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APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY FOR (1) §
RECONCILIATION OF ITS FUEL COSTS §
FOR 2002 AND 2003; (2) A FINDING OF §
SPECIAL CIRCUMSTANCES; AND (3) §
RELATED RELIEF §

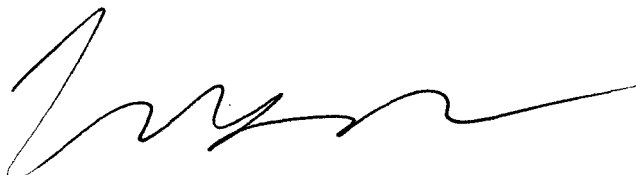
BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**OFFICE OF PUBLIC UTILITY COUNSEL'S SUPPLEMENTAL RESPONSE
TO SOUTHWESTERN PUBLIC SERVICE COMPANY'S SECOND
REQUEST FOR INFORMATION**

The Office of Public Utility Counsel stipulates that the following supplemental response(s) to SPS's 2nd request(s) for information may be treated by all parties as if the answers were filed under oath. These supplemental responses relate to the testimony of Eileen Pitchford.

Respectfully submitted,

Suzi Ray McClellan
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State Bar No. 16607620



Lanetta Cooper
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QUESTION No. 1-1:

Refer to the Direct Testimony of Eileen Pitchford. Please provide all information, documentation, etc. relied on by Ms. Pitchford regarding the claim made on page 9, lines 6 through 9, that “The coal-fired units were not added solely to meet growing demand on the SPS system. These units were also intended to provide generation with a fuel supply with lower price volatility and lower costs than natural gas.”

RESPONSE:

As indicated in response to Question 1 of SPS’s Second RFI to OPC, Ms. Pitchford realized that she needed to supplement her response to Question 2 of SPS’s First RFI to OPC to include the response to COA 5-16. As a result of her oversight, Ms. Pitchford again reviewed SPS responses to discovery and found that she had also directly relied upon other responses to SPS discovery. Accordingly, the RFI list in OPC’s response to SPS Question 1-2 should be supplemented to include the following RFI’s.

SPS1-2, RFI List (Supplement 1)

Responses, including any supplemental responses to

OPC’s Questions 3-7, 3-9, 3-10, 3-11, 3-12, 3-13

COA’s Questions 1-27, 5-16

Prepared By: Eileen Pitchford
Sponsored By: Eileen Pitchford

CERTIFICATE OF SERVICE

SOAH Docket No. 473-04-6558

PUC Docket No. 29801

I certify that on December 13, 2004, I served a true copy of the foregoing *Office of Public Utility Counsel's Supplemental Response To Southwestern Public Service Company's Second Request For Information* on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

A handwritten signature in black ink, appearing to read 'Lanetta Cooper', written over a horizontal line.

Lanetta Cooper