



2302 Great Northern Drive
P O Box 2747
Fargo, ND 58108-2747
(701) 241-8632
dave.sederquist@xcelenergy.com

June 19, 2009

RECEIVED

Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
State Capitol Building, Dept. 408
600 East Boulevard
Bismarck, ND 58505-0480

JUN 22 2009

PUBLIC SERVICE COMMISSION

SUBJECT: Xcel Energy's External Review of Revenue Cycle Processes

Dear Mr. Rafferty:

Enclosed is an Application for Trade Secret Protection for information related to an external review by Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") of its revenue cycle processes currently being conducted by Global Enterprise Managers, Inc. ("GEM").

We believe it is important that trade secret protection be granted because the GEM document contains sensitive data and information pertaining to the operation and management of Xcel Energy's revenue cycle functions and related technology systems. The information could be used by competitors against the interests of Xcel Energy, and could also be used to gain an advantage by potential vendors when negotiating with Xcel Energy in the future for services, billing systems or other related technology.

Please call me if you have any questions. Thank you.

Sincerely,

David H. Sederquist
Sr. Consultant, Regulation & Finance
Xcel Energy

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF NORTH DAKOTA**

IN THE MATTER OF THE RESOLUTION OF
NATURAL GAS METER AND BILLING
SERVICE ISSUES OF NORTHERN STATES
POWER COMPANY, A MINNESOTA
CORPORATION OPERATING IN NORTH
DAKOTA

CASE NO. PU-08-627

APPLICATION FOR TRADE SECRET PROTECTION

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or the “Company”) respectfully moves the North Dakota Public Service Commission (the “Commission”) for entry of a trade secret protective order pursuant to Section 69-02-09-01 of the North Dakota Administrative Code. The purpose of the requested protective order is to protect against public disclosure of trade secret information filed in the above-referenced applications as defined by N.D.C.C. § 47-25.1-01(4).

1. A general description of the nature of the information sought to be protected.

Sensitive data and information pertaining to the operation and management of Xcel Energy’s revenue cycle functions and related technology systems.

2. An explanation of why the information derives independent economic value, actual or potential, from not being generally known to other persons.

The information could be used by competitors against the interests of Xcel Energy in the future. This information could also be used to gain an advantage by potential vendors when negotiating with Xcel Energy for services, billing systems or other related technology.

3. An explanation why the information is not readily ascertainable by proper means by other persons.

Xcel Energy has consistently maintained the confidentiality of this information. The information is not disclosed to the public or to persons other than employees or authorized agents who need to know the information to fulfill their responsibilities.

The Company has requested that this information be treated as trade secret in all of its regulatory filings and other sharing of this information with all other governmental entities.

4. A general description of the persons or entities that would obtain economic value from disclosure or use of the information.

Other utilities or third party providers of revenue cycle services would obtain economic value from disclosure of this information.

5. A specific description of known competitors and competitor's goods and services that is pertinent to the tariff or rate filing.

See response to No. 4.

6. A description of the efforts used to maintain the secrecy of the information.

See response to No. 3.

In accordance with Section 69-02-09-02 of the North Dakota Administrative Code, one copy of the trade secret material is provided in the enclosed sealed envelope which is labeled: **TRADE SECRET – PRIVATE.**

Respectfully submitted this 19th day of June, 2009.

Northern States Power Company,
a Minnesota corporation

By _____
Megan J. Hertzler
Assistant General Counsel