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SOAH DOCKET NO. 473-21-1892
DOCKET NO. 51802

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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 OFFICE OF PUBLIC UTILITY COUNSEL'S
TWELFTH REQUEST FOR INFORMATION
QUESTION NOS. 12-1 AND 12-2

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SOAH Docket No. 473-21-1892

PUC Docket No. 51802

Southwestern Public Service Company's Response to
Office of Public Utility Counsel's Twelfth Request for Information

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DOCKET NO. 51802**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE OF
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**SOUTHWESTERN PUBLIC SERVICE COMPANY'S
RESPONSE TO OFFICE OF PUBLIC UTILITY COUNSEL'S
TWELFTH REQUEST FOR INFORMATION
QUESTION NOS. 12-1 AND 12-2**

Southwestern Public Service Company ("SPS") files this response to Office of Public Utility Counsel's ("OPUC") Twelfth Request for Information, Question Nos. 12-1 and 12-2. In accordance with the Commission's *Order Suspending Rules* entered in Docket No. 50664, SPS has provided notice, by email, to all parties that SPS's Responses to OPUC's Twelfth Request for Information and accompanying exhibits (excluding voluminous and exhibits provided pursuant to the protective order) have been filed with the Commission and are available for download from the Commission's Interchange website. In addition, SPS has posted SPS's Response to OPUC's Twelfth Request for Information and all accompanying exhibits (including Voluminous, Confidential and Highly Sensitive exhibits) on SPS's file sharing platform. SPS's notice includes a link to SPS's file sharing platform.

I. WRITTEN RESPONSES

SPS's written responses to OPUC's Twelfth 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 600 Congress Avenue, Suite 2000, Austin, Texas 78701; telephone number (512) 721-2700. Voluminous exhibits will also be provided on SPS’s file sharing platform.

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. Access to Confidential and Highly Sensitive materials will be available on SPS’s file sharing platform to 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, Jeffrey Stuart at Eversheds Sutherland (US) LLP, 600 Congress Avenue, Suite 2000, Austin, Texas 78701; telephone number (512) 721-2700; facsimile transmission number (512) 721-2656; email address jeffreystuart@eversheds-sutherland.com 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 Mr. Stuart at (512) 721-2700 or jeffreystuart@eversheds-sutherland.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

WINSTEAD PC

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Respectfully submitted,

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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. OPUC 12-1:

Please refer to SPS's response to OPUC RFI No. 3-7. Please provide the same detailed annual incentive plan ("AIP") compensation information that was requested in OPUC RFI No. 3-7 for the period ending December 31, 2020. Please provide this information for each SPS employee as well as for each XES employee who has labor related expenses charged to SPS in the revenue requirements. Please be sure to include the following information:

- a. Total annual incentive compensation awarded to the employee during the updated test year;
- b. Base salary on which the awarded incentive compensation was computed for the updated test year;
- c. Annual target percentage for each employee;
- d. Actual percentage awarded during the updated test year for each employee and confirmation on whether the pay was greater than 100% of the target;
- e. Actual amounts awarded separately for the "I Deliver" and "Innovator" awards; and
- f. Total amount of the annual incentive compensation included in the updated revenue requirements.

RESPONSE:

- a. - e. Please refer to Exhibit SPS-OPUC 12-1(V)(CONF) for XES employee total amounts. Refer to Exhibit SPS-OPUC 8-8(CONF) for amounts related to SPS employee total amounts. The column labeled "Dec 2019 Base Pay" identifies the employee's base pay at year-end or last base pay as an AIP eligible employee. The base pay amount does not account for proration due to eligibility requirements used to determine the year-end payout.
- f. Please refer to Attachment SNN-RR-U2, Tab TX_105_IS_Lbr_Incent.

Preparers: Michael P. Deselich, Chris Wassell
Sponsors: Michael P. Deselich, Stephanie N. Niemi

QUESTION NO. OPUC 12-2:

Please refer to the Direct Testimony of Ms. Stephanie N. Niemi, page 52. For each non-bargaining employee of XES who charges SPS for services, please provide the following information related to the AIP plan awards included in the per book amounts as of September 30, 2020:

- a. Total annual incentive compensation awarded to the employee during the updated test year;
- b. Base salary on which the awarded incentive compensation was computed for the updated test year;
- c. Annual target percentage for each employee;
- d. Actual percentage awarded during the updated test year for each employee and confirmation on whether the pay was greater than 100% of the target;
- e. Actual amounts awarded separately for the “I Deliver” and “Innovator” awards; and
- f. Total amount of the annual incentive compensation included in the updated revenue requirements.

RESPONSE:

- a. - e. Please refer to Exhibit SPS-OPUC 12-2(a)(V)(CONF) for SPS and XES employee total amounts. The column labeled “Dec 2019 Base Pay” identifies the employee’s base pay at year-end or last base pay as an AIP eligible employee. The base pay amount does not account for proration due to eligibility requirements used to determine the year-end payout.
- f. Please refer to Exhibit SPS-OPUC 12-2(f)(CONF).

Preparers: Michael P. Deselich, Chris Wassell
Sponsors: Michael P. Deselich, Stephanie N. Niemi

CERTIFICATE OF SERVICE

I certify that on the 17th day of May 2021, 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.

/s/ Amy M. Shelhamer