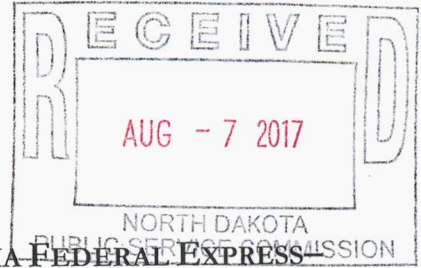




414 Nicollet Mall
Minneapolis, MN 55401



~~-VIA FEDERAL EXPRESS-~~

August 7, 2017

Darrell Nitschke, Executive Director
North Dakota Public Service Commission
State Capitol Building, Dept 408
600 East Boulevard
Bismarck, ND 59505-0480

RE: APPLICATION OF NORTHERN STATES POWER COMPANY FOR TRADE SECRET PROTECTION FOR CONSIDERATION OF A RESOURCE TREATMENT FRAMEWORK TO ADDRESS JURISDICTIONAL COST ALLOCATION ISSUES
CASE NOS. PU-12-813, PU-13-706, PU-13-707, PU-13-708, PU-13-742, PU-13-743, PU-13-194, AND PU-13-195

Dear Mr. Nitschke:

Northern States Power Company, doing business as Xcel Energy (Xcel Energy or the Company), respectfully submits an original and eleven (11) copies of the enclosed Supplement to Application for Trade Secret Protection for the above-referenced Cases; and one (1) copy of the trade secret version of the Direct Testimony of Mr. Charles Burdick in the above-referenced cases, which have been placed in a sealed envelope and labeled **PROTECTED INFORMATION – PRIVATE**, in accordance with Section 69-02-09-02 of the North Dakota Administrative Code.

Additionally, this Supplement to Application for Trade Secret Protection will describe Trade Secret material that is also being provided to the Commission in the above referenced Cases through a courtesy filing of comments made by the Company in a parallel proceeding before the Minnesota Public Utilities Commission (MPUC).

181 PU-13-194 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

192 PU-13-743 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

180 PU-13-742 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

176 PU-13-708 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

177 PU-13-707 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

177 PU-13-706 Filed: 8/7/2017 Pages: 6
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331 PU-12-813 Filed: 8/7/2017 Pages: 6
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198 PU-13-195 Filed: 8/7/2017 Pages: 6
Supplement to Application for Protection of Information

Darrell Nitschke, Executive Director

August 7, 2017

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The purpose of our request for Trade Secret Protection is to protect against public disclosure of trade secret, personnel, and other commercially-sensitive information that may be provided to the North Dakota Public Service Commission (Commission or NDPSC), its staff, or staff consultants either via responses to data requests, in pre-filed testimony, that may arise at hearing, as may be required in any settlement discussion, or as otherwise would need to be provided in the course of the case.

The attached Direct Testimony of Mr. Charles Burdick has been marked as TRADE SECRET as it contains information that could have economic value to potential vendors, contractors, and suppliers who may desire to provide services to the Company in the future; to analysts, investors, and potential investors in the Company; and other entities who may compete with the Company for available resources. Furthermore, cost and resource information may have independent value in the marketplace, and if left unprotected, could be harmful for the Company's customers in North Dakota.

We look forward to working with the Commission to answer any questions that may arise in granting this determination. Thank you in advance for your review of this filing.

Sincerely,



DAVID H. SEDERQUIST
SENIOR REGULATORY AND FINANCIAL CONSULTANT

cc: Sara Cardwell
Amanda Rome

Enclosures

**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

**SUPPLEMENT TO
APPLICATION FOR TRADE SECRET PROTECTION**

Northern States Power Company (Xcel Energy or the Company) respectfully files this Supplement to its February 13, 2017 Application for Trade Secret Protection and 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. The purpose of the requested protective order is to protect trade secret and commercial information as defined by N.D.C.C. § 44-04-18.4 from public disclosure pursuant to N.D.C.C. § 44-04-18 or any other applicable public disclosure laws.

The Company provides this supplement to identify additional information not initially discussed in its February 13, 2017 Trade Secret Application which was requested in discovery or otherwise filed with the Commission in the above referenced Cases.

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

Xcel Energy seeks protection of information related to Company's system production costs. Such information has been marked as **TRADE SECRET** in selected portions of our Direct Testimonies.

The Company states that this information is commercial information because it is "information pertaining to buying and 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 was 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. § 47-25.1-01(4).

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

The information could have economic value to potential vendors, contractors, and suppliers who may desire to provide services to the Company in the future; to analysts, investors, and potential investors in the Company; and other entities who may compete with the Company for available resources. Furthermore, the Company's system production costs may have independent value in the marketplace, and if left unprotected, could be harmful for the Company's customers.

- 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 vendors and generation developers; entities with which Xcel Energy currently conducts or may conduct business; and other utilities. Disclosure of the information sought to be protected would provide these persons and entities 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.

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.**

Respectfully submitted this 7th day of August, 2017

BRIGGS AND MORGAN, P.A.

By: /s/ Zeviel Simpser
Zeviel Simpser (ND ID # 06794)
2200 IDS Center
80 South Eighth Street
Minneapolis, Minnesota 55402-2157
Telephone: (612) 977-8400
Fax: (612) 977-8650