



Control Number: 35763



Item Number: 219

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DOCKET NO. 35763

**APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY §
AUTHORITY TO CHANGE RATES, TO §
RECONCILE FUEL AND PURCHASED §
POWER COSTS FOR 2006 AND 2007 AND §
TO PROVIDE A CREDIT FOR FUEL §
COST SAVINGS §**

**PUBLIC UTILITY COMMISSION
OF TEXAS**

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**OFFICE OF PUBLIC UTILITY COUNSEL'S SIXTH REQUEST FOR
INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY**

COMES NOW, the Office of Public Utility Counsel ("OPUC"), and files this, its Sixth 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 question 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 the Southwestern Public Service Company and its affiliates;
- (2) "Applicant" refers to SPS as defined above;
- (4) "You," "yours" and "your" refer to SPS (as defined above), including its directors, officers, employees, consultants, agents, and attorneys.
- (5) "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 (e-

mail), 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.

The following RFI No.6-1 is directed to Michael Connelly.

- 6-1** a) Please list all state, local and federal regulatory dockets, projects and other regulatory-related activities that were included as an expense under the legal services or VP-General Counsel classes of service for the test year.
- b) For each of the items listed in (a) above, please explain how SPS Texas retail ratepayers benefit from the expenditure.

The following RFI Nos. 6-2 to 6-5 are directed to David Eves.

- 6-2** a) Please update footnote 1 on p. 13 for 2007.
- b) Regarding (a) above, please provide a separate calculation for the gas utility business.
- c) Please calculate the percent of 2007 Xcel revenues accounted for by the nonregulated, electric, and gas businesses (separately stated).
- 6-3** a) Regarding the \$270,000 of costs related to Commercial and Industrial Account Management, please identify all work order numbers associated with this function, as well as all charges to SPS during the last year by work order.
- b) Has the Company removed the \$270,000 as a test year affiliate expense? Explain why or why not and provide all workpapers and documents supporting your response.
- 6-4** What is the average test year salary paid to the 111 staffers comprising the utility president department?
- 6-5** Please explain why 89% of total XES charges to non-SPS companies for utility president are direct billed, whereas only 62.40% of total XES charges to SPS for utility president are direct billed.

The following RFI Nos. 6-6 to 6-8 are directed to Kenneth Floyd.

- 6-6** a) Please identify all direct charged and allocated work orders that are applicable to SPS customer care business support operations from Attachment KRF-RR-C, the title of the work order, and requested recovery amount by work order.
- b) Please provide the information in (a) above for each non-SPS affiliate.
- 6-7** Please provide the total amount requested for recovery during the test year for the following categories of expense shown in Attachment KRF-RR-B.
- a) 431312 CC-B-Mass Mkt Billing - S SPS
- b) 433512 CC Resource Mgmt – SPS

- c) 435012 CC Dir Cust Care Bus Ops – SPS
- d) 435512 CC Cust Care Bus Analysis – SPS

6-8 Please provide a detailed description of the purpose of the expenses for each of the work orders in 6-7 above.

The following RFI Nos. 6-9 to 6-18 are directed to Cathy Hart.

- 6-9**
 - a) Has SPS removed all labor and other overheads (including 910 overheads) associated with the Xcel Foundation? Explain your response.
 - b) Please provide the associated labor and other overheads from (a) above.
 - c) Provide all supporting workpapers and documents supporting your responses to (a) and (b) above.
- 6-10** Please provide the direct charged and allocated work orders applicable to the following services in the corporate communications department, the title of the work order, and the requested recovery amount for SPS by work order.
 - a) Client Services
 - b) Employee Communications
 - c) Executive and Investor Communications
 - d) Media Relations
 - e) Web Content Development
- 6-11** Please provide the information requested in #6-10 above for each non-SPS affiliate.
- 6-12** Please provide a listing of all corporate-owned aircraft flights departing from Amarillo, Lubbock, Hobbs, and Roswell during the test year (separate information for each city).
- 6-13** Please provide a calculation of the average cost per flight leg (fixed and variable separately stated) during the test year for corporate-owned aircraft.
- 6-14** Please provide the most recent cost/benefit analysis relevant to Xcel's utilization of corporate-owned jet travel compared to the utilization of commercial jet travel.
- 6-15**
 - a) Please explain the methodology used to calculate the \$526,942 of test year aviation costs charged to SPS.
 - b) Provide all workpapers and documents supporting your response to (a).

6-16 Please explain the difference between the property services class of service and the services charged or provided under work order 910.

6-17 Please provide the total amount requested for recovery during the test year for the following categories of expense shown in Attachment CJN-RR-B.

| | | |
|-----|--------|------------------------------------|
| a) | 200407 | ES Corporate SPS A&G |
| b) | 463036 | MKT Windsorce Mktg SPS |
| c) | 499804 | MKT Mngd Mkts SPS |
| d) | 499904 | Mkt Cons Mkts SPS |
| e) | 801366 | UP Elec Dist Oper DEOSAE |
| f) | 807699 | Transn SPS Fees SS ET A&G |
| g) | 999383 | BS SPS Info Tech |
| h) | 999203 | CE SPS Exec Mgmt |
| i) | 200407 | ES Corporate SPS A&G |
| j) | 240032 | ES Corporate SPS Steam FERC 500 |
| k) | 240033 | ES Corporate SPS Steam FERC 501 |
| l) | 240036 | ES Corporate SPS Steam FERC 506 |
| m) | 240043 | ES Corporate SPS Steam FERC 514 |
| n) | 240053 | ES Corporate SPS Steam FERC 500 |
| o) | 240853 | ES Celanese Co Gen CT 1 FERC 553 |
| p) | 351010 | CF SPS Admin & Gen Electric |
| q) | 351016 | CF SPS Prop Bk Trdng Support |
| r) | 351017 | CF SPS Gen Book Support |
| s) | 351018 | SPS Trdg Native Hedge Support |
| t) | 351035 | ES Electric Sales |
| u) | 351040 | ES SPS Trading Gen Sales |
| v) | 351041 | ES SPS Power Trading Prop |
| w) | 351045 | ES SPS Fuel Acquisition |
| x) | 351048 | ES SPS Trading Native Hedge |
| y) | 351066 | ES SPS Load Dispatch Reliab |
| z) | 351067 | ES SPS Load Dsptrch Mntr. & Op |
| aa) | 351068 | ES SPS Reliability, PL & Stand |
| bb) | 351080 | RF – SPS Purchase Power – 557 |
| cc) | 351081 | ES SPS Sup – Reg Energy Mkts |
| dd) | 431012 | CC – B – Dir Billing Svcs – SPS CA |
| ee) | 431312 | CC – B – Mass Mkt Billing – S SPS |
| ff) | 431712 | CC – B – C&I Billing – S SPS |
| gg) | 431812 | CC – B – Billing Prod & Svcs – SPS |
| hh) | 433212 | CC – Call Cntr – SPS |
| ii) | 490421 | C&I Acct Mgmt LUB SPS |
| jj) | 498704 | CC General SPS A&G |
| kk) | 499804 | Mkt Mngd Mkts SPS |
| ll) | 499919 | Mkt Cons Mkts SPS |

| | | |
|------|----------|---------------------------------|
| nn) | 500016 | CS Foundation SPS |
| oo) | 500523 | BS SPS |
| pp) | 624153 | GRA SPS E Regulatory Exp – NM |
| qq) | 628450 | GRA SPS Gov K/N/O/T |
| rr) | 628452 | GRA Gov Affairs – NM |
| ss) | 628454 | GRA Gov Affairs – TX |
| tt) | 629450 | GRA SPS Rates & Reg – K/N/O/T |
| uu) | 629452 | GRA SPS Rates & Reg – NM |
| vv) | 807599 | UP SPS SS GNL |
| ww) | 807799 | UP SPS SS ED |
| xx) | 815997 | Facility Attach SPS GD 588 |
| yy) | 889356 | Transm SPS FERC ET 560 |
| zz) | 889357 | Transm SPS FERC ET 566 |
| aaa) | 999004 | NS General – SPS |
| bbb) | 10193288 | TX Fuel Rec 2000-2001 |
| ccc) | 10317402 | Texas Fuel Factor – 2003 |
| ddd) | 10580285 | SPS Resource Plan 2004/2005 |
| eee) | 10756928 | HAR30 – H3 Boiler Overhaul |
| fff) | 10756936 | HAR30 – H3 Turbine Overhaul |
| ggg) | 10756967 | HAR30 – H3 HOP Overhaul |
| hhh) | 10757014 | TUCO INTCHG – STATIC VAR CONTRO |
| iii) | 10849622 | PLX40-Unit 4 Valves Overhaul |
| jjj) | 10851213 | CHC20 – Generator OH Spring 07 |
| kkk) | 9990253 | CF SPS Risk Mgmt |
| lll) | 999283 | NS SPS Corp Strat & Bus Dev |
| mmm) | 999303 | GC NS SPS Legal |
| nnn) | 999313 | GRA SPS Gov Affairs |
| ooo) | 999413 | SC SPS – OPM |

6-18 Please explain the specific purpose of the work orders in #6-17 above.

The following RFI Nos. 6-19 to 6-21 are directed to Richard Blatnik.

6-19 Please provide the total amount requested for recovery during the test year for the following categories of expense shown in attachment RJB-RR-B.

| | | |
|----|--------|----------------------------|
| a) | 801312 | UP SPS FERC #588 |
| b) | 801313 | UP SPS FERC #586 |
| c) | 801321 | UP SPS FERC #595 |
| d) | 801323 | UP SPS FERC #597 |
| e) | 801366 | UP Elec Dist Oper DEOSAE |
| f) | 807599 | UP SPS SS Gnl |
| g) | 807795 | UP SPS TX SS ED |
| h) | 807799 | UP SPS SS ED |
| i) | 815997 | Facility Attach SPS ED 588 |

- j) 816509 Bus Dev SPS NU 4171
- k) 889356 Transm SPS FERC ET 560
- l) 999413 SC SPS – OPM

6-20 Please provide a detailed description of the purpose of the expense for each of the work orders in #6-19 above.

6-21 Regarding RJB – RR-3, please provide a spreadsheet for Texas capital additions only.

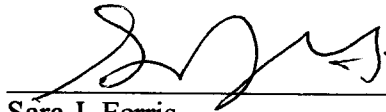
The following RFI Nos. 6-22 to 6-28 are directed to Teresa S. Madden.

- 6-22** Please provide the total amount requested for recovery during the test year for 99904 NS General (see Attachment TSM-RR-B), as well as a detailed description of the purpose of the work order.
- 6-23** Please explain in detail the difference between the Investor Relations class of service and Shareholder Relations class of service.
- 6-24** Please explain why 66% of the total CF controller charges to SPS were direct charged during the test year, whereas 52% of the total charges to non-SPS subsidiaries were direct charged.
- 6-25** Please explain why 32% of the total environmental policy charges to SPS were direct charged during the test year, whereas 53% of the total charges to non-SPS subsidiaries were direct charged.
- 6-26** Please explain the reason for the \$254,350 direct charge for investor relations to a non-SPS subsidiary.
- 6-27** Please explain why 43% of total chief executive officer charges to SPS were direct charged during the test year, whereas 55% of the total charges to non-SPS subsidiaries were direct charged.
- 6-28** Please explain why 30% of the total CF Treasurer charges to SPS were direct charged, whereas 6% of total charges to non-SPS subsidiaries were direct charged.

Dated: August 5, 2008

Respectfully submitted,

Don Ballard
Public Counsel
State Bar No. 00790259

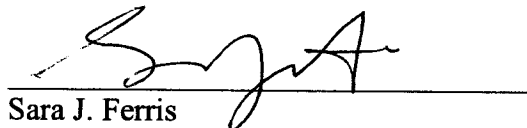


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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE
PUC DOCKET NO. 35763

I hereby certify that today, August 5, 2008, I served a true copy of the Office of Public Utility Counsel's Sixth RFI to Southwestern Public Service Company on all parties of record via hand delivery, facsimile, or United States First-Class Mail.



Sara J. Ferris