

Filing Receipt

Received - 2021-09-02 02:44:19 PM Control Number - 51802 ItemNumber - 514

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 FIRST SUPPLEMENTAL RESPONSE TO ALLIANCE OF XCEL MUNICIPALITIES' TENTH REQUEST FOR INFORMATION QUESTION NO. 10-22

(Filename: SPSRespAXM10th(SUPP1).doc; Total Pages: 8)

I. WRITTEN SUPPLEMENTAL RESPONSES	2
II. INSPECTIONS	3
SUPPLEMENTAL RESPONSES	6
QUESTION NO. AXM 10-22 (AS MODIFIED BY ORDER	R NO. 4):6
CERTIFICATE OF SERVICE	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 FIRST SUPPLEMENTAL RESPONSE TO ALLIANCE OF XCEL MUNICIPALITIES' TENTH REQUEST FOR INFORMATION QUESTION NO. 10-22

Southwestern Public Service Company ("SPS") files this supplemental response to the Alliance of Xcel Municipalities' ("AXM") Tenth Request for Information, Question No. 10-22. 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 AXM'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 Responses to AXM'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 SUPPLEMENTAL RESPONSES

SPS's written supplemental responses to AXM'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

SOAH Docket No. 473-21-1892

PUC Docket No. 51802

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 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,

SOAH Docket No. 473-21-1892

PUC Docket No. 51802

Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48-hour notice of their intent by contacting Jeffrey Stuart at Eversheds Sutherland (US) L.L.P., 600 Congress Avenue, Suite 2000, Austin, Texas 78701; telephone number (512) 721-2700; facsimile transmission number (512) 721-2656; email address jeffreystuart@evershedssutherland.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

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

EVERSHEDS SUTHERLAND (US) LLP

Lino Mendiola III State Bar No. 00791248 Jeffrey B. Stuart State Bar. No. 24066160

Michael Boldt

WINSTEAD PC

Ron H. Moss

State Bar No. 14591025

Austin, Texas 78701

Office: (512) 370-2867

Facsimile: (512) 370-2850

e-mail: rhmoss@winstead.com

401 Congress Avenue, Suite 2100

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 /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

SUPPLEMENTAL RESPONSES

QUESTION NO. AXM 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.

QUESTION NO. AXM 10-22 (AS MODIFIED BY ORDER NO. 4):

Please provide SPS's O&M and capital costs for winterization and freeze protection for each power plant for the Test Year.

SEPTEMBER 2, 2021 SUPPLEMENTAL RESPONSE:

Order No. 4 issued on August 19, 2021, limited Question No. AXM 10-22 to Test Year data.

Accordingly, please refer to the following table for the Updated Test Year O&M and Capital costs for winterization and freeze protection by power plant:

O&M Costs		
(total company)		
Cunningham	\$743	
Hale	\$0	
Harrington	\$28,646	
Jones	\$19,721	
Maddox	\$5,385	
Nichols	\$5,739	
Plant X	\$7,615	
Quay	\$0	
Sagamore	\$0	
Tolk	\$14,201	
Capital Costs		
(total company)		
Cunningham	\$80,227	
Harrington	\$105,979	
Jones	\$859	
Plant X	\$50,606	

Preparers: Danelle Heidingsfelder, Mark Mechenbier

Sponsors: David A. Low, Mark Lytal

CERTIFICATE OF SERVICE

I certify that on the 2nd of September 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