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Xcel Energy Data Request No. 2-1  
Docket No.: EL21-014  
Response To: South Dakota Public Utilities Commission  
Requestor: Brittany Mehlhaff  
Date Received: September 3, 2021

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Question:

Provide updated tracker tables that reflect the 2021 actual DSM expenses and DSM recoveries through August. Provide any resulting updates to the proposed rate.

Response:

We have updated the 2021 tracker table with actual expenditures through August 2021. Based on this update our proposed rate increased from \$0.000528/kWh in 2021 to \$0.000554/kWh for 2022. Additionally, the updated rate is an increase of \$0.000017/kWh from our original 2020 Annual Report amount of \$0.0005368/kWh, filed in May.

As part of this response, we have updated Attachment D1-D4, including the updated tracker for 2021, to capture the current information.

Please note, as shown in the updated 2021 tracker, through August 2021 we have exceeded the approved 2021 budget by 4.78% and have revised the forecast for the remainder of 2021 to our planned annual expenditure of \$894,992 or 108% of the approved budget total. The Commission’s 2013 Order in Docket No. EL13-015 allows the Company expenditure flexibility of 10% above the total Commission approved budget.

The updated calculation is as follows:

**[CONFIDENTIAL DATA BEGINS HERE]**

**CONFIDENTIAL DATA ENDS HERE]**

This calculation results in a rate that would recover the sum of the beginning balance, approved expenditures, and estimated incentives over the January 1, 2021 – December 31, 2022 period.

In compliance with South Dakota Admin. R. 20:10:01:40, we have clearly marked each page of the confidential version with the term “CONFIDENTIAL”. A public non-confidential version is also being filed simultaneously.

**Pursuant to South Dakota Admin. R. 20:10:01:41, the Company submits the following justification for confidential treatment of Information Request No. 2-1 and Attachment D2.**

**(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 contains trade secret information, the disclosure of which would result in material damage to the Company’s financial or competitive position. The petition 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 the petition be recognized as confidential 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 Company requests confidential treatment because the information is both trade secret and proprietary. 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 “[d]erives 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.**

Consistent with the terms of the Settlement Stipulation approved by the Commission in the Company’s 2012 electric rate case (Docket EL12-046), the rate of return on equity is confidential.

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