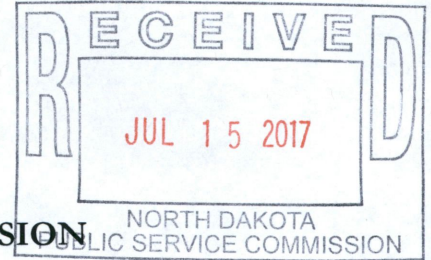


**STATE OF NORTH DAKOTA
BEFORE THE
NORTH DAKOTA PUBLIC SERVICE COMMISSION**



Northern States Power Company
2013 Electric Rate Increase Application

Case No. PU-12-813

Northern States Power Company
Advanced Determination of Prudence –
Courtenay Wind Application

Case No. PU-13-706

Northern States Power Company
Advanced Determination of Prudence –
Odell Wind Application

Case No. PU-13-707

Northern States Power Company
Advanced Determination of Prudence –
Pleasant Valley Application

Case No. PU-13-708

Northern States Power Company
Advanced Determination of Prudence –
Border Winds Application

Case No. PU-13-742

Northern States Power Company
150 MW Border Winds Project – Rolette
County, ND Public Convenience &
Necessity

Case No. PU-13-743

Northern States Power Company
Advanced Determination of Prudence –
NG Generators Application

Case No. PU-13-194

Northern States Power Company
Red River Valley NG Unites 1&2 –
Hankinson, ND Public Convenience &
Necessity

Case No. PU-13-195

SUPPLEMENTAL APPLICATION FOR TRADE SECRET PROTECTION

196 PU-13-195 Filed 07/15/2017 Pages: 4
Supplemental Application for Protection of Information
179 PU-13-194 Filed 07/15/2017 Pages: 4
Supplemental Application for Protection of Information
190 PU-13-743 Filed 07/15/2017 Pages: 4
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178 PU-13-742 Filed 07/15/2017 Pages: 4
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174 PU-13-708 Filed 07/15/2017 Pages: 4
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175 PU-13-707 Filed 07/15/2017 Pages: 4
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Supplemental Application for Protection of Information

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), respectfully requests the North Dakota Public Service Commission (Commission) enter a trade secret protective order in the above-referenced cases pursuant to Chapter 69-02-09 of the North Dakota Administrative Code, extending the trade secret protection requested by the Company in its Application for Trade Secret Protection filed with the Commission on February 14, 2017.

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: **PROTECTED INFORMATION – PRIVATE**.

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

The information for which Xcel Energy seeks protection is that of contract pricing for power purchase agreements to which the Company is a party. Such information has been or will be marked as **TRADE SECRET** in our responses to data requests and in the pre-filed testimony submitted by the Company, or may arise or be discussed in the hearing or hearings in this matter.

The Company states that this information is commercial information because it is “information pertaining to buying or selling of goods and services that has not been previously publicly disclosed and that if the information were to be disclosed . . . would cause substantial competitive injury to the person from which the information as obtained,” as provided in N.D.C.C. § 44-04-18.4(2)(a).

The Company further states that this information is trade secret because it is information that “(1) [d]erives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by, other persons that can obtain economic value from its disclosure or use; and (2) [i]s the subject of efforts that are reasonable under the circumstances to maintain the secrecy of the information,” as provided in N.D.C.C. § 44-04-18.4(2)(d). The Company also states that the information sought to be protected meets the definition of “trade secret” set forth in N.D.C.C. § 47-25.1-1(4).

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

Power pricing is generally held as confidential consistent with the Company’s contractual obligations. Third parties may derive economic value from disclosing this

information as it demonstrates the current pricing that Xcel Energy is paying under its contracts which can influence bids and other market strategies.

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

The confidentiality of this information has been maintained by Xcel Energy. 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 the subject matter of the information or to third persons pursuant to nondisclosure agreement to maintain the confidentiality of the information.

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 in North Dakota or other states.

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

The persons or entities that would obtain economic value from disclosure or use of the information include third parties that could obtain a business advantage from acquiring information regarding generation pricing paid by the Company. Disclosure of the information sought to be protected would provide these persons or entities with prior foreknowledge of information not readily available to the public.

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

See response to No. 4 above.

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

See response to No. 3 above.

Respectfully submitted this 15 day of July 2017

BRIGGS AND MORGAN, P.A.

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