the disclosure of which could result in damage to the Company's financial or competitive position with respect to negotiations with parties for the purchase of power. Curtailment pricing is negotiated under the terms of a Power Purchase Agreement and 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 Data Request No. 1-9 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."

- (5) The factual basis that qualifies the information for confidentiality under the authority cited.**

Curtailment pricing derives independent economic value from not being generally known as negotiating parties could use the information to their advantage in future power purchase transactions.

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