



Control Number: 44698



Item Number: 23

Addendum StartPage: 0

SOAH DOCKET NO. 473-15-3686
PUC DOCKET NO. 44698

2015 JUN 11 PM 2:05

APPLICATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
PUBLIC SERVICE COMPANY TO §
ADJUST ITS ENERGY EFFICIENCY § FILING CLERK
COST RECOVERY FACTOR § OF TEXAS

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

Pursuant to 16 TAC § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Public Service Company (SPS) 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. 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.

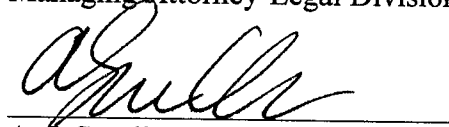
23

Dated: June 11, 2015

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division


Karen S. Hubbard
Managing Attorney-Legal Division



A. J. Smullen
Attorney-Legal Division
State Bar No. 24083881
(512) 936-7289
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on June 11, 2015, in accordance with 16 Tex. Admin. Code § 22.74.


A. J. Smullen

**SOAH DOCKET NO. 473-15-3686
PUC DOCKET NO. 44698**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

DEFINITIONS

- 1) "SPS", "the Company" or "you" refers to the Southwestern Public Service Company and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, 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. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do not exist and these documents will be provided.

**SOAH DOCKET NO. 473-15-3686
PUC DOCKET NO. 44698**

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5**

INSTRUCTIONS

- 1) Pursuant to 16 TAC § 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 16 TAC § 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.

SOAH DOCKET NO. 473-15-3686
PUC DOCKET NO. 44698

COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-5

- Staff 2-1 For each of the Company's base-rate rate schedules that contains customers that (a) received energy efficiency services in 2014, (b) was assessed the EECRF in 2014, or (c) is assigned budgeted costs in the Company's 2016 energy efficiency plan, please provide the following *actual historical* information from program year 2014:
- (a) Incentive payments received;
 - (b) EECRF billing units;
 - (c) Administrative expenses directly assigned to that rate schedule;
 - (d) Administrative expenses allocated to that rate schedule;
 - (e) Research and development expenses directly assigned to that rate schedule;
 - (f) Research and development expenses allocated to that rate schedule;
 - (g) Evaluation, Measurement and Verification expenses directly assigned to that rate schedule;
 - (h) Evaluation, Measurement and Verification expenses allocated to that rate schedule;
- Staff 2-2 For each of the Company's base-rate rate schedules that contains customers that (a) received energy efficiency services in 2014, (b) was assessed the EECRF in 2014, or (c) is assigned budgeted costs in the Company's 2016 energy efficiency plan, please provide the following *budgeted and/or forecasted* information for program year 2016:
- (a) Incentive payments;
 - (b) EECRF billing units;
 - (c) Administrative expenses directly assigned;
 - (d) Administrative expenses allocated;
 - (e) Research and development expenses directly assigned;
 - (f) Research and development expenses allocated;
 - (g) Evaluation, Measurement and Verification expenses directly assigned;
 - (h) Evaluation, Measurement and Verification expenses allocated.
- Staff 2-3 For any amounts that were allocated in SPS's response to Staff 2-1 and 2-2, please (a) explain the allocation basis, if any, (b) explain the basis for any departures from the allocation basis specified in the Commission's EE rule, if any (c) provide the work papers that support the derivation of the allocation factor, if any, and (d) provide a brief narrative justification for the Company's assignment or allocation basis.

- Staff 2-4 Please explain the Company's proposed treatment of the EM&V amounts in its proposed true-up methodology for program year 2014, including (a) the program years that the associated EE measures were implemented, (b) the year that the EM&V activities took place, (c) the EECRF rate year that the budgeted amounts were reflected in the EECRF revenue requirement, (d) the EECRF docket in which the amounts were approved, (e) the variance between the EM&V contractor's projected expenses and its actual expenses, if any.
- Staff 2-5 If the measures that were the subject of the EM&V activities that the Company reflected in its 2014 true-up were implemented in multiple program years, please provide the actual historical incentive payments received by each rate schedule in each program year.