

**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

CASE No. PU-08-627
RECEIVED

AUG 19 2009

PUBLIC SERVICE COMMISSION

APPLICATION FOR TRADE SECRET PROTECTION

Northern States Power Company, a Minnesota corporation (“Xcel Energy” or the “Company”) respectfully requests the North Dakota Public Service Commission (the “Commission”) for entry of a trade secret protective order pursuant to § 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 contained in a report produced by Global Enterprise Managers, Inc. on behalf of the Company and filed in the above-referenced matter 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 operating and management of Xcel Energy’s revenue cycle function and related technology systems.

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

The information on various internal systems is commercially valuable could have economic benefit to potential vendors, contractors and suppliers who may desire to provide services, billing systems or other related technology to us in the future. In addition, public disclosure of information related to our internal systems and how they interconnect may pose a systems security risk.

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

Xcel Energy has consistently maintained the confidentiality of the information for which we are seeking protection. 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 in connection with billing our customers or vendors whose contracts contain confidentiality provisions.

For this reason, 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 governmental entities.

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

Billing service vendors, software companies, technology consultants and other utilities 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 18th day of August, 2009

Northern States Power Company,
a Minnesota corporation

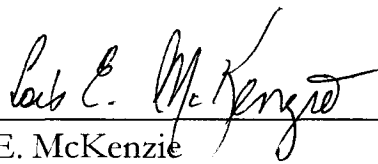
By: 

CERTIFICATE OF SERVICE

I, Lois E. McKenzie, hereby certify that I have this day served copies of the foregoing document on the attached list of persons by delivery by hand via Federal Express overnight service from Minneapolis, Minnesota.

DOCKET NO. PU-08-627

Dated this 18th day of August 2009.

/s/ 

Lois E. McKenzie

Darrell Nitschke
Executive Director and Director of Administration
North Dakota Public Service Commission
State Capitol Building, Dept 408
600 East Boulevard
Bismarck, ND 58505-0480