

Filing Receipt

Received - 2021-08-06 01:30:33 PM Control Number - 51802

ItemNumber - 366

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

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE OF
PUBLIC SERVICE COMPANY FOR	§	
AUTHORITY TO CHANGE RATES	8	ADMINISTRATIVE HEARINGS

SOUTHWESTERN PUBLIC SERVICE COMPANY'S RESPONSE TO COMMISSION STAFF'S TENTH REQUEST FOR INFORMATION QUESTION NO. 10-1

(Filename: SPSRespStaff10th.doc; Total Pages: 8)

I. WRITTEN RESPONSES	2
II. INSPECTIONS	 3
RESPONSES	 6
QUESTION NO. STAFF 10-1:	 6
CERTIFICATE OF SERVICE	 7
EXHIBITS ATTACHED:	
SPS-Staff 10(CD)	 8

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

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 COMMISSION STAFF'S TENTH REQUEST FOR INFORMATION QUESTION NO. 10-1

Southwestern Public Service Company ("SPS") files this response to Commission of Texas Staff's ("Staff") Tenth Request for Information, Question No. 10-1. 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 Staff's Tenth 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 Staff's Tenth 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 Staff's Tenth 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

SOAH Docket No. 473-21-1892

PUC Docket No. 51802

(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

Ron H. Moss

State Bar No. 14591025

401 Congress Avenue, Suite 2100

Austin, Texas 78701

Office: (512) 370-2867

Facsimile: (512) 370-2850

e-mail: rhmoss@winstead.com

Respectfully submitted,

XCEL ENERGY SERVICES INC.

Francis W. DuBois

State Bar No. 24115340

Mark A. Walker

State Bar No. 20717318

XCEL ENERGY SERVICES INC.

919 Congress Ave., Ste. 900

Austin, Texas 78701-2471

Office: (512) 236-6923

Facsimile: (512) 236-6935

email: will.w.dubois@xcelenergy.com

email: mark.a.walker@xcelenergy.com

EVERSHEDS SUTHERLAND (US) LLP

Lino Mendiola III

State Bar No. 00791248

Jeffrey B. Stuart

State Bar. No. 24066160

Michael Boldt

State Bar No. 24064918

600 Congress Avenue, Suite 2000

COURTNEY, COUNTISS, BRIAN & BAILEY, LLP

/s/ Amy M. Shelhamer

Amy M. Shelhamer

State Bar No. 24010392

600 S. Tyler, Suite 1700

Amarillo, Texas 79101

SOAH Docket No. 473-21-1892 PUC Docket No. 51802 Southwestern Public Service Company's Response to Commission Staff's Tenth Request for Information Austin, Texas 78701 Office: (512) 721-2700 Facsimile: (512) 721-2656

e-mail: <u>linomendiola@eversheds-sutherland.com</u> e-mail: <u>jeffreystuart@eversheds-sutherland.com</u> e-mail: michaelboldt@eversheds-sutherland.com Office: (806) 372-5569 Facsimile: (806) 372-9761

e-mail: <u>ashelhamer@courtneylawfirm.com</u>

HINKLE SHANOR LLP

Dana S. Hardy*
Post Office Box 2068
Santa Fe, NM 87504-2068
Office: (505) 982-4554

Facsimile: (505) 982-8623 email: dhardy@hinklelawfirm.com

* To be admitted Pro Hac Vice

ATTORNEYS FOR SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. Staff 10-1:

Please provide a Schedule E-U4 (Cash Working Capital) that shows the calculation of Cash Working Capital at the total company level. Please make sure that the total on this Schedule E-U4 at the total company level matches the amount of \$(33,360,493) for Cash Working Capital as presented on Schedule B-U1.

RESPONSE:

Please refer to Exhibit SPS-Staff 10-1(CD).

Preparers: Jessy Hennesy, Chris Wassell

Sponsor: Stephanie N. Niemi

CERTIFICATE OF SERVICE

I certify	that on the	e 6th day	of Augus	t 2021,	notice	of the	filing	of the	forego	oing
instrument with	the PUCT	was served	d on all p	oarties o	f record	by ele	ectronic	service	and	was
posted to SPS's	file sharing	platform.								

/s/ An	ny M. Shelhame	r

The following files are not convertible:

Exhibit SPS-Staff 10-1.xlsx

Please see the ZIP file for this Filing on the PUC Interchange in order to access these files.

Contact centralrecords@puc.texas.gov if you have any questions.