



Control Number: 45916



Item Number: 9

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
OF PUBLIC UTILITY COMMISSION
ADMINISTRATIVE HEARINGS

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION
TO SOUTHWESTERN PUBLIC SERVICE COMPANY (SPS)
QUESTION NOS. STAFF 1-1 THROUGH STAFF 1-8

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.

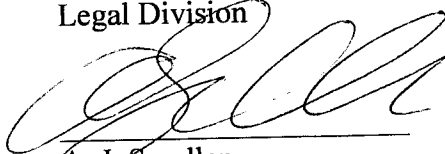
Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78711-3326.

Dated: May 5, 2016

Respectfully Submitted,

Margaret Uhlig Pemberton
Division Director-Legal Division

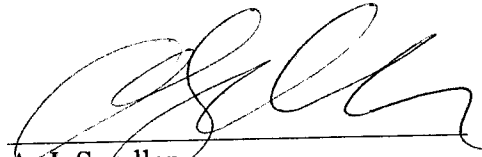
Stephen Mack-Managing Attorney
Legal Division



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 5, 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 1-1 THROUGH STAFF 1-8**

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, and all computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any 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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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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- Staff 1-1 Please identify all incentive compensation costs included in the EECRF by plan type for the reconciled years, current energy efficiency program year, and the 2017 energy efficiency program year.
- Staff 1-2 For each type of incentive compensation identified in the response to the above question, please separate the payments by operational performance and financial performance. Provide the information for expenses directly incurred by SPS and for expenses allocated to SPS by an affiliate.
- 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.
- Staff 1-4 Please refer to Attachment MVP-4. For all receipts related to mileage authorization forms, please indicate the year to which they apply.
- Staff 1-5 Please refer to MVP-4. Have there been any changes to the Company's policy regarding employee reimbursement of personal electronic device expenses since the last EECRF filing?
- Staff 1-6 Please refer to the direct testimony of Michael V. Pascucci, page 40, Table MVP-6. Please provide work orders/project summaries which support the affiliate labor and loading expenses.
- Staff 1-7 Does the Company's requested EECRF affiliate expenses include amounts for carrying charges on shared assets? If so, please provide the amounts by depreciation expenses, equity, and interest.
- Staff 1-8 Please refer to MVP-4, page 52. Please provide the EECRF purpose of the \$56.00 meeting registration.