

August 11, 2016

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

RE: Northern States Power Company
Integrated Resource Plan
Application for Protection of Information

PU-15-19

Dear Mr. Nitschke:

Enclosed is the Staff Response to Northern States Power Company's ("Company") Amended Application for Protection of Information submitted on 1 February 2016. Staff has reviewed the request of the Company and believes that the Company's application satisfies the requirement for Protection of Information.

Respectfully,



John M. Schuh
Staff Attorney

STATE OF NORTH DAKOTA
PUBLIC SERVICE COMMISSION

**Northern States Power Company
Integrated Resource Plan
Information**

Case No. PU-15-19

**STAFF RESPONSE TO THE AMENDED REQUEST OF NORTHERN STATES
POWER COMPANY FOR PROTECTION OF INFORMATION**

On January 5, 2015, Northern States Power Company (Xcel Energy or the Company), filed an application for trade secret protection pursuant to North Dakota Administrative Code Section 69-02-09-1 for protection from public disclosure as a "Trade secret" as defined by North Dakota Century Code Section 47-25.1-01(4). On January 29, 2016 the Company filed an amended application for protection of information. The stated purpose is to protect any trade secret and commercial information pursuant to North Dakota Century Code § 44-04-18.4, or any other applicable disclosure laws.

The information for which the Company seeks protection includes private customer data and forecast data of annual system consumption and generation information with related technical studies, forecasted capital and O&M cost details, and critical infrastructure security data which have been marked as trade secret in the above referenced case.

The Company further states that the private customer data, forecast data of annual system consumption and generation information with related technical studies, forecasted capital and O&M cost details and critical infrastructure security data is trade secret because it is information that "(1) derives 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; and (2) is the subject of efforts that are reasonable under the circumstances to maintain the secrecy of the information,” as provided by North Dakota Century Code Section 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 North Dakota Century Code Section 47-25.1-01(4).

The information could have economic value to potential vendors, contractors, and suppliers as well as participants in the organized energy and capacity markets. Additionally, customer information could have economic value to vendors or services to utilities and their customers. Such a result could be harmful for the Company’s customers in North Dakota.

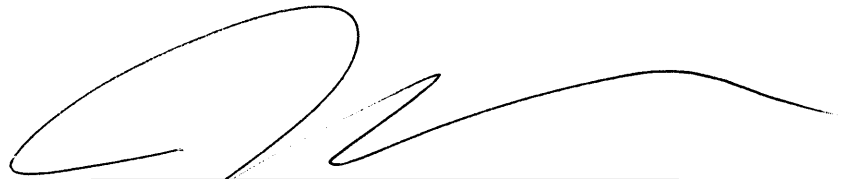
Other entities from which Xcel Energy purchases power and generation facilities (or could purchase power and generation facilities in the future) and other utilities would obtain economic value from disclosure of this information. Also, any entity that could derive value from customer information such as vendors of utility related services, behind the meter generation, and other entities interested in marketing to utility customers could also obtain economic value from this information.

The confidentiality of this information has been maintained by the Company. 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 Company’s proposal, or to third persons pursuant to nondisclosure agreement to maintain the confidentiality of the information.

Staff has reviewed the request of the Company. Staff believes that the Company's application satisfies the requirements of the North Dakota Century Code for protection of the information which is the subject of this request. The Commission's process provides a means for interested parties to review protected documents upon signing a nondisclosure agreement.

For reasons set forth above, Staff recommends that the Commission grant the applications of Northern States Power Company to protect certain filed information in the captioned case.

Dated this 11th day of August, 2016.

A handwritten signature in black ink, consisting of a large, stylized initial 'J' followed by a long, sweeping horizontal line that ends in a slight curve.

John M. Schuh
Legal Counsel
North Dakota Public Service Commission