



**Public
Version Enclosed**

5000 West Russell Street
P.O. Box 988
Sioux Falls, SD 57101-0988

May 1, 2025

—Via Electronic Filing—

Ms. Patricia Van Gerpen, Executive Director
South Dakota Public Utilities Commission
State Capitol Building
500 East Capitol Avenue
Pierre, South Dakota 57501-5070

RE: PETITION
2024 DSM STATUS REPORT

Dear Ms. Van Gerpen:

Enclosed for filing is a Petition by Northern States Power Company requesting approval of our 2024 DSM Status Report which includes our request for approval of cost recovery for 2024 actual expenditures and incentive, and proposed DSM Cost Adjustment Factor. As discussed with Commission Staff preceding this filing, we will file our 2026 DSM Plan on August 1, 2025 as well as a request to change the date for subsequent report and plan filings from May 1 to August 1.

The Company intends to file a DSM Plan in South Dakota for 2026, however, we continue to review the portfolio in light of the Commission's comments in December of 2024. We believe the DSM Plan is an important part of our overall energy portfolio, providing a least-cost resource of energy efficiency to our customers. In addition, we recognize changes to technology and opportunities for energy efficiency. As a result, we will supplement our Petition by August 1, 2025 with a new plan addressing such new opportunities and being responsive to the Commission.

In accordance with South Dakota Admin. R. 20:10:01:39 through 42, Xcel Energy respectfully requests confidential treatment of certain information contained in this filing. In compliance with South Dakota Admin. R. 20:10:01:41, 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 this petition.

(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;

The Petition and attachments B and C2 contain confidential information. This confidential information includes trade secret information that the Company takes efforts to protect from public disclosure, the disclosure of which would result in material damage to the Company's financial or competitive position, and which thus has independent economic and commercial value from not being generally known to, and not being readily ascertainable by other parties, who could obtain economic value from its disclosure or use.

(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 claim for confidential treatment is based on South Dakota Admin. R. 20:10:01:39 and S.D. Codified Laws § 1-27-30, which identify confidential information that is exempt from public inspection, including trade secrets or other confidential commercial information and information which is otherwise made confidential under any other provisions of state or federal law. Specifically, the

Petition includes information that qualifies as confidential, non-public information by one or more of the following S.D. Codified Laws Chapters:

§ 1-27-1.5(3) Trade secrets, the specific details of bona fide research, applied research, or scholarly or creative artistic projects being conducted at a school, postsecondary institution, or laboratory funded in whole or in part by the state, and other proprietary or commercial information which if released would infringe intellectual property rights, give advantage to business competitors, or serve no material public purpose.

§ 1-27-28, which defines “proprietary information” 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.”

The information contained within the referenced documents also meets the definition of “trade secret” under SDCL § 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.

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.

For any questions regarding this filing, please feel free to call me at (605) 339-8350 or email Steven.T.Kolbeck@xcelenergy.com or contact Luke Anderson at (612) 216-9238 or email Luke.Anderson@xcelenergy.com.

Sincerely,

A handwritten signature in cursive script that reads "Steve Kolbeck". The signature is written in dark ink and is positioned above the printed name and title.

Steve Kolbeck
Principal Manager –South Dakota