PUBLIC DOCUMENT
CONFIDENTIAL DATA HAS BEEN EXCISED

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Xcel Energy		Data Request No.	1-1
Docket No.:	EL26-022		
Response To:	South Dakota Public Utilities Commission Staff		
Requestor:	Brittany Mehlhaff		
Date Received:	October 28, 2026		

Question:
Provide excel files, with formulas intact, for Attachment A, Attachment B, Attachment C2, the table on Attachment C3, and Attachment E.

Response:
The Company offers the following attached Excel files:

- 2025 Status Report.xlsm was used to generate Attachment A – CONFIDENTIAL IN ENTIRETY
- 2026 DSM Cost Rider Workbook.xlsx was used to generate Attachment B and Attachment C2 - CONFIDENTIAL IN ENTIRETY
- SD – DSM - Bill Impact.xlsx was used to generate Attachment C3 - CONFIDENTIAL IN ENTIRETY
- 2027 SD Plan.xlsm was used to generate Attachment E - CONFIDENTIAL IN ENTIRETY

We request confidential treatment of the attachments to Data Request No. 1-001. **Pursuant to S.D. Administrative Rules 20:10:01:41, the Company submits the following justification for confidential treatment.**

(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 attachments to Data Request 1-1 contain confidential information. This confidential information includes confidential and proprietary workbooks setting out the data and methodology used by the Company to generate the information supporting its application and forecast data that Xcel Energy protects as not-public information, both of which have 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 attachments to this response be recognized as confidential data in perpetuity.

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

Steve T. Kolbeck
Principal Manager
500 W. Russell Street
P.O. Box 988
Sioux Falls, SD 57101
(605) 339-8350
steve.t.kolbeck@xcelenergy.com

(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 research, development, or commercial information and information which is otherwise made confidential under any other provisions of state or federal law. Specifically, the attachments to this response include 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.

The attachments to this response contain confidential data Xcel Energy protects as not-public information for the reasons detailed in Part (1) above.

Preparer:	Karl Shlanta
Title:	Regulatory Policy Specialist
Department:	Customer Energy and Transportation Solutions
Telephone:	612-330-6346
Date:	November 12, 2026