



## Filing Receipt

**Received - 2022-03-01 12:00:30 PM**  
**Control Number - 52485**  
**ItemNumber - 124**

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

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

**ALLIANCE OF XCEL MUNICIPALITIES’  
FOURTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN PUBLIC SERVICE COMPANY**

Alliance of Xcel Municipalities’ (“AXM”) Fourth Set of Requests for Information ("RFIs") to Southwestern Public Service Company (“SPS”) is hereby filed in this docket. Responses to the RFIs set forth on Exhibit A should be served on Alfred R. Herrera, Herrera Law & Associates, PLLC at 4400 Medical Parkway, Austin, Texas 78756, within twenty (20) days of service hereof or no later than **March 21, 2022**. Exhibit A is attached hereto and incorporated herein for all purposes.

**Definitions**

1. “SPS,” the “Company,” and “Applicant” refer to Southwestern Public Service Company and its affiliates.
2. “You,” “yours,” and “your” refer to SPS (as defined above), including its directors, officers, employees, consultants, agents and attorneys.
3. “Document” and “documents” mean any written, recorded, filmed, or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device of any other media, including, but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contracts, agreements, books, pamphlets, periodicals, appointment calendars, records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recording that is capable of being transcribed into written form.

4. The term “communication” includes all verbal and written communications (including written records of verbal communications) of every kind, including but not limited to, telephone calls, conferences, letters and all memoranda or other documents concerning the requested item. Where communications are not in writing, provide copies of all memoranda and documents and describe in full the substance of the communication to the extent that substance is not reflected in the memoranda and documents provided and to the extent it is within the knowledge of SPS.
5. “Identification” of a document includes stating (a) the nature of the document (e.g., letter, memorandum, corporate minutes), (b) the date, if any, appearing thereon, (c) the date, if known, on which the document was prepared, (d) the title of the document, (e) the general subject matter of the document, (f) the number of pages comprising the document, (g) the identity of each person who signed or initialed the document, (h) the identity of each person to whom the document was addressed, (i) the identity of each person who received the document or reviewed it, (j) the location of the document, and (k) the identity of each person having custody of, or control over, the document. Identification of a document includes identifying all documents known or believed to exist, whether or not in the custody of SPS or in the custody of its attorneys or other representatives or agents.
6. “Identification” of a person includes stating his or her full name, his or her most recent known business address and telephone number, his or her present position, and his or her prior connection or association with any party to this proceeding.
7. “Person” refers to, without limiting the generality of its meaning, every natural person, corporate entity, partnership, association (whether formally organized or ad hoc), joint venture, unit operation, cooperative, municipality, commission, governmental body or agency.
8. Capitalized terms not otherwise defined herein shall have the meaning attributed to them in the referenced testimony.

### **Instructions**

1. If any RFI appears confusing, please request clarification from the undersigned counsel.
2. In providing your responses, please start each response on a separate page and type, at the top of the page, the RFI that is being answered.
3. As part of the response to each RFI, please state, at the bottom of the answer, the name and job position of each person who participated in any way, other than providing clerical assistance, in the preparing of the answer. If the RFI has sub-parts, please identify the person or persons by sub-part. Please also state the name of the witness in this docket who will sponsor the

answer to the RFI and who can vouch for the truth of the answer. If the RFI has sub-parts, please identify the witness or witnesses by sub-part.

4. Rather than waiting to provide all of the responses at the same time, please provide individual responses as each becomes available.
5. If SPS considers any RFI to be unduly burdensome, or if the response would require the production of a voluminous amount of material, please call the undersigned counsel as soon as possible in order to discuss the situation and to try to resolve the problem. Likewise, if SPS objects to any of the RFIs on the grounds that the RFI seeks proprietary information, or on any other grounds, please call the undersigned counsel as soon as possible.
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, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.
7. These requests shall be deemed continuing so as to require further and supplemental responses if SPS receives or generates additional information within the scope of these requests between the time of the original response and the time of the hearings.

Respectfully submitted,

**HERRERA LAW & ASSOCIATES, PLLC**

PO Box 302799  
Austin, TX 78703  
4400 Medical Pkwy  
Austin, Texas 78756  
(512) 474-1492 (voice)  
(512) 474-2507 (fax)

By: /s/ Alfred R. Herrera

Alfred R. Herrera  
State Bar No. 09529600  
aherrera@herreralawpllc.com

Sergio E. Herrera  
sherrera@herreralawpllc.com  
State Bar No. 24109999

service@herreralawpllc.com

**ATTORNEYS FOR ALLIANCE OF XCEL  
MUNICIPALITIES**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 1st day of March, 2022, a true and correct copy of the *Alliance of Xcel Municipalities' Fourth Set of RFIs to SPS* was served upon all parties of record via electronic mail, in accordance with the Order Suspending Rules, issued in Project No. 50664.

By: /s/ Leslie Lindsey  
Leslie Lindsey

**EXHIBIT A**

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

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

**ALLIANCE OF XCEL MUNICIPALITIES’  
FOURTH SET OF REQUESTS FOR INFORMATION TO  
SOUTHWESTERN PUBLIC SERVICE COMPANY**

- 4-1. Please provide SPS’s two most recent integrated resource plans filed with the New Mexico Public Regulation Commission along with supporting appendices.
- 4-2. Please explain why carbon taxes were not evaluated in the 2021 cost/benefit analyses of Harrington conversion or other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey.
- 4-3. Please explain whether carbon taxes were evaluated in assessing costs and benefits of resource planning portfolios in SPS’s most two recent integrated resource plans filed with the New Mexico Public Regulation Commission. If not, explain why not. If so, provide the carbon price forecast (\$/ton) used in each IRP.
- 4-4. Please provide the forecasted wind production tax credits (\$ per year) for each year of each of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey.
- 4-5. Please provide the forecasted investment tax credits (\$ per year) associated with new solar resources for each year of each of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey.
- 4-6. Please provide the forecasted interconnection costs (\$ per year) for new generation resources for each year of each of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey.
- 4-7. Please provide the forecasted total starts, net generation (MWh) and net capacity factors for each of the converted Harrington units for each year of each of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey that assume the units will be converted to burn gas rather than be retired.

- 4-8. Reference the modeling output data provided in response to Sierra Club 1-3(i), please explain why the converted Harrington gas units are not forecasted to start or produce energy in many years of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey.
- 4-9. Reference the response to AXM 2-12, please provide the SPP market energy price curves used for each of the 2021 cost/benefit analyses cases discussed in the direct testimony of SPS witness Elsey.
- 4-10. Reference the response to AXM 2-14, please provide the analyses of actual generation to predicted generation used to confirm the reasonableness of the Encompass model forecast accuracy.
- 4-11. Please provide the basis for the base case, high case and low case forecasted interconnection costs for new resources used in the 2021 cost/benefit analyses of Harrington conversion and other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey.
- 4-12. Please explain whether new gas-fired combustion turbine units could be located at the Harrington plant site to avoid incurring additional interconnection costs and whether this option was evaluated. If not, explain why not.
- 4-13. Please explain whether new solar or wind energy resources could be located at the Harrington plant site to avoid incurring additional interconnection costs and whether this option was evaluated. If not, explain why not.
- 4-14. Please provide the levels of ITCs and PTCs that are assumed to be available for new solar and wind resources for each year of each of the 2021 cost/benefit analyses of Harrington conversion and other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey, and the basis for these assumptions.
- 4-15. Please provide the cumulative NPV of ITCs associated with new solar resources for each of the 2021 cost/benefit analyses of Harrington conversion and other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey, along with workpapers supporting the calculated NPV amounts for each case.
- 4-16. Please provide the cumulative NPV of PTCs associated with new wind resources for each of the 2021 cost/benefit analyses of Harrington conversion and other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey, along with workpapers supporting the calculated NPV amounts for each case.
- 4-17. Please provide the cumulative NPV of forecasted interconnection costs for new resources for each of the 2021 cost/benefit analyses of Harrington conversion and other alternative cases evaluated as discussed in the direct testimony of SPS witness Elsey.
- 4-18. Please explain how the market price energy forecast curve used for the 2021 cost/benefit analyses discussed in witness Elsey's direct testimony was determined to be reasonable if

the Encompass modeling does not evaluate the actual forecasted levels and types of generating resources in the SPP market.

- 4-19. Please indicate whether the 2021 cost/benefit analyses discussed in witness Elsey's direct testimony include the forecasted value of excess capacity that is expected to exist on SPS's system in each case evaluated. If not, explain why not. If so, provide the cumulative NPV of capacity value for each case evaluated, and the forecasted annual capacity prices (\$/kW-year) included in each analysis.
- 4-20. Please provide the forecasted price of purchased capacity (\$/kW-year) for each year of the Company's most recent New Mexico IRP.
- 4-21. Please provide the current forecast of Tolk retirement dates and any regulatory orders addressing Tolk retirement dates in the Company's New Mexico jurisdiction.