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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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**OFFICE OF PUBLIC UTILITY COUNSEL’S
TWENTY-SECOND REQUEST FOR INFORMATION TO
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144, the Office of Public Utility Counsel (“OPUC”) submits this Twenty-Second Request for Information to Southwestern Public Service Company (“SPS”). OPUC requests that SPS provide answers to the request for information under oath as required by 16 TAC § 22.144(c)(2)(F) within the timeframe specified in the procedural schedule in this proceeding. OPUC further requests that SPS provide an answer to the questions and sub-questions in the order listed below with sufficient detailed information to provide a complete and accurate answer to each question and sub-question.

Definitions

1. “SPS,” the “Company,” “Applicant,” “You,” and “Your” refer to Southwestern Public Service Company and its affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
2. “Document” and “documents” include any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tape, film, electronic facsimile, computer storage device, or any other media, including, but not limited to, electronic mail (e-mail), 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, summaries of interviews, reports of consultants, appraisals,

forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

Instructions

1. The Definitions, Instructions, and Claim of Privilege sections set forth in this request for information apply to these questions.
2. In providing an answer to each question, please furnish all of the information that is in your possession, custody, or control, as defined by Texas Rules of Civil Procedure (Tex. R. Civ. Proc.) 192.7(b), including information in the possession, custody, or control of your affiliates, subsidiaries, and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.
3. Please answer each question based upon your knowledge, information, or belief, and state whether each answer is based upon your knowledge, information, or belief.
4. If you have possession, custody, or control, as defined by Tex. R. Civ. Proc. 192.7(b), of an original requested document, please produce the original requested document or a complete copy of the original requested document and all copies that are different in any way from the original requested document, whether by interlineation, receipt stamp, or notation.
5. If you do not have possession, custody, or control of an original requested document, please produce copies of the document, however made, in your possession, custody, or control. If any requested document is not in your possession, custody, or control, please explain why the document is not in your possession, custody, or control and provide the current location and custodian of the requested document or any copy, summary, or other form of the requested document thereof.
6. If there is any confusion about a question, please contact the undersigned counsel for clarification.
7. In providing your response to a question, please start each response on a separate page and type, at the top of the page, the question that is being answered by the response.
8. As part of the response to each question, please state, at the bottom of the answer to the question, the name and job position of each person(s) who participated in any way, other than by providing clerical assistance, in the preparation of the answer to the question. If

the question has sub-parts, please identify each person(s) by name and job position that participated in any way, other than by providing clerical assistance, in the preparation of the answer for each sub-part of the question.

9. Please state the name of the witness in this docket who will sponsor the answer to the question and/or sub-part of the question and who will swear to the truthfulness of the answer to the question and/or sub-part of the question.
10. Please provide individual responses to questions as each response becomes available, rather than waiting to provide all of the responses to the questions at the same time.
11. These questions are continuing in nature. If there is a change in circumstances or facts or if you receive or generate additional information that changes your answer to a question between the time of your original response and the time of the hearing, then you should submit, under oath, a supplemental response to your earlier answer to the question.
12. If you consider any question to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue. Furthermore, if you object to any question on the grounds that the question seeks confidential information, or on any other grounds, please contact the undersigned counsel, as soon as possible, to discuss the situation and try to resolve the issue.
13. If the response to any question is voluminous, please make available all of the voluminous material at a designated location in Austin. Please provide a detailed index for the voluminous material with your response to the question to enable efficient review of the material. The index should include information sufficient to locate each individual document by page, file, and box number, date of each document, title of each document, description of each document if no document title exists, name of the preparer of each document, and length of each document.
14. If the requested information is included in previously furnished exhibits, workpapers, or responses to other discovery inquiries or otherwise, in hard copy or electronic format, please furnish specific references thereto, including Bates Stamp page citations and detailed cross-references to the previously furnished information.

15. If a question requests the production of copyrighted material, you may provide a list of such material, including the title, publisher, author, edition, and page references relied on or otherwise relevant to the question.

Claim of Privilege

If any document is withheld under any claim of privilege, please provide a list that identifies each document for which a privilege is being claimed, including the date, sender, recipient(s) of the privileged document, recipient(s) of copies of the privileged document, subject matter of the privileged document, and the basis upon which a privilege is being claimed by the Company.

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OPUC's Twenty-Second Request for Information to
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- 22-1.** Please reference the Rebuttal Testimony of Wesley L. Berger at 17:12 – 18:7. Does SPS deliver 174 MW to the Lubbock Power and Light (“LP&L”) metering points?
- 22-2.** Please reference the Rebuttal Testimony of Mr. Berger at 17:12 – 18:7. Does SPS deliver 174 MW to the points at which LP&L is interconnected with SPS’s transmission system?
- 22-3.** Please reference the Rebuttal Testimony of Mr. Berger at 17:12 – 18:7. Please provide LP&L’s monthly metered kWh, maximum metered kW, customer (LP&L) coincident peak kW, and contribution to SPS’s transmission system monthly coincident peak demand by metering point for each month in 2020 for every remaining (i.e., partial requirement) LP&L metering point.
- 22-4.** Please reference the Rebuttal Testimony of Mr. Berger at 18:15 – 19:3 and the Rebuttal Testimony of David A. Low at 11:2 - 12. Please identify the number of hours for every month by unit of the Tolk Generating Station for December 2019 through May 2020 and for December 2020 through May 2021 that each unit operated in synchronous condenser mode. Also, please provide the number of hours in each month that each generating unit was generating power and supplying that power to the SPS transmission system.
- 22-5.** Please reference the Rebuttal Testimony of Mr. Berger at 18:15 – 19:3 and the Rebuttal Testimony of Mr. Low at 11:2 - 12. Please identify the MWh generated and supplied to the transmission system for every month by unit of the Tolk Generating Station for December 2019 through May 2020 and for December 2020 through May 2021.
- 22-6.** Please reference the Rebuttal Testimony of Mr. Low at 11:2 - 12. What is the total amount of time in hours that is required for a Tolk unit that is operating in synchronous condenser mode to supply power to serve loads? The time identified should start from the moment a request is made by the Southwest Power Pool (“SPP”) or a decision is made by Xcel Energy management, whichever is applicable.
- 22-7.** Please reference the Rebuttal Testimony of Mr. Low at 11:2 - 12. What is the total amount of time in hours that is required for a Tolk unit that is operating in synchronous condenser mode to supply its full, rated capacity to serve the grid? The time identified should start from the moment a request is made by SPP or a decision is made by Xcel Energy management, whichever is applicable.
- 22-8.** Please reference the Rebuttal Testimony of Mr. Low at 11:2 - 12. Besides the extreme Winter Event in mid-February 2021, please identify every other period in which one or both Tolk units ceased operating in synchronous condenser mode and were dispatched and operated to provide power to the market. Please identify the specific units involved and the calendar days they were dispatched and operated.
- 22-9.** Please reference the Rebuttal Testimony of Mr. Low at 11:2 - 3. Please identify where in the Direct Testimony of Evan D. Evans he stated that the entire Tolk Generating Station, “operates as a transmission asset for eight months and as a generator for four months of the year?”

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- 22-10.** Please reference the Rebuttal Testimony of Mr. Berger at 18:15 – 19:3 and the Rebuttal Testimony of Mr. Low at 11:2 - 12. Does Mr. Berger or Mr. Low disagree with the Direct Testimony of Jarred J. Cooley at 42:5 – 43:17 in which he discusses the expected operation of the Tolk units in synchronous condenser mode? If so, please identify which portion of that testimony that either Mr. Berger or Mr. Low disagrees with and explain why they do not agree with it.
- 22-11.** Please reference the Rebuttal Testimony of William A. Grant at 20:11 – 22:12. Please identify whether SPS, Xcel Energy or some other party determined the test-year and updated test-year SPS used for this rate case and whether SPS, Xcel Energy or some other party determined when SPS would file this rate case.
- 22-12.** In the direct testimony and rebuttal testimony filed by SPS in Docket No. 46936, did SPS witnesses Mr. William A. Grant, Mr. Wesley L. Berger or both testify that approximately \$165 million was needed to ensure that SPS's remaining customers were held harmless for the movement of LP&L's affected load to ERCOT? If so, did SPS ever amend or rescind that filed testimony?
- 22-13.** Please reference the Rebuttal Testimony of Jarred J. Cooley at 21:18 – 22:6. Please identify the specific characteristics of the SPS system that would cause SPS to have drastically higher demand losses for service at distribution service voltages than El Paso Electric Company, Entergy Texas, Inc., Public Service Company of Colorado or Southwestern Electric Power Company. Please provide a detailed discussion for each characteristic identified and provide a complete explanation how SPS is significantly different from each of those other electric utilities relative to the characteristic identified.
- 22-14.** Please reference the Rebuttal Testimony of Mr. Cooley at 21:18 – 22:6. Please identify the specific characteristics of the SPS system that would cause SPS to have drastically higher energy losses for service at distribution service voltages than El Paso Electric Company, Entergy Texas, Inc., Public Service Company of Colorado or Southwestern Electric Power Company. Please provide a detailed discussion for each characteristic identified and provide a complete explanation how SPS is significantly different from each of those other electric utilities relative to that characteristic.
- 22-15.** In performing SPS's current loss study, did SPS perform a "bottom-up" approach loss calculation to verify its loss calculations prior to finalizing its 2016 loss study? A "*bottom-up*" approach, as used in this context, is where a utility develops the line loadings by first determining loads and losses at each level beginning at a customer's meter service entrance and then going through secondary lines, line transformers, primary lines and finally distribution substations. These distribution system loads and associated losses are then compared to the initial calculated input into distribution substation loadings for reasonableness prior to finalizing the loss factors.

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- 22-16.** Please reference the Rebuttal Testimony of Mr. Cooley at 21:7-17. Is the methodology SPS used in its 2016 Loss Study similar to that employed by Public Service Company of Colorado (“PSCO”) and other Xcel Energy electric operating companies in their most recent system loss studies? Please provide a detailed explanation for this response.
- 22-17.** Please reference the Rebuttal Testimony of Mr. Cooley at 21:7-17. Outside of any reviews that may have been performed by other parties in a base rate case, has SPS requested any third-party experts review of either the results or the methodology employed in SPS’s 2016 Loss Study or SPS’s 2012/2013 loss study. If so, please provides any reports or other documents related to those reviews.
- 22-18.** Please reference the Rebuttal Testimony of Mr. Cooley at 26:5 – 14. Based on his rebuttal testimony, is it Mr. Cooley’s opinion that the major changes to SPS’s generation, transmission, and distribution systems from the end of 2016 through December 31, 2020, did not result in significant changes to the power flows on the SPS transmission system and would not be expected to have a material impact on SPS’s losses? If so, please provide a detailed explanation for Mr. Cooley’s position and all documents that support that position.
- 22-19.** Please reference the Rebuttal Testimony of Mr. Cooley at 26:5 – 14. Based on his rebuttal testimony, is it Mr. Cooley’s opinion that the major changes to SPS’s distribution system from the end of 2016 through December 31, 2020, would not result in material impacts on SPS’s distribution losses? If so, please provide a detailed explanation for Mr. Cooley’s position and all documents that support that position.
- 22-20.** Please reference the Rebuttal Testimony of Mr. Cooley at 26:5 – 14. Is it Mr. Cooley’s opinion that the major changes to SPS’s generation transmission and distribution systems from the end of 2016 through December 31, 2020, other than the two significant additions mentioned by Mr. Cooley, did not result in significant changes to the power flows on the SPS’s system and would not be expected to have a material impact on SPS’s losses? If so, please provide a detailed explanation for Mr. Cooley’s position and all documents that support that position.
- 22-21.** Please reference the Rebuttal Testimony of Mr. Grant at 67:10 – 20. Please provide a copy of the “plan to inform residential space-heating customer that the residential space-heating option was ending and to communicate the value of the residential TOU rider” that SPS was required to file by July 1, 2019, pursuant to Finding of Fact No. 95 in the Final Order in PUCT Docket No. 47527.
- 22-22.** Please reference the Rebuttal Testimony of Mr. Grant at 67:10 – 20. Please provide a copy of the plan to “market the alternative TOU rider” that SPS was required to file by July 1, 2019, pursuant to Finding of Fact (“FOF”) No. 95 in the Final Order in PUCT Docket No. 47527.

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- 22-23.** Please reference the Rebuttal Testimony of Mr. Grant at 68:1 – 6. Is it Mr. Grant's and SPS's position that FOFs 93 and 95 from the Final Order in PUCT Docket No. 47527 and the plans that SPS submitted pursuant to those FOFs did not establish a commitment by SPS to develop and implement those plans? If so, please provide a detailed explanation for Mr. Grant's and SPS's position.
- 22-24.** Please admit or deny that SPS included \$163,598 in its filed sales revenue requirement in Docket No. 49831 for the cost of implementing its "TOU" marketing plan. If the response is anything other than an unqualified admission, please provide a detailed explanation for your response.
- 22-25.** Please admit or deny that SPS included \$14,327 in its filed sales revenue requirement in Docket No. 49831 for the cost of implementing its residential space-heating communication plan. If the response is anything other than an unqualified admission, please provide a detailed explanation for your response.

Dated: September 22, 2021

Respectfully submitted,

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ATTORNEYS FOR THE
OFFICE OF PUBLIC UTILITY COUNSEL

CERTIFICATE OF SERVICE

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I hereby certify that a copy of the foregoing document was served on all parties of record in this proceeding on this 22nd day of September 2021, by facsimile, electronic mail, and/or first class, U.S. Mail.



Tucker Furlow