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SOAH DOCKET NO. 473-16-4019
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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY TO § OF
ADJUST ITS ENERGY EFFICIENCY § ADMINISTRATIVE HEARINGS
COST RECOVERY FACTOR

**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
FIRST SUPPLEMENTAL
RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-3**

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SOAH Docket No. 473-16-4019

PUC Docket No. 45916

*Southwestern Public Service Company's First Supplemental Response to
Commission Staff's First Request for Information*

1

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FIRST SUPPLEMENTAL
RESPONSE TO COMMISSION STAFF'S
FIRST REQUEST FOR INFORMATION
QUESTION NO. 1-3**

Southwestern Public Service Company ("SPS") files this supplemental response to Commission Staff's ("Staff") First Set of Requests for Information, Question No. 1-3.

I. WRITTEN RESPONSES

SPS's written supplemental response to Staff's First Set of Requests for Information, Question No. 1-3, is 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. Pursuant to 16 Tex. Admin Code § 22.144(c)(2)(A) (TAC), 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 pursuant to 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), SPS stipulates that its responses may be treated by all parties as if they were made under oath.

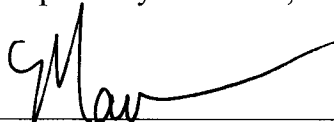
II. INSPECTIONS.

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 16 TAC § 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.

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 16 TAC § 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 rhmos@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,



WINSTEAD PC

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SOAH Docket No. 473-16-4019

PUC Docket No. 45916

*Southwestern Public Service Company's First Supplemental Response to
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SUPPLEMENTAL RESPONSE

QUESTION NO. Staff 1-3:

Please refer to Attachment MVP-4. Please provide a summary reconciling the receipts provided in Attachment MVP-4 to the amount of \$9,183.65 for non-labor affiliate expenses stated at Table MVP-6. Please provide an explanation for any difference between the \$9,183.65 amount and the total of receipts provided.

MAY 4, 2016 SUPPLEMENTAL RESPONSE:

Since SPS filed its initial response on May 25, 2016, it has come to the attention of SPS that the first sentence of this response was unclear. Accordingly, SPS supplements its response to replace the first paragraph of the initial response with new language. The complete revised answer is:

In Program Year 2015 SPS incurred \$9,183.65 of non-labor related affiliate expenses. Of that amount, \$2,057.99 were incurred as rate case expenses. These expenses are recorded in Attachment MVP-5 with receipts provided. These expenses were incurred by SPS witnesses Michael V. Pascucci and J. Derek Shockley for travel related to the EECRF proceeding. These expenses are only included in SPS's rate case expenses and are not included in the program specific administration or general administration costs requested in SPS's EECRF filing. The remaining \$7,125.66 are costs associated with the administration of SPS's energy efficiency and load management programs. These program related costs are for activities such as traveling to attend utility meetings, traveling for project inspections, and employee expenses associated with the management of the programs. The expenses included in \$7,125.66 of program related affiliate expenses are included in the amounts for program specific administration and general administration costs. These expenses are included in Attachment MVP-4 with appropriate receipts and invoices.

In reconciling the expenses with the receipts SPS identified the following:

1. \$447.20 for airfare for June 2015 EUMMOT Meeting for Bryan Whitson.
Please refer to Exhibit SPS-Staff 1-3;
2. \$11.36 service fee for February 2015 EUMMOT Meeting (no receipt);
3. \$22 service fee for June 2015 EUMMOT Meeting (no receipt);
4. \$9.29 service fee for January travel (no receipt);

5. Mileage receipts incorrectly calculating the reimbursement rate at \$0.56/mile instead of the approved \$0.575/mile; and
6. September 2015 (Attachment MVP-4, page 37 of 55) mileage included 108 miles, which were not included in any expense report, resulting in a reduction of \$62.10.

Preparer: Michael V. Pascucci
Sponsor: Michael V. Pascucci

CERTIFICATE OF SERVICE

I certify that on the 31st day of May, 2016, a true and correct copy of the foregoing document was served on all parties of record by electronic service and by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.