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

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

**SOUTHWESTERN PUBLIC SERVICE COMPANY’S
RESPONSE TO COMMISSION STAFF’S
EIGHTH REQUEST FOR INFORMATION
QUESTIONS NO. 8-1 THROUGH 8-3**
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Southwestern Public Service Company ("SPS") files this response to the Public Utility Commission of Texas Staff's ("Staff") Eighth Request for Information, Question No. 8-1 through 8-3. SPS has provided notice, by email, to all parties that SPS's Responses to Staff's Eighth Request for Information and accompanying exhibits (excluding voluminous and exhibits provided pursuant to the protective order) have been filed with the Commission and are available for download from the Commission's Interchange website.

I. WRITTEN RESPONSES

SPS's written responses to Staff's Eighth Request for Information are attached and incorporated by reference. Each response is stated on or attached to a separate page on which the request has been restated. SPS's responses are made in the spirit of cooperation without waiving SPS's right to contest the admissibility of any of these matters at hearing. In accordance with 16 Tex. Admin. Code § 22.144(c)(2)(A) ("TAC"), each response lists the preparer or person under whose direct supervision the response was prepared and any sponsoring witness. When SPS provides certain information sought by the request while objecting to the provision of other information, it

does so without prejudice to its objection in the interests of narrowing discovery disputes under 16 TAC § 22.144(d)(5). Pursuant to 16 TAC § 22.144(c)(2)(F), SPS stipulates that its responses may be treated by all parties as if they were made under oath.

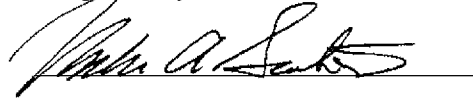
II. INSPECTIONS.

If responsive documents are more than 100 pages but less than eight linear feet in length, the response will indicate that the attachment is voluminous (“(V)”) and, pursuant to 16 TAC § 22.144(h)(2), the exhibit will be made available for inspection at SPS’s voluminous room at 919 Congress Avenue, Suite 2900, Austin, Texas 78701; telephone number (512) 721-2700. Voluminous exhibits will also be provided on Coffin Renner’s file sharing link.

If a response or the responsive documents are provided pursuant to the protective order in this docket, the response will indicate that it or the attachment is either Confidential (“CONF”) or Highly Sensitive (“HS”) as appropriate under the protective order. Access to Confidential and Highly Sensitive materials will be available on Coffin Renner’s file sharing link to all parties that have signed and filed the certification under the protective order entered in this docket. Confidential and Highly Sensitive responsive documents will also be made available for inspection at SPS’s voluminous room, unless they form a part of a response that exceeds eight linear feet in length; then they will be available at their usual repository in accordance with the following paragraph. Please call in advance for an appointment to ensure that there is sufficient space to accommodate your inspection.

If responsive documents exceed eight linear feet in length, the response will indicate that the attachment is subject to the FREIGHT CAR DOCTRINE, and, pursuant to 16 TAC § 22.144(h)(3), the attachment will be available for inspection at its usual repository, SPS's offices in Austin, Texas, unless otherwise indicated. SPS requests that parties wishing to inspect this material provide at least 48-hour notice of their intent by contacting Stephanie Tanner at Coffin Renner L.L.P., 1011 West 31st Street, Austin, Texas 78705; telephone number (512) 879-0900; facsimile transmission number (512) 879-0912; email address stephanie.tanner@crtxlaw.com. Inspections will be scheduled to accommodate all requests with as little inconvenience to the requesting party and to SPS's operations as possible.

Respectfully submitted,



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ATTORNEYS FOR
SOUTHWESTERN PUBLIC SERVICE COMPANY

RESPONSES

QUESTION NO. Staff 8-1:

What is the effect on any affected utility in the Southwest Power Pool if the proposed conversion is approved?

- a. What effect, if any, would the proposed conversion have on energy prices?
- b. What effect, if any, would the proposed conversion have on congestion charges?
- c. What effect, if any, would the proposed conversion have on reliability-must run designations of generation units?
- d. What effect, if any, would the proposed conversion have on satisfying reserve requirements?

RESPONSE:

As discussed in the direct testimony of SPS witness Mr. Mark Lytal at page 21, SPS does not anticipate that the project will have any impact on other utilities in Texas or in the proximate area of Harrington. It is not possible for SPS to evaluate the effect that converting the Harrington units will have on other utilities in the Southwest Power Pool in the categories referenced above. However, SPS anticipates the overall effect on other utilities in the Southwest Power Pool to be minimal. Put simply, the proposed conversion switches the Harrington units from coal to gas, however, the same amount of firm and dispatchable generation is available at the same location. Although, the switch from coal to gas will impact the cost and dispatch of the Harrington units, the overall impact to the Southwest Power Pool footprint is expected to be minimal, because the amount of firm and dispatchable generation is not changing. Furthermore, the proposed conversion will have no impact on other utilities planning reserve margins requirements, which are managed on a utility-by-utility basis. If the conversion is not approved, on the other hand, it is more likely that the categories referenced above could be negatively impacted as SPS may be forced to secure replacement resources for Harrington at a higher cost than conversion and will need to invest in voltage stabilization given the current voltage support provided by the Harrington units. As noted in the direct testimony of Ben Elsey and William A. Grant, if the conversion is not approved, SPS will fall below the Southwest Power Pool minimum reserve requirement of 12%.

Preparers: Jeffrey Haskins, Ashley Gibbons
Sponsors: Ben R. Elsey, William A. Grant, Mark Lytal

QUESTION NO. Staff 8-2:

Did SPS perform any study or analysis of the following Preliminary Order topics listed under # 17? If so, please provide the study and the conclusions.

RESPONSE:

Please refer to SPS's response to Question No. Staff 8-1.

Preparer: Ashley Gibbons

Sponsor: Ben R. Elsey

QUESTION NO. Staff 8-3:

Which testimony, filed in Docket 52485 by SPS, addresses any of these issues? Please cite exact records.

RESPONSE:


Please refer to SPS's response to Question No. Staff 8-1.

Preparer: Ben R. Elsey

Sponsor: Ben R. Elsey

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 March 14, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.



Mark A. Santos