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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE OF
PUBLIC SERVICE COMPANY FOR §
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS

SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO TEXAS INDUSTRIAL ENERGY CONSUMERS'
EIGHTH REQUEST FOR INFORMATION
QUESTION NOS. 8-1 AND 8-2

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Southwestern Public Service Company ("SPS") files this response to Texas Industrial Energy Consumers' ("TIEC") Eighth Request for Information, Question Nos. 8-1 and 8-2.

I. WRITTEN RESPONSES

SPS's written responses to TIEC's Eighth Request for Information are 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. In accordance with 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 under 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) 370-2891. 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 Leila Melhem at Winstead PC, 401 Congress Avenue, Suite 2100, Austin, Texas 78701; telephone number (512) 370-2891; facsimile transmission number (512) 370-2850; email address lmelhem@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.

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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. TIEC 8-1:

Please refer to CONFIDENTIAL Exhibit AXM 5-27.A15, cells AH117-AJ117. Each of those cells has a comment that references XXXXXXXXXXXXXXXXXXXXXXXX. Please provide the referenced five year forecast in native format with all formulas live.

RESPONSE:

Please refer to Exhibit SPS-TIEC 7-1(CONF)(CD) for the forecast referenced in Exhibit SPS-AXM 5-27. SPS has provided only the years requested in this request for cells AH117-AJ117, 2019-2021.

Preparer: Kaydra Kirtz
Sponsor: Sarah W. Soong

QUESTION NO. TIEC 8-2:

Referring to page 17 of the Direct Testimony of Mr. Kopp:

- a. Please state whether the dismantling study presented in this case assumes specific means and methods for dismantling SPS's plants in developing its cost estimates.
- b. If the response to subsection (a) of this question is yes, please provide, for each of SPS's plants, a detailed narrative explanation of the specific means and methods of dismantling that are assumed.
- c. If the response to subsection (a) of this question is yes, please explain how the assumed specific means and methods make use of the following:
 - i. High reach excavators
 - ii. Large demolition trailers
 - iii. Shears
 - iv. Grapplers
 - v. Hydraulic hammers
 - vi. Excavators
 - vii. Bulldozers
 - viii. Cranes
 - ix. Concrete-crushing machinery
- d. If the response to subsection (a) of this question is yes, please provide a detailed explanation of how the cost of using each of the items asked about in subsection (c) of this question is reflected in the cost estimate.

RESPONSE:

- a. The study assumed that each site would be dismantled as a single project, allowing for demolition means and methods to be employed rather than "reverse construction" means and methods or selective demolition means and methods.
- b. As stated in the SPS Dismantling Study, provided as Attachment JTK-RR-2 to the Direct Testimony of Jeffrey T. Kopp, several of the specific means and methods that could be employed are summarized therein on Attachment JTK-RR-2 pages 17 through 19 (Vol. RR2, pages 547 through 549 of 579). Also, as stated on page 17 of

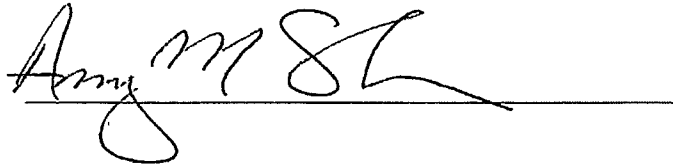
Mr. Kopp's direct testimony (Vol. RR2, page 498 of 579), "At the time SPS decides to decommission the plants, its dismantling contractor will determine the means and methods by which the dismantling will occur. It will be the contractor's responsibility to determine means and methods that result in safely decommissioning and dismantling the Plants at the lowest possible cost. However, based on our experience with dismantling projects, discussions with demolition contractors, and discussions with other Xcel Energy utilities and other utilities throughout the United States, the cost estimates we prepared are reflective of what contractors would bid, through a competitive bidding process given the option to select safe and efficient means and methods."

- c. It will be the contractor's responsibility to determine if and how to make use of each piece of equipment listed in subsection (c) above. While assumptions were made that full site demolition means and methods would be employed as opposed to "reverse construction" or selective demolition means methods, specific means and methods, for each structure, piece of equipment, and other facilities at the site were not assumed.
- d. For each structure, piece of equipment, and other facilities at each site, Burns & McDonnell estimated quantities of concrete, debris, steel, copper, or other material based on a visual inspection of the facilities, reviews of engineering drawings, an in-house database of plant equipment quantities, and professional judgment. For each of those quantities, productivity rates were applied for demolition to determine the number of labor hours required. Pricing for labor and equipment for the B-8 crew from RS Means was then applied to each labor hour estimate to determine total labor and equipment rental costs. As stated in the response to part (c), it will be the contractor's responsibility to determine if and how to make use of each piece of equipment listed as Burns & McDonnell did not assume specific means and methods, for each structure, piece of equipment, and other facilities at the site. However, the labor hours and equipment rental costs estimated for demolition activities are consistent with each site being dismantled as a single project, allowing for demolition means and methods to be employed rather than "reverse construction" means and methods or selective demolition means and methods.

Preparer: Jeffrey T. Kopp
Sponsor: Jeffrey T. Kopp

CERTIFICATE OF SERVICE

I certify that on the 25th day of November, 2019, a true and correct copy of the foregoing instrument was served on all parties of record by electronic service and by either hand-delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

A handwritten signature in cursive script, appearing to read "Amy M. St. Leger", is written over a horizontal line.