

**STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION**

Northern States Power Company 2013 Electric Rate Increase Application	Case No. PU-12-813
Northern States Power Company Advanced Determination of Prudence – Courtenay Wind Project Application	Case No. PU-13-706
Northern States Power Company Advanced Determination of Prudence – Odell Wind Project Application	Case No. PU-13-707
Northern States Power Company Advanced Determination of Prudence – Pleasant Valley Wind Project Application	Case No. PU-13-708
Northern States Power Company Advanced Determination of Prudence – Border Winds Project Application	Case No. PU-13-742
Northern States Power Company 150 MW Border Winds Project – Rolette County Public Convenience And Necessity	Case No. PU-13-743
Northern States Power Company Advance Determination of Prudence – NG Generators Application	Case No. PU-13-194
Northern States Power Company Red River Valley NG Units 1 & 2 – Hankinson, ND Public Convenience And Necessity	Case No. PU-13-195

**ADVOCACY STAFF'S RESPONSE TO REQUEST FOR PROTECTION OF
INFORMATION**

On February 14, 2017 and February 20, 2017, Northern States Power Company (Xcel Energy or the Company) filed applications for protection of information pursuant to North Dakota Administrative Code Section 69-02-09-01, requesting a protective order

limiting disclosure of "Trade Secret" information. Supplemental applications for protection of information were filed on July 15, 2017 and August 7, 2017 (All applications for protection collectively referred to as "The Applications").

The substance of the Applications is trade secret information that may be provided to the North Dakota Public Service Commission, its staff, or staff consultants during discovery, in filed testimony, presented at hearing, throughout settlement discussions, or as otherwise provided during the course of the case. More specifically, the information includes:

- The Company's system production costs;
- Detailed cost and company resource information developed;
- Power purchase agreement terms including agreement terms, pricing, costs to the Company from vendors or other third parties, salaries and other personal information;
- Resource planning assumptions based upon proprietary information; and
- Information provided by third parties as confidential and for which the company has an obligation to keep confidential.

Advocacy Staff has reviewed the Applications and the requirements for protection. Advocacy Staff agrees that the Company adequately has demonstrated a basis for protection.

THEREFORE, Advocacy Staff respectfully requests that a protection order limiting disclosure of information provided as specified in the February 14, 2017, February 20, 2017, July 15, 2017 and August 7, 2017 Applications be GRANTED.

Dated this 2nd day of October 2017.

A handwritten signature in black ink, consisting of a large, stylized loop followed by a horizontal line that tapers to the right.

John M. Schuh
Advocacy Counsel