



Control Number: 45916



Item Number: 17

Addendum StartPage: 0

SOAH DOCKET NO. 473-16-4019  
PUC DOCKET NO. 45916

RECEIVED

APPLICATION OF SOUTHWESTERN  
PUBLIC SERVICE COMPANY TO  
ADJUST ITS ENERGY EFFICIENCY  
COST RECOVERY FACTOR

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BEFORE THE STATE OFFICE  
2016 MAY 18 AM 10:13  
PUBLIC UTILITY COMMISSION  
OFFILING CLERK

ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-3

Pursuant to 16 Tex. Admin. Code Ann. § 22.144 (TAC), the Staff of the Public Utility Commission of Texas (Staff) requests that the 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 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.

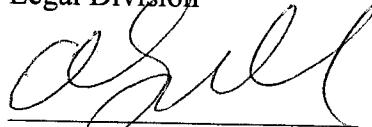
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 18, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton  
Division Director-Legal Division

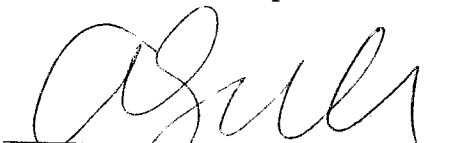
Stephen Mack-Managing Attorney  
Legal Division



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 May 18, 2016, in accordance with 16 TAC § 22.74.

  
A. J. Smullen

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**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)  
QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-3**

**DEFINITIONS**

- A. "SPS" 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.
- B. "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.

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-3**

**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.

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QUESTION NOS. STAFF 2-1 THROUGH STAFF 2-3**

- Staff 2-1                      For each rate class, please provide actual historical incentive payments received by customers in that rate class during program year 2015. For the purpose of this request, please exclude amounts that cannot be directly assigned to a rate class.
- Staff 2-2                      For each rate class, please provide actual historical program year 2015 costs assigned and allocated to that rate class. Please (a) break out the costs into incentives, administrative, R&D, EM&V, rate case expenses, performance bonus, and all other relevant cost categories (b) identify directly assigned versus allocated amounts for each category of costs, (c) identify the allocation basis for allocated amounts, (d) provide the workpapers that support the development of all allocation factors, (e) provide a narrative justification for each requested allocation basis.
- Staff 2-3                      For each rate class, provide actual historical EECRF collections from that class during program year 2015.