

- ☐ Not Public Document – Not For Public Disclosure
☒ Public Document – Not Public Data Has Been Excised
☐ Public Document

Xcel Energy

Data Request No. 1-12

Docket No.: EL20-026

Response To: South Dakota Public Utilities Commission

Requestor: Patrick Steffensen

Date Received: October 27, 2020

Question:

Was the interconnection for the Mower Wind site sufficient to handle the increased output at that site after the repowering? What were the curtailment amounts before and after the repowering?

Response:

The Mower County Wind project will utilize the existing MISO interconnection service granted under their Generator Interconnection Agreement (GIA). The GIA provides sufficient interconnection rights to accommodate the full output of the facility.

There is no curtailment information for the repowered project since it has not yet gone into service. The curtailment for the project before the repowering is as follows:

Year	Mower County	
	MWh	Costs
	[PROTECTED DATA BEGINS]	
2015		
2016		
2017		
2018		
2019		
2020 YTD August		

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. 1-12 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. 1-12 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.**

Steve T. Kolbeck
Principal Manager
500 W. Russell Street
P.O. Box 988
Sioux Falls, SD 57101
(605) 339-8350
steve.t.kolbeck@xcelenergy.com

- (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.

Curtailed 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.

Preparer:	Randall L. Oye
Title:	Transmission Analyst
Department:	Market Operations
Telephone:	612-330-2886
Date:	November 10, 2020