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

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**ALLIANCE OF XCEL MUNICIPALITIES’
TENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Alliance of Xcel Municipalities’ (“AXM”) Tenth Set of Requests for Information ("RFIs") to Southwestern Public Service Company (“SPS”) is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4524 Burnet Road, Austin, Texas 78756, within twenty (20) days of service hereof or no later than **August 5, 2021**. Exhibit A is attached hereto and incorporated herein for all purposes.

Definitions

1. “SPS,” the “Company,” and “Applicant” refer to Southwestern Public Service Company and its affiliates.
2. “You,” “yours,” and “your” refer to SPS (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. “Document” and “documents” mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, 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 and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.
4. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item.

Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SPS.

5. "Identification" of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. "Identification" of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. "Person" refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

Instructions

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.
4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.

5. If SPS considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SPS receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

HERRERA LAW & ASSOCIATES, PLLC

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**ATTORNEYS FOR ALLIANCE OF XCEL
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July 2021, a true and correct copy of the ***Alliance of Xcel Municipalities' Tenth Set of RFIs to SPS*** was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey
Leslie Lindsey

EXHIBIT A

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

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

**ALLIANCE OF XCEL MUNICIPALITIES’
TENTH SET OF REQUESTS FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

- 10-1. Please provide SPS’s O&M budget for each power plant for 2021 and 2022.
- 10-2. Please provide SPS’s budget for transmission O&M for 2021 and 2022.
- 10-3. Please provide SPS’s budget for distribution O&M for 2021 and 2022.
- 10-4. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500LDC, Wheeling Lamar DC Tie charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-5. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500MISC, Wheeling Miscellaneous charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-6. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500S11, Wheeling Schedule 11 charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-7. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500S12, Wheeling Schedule 12 charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-8. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500S9, Wheeling Schedule 9 charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-9. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 56500S9W,

Wheeling Schedule 9 - Wholesale charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.

- 10-10. Reference the response to AXM 1-17, please explain and provide justification for the relatively large increase in transmission O&M expenses in FERC Account 565Z2DAUC, Z2 Direct Assigned Upgrade charges, and provided the Texas Retail allocation of charges in this account requested by SPS in this case.
- 10-11. Please provide the coal inventory level tons, days full load burn, and dollar inventory value for each SPS coal-fired generating plant as of year-end for the last three calendar years, and as requested by SPS in this case on a Total Company and Texas Retail basis.
- 10-12. Please provided the estimated extraordinary costs incurred by SPS for each day and total of the February 2021 winter weather event, along with supporting workpapers for the cost estimate.
- 10-13. Please provide the energy supply mix (MWh and percentage of total MWh) for the SPS system by resource type (e.g., coal, natural gas, purchased energy, wind energy) during the test year and during the February 2021 winter weather event.
- 10-14. Please discuss any new initiatives under evaluation or planned by SPS to mitigate damages related to extreme weather such as the February 2021 winter weather event.
- 10-15. Please provide the MWh and average cost of fuel (\$/MWh) supplied from each SPS generating unit for each day of the February 2021 winter weather event.
- 10-16. Please provide the date, duration, root cause and MWh lost for each forced outage incurred by SPS during February of 2021.
- 10-17. Please provide SPS's planned outage schedule including start date and end date of outages during February 2021.
- 10-18. Please provide SPS's system weighted average cost of gas for each day of February 2021.
- 10-19. Please provide the volume (MWh) and average cost of energy (\$/MWh) purchased by SPS from the SPP IM for each day of February 2021.
- 10-20. Please provide regulatory filings by SPS to recover costs of the February 2021 winter weather event.
- 10-21. Please provide documentation of SPS's winterization and freeze protection program for each power plant.
- 10-22. Please provide SPS's O&M and capital costs for winterization and freeze protection for each power plant for each of the last four calendar years and for 2021 to date.

- 10-23. Reference SPS's response to AXM 3-11, please provide the date of each of the referenced economic analyses along with the underlying natural gas price forecast and SPP IM energy price forecasts used for each analysis.
- 10-24. Please provide the forecasted annual generation for each SPS generating unit for each of the next five calendar years as reflected in the Company's current base case IRP analysis.
- 10-25. Please provide SPS customer complaints in the Texas service area regarding distribution or transmission service reliability for each of the last five calendar years, including the test year.
- 10-26. Please provide any tariffs or terms and conditions offered by SPS in Texas that would allow customers who seek higher than standard service reliability to acquire such service, along with the number of customers who have elected to take service under such tariffs.