



Control Number: 49831



Item Number: 401

Addendum StartPage: 0

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

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**COMMISSION STAFF'S FOURTEENTH REQUEST FOR INFORMATION
TO SOUTHWESTERN PUBLIC SERVICE COMPANY
QUESTION NOS. STAFF 14-1 THROUGH 14-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, 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 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.

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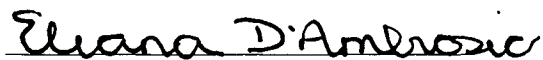
Dated: January 3, 2020

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Thomas S. Hunter
Division Director

Heath D. Armstrong
Managing Attorney

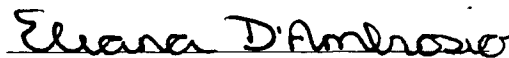


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CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on January 3, 2020, in accordance with 16 TAC § 22.74.



Eleanor D'Ambrosio

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DEFINITIONS

- 1) "SPS," "Company" or "you" refers to 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.

- 2) "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 14-1 For each radial transmission line, please indicate the retail classes on that line that (a) take service on the portion of the line designated as wholesale (i.e., not considered radial for cost allocation purposes, pooled with the costs of networked lines), and (b) do not take service on the portion of the line designated as retail only (i.e., the “considered-radial” portion, the costs of which are allocated among the retail classes). Under SPS’s proposal, is a retail class allocated a share of the costs of a radial line when both conditions stated above are true for that class and radial line? Please explain.
- Staff 14-2 Please explain how SPS’s proposed methodology to split the costs of a radial transmission line between wholesale (pooled with network costs) and retail only (considered radial for class cost allocation purposes) is consistent with (a) cost causation, (b) Commission precedent, and (c) the Commission’s transmission pricing policies.
- Staff 14-3 Did the Commission ever adopt a class cost of service study for SPS in which radial transmission lines were treated differently from networked lines for the purpose of class cost allocation? If yes, please provide the docket number and the cost study.