



Control Number: 42004



Item Number: 141

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SOAH DOCKET NO. 473-14-1665
PUC DOCKET NO. 42004

APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY FOR §
AUTHORITY TO CHANGE RATES AND §
TO RECONCILE FUEL AND PURCHASED §
POWER COSTS FOR THE PERIOD §
JULY 1, 2012 THROUGH JUNE 30, 2013 §

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PUBLIC UTILITIES COMMISSION
BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

ALLIANCE OF XCEL MUNICIPALITIES'
EIGHTEENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY

Alliance of Xcel Municipalities ("AXM") Eighteenth Set of Requests for Information ("RFIs") to Southwestern Public Service Company ("SPS") is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera & Boyle, PLLC at 816 Congress Avenue, Suite 1250, Austin, Texas 78701, within twenty (20) days of service hereof or no later than **March 12, 2014**. Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

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 of any other media, including, but not limited to, 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.
4. The term "communication" includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the

requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SPS.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, 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 RFI 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 RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SPS considers any RFI 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

SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.

6. 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.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SPS receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA & BOYLE, PLLC
816 Congress Avenue, Suite 1250
Austin, Texas 78701
(512) 474-1492
(512) 474-2507 FAX

By Felipe Alonso III by permission
M. Wood

Alfred R. Herrera
State Bar No. 09529600

Felipe Alonso III
State Bar No. 24045400

Sean Farrell
State Bar No. 24042676

Jason Wakefield
State Bar No. 00789849

**ATTORNEYS FOR ALLIANCE OF XCEL
MUNICIPALITIES**

CERTIFICATE OF SERVICE

I certify that I have served a copy of AXM's Eighteenth Set of Requests for Information to SPS upon all known parties of record by fax and/or first class mail on this the 20th day of February 2014.

Felipe Alonso III by permission
Felipe Alonso III M. Wood

EXHIBIT A

**SOAH DOCKET NO. 473-14-1665
PUC DOCKET NO. 42004**

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES AND TO RECONCILE FUEL AND PURCHASED POWER COSTS FOR THE PERIOD JULY 1, 2012 THROUGH JUNE 30, 2013	§ § § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**ALLIANCE OF XCEL MUNICIPALITIES'
EIGHTEENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

- 18-1. [Wheeling Expense] Reference the response to AXM RFI 2-10 addressing, in part, Tri-County Electric Cooperative, Inc.'s rate filed for SPP Zone 11. Please answer/provide the following:
- a. Please immediately update this response for any changes in the status of FERC hearings/rehearings regarding any Tri-County matter discussed in the noted response throughout the pendency of this proceeding.
 - b. Provide SPS's best estimate of the timeline for remaining events in each proceeding and issuance of a final FERC order in each proceeding discussed in the noted response.
 - c. Reference SPS's adjustment for Tri-County Schedule 9 Charges. If the Initial Decision for Phase 1 of FERC Docket ER12-959 issued on April 22, 2013 is adopted without exception by FERC in a final order, will any portion of the amount reflected in the noted adjustment ever be required to be paid by SPS without being subject to full refund? Explain any answer given, providing as may be applicable, a break out of the portion that would still need to be paid by SPS versus the amounts that would no longer apply to SPS.
- 18-2. Are there any conceptual differences in the approach to developing Schedule 11 Base Plan Upgrade wheeling expenses in this current Texas retail docket versus the prior SPS retail rate case Docket 40824? If yes, please discuss/describe any difference and calculate the retail revenue requirement impact of the proposed change in approach. All difference should be delineated, discussed/described and quantified, including without limitation, differences that may due to:

- a. Investment cutoff periods for transmission investment assigned exclusively to SPS versus regional SPP investment (i.e., historic test year end versus following calendar year budgeted investment amounts).
 - b. Cost of capital employed – including FERC versus Texas retail requested WACC.
 - c. Load ratio measurement/development period.
- 18-3. Are there any conceptual differences in the approach to developing Schedule 11 Base Plan Upgrade wheeling revenues being revenue credited within the Texas retail jurisdictional cost of service in this current Texas retail docket versus the prior SPS retail rate case Docket 40824? If yes, please discuss/describe any difference and calculate the retail revenue requirement impact of the proposed change in approach. All difference should be delineated, discussed/described and quantified, including without limitation, differences that may due to:
- a. Investment cutoff periods for transmission investment assigned exclusively to SPS versus regional SPP investment (i.e., historic test year end versus following calendar year budgeted investment amounts).
 - b. Cost of capital employed – including FERC versus Texas retail requested WACC.
 - c. Load ratio measurement/development period.
- 18-4. To the extent SPS may have recorded any adjustments during the period July 2012 to date to reflect the true-up of costs originally billed through an SPP tariff on a forecast basis that were subsequently true-up for actual costs:
- a. Discuss/describe the service that was originally included in SPP rate development on a forecast basis that was subsequently true up for actual costs/revenues/billing determinants.
 - b. Provide the adjustment recorded by date and FERC account.
- 18-5. To the extent that SPS may have recorded accounting entries during the period beginning July 2012 to date to reflect the receipt of refunds received from SPP or any SPP member for amounts initially paid for services pursuant to tariffs that were initially filed subject to true-up/refund pending final resolution of a contested rate, please:
- a. Discuss/describe the service provided for which SPS received a full or partial refund.
 - b. Describe the contested rate and the resolution eventually ordered.
 - c. Provide the adjustment recorded by date and FERC account.