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APPLICATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
PUBLIC SERVICE COMPANY TO §
ADJUST ITS ENERGY EFFICIENCY §
COST RECOVERY FACTOR § OF TEXAS

DIRECT TESTIMONY
of
JEREMIAH W. CUNNINGHAM

on behalf of

SOUTHWESTERN PUBLIC SERVICE COMPANY

(filename: CunninghamEECRFDirect.doc; Total Pages:28)

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GLOSSARY OF ACRONYMS AND DEFINED TERMS

<u>Acronym/Defined Term</u>	<u>Meaning</u>
Commission	Public Utility Commission of Texas
DWMR	Duggins, Wren, Mann & Romero, LLP
EECRF	Energy Efficiency Cost Recovery Factor
EEPR	Energy Efficiency Plan and Report
PURA	Public Utility Regulatory Act
PY	Program Year
R&D	Research and Development
RCE	Rate Case Expense
Rule 25.181	16 Texas Administrative Code § 25.181
Rule 25.182	16 Texas Administrative Code § 25.182
Rule 25.245	16 Texas Administrative Code § 25.245
SPS	Southwestern Public Service Company, a New Mexico corporation
Staff	Staff of the Public Utility Commission of Texas
TAC	Texas Administrative Code
TIEC	Texas Industrial Energy Consumers
Xcel Energy	Xcel Energy Inc.
XES	Xcel Energy Services Inc.

LIST OF ATTACHMENTS

<u>Attachment</u>	<u>Description</u>
JWC-1	List of Prior Testimonies (<i>non-native format</i>)
JWC-2	Summary of Rate Case Expenses and Adjustments from Docket No. 50804 (<i>Filename: JWC-2.xlsx</i>)
JWC-3	Rate Case Expenses from Docket No. 50804 Allocated by Phase (<i>Filename: JWC-3.xlsx</i>)
JWC-4(CD)	Workpapers of Jeremiah W. Cunningham (Various files on CD)

**DIRECT TESTIMONY
OF
JEREMIAH W. CUNNINGHAM**

1 **I. WITNESS IDENTIFICATION AND QUALIFICATIONS**

2 **Q. Please state your name and business address.**

3 A. My name is Jeremiah W. Cunningham. My business address is 790 S. Buchanan
4 St., 7th Floor, Amarillo, Texas 79101.

5 **Q. On whose behalf are you testifying in this proceeding?**

6 A. I am filing testimony on behalf of Southwestern Public Service Company, a New
7 Mexico corporation (“SPS”) and wholly-owned electric utility subsidiary of Xcel
8 Energy Inc. (“Xcel Energy”).

9 **Q. By whom are you employed and in what position?**

10 A. I am employed by SPS as Manager – Rate Cases.

11 **Q. Please briefly outline your responsibilities as Manager – Rate Cases.**

12 A. I am responsible for managing the development, filing, and processing of rate
13 cases and other regulatory filings for SPS. More specifically, I direct case teams
14 from various areas within SPS and Xcel Energy Services Inc. (“XES”) and
15 provide direction and overall management support for rate case and other filing
16 preparations. My department facilitates the development of policy issues and
17 advocacy to be included in regulatory filings, and it coordinates the overall
18 preparation of filed testimony, attachments, schedules, and workpapers to produce
19 filings in accordance with applicable rules and procedures in the regulatory
20 jurisdictions in which SPS operates.

1 **Q. Please describe your educational background.**

2 A. I graduated from Southeastern Oklahoma State University with a Bachelor of Arts
3 degree in English in 2003.

4 **Q. Have you attended any courses or seminars related to public utilities?**

5 A. Yes. I have completed the Public Utilities Report Guide training and attended
6 Essentials of Regulatory Finance hosted by S&P Global Market Intelligence.

7 **Q. Please describe your professional experience.**

8 A. After a ten-year career in the field of education, I began my utilities career with
9 SPS in October 2013, as a regulatory administrator.

10 In April 2014, I accepted a promotion to Case Specialist in the Rates and
11 Regulatory Affairs department. In that role, I managed SPS regulatory case
12 filings before the Public Utility Commission of Texas (“Commission”), with an
13 emphasis on energy efficiency and rate-case expenses (“RCEs”). I also assisted
14 with the preparation and prosecution of multiple base-rate cases in both the Texas
15 and New Mexico jurisdictions. In July 2016, I accepted my current position as
16 Manager – Rate Cases.

17 **Q. Have you filed testimony before any regulatory authorities?**

18 A. Yes. A list of my prior testimonies is provided as Attachment JWC-1.

1 **II. TESTIMONY ASSIGNMENT AND SUMMARY**

2 **Q. What is your assignment in this proceeding?**

3 A. The purpose of my testimony is to describe and support the reasonableness of
4 SPS's RCEs incurred in preparing, prosecuting, and settling Docket No. 50804,
5 its 2020 Energy Efficiency Cost Recovery Factor ("EECRF") application.
6 Specifically, my testimony:

- 7 • describes the nature and scope of SPS's filing in Docket No. 50804;
- 8 • describes the basis for the RCEs addressed in this docket; and
- 9 • supports the reasonableness of the RCEs being reviewed.

10 **Q. Please describe your experience as it relates to the review and recovery of**
11 **RCEs.**

12 A. In my former position as Case Specialist and now as Manager – Rate Cases, I
13 have had frequent contact with the persons primarily responsible for reviewing
14 the reasonableness and necessity of the invoices submitted to SPS in association
15 with ratemaking proceedings before the Commission including, base-rate cases,
16 fuel reconciliations, EECRF filings, and RCE recovery dockets. Through these
17 roles, I have also gained familiarity with the prevailing hourly rates associated
18 with individuals and the firms that provide legal services in connection with
19 regulatory proceedings before the Commission. I am also familiar with the range
20 of services provided by outside attorneys in connection with such cases, as well as
21 the amount of time and effort expended in performing such engagements.

1 **Q. What amount of RCEs was incurred by SPS in Docket No. 50804?**

2 A. SPS incurred a total of \$22,979.67 in RCEs in Docket No. 50804, as shown in
3 Attachment JWC-2, page 1. Of that total, \$22,856.07 was for outside legal
4 expenses and consultant fees. The remaining \$123.60 in RCEs was for postage
5 costs and internal processing service fees associated with the filing and case
6 management of Docket No. 50804.

7 **Q. Did SPS make any adjustments to the RCEs?**

8 A. No.

9 **Q. How are you presenting your testimony on this topic?**

10 A. Subsection (c) of 16 Tex. Admin. Code (“TAC”) § 25.245 (“Rule 25.245”) sets
11 forth criteria for the review and determination of the reasonableness of RCEs. My
12 testimony provides a good-faith attempt to address the criteria as applied to SPS’s
13 EECRF-related RCEs incurred in Docket No. 50804.

14 **Q. Does your testimony demonstrate the reasonableness of SPS’s EECRF RCEs
15 under Rule 25.245?**

16 A. Yes, as I discuss further below.

17 **Q. How are the RCEs presented in Attachment JWC-2?**

18 A. Attachment JWC-2, page 1 provides a summary of the RCEs incurred in Docket
19 No. 50804 and requested by SPS in this proceeding. The summary provided on
20 page 1 breaks down the RCEs between outside legal costs and internal employee
21 costs by month. Attachment JWC-3 provides an allocation of requested RCEs to
22 the phases in Docket No. 50804.

1 **Q. You state that Attachment JWC-3 presents SPS's requested RCEs by phase.**
2 **Please explain how this allocation was performed.**

3 A. First, with Docket No. 50804 being settled with no discernable issues, in order to
4 comply with Rule 24.245(b)(6), SPS has allocated the RCEs to phases rather than
5 to issues. For Docket No. 50804, those phases are the policy, program, and cost
6 allocation and rate design phases. Second, the expenses were divided into three
7 groups. The first group is expenses that could be directly assigned to a phase.
8 Those expenses are presented in Attachment JWC-3, lines 1-6.

9 The second group includes expenses that relate to or are intertwined with
10 all three phases and, thus, are not capable of being directly allocated to a specific
11 phase. These amounts include work on testimony, discovery, and settlement
12 activities. There is no practical way to assign these expenses to a single phase.
13 For example, with respect to discovery, it would be impractical, for an attorney
14 reviewing a set of discovery questions that covers topics spanning multiple phases
15 to spend time recording 0.1 hour increments to particular phases for reviewing
16 every single question. Consequently, an allocation factor was developed for each
17 of these expense categories. These expenses are presented in Attachment JWC-3,
18 lines 7-13.

19 Finally, there were some costs that could not be directly assigned or
20 allocated to a particular phase. These expenses are related to general matters,
21 such as preparing the EECRF application, pre-filing meetings, procedural matters,
22 and the settlement work. For these costs, an allocator was developed based on the

1 allocation of the directly assigned and allocated costs by phase to the total costs.

2 These expenses are presented in Attachment JWC-3, lines 14-20.

3 **Q. Are you the only SPS witness testifying in this proceeding?**

4 A. No. SPS is presenting the testimony of three other witnesses to address policy,
5 program, and cost allocation – rate design matters in this docket.

6 **Q. Do you have any attachments to your testimony?**

7 A. Yes. Attachments JWC-1 through JWC-4(CD) are included along with this
8 testimony.

9 **Q. Are Attachments JWC-1 through JWC-4(CD) true and correct copies of the**
10 **documents you represent them to be or prepared by you or under your**
11 **supervision, as applicable?**

12 A. Yes.

1 **III. Background of SPS’s 2020 EECRF Filing in Docket No. 50804**

2 **Q. When did SPS make its EECRF filing in Docket No. 50804?**

3 A. SPS filed its application to adjust its EECRF on May 1, 2020. In conformity with
4 16 TAC § 25.182(d)(10), SPS’s filing included testimony and schedules, in Excel
5 format with formulas intact, as well as the required categories of information
6 under 16 TAC § 25.181, as applicable. In addition to its EECRF application, SPS
7 submitted the Direct Testimonies of Mr. Jeremy M Lovelady, Mr. Bryan Whitson,
8 Mr. Richard M. Luth, and my testimony in support of rate case expenses.

9 **Q. What relief did SPS request in that application?**

10 A. SPS sought similar relief as it seeks in this current application for Program Year
11 (“PY”) 2022, but for PY 2021. In particular, SPS sought findings from the
12 Commission that were for PY 2021:

- 13 (1) the programs proposed by SPS were cost-effective;
14
15 (2) the affiliate costs were reasonable as set forth under PURA¹
16 § 36.058;
17
18 (3) the Research and Development (“R&D”) expenses were
19 lower than the caps set forth in 16 TAC § 25.181(g);
20
21 (4) the incentives forecasted to be paid were lower than the cap
22 in 16 TAC § 25.181(f);
23
24 (5) as a result of the plan, SPS would be expected to achieve the
25 required demand and energy savings reductions;
- 26 (6) the RCEs incurred by SPS in its 2020 EECRF proceeding
27 (Docket No. 50804) were reasonable and necessary; and

¹ Public Utility Regulatory Act, Tex. Util. Code §§ 11.001–66.016 (“PURA”).

1 (7) an EECRF rider could be implemented to recover the
2 program and administrative costs.

3

4 **Q. Did any parties intervene in Docket No. 50804?**

5 A. Yes, Texas Industrial Energy Consumers (“TIEC”) intervened. Commission Staff
6 (“Staff”) also participated in Docket No. 50804.

1 **A. Novelty and Complexity of the Issues Addressed**

2 **Q. Did Docket No. 50804 present any new or complex issues, compared to prior**
3 **SPS EECRF proceedings?**

4 A. No. All issues presented in Docket No. 50804 had been addressed in prior SPS
5 EECRF proceedings or were routine requests for relief that had been approved in
6 previous SPS EECRF proceedings.

7 **Q. In Docket No. 50804, were issues raised that ultimately required rebuttal**
8 **testimony and litigation?**

9 A. No. The parties were able to resolve the proceeding through an unopposed
10 stipulation.

11 **B. Discovery**

12 **Q. Did SPS receive discovery from any party in Docket No. 50804?**

13 A. Yes. SPS received one set of discovery from Staff.

14 **C. Unopposed Stipulation**

15 **Q. How did the parties reach an unopposed stipulation?**

16 A. Based on discovery responses and informal discussions, SPS, Staff, and TIEC
17 resolved all issues relating to Docket No. 50804. Accordingly, SPS drafted an
18 unopposed stipulation and circulated it to Staff and TIEC for their review,
19 comments, and edits. SPS also filed an agreed joint motion to amend the
20 procedural schedule to allow for the stipulation to be further considered and
21 finalized.

22 **Q. Did either party oppose the stipulation?**

23 A. No. Staff joined the stipulation and TIEC was unopposed.

1 **Q. When was the unopposed stipulation filed?**

2 A. On August 5, 2020.

3 **Q. When did the Commission issue a final order in Docket No. 50804?**

4 A. The Commission issued a final order adopting the unopposed stipulation on
5 September 24, 2020.

1 **D. Breakdown of RCEs Incurred in Docket No. 50804**

2 **Q. Is SPS seeking to recover all of its RCEs associated with Docket No. 50804 in**
3 **this proceeding?**

4 A. Yes. As discussed below, the \$22,980 of RCEs incurred by SPS in Docket No.
5 50804 were reasonable and necessary and, therefore, should be recovered.

6 **Q. What types of RCEs did SPS incur for Docket No. 50804?**

7 A. As I detailed above, of the \$22,980 of RCEs incurred by SPS in Docket
8 No. 50804, \$22,856 was for outside legal counsel and expert consultant expenses.
9 SPS also incurred \$124, in postage costs and internal processing service fees
10 associated with filing and settlement of Docket No. 50804.

11 **Q. In addition to the \$22,980 of RCEs incurred by SPS in Docket No. 50804, did**
12 **SPS incur any expenses from municipalities?**

13 A. No.

14 **1. Outside Legal Counsel and Consultant RCEs**

15 **Q. What attorneys did SPS retain to assist with Docket No. 50804?**

16 A. SPS retained Duggins, Wren, Mann, & Romero, LLP (“DWMR”) to assist with
17 the preparation and prosecution of Docket No. 50804. DWMR has extensive
18 experience in Texas regulatory matters generally. Specifically, DWMR attorneys
19 Mr. Patrick Pearsall and Ms. Stephanie Green performed and billed for legal
20 services. Mr. Pearsall has represented SPS in its last five EECRF proceedings,
21 Docket Nos. 45916, 47117, 48324, 49495 and 50804.

1 **Q. What types of work did the DWMR attorneys perform on behalf of SPS in**
2 **Docket No. 50804?**

3 A. The DWMR attorneys' work during Docket No. 50804 was at the direction of Mr.
4 Mark Walker, who was lead in-house XES attorney in Docket No. 50804, and in
5 coordination with internal XES personnel. In particular, the DWMR attorneys
6 performed a variety of tasks during the preparation and prosecution of Docket No.
7 50804, including:

- 8 • assisting SPS with the preparation of the annual Energy Efficiency Plan
9 and Report ("EEPR");
- 10 • drafting the application;
- 11 • assisting witnesses with the preparation of their direct testimonies,
12 attachments, and workpapers;
- 13 • assisting SPS regulatory staff with the preparation of RCE supporting
14 materials;
- 15 • assisting witnesses and SPS regulatory staff in preparing discovery
16 responses; and
- 17 • participating in settlement negotiations and drafting the resulting
18 stipulation and proposed order.

19 **Q. Did SPS agree to pay the DWMR attorneys' hourly rates for the work they**
20 **did on the case?**

21 A. Yes. DWMR's hourly fees were negotiated based upon the scope of the
22 engagement and the customary fees for regulatory attorneys retained by SPS.

23 **Q. Was it reasonable and necessary for SPS to retain DWMR to represent it in**
24 **Docket No. 50804?**

25 A. Yes. While Mr. Walker was the lead attorney for SPS and provided substantial
26 assistance, he was also responsible for a number of other legal and regulatory

1 matters regarding SPS's operations in both Texas and New Mexico, including
2 base rate cases prosecuted in both states during the preparation and prosecution of
3 this case. Given these other responsibilities and work load, Mr. Walker would not
4 have been able to adequately prepare and prosecute Docket No. 50804 without
5 assistance from outside counsel.

6 **Q. Did SPS retain any outside consultants to provide testimony in Docket**
7 **No. 50804?**

8 A. No. All of the witnesses were either SPS or XES employees.

9 **Q. Did SPS or its outside attorneys retain any non-testifying consultants to assist**
10 **with preparation of the RCEs or testimony and to assist with the prosecution**
11 **of the case?**

12 A. No.

13 2. Other Expenses

14 **Q. In addition to outside legal and consultant costs, were other costs incurred**
15 **for Docket No. 50804?**

16 A. Yes. SPS incurred \$15.98 in postage costs. These expenses are presented in
17 Attachment JWC-2, page 1, line 26. The bulk of the costs are related to signing
18 notarized affidavits during the pandemic work from home circumstance. In
19 addition, SPS incurred \$107.62 in internal processing service fees. These
20 expenses are presented in Attachment JWC-2, page 1, line 24.

1 **Q. What is an internal processing service fee?**

2 A. Internal processing service fees reflect the costs associated with processing
3 invoices for outside services, including consultants and legal services. These fees
4 are associated with invoices that are paid through the supply-chain department.

5 **Q. Are the internal processing fees requested in this docket related only to SPS's**
6 **2020 EECRF?**

7 A. Yes. Expenses related to prosecuting SPS's EECRF are booked to a unique
8 internal order (similar to a sub-ledger). The internal processing fees are only
9 applied for those invoices booked to the unique internal order meaning that the
10 internal processing fees are unique to SPS's 2020 EECRF.

11 **Q. Are internal processing service fees necessary EECRF-related expenses?**

12 A. Yes. As I stated above, while Mr. Walker was the lead attorney for SPS in
13 Docket No. 50804, and provided substantial assistance, he was also responsible
14 for a number of other legal and regulatory matters regarding SPS's operations in
15 both Texas and New Mexico. Given these other responsibilities and work load,
16 Mr. Walker would not have been able to adequately prepare and prosecute Docket
17 No. 50804 without assistance from outside counsel. The internal processing fees
18 incurred for Docket No. 50804 were simply small charges related to processing
19 the invoices for these necessary outside services and therefore should be
20 considered reasonable.

1 **IV. REVIEW OF RCEs INCURRED IN DOCKET NO. 50804**

2 **Q. What do you discuss in this section of your testimony?**

3 A. As stated earlier in my testimony, SPS has not made any adjustments to the RCEs
4 for which it is seeking recovery in this case. In this section of my testimony, I
5 discuss the review process I utilized to determine that adjustments were
6 unnecessary and the supporting documents I provide in my Workpapers, which
7 are attached to this testimony as Attachment JWC-4(CD).

8 **Q. What process did SPS use to review the Docket No. 50804 RCEs before**
9 **requesting recovery?**

10 A. First, a separate Internal Order (similar to a subledger) is maintained for work on
11 SPS's EECRF proceedings. Within that specified Internal Order, the RCEs
12 booked are coded so as to be discernable as RCEs. Furthermore, no costs booked
13 to that specified Internal Order are recovered outside of the EECRF.

14 Next, SPS reviewed each expense identified as a RCE from the Internal
15 Order based on the entry and the receipt/invoice to determine if it was
16 appropriately charged to the Internal Order and if it was a recoverable expense.

17 Next, the expenses were grouped according to the month they were
18 booked, and were detailed on a spreadsheet, provided as a workpaper to
19 Attachment JWC-2, which identifies the reason for the expense, the amount of the
20 expense, and the individual that incurred the expense. Finally, SPS personnel
21 grouped all receipts and invoices by month, then by category of expense, and
22 finally by who incurred the expense. These receipts and invoices are also included

1 as part of my Workpapers, which are provided as Attachment JWC-4(CD) to this
2 testimony.

3 **Q. During the review process, did SPS identify any expenses that should be**
4 **adjusted out of the requested recovery?**

5 A. No. SPS did not incur any costs for meals, alcohol, travel, or hotels which are the
6 normal instances where some expenses cannot be recovered. SPS's only expenses
7 outside of legal and consultant costs were the noted \$124 of postage expenses and
8 internal processing fees. Furthermore, I have reviewed SPS's outside legal costs
9 and no attorney worked in excess of 12 hours per day. I have provided a schedule
10 of attorney hours worked as part of my Workpapers.

11 **Q. Can you attest to the reasonableness and necessity of the incurrence of each**
12 **and every RCE that SPS incurred for this docket?**

13 A. Yes. I have reviewed each and every RCE item that SPS incurred for this docket
14 and the incurrence of each and every one of those expenses was reasonable and
15 necessary.

1 V. REASONABLENESS OF SPS'S 2020 EECRF RCES

2 **Q. Has SPS provided sufficient information and documentation that details all**
3 **of its requested RCES?**

4 A. Yes. As described above, I have attached the invoices, expense account
5 information, and other supporting documentation to support the necessity and
6 reasonableness of the RCES incurred by SPS in Docket No. 50804. In sum, SPS
7 has provided adequate documentation, in the same form and level as that provided
8 by SPS in past EECRF proceedings and other RCE recovery dockets.

9 **Q. Were the tasks performed by, or time spent on a task by the DWMR**
10 **attorneys extreme or excessive?**

11 A. No. Based on my experience, the types and amount of work performed by the
12 DWMR attorneys was consistent with that performed in past cases and was
13 reasonable and justified given the nature of the EECRF proceeding.

14 **Q. Were the hourly fees charged by and paid to DWMR extreme or excessive?**

15 A. No. In my opinion, the DWMR attorneys' hourly rates are reasonable. Based on
16 my experience and review of the underlying documentation, the hourly rates
17 charged are: (1) commensurate with the DWMR attorneys' experience and the
18 types of cases upon which each professional has worked; and (2) consistent with
19 prevailing hourly rates for utility lawyers practicing before the Commission.

1 **Q. Was the DWMR attorneys' work duplicative of the work Mr. Walker**
2 **performed?**

3 A. No. SPS manages the work of its outside counsel to avoid duplication of effort.
4 For example, specific witnesses were assigned to specific attorneys and outside
5 attorneys generally provided legal assistance for issues specific to their assigned
6 witnesses. As a result, duplication of work was generally avoided through the
7 initial assignment of specific witnesses to specific attorneys.

8 Further, drafting of the unopposed stipulation, proposed order, and
9 associated motions was performed by Mr. Pearsall, with Mr. Walker reviewing,
10 editing, and providing input for finalization purposes.

11 **Q. Are the requested RCEs as a whole disproportionate, excessive, or**
12 **unwarranted in relation to the nature and scope of Docket No. 50804?**

13 A. No. The requested RCEs do not appear to me to be disproportionate, excessive,
14 or unwarranted for an EECRF proceeding based upon my experience in similar
15 matters before the Commission.

16 **Q. Did SPS propose anything in Docket No. 50804 that had no basis in law,**
17 **policy, or fact and was not warranted by any reasonable argument for the**
18 **extension, modification, or reversal of Commission precedent?**

19 A. No. As noted above, SPS raised no new or unprecedented issues in Docket No.
20 50804.

1 **Q. Are the RCEs that SPS is seeking recovery of for its 2020 EECRF proceeding**
2 **reasonable and necessary?**

3 A. Yes. I have considered the factors included in 16 TAC § 25.245 in reviewing the
4 RCEs that SPS incurred in its 2020 EECRF proceeding. Based on my training
5 and experience in regulatory matters as well as litigating SPS's prior EECRF
6 cases, I conclude that the RCEs incurred in SPS's 2020 EECRF proceeding are
7 reasonable and necessary considering the complexity of the case, the number of
8 issues addressed, the amount of money involved, the responsibilities assigned to
9 outside lawyers and consultants, and the benefits derived by SPS from the
10 participation of these individuals.

11 **Q. Does this conclude your pre-filed direct testimony?**

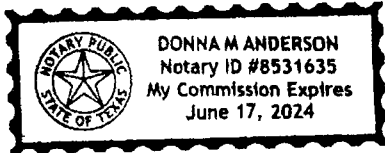
12 A. Yes.


AFFIDAVIT

STATE OF TEXAS)
)
COUNTY OF POTTER)

JEREMIAH W. CUNNINGHAM, first being sworn on his oath, states:

I am the witness identified in the preceding prepared direct testimony. I have read the testimony and the accompanying attachments and am familiar with their contents. Based upon my personal knowledge, the facts stated in the testimony are true. In addition, in my judgment and based upon my professional experience, the opinions and conclusions stated in the testimony are true, valid, and accurate.





JEREMIAH W. CUNNINGHAM

Subscribed and sworn to before me this 23 day of Apr 2021 by
JEREMIAH W. CUNNINGHAM.



Notary Public, State of Texas

My Commission Expires: 6/17/24

CERTIFICATE OF SERVICE

I certify that on April 30th , 2021, this instrument was filed with the Public Utility Commission of Texas, and a true and correct copy of it was served on the Staff of the Public Utility Commission of Texas by hand delivery, Federal Express, regular first class mail, certified mail, or facsimile transmission.

/s/ J. Rich Sparks

Southwestern Public Service Company

List of Prior Testimonies

Regulatory Commission	Docket/Case Number	Description of Proceeding	Year	Party on Whose Behalf Testimony was Submitted
PUCT	46328	<i>Review of Rate Case Expenses Incurred by Southwestern Public Service Company and Municipalities in Docket No. 45524</i>	2017	SPS
PUCT	47588	<i>Review of Rate-Case Expenses Incurred by Southwestern Public Service Company in Docket No. 47527</i>	2019	SPS
PUCT	49690	<i>Application of Southwestern Public Service Company for Authority to Implement a Net Refund for Over-Collected Fuel Costs</i>	2019	SPS
PUCT	50556	<i>Application of Southwestern Public Service Company for Authority to Implement A Net Refund for Over-Collected Fuel Costs</i>	2020	SPS
PUCT	50804	<i>Application of Southwestern Public Service Company to Adjust Its Energy Efficiency Cost Recovery Factor</i>	2020	SPS
PUCT	51644	<i>Application of Southwestern Public Service Company for Authority to Implement a Net Surcharge Associated with Docket No. 49831</i>	2020	SPS
PUCT	51625	<i>Application of Southwestern Public Service Company for Authority to Revise its Fuel Factor Formula and Related Relief</i>	2020	SPS
PUCT	51665	<i>Application of Southwestern Public Service Company to Change its Fuel Factor and Related Relief</i>	2020	SPS

Southwestern Public Service Company

Summary of Rate Case Expenses
Incurred in Docket No. 50804

Line No.									Expenses
		May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	To Date
1	Legal Counsel								
2	Duggins Wren								
3	Regulatory Counsel								
4	Professional Fees	\$ -	\$ 12,617.00	\$ 1,401.00	\$ 4,566.00	\$ 824.50	\$ 3,387.50	\$ -	\$ 22,796.00
5	Adjustments Made to Professional Fees	-	-	-	-	-	-	-	-
6	Expenses	-	30.84	-	29.23	-	-	-	60.07
7	Adjustments Made to Expenses	-	-	-	-	-	-	-	-
8	Total Charges	\$ -	\$ 12,647.84	\$ 1,401.00	\$ 4,595.23	\$ 824.50	\$ 3,387.50	\$ -	\$ 22,856.07
9	Total Legal Counsel	\$ -	\$ 12,647.84	\$ 1,401.00	\$ 4,595.23	\$ 824.50	\$ 3,387.50	\$ -	\$ 22,856.07
10	Employee Expenses								
11	Employee and Other Expenses								
12	Airfare	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
13	Airfare - Service Fees	-	-	-	-	-	-	-	-
14	Car Rental	-	-	-	-	-	-	-	-
15	Car Rental - Gas	-	-	-	-	-	-	-	-
16	Car Rental - Service Fee	-	-	-	-	-	-	-	-
17	Equipment Rental	-	-	-	-	-	-	-	-
18	Hotel	-	-	-	-	-	-	-	-
19	Hotel - Service Fee	-	-	-	-	-	-	-	-
20	Internal Processing Fee	-	94.86	(29.36)	26.46	4.69	8.27	2.70	107.62
21	Lodging Tax	-	-	-	-	-	-	-	-
22	Mailings/Freight/Postage	15.98	-	-	-	-	-	-	15.98
23	Materials - Non-Inventory	-	-	-	-	-	-	-	-
24	Meals	-	-	-	-	-	-	-	-
25	Notice	-	-	-	-	-	-	-	-
26	Office Supplies	-	-	-	-	-	-	-	-
27	Outside Vendor - Contract Employees	-	-	-	-	-	-	-	-
28	Other	-	-	-	-	-	-	-	-
29	Parking	-	-	-	-	-	-	-	-
30	Personal Car Mileage	-	-	-	-	-	-	-	-
31	Printing (Sir Speedy)	-	-	-	-	-	-	-	-
32	Service Fees	-	-	-	-	-	-	-	-
33	Taxi/Bus/Other	-	-	-	-	-	-	-	-
34	Telephone	-	-	-	-	-	-	-	-
35	Temporary Employees	-	-	-	-	-	-	-	-
36	Tip (s)	-	-	-	-	-	-	-	-
37	Adjustments Made to Employee Expenses	-	-	-	-	-	-	-	-
38	Total Miscellaneous Expenses	\$ 15.98	\$ 94.86	\$ (29.36)	\$ 26.46	\$ 4.69	\$ 8.27	\$ 2.70	\$ 123.60
39	TOTAL RATE CASE EXPENSES BOOKED	\$ 15.98	\$ 12,742.70	\$ 1,371.64	\$ 4,621.69	\$ 829.19	\$ 3,395.77	\$ 2.70	\$ 22,979.67
40	TOTAL EXCLUSIONS BY MONTH	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
41	TOTAL RATE CASE EXPENSES REQUESTED	\$ 15.98	\$ 12,742.70	\$ 1,371.64	\$ 4,621.69	\$ 829.19	\$ 3,395.77	\$ 2.70	\$ 22,979.67

Southwestern Public Service Company

Allocation of Requested RCEs Incurred
by SPS in Docket No. 49495 by Phase

Line No.	Description	Total RCEs Requested by SPS	Policy Phase	Program Phase	Cost Allocation & Rate Design Phase	check
1	Amounts Directly Assigned to Phase					
2	Policy Direct Testimony	\$ 777 00	\$ 777 00	\$ -	\$ -	\$ 777 00
3	Program Direct Testimony	1,369 00	-	1,369 00	-	1369
4	Cost Allocation-Rate Design Direct Testimony	1,258 00	-	-	1,258 00	1258
5	Rate Case Expense Direct Testimony	3,145 00	-	-	3,145 00	3145
6	Total Amount Direct Assigned to Phase	\$ 6,549.00	\$ 777.00	\$ 1,369.00	\$ 4,403.00	\$ 6,549 00
7	Amounts Allocated on Testimony Page Counts					
8	Allocated Direct Testimony Costs	\$ 37 00	\$ 13 40	\$ 8 29	\$ 15 31	\$ 37 00
9	Total Allocated Testimony Amounts	\$ 37.00	\$ 13.40	\$ 8.29	\$ 15.31	\$ 37 00
10	Amounts Allocated on Discovery Allocators					
11	Discovery	\$ 777 00	\$ 691 53	\$ 85 47	\$ -	\$ 777 00
12	Total Allocated of Discovery Costs	\$ 777.00	\$ 691.53	\$ 85.47	\$ -	\$ 777 00
13	Sub-Total for Direct Assigned and Directly Allocated Costs	\$ 7,363.00	\$ 1,481.93	\$ 1,462.76	\$ 4,418.31	\$ 7,363 00
14	Procedural Items Allocated on Overall Allocator					
15	Overall Allocator = Phase Cost/Overall Costs		0 201266678	0 198664010	0 600069312	1 000000000
16	Preparation of EECRF Application	\$ 3,552 00	\$ 714 90	\$ 705 65	\$ 2,131 45	\$ 3,552 00
17	Pre-Filing Meetings and Filing of Application	274 98	\$ 55 34	\$ 54 63	\$ 165 01	274 98
18	Procedural Matters	9,178 19	\$ 1,847 26	\$ 1,823 38	\$ 5,507 55	\$ 9,178 19
19	Settlement	2,611 50	\$ 525 61	\$ 518 81	\$ 1,567 08	2611 5
20	Total Allocated Procedural Item Costs	\$ 15,616.67	\$ 3,143.12	\$ 3,102.47	\$ 9,371.08	\$ 15,616 67
21	Total Costs by Phase	\$ 22,979.67	\$ 4,625.04	\$ 4,565.23	\$ 13,789.39	\$ 22,979 67

Southwestern Public Service Company

Workpapers of Jeremiah W. Cunningham

PUCT DOCKET NO. _____

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

Attachment JWC-4(CD)