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Addendum StartPage: 0

SOAH DOCKET NO. 473-15-1556

P.U.C. DOCKET NO. 43695

2015 JAN 27 AM 11:22

APPLICATION OF SOUTHWESTERN §
PUBLIC SERVICE COMPANY FOR §
AUTHORITY TO CHANGE RATES §

STATE OFFICE OF
FILING CLERK
ADMINISTRATIVE HEARINGS

**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
STAFF RFI NO. 6-1 THROUGH 6-18**

Pursuant to § 22.144 of the Commission's procedural rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Public Service Company by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

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178

Date: January 27, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 27, 2015, in accordance with P.U.C. PROC. R. 22.74.



Sam Chang

**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
STAFF RFI NO. 6-1 THROUGH 6-18**

INSTRUCTIONS

1. Pursuant to P.U.C. Proc. R. 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
2. Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
3. These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
4. Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
5. The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. Pursuant to P.U.C. Proc. R. 22.144(g)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
8. Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
STAFF RFI NO. 6-1 THROUGH 6-18**

DEFINITIONS

1. "SPS" or "you" refers to Southwestern Public Service Company and any entity or person acting on its behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, independent contractors, expert witnesses, or other persons.
2. "Commission" means the Public Utility Commission of Texas.
3. "Document" is used in its broadest sense to include, by way of illustration and not limitation, all written or graphic matter of every kind and description, whether printed, produced, or reproduced by any process (visually, magnetically, mechanically, electronically, or by hand); whether a final draft, initial draft, original copy, or reproduction; whether claimed as privileged or otherwise excludable from discovery; and whether or not in your actual or constructive possession, custody, or control. The term includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to Electronically Stored Information, correspondence, e-mails, telegrams, contracts, agreements, notes in any form, memoranda, reports, invoices, ledgers, spreadsheets, data, models, diaries, compilations, voice recording tapes, microfilms, pictures, computer media, workpapers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
4. "Electronically Stored Information" means data that is created, altered, communicated, and stored in digital form.
5. "FERC" means the Federal Energy Regulatory Commission.
6. "Including" means and refers to "including but not limited to."
7. "Regarding" includes the following meanings: relating to, pertaining to, concerning, discussing, mentioning, containing, reflecting, evidencing, describing, showing, identifying, providing, disproving, consisting of, supporting, or contracting in any way legally, logically, or factually connected with the matter to which the term refers or having a tendency to prove or disprove the matter to which the term refers.

**COMMISSION STAFF'S SIXTH REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY
STAFF RFI NO. 6-1 THROUGH 6-18**

- STAFF RFI NO. 6-1** Are there any differences in power quality or reliability standards for retail customers who are connected at transmission voltage as compared to retail customers who are connected at distribution voltage? If so, are these differences reflected in the SPS tariff? Please explain in detail.
- STAFF RFI NO. 6-2** Are there any differences in power quality or reliability standards for retail customers who lease transformation equipment or other equipment from SPS to facilitate connection to SPS as compared to retail customers who do not lease such equipment? If so, are these differences reflected in the SPS tariff? Please explain in detail.
- STAFF RFI NO. 6-3** Do any retail customers connected at distribution voltage lease transformation equipment or other equipment from SPS to facilitate connection to SPS? If so, please describe the leased equipment and explain why such arrangement is necessary.
- STAFF RFI NO. 6-4** Does SPS have a standard contract or agreement for leasing transformation equipment or other equipment to a retail customer? Is such contract or agreement reflected in the SPS tariff? If so, is this the only contract or agreement that is currently in effect for this purpose? Please provide a copy (or copies) of such contracts or agreements.
- STAFF RFI NO. 6-5** Do retail customers who are connected to SPS at transmission voltage have any additional rights or privileges resulting from such connection arrangement that are not shared by retail customers who are connected at distribution voltage? Please explain in detail.
- STAFF RFI NO. 6-6** Is a standard fixed term specified in all contracts or agreements regarding retail customers leasing transformation equipment or other equipment? If so, is the lease term negotiable?
- STAFF RFI NO. 6-7** Does SPS have any contracts or agreements for leasing transformation equipment that do not have a fixed term? If so, please provide a list of parties to such contracts or agreements.
- STAFF RFI NO. 6-8** State whether any rate-case expenses, unamortized or otherwise, from Commission Docket Nos. 40824, 42004, or 43695 are proposed to be included in SPS's rate base for the purpose of calculating SPS's total cost of capital.
- STAFF RFI** When answering Staff RFI No. 6-8, identify and quantify any rate-case expenses

- NO. 6-9** added to or removed from SPS's rate base and provide references to relevant schedules and workpapers, including Schedule B.
- STAFF RFI NO. 6-10** In addition to your answers to Staff RFI Nos. 6-8 and 6-9, identify and quantify, including referencing relevant schedules and workpapers, each individual regulatory deferred account requested to be included in rate base.
- STAFF RFI NO. 6-11** For each regulatory deferred account identified in response to Staff RFI No. 6-10, identify by Commission Docket Number any Commission order granting the authority to establish the deferred account and any Commission order granting the authority to include the deferred account in rate base.
- STAFF RFI NO. 6-12** With regards to mutual aid during the test year:
- a. State the dollar amount of mutual aid that was received or provided by SPS.
 - b. State the FERC account(s) that were charged as a result of mutual aid received or provided by SPS.
 - c. State the FERC account(s) to which reimbursement of expenses incurred by SPS in providing mutual aid was (were) allocated.
- STAFF RFI NO. 6-13** State the Commission docket numbers associated with SPS's transmission lines that were placed in service during the test year.
- STAFF RFI NO. 6-14** For SPS's transmission lines that were placed in service during the test year, state (1) the initial estimated cost for such lines and (2) the actual cost of service for such lines.
- STAFF RFI NO. 6-15** With regards to land purchased by SPS prior to the test year but for transmission substations that were placed in service during the test year:
- a. State the size, in acreage, of the land that was purchased.
 - b. State the purchase price of the land.
 - c. State the FERC account(s) that was (were) charged for the purchase of such land.
 - d. What percentage of the purchase price is allocated to transmission?
 - e. What percentage of the purchase price is allocated to distribution?
 - f. What percentage of the land is not being physically used for either transmission or distribution operations?
- STAFF RFI NO. 6-16** With regards to land purchased by SPS during the test year for transmission substations that were placed in service during the test year:
- a. State the size, in acreage, of the land that was purchased.
 - b. State the purchase price of the land.
 - c. State the FERC account(s) that was (were) charged for the purchase of

- such land.
- d. What percentage of the purchase price is allocated to transmission?
 - e. What percentage of the purchase price is allocated to distribution?
 - f. What percentage of the land is not being physically used for either transmission or distribution operations?

**STAFF RFI
NO. 6-17** With regards to land purchased by SPS during the test year for transmission substations that have yet to be placed in service:

- a. State the size, in acreage, of the land that was purchased.
- b. State the purchase price of the land.
- c. State the FERC account(s) that was (were) charged for the purchase of such land.
- d. What percentage of the purchase price is allocated to transmission?
- e. What percentage of the purchase price is allocated to distribution?
- f. What percentage of the land is not being physically used for either transmission or distribution operations?

**STAFF RFI
NO. 6-18** Provide SPS's depreciation model in Microsoft Excel format. All formulas shall be intact and unaltered.