

Attachments A through C are marked as:

**CONFIDENTIAL DOCUMENT
NOT FOR PUBLIC DISCLOSURE
CONFIDENTIAL IN ENTIRETY**

Request for Confidential Treatment of Information:

Pursuant to ARSD § 20:10:01:41, the Company respectfully requests confidential treatment of the information attached to this response, and provides the following information in support of our request:

(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:

Attachments A through C contain confidential commercial information regarding the Company's financial and legal terms of engagement with a third-party, HomeServe. The Company treats this information as highly confidential information, and as financial information, not released to the public. Attachments A through C are marked as Confidential in Entirety.

(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 confidential attachments be treated as confidential forever.

(3) The name, address, and phone number of a person to be contacted regarding confidentiality request:

Ian Dobson
Assistant General Counsel
Xcel Energy Services Inc.
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(612) 370-3578
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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 material is confidential, trade secret, and/or proprietary business information, the disclosure of which would result in material damage to Xcel Energy's financial position. See ARSD §§ 20:10:01:39 and 20:10:01:42.

(5) The factual basis that qualifies the information for confidentiality under the authority cited:

Attachments A through C contain information about a non-affiliated third-party and vendor of Xcel Energy, HomeServe, and the costs and terms of Xcel Energy's engagement with that party. Such information is considered confidential commercial information, which the Company does not disclose to the public, as it includes the cost of Xcel Energy's continued billing support obligations; Xcel Energy's other revenues and costs associated with HomeServe engagement; and the length of the engagement, among other commercial terms. Disclosure of such information could harm the Company's ability to obtain service at the lowest available cost because knowledge of the Company's costs could affect future commercial contract negotiations. HomeServe also considers such information proprietary and confidential, as it includes the commission fees paid by HomeServe to Xcel Energy and other terms of the Administrative Agreement and Marketing Agreement, which information HomeServe has made reasonable efforts to keep confidential. Disclosure of such information could undermine vendors' efforts to receive compensation for their proprietary commercial information.