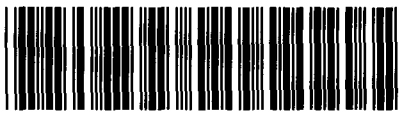

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APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO ADJUST ITS ENERGY EFFICIENCY COST RECOVERY FACTOR	§ § § §	**PUBLIC UTILITY COMMISSION OF TEXAS**

DIRECT TESTIMONY
of
JASON N. SMITH

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(*Filename:* SmithEECRFDirect.doc)

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

Acronym/Defined Term	Meaning
Commission	Public Utility Commission of Texas
CP	Coincident Peak
CPI	Consumer Price Index
EECRF	Energy Efficiency Cost Recovery Factor
EM&V	Evaluation, Measurement & Verification
kV	Kilovolt
kW	Kilowatt
kWh	Kilowatt-hour
MTP	Market Transformation Program
PY	Program Year
R&D	Research and Development
Rule 25.181	16 Texas Administrative Code § 25.181
Rule 25.182	16 Texas Administrative Code § 25.182
SPS	Southwestern Public Service Company, a New Mexico corporation
TRM	Technical Reference Manual

LIST OF ATTACHMENTS

Attachment	**Description**
JNS-1	Calculation of Energy Efficiency Cost Recovery Factor for PY 2020 (*Filename:* Attachment JNS-1.xls)
JNS-2	Energy Efficiency Cost Recovery Factor Rider (*Filename: Non-Native Format)*
JNS-3(CD)	Workpapers of Jason N. Smith (*Various files on CD)*

DIRECT TESTIMONY
OF
JASON N. SMITH

I. WITNESS IDENTIFICATION AND QUALIFICATIONS

Q. Please state your name and business address.

A. My name is Jason N. Smith. My business address is 790 South Buchanan Street, Amarillo, Texas 79101.

Q. On whose behalf are you testifying in this proceeding?

A. I am filing testimony on behalf of Southwestern Public Service Company ("SPS"), a New Mexico corporation and wholly owned subsidiary of Xcel Energy Inc.

Q. By whom are you employed and in what position?

A. I am employed by SPS as a Pricing Analyst.

Q. Please briefly outline your responsibilities as Pricing Analyst.

A. My primary responsibilities include the development of new rate design proposals and modifications to existing rate structures to comply with regulatory requirements in SPS's Texas and New Mexico retail jurisdictions.

Q. Please describe your educational background.

A. I graduated from Texas Tech University in 2010 with a Bachelor of Business Administration degree in Management and Marketing. I have also completed course work toward an M.B.A. at West Texas A&M University and expect to graduate in May 2019.

Q. Please describe your professional background.

A. I have been employed by SPS since February 2016 as a Pricing Analyst. I began my career in December 2010 as a small business owner. Prior to my employment with SPS, I operated and managed a restaurant; assisted small business owners and aspiring entrepreneurs with management, marketing, and accounting activities through the West Texas A&M University Small Business Development Center; and served as Assistant Operations Manager for Kimrad Transportation, LP, where my responsibilities included rate quotes, and the overall efficiency of the operations department.

Q. Have you attended or taken any special courses or seminars relating to public utilities?

A. Yes. I attended and completed the Edison Electric Institute's Electric Rates Advanced course.

Q. Please describe your experience with SPS's previous proceedings regarding cost allocation and rate design issues.

A. I submitted pre-filed testimony in SPS's last Energy Efficiency Cost Recovery Factor ("EECRF") filing, Docket No. 48324. In that docket, I provided testimony that supported the allocation of cost among classes eligible for energy efficiency programs and proposed a rate design for the recovery of the 2019 EECRF Plan.

I also submitted pre-filed testimony in SPS's last net refund docket, Docket No. 47035. In that docket, I performed the calculations supporting SPS's request for authority to implement a net refund. I also provided the calculations supporting the surcharge or refund factors by class.

I also submitted pre-filed testimony in SPS's TCRF recoupment docket, Docket No. 48886. In that docket, I performed the calculations supporting SPS's request for authority to implement a net surcharge. In addition, I provided the calculations supporting the surcharge or refund factors by class.

I participated in SPS's previous EECRF filings by assisting with cost allocation and rate design issues. In addition to these filings, I have also assisted with cost allocation and rate design issues in SPS's 2015, 2016, and 2017 Texas and New Mexico rate cases.

II. ASSIGNMENT AND RECOMMENDATIONS

Q. What are your assignments in this proceeding?

A. I discuss SPS's current EECRF. I also describe and quantify the elements of SPS's proposed EECRF for Program Year ("PY") 2020. In particular, I:

- support the allocation of costs among rate classes eligible to participate in the energy efficiency programs whose costs are recovered through the EECRF;
- support the billing determinants in PY 2020 and the EECRF rate design;
- discuss SPS's PY 2018 net over-recovery balance;
- discuss SPS's compliance with the customer cost caps imposed by 16 Tex. Admin. Code ("TAC") § 25.182 ("Rule 25.182"); and
- sponsor the EECRF tariff rider for PY 2020.

In support of my testimony, I provide Attachment JNS-1, which reflects the calculation of SPS's PY 2020 EECRF, and Attachment JNS-2, which contains the EECRF tariff rider reflecting the adjusted rates. In addition, I provide the workpapers that I used to complete my testimony and attachments in Attachment JNS-3(CD).

Q. What recommendations do you make in this proceeding?

A. I recommend that the Public Utility Commission ("Commission") adopt the overall EECRF cost allocation and rate design that I sponsor in this testimony. Those rates accurately reflect SPS's projected EECRF costs for PY 2020 and are within the cost caps prescribed by Rule 25.182.

Q. Were Attachments JNS-1 through JNS-3(CD) prepared by you or under your direct supervision and control?

A. Yes.

III. SPS'S CURRENT EECRF

Q. Does SPS currently have a Commission-approved EECRF in place?

A. Yes. SPS currently charges the EECRF rates approved in Docket No. 48324 to its eligible customers.[1]

Q. What are the effective dates for SPS's current EECRF approved in Docket No. 48324?

A. The effective dates of SPS's current EECRF are January 1, 2019 through December 31, 2019.

[1] *Application of Southwestern Public Service Company to Adjust its Energy Efficiency Cost Recovery Factor*, Docket No. 48324, Final Order (Sept. 27, 2018).

IV. ELEMENTS OF SPS'S PROPOSED PY 2020 EECRF

Q. How much does SPS seek to recover through its 2020 EECRF?

A. SPS seeks Commission approval to recover $4,933,146 through its EECRF for PY 2020, which is January 1, 2020 through December 31, 2020. These costs are summarized in Attachment JNS-1, page 1, lines 1-7.

Q. What are the elements of costs that comprise the $4,933,146 of EECRF costs?

A. The elements of costs in the PY 2020 EECRF are:

- SPS's forecasted energy efficiency costs in PY 2020 (including forecasted incentives, research and development ("R&D"), and administrative costs) of $4,444,530;[2]
- Projected Evaluation, Measurement & Verification ("EM&V") expenses for PY 2019 in the amount of $34,848;
- $200,266 net over-recovery, including interest,[3] of PY 2018 energy efficiency costs;
- $47,001 of rate case expenses incurred in Docket No. 48324, SPS's 2018 EECRF proceeding; and
- SPS's performance bonus of $607,033 earned in accordance with Rule 25.182(e), which is discussed in the Direct Testimony of SPS Witness Jeremy M. Lovelady.

Q. Do SPS's base rates recover any of the 2020 energy efficiency program or other expenses SPS is seeking permission to recover in this proceeding?

A. No. SPS's base rates do not recover any of the energy efficiency expenses that will be recovered through the EECRF in PY 2020.

[2] $4,047,400 incentives + $154,060 program-specific administrative costs + $203,070 general administrative costs + $40,000 R&D.

[3] $194,318 in net over-recovery + $5,948 in interest.

Q. Please explain SPS's request for EM&V expenses for PY 2019.

A. As discussed in Mr. Lovelady's direct testimony, EM&V costs are the costs allocated to SPS by the Commission for the efforts undertaken by the independent program evaluator to update the deemed savings in the Technical Reference Manual ("TRM") and review program performance. Total EM&V costs proposed by the third-party implementer, TetraTech for PY 2019 (to be incurred in 2020 calendar year) are $34,848.

Q. How did you determine SPS's net over-recovery balance of $194,318 in PY 2018?

A. Please refer to Attachment JNS-1, page 4. In PY 2018, SPS recovered a total of $4,883,633 (Column A) in revenue under the EECRF tariff, compared to $3,879,684 (Column H) of spending on energy efficiency programs,[4] for an over-recovery of PY 2018 program expenditures of $1,003,949 (Column A – Column H). That over-recovery is reconciled with the 2016 net under-recovery of $35,135 from Docket No. 47117, which consists of program cost under-recovery of $1,359 (Column F) combined with $33,777 in Docket No. 45916 EECRF rate case expenses (Column B), and an approved bonus of $774,495 (Column D) authorized for recovery in Docket No. 47117. Because the 2016 rate case expenses and bonus amounts were determined in the 2017 EECRF proceeding they were recovered through the 2018 EECRF Rider and are reconciled in this

[4] The $3,876,880 reflects the total amount spent, minus the $5,759.30 in annual incentive program expenses that SPS has removed from its request. If the annual incentive program amounts are included, SPS total program spending is $3,882,640.

proceeding. The reconciliation results in a net over-recovery balance of $194,318 (Column I).[5]

Q. Does the net over-recovery balance of $194,318 for PY 2018 include SPS's rate case expenses incurred in Docket No. 48324?

A. No. In Docket No. 48324, SPS's 2018 EECRF proceeding, SPS incurred $47,001 of expenses. Please refer to Attachment JNS-1, page 5. Under Rule 25.182(d)(1)(A), the utility's over-recovery or under-recovery amount includes the utility and municipal EECRF proceeding expenses. Adding that amount to the PY 2018 over-recovery balance yields a total net over-recovery for PY 2018 of $147,317.[6]

Q. What is the difference between the net over-recovery balance of $194,318 for PY 2018 and the net over-recovery balance of $200,266 for PY 2018 included in the PY 2020 EECRF costs?

In accordance with Rule 25.182(d)(2), SPS has included $5,948 in interest in the net over recovery balance of $200,266 included for PY 2018 included in the PY 2020 EECRF costs. Please refer to Attachment JNS-1, page 4. The calculation of the interest for the two-year period allowed by Rule 25.182(d)(2) is shown in columns (J) and (K).

[5] $1,003,949 - $1,359 - $33,777 - $774,495 = $194,318.

[6] Attachment JNS-1, page 1, columns (b) - (c), $194,318 - $47,001.

V. ALLOCATION OF EECRF COSTS

Q. How did you allocate the PY 2020 energy efficiency program costs?

A. First, I segregated the energy efficiency costs between residential and commercial programs, as shown in Attachment JNS-1, page 2. Of the $4,201,460 in budgeted direct program and administrative costs,[7] $2,176,685 is for residential programs and $2,024,775 is for commercial programs. Commercial program costs are then allocated based on program eligibility of the individual commercial classes. If eligible, a class is assigned a weighted share of program costs, based upon its share of PY energy and demand. In addition, I allocated $203,070 in general administration costs, $40,000 in R&D costs, and $34,848 in EM&V costs to the residential and commercial programs based on their respective shares of the direct program budget, 51.90% residential and 48.10% commercial. In total, I assigned $2,320,932 to residential customers and $2,158,445 to commercial customers for a total of $4,479,378 in PY 2020 costs recoverable under the EECRF.

Q. Are any residential program costs allocated to commercial customers?

A. Yes. 95% of Home Lighting Market Transformation Program ("MTP") costs are allocated to Residential Service customers, and 5% are allocated to the Small General Service customers.

Q. Why are 5% of the Home Lighting MTP costs allocated to commercial customers?

A. Implementation guidance in the Commission's TRM for PY 2017 recommends a 5% allocation of upstream lighting program benefits and costs to commercial

[7] $4,047,400 Budgeted Incentives + $154,060 Program-specific administrative costs.

customers with the remaining 95% allocated to residential customers.[8] The TRM concludes that a small percentage of upstream lighting program incentives are for the purchase of lighting used by small commercial customers. The split in the Home Lighting MTP results in a $13,195 allocation to Small General Service customers.

Q. Other than 5% of the Home Lighting MTP costs, are residential program costs allocated to residential customers?

A. Yes.

Q. Are there any pilot programs allocated to residential customers?

A. Yes, both of the pilot programs discussed by SPS Witness J. Derek Shockley, the Smart Thermostat MTP Pilot and the Refrigerator Recycling MTP Pilot, are residential programs allocated to residential customers.

Q. What are the considerations in the allocation of commercial program costs?

A. In allocating commercial program costs, I excluded industrial customers taking service at 69 kilovolts ("kV") or higher because those customers are not eligible for program participation. I also excluded the coincident peak ("CP") demand and kilowatt-hours ("kWh") of customers that satisfied the opt-out requirements set forth in 16 TAC § 25.181(u) ("Rule 25.181").

SPS does not design its commercial energy efficiency programs by EECRF rate class, so PY 2020 program costs are allocated to eligible Commercial EECRF rate classes according to a 50/50 weighting of forecasted CP demand and forecasted kWh sales. Because the energy efficiency programs are designed to

[8] Texas Technical Reference Manual, Vol. 5, page 4-5.

reduce both peak demand and energy, a 50/50 weighted allocation between CP and kWh is reasonable, and consistent with the Commission's final order approving SPS's current EECRF in Docket No. 48324. The allocation of commercial program costs is shown on Attachment JNS-1, page 5.

Q. Did SPS take system line losses into consideration in its allocation of costs to the EECRF rate classes?

A. Yes. It is necessary to consider line losses because power and energy are lost between the power source (i.e., a generating station) and the customer's meter, especially as the voltage-level at which the customer takes service is reduced. Accounting for line losses is also consistent with how SPS allocates capacity and energy costs in base rate filings, the most recently-completed base rate case being Docket No. 47527.[9]

Q. What line loss factors did SPS use in its cost allocation?

A. SPS used the line loss factors approved in Docket No. 47527, which are shown in the following table:

[9] *Application of Southwestern Public Service Company for Authority to Change Rates*, Docket No. 47527, Final Order (Dec. 10, 2018).

Table JNS-1

Service Level	Energy Loss Factor	Demand Loss Factor
Service Level 1 (Source Voltage)	1.000000	1.000000
Service Level 2 (115 kV and higher)	1.029633	1.023667
Service Level 3 (69 kV)	1.035919	1.030961
Service Level 4 (Primary Voltage Service)	1.105898	1.131015
Service Level 5 (Secondary Voltage Service at Transformer)	1.125047	1.161769
Service Level 6 (Secondary Voltage with distribution service line)	1.128389	1.166539

Q. How did you apply the line loss factors?

A. I applied the line loss factors to the meter-level forecasted kWh and CP kilowatts ("kW") to arrive at line loss-adjusted kWh and CP kW. Line loss-adjusted kWh and CP kW are then used to allocate EECRF costs among commercial rate class customers. Please refer to Attachment JNS-1, pages 2 and 3, lines 17-23 for the calculation.

Q. To which EECRF rate classes did SPS allocate energy efficiency costs?

A. SPS allocated PY 2020 energy efficiency costs to residential and commercial EECRF rate classes that received services under the programs in PY 2018 in accordance with Rule 25.182(c)(2) and (d)(2).

Q. How did you determine which rate classes to use for this proceeding?

A. Rule 25.182(d)(2) allows the Commission to set an EECRF for "each eligible rate class" and requires that costs be directly assigned to each EECRF rate class that receives services under the energy efficiency program to the maximum extent reasonably possible. Subsection (c)(2) of Rule 25.182 defines "rate class" for the purpose of calculating EECRF rates as "those retail rate classes approved in the

utility's most recent base-rate proceeding, excluding non-eligible customers."

Q. What is SPS's most recent base rate proceeding?

A. SPS's most recent base rate proceeding is Docket No. 47527.

Q. Did the Commission in its final order in Docket No. 47527 approve retail rate classes for the purposes of SPS's EECRF?

A. Yes. In Docket No. 47527, the Commission approved a settlement in which SPS agreed that for all its EECRF cases filed before the final order in SPS's next base-rate case becomes final, SPS will propose to use the same classes approved in Docket No. 45916, SPS's 2016 EECRF proceeding. Those classes are as follows:

- Residential Service;
- Small General Service;
- Secondary General Service;
- Primary General Service;
- Small Municipal and School Service;
- Large Municipal Service; and
- Large School Service.

Q. Do SPS's proposed EECRF rate classes for PY 2020 comply with Rule 25.182(d)(2), Rule 25.182(c)(2), and the Commission's Final Order in Docket No. 47527?

A. Yes. SPS proposes to set an EECRF rate for the seven EECRF rate classes ordered by the Commission in Docket No. 47527. SPS does not propose to set an EECRF rate for the Large General Service – Transmission, 69-115kV; Large General Service – Transmission, 115kV+; Municipal and State Street Lighting; or Guard- and Flood-lighting Service because all of the customers in those rate

classes are non-eligible customers.

Q. Is SPS's proposal to set seven EECRF rates consistent with its approach in other SPS EECRF proceedings?

A. Yes, it is consistent with the method SPS has used to allocate costs in previous EECRF filings, and most recently approved by the Commission in Docket No. 48324.

Q. How are rate case expenses from Docket No. 48324 allocated to the EECRF rate classes?

A. The $47,001 of rate case expenses are allocated to each EECRF rate class in proportion to its actual 2018 program costs incurred. Please refer to Attachment JNS-1, page 5.

Q. How will the net over-recovery balance be reflected in PY 2020 EECRF rates?

A. Costs recoverable through the 2020 EECRF for each EECRF rate class will be adjusted by the amount of the PY 2018 net over/under-recovery from each EECRF rate class. Please refer to Attachment JNS-1, page 1.

Q. How will the performance bonus be reflected in PY 2020 EECRF rates?

A. Costs recoverable through the 2020 EECRF for each EECRF rate class will be increased by the amount of the PY 2018 performance bonus from each EECRF rate class.

Q. How was the performance bonus allocated to each EECRF rate class?

A. Consistent with the rule, bonus amounts were allocated in proportion to the program costs associated with meeting the demand and energy goals and allocated to eligible customers on a rate class basis.

VI. RATE DESIGN OF EECRF

Q. After costs are allocated to the appropriate EECRF rate classes, what is the next step in the EECRF calculation?

A. The next step is to divide the allocated PY 2020 costs by the forecasted billing determinants for each eligible rate class to calculate EECRF rates. As explained later in this section, SPS is proposing to recover EECRF costs through a kWh-based energy charge. KWh-based EECRF rates are consistent with EECRF charges currently and in previous years. The forecasted kWh EECRF billing units are reflected in Attachment JNS-1, page 1.

Q. Do the forecasted kWh sales developed for this docket assume normal weather conditions?

A. Yes. Normal daily weather was based on the average of the last ten years of historical heating-degree days and cooling-degree days. The heating-degree days and cooling-degree days were weighted by the number of times a particular billing cycle day was included in a billing month. These weighted heating-degree days and cooling-degree days were divided by the total billing cycle days to arrive at average daily heating-degree days and cooling-degree days for a billing month.

Q. Did SPS adjust the forecasted billing determinants to account for line losses?

A. No. It is not necessary to adjust the forecast for line losses because meter-level data is developed in the SPS forecasts, which is the same level at which SPS customers are billed.

Q. Rule 25.182(d)(10)(E) also requires the utility to provide the billing determinants for the most recent year. What were SPS's billing determinants for 2018?

A. The actual billing determinants for 2018 are shown in Attachment JNS-1, page 4. Those billing determinants were not weather-normalized because the amounts billed under the PY 2018 EECRF are based upon actual kWh, not weather-normalized kWh.

Q. Is the entire difference between the forecasted PY 2020 billing determinants and the actual 2018 billing determinants attributable to weather-normalization?

A. No. Other factors, such as the changing mix of customers and changes in how customers use electricity also affect forecasted 2020 kWh compared to 2018 actual kWh.

Q. Does Rule 25.182 prescribe the types of billing determinants to be used for billing the EECRF?

A. Yes. Under Rule 25.182(d)(6), the utility can impose only energy charges for residential customers and for those commercial classes whose base rates do not provide for demand charges. For the commercial classes whose base rates do provide for demand charges, the EECRF rates can provide for energy charges or demand charges, but not both. If an EECRF charge is based upon demand, a demand ratchet mechanism cannot be applied to the EECRF.

Q. How does SPS propose to bill its customers for the EECRF?

A. SPS does not charge demand rates for its Residential Service, Small General Service, and Small Municipal and School Service rate classes. Therefore, under Rule 25.182(d)(6), SPS must recover the EECRF amounts from those rate classes using a kWh-based energy charge. Although SPS charges demand rates in addition to kWh energy rates under its Secondary General, Primary General, Large Municipal, and Large School rate classes, SPS proposes to use an energy charge (per kWh) only for recovery of energy efficiency costs from those classes as well. An energy charge is appropriate, in part, because some of the costs recovered through the EECRF are for programs aimed at reducing energy consumption. In addition, for billing and rate design purposes, the rule states the maximum charge in kWh terms, so it is easier to determine whether the rate is in compliance with the maximum rate per kWh if the rate itself is kWh-based.

Q. How were the EECRFs for the various rate classes determined using PY 2020 projected billing units?

A. After quantifying the EECRF class energy efficiency revenue requirements and projected 2020 kWh billing units excluding industrial and opt-out customers, SPS calculated the EECRF for each rate class by dividing costs recoverable through the EECRF by the projected 2020 billing units for each rate class. Please refer to Attachment JNS-1, page 1, lines 1-7. The resulting EECRFs will be applied to each retail customer's 2020 billed kWh.

Q. What EECRF rates does SPS propose for PY 2020?

A. Based upon the calculations described above, the proposed PY 2020 EECRFs are as shown in Table JNS-2:

Table JNS-2

PY 2020 EECRF ($/kWh) by Rate Class	
EECRF Rate Class	**PY 2020 EECRF**
Residential Service	$ 0.001055
Small General Service	$ 0.001021
Secondary General Service	$ 0.000575
Primary General Service	$ 0.000358
Small Municipal and School Service	$ 0.001319
Large Municipal Service	$ 0.000056
Large School Service	$ 0.000818

These factors also appear on Attachment JNS-1, page 1.

VII. COMPLIANCE WITH CUSTOMER COST CAPS

Q. Does Rule 25.182 establish any limits on the total EECRF charged to customers?

A. Yes. Rule 25.182(d)(7) sets maximum limits on the amounts that can be charged to retail customers for energy efficiency programs.

Q. Please describe the customer cost caps set forth in Rule 25.182(d)(7).

A. Rule 25.182 Subsection (d)(7)(C) states:

> For the 2019 program year and thereafter, the residential and commercial cost caps shall be calculated to be the prior period's cost caps increased or decreased by a rate equal to the most recently available calendar year's percentage change in the South urban [consumer price index ("CPI")], as determined by the Federal Bureau of Labor Statistics.

Q. What are the customer cost caps in place for PY 2019?

A. SPS's EECRF cost caps for the 2019 PY are $0.001303 per kWh for residential customers and $0.000815 per kWh for commercial customers.

Q. Have you determined the most recently available calendar year's percentage change in the South urban CPI?

A. Yes. The cumulative percentage change in the South urban CPI for calendar year 2018 over calendar year 2017 was 2.22 percent.

Q. Have you calculated SPS's customer cost caps for PY 2020?

A. Yes. Applying the cumulative percentage change in the South urban CPI for calendar year 2018 over calendar year 2017 of 2.22 percent to SPS's 2019 EECRF cost caps, as required by Rule 25.182(d)(7)(C), results in EECRF cost caps for PY 2020 of $0.001332 per kWh for residential customers, and $0.000833

per kWh for commercial customers. This calculation is shown on Attachment JNS-1, page 1.

Q. What is the basis for determining whether proposed EECRF rates are in excess of the cost caps for PY 2020?

A. The caps are based upon the recovery of 2020 program costs, excluding EM&V costs, and do not include recovery of prior year under or over-recovered balances.

Q. Do the EECRF rates requested by SPS in this proceeding exceed the caps?

A. No.

Q. What is the expected impact of SPS's proposed EECRF rates on a residential customer's monthly bill?

A. The amount billed to a residential customer using 1,000 kWh of electricity per month would decrease by approximately $0.15 per month as compared to the EECRF currently in place.[10] That residential customer is charged $1.21 per month under the current EECRF, and $1.06 per month under the proposed EECRF.

[10] Proposed EECRF = $0.001056 x 1,000 kWh = $1.06. Current EECRF: $0.001208 x 1,000 kWh = $1.21.

VIII. TARIFF REVISIONS

Q. Have you included an updated EECRF tariff rider that reflects SPS's proposed rates for PY 2020?

A. Yes. Please refer to Attachment JNS-2.

Q. Does this conclude your pre-filed direct testimony?

A. Yes.

AFFIDAVIT

STATE OF TEXAS)
)
COUNTY OF POTTER)

JASON N. SMITH, first being sworn on his oath, states:

I am the witness identified in the preceding testimony. I have read the testimony and the accompanying attachments and am familiar with their contents. Based upon my personal knowledge, the facts stated in the testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the testimony are true, valid, and accurate.

Jason Smith
JASON N. SMITH

Subscribed and sworn to before me this 26 day of April, 2019 by JASON N. SMITH.

Cindy Baeza
Notary Public, State of Texas
My Commission Expires: 10-06-2020

CINDY BAEZA
Notary Public, State of Texas
Notary ID #13078365-0
My Commission Expires 10-06-2020

CERTIFICATE OF SERVICE

I certify that on May 1, 2019, this instrument was filed with the Public Utility Commission of Texas, and a true and correct copy of it was served on the Staff of the Public Utility Commission of Texas by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

Southwestern Public Service Company

Calculation of EECRF Rates for PY 2020

Line No.	EECRF Class	(a) Allocated 2020 Program Costs	(b) Plus/minus Under/(Over) Recovery of 2018 PY Costs (w/Interest)	(c) Plus: Docket No. 48324 Rate Case Expenses	(d) Plus: Performance Bonus	(e) Net Under/(Over) Recovery of 2018 Costs	(f) Net Recoverable Costs in 2020 Program Year(1)	(g) Divided by: Net Forecast 2020 EECRF Metered kWh	(h) = 2020 EECRF per kWh
1	Residential	$ 2,320,932	$ (119,919)	$ 23,235	$ 300,086	$ 203,402	$ 2,524,335	2,392,559,730	$ 0 001055
2	Small General Service	69,607	183,299	2,883	37,229	223,410	293,017	286,956,427	$ 0 001021
3	Secondary General Service	648,859	398,653	12,583	162,508	573,744	1,222,603	2,126,077,934	$ 0.000575
4	Primary General Service	1,342,610	(724,798)	7,511	97,009	(620,278)	722,332	2,016,445,446	$ 0.000358
5	Small Municipal and School Service	3,234	21,820	52	677	22,549	25,783	19,551,292	$ 0 001319
6	Large Municipal Service	64,324	(55,460)	67	870	(54,523)	9,801	176,300,410	$ 0 000056
7	Large School Service	29,812	96,139	670	8,654	105,463	135,275	165,281,178	$ 0 000818
8		$ 4,479,378	$ (200,266)	$ 47,001	$ 607,033	$ 453,768	$ 4,933,146	7,183,172,418	

Excluding Under/(Over) Recovery of 2018 Costs:

	EECRF Class	Allocated 2020 Program Costs, excluding EM&V and 2018 EECRF Rate Case Expenses	Divided by: Net Forecast 2020 EECRF Metered kWh	2020 Program Costs per kWh	Less than 2020 Cap?	Grouped Commercial Rate[2]	Less than 2020 Cap?
9	Residential	$ 2,302,845	2,392,559,730	$ 0 000963	*yes*	*n/a*	
10	Small General Service	69,070	286,956,427	$ 0 000241	*yes*	$ ***0.000447***	*yes*
11	Secondary General Service	643,834	2,126,077,934	$ 0 000303	*yes*	$ ***0.000447***	*yes*
12	Primary General Service	1,332,164	2,016,445,446	$ 0 000661	*yes*	$ ***0.000447***	*yes*
13	Small Municipal and School Service	3,209	19,551,292	$ 0 000164	*yes*	$ ***0.000447***	*yes*
14	Large Municipal Service	63,825	176,300,410	$ 0 000362	*yes*	$ ***0.000447***	*yes*
15	Large School Service	29,582	165,281,178	$ 0.000179	*yes*	$ ***0.000447***	*yes*
16		$ 4,444,530	7,183,172,418				

Maximum Rates:

	EECRF Class	2020 Base EECRF, before CPI Adjustment	CPI - South Urban, 2018 ÷ 2017	Maximum 2020 EECRF, adjusted for CPI
17	Residential	$ 0 001303	1 02223991	$ 0 001332
18	Commercial	$ 0 000815	1 02223991	$ 0 000833
19		2018 CPI Factor	= 242 737	
20		2017 CPI Factor	÷ 237 456	
21		CPI Adjustment Factor	1 02223991	

[1] = Allocated 2020 Program Costs + Net Under/(over) Recovery of 2018 PY Costs

[2] = Sum of Costs, lines 10 through 15 – Sum of Metered kWh, lines 10 through 15

Southwestern Public Service Company

Allocation of Budgeted PY 2020 Costs

Line No.	Program	(a) 2020 Budgeted Incentives	(b) 2020 Program-Specific Admin	(c) Allocation of 2020 General Administrative Costs	(d) Allocation of 2020 R&D	(e) Allocation of 2019 EM&V	(f) Total Allocated 2020 Program Costs	
1	**Commercial**	**$ 1,946,680**	**$ 78,095**	**$ 97,671**	**$ 19,238**	**$ 16,761**	**$ 2,158,445**	48 10% Commercial Share of Budget
2	Commercial & Industrial SOP	390,200	44,730	19,577	3,856	3,360	461,723	
3	Recommissioning MTP	977,600	-	49,049	9,662	8,417	1,044,728	
4	Load Management SOP	167,000	27,405	8,379	1,650	1,438	205,872	
5	Small Commercial MTP	400,000	5,460	20,069	3,953	3,444	432,926	
6	Home Lighting MTP	11,880	500	596	117	102	13,195	
7	**Residential**	**1,150,720**	**56,855**	**57,735**	**11,373**	**9,908**	**1,286,591**	51 90% Residential Share of Budget
8	Residential SOP	600,000	34,965	30,104	5,930	5,166	676,165	
9	Home Lighting MTP	225,720	9,500	11,325	2,231	1,943	250,719	
10	Smart Thermostat MTP Pilot	50,000	3,675	2,509	494	430	57,108	
11	Refrigerator Recycling MTP Pilot	275,000	8,715	13,798	2,718	2,368	302,598	
12	**Hard-to-Reach**	**950,000**	**19,110**	**47,664**	**9,388**	**8,179**	**1,034,342**	
13	Hard-to-Reach	500,000	19,110	25,086	4,941	4,305	553,442	
14	Low-Income Weatherization	450,000	$ -	22,578	4,447	3,874	480,899	
15	**Total**	**$ 4,047,400**	**$ 154,060**	**$ 203,070**	**$ 40,000**	**$ 34,848**	**$ 4,479,378**	

C&I SOP = Large Commercial SOP

R&D and EM&V costs are allocated according to each program's share of total incentive costs (consistent with Company request)

	Assignment of Residential Costs	Residential SOP	Home Lighting MTP	Smart Thermostat MTP Pilot	Refrigerator Recycling MTP Pilot	Hard-to-Reach	Low-Income Weatherization	Total
16	Residential	$ 676,165	$ 250,719	$ 57,108	$ 302,598	$ 553,442	$ 480,899	$ 2,320,932

Allocation of Commercial Budget

Eligibility of Commercial EECRF Classes for Programs

	Commercial EECRF Class	C&I SOP	Retro-Cmsn MTP	Load Mgt. SOP	Small Comm MTP	Home Lighting MTP
17	Small General Service	No	No	Yes	Yes	Yes
18	Secondary General Service	Yes	Yes	Yes	Yes	Yes
19	Primary General Service	Yes	Yes	Yes	Yes	Yes
20	Small Municipal and School Service	No	No	Yes	Yes	Yes
21	Large Municipal Service	Yes	Yes	Yes	Yes	Yes
22	Large School Service	Yes	Yes	Yes	Yes	Yes
23	Total	$ 461,723	$ 1,044,728	$ 205,872	$ 432,926	$ 13,195

Southwestern Public Service Company

Allocation of Budgeted PY 2020 Costs

Allocation of Budget to Eligible Customer EECRF Classes

Line No.	Commercial EECRF Class	C&I SOP - Alloc.	Retro-Cmsn. MTP - Alloc.	Load Mgt. SOP - Alloc.	Small Comm. MTP - Alloc	Home Lighting MTP - Alloc	SubTotal	Allocation of R&D	Allocation of EM&V	Total
24	Small General Service	$ -	$ -	$ 14,452	$ 41,026	$ 12,976	$ 68,455	$ 616	$ 537	$ 69,607
25	Secondary General Service	89,889	203,042	97,455	247,682	-	638,067	5,767	5,025	648,859
26	Primary General Service	353,072	797,525	74,777	94,799	-	1,320,174	11,990	10,446	1,342,610
27	Small Municipal and School Service	-	-	825	2,355	-	3,180	29	25	3,234
28	Large Municipal Service	11,547	26,082	7,650	17,973	-	63,252	573	499	64,324
29	Large School Service	-	-	7,624	21,694	-	29,318	264	230	29,812
30	Total	$ 454,507 49	$ 1,026,649	$ 202,784	$ 425,529	$ 12,976	$ 2,122,446	$ 19,238	$ 16,761	$ 2,158,445

*Note Net 4-CP kW proj 2020 and net 2020 proj kWh do not include opt-out customers
Allocation adjusted to reflect to the extent which customers in Sec Gen, Pri Gen, Large Muni, Large School are eligible for Small Commercial SOP

		Net 4-CP kW 2020 Proj		
		Small	Large	Total
31	Small General Service	71,224	-	71,224
32	Small Municipal and School Service	3,489	-	3,489
33	Large Municipal Service	27,473	5,862	33,335
34	Large School Service	35,129	-	35,129
35	Secondary General Service	398,699	47,764	446,463
36	Primary Service	123,312	155,243	278,556
		659,325	208,870	868,195

		Net Proj 2020 Line Loss-adjusted kWh		
		Small	Large	Total
37	Small General Service	323,798,476		323,798,476
38	Small Municipal and School Service	22,061,463		22,061,463
39	Large Municipal Service	163,450,434	34,878,464	198,328,898
40	Large School Service	185,895,365	-	185,895,365
41	Secondary General Service	2,136,039,703	255,897,899	2,391,937,602
42	Primary Service	987,179,543	1,242,803,443	2,229,982,986
43		3,818,424,983	1,533,579,806	5,352,004,789
44				

Southwestern Public Service Company

Calculation of Net Under/Over Recovery for PY 2018

Line No.	Rate Class	(A) Actual 2018 Collections	(B) Docket No 45916 EECRF Rate Case Expenses Recovered in 2018	(C) Actual Collections Less RCE (A-B=C)	(D) 2016 Bonus	(E) Actual Collections Less Bonus (C-E=F)	(F) 2016 Under/(Over) Recovery	(G) Actual Collections Less Over Recovery (E-F=G)	(H) 2018 Actual Costs (page 6)	(I) 2018 Under/(Over) Collected	(J) 2018 (Over)/Under Recovery with 2018 Interest	(K) 2018 (Over)/Under Recovery with 2018 & 2019 Interest
1	Residential	$ 2,429,632	$ 17,204	$ 2,412,428	$ 394,486	$ 2,017,941	$ (16,333)	$ 2,034,274	$ 1,917,917	$ (116,357)	$ (117,579)	$ (119,918 57)
2	Small General Service	56,239	114	56,125	2,622	53,503	(6,580)	60,083	237,938	177,855	179,722	183,299
3	Secondary General Service	1,313,343	7,949	1,305,394	182,275	1,123,119	471,303	651,815	1,038,628	386,813	390,875	398,653
4	Primary General Service	450,776	3,073	447,703	70,467	377,237	(946,043)	1,323,279	620,007	(703,272)	(710,656)	(724,798)
5	Small Municipal & School Service	226,137	2,031	224,106	46,570	177,536	194,383	(16,848)	4,325	21,172	21,394	21,820
6	Large Municipal Service	48,152	222	47,930	5,094	42,836	(16,537)	59,373	5,560	(53,813)	(54,378)	(55,460)
7	Large School Service	359,353	3,183	356,170	72,980	283,190	321,164	(37,974)	55,309	93,284	94,263	96,139
8	**Total**	**$ 4,883,633**	**$ 33,777**	**$ 4,849,856**	**$ 774,495**	**$ 4,075,361**	**$ 1,359**	**$ 4,074,002**	**$ 3,879,684**	**$ (194,318)**	**$ (196,358)**	**$ (200,266)**

Detail on 2018 EECRF Billing

		Billed in 2018 kWh
9	Residential	2,508,099,424
10	Small General Service	305,537,687
11	Secondary General Service	2,210,265,086
12	Primary General Service	2,025,081,871
13	Small Municipal and School Service	21,111,916
14	Large Municipal Service	185,157,638
15	Large School Service	165,639,979
16		7,420,893,602

Southwestern Public Service Company

Allocation of PY 2018 Costs

Allocation of EECRF Rate Case Expenses, based in part upon
Allocation of Commercial Program Administrative, General Administrative, R&D and EM&V

Line No		(a) 2018 Program Costs Before AIP Adjustment	(b)	(c) Allocated Rate Case Expenses	(d) Allocated Performance Bonus
	Rate Case Expenses From Docket No. 48324			**$ 47,001**	**$ 607,033**
1	Residential	$ 1,919,378	49 435%	$ 23,235	$ 300,086
2	Small General Service	238,120	6 133%	2,883	37,229
3	Secondary General Service	1,039,419	26 771%	12,583	162,508
4	Primary General Service	620,479	15 981%	7,511	97,009
5	Small Municipal and School Service	4,328	0 111%	52	677
6	Large Municipal Service	5,564	0 143%	67	870
7	Large School Service	55,351	1 426%	670	8,654
8		**$ 3,882,640**	100 000%	**$ 47,001**	**$ 607,033**

	Commercial Program Administrative, General Administrative, R&D, and EM&V	2018 Program Incentive Costs	Class Share	Allocation of Program Administration, General Administration and R&D	Total
	Commercial SOP				
9	Small General Service	$ 18,296	6 892%	$ 4,129	$ 22,425
10	Secondary General Service	190,239	71 661%	42,934	233,173
11	Primary General Service	10,703	4 032%	2,416	13,119
12	Small Municipal and School Service	1,072	0 404%	242	1,314
13	Large Municipal Service	-	0 000%	-	-
14	Large School Service	45,160	17 011%	10,192	55,351
15		**$ 265,470**	100 000%	**$ 59,912**	**$ 325,383**
	Small Commercial MTP				
16	Small General Service	$ 96,632	24 158%	$ 6,229	$ 102,861
17	Secondary General Service	300,537	75 134%	19,374	319,910
18	Primary General Service	-	0 000%	-	-
19	Small Municipal and School Service	2,831	0 708%	183	3,014
20	Large Municipal Service	-	0 000%	-	-
21	Large School Service	-	0 000%	-	-
22		**$ 400,000**	100 000%	**$ 25,785**	**$ 425,785**
	Load Management SOP				
23	Small General Service	$ -	0 000%	$ -	$ -
24	Secondary General Service	116,400	51 232%	16,781	133,181
25	Primary General Service	110,800	48 768%	15,974	126,774
26	Small Municipal and School Service	-	0 000%	-	-
27	Large Municipal Service	-	0 000%	-	-
28	Large School Service	-	0 000%	-	-
29		**$ 227,200**	100 000%	**$ 32,755**	**$ 259,955**
	Recommissioning SOP				
30	Small General Service	$ 93,900	10 651%	$ 6,155	$ 100,055
31	Secondary General Service	331,432	37 595%	21,723	353,155
32	Primary General Service	451,025	51 161%	29,562	480,587
33	Small Municipal and School Service	-	0 000%	-	-
34	Large Municipal Service	5,222	0 592%	342	5,564
35	Large School Service	-	0 000%	-	-
36		**$ 881,579**	100 000%	**$ 57,781**	**$ 939,360**
	Home Lighting MTP				
30	Small General Service	$ 11,648	100 000%	$ 1,130	$ 12,779
31	Secondary General Service	-	0 000%	$ -	-
32	Primary General Service	-	0 000%	$ -	-
33	Small Municipal and School Service	-	0 000%	$ -	-
34	Large Municipal Service	-	0 000%	$ -	-
35	Large School Service	-	0 000%	$ -	-
36		**$ 11,648**	100 000%	**$ 1,130**	**$ 12,779**
37	Total Commercial Program Costs	**$ 1,785,898**		**$ 177,364**	**$ 1,963,262**

Southwestern Public Service Company

Allocation of AIP Adjustment

Line No.		2018 Actual Costs (page 5)	Percentage
1	Residential	$ 1,919,378	49.4349%
2	Small General Service	$ 238,120	6.1329%
3	Secondary General Service	$ 1,039,419	26.7709%
4	Primary General Service	$ 620,479	15.9809%
5	Small Municipal and School Service	$ 4,328	0.1115%
6	Large Municipal Service	$ 5,564	0.1433%
7	Large School Service	$ 55,351	1.4256%
8		**$ 3,882,640**	**100%**

		AIP Adjustment
9	Residential	$ 1,461
10	Small General Service	$ 181
11	Secondary General Service	$ 791
12	Primary General Service	$ 472
13	Small Municipal and School Service	$ 3
14	Large Municipal Service	$ 4
15	Large School Service	$ 42
16		**$ 2,956**

		2018 Program Costs After AIP Adjustment
17	Residential	$ 1,917,917
18	Small General Service	$ 237,938
19	Secondary General Service	$ 1,038,628
20	Primary General Service	$ 620,007
21	Small Municipal and School Service	$ 4,325
22	Large Municipal Service	$ 5,560
23	Large School Service	$ 55,309
24		**$ 3,879,684**

Southwestern Public Service Company

Calculation of Net Line Loss - Adjusted EECRF kWh

	Based upon kWh Forecast for 2020	(a) Forecasted Metered kWh	(b) Less: Opt-out kWh	(c) Net EECRF kWh	(d) Multiplied by: kWh Line Loss Factor	(e) Net Line Loss-adjusted EECRF kWh
	Commercial EECRF Class					
1	Small General Service	287,691,824	(735,397)	286,956,427	1.128389	323,798,476
2	Secondary General Service	2,160,819,682	(34,741,748)	2,126,077,934	1.125047	2,391,937,602
3	Primary General Service	2,297,600,852	(281,155,406)	2,016,445,446	1.105898	2,229,982,986
4	Small Municipal and School Service	19,551,292	-	19,551,292	1.128389	22,061,463
5	Large Municipal Service	176,300,410	-	176,300,410	see below	198,328,898
6	Large School Service	165,281,178	-	165,281,178	see below	185,895,365
7		5,107,245,239	(316,632,551)	4,790,612,688		5,352,004,789
8	Large Municipal Service	149,332,031	-	149,332,031	1.128389	168,504,622
9	Large Municipal Service - primary	26,968,379	-	26,968,379	1.105898	29,824,276
10	Total Large Municipal Service	176,300,410	-	176,300,410	1.124949	198,328,898
11	Large School Service	162,475,340	-	162,475,340	1.125047	182,792,394
12	Large School Service - primary	2,805,838	-	2,805,838	1.105898	3,102,971
13	Total Large School Service	165,281,178	-	165,281,178	1.124722	185,895,365

Southwestern Public Service Company

Calculation of 4 CP - Commercial Classes for Program Year 2020

Based upon kWh Forecast for 2020	(a)	(b)	(c)	(d)		
	June	July	August	September		**4 CP**
Commercial EECRF Class						
Small General Service	26,830,775	31,912,844	35,548,692	26,500,610		
Less Opt-out kWh	(61,533)	(64,022)	(65,007)	(58,822)		
	26,769,242	31,848,822	35,483,685	26,441,788		
divided by load factor at peak	0 6598	0 6826	0 6462	0 7151		
	40,571,751	46,658,104	54,911,305	36,976,350		
divided by number of hours	720	744	744	720		
= peak kW	56,350	62,713	73,806	51,356		
multiplied by line-loss factor	1 166539	1 166539	1 166539	1 166539		
Coincident Peak kW Demand	65,734	73,157	86,097	59,909		71,224
Secondary General Service	195,720,400	222,900,885	239,074,393	179,919,693		
Less Opt-out kWh	(2,991,349)	(3,210,457)	(3,028,441)	(3,105,265)		
	192,729,051	219,690,428	236,045,952	176,814,428		
divided by load factor at peak	0 6954	0 7620	0 7260	0 7493		
	277,148,477	288,307,648	325,132,165	235,972,812		
divided by number of hours	720	744	744	720		
= peak kW	384,928	387,510	437,006	327,740		
multiplied by line-loss factor	1 161769	1 161769	1 161769	1 161769		
Coincident Peak kW Demand	447,198	450,197	507,700	380,758		446,463
Primary General Service	182,539,963	183,800,517	183,485,626	168,104,178		
Less Opt-out kWh	(23,413,499)	(22,721,763)	(23,815,954)	(24,377,270)		
	159,126,464	161,078,754	159,669,672	143,726,908		
divided by load factor at peak	0 9127	1 0069	0 9091	1 0304		
	174,346,953	159,969,423	175,632,112	139,485,282		
divided by number of hours	720	744	744	720		
= peak kW	242,149	215,013	236,065	193,730		
multiplied by line-loss factor	1 131015	1 131015	1 131015	1 131015		
Coincident Peak kW Demand	273,874	243,183	266,993	219,111	250,790	
Service Agreement 4	13,507,918	14,130,670	15,456,484	13,086,849		
divided by load factor at peak	0 9127	1 0069	0 9091	1.0304		
	14,799,954	14,033,354	17,001,694	12,700,633		
divided by number of hours	720	744	744	720		
= peak kW	20,555	18,862	22,852	17,640		
multiplied by line-loss factor	1 131015	1 131015	1 131015	1 131015		
Coincident Peak kW Demand	23,249	21,333	25,846	19,951	22,595	
Service Agreement 8	2,190,142	3,014,310	3,916,501	3,813,003		
divided by load factor at peak	0 9127	1 0069	0 9091	1 0304		
	2,399,630	2,993,551	4,308,040	3,700,475		
divided by number of hours	720	744	744	720		
= peak kW	3,333	4,024	5,790	5,140		
multiplied by line-loss factor	1 131015	1 131015	1 131015	1 131015		
Coincident Peak kW Demand	3,769	4,551	6,549	5,813	5,171	278,556
Small Municipal and School Service	1,513,102	1,807,648	1,926,703	1,609,482		
divided by load factor at peak	0 6893	0 8464	0 8322	0 7627		
	2,195,129	2,135,691	2,315,192	2,110,243		
divided by number of hours	720	744	744	720		
= peak kW	3,049	2,871	3,112	2,931		
multiplied by line-loss factor	1 166539	1 166539	1 166539	1 166539		
Coincident Peak kW Demand	3,557	3,349	3,630	3,419		3,489

Southwestern Public Service Company

Calculation of 4 CP - Commercial Classes for Program Year 2020

Based upon kWh Forecast for 2020	(a)	(b)	(c)	(d)		
	June	July	August	September		**4 CP**
Commercial EECRF Class						
Large Municipal Service	13,408,531	16,014,409	16,381,720	13,837,870		
divided by load factor at peak	0 8594	0.7779	0 8623	0 9205		
	15,602,201	20,586,720	18,997,704	15,032,993		
divided by number of hours	720	744	744	720		
= peak kW	21,670	27,670	25,535	20,879		
multiplied by line-loss factor	1.166539	1 166539	1 166539	1 166539		
Coincident Peak kW Demand	25,279	32,279	29,787	24,356	27,925	
Large Municipal Service (primary voltage)	2,626,643	3,337,244	3,253,681	2,684,058		
divided by load factor at peak	0 8594	0 7779	0 8623	0 9205		
	3,056,368	4,290,069	3,773,259	2,915,870		
divided by number of hours	720	744	744	720		
= peak kW	4,245	5,766	5,072	4,050		
multiplied by line-loss factor	1 131015	1 131015	1 131015	1 131015		
Coincident Peak kW Demand	4,801	6,522	5,736	4,580	5,410	33,335
Large School Service	14,567,588	13,908,732	13,753,078	15,732,735		
divided by· load factor at peak	0 6960	0 6486	0 7337	0 6126		
	20,930,443	21,444,236	18,744.825	25,681,905		
divided by. number of hours	720	744	744	720		
= peak kW	29,070	28,823	25,195	35,669		
multiplied by line-loss factor	1 161769	1 161769	1 161769	1 161769		
Coincident Peak kW Demand	33,773	33,486	29,270	41,440	34,492	
Large School Service (primary voltage)	233,099	293,306	292,762	282,582		
divided by· load factor at peak	0 6960	0 6486	0 7337	0 6126		
	334,913	452,213	399,021	461,283		
divided by number of hours	720	744	744	720		
= peak kW	465	608	536	641		
multiplied by line-loss factor	1 131015	1 131015	1 131015	1 131015		
Coincident Peak kW Demand	526	687	607	725	636	35,129
						868,195

Xcel Energy℠
SOUTHWESTERN PUBLIC SERVICE

ELECTRIC TARIFF

ENERGY EFFICIENCY COST RECOVERY FACTOR RIDER

APPLICABILITY: To all Texas retail Customers taking service at a metered Point of Delivery less than 69 kV, and to all non-profit Customers and governmental entities, including educational customers, in addition to all other charges under the applicable rate schedule. Not applicable to Industrial Customers that have timely provided appropriate Identification Notice to the Company, as described in 16 Tex. Admin Code § 25.181(u).

RATE: All estimated or metered kWh is charged the rate applicable to the EECRF rate class, as listed below:

Rate Schedule		$/kWh
Residential Service	$	0.001055
Small General Service	$	0.001021
Secondary General Service	$	0.000575
Primary General Service[1]	$	0.000358
Small Municipal and School Service	$	0.001319
Large Municipal Service	$	0.000056
Large School Service	$	0.000818

[1] Primary General Service includes tariff sheets IV-61 and IV-99.

Effective January 1, 2020

DIRECTOR OF REGULATORY AND PRICING ANALYSIS

Southwestern Public Service Company

Workpapers of Jason N. Smith

PUCT DOCKET NO. _____

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

Attachment JNS-3(CD)