



Control Number: 42004



Item Number: 233

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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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**BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS**

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**ALLIANCE OF XCEL MUNICIPALITIES'
TWENTY-SIXTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Alliance of Xcel Municipalities ("AXM") Twenty-Sixth 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 31, 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

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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
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By Felipe Alonso III *by permission*
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**ATTORNEYS FOR ALLIANCE OF XCEL
MUNICIPALITIES**

CERTIFICATE OF SERVICE

I certify that I have served a copy of AXM's Twenty-Sixth Set of Requests for Information to SPS upon all known parties of record by fax and/or first class mail on this the 11th day of March 2014.

Felipe Alonso III *by permission*
Felipe Alonso III *M. Wood*

EXHIBIT A

SOAH DOCKET NO. 473-14-1665

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APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
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- 26-1. Reference page 18 of SPS Witness Welch's direct testimony, explain the purpose of the change noted to the Xcel JOA noted in footnote 3 and indicate how this change impacted the volume and price paid for SPS energy purchases from affiliates when compared to the previous method specified under the JOA.
- 26-2. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that resulted in reconciliation period costs, identify the Commission Docket Number and findings which approved the resource and provide the average cost of energy from the resource (\$/MWh) for the reconciliation period.
- 26-3. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that resulted in reconciliation period costs, provide the study supporting the reasonableness of the selected resource.
- 26-4. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that resulted in reconciliation period costs, provide the total estimated capacity and non-fuel costs which SPS expects to incur over the life of the resource.
- 26-5. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that did not result in reconciliation period costs, provide the study supporting the reasonableness of the selected resource, provide estimated transmission costs necessary to deliver the resource to SPS on a firm basis, and indicate when SPP transmission studies for the resource are expected to be completed.

- 26-6. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that did not result in reconciliation period costs, provide the estimated annual energy purchases (MWh), capacity costs, reconcilable energy costs and transmission costs necessary to deliver the resource to SPS on a firm basis for each of the first two years of the contract.
- 26-7. Reference page 11 of SPS Witness Weeks' direct testimony, for each of the listed new resources that did not result in reconciliation period costs, provide the total estimated capacity and non-fuel costs which SPS expects to incur over the life of the contract.
- 26-8. Provide the percentage and level of total capacity purchased under PPAs with wind generators that is included in establishing the Company's total Net Dependable Capacity as listed on SPS Witness Weeks' Attachment BFW-FR-3.
- 26-9. Provide workpapers and electronic files that include the underlying supply resources and capacity levels reflected in the Net Dependable Capacity totals for each year as reflected in SPS Witness Weeks' Attachments BFW-FR-1, BFW-FR-2, and BFW-FR-3.
- 26-10. Provide the monthly net generation, average capacity factor, and average energy production cost (\$/MWh) for Jones 4 for each month since the unit entered commercial operations.
- 26-11. Provide the estimated displacement of coal-fired generation by SPS wind energy purchases for each year of the last three calendar years and as forecasted for 2014, 2015 and 2016.
- 26-12. Reference page 33 of SPS Witness Weeks' direct testimony, provide summary results for the referenced Strategist analysis of wind PPAs that supports the estimated NPV savings of \$590.4 million, along with underlying assumptions regarding wind energy production (MWh) levels, wind energy costs, natural gas prices, carbon prices, and transmission costs for each year of the study period addressed by this analysis.
- 26-13. Reference page 34 of SPS Witness Weeks' direct testimony, provide the estimated cost of the referenced firm transmission service from OG&E.
- 26-14. Reference page 9 of SPS Witness Romer's direct testimony, provide the total reconciliation period costs billed from TUCO for the Harrington plant broken down by each of the cost components (and margin) cited in this testimony, along with the total tons of coal delivered to Harrington during this period, and identify the total amount in each category that was included as reconcilable fuel expense and the total amount that would normally be recoverable in SPS's base rates.

- 26-15. Reference page 9 of SPS Witness Romer's direct testimony, provide the total reconciliation period costs billed from TUCO for the Tolk plant broken down by each of the cost categories (and margin) cited in this testimony, along with the total tons of coal delivered to Tolk during this period, and identify the total amount in each category that was included as reconcilable fuel expense and the total amount that would normally be recoverable in SPS's base rates.
- 26-16. Reference pages 12-13 of SPS Witness Romer's direct testimony, provide the volume (tons) and average price of coal purchased (\$/ton) under each of the listed contracts during the reconciliation period.
- 26-17. Reference page 13 of SPS Witness Romer's direct testimony, provide the cost of coal transportation service (\$/ton) for the Harrington plant and for the Tolk plant during each month of the reconciliation period.
- 26-18. Reference page 14 of SPS Witness Romer's direct testimony, provide any analysis conducted by or for SPS or TUCO to assess the feasibility of adding a rail spur or other alternatives to allow other parties to compete with BNSF for providing coal transportation service to the Tolk plant.
- 26-19. Provide coal and coal transportation cost surveys conducted by SPS or TUCO to evaluate the reasonableness of coal costs for the Harrington and Tolk plants during the reconciliation period.
- 26-20. Provide the cost of coal for Harrington and Tolk that is used in costing off-system sales or in setting bid prices for energy sold from these plants into the SPP EIS market and indicate whether such costs fully reflect the costs of coal recovered through SPS's fuel factor and base rates. If not, explain why not.