



Control Number: 32766



Item Number: 493

Addendum StartPage: 0

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

<b>APPLICATION OF SOUTHWESTERN</b>	§	
<b>PUBLIC SERVICE COMPANY FOR:</b>	§	
<b>(1) AUTHORITY TO CHANGE</b>	§	<b>BEFORE THE STATE OFFICE</b>
<b>RATES; (2) RECONCILIATION OF</b>	§	
<b>ITS FUEL COSTS FOR 2004 AND</b>	§	
<b>2005; (3) AUTHORITY TO REVISE</b>	§	<b>OF</b>
<b>THE SEMI-ANNUAL FORMULAE</b>	§	
<b>ORIGINALLY APPROVED IN</b>	§	
<b>DOCKET NO. 27751 USED TO</b>	§	<b>ADMINISTRATIVE HEARINGS</b>
<b>ADJUST ITS FUEL FACTORS; AND</b>	§	
<b>(4) RELATED RELIEF</b>	§	

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S  
RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
TWENTY-FIRST REQUEST FOR INFORMATION  
QUESTION NOS. 21-1 THROUGH 21-9  
(Filename: 10K1.doc; Total Pages: 14)**

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<b>I. WRITTEN RESPONSES .....</b>	<b>2</b>
<b>II. INSPECTIONS. ....</b>	<b>3</b>
<b>RESPONSES .....</b>	<b>5</b>
QUESTION NO. 21-1:.....	5
QUESTION NO. 21-2:.....	6
QUESTION NO. 21-3:.....	7
QUESTION NO. 21-4:.....	8
QUESTION NO. 21-5:.....	9
QUESTION NO. 21-6:.....	10
QUESTION NO. 21-7:.....	11
QUESTION NO. 21-8:.....	12
QUESTION NO. 21-9:.....	13
<b>CERTIFICATE OF SERVICE .....</b>	<b>14</b>

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RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S  
TWENTY-FIRST REQUEST FOR INFORMATION  
QUESTION NOS. 21-1 THROUGH 21-9

Southwestern Public Service Company (SPS) files this response to Office of Public Utility Counsel's (OPC) Twenty-First Request for Information.

I. WRITTEN RESPONSES

SPS's written responses to OPC's Twenty-First Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. SPS's responses are made in the spirit of cooperation without waiving SPS's right to contest the admissibility of any of these matters at hearing. Pursuant to P.U.C. PROC. R. 22.144(c)(2)(A), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When SPS provides certain information sought by the request while objecting to the provision of other information, it does so without prejudice to its objection in the interests of narrowing discovery disputes pursuant to P.U.C. PROC.

R. 22.144(d)(5). Pursuant to P.U.C. PROC. R. 22.144(c)(2)(F), SPS stipulates that its responses may be treated by all parties as if they were made under oath.

## II. INSPECTIONS.

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is VOLUMINOUS and, pursuant to P.U.C. PROC. R. 22.144(h)(2), the attachment will be made available for inspection at SPS's voluminous room at 1150 Capitol Center, 919 Congress Ave., Austin, Texas 78701, telephone number (512) 476-7137. If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either CONFIDENTIAL or HIGHLY SENSITIVE as appropriate under the protective order. Highly sensitive responses will be made available for inspection at SPS's voluminous room, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to Commission Procedural Rule 22.144(h)(3), the attachment will be available for inspection at its usual repository, SPS's offices in Amarillo, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48 hours' notice of their intent by contacting Steven D. Arnold of Hinkle, Hensley, Shanor & Martin, L.L.P., 1150 Capitol Center, 919 Congress Ave., Austin, Texas 78701; telephone number (512) 476-7137; facsimile transmission number (512) 476-7146. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

**XCEL ENERGY**

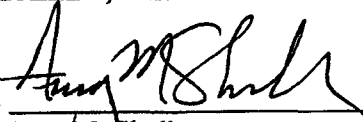
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Respectfully submitted,

**HINKLE, HENSLEY, SHANOR  
& MARTIN, L.L.P.**

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**ATTORNEYS FOR SOUTHWESTERN  
PUBLIC SERVICE COMPANY**

## RESPONSES

### QUESTION NO. 21-1:

Please identify each witness whose testimony provides support for customer costs that are included in the customer charge component of your rates.

### RESPONSE:

Daniel J. James, James C. Jordan and James M. Elliott.

Preparer: Daniel J. James

Sponsor: Daniel J. James, James C. Jordan, James M. Elliott

**QUESTION NO. 21-2:**

For each customer [*sic. witness*] identified in No. 21-1, please identify the page numbers including the bate stamp and including the workpaper and schedules where customer costs are addressed.

**RESPONSE:**

Daniel J. James: Volume RD-1, Bates Stamp pages 15-16, 69-72.

James C. Jordan: Volume RD-1, Bates Stamp pages 142-144; Volume SCH-8, Bates Stamp pages 56- 60, 78-93, 104-113.

James M. Elliott: Volume SCH-6, Bates Stamp pages 273-283.

Preparer: Daniel J. James

Sponsor: Daniel J. James, James C. Jordan, James M. Elliott

**QUESTION NO. 21-3:**

What is the aggregate level of customer costs SPS has included in its rate filing?

**RESPONSE:**

The total customer related revenue requirement is \$55,794,739.

Preparer: Daniel J. James  
Sponsor: James C. Jordan



**QUESTION NO. 21-4:**

What was the level of aggregate customer casts [*sic.* costs] charged to SPS for each year of the last five years?

**RESPONSE:**

SPS has not performed a functionalized cost of service study for the time periods requested, which would be required to respond to this question.

Preparer: Daniel J. James

Sponsor: Daniel J. James

**QUESTION NO. 21-5:**

If the level of aggregate customer costs charged to SPS has increased greater than inflation over the past five years, please explain the increase.

**RESPONSE:**

Refer to SPS's response to Question No. OPC21-4 above.

Preparer: Daniel J. James  
Sponsor: Daniel J. James

**QUESTION NO. 21-6:**

Has the aggregate level of customer costs charged SPS increased as a result of your sale of your retail operations in Kansas and Oklahoma?

**RESPONSE:**

No.

Preparer: David T. Hudson  
Sponsor: David T. Hudson

**QUESTION NO. 21-7:**

If the answer to No. 21-6 is yes, please explain the increase.

**RESPONSE:**

Not applicable.

Preparer: David T. Hudson

Sponsor: David T. Hudson

**QUESTION NO. 21-8:**

Please provide a breakdown of the customer costs by FERC account that are included in the customer charge component of your rates.

**RESPONSE:**

Refer to Schedule P-4 of SPS's Rate Filing Package, Volume SCH-8, Bates Stamp pages 78-93, as corrected in SPS's Second Errata Filing, filed on September 25, 2006.

Preparer: Daniel J. James  
Sponsor: James C. Jordan

**QUESTION NO. 21-9:**

With reference to p. 72 of SPS witness Hudson's testimony, please provide the total wholesale Firm Power and Interruptible Capacity Sales (KWH) for each year since your last base rate case up to year 2000.

**RESPONSE:**

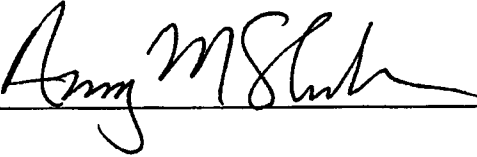
Wholesale Firm and Interruptible Sales from SPS's FERC Form 1

	Firm MWh	Interruptible MWh
1994	6,012,766	109,095
1995	6,185,326	21,124
1996	6,241,617	319,818
1997	6,112,525	729,837
1998	6,952,714	845,914
1999	6,388,568	885,535
2000	7,884,523	619,908

Preparer: James M. Elliott  
Sponsor: James M. Elliott

**Certificate of Service**

I certify that on the 2<sup>nd</sup> day of October 2006, a true and correct copy of the foregoing instrument was served on all parties of record by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

  
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