

**NOVEMBER 2019
DELIVERY RECAP**

Account #	Cost
■	■
■	■
785	\$36.00
■	■

Anything, Anytime Anywhere



Magic Couriers, Inc.
(512) 248-8686

Bill to:
Herrera Law Firm
4400 Medical Parkway
Austin, Texas 78705

Invoice for billing period 10-31-19 through 11-13-19

Invoice #: 111319

Date/Time	Service	Address	Reference	Cost
11-1 / 2:00pm	RT / ASAP	PUC	785	\$ 36.00
Total				\$

Please remit payments to: ***Magic Couriers, Inc.***
815-A Brazos
276
Austin, TX. 78701

WESTLAW Research

NOVEMBER 2019

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
■	■	X \$65.00		■
■	■	X \$65.00		■
■	■	X \$65.00		■
■	■	X \$65.00		■
785	.63	X \$65.00		\$40.95
■	■	X \$65.00		■

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701

Date: 12-3-19
Tax ID #: 26-2374359
Invoice#:SPSRate NOV19

Re: SPS Base Rate Case Analysis - PUC Docket No. 49831

1785

Statement for professional services rendered 11-1-19 through 11-30-19

<u>Date</u>	<u>Code/Description (see page 2 for code descriptions)</u>	<u>Hours</u>
11-01-19	D, 2 - Reviewed support for capital additions	5.0 hrs
11-07-19	B, D, 3 - Reviewed RFI responses on capital additions and O&M expenses	4.5 hrs
11-11-19	B, D, 2, 4 - Reviewed RFI responses and testimony; analyzed Tolk operating plan issues	6.0 hrs
11-12-19	D, 3, 4 - Reviewed RFI responses and testimony on Hale Project and Tolk operations	5.5 hrs
11-18-19	D, 2, 5 - Reviewed RFI responses and schedules addressing purchased power and generation costs	<u>3.0 hrs</u>
Total hours:		24.0 hrs

Total due: 24.0 hours at \$220 per hour = \$5,280

Thank you for the opportunity to assist with this project.

Substantive Issue Codes

- 1 General overview of rate-filing package/testimonies
- 2 Generation, Transmission and Distribution
- 3 Hale Wind Facility
- 4 Tolk Plant
- 5 Purchased Power
- 6 Accounting and Taxes
- 7 Depreciation
- 8 Cost of Capital
- 9 Vegetaion Management
- 10 Affiliate Expenses
- 11 Wholesale Sales
- 12 SPP Issues
- 13 Off-System Sales
- 14 Rate Case Expenses
- 15 Cost Allocation/Rate Design

Phase of Case Codes

- A Initial Review of Application and Schedules
- B Discovery
- C Procedural Issues
- D Research/Collation of Analysis
- E Preparation of Testimony
- F Settlement
- G Hearing on the Merits
- H Exceptions and Reply to Exceptions
- J Motions and Reply to Motions for Rehearing
- K Appeals of PUCT Final Order

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
12/4/2019	4507

BILL TO

Herrera Law & Associates, PLLC
Alfred Herrera
4400 Medical Parkway
Austin, Texas 78701

PROJECT

HL SPS 19 RC 49831

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	8.3	270.00	2,241.00
Work Completed thru - November 30, 2019		TOTAL DUE	\$2,241.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
November 7, 2019	B15 Review responses to discovery.	0.80
November 13, 2019	B1 Review confidential discovery response index.	0.30
November 14, 2019	B15 Review responses to discovery.	0.60
November 15, 2019	B1 Review discovery.	0.40
November 18, 2019	D15 Work on analysis.	2.20
November 19, 2019	D15 Work on analysis.	2.40
November 21, 2019	B15 Review responses to discovery.	0.60
November 25, 2019	B15 Download and review responses to discovery.	1.00

8.30

GARRETT GROUP CONSULTING, INC.
4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013

TELEPHONE (405) 239-2226 E-MAIL MGARRETT@GARRETTGROUPLLC.COM

December 4, 2019

Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701

785

RE: SPS 2019 Rate Case, PUC Docket No. 49831

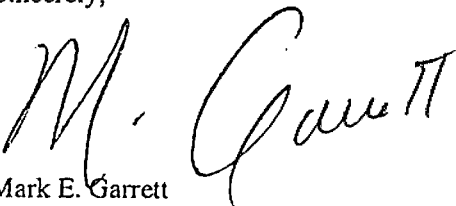
Dear Freddy:

Our invoice for professional services in November of 2019 in connection with the above-referenced case follows:

I. Professional Services:		
A.	M. E. Garrett – 34 hours at \$250.00 per hour (Details in Attachment A)	\$8,500.00
B.	Ed Farrar – 11 hours at \$150.00 per hour (Details in Attachment B)	\$1,650.00
C.	Garry Garrett – 8 hours at \$125.00 per hour (Details in Attachment C)	\$1,000.00
II. Expenses:		
	Office Expenses	<u>N/C</u>
III. Total This Invoice:		\$11,150.00

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,


Mark E. Garrett
Attachments

MEG/gg

Attachment A

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Mark Garrett)

November 2019 – 34 Hours

Date	Task	Hours
November		
5	Review application, testimony and exhibits. Review workpapers.	4
7	Review application, testimony and exhibits. Review workpapers.	6
12	Review and develop discovery. Work with other consultants on the case. Develop issues.	6
14	Review application, testimony and exhibits. Review workpapers.	4
23	Review and develop discovery. Work with other consultants on the case. Develop issues.	6
26	Review and develop discovery. Develop issues.	4
28	Review and develop discovery. Develop issues.	4
Total		34

Attachment B

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Edwin Farrar)

November 2019 – 11 Hours

Date	Task	Hours
November		
22	Review SPS exhibits and discovery responses, draft exhibit	3
23	Review discovery responses	1
24	Review discovery responses, draft discovery	3
25	Review testimony, exhibits, and discovery, draft adjustments	4
Total		11

Attachment C

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Garry Garrett)

November 2019 – 8 Hours

Date	Task	Hours
November		
23	Develop issues	2
25	Develop issues, develop discovery	4
27	Develop issues	2
Total		8



January 13, 2020

Alliance of Xcel Municipalities
c/o Bryan McWilliams, City Attorney
City of Amarillo
601 S. Buchanan, Ste. 207
Amarillo, TX 79101

**Re: PUC Docket No. 49831: *Application of Southwestern Public Service Company for Authority to Change Rates*
Account # 785**

Dear Mr. McWilliams :

Enclosed is our invoice for services provided to the Alliance of Xcel Municipalities regarding the above referenced account through the month of December, 2019.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred R. Herrera', written over a horizontal line.

Alfred R. Herrera

ARH:ll
Enclosure

**PUC Docket No. 49831
SOAH Docket No. 473-19-6677
Application of Southwestern Public Service Company
for Authority to Change Rates**

Expense Summary Sheet
Through December 2019

	<u>Previous Total</u>	<u>December</u>	<u>Cumulative Total</u>
Herrera Law & Associates, PLLC			
Attorney Fees	\$108,506.50	\$14,939.50	\$123,446.00
Expenses:			
Copy Expense	\$129.70	\$345.00	\$474.70
Outside Copies			
Postage Expense	\$2.15		\$2.15
FedEx Expense			
Fax Expense	\$117.50		\$117.50
Conference Call			
Delivery Expense	\$184.00	\$103.00	\$287.00
Research	\$338.00	\$99.45	\$437.45
Travel-Airfare			
Travel Car/Gas/Parking	\$12.00		\$12.00
Travel – Mileage			
Travel – Hotel			
.			
Norwood Energy,	\$20,350.00	\$6,160.00	\$26,510.00
Resolve Utility Consulting	\$7,800.00		\$7,800.00
ReSolved Energy Consulting	\$21,105.00	\$3,780.00	\$24,885.00
Garrett Group Consulting, Inc.	\$29,800.00		\$29,800.00
Total	\$188,344.85	\$25,426.95	\$213,771.80
Amount received			<u>(\$126,180.20)</u>
Balance			\$87,591.60

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

January 13, 2020

Invoice submitted to:

Alliance of Xcel Municipalities
c/o Bryan McWilliams, City
Attorney
City of Amarillo
601 S. Buchanan, Ste. 207
Amarillo, TX 79101

In Reference To:

Application of Southwestern Public
Service Company for Authority to
Change Rates
PUC Docket No. 49831
Acct #785

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
12/02/19	Leslie Lindsey - Assemble RCE documents for Affidavit	1.30 140.00/hr	182.00
	Leslie Lindsey - Reviewed and updated case file; distributed RFI responses to attorneys and consultants	0.20 140.00/hr	28.00
	Brennan Foley - Prepare response to Staff RFIs re: RCEs	0.30 325.00/hr	97.50
	Brennan Foley - Review SPS's appeal of SOAH Order No. 5 and motion to compel	0.40 325.00/hr	130.00

Alliance of Xcel Municipalities

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
12/02/19	Brennan Foley - Research incentive compensation issue	0.60 325.00/hr	195.00
	Brennan Foley - Review RFI responses re: transmission issues	0.50 325.00/hr	162.50
12/03/19	Brennan Foley - Review SPS's response to Orion's motion to compel	0.20 325.00/hr	65.00
12/04/19	Brennan Foley - Review SPS supplemental RFI responses re: generation	0.10 325.00/hr	32.50
12/05/19	Leslie Lindsey - Reviewed and updated case file; Downloaded Conf & HS Discovery responses, distributed to attorneys & consultants	2.00 140.00/hr	280.00
	Brennan Foley - Research payroll issue and prepare RFIs re: payroll	1.50 325.00/hr	487.50
	Brennan Foley - Correspond with consultants re: case status	0.30 325.00/hr	97.50
	Brennan Foley - Review application, direct testimony and supporting schedules re: generation	1.00 325.00/hr	325.00
	Brennan Foley - Review Staff RFIs re: SPP issues	0.10 325.00/hr	32.50
	Brennan Foley - Review SPS's RFI responses re: RCEs	0.40 325.00/hr	130.00
12/06/19	Leslie Lindsey - Reviewed and updated case file; Downloaded Conf & HS Discovery responses, distributed to attorneys & consultants	1.00 140.00/hr	140.00
	Alfred R. Herrera - Review and revise AXM RFIs to SPS (10th set)	0.70 475.00/hr	332.50

Alliance of Xcel Municipalities

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
12/06/19	Alfred R. Herrera - Review market reports re: financial standing of SPS/Xcel	1.80 475.00/hr	855.00
	Sergio E. Herrera - Clarified discovery response deadline dispute with SPS	0.70 250.00/hr	175.00
12/08/19	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.90 140.00/hr	266.00
12/09/19	Leslie Lindsey - Compile invoices in DN. 49831, 49616, 48973, 48886, 48847, 48498, and 47857 for supplemental filing on Staff 1st RFI to AXM	1.00 140.00/hr	140.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.10 140.00/hr	14.00
	Brennan Foley - Prepare AXM's response to Staff RFIs re: RCEs	0.50 325.00/hr	162.50
	Brennan Foley - Review TIEC's response to SPS's appeal of SOAH Order No. 5	0.20 325.00/hr	65.00
	Brennan Foley - Review SOAH Order No. 6 re: SPS's appeal of order denying motion to compel	0.10 325.00/hr	32.50
	Brennan Foley - Review OPUC RFIs	0.30 325.00/hr	97.50
	Brennan Foley - Review TIEC's response to SPS motion to compel	0.20 325.00/hr	65.00
	Brennan Foley - Review SPS RFI responses re: payroll	0.20 325.00/hr	65.00
12/10/19	Leslie Lindsey - Continue to compile invoices DN. 49831, 49616, 48973, 48886, 48847, 48498, and 47857 for second supplemental filing on Staff 1st RFI to AXM	3.10 140.00/hr	434.00

Alliance of Xcel Municipalities

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/10/19	Leslie Lindsey - Reviewed and updated case file; distributed RFI responses to attorneys and consultants	0.30 140.00/hr	42.00
	Brennan Foley - Draft RFIs re :affiliates expenses	1.30 325.00/hr	422.50
	Brennan Foley - Prepare response to Staff RFIs re: RCEs	1.90 325.00/hr	617.50
12/11/19	Leslie Lindsey - Reviewed and updated case file; distributed RFI responses to attorneys and consultants	0.20 140.00/hr	28.00
	Alfred R. Herrera - Review 10k/10qs re: use of funding	2.10 475.00/hr	997.50
	Alfred R. Herrera - Review discovery dispute and appeal re: SPS/TIEC discovery in preparation for open meeting re: same	0.80 475.00/hr	380.00
	Brennan Foley - Assess SPS's testimony and schedules re: affiliates expense	1.50 325.00/hr	487.50
12/12/19	Leslie Lindsey - Prepare, format, AXM's 11th Set of RFIs to SPS	0.80 140.00/hr	112.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.40 140.00/hr	56.00
	Brennan Foley - Prepare RFIs to SPS re: depreciation and consult with D. Garrett re: same	0.50 325.00/hr	162.50
	Brennan Foley - Prepare responses to Staff RFIs re: RCEs	0.40 325.00/hr	130.00
	Sergio E. Herrera - Communications with SPS re: discovery clarification re: AXM RFI Set No. 10	0.30 250.00/hr	75.00

Alliance of Xcel Municipalities

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/13/19	Leslie Lindsey - Format, prepare, file and serve on all parties AXM's Responses to Staff's 2nd Set of RFIs to AXM and AXM's Second Supplemental Responses to Staff's 1st Set of RFIs to AXM	1.90 140.00/hr	266.00
	Alfred R. Herrera - Attend PUC open meeting re: discovery dispute and appeal re: SPS/TIEC discovery	0.50 475.00/hr	237.50
	Brennan Foley - Prepare responses to Staff RFIs re: RCEs	0.40 325.00/hr	130.00
	Brennan Foley - Review Chairman Walker memorandum re: appeal of order denying SPS's motion to compel	0.10 325.00/hr	32.50
	Brennan Foley - Review response to Staff RFIs re: transmission issues	0.30 325.00/hr	97.50
	Brennan Foley - Research FERC proceedings involving SPP	1.00 325.00/hr	325.00
	Brennan Foley - Review Staff RFIs re: rate design	0.10 325.00/hr	32.50
	Sergio E. Herrera - Attended PUC OM	0.70 250.00/hr	175.00
12/14/19	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	2.00 140.00/hr	280.00
12/16/19	Brennan Foley - Correspond with E. D'Ambrosio re: response to Staff RFIs re: RCEs	0.20 325.00/hr	65.00
	Brennan Foley - Review application, SPS direct testimony and supporting schedules and draft RFIs re: affiliates	1.90 325.00/hr	617.50
	Brennan Foley - Call with C. Webking re: testimony on RCEs	0.50 325.00/hr	162.50

Alliance of Xcel Municipalities

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/16/19	Brennan Foley - Review response to OPUC, Staff and AXM RFIs re: payroll, cost of capital and RCEs	0.50 325.00/hr	162.50
12/17/19	Brennan Foley - Review application, SPS direct testimony and supporting schedules and draft RFIs re: affiliates	1.10 325.00/hr	357.50
12/18/19	Mariann Wood - Prepared AXMs 12th Set of RFIs to SPS, Served upon all parties	0.60 140.00/hr	84.00
	Brennan Foley - Prepare RFIs re: affiliates	0.70 325.00/hr	227.50
	Brennan Foley - Review RFI responses re: depreciation	0.30 325.00/hr	97.50
12/19/19	Mariann Wood - Prepared AXM's 13th Set of RFIs to SPS	0.40 140.00/hr	56.00
	Brennan Foley - Review application, SPS direct testimony and supporting schedules and conduct relevant research and prepare RFIs re:tax issues	3.50 325.00/hr	1,137.50
	Brennan Foley - Review Order re: appeal of SOAH Order No. 5	0.10 325.00/hr	32.50
	Brennan Foley - Review TIEC RFIs re: net salvage	0.10 325.00/hr	32.50
	Brennan Foley - Review SOAH Order No. 7 re: Orion's and SPS's motions to compel	0.20 325.00/hr	65.00
	Sergio E. Herrera - Communications with SPS re: discovery clarification re: AXM RFI Set No. 10	1.00 250.00/hr	250.00
12/20/19	Leslie Lindsey - Prepare, file and serve on all parties AXM's 13th set of RFIs to SPS	0.50 140.00/hr	70.00

Alliance of Xcel Municipalities

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		<u>Hrs/Rate</u>	<u>Amount</u>
12/20/19	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.70 140.00/hr	98.00
	Brennan Foley - Prepare RFIs re: taxes	0.10 325.00/hr	32.50
12/23/19	Brennan Foley - Review Sierra Club RFIs re: Tolk and responses to OPUC RFIs	0.20 325.00/hr	65.00
12/28/19	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	1.00 140.00/hr	140.00
12/29/19	Mariann Wood - Reviewed filings on PUC Interchange and updated case file; Updated discovery spreadsheet	3.50 140.00/hr	490.00
12/30/19	Leslie Lindsey - Compile invoices in DNs. 49831, 49616, 48973, 48886, 48847, 48498, and 47857 for third supplemental filing on Staff 1st RFI to AXM	1.40 140.00/hr	196.00
12/31/19	Brennan Foley - Call with B. Hallmark re: case issues	0.30 325.00/hr	97.50
	Brennan Foley - Conduct research and call D. Garrett re: depreciation	0.70 325.00/hr	227.50
Total Legal Fees:		57.70	\$14,939.50
Expenses :			
12/01/19	Copy expense for the month of December 2019		345.00
	Delivery expense for the month of December 2019		103.00
	Research on Westlaw for the month of December 2019		99.45
	Consultant Invoice - Norwood Energy Consulting, LLC - Inv # SPSRate DEC19		6,160.00

Alliance of Xcel Municipalities

Page 8

		<u>Amount</u>
12/01/19	Consultant Invoice - ReSolved Energy Consulting, LLC - Inv #4531	3,780.00
Total expenses:		\$10,487.45
TOTAL AMOUNT OF THIS BILL:		\$25,426.95
Previous balance		\$152,068.40
12/23/2019	Payment - Thank You. Check No. 427591	(\$89,903.75)
Total payments and adjustments		(\$89,903.75)
BALANCE DUE		\$87,591.60

**Copier Account Totals
DECEMBER 2019**

Account	Printouts	per copy	Total
████	████	X .10	████
████	████	X .10	████
████	████	X .10	████
████	██	X .10	████
785	3450	X .10	\$345.00
████	██	X .10	████
████	██	X .10	████
████	████	X .10	████

**DECEMBER 2019
DELIVERY RECAP**

Account #	Cost
■	■
■	■
■	■
■	■
785	103.00
■	■
■	■



Anything, Anytime Anywhere



Magic Couriers, Inc.
(512) 248-8686

Bill to:
Herrera Law Firm
4400 Medical Parkway
Austin, Texas 78705

Invoice for billing period 12-5-19 through 12-18-19

Invoice #: 121819

Date/Time	Service	Address	Reference	Cost
12-				
12-6 / 12:05pm	RT / 2 hr	PUC	785	\$ 26.00
12-12 / 12:00pm	RT / 2 hr	PUC	/ 785	\$ 26.00 - Split \$13.00
12-13 / 1:05pm	RT / ASAP	PUC	785	\$ 25.00
12-18 / 11:35am	RT / 2 hr	PUC(Brennan)	4983+ 785	\$ 26.00
			Total	\$

Please remit payments to: ***Magic Couriers, Inc.***

815-A Brazos

276

Austin, TX. 78701



Anything, Anytime Anywhere



Magic Couriers, Inc.
(512) 248-8686

Bill to:
Herrera Law Firm
4400 Medical Parkway
Austin, Texas 78705

Invoice for billing period 12-19-19 through 1-1-20

Invoice #: 010120

Date/Time	Service	Address	Reference	Cost
12-20 / 12:10pm 12-21	RT / 2 hr	PUC	785 /	\$ 26.00
Total				\$ --

*Sp 12
13-co*

Please remit payments to: ***Magic Couriers, Inc.***
815-A Brazos
276
Austin, TX. 78701

WESTLAW Research

DECEMBER 2019

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
■	■	X \$65.00		■
■	■	X \$65.00		■
■	■	X \$65.00		■
785	1.53	X \$65.00		\$99.45
■	■	X \$65.00		■

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701

Date: 1-9-20
Tax ID #: 26-2374359
Invoice#:SPSRate DEC19

Re: SPS Base Rate Case Analysis - PUC Docket No. 49831

785

Statement for professional services rendered 12-1-19 through 12-31-19

<u>Date</u>	<u>Code/Description (see page 2 for code descriptions)</u>	<u>Hours</u>
12-04-19	D, 3, 4 - Reviewed Tolk optimization analysis and Hale O&M	6.0 hrs
12-10-19	D, 2, 5 - Reviewed support for capital additions; reviewed purchased power capacity costs	6.5 hrs
12-12-19	D, 2, 4 - Reviewed capital additions and results of Tolk operating plan analyses	4.5 hrs
12-17-19	D, 2, 4 - Reviewed plant outages; reviewed Tolk operational analyses and cooling water constraint issues; reviewed RFIs	7.0 hrs
12-19-19	D, 2, 4 - Reviewed plant retirements and O&M adjustments; reviewed TUCO cost issues; reviewed testimony on Tolk operating constraints and analyses	<u>4.0 hrs</u>

Total hours: 28.0 hrs

Total due: 28.0 hours at \$220 per hour = \$6,160

Thank you for the opportunity to assist with this project.

Substantive Issue Codes

- 1 General overview of rate-filing package/testimonies
- 2 Generation, Transmission and Distribution
- 3 Hale Wind Facility
- 4 Tolk Plant
- 5 Purchased Power
- 6 Accounting and Taxes
- 7 Depreciation
- 8 Cost of Capital
- 9 Vegetaion Management
- 10 Affiliate Expenses
- 11 Wholesale Sales
- 12 SPP Issues
- 13 Off-System Sales
- 14 Rate Case Expenses
- 15 Cost Allocation/Rate Design

Phase of Case Codes

- A Initial Review of Application and Schedules
- B Discovery
- C Procedural Issues
- D Research/Collation of Analysis
- E Preparation of Testimony
- F Settlement
- G Hearing on the Merits
- H Exceptions and Reply to Exceptions
- J Motions and Reply to Motions for Rehearing
- K Appeals of PUCT Final Order

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

EXHIBIT 7
Page 99 of 140

Invoice

DATE	INVOICE NUMBER
1/7/2020	4531

BILL TO

Herrera Law & Associates, PLLC
Alfred Herrera
4400 Medical Parkway
Austin, Texas 78701

785

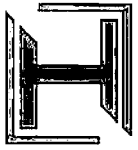
PROJECT
HL SPS 19 RC 49831

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	14	270.00	3,780.00
Work Completed thru - December 31, 2019		TOTAL DUE	\$3,780.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
December 3, 2019	D15. Work on cost allocation issues.	1.20
December 4, 2019	D15. Work on cost allocation issues.	1.30
December 6, 2019	B15. Download and review responses to discovery.	0.40
December 9, 2019	D15. Work on analysis of responses.	2.10
December 10, 2019	D15. Work on analysis of responses.	1.50
December 13, 2019	B15. Review responses to discovery.	0.50
December 17, 2019	D15. Research rate design.	1.20
December 18, 2019	D15. Research rate design.	1.00
December 19, 2019	B15. Review discovery and responses to discovery.	0.80
December 23, 2019	D15. Work on analysis of issues.	1.30
December 27, 2019	B15. Review discovery and responses to discovery.	0.40
December 30, 2019	B15. Download and review responses to discovery.	0.70
December 31, 2019	D15. Work on analysis of responses.	1.60
		14.00



February 5, 2020

Alliance of Xcel Municipalities
c/o Bryan McWilliams, City Attorney
City of Amarillo
601 S. Buchanan, Ste. 207
Amarillo, TX 79101

Re: PUC Docket No. 49831: *Application of Southwestern Public Service Company for Authority to Change Rates*
Account # 785

Dear Mr. McWilliams :

Enclosed is our invoice for services provided to the Alliance of Xcel Municipalities regarding the above referenced account through the month of January, 2020.

Please forward a copy of this invoice to the company.

If I can provide any further explanation about the services provided for you, please call me at (512) 474-1492.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred R. Herrera', written over a horizontal line.

Alfred R. Herrera

ARH:ll
Enclosure

**PUC Docket No. 49831
SOAH Docket No. 473-19-6677
Application of Southwestern Public Service Company
for Authority to Change Rates**

**Expense Summary Sheet
Through January 2020**

	<u>Previous Total</u>	<u>January</u>	<u>Cumulative Total</u>
Herrera Law & Associates, PLLC			
Attorney Fees	\$123,446.00	\$17,929.50	\$141,375.50
Expenses:			
Copy Expense	\$474.70	13.20	\$487.90
Outside Copies			
Postage Expense	\$2.15	2.40	\$4.55
FedEx Expense			
Fax Expense	\$117.50		\$117.50
Conference Call			
Delivery Expense	\$287.00	78.00	\$365.00
Research	\$437.45	46.80	\$484.25
Travel-Airfare			
Travel Car/Gas/Parking	\$12.00		\$12.00
Travel – Mileage			
Travel – Hotel			
Norwood Energy,	\$26,510.00	\$12,100.00	\$38,610.00
Resolve Utility Consulting	\$7,800.00	\$34,700.00	\$42,500.00
ReSolved Energy Consulting	\$24,885.00	\$8,406.00	\$33,291.00
Garrett Group Consulting, Inc.	\$29,800.00	\$40,450.00	\$70,250.00
J. Randall Woolridge		\$26,460.00	\$26,460.00
Scott Douglass & McConnico LLP		\$8,690.00	\$8,690.00
Total	\$213,771.80	\$148,875.90	\$362,647.70
Amount received			<u>(\$126,180.20)</u>
Balance			\$236,467.50

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78756
512-474-1492

February 7, 2020

Invoice submitted to:

Alliance of Xcel Municipalities
c/o Bryan McWilliams, City
Attorney
City of Amarillo
601 S. Buchanan, Ste. 207
Amarillo, TX 79101

In Reference To:

Application of Southwestern Public
Service Company for Authority to
Change Rates
PUC Docket No. 49831
Acct #785

STATEMENT FOR PROFESSIONAL SERVICES

Legal Fees:

		<u>Hrs/Rate</u>	<u>Amount</u>
01/02/20	Leslie Lindsey - Prepare supplemental response to Staff's 1st RFI to AXM send to BF for edits	1.50 145.00/hr	217.50
	Brennan Foley - Review Staff RFIs re: cost allocation and rate design	0.10 350.00/hr	35.00
	Brennan Foley - Review Orion Carbon RFIs	0.10 350.00/hr	35.00
	Brennan Foley - Prepare supplemental responses to Staff RFIs re: RCEs	1.20 350.00/hr	420.00

Alliance of Xcel Municipalities

Page 2

		<u>Hrs/Rate</u>	<u>Amount</u>
01/03/20	Leslie Lindsey - Update edited 3rd supplemental response to Staff's 1st RFI to AXM and prepared AXM 1st supplemental response to Staff's 2nd RFI	1.40 145.00/hr	203.00
	Brennan Foley - Review application, direct testimony ad schedules re: generation issues	1.00 350.00/hr	350.00
	Brennan Foley - Prepare response to Staff RFIs re: RCEs	0.50 350.00/hr	175.00
01/06/20	Sergio E. Herrera - Prepared for call RE: pending expert testimony	1.80 250.00/hr	450.00
	Sergio E. Herrera - Call w/ S. Norwood & K. Nalepa RE: pending testimony	1.00 250.00/hr	250.00
	Leslie Lindsey - Reviewed and updated case file; distributed RFI responses to consultants	0.40 145.00/hr	58.00
	Leslie Lindsey - Send confidential and voluminous files to consultant	0.20 145.00/hr	29.00
	Brennan Foley - Prepare for and participate in conference call with consultants re: generation and cost allocation and rate design issues	3.00 350.00/hr	1,050.00
	Brennan Foley - Prepare RFIs to SPS re: generation issues	0.30 350.00/hr	105.00
01/07/20	Sergio E. Herrera - Call w/ S. Norwood & D. Garrett RE: pending testimony	1.00 250.00/hr	250.00
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 14th set of RFIs to SPS	0.50 145.00/hr	72.50
	Leslie Lindsey - Prepare, format, file and serve on all parties AXM's 15th set of RFIs to SPS	0.50 145.00/hr	72.50

Alliance of Xcel Municipalities

Page 3

		<u>Hrs/Rate</u>	<u>Amount</u>
01/07/20	Leslie Lindsey - Prepare, format, 3rd supplemental response to Staff 1st Set of RFIs to AXM and 1st supplemental response to Staffs 2nd set of RFIs	0.60 145.00/hr	87.00
	Leslie Lindsey - Reviewed and updated case file; upload confidential rfi responses to server, email to attorneys and consultants	0.60 145.00/hr	87.00
	Brennan Foley - Prepare for and participate in conference call with consultants re: depreciation issues	1.00 350.00/hr	350.00
01/08/20	Leslie Lindsey - Complete preparation, format, print, file and serve on all parties AXM's 3rd supplemental response to Staff 1st Set of RFIs, and AXM's 1st supplemental response to Staffs 2nd set of RFIs	1.20 145.00/hr	174.00
01/09/20	Leslie Lindsey - Review and update case file; upload voluminous, conf and hspm to server for distribution to attorneys and consultants	0.60 145.00/hr	87.00
	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	0.50 145.00/hr	72.50
01/11/20	Mariann Wood - Updated discovery spreadsheet	2.40 145.00/hr	348.00
01/14/20	Sergio E. Herrera - Revised denial resolution and AIS	0.50 250.00/hr	125.00
	Alfred R. Herrera - Review and revise draft "denial" resolution and agenda-info sheet	2.10 485.00/hr	1,018.50
	Alfred R. Herrera - Call w/WD re: potential settlement meeting and follow up communications with AXM consultants re: same	1.10 485.00/hr	533.50
01/15/20	Leslie Lindsey - Upload Confidential discovery responses to server and email to consultants and attorneys	0.60 145.00/hr	87.00

Alliance of Xcel Municipalities

Page 4

		<u>Hrs/Rate</u>	<u>Amount</u>
01/18/20	Mariann Wood - Reviewed filings on PUC Interchange and updated case file	1.50 145.00/hr	217.50
01/19/20	Mariann Wood - Reviewed and updated case file; Updated Discovery Spreadsheet	2.80 145.00/hr	406.00
01/20/20	Leslie Lindsey - Download documents and update files on server	0.70 145.00/hr	101.50
	Mariann Wood - Reviewed and updated case file; Updated Discovery Spreadsheet	1.30 145.00/hr	188.50
01/21/20	Sergio E. Herrera - Reviewed AXM CA/RD testimony in prior SPS rate case	3.90 250.00/hr	975.00
	Leslie Lindsey - Prepare and format, AXM's 16th set of RFIs to SPS	0.50 145.00/hr	72.50
01/22/20	Sergio E. Herrera - Reviewed SPS CA/RD testimony in prior SPS rate case	3.30 250.00/hr	825.00
	Alfred R. Herrera - Review Soong Direct	3.60 485.00/hr	1,746.00
	Alfred R. Herrera - Review Bulkley Direct	3.20 485.00/hr	1,552.00
	Leslie Lindsey - Print, file and serve on all parties AXM's 16th set of RFIs to SPS	0.30 145.00/hr	43.50
01/23/20	Mariann Wood - Reviewed and updated case file	0.50 145.00/hr	72.50
01/26/20	Mariann Wood - Reviewed and updated case file; Updated Discovery Spreadsheet	2.20 145.00/hr	319.00
01/27/20	Sergio E. Herrera - Reviewed SPS Witness E. Evans & R. Luth testimony in current rate case	4.10 250.00/hr	1,025.00

Alliance of Xcel Municipalities

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		<u>Hrs/Rate</u>	<u>Amount</u>
01/27/20	Leslie Lindsey - Upload Confidential documents and send to attorneys and consultants	0.90 145.00/hr	130.50
	Mariann Wood - Reviewed and updated case file; Updated Discovery Spreadsheet	1.00 145.00/hr	145.00
01/28/20	Sergio E. Herrera - Reviewed SPS Witness J. Marks' testimony filed in current rate case	1.80 250.00/hr	450.00
	Alfred R. Herrera - Review ROE draft testimony	2.10 485.00/hr	1,018.50
01/29/20	Alfred R. Herrera - Continue review of ROE draft testimony	1.60 485.00/hr	776.00
	Alfred R. Herrera - Continue review of ROE draft testimony	1.30 485.00/hr	630.50
	Mariann Wood - Reviewed and updated case file; Updated Discovery Spreadsheet	2.10 145.00/hr	304.50
01/30/20	Leslie Lindsey - Prepare, format, AXM's 4th and 2nd supplemental responses to Staff RFIs 1-1 and 2-1	1.30 145.00/hr	188.50
	Total Legal Fees:	65.70	\$17,929.50
	Expenses :		
08/01/19	Consultant Invoice - J. Randall Woolridge		26,460.00
10/01/19	Consultant Invoice - Resolve Utility Consulting Inv #265		7,850.00
11/01/19	Consultant Invoice - Resolve Utility Consulting Inv #266		8,250.00
12/01/19	Consultant Invoice - Resolve Utility Consulting Inv #267		6,650.00

Alliance of Xcel Municipalities

Page 6

	<u>Amount</u>
12/01/19 Consultant Invoice - Garrett Group Consulting, Inc.	11,150.00
12/16/19 Consultant Invoice - Scott Douglass & McConnico LLP Inv #255946	8,690.00
01/01/20 Copy expense for the month of January 2020	13.20
Delivery expense for the month of January 2020	78.00
Research on Westlaw for the month of January 2020	46.80
Postage expense for the month of January 2020	2.40
Consultant Invoice - Resolve Utility Consulting Inv #284	11,950.00
Consultant Invoice - ReSolved Energy Consulting, LLC Inv #4543	8,406.00
Consultant Invoice - Norwood Energy Consulting LLC Inv #SPSRate Jan20	12,100.00
Consultant Invoice - Garrett Group, Inc.	29,300.00
Total expenses:	<u>\$130,946.40</u>
TOTAL AMOUNT OF THIS BILL:	<u>\$148,875.90</u>
Previous balance	\$87,591.60
BALANCE DUE	<u><u>\$236,467.50</u></u>

INVOICE

FROM: J. Randall Woolridge, Ph.D.
120 Haymaker Circle
State College, PA 16801

TO: Herrera & Boyle, PLLC
816 Congress Ave., Suite 1250
Austin, Tx 78701

RE: Southwestern Public Service Company
Docket No. 49831

DATE: 2/1/2020
First Billing

785

I. PROFESSIONAL SERVICES AND OVERHEAD					
A. J. RANDALL WOOLRIDGE					
DATE			LOCATION	DESCRIPTION	HOURS
8 /	1 /	2019	State College	Review Overall Case and Documents Prepare Case Summary Prepare Data Requests - Bulkley, Soong, General Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	
HOURS					6.0
9 /	1 /	2019	State College	Review Overall Case and Documents Review Data Request Responses Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	
HOURS					4.0
10 /	1 /	2019	State College	Review Overall Case and Documents Review Data Request Responses Review Testimony and Compare to Previous SPS Rate Cases Review SPS ROR Issues Review Bulkley Testimonies Review Data Request Responses Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	
HOURS					12.0
11 /	1 /	2019	State College	Review Overall Case and Documents Review Electric Utility Company Rate Case Decisions Review Data Request Responses Collect Capital Market Data Prepare Exhibits - Capital Cost Indicators - Electric Utility Companies Collect and Analyze Data - Proxy Groups Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	
HOURS					18.0

INVOICE

FROM: J. Randall Woolridge, Ph.D.
120 Haymaker Circle
State College, PA 16801

TO: Herrera & Boyle, PLLC
816 Congress Ave., Suite 1250
Austin, Tx 78701

RE: Southwestern Public Service Company
Docket No. 49831

DATE: 2/1/2020
First Billing

I. PROFESSIONAL SERVICES AND OVERHEAD				
A. J. RANDALL WOOLRIDGE				
DATE	LOCATION	DESCRIPTION	HOURS	
12 / 1 / 2019	State College	Prepare Proxy Group Prepare Exhibits - Interest Rates, GDP Prepare Exhibits - Capital Cost Indicators - Electric Utility Companies Prepare DCF Study - Collect D/P and Growth Rates Data Prepare Testimony Review Bulkley Work Papers Review Bulkley Excel Exhibits Prepare Credit Rating Study Prepare Exhibits Collect Data/Prepare Capital Structure Study Collect Data/Prepare Relative Risk Study Collect and Analyze Data - Proxy Groups Prepare MRP Study Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	24.0	
HOURS				24.0
1 / 1 / 2020	State College	Prepare Testimony Update MRP Study Prepare EPS - GDP Study Update Exhibits - Capital Cost Indicators - Electric Utility Companies Update DCF Study - Collect D/P and Growth Rates Data Update Capital Markets Data Prepare Testimony Prepare Rebuttal Testimony Prepare Rebuttal Exhibits Update/Prepare Exhibits Update/Prepare Capital Structure Study Prepare/Review/Send Testimony/Exhibits Review Email and Related Documents Research Rate of Return Issues Review Case with Counsel	34.0	
HOURS				34.0
TOTAL HOURS				98.0
PROFESSIONAL SERVICES @ \$270.00/HOUR				\$26,460.00
II. EXPENSES				
a	Travel			
	TRAVEL EXPENSES	\$	-	
b.	1. Office Expenses (Phone, Copying)	\$	-	
	TOTAL EXPENSES		\$	-
TOTAL PROFESSIONAL SERVICES PLUS EXPENSES				\$26,460.00
TOTAL BILLING				\$26,460.00



Resolve Utility Consulting PLLC

101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE

Bill To

Herrera Law & Associates, PLLC

4400 Medical Parkway
Austin, TX 78701

Invoice#

INV-000265

Project Name

SPS 2019 Rate Case
49831

1785

Task & Date	Hours	Rate	Amount
D7 - review and organize service life and net salvage data 10/01/19	3.75	200.00	750.00
D7 - review depreciation study, testimony and exhibits 10/04/19	3.00	200.00	600.00
B7 - review discovery responses and service life data 10/08/19	3.25	200.00	650.00
D7 - review decommissioning studies and observed life tables and exhibits 10/08/19	3.00	200.00	600.00
D7 - review observed life tables and Iowa curve charts, and review net salvage data 10/10/19	3.50	200.00	700.00
D7 - review and organize service life and net salvage data 10/14/19	3.25	200.00	650.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 10/15/19	3.75	200.00	750.00

Task & Date	Hours	Rate	Amount
D7 - review decommissioning studies and observed life tables and exhibits 10/17/19	3.75	200.00	750.00
A1 - review application, schedules, testimony and exhibits 10/21/19	2.50	200.00	500.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 10/23/19	4.00	200.00	800.00
D7 - review observed life tables and Iowa curve charts, and review net salvage data 10/29/19	5.50	200.00	1,100.00
Total Hours 39.25		Total	\$7,850.00
		Balance Due	\$7,850.00



Resolve Utility Consulting PLLC
101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE

Bill To
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78701

Invoice# INV-000266

Project Name SPS 2019 Rate Case,
49831

A handwritten signature, possibly 'JZB', is circled in black ink.

Task & Date	Hours	Rate	Amount
D7 - review vintage retirement data and theoretical reserve calculations 11/02/19	3.75	200.00	750.00
D7 - review theoretical reserve calculations and net salvage tables 11/04/19	4.00	200.00	800.00
D7 - review decommissioning studies and observed life tables and exhibits 11/06/19	3.25	200.00	650.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 11/07/19	3.50	200.00	700.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 11/11/19	3.50	200.00	700.00
D7 - review and organize service life and net salvage data 11/12/19	3.25	200.00	650.00

Task & Date	Hours	Rate	Amount
D7 - review vintage retirement data and theoretical reserve calculations 11/14/19	4.00	200.00	800.00
A1 - review application, schedules, testimony and exhibits 11/18/19	2.75	200.00	550.00
B7 - review discovery responses and service life data 11/19/19	2.50	200.00	500.00
D7 - review theoretical reserve calculations and net salvage tables 11/21/19	3.00	200.00	600.00
D7 - review decommissioning studies and observed life tables and exhibits 11/25/19	3.50	200.00	700.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 11/26/19	4.25	200.00	850.00
Total Hours 41.25		Total	\$8,250.00
		Balance Due	\$8,250.00

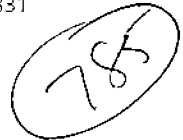


Resolve Utility Consulting PLLC
101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE

Bill To
Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78701

Invoice# INV-000267
Project Name SPS 2019 Rate Case,
49831



Task & Date	Hours	Rate	Amount
A1 - review application, schedules, testimony and exhibits 12/02/19	3.00	200.00	600.00
D7 - review vintage retirement data and theoretical reserve calculations 12/03/19	2.75	200.00	550.00
D7 - review observed life tables and Iowa curve charts, and review net salvage data 12/05/19	4.50	200.00	900.00
D7 - review and organize service life and net salvage data 12/09/19	3.75	200.00	750.00
D7 - review decommissioning studies and observed life tables and exhibits 12/10/19	3.00	200.00	600.00
B7 - review and draft discovery, and review depreciation study 12/12/19	1.75	200.00	350.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 12/17/19	4.50	200.00	900.00

JZB WKP 001044

Task & Date	Hours	Rate	Amount
D7 - review vintage retirement data and theoretical reserve calculations 12/19/19	3.25	200.00	650.00
D7 - review vintage retirement data and theoretical reserve calculations 12/20/19	3.00	200.00	600.00
D7 - review and organize service life and net salvage data 12/27/19	3.75	200.00	750.00
Total Hours 33.25		Total	\$6,650.00
		Balance Due	\$6,650.00

GARRETT GROUP CONSULTING, INC.4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013TELEPHONE (405) 239-2226 E-MAIL MGARRETT@GARRETTGROUPLLC.COM

January 14, 2020

Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701

1785

RE: SPS 2019 Rate Case, PUC Docket No. 49831


Dear Freddy:

Our invoice for professional services in December of 2019 in connection with the above-referenced case follows:

I. Professional Services:		
A.	M. E. Garrett – 30 hours at \$250.00 per hour (Details in Attachment A)	\$7,500.00
B.	Ed Farrar – 13.5 hours at \$150.00 per hour (Details in Attachment B)	\$2,025.00
C.	Garry Garrett – 6 hours at \$125.00 per hour (Details in Attachment C)	\$750.00
II. Expenses:		
	Office Expenses	<u>N/C</u>
III. Total This Invoice:		\$11,150.00

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,

Mark E. Garrett
Attachments

MEG/gg

Attachment A

**Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831**

(Mark Garrett)

December 2019 – 30 Hours

Date	Task	Hours
3	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	4
6	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	4
10	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	4
13	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	6
20	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	6
27	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	2
31	Review testimony, exhibits and workpapers; review and work on discovery; develop issues; work on schedules; work on testimony; work with other consultants in the case.	4
Total		30

Attachment B

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Edwin Farrar)

December 2019 – 13.5 Hours

Date	Task	Hours
6	Review SPS exhibits and discovery responses	3.5
7	Review testimony and exhibits on tax issues	2.0
13	Review testimony and exhibits on tax issues	1.0
14	Review testimony and exhibits on tax issues	1.0
15	Review testimony and exhibits on tax issues	1.0
17	Review other parties discovery and responses	5.0
Total		13.5

Attachment C

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Garry Garrett)

December 2019 – 6 Hours

Date	Task	Hours
4	Develop issues, develop discovery	3
13	Develop discovery	1
17	Develop issues, develop discovery	2
Total		6



Federal I.D. No. 74-1864860

BRENNAN J. FOLEY
HERRERA LAW & ASSOCIATES, PLLC
P.O. BOX 302799
AUSTIN, TX 78703

185

February 6, 2020
Invoice No. 255946

For Professional Services Rendered:

RE: PUC DOCKET NO. 49831 - EXPERT WITNESS

DATE	INITIALS	DESCRIPTION	HOURS
12/16/19	CJW	Teleconference with B. Foley; Preliminary review of case and AXM activities;	2.10
01/17/20	CJW	Review expenses divided by category;	1.50
01/21/20	CJW	Analyze AXM rate case expense issues;	3.20
01/23/20	CJW	Continued analysis of rate case expenses and preliminary draft of testimony;	3.40
01/28/20	CJW	Additional work on rate case expense testimony;	1.40
01/31/20	CJW	Communication with B. Foley regarding data; Review of rate case expense data and information;	4.20

NAME	HOURS	RATE	AMOUNT
CATHERINE J. WEBKING	15.80	550.00	8,690.00
Totals	<u>15.80</u>		<u>8,690.00</u>

TOTAL FEES	\$ 8,690.00
TOTAL EXPENSES	\$ 0.00
TOTAL THIS INVOICE	\$ <u>8,690.00</u>

Scott Douglass & McConnico LLP | Attorneys at Law

303 Colorado Street, Suite 2400, Austin, TX 78701 | p : 512.495.6300 | f : 512.495.6399 | www.scottdoug.com
JZB WKP 001050



Federal I.D. No. 74-1864860

BRENNAN J. FOLEY
HERRERA LAW & ASSOCIATES, PLLC
P.O. BOX 302799
AUSTIN, TX 78703

February 6, 2020
Invoice No. 255946

REMITTANCE PAGE
For Professional Service Rendered

RE: PUC DOCKET NO. 49831 - EXPERT WITNESS

TOTAL FEES	\$ 8,690.00
TOTAL EXPENSES	<u>0.00</u>
TOTAL CURRENT INVOICE	<u>\$ 8,690.00</u>

PLEASE RETURN THIS COPY WITH YOUR PAYMENT

Scott Douglass & McConnico LLP | Attorneys at Law


303 Colorado Street, Suite 2400, Austin, TX 78701 | p : 512.495.6300 | f : 512.495.6399 | www.scottdoug.com
JZB WKP 001051

Copier Account Totals
JANUARY 2020

Account	Printouts	per copy	Total
████	████	X .10	████
████	██	X .10	████
████	████	X .10	████
████	████	X .10	████
████	████	X .10	████
785	132	X .10	\$13.20

**JANUARY 2020
DELIVERY RECAP**

Account #	Cost
■	■
■	■
785	\$78.00

The logo features a black silhouette of the state of Texas. A large, bold, black letter 'M' is superimposed over the right side of the state map.

JZB WKP 001054

Anything, Anytime Anywhere



Magic Couriers, Inc.
(512) 248-8686

Bill to:
Herrera Law Firm
4400 Medical Parkway
Austin, Texas 78705

Invoice for billing period 1-16-19 through 1-29-20

Invoice #: 012920

Date/Time	Service	Address	Reference	Cost
1-22 / 11:40am 1	RT / 2 hr	PUC	785	\$ 26.00
Total				\$

Please remit payments to: ***Magic Couriers, Inc.***
815-A Brazos
276
Austin, TX. 78701

WESTLAW Research

JANUARY 2020

Account #	Research Time	X \$65.00/hr.	+ Excluded Charges	Total
Attorneys				
■	■	X \$65.00		■
■	■	X \$65.00		■
■	■	X \$65.00		■
785	.72	X \$65.00		\$46.80

JANUARY 2020 POSTAGE

ACCOUNT #	TOTAL
785	\$2.40



Resolve Utility Consulting PLLC

101 Park Avenue
Suite 1125
Oklahoma City, Oklahoma 73102
(405) 249-1050

INVOICE

Bill To

Herrera Law & Associates, PLLC
4400 Medical Parkway
Austin, TX 78701

Invoice#

INV-000284

Project Name

SPS 2019 Rate Case
49831

A handwritten signature, possibly 'JZB', is circled in black ink.

Task & Date	Hours	Rate	Amount
D7 - review Iowa curve fitting, remaining life calculations, and testimony 01/02/20	4.50	200.00	900.00
D7 - review depreciation study, testimony and exhibits 01/06/20	3.50	200.00	700.00
D7 - conference with counsel and review net salvage data 01/07/20	2.25	200.00	450.00
D7 - review and organize service life and net salvage data 01/09/20	3.00	200.00	600.00
D7 - review Iowa curve fitting, remaining life calculations, and testimony 01/13/20	5.00	200.00	1,000.00
D7 - build workpapers and review remaining life calculations 01/16/20	3.25	200.00	650.00
D7 - review observed life tables and Iowa curve charts, and review net salvage data 01/20/20	4.00	200.00	800.00

Task & Date	Hours	Rate	Amount
D7-- review depreciation study, testimony and exhibits 01/22/20	3.50	200.00	700.00
D7 - build workpapers and review remaining life calculations 01/23/20	3.75	200.00	750.00
D7 - review and revise preliminary adjustments and submit draft 01/27/20	6.50	200.00	1,300.00
D7 - draft testimony and exhibits and build workpapers 01/28/20	4.25	200.00	850.00
D7 - draft testimony, review remaining life calculations and Iowa curve fitting 01/29/20	5.75	200.00	1,150.00
D7 - draft testimony and exhibits and build workpapers 01/30/20	5.00	200.00	1,000.00
D7 - draft testimony, review remaining life calculations and Iowa curve fitting 01/31/20	5.50	200.00	1,100.00
Total Hours 59.75		Total	\$11,950.00
		Balance Due	\$11,950.00

ReSolved Energy Consulting, LLC

11044 Research Blvd, A-420
Austin, TX 78759

Invoice

DATE	INVOICE NUMBER
2/3/2020	4543

BILL TO

Herrera Law & Associates, PLLC
Alfred Herrera
4400 Medical Parkway
Austin, Texas 78701

1785

PROJECT
HL SPS 19 RC 49831

DESCRIPTION	HOURS	RATE	AMOUNT
Consulting (Nalepa)	17.4	270.00	4,698.00
Consulting (Cromleigh)	20.6	180.00	3,708.00
Total Labor			8,406.00
Work Completed thru - January 31, 2020		TOTAL DUE	\$8,406.00

Monthly Recap

Karl Nalepa

Date	Task	Hours
January 3, 2020	B15 Emails with B. Foley regarding discovery. Review discovery.	0.50
January 6, 2020	B15 (1.0), D15 (2.0) Call with B. Foley and S. Norwood to discuss case issues. Research past cases and testimony. Prepare additional discovery on base rate fuel issues and send to B. Foley for review.	3.00
January 7, 2020	B15 (0.70), D15 (1.0) Complete and send additional discovery to B. Foley. Review COS model with E. Cromleigh. Identify issues with operation of the model. Send informal discovery to B. Foley.	1.70
January 8, 2020	C1 Update cities' denial resolution with updated rate impacts.	1.50
January 9, 2020	C1 Complete updates to denial resolution and send to B. Foley. Emails with B. Foley to discuss.	1.40
January 10, 2020	B15 Review responses to discovery.	1.00
January 13, 2020	B15 (0.3), D15 (0.9) Update and review discovery database. Work on analysis.	1.20
January 15, 2020	B15 Download and review responses to discovery.	0.30
January 17, 2020	B15 (0.2), D15 (0.8) Review responses to discovery. Call with M. Luth to discuss operation of COS models.	1.00
January 20, 2020	B14 (0.3), B15 (0.2) Compile and send materials supporting rate case expense invoices to B. Foley. Review discovery database.	0.50
January 24, 2020	B15 (0.3), D15 (1.0) Review discovery. Work on analysis.	1.30
January 27, 2020	B15 (0.3), E15 (0.4) Review discovery database. Review ROR and depreciation adjustments.	0.70
January 28, 2020	E15 Review accounting adjustments.	0.30
January 29, 2020	E15 Review draft testimony.	1.00
January 30, 2020	B15 (0.3), E15 (0.5) Review responses to discovery. Work on COS model inputs with E. Cromleigh.	0.80
January 31, 2020	E15 Work on draft testimony. Work on COS model inputs.	1.20

17.40

Monthly Recap

Erin Cromleigh

Date	Task	Hours
January 7, 2020	B15 Review COSS model and compile RFIs.	2.10
January 17, 2020	D15 Call with M. Luth to discuss COSS model.	0.40
January 28, 2020	E15 Draft testimony.	2.50
January 29, 2020	E15 Draft testimony and review adjustments for COSS model.	5.50
January 30, 2020	E15 Compile adjustments into COSS model. Discuss with K. Nalepa.	5.60
January 31, 2020	E15 Compile adjustments into COSS model.	4.50
		20.60

Norwood Energy Consulting, L.L.C.

P. O. Box 30197
Austin, Texas 78755-3197
scott@scottnorwood.com
(512) 297-1889

Mr. Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701

Date: 2-4-20
Tax ID #: 26-2374359
Invoice#:SPSRate JAN20

185

Re: SPS Base Rate Case Analysis - PUC Docket No. 49831

Statement for professional services rendered 1-1-20 through 1-31-20

<u>Date</u>	<u>Code/Description (see page 2 for code descriptions)</u>	<u>Hours</u>
1-02-20	B, D, 3, 4 - Reviewed RFIs on Tolk issues; drafted RFIs	7.0 hrs
1-03-20	B, D, 2, 5 - Reviewed RFIs on Tolk retirement; drafted RFIs	5.0 hrs
1-06-20	B, D, 2, 4 - Reviewed RFIs on capital additions; drafted RFIs	7.5 hrs
1-07-20	D, 2, 4 - Reviewed RFIs on plant outages	2.0 hrs
1-14-20	D, 3, 4 - Reviewed RFI responses on Tolk optimization	6.0 hrs
1-27-20	D, E, 2, 5 - Reviewed generation outages and retirement dates; worked on testimony outline	5.0 hrs
1-28-20	D, E, 2, 4 - Reviewed capital additions and results of Tolk operating plan analyses	7.5 hrs
1-30-20	B, D, E, 2, 4 - Reviewed plant retirements, and O&M adjustments, and Tolk operating analyses; drafted testimony	8.0 hrs
1-31-20	B, D, E, 2, 4 - Reviewed plant retirements, and O&M adjustments, and Tolk operating analyses; drafted testimony	<u>7.0 hrs</u>
Total hours:		55.0 hrs

Total due: 55.0 hours at \$220 per hour = \$12,100

Thank you for the opportunity to assist with this project.

Substantive Issue Codes

- 1 General overview of rate-filing package/testimonies
- 2 Generation, Transmission and Distribution
- 3 Hale Wind Facility
- 4 Tolk Plant
- 5 Purchased Power
- 6 Accounting and Taxes
- 7 Depreciation
- 8 Cost of Capital
- 9 Vegetaion Management
- 10 Affiliate Expenses
- 11 Wholesale Sales
- 12 SPP Issues
- 13 Off-System Sales
- 14 Rate Case Expenses
- 15 Cost Allocation/Rate Design

Phase of Case Codes

- A Initial Review of Application and Schedules
- B Discovery
- C Procedural Issues
- D Research/Collation of Analysis
- E Preparation of Testimony
- F Settlement
- G Hearing on the Merits
- H Exceptions and Reply to Exceptions
- J Motions and Reply to Motions for Rehearing
- K Appeals of PUCT Final Order

GARRETT GROUP CONSULTING, INC.

4028 OAKDALE FARM CIRCLE
EDMOND, OK 73013TELEPHONE (405) 239-2226 E-MAIL MGARRETT@GARRETTGROUPLLC.COM

February 7, 2020

Alfred R. Herrera
Herrera Law & Associates, PLLC
816 Congress Avenue, Suite 950
Austin, Texas 78701*RE: SPS 2019 Rate Case, PUC Docket No. 49831*

Dear Freddy:

Our invoice for professional services in January of 2020 in connection with the above-referenced case follows:

I.	Professional Services:	
A.	M. E. Garrett – 48 hours at \$250.00 per hour (<i>Details in Attachment A</i>)	\$12,000.00
B.	H. A. Garrett – 24 hours at \$225.00 per hour (<i>Details in Attachment B</i>)	\$5,400.00
C.	Ed Farrar – 66 hours at \$150.00 per hour (<i>Details in Attachment C</i>)	\$9,900.00
D.	Garry Garrett – 16 hours at \$125.00 per hour (<i>Details in Attachment D</i>)	\$2,000.00
II.	Expenses:	
	Office Expenses	<u> N/C </u>
III.	Total This Invoice:	\$29,300.00

We appreciate the opportunity to work with you on this case. Please call me if you have any questions.

Sincerely,

Mark E. Garrett
Attachments

MEG/gg

Attachment A
Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831
(Mark Garrett)

January 2020 – 48 Hours

Date	Task	Hours
13	Review testimony, exhibits and discovery; develop issues	4
14	Review testimony, exhibits and discovery; develop issues	4
20	Review testimony, exhibits and discovery; develop issues	6
23	Review testimony, exhibits and discovery; develop testimony	4
26	Draft testimony and exhibits	4
29	Draft testimony and exhibits	4
30	Draft testimony and exhibits	6
31	Draft testimony and exhibits	6
Total		48

Attachment B

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Heather Garrell)

January 2020 – 24 Hours

Date	Task	Hours
23	Develop testimony and exhibits	4
28	Develop testimony and exhibits	6
29	Develop testimony and exhibits	6
30	Develop testimony and exhibits	4
31	Develop testimony and exhibits	4
Total		24

Attachment C

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Edwin Farrar)

January 2020 – 66 Hours

Date	Task	Hours
2	Review other parties' discovery	3
3	Perform rate case analysis of discovery responses and exhibits	4
6	Perform rate case analysis of discovery responses and exhibits	2
9	Review discovery responses	1
11	Review issues	1
12	Review issues	6
13	Review issues, draft adjustments	2
14	Review rate case issues and discovery responses	3
15	Review issues, draft adjustments	2
16	Review testimony, work papers, and discovery	3
17	Review issues, draft testimony	5
18	Review discovery, perform analysis, draft testimony	5
19	Review discovery, perform analysis, draft testimony	5
20	Draft testimony	1
21	Review testimony and exhibits	5
25	Review discovery	2
26	Review discovery and testimony	2
27	Review issues, draft adjustment, review work papers	5
28	Draft testimony	2
30	Review and revise draft testimony and exhibits	3
31	Review and revise draft testimony and exhibits	4
Total		66

Attachment D

Consulting Tasks for SPS 2019 Rate Case
Docket No. PUC 49831

(Garry Garrett)

January 2020 – 16 Hours

Date	Task	Hours
9	Review discovery, develop issues	4
15	Develop issues	2
21	Develop discovery, develop issues	4
27	Develop issues, develop testimony	4
29	Develop issues, develop testimony	2
Total		16

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

REVENUE REQUIREMENT PHASE

DIRECT TESTIMONY OF

CATHERINE J. WEBKING

REGARDING RATE CASE EXPENSES

ON BEHALF OF

ALLIANCE OF XCEL MUNICIPALITIES

February 10, 2020

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY FOR	§	OF
AUTHORITY TO CHANGE RATES	§	ADMINISTRATIVE HEARINGS

**REVENUE REQUIREMENT PHASE
DIRECT TESTIMONY OF CATHERINE J. WEBKING**

I.	INTRODUCTION AND BACKGROUND	1
II.	PURPOSE AND SCOPE	2
III.	REASONABLENESS OF LEGAL FEES AND EXPENSES	4
IV.	REASONABLENESS OF PROFESSIONAL FEES AND EXPENSES	5
V.	SUMMARY AND CONCLUSION	7

ATTACHMENTS:

- CJW-1 Resume of Catherine J. Webking

- CJW-2 Affidavit of Alfred R. Herrera including Rate Case Summary spreadsheet, AXM's Docket No. 49831 rate case expenses, copies of AXM's invoices (Provided on the Attached CD)

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES	§ § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**REVENUE REQUIREMENT PHASE
DIRECT TESTIMONY OF CATHERINE J. WEBKING**

I. INTRODUCTION AND BACKGROUND

Q. PLEASE STATE YOUR NAME, OCCUPATION, AND ADDRESS.

A. My name is Catherine J. Webking and I am a partner at the law firm of Scott, Douglass & McConnico LP. My office address is 303 Colorado St. Suite 2400, Austin, TX 78701.

Q. PLEASE DESCRIBE YOUR OCCUPATION AND EDUCATIONAL BACKGROUND.

A. I am an attorney in good standing with the State Bar of Texas and have been practicing continually since receiving my license to practice law in Texas in 1991. I graduated with a Bachelor of Science in Chemical Engineering from Texas A&M University in 1985. After working as an engineer with a major oil and gas company for a few years, I continued my education at the University of Texas School of Law where I earned a Doctorate of Jurisprudence with honors in 1991.

Particularly, I have extensive practice in the area of public utility law and have practiced before the Public Utility Commission of Texas and the State Office of Administrative Hearings for the entirety of my legal practice. I have represented a variety of parties in contested cases involving electric rates, rulemakings and other contested case proceedings. My resume is included with this testimony as Attachment CJW-1.

Q. ON WHOSE BEHALF ARE YOU TESTIFYING?

A. I am testifying on behalf of the Alliance of Xcel Municipalities ("AXM") with regard to the rate case expenses for which they seek reimbursement in this proceeding.

1 **Q. ARE YOU FAMILIAR WITH THE RATE CASE EXPENSES WHICH AXM**
2 **SEEKS TO RECOVER IN THIS PROCEEDING?**

3 A. Yes. I have reviewed those expenses and am familiar with the underlying proceedings to
4 which they relate.

5 **Q. HAVE YOU EVER TESTIFIED BEFORE THE PUBLIC UTILITY COMMISSION**
6 **BEFORE?**

7 A. Yes, I have provided testimony on rate case expenses in PUC Docket No. 47141; Review
8 of Rate Case Expenses Incurred by Southwestern Electric Power Company and
9 Municipalities in Docket No. 46449.

10 **II. PURPOSE AND SCOPE**

11 **Q. WHAT IS THE PURPOSE AND SCOPE OF YOUR TESTIMONY?**

12 A. The purpose and scope of my testimony is to identify and assess the reasonableness of the
13 rate case expenses incurred on behalf of AXM in this proceeding and in the other dockets
14 for which AXM's seeks reimbursement.

15 My testimony describes my review of those expenses and my determination of the
16 reasonableness of those expenses. This chart summarizes the legal fees and expenses and
17 the consultants' fees and expenses that I reviewed:

Docket No.		Legal Fees and Expenses	Consulting Fees and Expenses	Status
47857	Interim Power Factor Surcharge	\$6,908.50	\$0	Final Order Issued June 2018
48847	Fuel Factor and Formulas	\$24,510.96	\$24,530.00	Settlement – dismissed with issues moved to 49616
48498	Interim Power Factor Surcharge	\$2,579.30	\$1,443.75	Final Order March 2019 (by Agreement)
48886	Surcharge from 47527	\$4,784.20	\$2,592.00	Final Order June 2019 (by Agreement)
48973	Fuel Rec and Purchased Power	\$180,596.45	\$78,258.00	Hearing with Final Order December 2019 Motion for Rehearing pending
49616	Fuel Factor	\$38,259.18	\$23,540.00	Settlement pending
49831	Rate Case	\$142,846.70	\$219,801.00	Active HOM begins in March 2020
Total		\$400,485.29	\$350,164.75	\$750,650.04

2 I have reviewed the Affidavit of Alfred R. Herrera included with my testimony as
3 Attachment CJW-2 describing the specific expenses at issue and the nature of the
4 underlying work performed. The underlying detail of the expenses broken out by category
5 for this rate proceeding were part of my review and are provided in the spreadsheet
6 included with this testimony at Attachment CJW-2. I have also reviewed AXM's response
7 to Staff's First and Second RFIs and the supplements thereto.

1 **Q. WHAT FACTORS DID YOU CONSIDER IN REVIEWING THE**
2 **REASONABLENESS OF THE LEGAL AND PROFESSIONAL FEES AND**
3 **EXPENSES?**

4 A. I have reviewed the fees and expenses under the standards set out by the Commission in
5 16 Tex. Admin. Code § 25.245 (“TAC”). Based on these standards, I recommend that the
6 Commission determine that AXM’s expenses are reasonable and recoverable under Public
7 Utility Regulatory Act, Tex. Util. Code §33.023.

8 **III. REASONABLENESS OF LEGAL FEES AND EXPENSES**

9 **Q. WHAT ARE THE LEGAL FEES AND EXPENSES FOR WHICH AXM SEEKS**
10 **REIMBURSEMENT?**

11 A. AXM was represented by the law firm Herrera Law & Associates, PLLC in the above
12 identified cases. The legal services were performed by Mr. Alfred R. Herrera and his
13 associates and legal assistants. The fees and expenses billed by Herrera Law & Associates,
14 PLLC are the legal expenses and fees for which AXM seeks reimbursement.

15 **Q. HAVE YOU REVIEWED THOSE FEES AND EXPENSES AND DETERMINED**
16 **THAT THEY ARE REASONABLE?**

17 A. Yes. Based on my review of the fees and expenses charged by the firm Herrera Law &
18 Associates, PLLC, I have determined that the legal fees and expenses for which AXM
19 seeks recovery are reasonable. I have reviewed the hourly rates and the time spent given
20 the complexity of the issues in the underlying contested cases including discovery and any
21 hearings. Based on the active participation of Herrera Law & Associates, PLLC and the
22 experience of the attorneys and other legal staff for the firm who contributed to the cases,
23 I have determined that the legal fees and expenses identified above are reasonable, not
24 excessive, and not duplicative.

25 I have personal knowledge of the legal skills and experience of Mr. Herrera and have
26 participated in numerous contested cases where we both represented parties involved in
27 complex contested cases before SOAH and the PUC. Given Mr. Herrera’s extensive
28 experience and the experience of the other attorneys who billed time to these cases, it is
29 my opinion that the hourly rates for the legal services performed are in the low to mid-
30 range of billing rates of other attorneys in this practice area. The hourly rates billed are

1 reasonable and compare favorably to the rates of other attorneys representing
2 municipalities in similar contested rate cases.

3 AXM represented at least 14 different municipalities throughout the SPS service area in
4 non-general rate cases, typically, fuel-related cases; in general rate cases, AXM is
5 comprised of about 80 municipalities throughout the SPS service area. AXM has been the
6 only active group of municipalities in this case and the underlying cases that are included
7 in this request for rate case expense recovery.

8 The level of participation of AXM is commensurate with the scope and complexity of the
9 issues and the amount of SPS's revenues that were under consideration in each case. In all
10 proceedings, as appropriate, AXM both served discovery requests and responded to
11 discovery requests propounded by other parties that was typical with the level of discovery
12 in a proceeding of that magnitude. In those proceedings which have concluded, AXM
13 submitted thorough briefing where appropriate on all material issues and participated in
14 the hearing on the merits as well as in the exceptions and motions for rehearing process
15 following the Commission's final order.

16 For the current rate case, Docket No. 49831, AXM has allocated its time according to issue
17 and phase of the case as required by 16 TAC § 25.245(b)(6). The final expenses for this
18 proceeding are not yet known, but will be updated as the case progresses. In addition, for
19 the other past proceedings for which rate case expense recovery and reimbursement is at
20 issue in this case, each of those proceedings were narrower in scope and the activities of
21 AXM covered by legal and consulting fees and expenses were reasonably undertaken in
22 furtherance of their positions taken in those proceedings.

23 **IV. REASONABLENESS OF PROFESSIONAL FEES AND EXPENSES**

24 **Q. WHAT ARE THE PROFESSIONAL FEES AND EXPENSES FOR WHICH AXM** 25 **SEEKS REIMBURSEMENT?**

26 A. The professional fees and expenses of the following consulting firms are the professional
27 fees for which AXM seeks reimbursement.

Consulting Firm	Expert Witness	Dockets
Utilitech, Inc.	Michael Brosch	48478
Garrett Group LLC	Mark Garrett	49831
Norwood Energy Consulting	Scott Norwood	49831, 48973, 49616, and 48847
ReSolved Energy Consulting	Karl Nalepa	49831, 48973 and 48886
Resolve Utility Consulting	David Garrett	49831
J. Randall Woolridge, Ph. D.	J. Randall Woolridge	49831
Scott, Douglass & McConnico LP	Catherine Webking	49831

Q. HAVE YOU REVIEWED THOSE FEES AND EXPENSES AND DETERMINED THAT THEY ARE REASONABLE?

A. Yes, I have reviewed these fees and expenses and have determined them to be reasonable. Each of the witnesses identified above filed testimony that was reasonable in scope and was not duplicative of another AXM witness's testimony. Each witness who produced testimony in the above-dockets and those who recorded expenses in these dockets assisted in review and analysis of discovery in each proceeding in addition to providing testimony. Each expert-witness firm's recorded billings are based on reasonable hourly rates and their total billings to the Commission's legal standards. I have also reviewed each firm's expenses, which were supported with reasonable detail and were not excessive or duplicative.

1 **V. SUMMARY AND CONCLUSION**

2 **Q. PLEASE SUMMARIZE YOUR TESTIMONY AND STATE YOUR**
3 **CONCLUSIONS.**

4 A. I have reviewed the legal and professional fees and expenses for which AXM seeks
5 reimbursement and have found them to be reasonable under the applicable legal standards.
6 I conclude that the hourly rates and expenses for legal and professional fees which are
7 detailed in Exhibit CJW-2 and CJW-3 are reasonable to support AXM's participation in
8 the four contested cases that are covered by this testimony. Accordingly, the total rate case
9 expenses that are reasonable for reimbursement for AXM in this proceeding are
10 \$\$750,650.04.

11 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

12 A. Yes.

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY FOR § OF
AUTHORITY TO CHANGE RATES § ADMINISTRATIVE HEARINGS**

**REVENUE REQUIREMENT PHASE
DIRECT TESTIMONY OF CATHERINE J. WEBKING
REGARDING RATE CASE EXPENSES**

ATTACHMENT CJW-1:

RESUME OF CATHERINE J. WEBKING

**Catherine J. Webking
Curricula Vitae**

Legal Experience

Law practice encompasses advocacy in Texas regulatory matters, especially in the areas of public utility law involving electricity, telecommunications, water, and natural gas. More than 25 years of law practice result in a deep understanding of Texas' utility regulatory environment and its migration to competitive services in the relevant markets. This experience involves extensive contested case hearing experience and other regulatory matters before the Public Utility Commission of Texas, the Railroad Commission of Texas, and the State Office of Administrative Hearings.

2016 – Present	Scott, Douglass, & McConnico LP, Partner
2012 – 2015	Gardere Wynne Sewell LLP, Partner
1999 – 2011	Webking McClendon, PC, Principal (formerly Catherine J. Webking Law Offices)
1997 – 1999	Akin, Gump, Strauss, Hauer, & Feld, LP
1995 – 1997	Haynes and Boone, LP
1991 – 1995	McGinnis, Lochridge, & Kilgore, LP

Recognition and Awards

Chambers USA – Energy: Texas State Regulatory & Litigation (Electricity)

Best Lawyers in America

Order of the Coif

Bar Admissions & Activities

Fellow, Texas Bar Foundation

State Bar of Texas – Administrative Law Section

Travis County Bar Association – Public Utility Law Section

Gulf Coast Power Association

Education

Texas A&M University, B. S., Chemical Engineering

University of Texas Law School, J. D., with honors, 1991

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

**APPLICATION OF SOUTHWESTERN § BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY FOR § OF
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**REVENUE REQUIREMENT PHASE
DIRECT TESTIMONY OF CATHERINE J. WEBKING
REGARDING RATE CASE EXPENSES**

ATTACHMENT CJW-2:

Affidavit of Alfred R. Herrera including Rate Case Summary spreadsheet, AXM's Docket No. 49831 rate case expenses, copies of AXM's invoices (Provided on the Attached CD)

**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY FOR AUTHORITY TO CHANGE RATES	§ § § § §	BEFORE THE STATE OFFICE OF ADMINISTRATIVE HEARINGS
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**AFFIDAVIT OF ALFRED R. HERRERA RELATED TO RATE CASE EXPENSES
INCURRED BY ALLIANCE OF XCEL MUNICIPALITIES**

**STATE OF TEXAS §
 §
COUNTY OF TRAVIS §**

Before me, the undersigned authority, on this day personally appeared Alfred R. Herrera, being by me first duly sworn, on oath deposed and said the following:

1. My name is Alfred R. Herrera, and I am a principal of Herrera Law & Associates, PLLC (“Herrera Law & Associates” or “HLA”). I have over 36 years of experience in legal and legislative matters related to the utility industry (telecommunication, electric, water/wastewater, and gas). I have served as lead counsel in numerous litigated rate proceedings involving utilities.
2. The Alliance of Xcel Municipalities (“AXM”) retained Herrera Law & Associates in connection with *PUC Docket No. 49831, Application of Southwestern Public Service Company for Authority to Change Rates*.
3. AXM also retained Herrera Law & Associates in connection with the following proceedings:
 - A. *PUC Docket No. 47857, Application of Southwestern Public Service Company for Authority to Implement an Interim Power Factor Surcharge;*
 - B. *PUC Docket No. 48498, Application of Southwestern Public Service Company for Authority to Update an Interim Power Factor Surcharge [DN 45524 & DN 47857];*
 - C. *PUC Docket No. 48847, Application of Southwestern Public Service Company for Authority to Revise Its Fuel Factor Formulas; Change Its Fuel Factors; and for Related Relief;*

- D.** *PUC Docket No. 48886, Application of Southwestern Public Service Company for Authority to Implement a Surcharge Associated with Docket No. 47527;*
 - E.** *PUC Docket No. 48973, Application of Southwestern Public Service Company for Authority to Reconcile Fuel and Purchased Power Costs for the Period January 1, 2016 Through June 30, 2018;*
 - F.** *PUC Docket No. 49616, Application of Southwestern Public Service Company for Authority to Revise Its Fuel Factor Formulas; Change Its Fuel Factors; and for Related Relief*
 - G.** *PUC Docket No. 49831, Application of Southwestern Public Service Company for Authority to Change Rates*
- 4.** I am familiar with the work performed by Herrera Law & Associates, PLLC and the technical consultants engaged on behalf of AXM in connection with the proceedings I note above. I am over 18 years of age and I am not disqualified from making this affidavit. My statements are true and correct.
 - 5.** The firm of Herrera Law & Associates, PLLC provided services to AXM in the dockets I note above including, but not limited to, the following activities: the provision of legal advice and strategy; negotiating schedules and substantive issues; identification of consultants and recommendations to AXM regarding engagement of consultants; coordination of issue development; legal research; preparation and filing of pleadings, briefs, discovery and pre-filed testimony; preparation for and participating in prehearing conferences, Open Meetings, and hearings on the merits; and briefing clients and discussions with consultants.
 - 6.** I am responsible for coordinating and supervising the efforts of my firm's personnel pertaining to the services rendered to AXM in the dockets I note above. I have personally reviewed the billings for all work performed (legal and consulting) in connection with the proceedings I note above.
 - 7.** Herrera Law & Associates, PLLC transmits our firm's and consultants' invoices and backup materials showing the fees and expenses related to the proceedings I note above to the City of Amarillo for review and approval. The City of Amarillo makes available those invoices to the AXM Steering Committee for its review. Once that review is completed, the City of Amarillo forwards the approved invoices to Southwestern Public Service Company ("SPS") for reimbursement. My firm's billings are reasonable and necessary for development of the record and advocacy of AXM's position on the issues in the cases I note above. As a matter of standard operating procedure, we avoid the duplication of effort in providing our services to AXM.
 - 8.** My firm's billing rates for governmental clients for our attorneys ranges from \$250.00 to \$485.00 per hour. My current billing rate is \$485.00 per hour. These billing rates are reasonable, consistent with the rates billed to other governmental clients for similar work, and comparable to rates charged by other professionals with the same level of expertise and

experience. Herrera Law & Associates, PLLC's rates are at the low- to mid-range of reasonable hourly rates compared to the rates charges by other lawyers with similar experience providing similar services.

9. ***PUC Docket No. 47857 (Interim Power Factor Surcharge)***: For the period January 1, 2018 through January 31, 2020, Herrera Law & Associates billed \$6,908.50 related to *PUC Docket No. 47857*. The time and resources expended and expenses incurred through January 31, 2020 were necessary to advise AXM on SPS's rate filing, review the application, identify issues, coordinate activities, retain and work with consultants, engage in limited discovery, draft pleadings, and prepare and attend settlement meetings with the parties, and attend the Open Meeting. Invoices for *PUC Docket No. 47857* are provided at Exhibit 1.
10. ***PUC Docket No. 48498 (Interim Power Factor Surcharge)***: For the period August 1, 2018 through January 31, 2020, Herrera Law & Associates has billed \$4,023.05 related to *PUC Dockets Nos. 48498*. This figure includes \$2,579.30 in legal fees and expenses and \$1,443.75 in consultant fees and expenses. The time and resources expended and expenses incurred through January 31, 2020 were necessary to advise AXM on SPS's rate filing, review the application, identify issues, coordinate activities, retain and work with consultants, engage in limited discovery, draft pleadings, and prepare and attend settlement meetings with the parties, and attend the Open Meeting. Invoices for incurred fees in *PUC Docket Nos. 48498* are provided at Exhibit 2.
11. ***PUC Docket No. 48847 (Revise Fuel Factor Formulas)***: For the period November 1, 2018 through January 31, 2020, Herrera Law & Associates billed \$49,040.96 related to *PUC Docket No. 48847*. This figure includes \$24,510.96 in legal fees and expenses, and \$24,530.00 in consultant fees and expenses. The time and resources expended and expenses incurred were necessary to advise AXM regarding SPS's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, review testimonies, and prepare for and attend hearings, participate in settlement meetings, and attend the Open Meeting. Invoices for *PUC Docket No. 48847* are provided at Exhibit 3.
12. ***PUC Docket No. 48886 (Implement Surcharge Associated with Docket No. 47527)***: For the period November 1, 2018 through January 31, 2020, Herrera Law & Associates billed \$7,376.20 related to *PUC Docket No. 48886*. This figure includes \$4,784.20 in legal fees and expenses, and \$2,592.00 in consultant fees and expenses. The time and resources expended and expenses incurred through January 31, 2020 were necessary to advise AXM on SPS's rate filing, review the application, identify issues, coordinate activities, retain and work with consultants, engage in limited discovery, draft pleadings, and prepare and attend settlement meetings with the parties, and attend the Open Meeting. Invoices for *PUC Docket No. 48886* are provided at Exhibit 4.
13. ***PUC Docket No. 48973 (Reconcile Fuel and Purchased Power Costs)***: For the period December 1, 2018 through January 31, 2020, Herrera Law & Associates billed \$258,854.45 related to *PUC Docket No. 48973*. This figure includes \$180,596.45 in legal fees and expenses, and \$78,258.00 in consultant fees and expenses. The time and resources

expended and expenses incurred were necessary to advise AXM regarding SPS's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, and prepare for and attend hearings, prepare post-hearings pleadings, including exceptions and reply to exceptions to the proposal for decision, and attend Open Meetings, including post-open-meeting briefings. Invoices for *PUC Docket No. 48973* are provided at Exhibit 5.

14. ***PUC Docket No. 49616 (Revise Its Fuel Factor Formulas & Fuel Factors)***: For the period June 1, 2019 through January 31, 2020, Herrera Law & Associates billed \$61,799.18 related to *PUC Docket No. 49616*. This figure includes \$38,259.18 in legal fees and expenses, and \$23,540.00 in consultant fees and expenses. The time and resources expended and expenses incurred were necessary to advise AXM regarding SPS's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, review testimonies, and prepare for and attend hearings, and prepare for and participate in settlement meetings. Invoices for *PUC Docket No. 49616* are provided at Exhibit 6.
15. ***PUC Docket No. 49831 (2019 Statement of Intent)***: For the period August 1, 2019 through January 31, 2020, Herrera Law & Associates billed \$362,647.70.70 related to *PUC Docket No. 49831*. This figure includes \$142,846.70 in legal fees and expenses, and \$219,801.00 in consultant fees and expenses. To date, the time and resources expended and expenses incurred were necessary to advise AXM regarding SPS's application, review the application, identify issues, coordinate activities, retain and work with consultants, engage in discovery, draft pleadings, review testimonies, and prepare for and attend hearings. Invoices for *PUC Docket No. 49831* are provided at Exhibit 7
16. The attorney hourly rates upon which the billings shown in Exhibit B are based, are comparable to hourly rates charged to other clients for comparable services during the same time frame and are reasonable, consistent with the rates billed to others for similar work, and comparable to rates charged by other professionals with the same level of expertise and experience.
17. The amounts charged for our services are reasonable and there has been no double billing of fees or expenses. Our firm does not charge its governmental clients for meal expenses. Also, we have not incurred or billed for luxury items, first-class airfare, limousines, alcohol, sporting events, or entertainment.
18. The hours spent to perform the tasks assigned to Herrera Law & Associates were necessary to complete the required tasks in a professional manner on a timely basis. My many years of experience in working with and supervising attorneys and consultants in proceedings at the Public Utility Commission of Texas ("Commission" or "PUC"), as well as the Railroad Commission of Texas, facilitates efforts to keep rate-case expenses reasonable.
19. David Garrett received a B.B.A. with a major in Finance, an M.B.A. and a Juris Doctor from the University of Oklahoma. He worked in private legal practice for several years before accepting a position as assistant general counsel at the Oklahoma Corporation Commission ("OCC") in 2011. At the OCC, he worked in the Office of General Counsel

in regulatory proceedings. In 2012, he began working for the Public Utility Division as a regulatory analyst providing testimony in regulatory proceedings. After leaving the OCC, he formed Resolve Utility Consulting, PLLC, where he has represented various consumer groups, state agencies, and municipalities in utility regulatory proceedings, primarily in the areas of cost of capital and depreciation. He is a Certified Depreciation Professional with the Society of Depreciation Professionals. He is also a Certified Rate of Return Analyst with the Society of Utility and Regulatory Financial Analysts. A more complete description of Mr. D. Garrett's qualifications and regulatory experience is included in his curriculum vitae in *PUC Docket No. 49831*.

20. Mr. D. Garrett's time and efforts in *PUC Docket No. 49831* were coordinated by me and by attorneys working under my direction. Because of Mr. D. Garrett's extensive background, experience and familiarity with SPS, Mr. D. Garrett was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. D. Garrett's time, effort and associated fees in *PUC Docket No. 49831* of \$42,500.00 are reasonable and necessary. Mr. D. Garrett's resume is attached to his direct testimony as Exhibit DJG-1 in *PUC Docket No. 49831*.
21. Karl Nalepa holds a Bachelor of Science degree in Mineral Economics and a Master of Science degree in Petroleum Engineering, and is a certified mediator. He has been a partner in ReSolved Energy Consulting since July 2011, but joined R.J. Covington Consulting, its predecessor firm, in June 2003 as a Management Consultant. Before that he served for more than five years as an Assistant Director with the Texas Railroad Commission ("RRC"). In this position, he was responsible for overseeing the economic regulation of natural gas utilities in Texas. And prior to that, he spent five years with two different consulting firms providing advice regarding a broad range of electric and natural gas industry issues. Before that, he served four years as a Fuels Analyst with the Public Utility Commission of Texas ("PUC"). His professional career began with eight years in the reservoir engineering department of the exploration company affiliated with Transco Gas Pipeline, a major interstate pipeline company. His Statement of Qualifications is included in his testimony in *PUC Docket No. 49831*.
22. Mr. Nalepa's time and efforts in *PUC Docket Nos. 48886, 48973, and 49831* were coordinated by me and by attorneys working under my direction. Because of Mr. Nalepa's extensive background, experience and familiarity with SPS, Mr. Nalepa was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. Nalepa's and ReSolved Energy Consulting, LLC's time, effort and associated fees in *PUC Docket No. 48886* of \$2,592.00, *PUC Docket No. 48973* of \$39,978.00, and *PUC Docket No. 49831* of \$33,291.00 are reasonable and necessary.
23. Mark Garrett holds a bachelor's degree from the University of Oklahoma and completed his postgraduate hours at Stephen F. Austin State University and the University of Texas at Arlington and Pan American. Mr. M. Garrett also holds a juris doctorate degree from Oklahoma City University Law School and was admitted to the Oklahoma Bar in 1997.

Mr. M. Garrett is also a Certified Public Accountant licensed in the States of Texas and Oklahoma with a background in public accounting, private industry, and utility regulation. In public accounting, as a staff auditor for a firm in Dallas, he primarily audited financial institutions in the State of Texas. In private industry, as controller for a mid-sized corporation in Dallas, Mr. M. Garrett managed the company's accounting function, including general ledger, accounts payable, financial reporting, audits, tax returns, budgets, projections, and supervision of accounting personnel. In utility regulation, he served as an auditor in the Public Utility Division of the Oklahoma Corporation Commission ("OCC") from 1991 to 1995. In that position, he managed the audits of major gas and electric utility companies in Oklahoma.

Since leaving the OCC, he has worked on numerous rate cases and other regulatory proceedings on behalf of various consumers and consumer groups. He has provided both written and live oral testimony before public utility commissions in the states of Alaska, Arizona, Arkansas, Colorado, Massachusetts, Nevada, Oklahoma, Texas, and Utah. He has also provided written testimony in the state of Florida. His clients include large industrial customers, large gaming customers in Nevada, large hospitals and hospital groups, cities, universities, and large commercial customers. He has also testified on behalf of the commission staff in Utah and the offices of attorneys general in Oklahoma and Florida. He has also served as a presenter at the NARUC subcommittee on Accounting and Finance, on the issue of incentive compensation, and as a regular instructor at the New Mexico State University's Center for Public Utilities course on basic utility regulation.

24. Mr. M. Garrett's time and efforts in *PUC Docket No. 49831* were coordinated by me and by attorneys working under my direction. Because of Mr. M. Garrett's extensive background, experience and familiarity with SPS, Mr. M. Garrett was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. M. Garrett's and Garrett Group, LLC's time, effort and associated fees in *Docket No. 49831* of \$70,250.00 are reasonable and necessary. Mr. M. Garrett's resume is attached to his direct testimony in *PUC Docket No. 49831*.
25. Mr. Scott Norwood is the President of Norwood Energy Consulting, L.L.C. For over thirty years Mr. Norwood has participated in utility proceedings throughout the United States and specialized in areas of electric utility regulation, resource planning, and energy procurement. Mr. Norwood's time and efforts in *PUC Docket Nos. 48847, 48973, 49616 and 49831* were coordinated by me and by attorneys working under my direction. Because of Mr. Norwood's extensive background, experience and familiarity with SPS, Mr. Norwood was able to work very efficiently and accomplish his assignments with fewer hours than I would expect other consultants or expert witness would require. Mr. Norwood's time, effort and associated fees in *PUC Docket No. 48847* of \$24,530.00, *PUC Docket No. 48973* of \$38,280.00, *PUC Docket No. 49616* of \$23,540.00 and *PUC Docket No. 49831* of \$38,610.00 are reasonable and necessary. Mr. Norwood's resume is attached to his direct testimony in *PUC Docket No. 49831*.

26. J. Randall Woolridge, Ph.D. is the Professor of Finance and the Goldman, Sachs & Co. and Frank P. Smeal Endowed University Fellow in Business Administration at the University Park Campus of Pennsylvania State University. Dr. Woolridge is also the Director of the Smeal College Trading Room and President of the Nittany Lion Fund, LLC. Dr. Woolridge has extensive experience in evaluating market data to assist him in assessing a regulated entity's cost of capital and the effect changes in the capital markets has a utility's cost of capital. Dr. Woolridge's time, effort and associated fees in *PUC Docket No. 49831* of \$26,460.00 are reasonable and necessary. Mr. Woolridge's resume is attached to his direct testimony in *PUC Docket No. 49831*.
27. Michael L. Brosch is a principal in the firm, Utilitech, Inc., a consulting firm engaged primarily in utility rate and regulation work. Mr. Brosch has over 40 years of experience in utility regulatory work and has participated in dozens of electric and gas regulatory proceedings. His time and efforts in *PUC Docket No. 48498* were coordinated by me and by attorneys working under my direction. Because of his extensive background and experience, Mr. Brosch was able to work very efficiently and accomplish his assignment with fewer hours than I would expect other consultants or expert witness would require. Mr. Brosch and Utilitech, Inc.'s time, effort and associated fees in *PUC Docket No. 48498* of \$1,443.75 are reasonable and necessary.
28. Ms. Catherine J. Webking presents a review of the reasonableness of AXM's rate-case expenses. Ms. Webking's invoice through January 31, 2020 totals \$8,690.00. Ms. Webking is a licensed attorney in Texas whose practice encompasses advocacy in Texas regulatory matters, especially in the areas of public utility law involving electricity, telecommunications, water, and natural gas. Ms. Webking has a deep understanding of Texas' utility regulatory environment and is familiar with fees charged by attorneys and consultants that practice before the PUCT and the Railroad Commission of Texas. Ms. Webking obtained her B.S. in Chemical Engineering from Texas A&M University and her Juris Doctorate degree from the University of Texas School of Law in 1991 graduating with honors. Ms. Webking has extensive experience in practice before the PUCT and because of her experience was able to accomplish her tasks very efficiently and her billing rate and total fees are reasonable and necessary and consistent with the complexity of the issues she addressed in her testimony in *PUC Docket No. 49831*. Ms. Webking's resume and qualifications are attached to her direct testimony in *PUC Docket No. 49831*.
29. The invoices submitted by Herrera Law & Associates include a description of services performed and time expended on each activity. The City of Amarillo provides AXM's invoices for our firm's and consultant's services in *PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616 and 49831* to SPS approximately on a monthly basis. Herrera Law & Associates has documented all charges with time sheets, invoices and records. The documentation in this case is similar to that provided in many previous cases at the Commission and is in conformance with the Commission's "rate-case-expense" rule, 16 TEXAS ADMINISTRATIVE CODE § 25.245.
30. The legal expenses shown in our invoices connected with *PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616 and 49831* do not include luxury items. Legal expenses

consist of reimbursable items such as courier services, express mail, postage and shipping, and photocopying.

31. My responsibilities, as well as other attorneys assigned to *PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616 and 49831*, include client communication, strategy development, overall case management, discovery review, drafting pleadings and briefs, reviewing and editing testimony, and preparing for and attending pre-hearing conferences and hearings.
32. The other attorneys assigned to these proceedings are Mr. Brennan J. Foley, and Mr. Sergio E. Herrera.

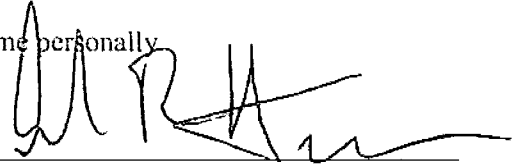
Mr. Foley has over 10 years of related utility experience, including employment in the PUCT's Legal Division. Mr. Foley's experience at the PUCT included the gamut of cases the PUCT handles, including rate cases, CCN cases, complaints, and rulemakings.

Mr. S. Herrera has been employed with our firm as a law clerk since 2015 and obtained a dual degree – JD/MBA from Texas Tech School of Law and the Rawls College of Business in which he graduated Magna Cum Laude. Mr. S. Herrera, though recently licensed in 2018, has over five years of experience in assisting and providing support in numerous rate proceedings at the PUCT and the Railroad Commission of Texas, and “CCN” cases at the PUCT, primarily in undertaking legal research, preparing discovery and pleadings related to discovery disputes, reviewing pre-filed testimonies, and drafting of briefs in matters before the PUCT and the courts of appeal.

33. Ms. Mariann Wood is a certified paralegal having obtained her Associates of Applied Science in Paralegal Studies degree and certification from Kaplan University. Ms. Wood has over 15 years of experience as a paralegal and legal assistant, all in Administrative Law and more particularly in the public utility sector.
34. Ms. Leslie Lindsey is a certified paralegal having obtained a BA from Huston-Tillotson University and her certification from the University of Texas. Ms. Lindsey has over 8 years of experience as a paralegal and legal assistant, all in Administrative Law and all in the public utility sector.
35. Because the Public Utility Commission has not issued a final order in *PUC Docket Nos. 49616 and 49831* I anticipate AXM will incur additional rate-case expenses. Thus, I will supplement this affidavit with additional information as appropriate.
36. The total of AXM's actual rate case expenses through January 31, 2020 for *PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616 and 49831* are \$750,650.04 including expenses from retained consultants. These amounts are reasonable given the complexity, importance and scope of these proceedings, the nature of AXM's participation, and the number of issues involved. An Excel spreadsheet summary of all rate case expenses is provided as Exhibit A.

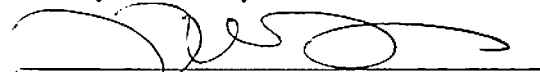
37. On behalf of AXM, our firm reserves the right to amend this affidavit and AXM's request for reimbursement as more information is gathered over the course of *PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616 and 49831.*

38. Statements in this affidavit are true and known by me personally

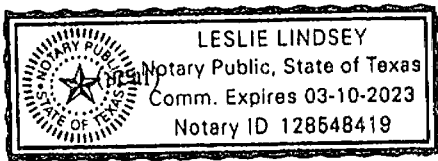


Alfred R. Herrera

SWORN AND SUBSCRIBED before me on this the 7th day of February 2020.



Notary Public, State of Texas



**SOAH DOCKET NO. 473-19-6677
PUC DOCKET NO. 49831**

**AXM Rate Case Expenses Related to
PUC Docket Nos. 47857, 48498, 48847, 48886, 48973, 49616, 49831
February 10, 2020**

EXHIBIT A
AXM's Rate Case Expense Summary for PUC Docket No. 47857

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Herrera Law & Associates, PLLC	2/8/2018		1/1/2018	1/31/2018	\$1,840.00	\$25.00	\$1,865.00	\$1,865.00	
	3/12/2018		2/1/2018	2/28/2018	\$4,818.50	\$0.00	\$4,818.50	\$6,683.50	
	4/9/2018		3/1/2018	3/31/2018	\$122.00	\$0.00	\$122.00	\$6,805.50	
	5/11/2018		4/1/2018	4/30/2018	\$42.00	\$0.00	\$42.00	\$6,847.50	
	7/9/2018		6/1/2018	6/30/2018	\$61.00	\$0.00	\$61.00	\$6,908.50	
							Herrera Law & Associates, PLLC Total	\$6,908.50	
Legal and Consultants	2/8/2018		1/1/2018	1/31/2018	\$1,840.00	\$25.00	\$1,865.00	\$1,865.00	
	3/12/2018		2/1/2018	2/28/2018	\$4,818.50	\$0.00	\$4,818.50	\$6,683.50	
	4/9/2018		3/1/2018	3/31/2018	\$122.00	\$0.00	\$122.00	\$6,805.50	
	5/11/2018		4/1/2018	4/30/2018	\$42.00	\$0.00	\$42.00	\$6,847.50	
	7/9/2018		6/1/2018	6/30/2018	\$61.00	\$0.00	\$61.00	\$6,908.50	
							Legal and Consultants	\$6,908.50	
							Total Legal and Consultants	\$6,908.50	
							Total Billings for Services Thru 1/31/20	\$6,908.50	

EXHIBIT A
AXM's Rate Case Expense Summary for PUC Docket No. 48498

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Utilitech, Inc	9/5/2018		8/1/2018	8/31/2018	\$1,443.75		\$1,443.75	\$1,443.75	
								Utilitech, Inc. Total	\$1,443.75
Herrera Law & Associates, PLLC	9/11/2018		8/1/2018	8/31/2018	\$2,206.50	\$56.30	\$2,262.80	\$2,262.80	
	3/8/2019		2/1/2019	2/28/2019	\$167.50	\$0.00	\$167.50	\$2,430.30	
	4/3/2019		3/1/2019	3/31/2019	\$149.00	\$0.00	\$149.00	\$2,579.30	
							Herrera Law & Associates, PLLC Total		\$2,579.30
Legal and Consultants	9/11/2018		8/1/2018	8/31/2018	\$2,206.50	\$1,500.05	\$3,706.55	\$3,706.55	
	3/8/2019		2/1/2019	2/28/2019	\$167.50	\$0.00	\$167.50	\$3,874.05	
	4/3/2019		3/1/2019	3/31/2019	\$149.00	\$0.00	\$149.00	\$4,023.05	
							Legal and Consultants		\$4,023.05
							Total Legal and Consultants		\$4,023.05
							Total Billings for Services Thru 1/31/20		\$4,023.05

EXHIBIT A

AXM's Rate Case Expense Summary for PUC Docket No. 48847

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Norwood Energy	2/4/2019	SPSRuelFac1118	11/1/2018	11/30/2018	\$7,150.00		\$7,150.00	\$7,150.00	
	2/4/2019	SPSRuelFac1218	12/1/2018	12/31/2018	\$5,940.00		\$5,940.00	\$13,090.00	
	2/4/2019	SPSRuelFac0119	1/1/2019	1/31/2019	\$8,910.00		\$8,910.00	\$22,000.00	
	3/4/2019	SPSRuelFac1018	2/1/2019	2/28/2019	\$2,530.00		\$2,530.00	\$24,530.00	
							Norwood Energy Total		\$24,530.00
Herrera Law & Associates, PLLC	12/6/2018		11/1/2018	11/30/2018	\$7,712.50	\$153.45	\$7,865.95	\$7,865.95	
	1/9/2019		12/1/2018	12/31/2018	\$1,793.00	\$19.00	\$1,812.00	\$9,677.95	
	2/7/2019		1/1/2019	1/31/2019	\$5,146.00	\$423.71	\$5,569.71	\$15,247.66	
	3/8/2019		2/1/2019	2/28/2019	\$6,766.50	\$50.80	\$6,817.30	\$22,064.96	
	4/3/2019		3/1/2019	3/31/2019	\$859.00	\$0.00	\$859.00	\$22,923.96	
	5/6/2019		4/1/2019	4/30/2019	\$97.50	\$0.00	\$97.50	\$23,021.46	
	6/6/2019		5/1/2019	5/31/2019	\$357.50	\$0.00	\$357.50	\$23,378.96	
	8/7/2019		7/1/2019	7/31/2019	\$97.50	\$0.00	\$97.50	\$23,476.46	
	9/10/2019		8/1/2019	8/31/2019	\$964.00	\$10.00	\$974.00	\$24,450.46	
	10/3/2019		9/1/2019	9/30/2019	\$60.50		\$60.50	\$24,510.96	
							Herrera Law & Associates, PLLC Total		\$24,510.96
Legal and Consultants	12/6/2018		11/1/2018	11/30/2018	\$7,712.50	\$153.45	\$7,865.95	\$7,865.95	
	1/9/2019		12/1/2018	12/31/2018	\$1,793.00	\$19.00	\$1,812.00	\$9,677.95	
	2/7/2019		1/1/2019	1/31/2019	\$5,146.00	\$423.71	\$5,569.71	\$15,247.66	
	3/8/2019		2/1/2019	2/28/2019	\$6,766.50	\$2,580.80	\$9,347.30	\$24,594.96	
	4/3/2019		3/1/2019	3/31/2019	\$859.00	\$0.00	\$859.00	\$25,453.96	
	5/6/2019		4/1/2019	4/30/2019	\$97.50	\$0.00	\$22,097.50	\$47,551.46	
	6/6/2019		5/1/2019	5/31/2019	\$357.50	\$0.00	\$357.50	\$47,908.96	
	8/7/2019		7/1/2019	7/31/2019	\$97.50	\$0.00	\$97.50	\$48,006.46	
	9/10/2019		8/1/2019	8/31/2019	\$964.00	\$0.00	\$974.00	\$48,980.46	
	10/3/2019		9/1/2019	9/30/2019	\$60.50		\$60.50	\$49,040.96	
							Legal and Consultants		\$49,040.96
							Total Legal and Consultants		\$49,040.96
							Total Billings for Services Thru 1/31/20		\$49,040.96

EXHIBIT A

AXM's Rate Case Expense Summary for PUC Docket No. 48886

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
ReSolved Energy Consulting	3/6/2019	4345	2/1/2019	2/28/2019	\$2,592.00		\$2,592.00	\$2,592.00	
							ReSolved Energy Total		\$2,592.00
Herrera Law & Associates, PLLC	12/6/2018		11/1/2018	11/30/2018	\$1,007.00	\$22.95	\$1,029.95	\$1,029.95	
	1/9/2019		12/1/2018	12/31/2018	\$585.00	\$0.00	\$585.00	\$1,614.95	
	2/7/2019		1/1/2019	1/31/2019	\$1,092.50	\$525.75	\$1,618.25	\$3,233.20	
	3/8/2019		2/1/2019	2/28/2019	\$1,395.50	\$2.00	\$1,397.50	\$4,630.70	
	4/3/2019		3/1/2019	3/31/2019	\$14.00	\$0.00	\$14.00	\$4,644.70	
	5/6/2019		4/1/2019	4/30/2019	\$46.50	\$0.00	\$46.50	\$4,691.20	
	6/6/2019		5/1/2019	5/31/2019	\$79.00	\$0.00	\$79.00	\$4,770.20	
	7/12/2019		6/1/2019	6/30/2019	\$14.00	\$0.00	\$14.00	\$4,784.20	
							Herrera Law & Associates, PLLC Total		\$4,784.20
Legal and Consultants	12/6/2018		11/1/2018	11/30/2018	\$1,007.00	\$22.95	\$1,029.95	\$1,029.95	
	1/9/2019		12/1/2018	12/31/2018	\$585.00	\$0.00	\$585.00	\$1,614.95	
	2/7/2019		1/1/2019	1/31/2019	\$1,092.50	\$525.75	\$1,618.25	\$3,233.20	
	3/8/2019		2/1/2019	2/28/2019	\$1,395.50	\$2,594.00	\$3,989.50	\$7,222.70	
	4/3/2019		3/1/2019	3/31/2019	\$14.00	\$0.00	\$14.00	\$7,236.70	
	5/6/2019		4/1/2019	4/30/2019	\$46.50	\$0.00	\$46.50	\$7,283.20	
	6/6/2019		5/1/2019	5/31/2019	\$79.00	\$0.00	\$79.00	\$7,362.20	
	7/12/2019		6/1/2019	6/30/2019	\$14.00	\$0.00	\$14.00	\$7,376.20	
							Legal and Consultants		\$7,376.20
							Total Legal and Consultants		\$7,376.20
							Total Billings for Services Thru 1/31/20		\$7,376.20

EXHIBIT A

AXM's Rate Case Expense Summary for PUC Docket No. 48973

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Norwood Energy	3/4/2019	SPSFuelRec2019	2/1/2019	2/28/2019	\$3,960.00		\$3,960.00	\$3,960.00	
	4/5/2019	SPSFuelRec0319	3/1/2019	3/31/2019	\$2,640.00		\$2,640.00	\$6,600.00	
	5/2/2019	SPSFuelRec0419	4/1/2019	4/30/2019	\$6,270.00		\$6,270.00	\$12,870.00	
	7/3/2019	SPSFuelRec0519	5/1/2019	5/31/2019	\$10,010.00		\$10,010.00	\$22,880.00	
	7/3/2019	SPSFuelRec0619	6/1/2019	6/30/2019	\$5,280.00		\$5,280.00	\$28,160.00	
	8/7/2019	SPSFuelRec0719	7/1/2019	7/31/2019	\$7,480.00		\$7,480.00	\$35,640.00	
		SPSFuelRec0819	8/1/2019	8/31/2019	\$1,210.00		\$1,210.00	\$36,850.00	
	11/16/2019	SPSFuelRec1019	10/1/2019	10/31/2019	\$1,430.00		\$1,430.00	\$38,280.00	
							Norwood Energy Total		\$38,280.00
ReSolved Energy Consulting	2/7/2019	4337	1/1/2019	1/31/2019	\$3,780.00		\$3,780.00	\$3,780.00	
	3/6/2019	4344	2/1/2019	2/28/2019	\$1,026.00		\$1,026.00	\$4,806.00	
	4/2/2019	4365	3/1/2019	3/31/2019	\$4,158.00		\$4,158.00	\$8,964.00	
	5/2/2019	4376	4/1/2019	4/30/2019	\$5,850.00		\$5,850.00	\$14,814.00	
	6/5/2019	4396	5/1/2019	5/31/2019	\$11,610.00		\$11,610.00	\$26,424.00	
	7/1/2019	4410	6/1/2019	6/30/2019	\$3,726.00		\$3,726.00	\$30,150.00	
	8/5/2019	4432	7/1/2019	7/31/2019	\$4,536.00		\$4,536.00	\$34,686.00	
	9/4/2019	4453	8/1/2019	8/31/2019	\$2,646.00		\$2,646.00	\$37,332.00	
	11/7/2019	4497	9/1/2019	10/31/2019	\$540.00		\$540.00	\$37,872.00	
	12/4/2019	4508	11/1/2019	11/30/2019	\$1,566.00		\$1,566.00	\$39,438.00	
	2/5/2020	4549	12/1/2019	1/31/2020	\$540.00		\$540.00	\$39,978.00	
							ReSolved Energy Total		\$39,978.00
Herrera Law & Associates, PLLC	1/9/2019		12/1/2018	12/31/2018	\$6,052.00	\$151.65	\$6,203.65	\$6,203.65	
	2/7/2019		12/18/2018	1/31/2019	\$9,303.50	\$53.65	\$9,357.15	\$15,560.80	
	3/8/2019		2/1/2019	2/28/2019	\$3,360.00	\$0.00	\$3,360.00	\$18,920.80	
	4/3/2019		3/1/2019	3/31/2019	\$3,960.00	\$0.00	\$3,960.00	\$22,880.80	
	5/6/2019		4/1/2019	4/30/2019	\$5,230.50	\$119.20	\$5,349.70	\$28,230.50	
	6/6/2019		5/1/2019	5/31/2019	\$15,282.50	\$2,251.22	\$17,533.72	\$45,764.22	
	7/12/2019		6/1/2019	6/30/2019	\$13,334.00	\$669.05	\$14,003.05	\$59,767.27	
	8/7/2019		7/1/2019	7/31/2019	\$49,734.50	\$958.48	\$50,692.98	\$110,460.25	
	9/10/2019		8/1/2019	8/31/2019	\$22,463.00	\$3,517.45	\$25,980.45	\$136,440.70	
	10/3/2019		9/1/2019	9/30/2019	\$4,573.00	\$55.00	\$4,628.00	\$141,068.70	
	11/13/2019		10/1/2019	10/31/2019	\$10,042.00	\$0.00	\$10,042.00	\$151,110.70	
	12/6/2019		11/1/2019	11/30/2019	\$13,804.00	\$144.75	\$13,948.75	\$165,059.45	
	1/13/2020		12/1/2019	12/31/2019	\$3,217.00	\$0.00	\$3,217.00	\$168,276.45	
	2/5/2020		1/1/2020	1/31/2020	\$11,491.00	\$829.00	\$12,320.00	\$180,596.45	
							Herrera Law & Associates, PLLC Total		\$180,596.45
Legal and Consultants	1/9/2019		12/1/2018	12/31/2018	\$6,052.00	\$151.65	\$6,203.65	\$6,203.65	
	2/7/2019		12/18/2018	1/31/2019	\$9,303.50	\$3,833.65	\$13,137.15	\$19,340.80	
	3/8/2019		2/1/2019	2/28/2019	\$3,360.00	\$4,986.00	\$8,346.00	\$27,686.80	
	4/3/2019		3/1/2019	3/31/2019	\$3,960.00	\$6,798.00	\$10,758.00	\$38,444.80	
	5/6/2019		4/1/2019	4/30/2019	\$5,230.50	\$12,239.20	\$17,469.70	\$55,914.50	
	6/6/2019		5/1/2019	5/31/2019	\$15,282.50	\$13,861.22	\$29,143.72	\$85,058.22	
	7/12/2019		6/1/2019	6/30/2019	\$13,334.00	\$19,685.05	\$33,019.05	\$118,077.27	
	8/7/2019		7/1/2019	7/31/2019	\$49,734.50	\$12,974.48	\$62,708.98	\$180,786.25	
	9/10/2019		8/1/2019	8/31/2019	\$22,463.00	\$6,163.45	\$28,626.45	\$209,412.70	
	10/3/2019		9/1/2019	9/30/2019	\$4,573.00	\$1,265.00	\$5,838.00	\$215,250.70	
	11/13/2019		10/1/2019	10/31/2019	\$10,042.00	\$540.00	\$10,582.00	\$225,832.70	
	12/6/2019		11/1/2019	11/30/2019	\$13,804.00	\$3,140.75	\$16,944.75	\$242,777.45	
	1/13/2020		12/1/2019	12/31/2019	\$3,217.00	\$0.00	\$3,217.00	\$245,994.45	
	2/5/2020		1/1/2020	1/31/2020	\$11,491.00	\$1,369.00	\$12,860.00	\$258,854.45	
							Legal and Consultants		\$258,854.45

EXHIBIT A
AXM's Rate Case Expense Summary for PUC Docket No. 48973

							Total Legal and Consultants	\$258,854.45
							Total Billings for Services Thru 1/31/20	\$258,854.45

EXHIBIT A

AXM's Rate Case Expense Summary for PUC Docket No. 49616

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date	
Norwood Energy	7/3/2019	SPSFuelFac0619	6/1/2019	6/30/2019	\$1,760.00		\$1,760.00	\$1,760.00	
	8/7/2019	SPSFuelFac0719	7/1/2019	7/31/2019	\$4,180.00		\$4,180.00	\$5,940.00	
	10/6/2019	SPSFuelFac0819	8/1/2019	8/31/2019	\$5,500.00		\$5,500.00	\$11,440.00	
	10/6/2019	SPSFuelFac0912	9/1/2019	9/30/2019	\$8,470.00		\$8,470.00	\$19,910.00	
	11/16/2019	SPSFuelFac1012	10/1/2019	10/31/2019	\$3,630.00		\$3,630.00	\$23,540.00	
								Norwood Energy Total	\$23,540.00
Herrera Law & Associates, PLLC	7/12/2019		6/1/2019	6/30/2019	\$2,323.50	\$56.70	\$2,380.20	\$2,380.20	
	8/7/2019		7/1/2019	7/31/2019	\$7,097.00	\$72.20	\$7,169.20	\$9,549.40	
	9/10/2019		8/1/2019	8/31/2019	\$1,979.00	\$15.00	\$1,994.00	\$11,543.40	
	10/3/2019		9/1/2019	9/30/2019	\$7,279.00	\$450.52	\$7,729.52	\$19,272.92	
	11/13/2019		10/1/2019	10/31/2019	\$15,772.50	\$598.10	\$16,370.26	\$35,643.18	
	12/6/2019		11/1/2019	11/30/2019	\$1,049.50	\$1.00	\$1,050.50	\$36,693.68	
	1/13/2020		12/1/2019	12/31/2019	\$970.50	\$0.00	\$970.50	\$37,664.18	
	2/5/2020		1/1/2020	1/31/2020	\$595.00	\$0.00	\$595.00	\$38,259.18	
								Herrera Law & Associates, PLLC Total	\$38,259.18
Legal and Consultants	7/12/2019		6/1/2019	6/30/2019	\$2,323.50	\$1,816.70	\$4,140.20	\$4,140.20	
	8/7/2019		7/1/2019	7/31/2019	\$7,097.00	\$4,252.20	\$11,349.20	\$15,489.40	
	9/10/2019		8/1/2019	8/31/2019	\$1,979.00	\$15.00	\$1,994.00	\$17,483.40	
	10/3/2019		9/1/2019	9/30/2019	\$7,279.00	\$14,420.52	\$21,699.52	\$39,182.92	
	11/13/2019		10/1/2019	10/31/2019	\$15,772.50	\$598.10	\$16,370.26	\$55,553.18	
	12/6/2019		11/1/2019	11/30/2019	\$1,049.50	\$3,631.00	\$4,680.50	\$60,233.68	
	1/13/2020		12/1/2019	12/31/2019	\$970.50	\$0.00	\$970.50	\$61,204.18	
	2/5/2020		1/1/2020	1/31/2020	\$595.00	\$0.00	\$595.00	\$61,799.18	
								Legal and Consultants	\$61,799.18
								Total Legal and Consultants	\$61,799.18
								Total Billings for Services Thru 1/31/20	\$61,799.18

EXHIBIT A

AXM's Rate Case Expense Summary for PUC Docket No. 49831

	Invoice Date	Invoice No.	Billing Period	Through Period	Hourly Fees	Expense	Invoice Amount	Total Billed to Date
Resolved Energy Consulting	9/4/2019	4452	8/1/2019	8/31/2019	\$5,202.00		\$5,202.00	\$5,202.00
	10/3/2019	4476	9/1/2019	9/30/2019	\$8,640.00		\$8,640.00	\$13,842.00
	11/13/2019	4496	10/1/2019	10/31/2019	\$5,022.00		\$5,022.00	\$18,864.00
	12/4/2019	4507	11/1/2019	11/30/2019	\$2,241.00		\$2,241.00	\$21,105.00
	1/7/2020	4531	12/1/2019	12/31/2019	\$3,780.00		\$3,780.00	\$24,885.00
Norwood Energy Consulting	2/3/2020	4543	1/1/2020	1/31/2020	\$8,406.00		\$8,406.00	\$33,291.00
Norwood Energy Consulting	10/6/2019	SPSRate Aug19	8/1/2019	8/31/2019	\$4,510.00		\$4,510.00	\$4,510.00
	10/6/2019	SPSRate Sep19	9/1/2019	9/30/2019	\$4,620.00		\$4,620.00	\$9,130.00
	11/16/2019	SPSRate Oct19	10/1/2019	10/31/2019	\$5,940.00		\$5,940.00	\$15,070.00
	12/3/2019	SPSRate Nov19	11/1/2019	11/30/2019	\$5,280.00		\$5,280.00	\$20,350.00
	1/9/2020	SPSRate Dec19	12/1/2019	12/31/2019	\$6,160.00		\$6,160.00	\$26,510.00
Resolve Utility Consulting	2/4/2020	Jan20	1/1/2020	1/31/2020	\$12,100.00		\$12,100.00	\$38,610.00
Garrett Group Consulting, Inc.	11/20/2019	8/1/2019	10/31/2019	\$18,650.00	\$18,650.00		\$18,650.00	\$18,650.00
	12/4/2019	11/1/2019	11/30/2019	\$11,150.00	\$11,150.00		\$11,150.00	\$29,800.00
	1/14/2020	12/1/2019	12/31/2019	\$11,150.00	\$11,150.00		\$11,150.00	\$40,950.00
	2/7/2020	1/1/2020	1/31/2020	\$29,300.00	\$29,300.00		\$29,300.00	\$70,250.00
J. Randall Woolridge	2/5/2020	8/1/2019	1/31/2020	\$26,460.00	\$26,460.00		\$26,460.00	\$26,460.00
Scott Douglas & McConnico, LLP	2/6/2020	12/16/2019	1/31/2020	\$8,690.00	\$8,690.00		\$8,690.00	\$8,690.00
Herrera Law & Associates, PLLC	9/10/2019	8/1/2019	8/31/2019	\$30,733.50	\$340.95		\$31,074.45	\$31,074.45
	10/3/2019	9/1/2019	9/30/2019	\$50,471.50	\$224.90		\$50,696.40	\$81,770.85
	11/13/2019	10/1/2019	10/31/2019	\$8,486.00	\$129.35		\$8,615.35	\$90,386.20
	12/6/2019	11/1/2019	11/30/2019	\$18,815.50	\$88.15		\$18,903.65	\$109,289.85
	1/13/2020	12/1/2019	12/31/2019	\$14,939.50	\$547.45		\$15,486.95	\$124,776.80
Legal and Consultants	2/5/2020	1/1/2020	1/31/2020	\$17,929.50	\$140.40		\$18,069.90	\$142,846.70
Total Legal and Consultants								
Total Billings for Services Thru 1/31/20								