

STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION

**Case No. PU-12-813  
Northern States Power Company  
2013 Electric Rate Increase  
Application**

**Case No. PU-13-706  
Northern States Power Company  
Advance Prudence – Courtney Wind  
Application**

**Case No. PU-13-707  
Northern States Power Company  
Advance Prudence – Odell Wind Pjc  
Application**

**Case No. PU-13-708  
Northern States Power Company  
Advance Prudence – Pleasant Valley  
Application**

**Case No. PU-13-742  
Northern States Power Company  
Advance Prudence – Border Winds  
Application**

**Case No. PU-13-743  
Northern States Power Company  
150 MW Border Winds Project – Rolette County, ND  
Public Convenience & Necessity**

**Case No. PU-13-194  
Northern States Power Company  
Advance Prudence– NG Generators  
Application**

**Case No. PU-13-195  
Northern States Power Company  
Red River Valley NG Units 1 & 2 –Hankinson, ND  
Public Convenience & Necessity**

**AFFIDAVIT OF SERVICE BY REGULAR MAIL**

STATE OF NORTH DAKOTA  
COUNTY OF BURLEIGH

**Geralyn R. Schmaltz** deposes and says that:

she is over the age of 18 years and not a party to this action and, **on the 3rd day of October, 2017**, she deposited in the United States Mail, Bismarck, North Dakota, **3 envelopes** by first class mail, fully prepaid a copy of:

- **Advocacy Staff's Response to Request for Protection of Information**

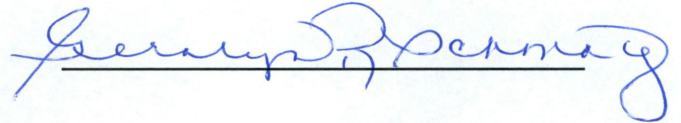
The envelopes were addressed as follows:

Zeviel T. Simpser  
Briggs and Morgan, P. A.  
2200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-2157

Amanda Rome  
Briggs and Morgan, P. A.  
2200 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402-2157

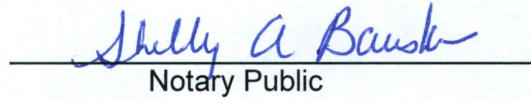
Dave Sederquist  
Xcel Energy  
2302 Great Northern Drive  
Fargo, ND 58102

The post office address shown is the respective addressee's last reasonably ascertainable post office address.



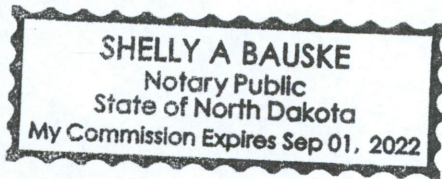
Jerry D. Penney

Subscribed and sworn to before me  
this **3rd day of October, 2017.**



Shelly A. Bauske  
Notary Public

SEAL



Oct. 2, 2017

Darrell Nitschke  
Executive Secretary  
North Dakota Public Service Commission  
600 E. Blvd. Ave. Dept. 408  
Bismarck, ND 58505-0480

*via hand delivery*

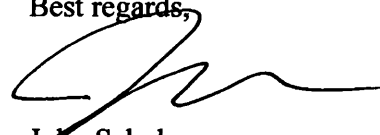
Re: Northern States Power Company  
2013 Electric Rate Increase  
Application

PU-12-813 *et al.*

Dear Mr. Nitschke:

Enclosed is a Staff Response to the 14 February 2017 and 20 February 2017 Applications for Protection of Information in the captioned cases.

Best regards,



John Schuh  
Legal Counsel

c:w/encl: David Sederquist  
Zeviel Simpser

198 PU-13-743 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
186 PU-13-742 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
204 PU-13-195 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
187 PU-13-194 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
182 PU-13-708 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
183 PU-13-707 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
183 PU-13-706 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information  
342 PU-12-813 Filed 10/02/2017 Pages: 4  
Staff Response to Request for Protection of Information

**STATE OF NORTH DAKOTA  
PUBLIC SERVICE COMMISSION**

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

**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 2<sup>nd</sup> 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