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SOAH DOCKET NO. 473-19-6677  
PUC DOCKET NO. 49831

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APPLICATION OF SOUTHWESTERN §  
PUBLIC SERVICE COMPANY FOR §  
AUTHORITY TO CHANGE RATES §

BEFORE THE STATE OFFICE  
OF PUBLIC UTILITY COMMISSION  
ADMINISTRATIVE HEARINGS  
FILING CLERK

**OFFICE OF PUBLIC UTILITY COUNSEL'S  
SIXTH REQUEST FOR INFORMATION TO  
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Pursuant to 16 Texas Administrative Code ("TAC") § 22.144, the Office of Public Utility Counsel ("OPUC") submits this Sixth Request for Information to Southwestern Public Service Company ("SPS"). OPUC requests that SPS provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F). OPUC further requests that SPS provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

**Definitions**

1. "SPS," the "Company," "Applicant," "You," and "Your" refer to Southwestern Public Service Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. "Document" and "documents" include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

### **Instructions**

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries, or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

**Claim of Privilege**

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

**SOAH Docket No. 473-19-6677**  
**PUC Docket No. 49831**  
**OPUC's Sixth Request for Information to**  
**Southwestern Public Service Company**

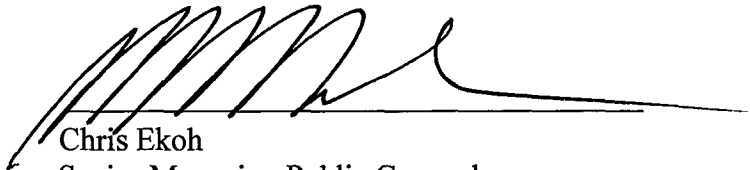
- 6-1.** Please reference Exhibit SPS-OPUC 2-9. Please provide copies of each of the business unit scorecards referenced on page 1 of 2.
- 6-2.** Please reference Exhibit SPS-OPUC 2-12(f). Please provide a description of the line item numbering used in the second column.
- 6-3.** Please reference Exhibit SPS-OPUC 2-12(f). Please explain why incentive "I Deliver" and/or "Innovators" awards would be negative.
- 6-4.** Please reference Exhibit SPS-OPUC 2-18 (CD), Tabs "In-Service AIP Pvt" and "In-Service NBV Data-Fin." Please reconcile the total book cost column on Tab "In-Service NBV Data-Fin" with the total book value column total on Tab "In-Service AIP Pvt." Please include in your response the rationale for excluding some of the workorders.
- 6-5.** Please reference Exhibit SPS-OPUC 1-7 (Conf). With respect to the Company's adjustment to reflect the Annual Incentive Plan compensation at 100% of target (prior to the adjustment for the trigger), please provide the following information:
  - a. Confirm or deny the "I Deliver" and "Innovator" incentive awards are included when determining the 100% at target amounts by employee. If deny, please explain.
  - b. Confirm or deny that when the actual awards to employees were less than 100%, the Company used 100% in the Company's computation. If confirm, please explain.
  - c. Computation of the 180.71% and how it is applied to each of the employees included on Exhibit SPS-OPUC 1-7 (Conf).
- 6-6.** Please reference Exhibit SPS-OPUC 1-7 (Conf). Please provide the total number of employees for each target percentage that were included in the test year awards for AIP compensation.
- 6-7.** Please reference SPS's responses to OPUC 4-8 and OPUC 2-5. Please reconcile the per books SPS AIP compensation of \$1,544,229, referenced in subsection (b) of OPUC 4-8, with the SPS AIP per books amount of \$1,806,153 shown in the chart on OPUC 2-5.
- 6-8.** Please reference APF-RR-6 (CD), SPS Eliminate Wholesale Account Manager. Please explain the line item "Annual Inc OH Alloc." In your response, please confirm or deny there are similar amounts related to each of the employees who receive annual incentive compensation. If confirm, please explain how the annual incentive overhead allocation amounts have been adjusted to reflect the adjustment to annual incentive compensation.
- 6-9.** Please reference Exhibit SPS-OPUC 2-1 (HS) and ML-RR-5(V) (HS). Please explain the differences in the annual fees included in each of the contracts. Please include in your response a description of the pricing line items on page 252 of ML-RR-5(V) (HS).

- 6-10.** Please reference Exhibit SPS-OPUC 2-2 (HS). Please provide the following information:
- a. number of turbines included in the invoice;
  - b. rate per turbine for operations;
  - c. rate per turbine for maintenance; and
  - d. period covered by the invoice.
- 6-11.** Please reference SPS's response to OPUC 2-8. Please provide a schedule that details the base rate treatment of the Coal Handling Assets at Tolk Station included in this filing. Please include the plant in service amount by FERC account, the accumulated depreciation, any ADIT, proposed depreciation rate, and resulting depreciation expense.
- 6-12.** Please reference SPS's response to OPUC 3-3. Please provide a schedule that lists any additional capital expenditures related to the Hale Wind Project from June 30, 2019 to the most current monthly information available. Please include in your response a description of the capital expenditures.

November 14, 2019

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 14th day of November 2019, by facsimile, electronic mail, and/or first class, U.S. Mail.



Chris Ekoh