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November 12, 2009

**PUBLIC SERVICE COMMISSION**

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

**Re: 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**

Dear Mr. Nitschke:

On November 5, 2009, Northern States Power Company, a Minnesota corporation ("Xcel Energy" or the "Company") submitted its Action Plan developed in response to recommendations contained in the report of Global Enterprise Managers, Inc. ("GEM") documenting their review of the Company's internal revenue cycle functions and related technology systems (the "GEM Report"). Included with our Action Plan filing was an Application for Trade Secret Protection for the non-public information marked as trade secret contained in the Action Plan.

The Company previously filed the preliminary GEM Report on August 18, 2009 in the above-reference matter. At that time, we submitted an Application for Trade Secret Protection for information contained in the GEM Report. On September 25, 2009, we filed the final GEM Report. On October 14, 2009, the Commission issued an Order Granting Trade Secret Protection for the specific instances of trade secret information contained in the GEM Report as defined by N.D.C.C. § 47-25.1-01(4).

Portions of the Company's Action Plan contain information from the GEM report that was previously designated as trade secret and granted protection under the Commission's October 14, 2009 Order. In addition, the Action Plan also contains some new information that is the subject of our November 5, 2009 Application for


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Trade Secret Protection. The three bullet points below provide a detailed description of the trade secret data contained in our Action Plan and the new information for which we requested trade secret protection in our November 5, 2009 Application.

- Pages 6, 8, 9, and 10 of our Action Plan contain information that is marked as trade secret.
- The first two columns in the tables on each of these pages contain information taken directly from Appendix A of the final GFM report, and as such, this data has already been granted trade secret protection under the Commission's October 14, 2009 Order.
- The last three columns in the tables contain the new information for which we requested trade secret protection in our November 5, 2009 Application.

We hope this clarification facilitates Commission review of the trade secret data contained in our Action Plan and the Application for Trade Secret Protection of that data. Please contact me at (612) 215-4589 if you have any questions or if I can provide further information.

Sincerely,



Megan J. Hertzler