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**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 OFFICE OF PUBLIC UTILITY COUNSEL'S
TWENTY-FIRST REQUEST FOR INFORMATION
QUESTION NOS. 21-1 AND 21-2**

(Filename: SPSRespOPUC21th.doc; Total Pages: 8)

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TWENTY-FIRST REQUEST FOR INFORMATION
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Southwestern Public Service Company ("SPS") files this response to Office of Public Utility Counsel's ("OPUC") Twenty-first Request for Information, Question Nos. 21-1 and 21-2. 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 Twenty-first 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 Twenty-first 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 Twenty-first 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

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*Southwestern Public Service Company's Response to
Office of Public Utility Counsel's Twenty-first Request for Information*

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

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: rhmoos@winstead.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
Austin, Texas 78701
Office: (512) 721-2700
Facsimile: (512) 721-2656
e-mail: linomendiola@eversheds-sutherland.com
e-mail: jeffreystuart@eversheds-sutherland.com
e-mail: michaelboldt@eversheds-sutherland.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

COURTNEY, COUNTISS, BRIAN & BAILEY, LLP

/s/ Amy M. Shelhamer
Amy M. Shelhamer
State Bar No. 24010392
600 S. Tyler, Suite 1700
Amarillo, Texas 79101
Office: (806) 372-5569
Facsimile: (806) 372-9761
e-mail: ashelhamer@courtneylawfirm.com

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

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RESPONSES

QUESTION NO. OPUC 21-1:

Please refer to the RFP, 45-Day Update, Attachment SNN-RR-U2. Please confirm or deny that the “I Deliver” and “Innovator” awards were adjusted to reflect incentive compensation set at 100% of target. If denied, please provide an explanation.

RESPONSE:

Deny. The Innovator and I Deliver awards are not associated with the year-end payment and are not adjusted. For the Innovator and I Deliver awards SPS is requesting Test Year per book amounts. The annual incentive program year-end payment is adjusted to 100% target less 50% for the affordability trigger.

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

QUESTION NO. OPUC 21-2:

Please refer to the RFP, 45-Day Update, Attachment SNN-RR-U2. Please confirm or deny that the “I Deliver” and “Innovator” awards were adjusted to reflect a 50% reduction for the affordability trigger. If denied, please provide an explanation.

RESPONSE:

Deny. As described in Mr. Deselich’s Attachment MPD-RR-2(CONF) page 8 of 11, which describes the annual incentive program and its components, “The funding allocated to the I Deliver and Innovator awards are not subject to an affordability trigger.”

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

CERTIFICATE OF SERVICE

I certify that on the 11th day of August 2021, notice of the filing of the foregoing instrument with the PUCT was served on all parties of record by electronic service and was posted to SPS's file sharing platform.

/s/ Amy M. Shelhamer