



Control Number: 52072



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APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
PUBLIC SERVICE COMPANY TO § OF  
ADJUST ITS ENERGY EFFICIENCY § ADMINISTRATIVE HEARINGS  
COST RECOVERY FACTOR §

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

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**SOAH DOCKET NO. 473-21-2425  
PUC DOCKET NO. 52072**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE  
PUBLIC SERVICE COMPANY TO § OF  
ADJUST ITS ENERGY EFFICIENCY § ADMINISTRATIVE HEARINGS  
COST RECOVERY FACTOR §**

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

Southwestern Public Service Company ("SPS") files this response to Commission Staff's ("Staff") First Request for Information, Question Nos. 1-1 through 1-2.

**I. WRITTEN RESPONSES**

SPS's written responses to Staff's 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 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 1900, Austin, Texas 78701; telephone number (512) 495-8832. Voluminous exhibits will also be provided on CD to any requesting party.

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. Confidential and Highly Sensitive materials will be served on 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, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48 hour notice of their intent by contacting Patrick Pearsall of Duggins Wren Mann & Romero, LLP, 600 Congress Avenue, Suite 1900, Austin, Texas 78701; telephone number (512) 495-8832; facsimile transmission number (512) 744-9399; email address ppearsall@dwmrlaw.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS’s operations as possible.

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*SOAH Docket No. 473-21-2425*

*PUC Docket No 52072*

*Southwestern Public Service Company's Response to  
Commission Staff's First Request for Information*

*- 3-*

XCEL ENERGY SERVICES INC.

Mark A. Walker  
State Bar No. 20717318  
816 Congress Avenue, Suite 1650  
Austin, Texas 78701-2471  
Office: (512) 236-6926  
Facsimile: (512) 236-6935  
e-mail: mark.a.walker@xcelenergy.com

Respectfully submitted,

DUGGINS WREN MANN & ROMERO, LLP

Patrick Pearsall  
State Bar No. 24047492  
600 Congress Avenue, Suite 1900  
Austin, Texas 78701  
Office: (512) 495-8832  
Facsimile: (512) 744-9399  
e-mail: ppearsall@dwmrlaw.com

BY: \_\_\_\_\_/s/ PATRICK PEARSALL\_\_\_\_\_  
ATTORNEYS FOR  
SOUTHWESTERN PUBLIC SERVICE COMPANY

## RESPONSES

### QUESTION NO. 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.

### RESPONSE:

- a. Please refer to Exhibit Staff 1-1(a) for a breakdown of 2020 administrative and Research and Development (R&D) costs for the program year. Administrative costs are also detailed in Attachment JML-4.
- b. Please refer to Exhibit Staff 1-1(b) for copies of the R&D invoices for 2020. Please refer to Exhibit Staff 1-1(b)(CONF) for a copy of the R&D contract agreement and statement of work. The invoices for R&D are related to the 2020 codes and standards study, which was a multi-state project between 3 states (Minnesota, New Mexico, and Texas). Xcel Energy was able to reduce the cost of this project by combining the research across three jurisdictions that have statewide energy codes. SPS has allocated the costs to the jurisdictions in accordance with the size of each jurisdiction's DSM portfolio and anticipated program ramp up. Please refer to Attachment JML-4 to Jeremy M. Lovelady's Direct Testimony for detailed expense receipts pertaining to the administrative costs.

Preparers: Nick Minderman, Julie Herman, Jeremy Lovelady  
Sponsor: Jeremy Lovelady

**QUESTION NO. 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.

**RESPONSE:**

- a. Please refer to Exhibit Staff 1-2(a) for a breakdown of 2021 research and development (R&D) costs incurred year-to-date. A limited amount of work from the 2020 codes project referenced in Staff 1-1 continued into 2021 as the research concluded. SPS has not developed a detailed itemization of the R&D costs proposed for the remainder of 2021 and 2022 program years. The budget in 2021 was established to allow for SPS to finish research and initiate the pilot of a building code support product in Texas as part of a larger company effort to identify efficiencies and costs savings within its program offerings. SPS has allocated 2022 R&D funds to allow for two separate tasks. First is continued work on the pilot effort regarding a codes and standards program. Second, but related, is code compliance research recommended in the 2020 study. The code compliance research will help SPS and its code support implementer understand where buildings underperform current codes and what program-sponsored activities are likely to have a material impact on building performance. During a meeting with the Texas EM&V evaluator, both the proposed pilot experience and the compliance study were identified as important information-gathering steps in anticipation of an eventual TRM submission.
- b. Please refer to Exhibit Staff 1-1(b). Xcel Energy recently closed a request for proposals to solicit a multi-state code support implementer that would include the Texas pilot. A contract has not been awarded at this time.

Preparer: Nick Minderman, Jeremy Lovelady  
Sponsor: Jeremy Lovelady

**CERTIFICATE OF SERVICE**

I certify that on the 25<sup>th</sup> day of June, 2021, a true and correct copy of the foregoing instrument was served on all parties of record by email in accordance with SOAH Order No. 1.

/s/ J. Rich Sparks



**Southwestern Public Service Company**

<b>General Administration</b>				
<b>Internal Order Description</b>	<b>Account Name</b>	<b>Services/Invoice</b>	<b>Amount</b>	<b>JMI-4 Pg. Reference</b>
Misc Recoverable Admn	Empl Exp Meals	Empl Exp Meals	\$ 18 31	2
Misc Recoverable Admn	Empl Exp Meals	Empl Exp Meals	7 58	2
Misc Recoverable Admn	Employee Exp Airfare	Employee Exp Airfare	391 24	3
Misc Recoverable Admn	Employee Exp Airfare	Employee Exp Airfare	384 24	5
Misc Recoverable Admn	Employee Exp Hotel	Employee Exp Hotel	305 37	7
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	8
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	9
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	10
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	11
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	12
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	13
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	14
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	15
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	16
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	17
Misc Recoverable Admn	Pers Comm Devices	Pers Comm Devices	50 00	18
Misc Recoverable Admn	Employee Exp Airfare	Employee Exp Airfare	259 96	19
Misc Recoverable Admn	Employee Exp Airfare	Employee Exp Airfare	26 79	20
Misc Recoverable Admn	Employee Exp Car Rental	Employee Exp Car Rental	105 24	22
Misc Recoverable Admn	Employee Exp Hotel	Employee Exp Hotel	305 37	23
Misc Recoverable Admn	Employee Exp Taxi and Bus	Employee Exp Taxi and Bus	10 50	24
Misc Recoverable Admn	Employee Exp Taxi and Bus	Employee Exp Taxi and Bus	10 50	26
Misc Recoverable Admn	Employee Exp Meals	Employee Exp Meals	15 97	27
Misc Recoverable Admn	Employee Exp Meals	Employee Exp Meals	15 00	27
		Total	\$ 2,406 07	
Misc Recoverable Admn	Labor & Loadings	Program Management Time	133,944 09	
<b>Grand Total</b>			<b>\$ 136,350.16</b>	
<b>Research and Development</b>				
TX Research & Dev	Contracting Services	EMI Consulting	\$ 2,584 04	
TX Research & Dev	Contracting Services	EMI Consulting	6,608 36	
TX Research & Dev	Contracting Services	EMI Consulting	5,059 17	
TX Research & Dev	Contracting Services	EMI Consulting	4,426 75	
TX Research & Dev	Contracting Services	EMI Consulting	5,200 00	
TX Research & Dev	Labor & Loadings	Program Management Time	\$ 238 78	
<b>Total</b>			<b>\$ 24,117.10</b>	

**INVOICE**

**Energy Market Innovations, Inc.**  
 807 E Roy Street, Suite 301  
 Seattle, WA 98102  
 (206) 621-1160

**Xcel Energy**

Invoice Date: 08/31/20  
 Total Amount: \$15,504.25  
 Number: 4994-0820  
 Invoice Period: 08/01/20 - 08/31/20  
 PO Number: 4500657592  
 Terms: Net 30  
 Project: 4994 - Xcel Energy Codes Program  
 Development TX, NM, MN

**INVOICE SUMMARY**

Description	Total Budget	Remaining Budget (\$)	Total Billed (\$)	This Invoice (\$)
Task 1. Planning	\$3,915.00	-\$2,342.25	\$6,257.25	\$6,257.25
Task 2: Needs Assessment	\$58,515.00	\$56,150.00	\$2,365.00	\$2,365.00
Task 3. Develop Program Elements	\$18,514.00	\$18,514.00	--	--
Task 4: Develop Savings Estimation Methodology	\$42,832.00	\$41,795.00	\$1,037.00	\$1,037.00
Task 5: Reporting	\$32,921.00	\$32,921.00	--	--
Task 6: Project Management	\$23,303.00	\$21,343.00	\$1,960.00	\$1,960.00
<b>BUDGET TOTALS</b>	<b>\$180,000.00</b>	<b>\$168,380.75</b>	<b>\$11,619.25</b>	<b>\$11,619.25</b>
Colorado Codes Program Logic Model	\$16,000.00	\$12,115.00	\$3,885.00	\$3,885.00

**TOTAL AMOUNT DUE**

**\$15,504.25**

For this invoice, line item charges are as follows.

10 4000179 Lighting Consulting = \$5,163.59  
 20 4000179 Lighting Consulting = \$4,518.73  
 30 4000179 Lighting Consulting = \$1,936.93

Colorado Codes Program Logic Model = \$3,885.00

Emptoris Number : 54263  
 SAP Number: 4602002753

**INVOICE**



**Energy Market Innovations, Inc.**  
807 E Roy Street, Suite 301  
Seattle, WA 98102  
(206) 621-1160

**Xcel Energy**

Invoice Date: 09/30/20  
Total Amount: \$39,650.15  
Number: 4994-0920  
Invoice Period: 09/01/20 - 09/30/20  
PO Number: 4500657592  
Terms: Net 30  
Project: 4994 - Xcel Energy Codes Program  
Development TX, NM, MN

**INVOICE SUMMARY**

Description	Total Budget	Remaining Budget (\$)	Total Billed (\$)	This Invoice (\$)
Task 1: Planning	\$4,969.00	-\$1,288.25	\$6,257.25	--
Task 2: Needs Assessment	\$49,373.00	\$30,896.00	\$18,477.00	\$16,112.00
Task 3: Develop Program Elements	\$20,013.00	\$20,013.00	--	--
Task 4: Develop Savings Estimation Methodology	\$31,412.00	\$21,730.60	\$9,681.40	\$8,644.40
Task 5: Reporting	\$30,879.25	\$30,879.25	--	--
Task 6: Project Management	\$19,136.00	\$13,904.75	\$5,231.25	\$3,271.25
<b>BUDGET TOTALS</b>	<b>\$155,782.25</b>	<b>\$116,135.35</b>	<b>\$39,646.90</b>	<b>\$28,027.65</b>
Colorado Codes Program Logic Model	\$16,000.00	\$492.50	\$15,507.50	\$11,622.50

**TOTAL AMOUNT DUE**

**\$39,650.15**

For this invoice, line item charges are as follows:

10 4000179 Lighting Consulting = \$2,802.77  
20 4000179 Lighting Consulting = \$12,612.44  
30 4000179 Lighting Consulting = \$12,612.44

Colorado Codes Program Logic Model = \$11,622.50

Emptoris Number : 54263  
SAP Number: 4602002753

**INVOICE**



**Energy Market Innovations, Inc.**  
807 E Roy Street, Suite 301  
Seattle, WA 98102  
(206) 621-1160

**Xcel Energy**

Invoice Date: 10/31/20  
Total Amount: \$30,355.00  
Number: 4994-1020  
Invoice Period: 10/01/20 - 10/31/20  
PO Number: 4500657592  
Terms: Net 30  
Project: 4994 - Xcel Energy Codes Program  
Development TX, NM, MN

**INVOICE SUMMARY**

Description	Total Budget	Remaining Budget (\$)	Total Billed (\$)	This Invoice (\$)
Task 1: Planning	\$3,915.00	-\$2,342.25	\$6,257.25	--
Task 2: Needs Assessment	\$58,515.00	\$26,708.50	\$31,806.50	\$13,329.50
Task 3: Develop Program Elements	\$18,514.00	\$13,513.50	\$5,000.50	\$5,000.50
Task 4: Develop Savings Estimation Methodology	\$42,832.00	\$24,969.60	\$17,862.40	\$8,181.00
Task 5: Reporting	\$32,921.00	\$32,641.00	\$280.00	\$280.00
Task 6: Project Management	\$23,303.00	\$14,507.75	\$8,795.25	\$3,564.00
<b>BUDGET TOTALS</b>	<b>\$180,000.00</b>	<b>\$109,998.10</b>	<b>\$70,001.90</b>	<b>\$30,355.00</b>

For this invoice, line item charges are as follows:

10 4000179 Lighting Consulting = \$3,035.50  
20 4000179 Lighting Consulting = \$22,766.25  
30 4000179 Lighting Consulting = \$4,553.25

Emptoris Number : 54263  
SAP Number: 4602002753



**INVOICE**

**Energy Market Innovations, Inc.**  
807 E Roy Street, Suite 301  
Seattle, WA 98102  
(206) 621-1160

Invoice Date: 11/30/20  
Total Amount: \$42,560.52  
Number: 4994-1120  
Invoice Period: 11/01/20 - 11/30/20  
PO Number: 4500657592  
Terms: Net 30  
Project: 4994 - Xcel Energy Codes Program  
Development TX, NM, MN

**Xcel Energy**

**INVOICE SUMMARY**

Description	Total Budget	Remaining Budget (\$)	Total Billed (\$)	This Invoice (\$)
Task 1: Planning	\$3,915.00	-\$2,342.25	\$6,257.25	--
Task 2: Needs Assessment	\$58,515.00	\$25,826.50	\$32,688.50	\$882.00
Task 3: Develop Program Elements	\$18,514.00	\$2,242.50	\$16,271.50	\$11,271.00
Task 4: Develop Savings Estimation Methodology	\$42,832.00	\$3,675.08	\$39,156.92	\$21,294.52
Task 5: Reporting	\$32,921.00	\$26,727.25	\$6,193.75	\$5,913.75
Task 6: Project Management	\$23,303.00	\$11,308.50	\$11,994.50	\$3,199.25
<b>BUDGET TOTALS</b>	<b>\$180,000.00</b>	<b>\$67,437.58</b>	<b>\$112,562.42</b>	<b>\$42,560.52</b>

For this invoice, line item charges are as follows:

10 4000179 Lighting Consulting = \$8,512.10  
20 4000179 Lighting Consulting = \$27,664.34  
30 4000179 Lighting Consulting = \$6,384.08

Emptoris Number : 54263  
SAP Number: 4602002753

**INVOICE**



Invoice Date: 12/16/20  
 Total Amount: \$31,200.00  
 Number: 4994-1220  
 Invoice Period: 12/01/20 - 12/31/20  
 PO Number: 4500657592  
 Terms: Net 30  
 Project: 4994 - Xcel Energy Codes Program Development TX, NM, MN

**Energy Market Innovations, Inc.**  
 807 E Roy Street, Suite 301  
 Seattle, WA 98102  
 (206) 621-1160

**Xcel Energy**

**INVOICE SUMMARY**

Description	Total Budget	Remaining Budget (\$)	Total Billed (\$)	This Invoice (\$)
Task 1 Planning	\$3,915.00	-\$2,342.25	\$6,257.25	--
Task 2 Needs Assessment	\$58,515.00	\$25,826.50	\$32,688.50	--
Task 3. Develop Program Elements	\$18,514.00	\$467.00	\$18,047.00	\$1,775.50
Task 4. Develop Savings Estimation Methodology	\$42,832.00	\$264.08	\$42,567.92	\$3,411.00
Task 5. Reporting	\$32,921.00	\$2,288.25	\$30,632.75	\$24,439.00
Task 6 Project Management	\$23,303.00	\$9,734.00	\$13,569.00	\$1,574.50
<b>BUDGET TOTALS</b>	<b>\$180,000.00</b>	<b>\$36,237.58</b>	<b>\$143,762.42</b>	<b>\$31,200.00</b>

**APPLY ALL FUNDS TO LINE 10**

For this invoice, line item charges are as follows

10 4000179 Lighting Consulting = \$24,248.46  
 30 4000179 Lighting Consulting - \$4,513.30

Emptoris Number. 54263  
 SAP Number. 4602002753

**Southwestern Public Service Company****Research and Development**

<b>Internal Order Description</b>	<b>Account Name</b>	<b>Services/Invoice</b>	<b>Amount</b>	
TX Research & Dev.	Contracting Services	EMI Consulting	\$	1,141.75
TX Research & Dev.	Contracting Services	EMI Consulting		1,299.08
		<b>Total</b>	<b>\$</b>	<b>2,440.83</b>