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Received - 2022-02-28 02:18:53 PM
Control Number - 52485
ItemNumber - 123

SOAH DOCKET NO. 473-22-1073
PUC DOCKET NO. 52485

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
PUBLIC SERVICE COMPANY TO	§	
AMEND ITS CERTIFICATE OF	§	OF
CONVENIENCE AND NECESSITY TO	§	
CONVERT HARRINGTON	§	ADMINISTRATIVE HEARINGS
GENERATING STATION FROM	§	
COAL TO NATURAL GAS	§	

COMMISSION STAFF'S NINTH REQUEST FOR INFORMATION
TO SOUTHWESTERN PUBLIC SERVICE COMPANY
QUESTION NOS. STAFF 9-1 THROUGH 9-8

Pursuant to 16 Texas Administrative Code (TAC) § 22.144 of the Commission's Procedural Rules, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Public Service Company by and through their attorney of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

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

Dated: February 28, 2022

Respectfully submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Rachelle Nicolette Robles
Division Director

Sneha Patel
Managing Attorney

/s/ Mildred Anaele

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CERTIFICATE OF SERVICE

I certify that, unless otherwise ordered by the presiding officer, notice of the filing of this document was provided to all parties of record via electronic mail on February 28, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

/s/ Mildred Anaele

Mildred Anaele

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DEFINITIONS

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

- 2) "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information, or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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INSTRUCTIONS

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

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- Staff 9-1 Concerning Preliminary Order question [8], what were the principal concerns expressed in the questionnaire responses received at or after any public meetings held by SPS regarding the proposed generating facilities? Please provide copies of the questionnaire responses.
- Staff 9-2 Concerning Preliminary Order question [13e], were the environmental compliance costs associated with alternatives adequately considered compared to the environmental compliance costs associated with the proposed conversion of the Harrington station? Please provide a comprehensive explanation, including supporting documentation.
- Staff 9-3 Concerning Preliminary Order question [15], did SPS adequately consider alternative sources of natural gas and alternative locations for interconnections with existing pipelines? Please provide a comprehensive explanation, including supporting documentation.
- Staff 9-4 Concerning Preliminary Order question [16], did SPS adequately consider entering into firm fuel supply or firm transportation contracts as an alternative to constructing a new natural gas pipeline? Please provide supporting documentation and any correspondence with suppliers.
- Staff 9-5 Concerning Preliminary Order question [18a], what are the potential economic or reliability benefits associated with dual-fuel and fuel-storage capabilities? Please provide a comprehensive explanation.
- Staff 9-6 Concerning Preliminary Order question [18c], does SPS's analysis of the lowering of cost of service, if any, sufficiently account for the effects of any recent escalation in commodity costs? Please provide a comprehensive explanation, including any studies and supporting documentation.
- Staff 9-7 Concerning Preliminary Order question [20], will the proposed conversion of the Harrington station change SPS's plans for retiring or modifying any other generation facilities in a manner that affects environmental integrity? Please provide a comprehensive explanation.
- Staff 9-8 Concerning Preliminary Order question [31], what is the effect on reliability in the Southwest Power Pool transmission system or the costs of that entity to operate its system if the proposed CCN amendment is approved? Please provide a comprehensive explanation, including supporting documentation.