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

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO ALLIANCE OF XCEL MUNICIPALITIES'
TENTH REQUEST FOR INFORMATION
QUESTION NOS. 10-1 THROUGH 10-29**

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**SOAH DOCKET NO. 473-14-1665
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<u>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</u>	§ BEFORE THE STATE OFFICE § OF § ADMINISTRATIVE HEARINGS
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**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO ALLIANCE OF XCEL MUNICIPALITIES'
TENTH REQUEST FOR INFORMATION
QUESTION NOS. 10-1 THROUGH 10-29**

Southwestern Public Service Company ("SPS") files this response to Alliance of Xcel Municipalities' ("AXM") Tenth Request for Information Question Nos. 10-1 through 10-29.

I. WRITTEN RESPONSES

SPS's written responses to AXM Tenth 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. In accordance with 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 under P.U.C. PROC.

R. 22.144(d)(5). As allowed under 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 (“(V)”) and, pursuant to P.U.C. PROC. R. 22.144(h)(2), the exhibit will be made available for inspection at SPS’s voluminous room at 401 Congress Avenue, Suite 2100, Austin, Texas 78701; telephone number (512) 370-2867. Voluminous exhibits will also be provided on CD to any requesting party. Further, SPS will upload all voluminous documents, along with all native files for review to SPS’s Sharepoint website:

<https://collaboration.xcelenergy.com/sps/SPSFinalRateCases/default.aspx>

All parties will be provided a log in id number at time of intervention to access the Sharepoint website.

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 (“CONF”) or highly Sensitive (“HS”) as appropriate under the protective order. Confidential and Highly Sensitive materials will be served on all parties that have signed and filed the certification under the protective order entered in this docket. Confidential and Highly Sensitive responsive documents will also 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 P.U.C. PROC. R. 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 hour notice of their intent by contacting Ron Moss of Winstead P.C., 401 Congress Avenue, Suite 2100, Austin, Texas 78701; telephone number (512) 370-2867; facsimile transmission number (512) 370-2850; email address rhmoss@winstead.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

Respectfully submitted,

XCEL ENERGY SERVICES INC.

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BY: 
ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. AXM 10-1:

[Texas Gross Margin Tax] Please provide the calculation, including referenced starting input values, of the “adjusted” Texas Gross Margin Tax amount reflected on Attachment KMK-RR-1, page 212 (\$3,768,742).

RESPONSE:

The Gross Margin Tax adjustment of \$3,768,742 is made up of the sum of the per book gross margin tax reclassified from income taxes to taxes other than income and the pro forma adjustment of \$320,774. Please refer to the file, Texas Gross Margin Gross Up G-9 123013.xls, on the Native CD of the Rate Filing Package, for the workpaper showing the calculation of the pro forma adjustment to the Gross Margin Tax.

Preparer: Arthur P. Freitas
Sponsor: Kathy McNulty Kropp

QUESTION NO. AXM 10-2:

[Texas Gross Margin Tax] Please provide complete copies of the Texas Gross Margin Tax return that was most recently filed by the Company that includes SPS taxable income, including all workpapers associated with such return. In addition, explain whether/how Texas Gross Margin tax amounts are assigned or allocated among Xcel businesses on the Company's books, given the impact of apportionment factors and any applicable tax credits or other tax return inputs.

RESPONSE:

Please refer to Exhibit SPS-Staff 1-33(CONF) for the most recently filed return. Please also refer to Exhibit SPS-AXM 10-2(CONF) for the return workpapers that include the apportionment factors and allocations.

Preparer: Paul Boger
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-3:

[Cash Working Capital] For the period January 2012 to date, please provide:

- a. Texas Gross Margin (Franchise) Tax Expense accrued by FERC subaccounts by month.
- b. Monthly activities within designated Accounts Payable and/or Prepayments subaccounts (or other designated balance sheet subaccounts) that capture the expense accruals and payments related to Texas Gross Margin (Franchise) Tax, as well as resulting end-of-month balance sheet account positions.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-3.

Preparer: Paul Boger
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-4:

[Meter Upgrades] During the period beginning January 2013 to date, has Xcel/SPS upgraded/modified/further automated its retail customers' meters, meter reading equipment or billing systems or equipment? If yes:

- a. Provide studies/analyses underlying decisions to upgrade/replace/modify/further automate equipment or systems.
- b. Note date(s) such equipment changes/replacements/upgrades occurred. As necessary, discuss/describe any phase-in processes for each replacement/modification/upgrade.
- c. Provide the costs incurred by month by FERC account for each upgrade/replacement/ modification.
- d. As applicable, provided estimated cost savings achieved by month as a result of any upgrade/replacement/modification/automation.

RESPONSE:

During the period January 2013 to present, SPS has not implemented a large scale upgrade or modification to its retail customer meters, meter reading equipment, or billing systems or equipment. SPS, however, has installed remote-read meters at approximately 30 premise locations within its service area. SPS automated the meters at these premises due to instances of dog bites and other hazards to SPS's meter reading personnel and the number of monthly meter reads based upon estimates. The marginal increase in meter cost is about \$17.50 per meter, or about \$525.00 in total for the 30 meters.

Preparer: William P. Davis
Sponsor: S. Michelle Edwards

QUESTION NO. AXM 10-5:

[Meter Upgrades] Does Xcel/SPS have any plans to upgrade/modify/further automate its retail customers' meters, meter reading equipment or billing systems/equipment that have not yet been implemented? If yes, please provide:

- a. Any studies/analyses underlying such plans.
- b. Estimated phase-in of any such plans, noting start and completion dates, and expenditures forecasted by month by FERC account throughout the roll-out period.

RESPONSE:

No, other than isolated incidents of installing remote-read meters at specific premises to prevent hazards to SPS's meter reading personnel. Please refer to SPS's response to Question No. AXM 10-4.

Preparer: William P. Davis
Sponsor: S. Michelle Edwards

QUESTION NO. AXM 10-6:

[Uncollectible Accounts Expense] Please provide the recorded amounts of monthly uncollectible expense accruals, charge offs, recoveries and the uncollectible reserve balances for SPS's Texas retail electric operations for the period January 2013 to date and budgeted for years 2013 and 2014. Also provide the related revenues (actual for historic periods requested, and budgeted amounts for budget years requested) to which uncollectible accounts are correlated.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-6.

Preparer: Nathan Young
Sponsors: S. Michelle Edwards, Janet S. Schmidt-Petree

QUESTION NO. AXM 10-7:

[Uncollectible Accounts Expense] Reference page 1 of Schedule G-3 addressing Bad Debt Expense accounting:

- a. Please provide the uncollectible percentage estimates that have been applied to Accounts Receivable balances for the period January 2011 to date.
- b. Please provide any determinations made or modifications implemented as a result of the annual review of uncollectible percentage estimates for the past three years.

RESPONSE:

- a. Please refer to Exhibit SPS-AXM 10-7. A Reserve Study is performed annually and is used to update the uncollectible percentage estimates each year. The percentages are used for a 12-month period from May through April. The Reserve Study estimates percentages by customer type, active/inactive and non skip/skip trace accounts. An explanation for these terms is provided below:

Active Non Skip Trace:

Debt for active customers who are receiving electric and/or gas service as of the Accounts Receivable ("AR") date.

Active Skip Trace:

Debt for active customers who are receiving electric and/or gas service as of the AR date that has been transferred from an inactive, unpaid final customer account.

Inactive (Final) Non Skip Trace:

Customers who have been sent a final bill and no longer receive utility services.

Inactive (Final) Skip Trace:

Customers who have been sent a final bill and are no longer active at any premise and the debt originated as a transfer from an inactive, unpaid final account.

Customer Type – an example of "Other" is a state or government customer.

- b. Please refer to Exhibit SPS-AXM 10-7. The uncollectible percentage estimates are developed from annual Reserve Studies in which historical customer payment behavior data is analyzed and contributing factors such as the sales forecast and underlying fuel forecast, any changes in credit policy, and external considerations such as the economy are considered. The most recent Reserve Study was implemented in June 2013. Based on the results of the Study, new uncollectible percentage estimates were applied as of May 2013. Results from the annual study are

used for a 12-month period May through April, as indicated in Exhibit SPS-AXM 10-7.

Preparer: Nathan Young
Sponsors: S. Michelle Edwards, Janet S. Schmidt-Petree

QUESTION NO. AXM 10-8:

[Uncollectible Accounts Expense] Reference pages 2 and 3 of Schedule G-3 that sets forth total revenues, net write-offs and uncollectibles expense for the period January 2008 through June 2013. Please discuss, describe and as may be applicable quantify, changes in events, conditions, processes and/or procedures that are believed to be contributing to a lowering of Uncollectible Accounts Expense both in terms of nominal dollars as well as a percentage of billed revenues.

RESPONSE:

SPS Bad Debt Expense Trend (\$ millions)

	2008	2009	2010	2011	2012	2013
Bad Debt Expense	\$4.00	\$3.13	\$3.56	\$3.21	\$2.87	\$3.22
Billed Revenue	\$1,263	\$980	\$1,032	\$1,067	\$1,007	\$1,120
Bad Debt Ratio	0.32%	0.32%	0.35%	0.30%	0.29%	0.29%

The table above shows that SPS's bad debt expense has improved since 2008. The decline seen in the early years is largely a result of declining revenue. Other factors contributing to the decline in expense are that customers are paying faster, which reduces the aging of arrears, and, to a much lesser extent, low-income energy assistance programs are helping customers pay. In addition, steps have been taken within the Customer Care organization to help reduce bad debt expense, including:

- a. Targeted collection of large commercial accounts and focused outreach to newly delinquent customers has improved the quality of overall accounts receivable, and lowered bankruptcy write-off;
- b. Improved collection efforts associated with skip-traced accounts (past-due balances from previous accounts that can be traced back to current customers) and inactive accounts;
- c. Close monitoring of commercial accounts and industry trends and working to keep these customers as current as possible;
- d. Implementation of collection agency management practices to help improve collections from customers whose debt had previously been written-off; and

- e. Contacting delinquent customers more consistently and frequently, using several methods including outbound dialing and notices.

Additionally, employees across the Customer Care organization have been given training to ensure they understand what bad debt is and how their efforts to reduce the level of bad debts can directly help to reduce the overall level of bad debt for the benefit of all customers.

Preparer: Nathan Young

Sponsors: S. Michelle Edwards, Janet S. Schmidt-Petree

QUESTION NO. AXM 10-9:

[SPP Charges Under the Integrated Market Place] Reference Attachment WAG-FR-2 to William Grant's testimony (Fuel Reconciliation Phase). Will any of the SPP charges incurred under the operations of the Integrated Market Place that SPS will end up paying be recovered in base rates rather than tracked fuel rates? If yes,

- a. State the service/charge.
- b. Discuss the reasons why such service/charge is most properly or legally considered a base rate item.
- c. Provide the adjusted pro forma level of such expense level being proposed in this proceeding, providing all support and spreadsheet calculations underlying such amounts.

RESPONSE:

No. SPS is proposing to recover all SPP Integrated Marketplace charge types through fuel.

Preparer: William A. Grant
Sponsor: William A. Grant

QUESTION NO. AXM 10-10:

[SPP Charges Under the Integrated Market Place] Reference Attachment WAG-FR-2 to William Grant's testimony (Fuel Reconciliation Phase). To the extent that SPS is expected to be a recipient of revenues from other SPP members for any services listed, please:

- a. Identify each such category of service/receipt of revenues.
- b. Note whether such receipts/revenues will be considered a base rate or fuel reconciliation component, and the propriety/legality for such treatment.
- c. To the extent that any receipts/revenues identified are expected to be considered in base rate development, provide the adjusted pro forma level of such receipts/revenues being proposed in this proceeding, providing all support and spreadsheet calculations underlying such amounts.

RESPONSE:

For clarification, SPS will not receive revenues from other SPP members. Instead SPS will receive revenues from the SPP.

- a.-b. As noted on page 17 of the Direct Testimony of William A. Grant-Fuel Reconciliation, SPS can also be a net seller under the SPP Integrated Marketplace. (Vol. FR1, page 528 of 546). When credits or revenues result from SPS being a net seller, that amount will be credited to eligible fuel. When SPS is a net purchaser, that amount will be included in eligible fuel expense. The charge types under which credits could result are identified in Attachment WAG-FR-2.
- c. Not applicable.

Preparer: Arthur P. Freitas
Sponsors: Arthur P. Freitas; William A. Grant

QUESTION NO. AXM 10-11:

[Property Tax Expense] Please provide actual property tax expense accruals by taxing jurisdiction by month for the period January 2012 to date, breaking out for applicable months any true-up adjustments recognized as actual tax bills or other property-tax related information becomes available causing a need to revise prior month's estimates.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-11.

Preparer: Paul Simon
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-12:

[Affiliate Transactions] Reference pages 21 through 28 of Douglas Benevento's testimony. Regarding the Federal Affairs Class of Service, please provide the following:

- a. Complete job descriptions for the four employees in the department.
- b. Sample work products of handouts to regulatory agencies such as the FERC and EPA, prepared during the test year that were used in meetings with such noted agencies.
- c. Sample non-lobbying work products of handouts and presentations prepared during the test year that were given to elected and governmental officials that were responsive to inquiries.
- d. Sample work products of handouts and presentations prepared during the test year that were used when interfacing with trade associations to assist in understanding and shaping policy issues of importance to SPS.

RESPONSE:

a. **Vice President**

Direct and manage Xcel Energy Federal Affairs office, including responsibility for budget, personnel, and carrying out Xcel Energy goals. Plan and execute regulatory and legislative programs to support Xcel Energy's corporate objectives at the federal level. Participate and provide leadership in industry organizations in the best interest of Xcel Energy and its business units. Anticipate and identify emerging issues and trends in the energy industry. Communicate to appropriate internal audiences. Mobilize internal resources for effective response, including the development of inter- and intra-departmental teams for creating public policy and operational priorities in key issues affecting Xcel Energy.

Staff 1 through 3

At the direction of the Vice President, plan and execute regulatory and legislative programs to support Xcel Energy's corporate objectives at the federal level. Participate and provide leadership in industry organizations in the best interest of Xcel Energy and its business units. Anticipate and identify emerging issues and trends in the energy industry. Communicate to appropriate internal audiences. Mobilize internal resources for effective response, including the development of inter- and intra-departmental teams for creating public policy and operational priorities in key issues affecting Xcel Energy.

- b.-d. Please refer to the Exhibit SPS-AXM 10-12 for the requested information. The attached is an example of information prepared and used by the Federal Affairs department across many of its activities. Frequently, there are no handouts used in a presentation or meeting.

Preparer: Douglas H. Benevento
Sponsor: Douglas H. Benevento

QUESTION NO. AXM 10-13:

[Affiliate Transactions] Reference pages 32 through 39 of Douglas Benevento's testimony. Regarding the Public Policy and External Affairs Class of Service, please provide the following:

- a. Complete job descriptions for the three employees in the department.
- b. Sample work product of factual, non-lobbying data and other information regarding federal legislation, regulations and initiatives provided to federal policy makers during the test year.
- c. Sample work products of materials prepared during the test year that accurately present information regarding SPS to consumers and the public.

RESPONSE:

a. **Vice President**

Direct and manage the Public Policy and External Affairs department, including responsibility for budget, personnel, and carrying out Xcel Energy goals. Direct all the policy functions for Xcel Energy. Ensure the alignment and support of corporate policy issues throughout the entire Company. Manage all the political and grassroots programs within the Company.

Analyst

Anticipate, analyze, develop, recommend, and support the advocacy and implementation of Xcel Energy's operating companies' regulatory policies and strategies. Partner with operating companies in policy development and coordinating their joint efforts to develop consistent policy positions. Utilize regulatory, policy and subject matter expertise to establish effective policies and strategies in consultation with legislative, regulatory, and subject matter experts throughout Xcel Energy and the broader energy industry. Develop and execute plans to align Xcel Energy's regulatory policies and strategies with Corporate business and investment goals. Identify financial opportunities resulting from innovative use of regulatory, legislative and public policy initiatives.

Staff 1

Direct, lead and manage planning and performance responsibilities for the Federal and State Affairs department of XES. Aggregate public policy strategies across Xcel Energy. Direct development of a coordinated strategy to mitigate public policy risks to the Company. Manage complex policy issues spanning across multiple business

units and which often require new analytic processes to evaluate complex data. Determine business unit strategies, which are exportable to the public policy arena; Lead development of legislative and/or political strategies to enhance Xcel Energy's corporate reputation and simultaneously advance the Company's operational and financial priorities.

Staff 2

Identify and monitor key policies affecting Xcel Energy's ability to achieve strategic objectives and recommend appropriate actions and advocacy campaigns to effect positive outcomes. Determine appropriate policy direction alternatives and develop recommendations for regulatory strategy on issues related to FERC, other federal agencies, regional groups (*e.g.* RTOs), and national regulatory groups (*e.g.* NARUC, EEI). Work closely and collaboratively with internal stakeholders to develop and implement regulatory policies and strategies that support the company's strategic goals and initiatives. Manage Xcel Energy's policy position on rulemakings, critical regulatory proceedings and responses to information requests from FERC and other regulatory agencies and Congress as necessary.

b.-d.

Please refer to the Exhibit SPS-AXM 10-13 for the requested information. The Public Policy and External Affairs department provided input and oversight for this report.

Preparer: Douglas H. Benevento
Sponsor: Douglas H. Benevento

QUESTION NO. AXM 10-14:

[Aviation Costs] Please provide any internally or externally prepared studies, calculations or reports that may have been prepared subsequent to those provided in direct testimony and/or in responses to Request for Information in PUC Docket No. 40824 that assess the feasibility of and/or any economies associated with utilization of corporate owned/leased aircraft rather than utilizing commercial airlines for Xcel Energy/XES/SPS business travel.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-14.

Preparer: Jennie Ator
Sponsor: Danny A. Nygaard

QUESTION NO. AXM 10-15:

[Aviation Costs] Please provide the flight log for each Learjet 45 for the period July 2012 to date.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-15.

Preparer: Jennie Ator
Sponsor: Danny A. Nygaard

QUESTION NO. AXM 10-16:

[Aviation Costs] Please provide any regularly maintained records or summarizing reports that capture the costs and usage of either Learjet 45 – other than the aircraft log, which has been separately requested.

RESPONSE:

Please refer to the Exhibit SPS-AXM 10-16.

Preparer: Jennie Ator
Sponsor: Danny A. Nygaard

QUESTION NO. AXM 10-17:

[Aviation Costs] Reference page 24 of Danny Nygaard's direct testimony. Please confirm that the average all-in corporate aircraft test year cost per one-way passenger trip during the test year was \$1,314 (Total Aviation and Travel Services test year cost of \$4,735,215 divided by 3,604 one-way passenger trips equals \$1,314 per one-way trip). Alternatively, please provide the average all-in corporate aircraft test year cost per passenger trip noting all accounts considered and providing actual calculations undertaken.

RESPONSE:

Confirmed.

Preparer: Jennie Ator
Sponsor: Danny A. Nygaard

QUESTION NO. AXM 10-18:

[Transmission] Please provide a status update of litigation surrounding FERC Docket No. ER 12-959 regarding the rolling in of Tri-County Electric Cooperative's transmission facilities into the annual transmission revenue requirement of SPP Zone 11. If not all elements of the docket have been resolved, please provide a list of remaining unresolved issues, as well as an expected time line of all filings/events through the anticipated termination date of the docket.

RESPONSE:

Please refer to SPS's response to Question No. AXM 2-10. The parties are waiting on the FERC to render a decision on the pending Initial Decision in Phase I of the Tri-County proceeding. SPS cannot provide an expected timeline of when the FERC will issue an Order. If the FERC renders an order upholding the Initial Decision, then Phase II will be moot.

Preparer: Kevin Lewis
Sponsor: David T. Hudson

QUESTION NO. AXM 10-19:

[Electric Storm Damages] Please provide total SPS, and if separately accounted for by retail jurisdiction, SPS Texas jurisdictional electric operations storm damage expense by FERC account for calendar years 2012 and 2013 and for the test year ending June 30, 2013.

RESPONSE:

Total SPS Distribution Electric Storm Damage Expense

FERC 593 – Dist Maintenance of Overhead Lines	Total Company	Texas Retail
2012 Year End Actual	\$363,385	\$315,587
2013 Year End Actual	\$694,310	\$515,220
Test Year Ending June 30, 2013	\$574,906	\$512,076

Preparer: Elizabeth Gauna-Giacomini
Sponsor: Joseph P. Mansur

QUESTION NO. AXM 10-20:

[Vegetation Management] Please provide total SPS, and if separately accounted for by retail jurisdiction, Texas jurisdictional electric operations tree trimming/vegetation management expense by FERC account for calendar years 2012 and 2013 and for the test year ending June 30, 2013.

RESPONSE:

Description	FERC	2012 Year End Actuals	2013 Year End Actuals	Test Year Ending June 30, 2013
Dist Oper Overhead Lines	583	638,696	512,252	497,980
Dist Oper Misc. Expenses	588	25,415	21,373	22,396
Dist Mtc Overhead Lines	593	2,082,404	2,289,737	2,033,493
Dist Mtc Station Equipment	592	103,976	114,920	102,222
Trans Mtc Overhead Lines	571	837,357	906,430	857,189
Trans Mtc Station Equipment	570	91,274	113,037	107,975
	Total	\$3,779,122	\$3,597,749	\$3,621,255

All amounts are total company. SPS does not account for vegetation management by retail jurisdiction.

Preparer: Elizabeth Gauna-Giacomini
Sponsors: Joseph P. Mansur, Kelly A. Bloch

QUESTION NO. AXM 10-21:

[Reserves] To the extent that SPS individually or on an allocated basis as part of Xcel Energy accrues expenses for which reserve accounts are established and reflected on the Xcel Energy-consolidated balance sheet or SPS's standalone balance sheet (i.e., for items such as property damage, liability/injuries and damages reserves, storm damage reserves, production maintenance contingencies, etc.), please:

- a. List each type of event/transaction/contingency for which reserves are established on the balance sheet.
- b. Provide the monthly expense accruals for the period January 2009 to date.
- c. Provide the payments or other charges by month made to each balance sheet reserve account for the period January 2009 to date.
- d. Provide the monthly balance of each reserve account for the period beginning January 2009 to date, reconciled into above-requested payment/charge off and expense accrual information.

RESPONSE:

- a. SPS reserves are established for regulatory and legal contingencies. Please refer to Exhibits SPS-AXM 10-21.1 and SPS-AXM 10.21.2 for the specific matters requiring reserves reflected on the balance sheets.
- b.d. Please refer to Exhibits SPS-AXM 10-21.1 and SPS-AXM 10-21.2. Exhibit SPS-AXM 10-21.1 reflects transactions for reserves related to FERC matters in Object Account 13.372260, FERC Account 242, as further explained in the exhibit. Exhibit SPS-AXM 10-21.2 reflects transactions for reserves related to general legal liability matters and FERC matters in Object Accounts 13.373900 and 13.373900.1001, as further explained in the exhibit.

Preparers: Jolene Stephens, Merry Davis

Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-22:

[Balance Sheet] Please provide the most detailed (i.e., FERC account and other subaccounts as may have been established at SPS/Xcel's discretion) SPS standalone balance sheet at June 30, 2012, June 30, 2013 as well as the latest reporting period available. Please provide in Excel spreadsheet file format.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-22.

Preparer: Merry Davis
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-23:

[Balance Sheet] Referring to the balance sheet account entitled "Miscellaneous Deferred Debits" for SPS electric operations, please provide a description with the related cost of items found therein at the beginning and end of the historic test year as well as for the latest reporting period currently available. Also, if any of the deferred costs have a stated amortization period, please list the period of amortization, the annual amortization amount, the date amortization commenced, and provide reference to authorizing PUCT or other regulatory bodies' orders, if available and applicable.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-23.

Preparer: Merry Davis
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-24:

[Balance Sheet] Referring to the balance sheet account entitled "Other Regulatory Assets" for SPS electric operations, please provide a description with related cost of items found therein at the beginning and end of the historic test year as well as for the latest reporting period available. Also, if any of the deferred costs have a stated amortization period, please list the period of amortization, the annual amortization amount, the date amortization commenced, and provide reference to authorizing PUCT or other regulatory bodies' orders, if available and applicable.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-24.

Preparer: Merry Davis
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-25:

[Balance Sheet] Referring to the balance sheet account entitled "Other Regulatory Liabilities" (Account 254) for SPS electric operations, please provide a description with related amounts for items found therein at the beginning and end of the historic test year as well as for the latest reporting period available. Also, if any of the deferred items have a stated amortization period, please list the period of amortization, the annual amortization amount, the date amortization commenced, and provide reference to authorizing PUCT or other regulatory bodies' orders, if available and applicable.

RESPONSE:

Please refer to Exhibit SPS-AXM 10-25.

Preparer: Merry Davis
Sponsor: Michael J. Rodriguez

QUESTION NO. AXM 10-26:

[Test Year] Ref: McNulty Kropp Direct Testimony. The referenced testimony at pages 14 - 15 generally describes the test year for the base rate case as the twelve-month period from July 1, 2012 through June 30, 2013, adjusted for known and measurable changes. Company witnesses also identify areas where the test year has been adjusted to reflect known and measureable changes expected to occur at various points in time in 2014.

- a. Please provide a descriptive listing of each element of rate base SPS proposes to be considered in determining the requested change in base rates where the Company has relied upon known and measurable changes that are expected to occur subsequent to 2013.
- b. Please provide a descriptive listing of each element of revenue credits SPS proposes to be considered in determining the change in base rates where the Company has relied upon known and measurable changes that are expected to occur subsequent to 2013.
- c. Please provide a descriptive listing of each element of operating and maintenance expense, depreciation expense, taxes other than income tax expense and income tax expense SPS proposes to be considered in determining the change in base rates where the Company has relied upon known and measurable changes that are expected to occur subsequent to 2013.
- d. Please provide a descriptive listing of each element of the proposed capital structure or capital cost rates SPS proposes to be considered in determining the change in base rates where the Company has relied upon known and measurable changes that are expected to occur subsequent to 2013.

RESPONSE:

The June 2015 reduction in load attributable to the ramp-down reflected in the Golden Spread Electric Cooperative, Inc. ("Golden Spread") wholesale contract affects the Production Demand (12CP-PROD) fundamental allocator. Changes in that allocator affect the other allocators that are derived within the cost of service, and therefore the reduction in load associated with the Golden Spread contract affects substantially all elements of the cost of service. In contrast, costs that are allocated using a distribution allocator will not be affected by the reduction in load attributable to the Golden Spread contract. Those elements of costs include distribution plant, accumulated depreciation and the related ADIT; distribution inventory; and distribution O&M.

- a. SPS did not make any changes to rate base for known and measurable changes expected to occur after 2013. SPS did make a change to rate base for the sale of certain transmission assets to Sharyland Distribution and Transmission Services, LLC, as discussed on pages 20-21 of the Direct Testimony of Kathy McNulty Kropp, (RR14, pages 139-140 of 553). Please refer to the details of adjustments to rate base accounts in Attachment KMK-RR-1 (Vol. RR14, pages 229 and 231 of 553). The summary of the adjustments for Sharyland assets appears on in Attachment KMK-RR-1 as well (Vol. RR14, page 244 of 553).
- b. Please refer to Exhibit SPS-AXM 10-26(b).
- c. Please refer to Exhibit SPS-AXM 10-26(c).
- d. SPS did not make any changes to the proposed capital structure or capital cost rates for known and measurable changes expected to occur after 2013.

Preparer: Kathy McNulty Kropp
Sponsor: Kathy McNulty Kropp

QUESTION NO. AXM 10-27:

[Purchased Power – Capacity Agreements] Please provide copies of all purchased power contracts underlying the Company's pro forma purchased power capacity cost adjustments that may not have been provided in response to AXM RFI 1-16 (which had sought "purchased power agreements... in effect during the reconciliation period").

RESPONSE:

Please refer to SPS's response to Question No. AXM 1-16.

Preparer: Jeff Butler
Sponsor: Jeffrey C. Klein

QUESTION NO. AXM 10-28:

[Purchased Power – Capacity Agreements] Ref: Attachment JCK-RR-2 to Mr. Jeffrey Klein's direct testimony. For each purchase power agreement for which the Company has proposed a pro forma capacity adjustment to increase capacity payments above test year levels, please reference rates found within contracts being provided within the response to AXM RFI 1-16 or AXM RFI 10-27 (immediately above) and show application of such rates to pro forma billing determinants to arrive at "Proforma Test Year" amounts found on Attachment JCK-RR-2, and as applicable, show application of the rates to test year billing determinants to arrive at values reflected within the column entitled "Base Test Year (\$)."

RESPONSE:

Please refer to Exhibit SPS-AXM 10-28.1(CONF) for the derivation of the Adjusted Test Year and the Pro Forma Adjustment figures in Attachment JCK-RR-2 for the power purchase agreements ("PPAs") for which SPS proposed either an increase or a decrease as compared to the amounts for the Reconciliation Period.

Please refer to Exhibit SPS-AXM 10-28.2(CONF), Reconciliation Period PPA invoices, for the invoices for Sid Richardson Carbon, Ltd., the only PPA with capacity-related costs for which SPS does not propose a pro forma capacity adjustment, to see the result of the application of the billing determinants for that PPA.

Preparers: Joanne Schmidt, Jeff Butler

Sponsor: Jeffrey C. Klein

QUESTION NO. AXM 10-29:

[Electric Commodity Trading Margins] Please state and describe every change in facts, conditions and/or events that has occurred since PUCT Docket No. 38147 that would support moving the sharing of Electric Commodity Trading Margins above \$400,000 from the current split of 55-45(ratepayer-shareholder) to a 50-50 (ratepayer-shareholder) split.

RESPONSE:

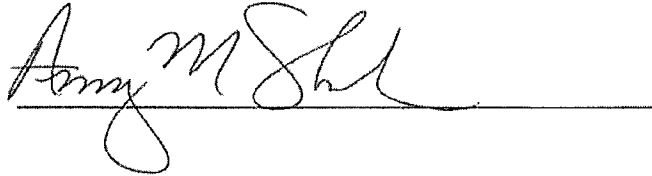
The facts supporting a 50-50 sharing of net margins derived from electric commodity trading are those set forth in the Direct Testimony of Michael E. Mally at page 22 (Vol. FR1, page 22 of 546), and these facts have not changed since Docket No. 38147 was resolved. The 55-45 (customer-shareholder) sharing approved in Docket Nos. 38147 and 40824 was the result of comprehensive settlements resolving all issues in those dockets. This docket has not been settled and, in the absence of settlement, a 50-50 sharing is an equitable sharing proposal.

In Docket No. 29801, the Commission approved a sharing percentage that allocated 60 percent to shareholders and 40 percent to customers.

Preparer: Jeff Butler
Sponsors: David T. Hudson, Michael E. Mally

CERTIFICATE OF SERVICE

I certify that on the 27th day of February 2014, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service and by either hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

A handwritten signature in cursive script, appearing to read "Amy M. Sh...", is written over a horizontal line.

SOUTHWESTERN PUBLIC SERVICE COMPANY

		(a)	(b)			
		FERC 040910	FERC 023600			
Line			Beginning Bal	Accrual	Payments	Ending Bal
No	2012					
1	January	\$ 124,292.73	\$ (3,184,000.00)	\$ (124,292.73)	\$ -	\$ (3,308,292.73)
2	February	84,604.83	(3,308,292.73)	(84,604.83)	77,704.62	(3,315,192.94)
3	March	236,383.32	(3,315,192.94)	(236,383.32)	(12,866.62)	(3,564,442.88)
4	April	161,473.55	(3,564,442.88)	(161,473.55)	-	(3,725,916.43)
5	May	381,693.25	(3,725,916.43)	(381,693.25)	3,985,000.00	(122,609.68)
6	June	562,271.29	(122,609.68)	(562,271.29)	(800,000.00)	(1,484,880.97)
7	July	696,275.30	(1,484,880.97)	(696,275.30)	-	(2,181,156.27)
8	August	636,457.74	(2,181,156.27)	(636,457.74)	217,000.00	(2,600,614.01)
9	September	477,475.47	(2,600,614.01)	(477,475.47)	(46,683.00)	(3,124,772.48)
10	October	132,799.87	(3,124,772.48)	(132,799.87)	-	(3,257,572.35)
11	November	(5,526.45)	(3,257,572.35)	5,526.45	(8,227.79)	(3,260,273.69)
12	December	\$ 86,826.31	\$ (3,260,273.69)	\$ (86,826.31)	\$ -	\$ (3,347,100.00)
13		<u>\$ 3,575,027.21</u>				
2013						
14	January	\$ 202,210.43	\$ (3,347,100.00)	\$ (202,210.43)	\$ -	\$ (3,549,310.43)
15	February	152,376.74	(3,549,310.43)	(152,376.74)	-	(3,701,687.17)
16	March	137,390.78	(3,701,687.17)	(137,390.78)	-	(3,839,077.95)
17	April	84,442.49	(3,839,077.95)	(84,442.49)	-	(3,923,520.44)
18	May	215,490.36	(3,923,520.44)	(215,490.36)	4,194,000.00	54,989.20
19	June	631,748.67	54,989.20	(631,748.67)	(847,000.00)	(1,423,759.47)
20	July	663,214.00	(1,423,759.47)	(663,214.00)	-	(2,086,973.47)
21	August	775,618.49	(2,086,973.47)	(775,618.49)	427,000.00	(2,435,591.96)
22	September	161,439.16	(2,435,591.96)	(161,439.16)	(17,136.00)	(2,614,167.12)
23	October	150,196.52	(2,614,167.12)	(150,196.52)	(338,882.01)	(3,103,245.65)
24	November	64,936.86	(3,103,245.65)	(64,936.86)	-	(3,168,182.51)
25	December	\$ (1,039,315.50)	\$ (3,168,182.51)	\$ 1,039,315.50	\$ -	\$ (2,128,867.01)
26		<u>\$ 2,199,749.00</u>				
2014						
27	January	\$ 211,317.73	\$ (2,128,867.01)	\$ (211,317.73)	\$ -	\$ (2,340,184.74)
28		<u>\$ 211,317.73</u>				

SOUTHWESTERN PUBLIC SERVICE COMPANY

Actuals		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13
Write Offs	Commodity & Non Commodity	311,830	403,465	421,111	338,424	340,326	266,962	249,494
Recoveries	Commodity & Non Commodity	(89,995)	(104,284)	(84,852)	(99,494)	(119,750)	(69,655)	(79,856)
Accrual/Reserve Change and Other	Commodity & Non Commodity	71,970	(110,396)	(116,498)	(55,781)	(58,846)	208,751	255,506
FERC 904 Expense *		293,805	188,785	219,761	184,149	161,729	406,058	425,144
Billed Commodity Revenues		85,661,043	74,080,183	76,306,704	80,281,268	78,651,342	92,829,106	122,132,511
Uncollectible Reserve Balance	Account 115601 & 115603	(2,833,424)	(2,723,618)	(2,607,707)	(2,552,262)	(2,494,068)	(2,557,193)	(2,812,898)
Write Offs		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14
Recoveries	Commodity & Non Commodity	300,602	-	-	-	-	-	-
Accrual/Reserve Change and Other	Commodity & Non Commodity	(83,452)	-	-	-	-	-	-
FERC 904 Expense *		161,592	-	-	-	-	-	-
Billed Commodity Revenues		378,742	-	-	-	-	-	-
Uncollectible Reserve Balance	Account 115601 & 115603	102,670,836	-	-	-	-	-	-
Budget		Jan-13	Feb-13	Mar-13	Apr-13	May-13	Jun-13	Jul-13
FERC 904 Expense *	Commodity & Non Commodity	209,327	232,148	254,792	235,541	269,733	317,797	364,409
Billed Commodity Revenues		67,602,319	75,362,459	83,062,482	76,516,243	88,143,372	104,487,397	120,337,881
FERC 904 Expense *		Jan-14	Feb-14	Mar-14	Apr-14	May-14	Jun-14	Jul-14
Billed Commodity Revenues	Commodity & Non Commodity	282,530	221,030	238,799	312,579	282,688	487,295	380,321
		97,230,041	87,716,788	91,723,611	89,723,529	96,952,758	112,829,365	128,725,247

* FERC 904 SPS bad debt expense relating to customer accounts supported by Customer Care

SOUTHWESTERN PUBLIC SERVICE COMPANY

Actuals									
	Aug-13	Sep-13	Oct-13	Nov-13	Dec-13	Year End			
Write Offs									
Recoveries	368,093	255,059	340,016	265,451	257,108	3,818,338			
Accrual/Reserve Change and Other	(81,320)	(93,849)	(97,196)	(83,907)	(70,869)	(1,075,027)			
FERC 904 Expense *	60,947	96,625	94,773	(62,393)	153,277	537,936			
Billed Commodity Revenues	347,720	257,835	337,594	119,151	339,516	3,281,247			
	120,216,030	114,476,297	100,828,319	81,813,318	93,152,425	1,120,428,545			
Uncollectible Reserve Balance	(2,874,242)	(2,972,017)	(3,067,064)	(3,005,128)	(3,158,466)				
Budget									
Write Offs									
Recoveries									
Accrual/Reserve Change and Other									
FERC 904 Expense *									
Billed Commodity Revenues									
Uncollectible Reserve Balance									
Budget									
FERC 904 Expense *									
Billed Commodity Revenues									
FERC 904 Expense *									
Billed Commodity Revenues									

* FERC 904 SPS bad debt expense relating to customer accounts sur

SOUTHWESTERN PUBLIC SERVICE COMPANY

UNCOLLECTIBLE PERCENT ESTIMATES FOR THE PERIOD OF JANUARY 2011 TO JANUARY 2014

Skip Trace Flag	Customer Type	Customer Status	Debt Aged Bucket	Jan 2011-April 2011	
				Current	0.98%
Residential	Active		Current	1-30	3.11%
			31-60	9.04%	
			61-90	15.45%	
			91-120	19.91%	
			121-150	22.31%	
			151-180	24.00%	
			181-210	24.95%	
			211-240	25.91%	
			241-270	26.51%	
			271-300	27.90%	
	301+	29.15%			
	Final	Current	1-30	48.07%	
		31-60	62.42%		
		61-90	69.23%		
		91-120	73.87%		
		121-150	77.95%		
		151-180	80.23%		
		181+	81.72%		
		181+	100.00%		
Commercial	Active		Current	1-30	0.11%
			31-60	0.35%	
			61-90	4.44%	
			91-120	9.09%	
			121-150	11.17%	
			151-180	13.17%	
			181-210	15.23%	
			211-240	18.02%	
			241-270	22.04%	
			271-300	25.01%	
	301+	27.00%			
	Final	Current	1-30	32.00%	
		31-60	37.91%		
		61-90	58.90%		
		91-120	74.87%		
		121-150	83.37%		
		151-180	85.91%		
		181+	90.04%		
		181+	100.00%		
Industrial	Active		Current	1-30	0.02%
			31-60	0.11%	
			61-90	0.66%	
			91-120	3.21%	
			121-150	4.19%	
			151-180	6.41%	
			181-210	9.30%	
			211-240	11.80%	
			241-270	13.70%	
			271-300	14.70%	
	301+	15.90%			
		301+	20.10%		

SOUTHWESTERN PUBLIC SERVICE COMPANY

UNCOLLECTIBLE PERCENT ESTIMATES FOR THE PERIOD OF JANUARY 2011 TO JANUARY 2014

Skip Trace Flag	Customer Type	Customer Status	May 2011-April 2012	May 2012-April 2013	May 2013-Jan 2014
	Residential	Active	0.99%	0.99%	0.99%
			3.32%	3.30%	2.97%
			9.00%	9.00%	7.77%
			18.58%	17.00%	15.94%
			25.00%	24.00%	21.80%
			29.58%	27.00%	25.48%
			30.48%	30.00%	27.18%
			31.70%	31.00%	28.65%
			31.84%	32.00%	29.67%
			32.00%	33.10%	30.55%
	Commercial	Active	32.50%	34.20%	30.72%
			33.10%	35.00%	31.00%
			52.54%	55.00%	53.65%
			66.34%	66.04%	66.13%
			72.99%	73.48%	73.05%
			76.01%	76.69%	77.09%
			79.43%	80.04%	80.78%
			81.94%	82.22%	83.23%
			83.27%	83.12%	84.34%
			100.00%	100.00%	100.00%
	Industrial	Active	0.15%	0.13%	0.11%
			0.34%	0.80%	0.51%
			4.41%	5.00%	7.98%
			9.08%	7.00%	18.45%
			11.17%	12.00%	25.29%
			13.17%	18.00%	29.48%
			15.23%	21.30%	34.70%
			18.02%	27.40%	38.00%
			22.04%	27.50%	38.75%
			25.01%	28.00%	41.59%
	Commercial	Final	27.00%	29.00%	41.87%
			30.00%	30.00%	41.88%
			30.25%	35.00%	41.90%
			50.10%	63.80%	55.00%
			70.24%	80.00%	68.00%
			79.14%	85.36%	86.36%
			80.64%	91.38%	92.41%
			82.00%	92.08%	95.33%
			94.00%	92.64%	96.26%
			100.00%	100.00%	100.00%
	Industrial	Active	0.06%	0.07%	0.05%
			0.31%	0.51%	0.35%
			3.08%	2.00%	2.70%
			9.00%	7.70%	5.50%
			13.00%	10.50%	12.00%
			14.00%	16.10%	15.00%
			15.00%	32.00%	20.00%
			16.00%	35.00%	24.00%
			17.00%	36.00%	26.00%
			18.00%	37.00%	27.50%
	Industrial	Final	19.00%	38.00%	28.00%
			20.75%	39.50%	28.50%

SOUTHWESTERN PUBLIC SERVICE COMPANY

UNCOLLECTIBLE PERCENT ESTIMATES FOR THE PERIOD OF JANUARY 2011 TO JANUARY 2014

Skip Trace Flag	Customer Type	Customer Status	Debt Aged Bucket	Jan 2011-April 2011	
				Current	%
Other	Active	Final	Current	21.90%	
			1-30	23.38%	
			31-60	29.40%	
			61-90	37.46%	
			91-120	48.51%	
			121-150	59.80%	
			151-180	69.00%	
			181+	100.00%	
			Current	0.00%	
			1-30	0.00%	
	Final	Final	31-60	0.00%	
			61-90	0.00%	
			91-120	0.00%	
			121-150	0.00%	
			151-180	0.00%	
			181-210	0.00%	
			211-240	0.00%	
			241-270	0.00%	
			271-300	0.00%	
			301+	0.00%	
Residential	Active	Final	Current	28.02%	
			1-30	28.04%	
			31-60	29.55%	
			61-90	31.50%	
			91-120	32.13%	
			121-150	33.00%	
			151-180	38.46%	
			181-210 or 181+	41.28%	
			211-240	43.26%	
			241-270	43.95%	
	Final	Final	44-44%	44.60%	
			271-300	62.45%	
			301+	68.60%	
			Current	74.02%	
			1-30	80.96%	
			31-60	83.60%	
			61-90	85.00%	
			91-120	88.83%	
			121-150	100.00%	
			151-180		
181-210 or 181+					

SOUTHWESTERN PUBLIC SERVICE COMPANY

UNCOLLECTIBLE PERCENT ESTIMATES FOR THE PERIOD OF JANUARY 2011 TO JANUARY 2014

Skip Trace Flag	Customer Type	Customer Status	May 2011-April 2012		May 2012-April 2013		May 2013-Jan 2014	
			21.00%	50.00%	40.00%	41.00%	35.00%	23.00%
Other	Active	Final	50.00%	70.00%	43.00%	50.00%	50.00%	56.00%
			80.00%	80.00%	50.00%	50.00%	56.00%	70.00%
			85.30%	85.30%	63.50%	75.00%	80.00%	80.00%
			90.02%	90.02%	75.00%	85.00%	82.00%	82.00%
			96.04%	96.04%	85.00%	100.00%	100.00%	100.00%
			100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Residential	Active	Final	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Residential	Active	Final	33.88%	34.39%	32.87%	34.54%	34.50%	34.50%
			36.79%	36.79%	38.42%	38.42%	36.64%	36.64%
			38.32%	38.32%	40.52%	41.35%	41.35%	41.35%
			40.98%	40.98%	42.19%	43.32%	43.32%	43.32%
			43.47%	43.47%	43.00%	44.30%	44.30%	44.30%
			44.55%	44.55%	44.00%	47.25%	47.25%	47.25%
			46.80%	46.80%	45.26%	48.50%	48.50%	48.50%
			47.00%	47.00%	47.27%	48.66%	48.66%	48.66%
			48.50%	48.50%	48.74%	50.00%	50.00%	50.00%
			48.80%	48.80%	49.76%	51.89%	51.89%	51.89%
Residential	Active	Final	51.53%	51.53%	54.50%	54.87%	52.50%	52.50%
			71.25%	71.25%	85.32%	89.25%	89.25%	89.25%
			79.79%	79.79%	90.36%	96.77%	96.77%	96.77%
			85.16%	85.16%	95.49%	100.00%	100.00%	100.00%
			89.13%	89.13%	98.83%	100.00%	100.00%	100.00%
			93.05%	93.05%	100.00%	100.00%	100.00%	100.00%
			96.03%	96.03%	100.00%	100.00%	100.00%	100.00%
			98.36%	98.36%	100.00%	100.00%	100.00%	100.00%
			100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
			100.00%	100.00%	100.00%	100.00%	100.00%	100.00%