



Control Number: 52072



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SOAH DOCKET NO. 473-21-2425

PUC DOCKET NO. 52072

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**APPLICATION OF SOUTHWESTERN  
PUBLIC SERVICE COMPANY TO  
ADJUST ITS ENERGY EFFICIENCY  
COST RECOVERY FACTOR**

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**BEFORE THE STATE OFFICE  
OF  
ADMINISTRATIVE HEARINGS**

**COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO SOUTHWESTERN PUBLIC SERVICE COMPANY  
QUESTION NOS. STAFF 1-1 THROUGH 1-2**

The Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Public Service Company (SPS) provide the following information and answer the following questions under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These questions are continuing in nature, and, if there is a relevant change in circumstances, SPS must submit an amended answer, under oath, as a supplement to its original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of that answer.

Provide responses to the Requests for Information by filing with the Commission solely through the Interchange on the Commission's website and provide notice, by email, to all other parties that the pleading or document has been filed with the Commission, unless otherwise ordered by the presiding officer pursuant to the Order Suspending Rules in Docket No. 50664.

Dated: June 7, 2021

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS  
LEGAL DIVISION**

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/s/ Merritt Lander  
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**CERTIFICATE OF SERVICE**

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record on June 7, 2021 in accordance with the Order Suspending Rules filed in Project No. 50664.

/s/ Merritt Lander  
Merritt Lander

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**DEFINITIONS**

- 1) "SPS" or "you" refers to Southwestern Public Service Company and any person acting or purporting to act on its behalf, including, without limitation, attorneys, agents, advisors, investigators, representatives, employees, or other persons.

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**INSTRUCTIONS**

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 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 or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 1-1** Please refer to Attachment JML-5. Specifically, please reference Table 11: Customer Segment and Program. As it relates to Table 11, please provide the following information:
- a. a detailed breakdown of the administrative and research and development costs outlined in Table 11 for the 2020 program year; and
  - b. copies of applicable invoices and contracts.
- Staff 1-2** Please refer to Attachment JML-5. Specifically, please reference Table 7: Proposed Annual Budget Broken Out by Program for Each Cost Class. As it relates to Table 7, please provide the following information:
- a. a detailed breakdown of the research and development costs proposed for the 2021 and 2022 program years; and
  - b. copies of applicable contracts.