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Xcel Energy

Data Request No. 1-9

Docket No.: EL20-026

Response To: South Dakota Public Utilities Commission

Requestor: Patrick Steffensen

Date Received: October 27, 2020

Question:

Were the interconnections for the Jeffers Wind and Community Wind North sites sufficient to handle the increased output at those sites after the refurbishing? What were the curtailment amounts before and after the refurbishing?

Response:

The Jeffers Wind and Community Wind North projects will utilize the existing MISO interconnection service granted under their Generator Interconnection Agreements (GIA). The GIAs provide sufficient interconnection rights to accommodate the full output of the facilities.

There is no curtailment information for the repowered projects since they have not yet gone into service. The curtailment for the projects before the repowering is as follows:

	Jeffers Wind		Community Wind North	
Year	MWh	Costs	MWh	Costs
	[PROTECTED DATA BEGINS			
2015				
2016				
2017				
2018				
2019				
2020				

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.

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.

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Date:	November 10, 2020