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Xcel Energy Data Request No. 1-1  
Docket No.: EL22-010  
Response To: South Dakota Public Utilities Commission Staff  
Requestor: Eric Paulson  
Date Received: September 14, 2022

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Question:

Provide updated tracker tables that reflect the 2022 actual DSM expenses and DSM recoveries through August. Provide any resulting updates to the proposed rate.

Response:

We have updated the 2022 tracker table with actual expenditures through August 2022. Based on this update our proposed rate decreases from \$0.000554/kWh in 2021 to \$0.000479/kWh for 2022. Additionally, the updated rate is a decrease of \$0.000008/kWh from our original 2021 Annual Report amount of \$0.000487/kWh, filed in May.

As part of this response, we have updated Attachment D1-D4, including the updated tracker for 2022, to capture the current information.

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, 2023 period.

This rate of **[CONFIDENTIAL DATA BEGINS HERE  
CONFIDENTIAL DATA ENDS HERE]** does not consider carrying charges, which are negative for several months during 2023. To get as close as possible to a \$0 balance by Dec 31, 2023, the rate was incrementally decreased to \$0.479/ MWh to reflect future inclusion of carrying charges, until the balance approached \$0 without going negative.

We further acknowledge a typo on page 14 of our petition in the second to last paragraph. The paragraph should have read as follows:

If Commission approval of the proposed adjustment is delayed beyond the timeframe needed to implement the rate change by January 1, 2023, the Company will continue to apply the current DSM Cost Adjustment of **\$0.000554** per kWh up to the first cycle of the first full billing period following Commission approval of a revised factor.

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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Date: September 28, 2022