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Xcel Energy Data Request No. 1-1
Docket No.: EL23-013
Response To: South Dakota Public Utilities Commission
Requestor: Eric Paulson
Date Received: September 6, 2023

Question:

Provide updated tracker tables that reflect the 2023 actual DSM expenses and DSM recoveries through August. Provide any resulting updates to the proposed rate. Within the update, include the necessary updates as a result of the EL22-017 Xcel rate case as it pertains to Attachment C and other attachments.

Response:

We have updated the 2023 tracker table with actual expenditures through August 2023. Based on this update our proposed rate increased from \$0.000479/kWh in 2023 to \$0.000487/kWh for 2024. Additionally, the updated rate is a decrease of \$0.000016/kWh from our original 2022 Annual Report amount of \$0.000503/kWh, filed in May.

As part of this response, we have updated Attachment C and Attachment D1-D4, to capture current information. In the updated trackers the Company notes the following:

- The negative expenditures in August are related to an invoice for Saver Switch maintenance that was incorrectly accounted for earlier in the year. This charge was removed resulting in the negative charge as the invoice was larger than total spend of the other programs in August; and
- The Company has adjusted the carrying charge because of the Commission’s Decision in Docket No. EL22-017 adjusting rates. We have put these in place beginning in January of 2023 for consistency with other riders. We have included the updated details as part of our response in updated Attachment C.

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, 2023 – December 31, 2024 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.

- (5) 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 2022 electric rate case (EL22-017), the rate of return on equity is confidential.

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Date: September 20, 2023