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SOAH DOCKET NO. 473-06-2536 PUC DOCKET NO. 32766

APPLICATION OF SOUTHWESTERN	§	
PUBLIC SERVICE COMPANY FOR (1)	§	
AUTHORITY TO CHANGE RATES; (2)	§	BEFORE THE 📜 🛌
RECONCILIATION OF ITS FUEL	§	The state of the s
COSTS FOR 2004 AND 2005; (3)	§	STATE OFFICE OF \(\begin{array}{c} \eqrapsilon \\
AUTHORITY TO REVISE THE SEMI-	§	
ANNUAL FORMULAE ORIGINALLY	§	ADMINISTRATIVE HEARINGS
APPROVED IN DOCKET NO. 27751	§	
USED TO ADJUST ITS FUEL	§	
FACTORS; AND (4) RELATED RELIEF	§	
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OFFICE OF PUBLIC UTILITY COUNSEL'S SEVENTH REQUEST FOR INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY

COMES NOW, the Office of Public Utility Counsel ("OPC"), and files this, its Seventh Request for Information to Southwestern Public Service Company ("SPS") in the captioned proceeding.

Under Commission Procedural Rules 22.141-.145, 16 Tex. Admin. Code Ch. 22, OPC requests that SPS, as defined herein, provide the following information and answer the following questions under oath. Please answer the questions and sub-questions in the order in which they are listed and in sufficient detail to provide a complete and accurate answer to the question.

Definitions

As used in this introduction and in these questions,

- (1) "SPS", the "Company", and "Applicant" refer to Southwestern Public Service Company and its affiliates;
- (2) "You", "yours" and "your" refer to SPS (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.

(3) "Document" and "documents" mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device or any other media, including, but not limited to, electronic mail (email), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

In answering these questions, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives, all others from whom you may freely obtain it, and your attorneys and their investigators.

Please answer each question based upon your knowledge, information, or belief, and any answer that is based upon information or belief should state that it is given on that basis.

If you have possession, custody, or control (as defined by Tex. R. Civ. P. 192.7(b)) of the originals of these documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original, whether by interlineation, receipt stamp, or notation.

If you do not have possession, custody, or control of the originals of the documents requested, please produce copies of the documents, however made, in your possession, custody, or control. If any document requested is not in your possession or subject to your control, please

explain why not, and give the present location and custodian of any copy or summary of the document.

Claim of Privilege

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Questions

The Definitions, Instructions, and Claim of Privilege set out in this Request for Information apply to these questions.

If any question appears confusing, please request clarification from the undersigned counsel.

In providing your responses, please start each response on a separate page and type, at the top of the page, the question that is being answered.

As part of the response to each question, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the question has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the question and who can vouch for the truth of the answer. If the question has sub-parts, please identify the witness or witnesses by sub-part.

Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer between the time of your original response and the time of the hearings, then you should submit, under oath, a supplemental response to your earlier answer.

If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if you object to any of the questions on the grounds that the question seeks confidential information, or on any other grounds, please call the undersigned counsel as soon as possible.

If the response to any question is voluminous, please provide separately an index to the materials contained in the response.

If the information requested is included in previously furnished exhibits, workpapers, responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references.

To the extent that a question asks for the production of copyrighted material, it is sufficient to provide a listing of such material, indicating the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

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- 7-1 For each witness testifying on affiliate costs please indicate all schedules, exhibits, and workpapers, by page and line number, applicable to each witness' testimony. The term "applicable" is not limited to material sponsored by each witness, but to all material that provides cost or descriptions information applicable to the affiliate cost category supported by each witness.
- 7-2 For each work order page set out in JSSP-17, please identify the specific witness supporting each work order.
- **7-3 a.)** Please provide the number of electric customers by Xcel subsidiary for December 2004, December 2005, and July 2006.
 - **b.)** If the subsidiary has operations in more than one state, please provide the information in (a) above by state.
- 7-4 Please provide the number of employees by Xcel subsidiary for December 2004, and December 2005, and July 2006.
- 7-5 Please provide the number of gas customers by Xcel subsidiary for December 2004, December 2005, and July 2006.

RFIs Nos. 7-6 - 7-20 Relating to Prefiled Testimony of Michael Carlson

- **7-6 a.**) Please provide complete copies of all documents and studies which provide the historical baselines and corporate financial guidelines which were used to set 2005 Business Systems performance metrics.
 - **b.**) Please provide all calculations and supporting documentations which shows how the 2005 metrics were derived from historical baselines and corporate financial guidelines.
- 7-7 a.) Please explain how the continued utilization of historical baselines can or will lead to improved business systems performance.
 - **b.)** Does SPS believe there is any merit to increasing performance levels or target levels for its business systems organization? Why or why not?
 - c.) Please provide 2003 and 2004 target numbers for each KPI shown on p. 12 of your testimony.
 - **d.**) Please explain why SPS or XES believes a 72% average customer satisfaction level is an appropriate performance target.

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- 7-8 a.) Has SPS provided any detailed breakdown of business system IT costs into specific service categories, project categories, etc?
 - **b.**) If so, please identify each schedule, exhibit, or workpaper or any other material which shows the breakdown by direct and allocated charges.
 - **c.**) If not, please provide this material.
- 7-9 a.) Has SPS provided any schedules or workpapers that provide the information requested in No. 7-8 above on a subsidiary by subsidiary basis?
 - **b.**) If so, please identify each schedule, exhibit or workpaper.
 - **c.)** If not, please provide this material.
- 7-10 a.) Regarding 7-8 above, indicate which IT costs have been outsourced.
 - **b.**) Please identify each schedule, exhibit, or workpaper in the RFP which identifies outsourced costs.
 - c.) What is the total amount of IT charges to SPS during the test year that has been outsourced?
- 7-11 a.) Please provide a breakdown of business systems finance costs charges to SPS during the test using the cost categories discussed on p. 22, lines 5-14.
 - **b.**) Please separate each cost category by direct and indirect charges.
 - c.) Please provide the information in (a) and (b) above for each Xcel Energy subsidiary.
- 7-12 a.) Please describe in greater detail the function and purpose of process design.
 - **b.)** Please describe each and every process design project and service that was provided to SPS during the test year and which the Company is requesting recovery in this rate case.
 - c.) Please provide the amount charged to SPS for each project, service, etc. by direct and allocated charges.

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- **7-13** Please provide detailed information regarding the function and purpose of the below listed business systems finance costs:
 - **a.)** IT governance standards and supporting function what is an IT governance standard and what is a supporting function?
 - **b.**) Compliance related services what are these specific services and why are they necessary?
 - c.) Control identification/management define and describe what this is.
 - **d.**) Other financial management related services please describe all services.
 - e.) Project office fees describe what these are and how are they related to IBM?
- **7-14 a.)** Please explain why business systems finance provides mainframe administration and support, IT contract management and IT governance standards.
 - **b.**) Why are these costs not included in the IT operations group during the test year?
- 7-15 What is "hearing conservation" (p. 28, line 8 of testimony)?
- **7-16 a)** Are the business systems communications services primarily related to Xcel Energy internal communications functions?
 - **b.**) Please explain your response to (a) above.
 - c.) What is the total amount of business systems communication costs charged to SPS during the test year, by direct and allocated charges?
 - **d.**) Provide the information in (c) above for each Xcel subsidiary.
- 7-17 a.) Please identify and describe each utility innovation pilot project during the test year that was charged to SPS during the test year.
 - **b.)** Please show the direct and allocated charges for utility innovation services to each Xcel subsidiary during the test year.
- 7-18 What is the total amount of process design services charged to each Xcel subsidiary during the test year, by direct and allocated charges?
- 7-19 Please show all charges for learning services to each Xcel subsidiary for the test year.
- **7-20** For each of the services discussed in your testimony, please provide the specific allocator used for indirect charges.

July 28, 2006

Respectfully submitted,

Suzi Ray McClellan Public Counsel State Bar No. 16607620

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CERTIFICATE OF SERVICE

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I certify that today, July 28, 2006, I served a true copy of the foregoing Office of Public Utility Counsel's Seventh Request for Information To Southwestern Public Service Company on all parties of record via United States First-Class Mail, hand-delivery or facsimile.

Mark Gladney