



Control Number: 49495



Item Number: 26

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-4422  
PUC DOCKET NO. 49495**

2019 JUN 19 AM 11:07

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
PUBLIC SERVICE COMPANY TO §  
ADJUST ITS ENERGY EFFICIENCY § OF  
COST RECOVERY FACTOR § ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S SECOND REQUEST FOR  
INFORMATION TO SOUTHWESTERN PUBLIC SERVICE COMPANY  
STAFF RFI NOS. 2-1 THROUGH 2-2**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, 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 questions under oath. The questions 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 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. 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.

74

**Dated:** June 13, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

Margaret Uhlig Pemberton  
Division Director

Karen S. Hubbard  
Managing Attorney



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**SOAH DOCKET NO. 473-19-4422  
PUC DOCKET NO. 49495**

**CERTIFICATE OF SERVICE**

I certify that a copy of this document will be served on all parties of record on June 13, 2019, in accordance with 16 TAC § 22.74.



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Richard Nemer

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PUC DOCKET NO. 49495**

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**DEFINITIONS**

- A. "SPS," or "Company," refers to Southwestern Public Service Company and any person acting or purporting to act on its 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 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(h)(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 2-1** Please refer to SPS's current application to adjust its Energy Efficiency Cost Recovery Factor (Application), specifically Jeremy M. Lovelady's Direct Testimony, Table JML-3, page 32, at line 12. Regarding the aforementioned table within Mr. Lovelady's testimony, please provide the following information:

- a. A detailed itemization of the administration costs for the 2018 program year;
- b. A detailed itemization of the research and development costs for the 2018 program year;
- c. Copies of invoices for the costs itemized in Staff 2-1(a) and Staff 2-1(b); and
- d. Copies of contracts for the costs itemized in Staff 2-1(a) and Staff 2-1(b).

**Staff 2-2** Please refer to the Application, specifically J. Derek Shockley's Direct Testimony, Table JDS-1, page 19, line 1. Regarding the aforementioned table within Mr. Shockley's testimony, please provide the following information:

- a. A detailed itemization of the research and development costs proposed for the 2020 program year; and
- b. Copies of any contracts for the proposed costs itemized in Staff 2-2(a).