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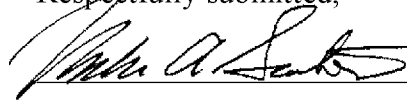
<b>APPLICATION OF SOUTHWESTERN PUBLIC SERVICE COMPANY TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY TO CONVERT HARRINGTON GENERATING STATION FROM COAL TO NATURAL GAS</b>	<b>§ § § § § § §</b>	<b>BEFORE THE STATE OFFICE   OF   ADMINISTRATIVE HEARINGS</b>
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**SOUTHWESTERN PUBLIC SERVICE COMPANY’S  
SECOND SET OF INTERROGATORIES AND SECOND REQUEST FOR  
PRODUCTION TO SIERRA CLUB**

Pursuant to 16 Texas Administrative Code (“TAC”) § 22.144 of the Commission’s Procedural Rules, Southwestern Public Service Company (“SPS”) requests that Sierra Club by and through their attorney of record, provide the following information and answer the following question(s) under oath. The questions shall be answered in sufficient detail to fully present all of the relevant facts. 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 and 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 questions 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.

Respectfully submitted,



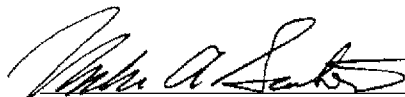
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ATTORNEYS FOR  
SOUTHWESTERN PUBLIC SERVICE COMPANY

**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 31, 2022, in accordance with the Order Suspending Rules, issued in Project No. 50664.

  
Mark A. Santos

## **GENERAL INSTRUCTIONS**

The following General Instructions apply to each of the requests set forth in this document:

1. Please provide all narrative responses in hard copy, on separate pages for each response, with the question restated at the top of the page. Where possible, please also provide responses via e-mail including all exhibits that are electronically available.
2. For each responsive answer, please identify the individual(s) responsible for its preparation, and the witness sponsoring the answer provided.
3. Unless otherwise indicated, the documents for which production is sought shall include all documents dated, prepared, sent, or received during the designated period or that relate to the designated period, whether prepared before, during, or after that period
4. If a discovery request can be answered in whole or in part by reference to the response to a preceding or subsequent discovery request, specify the preceding or subsequent discovery request by participant or party and by number, and state whether it is claimed that the response to the preceding or subsequent discovery request is a full response to the instant discovery request. If not, furnish the balance of the response needed to complete a full reply.
5. For any discovery request consisting of separate sub-divisions or related parts, a response is requested for each such part or portion with the same effect as if it were propounded as a separate discovery request. Any objection to such a discovery request should clearly indicate that part or portion of the discovery request to which the objection is directed.
6. For each document identified in a response that is computer generated, state separately (a) what types of data, files, disks or tapes are included in the input and the source thereof, (b) the form of the data which constitutes machine input (punch cards, tapes, disks, etc.), (c) a description of the recordation system employed (including program descriptions, flow charts, etc.), and (d) the identity of the person(s), during the designated period, in charge of the collection or input materials, the processing of input materials, the databases utilized, and/or the programming to obtain such output.
7. If a discovery request seeks information by year or years, indicate whether the information is provided on a calendar or fiscal year basis. If provided on a fiscal year basis, state the dates on which each fiscal year begins and ends.
8. In the event any document requested is unavailable, describe in detail the reasons the document is unavailable.
9. When producing documents pursuant to these discovery requests, designate on the document or group of documents the discovery request(s) in response to which the document(s) are produced.
10. If, in answering any of these requests, there is any ambiguity in interpreting either the request or a definition or instruction applied thereto, please contact:

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If that is not possible, set forth the language deemed to be ambiguous and the interpretation chosen or used in responding to the request.

11. These discovery requests are continuing in nature and require supplemental responses when further or different information with respect to any of them is obtained.
12. Use of the singular or plural word form in a discovery request is not to be interpreted to exclude information or documents from the scope or intent of the specific request.
13. The terms “and” and “or” shall be construed either disjunctively or conjunctively whenever appropriate in order to bring within the scope of these requests any information or documents which might otherwise be considered to be beyond their scope.
14. When requested to “state the basis” for any analysis (including studies and work papers), proposal, assertion, assumption, description, quantification or conclusion, describe every fact, statistic, inference, supposition, estimate, consideration, conclusion, study and analysis known to you or that you believe supports the analysis, proposal, assertion, assumption, description, quantification, or conclusion, or which you contend to be evidence of the truth or the accuracy of the analysis, proposal, assertion, assumption, description, quantification, or conclusion.
15. For each document furnished or answer provided in response to a discovery request, please identify the person(s) responsible (whether primarily or indirectly) for preparing and providing the response, the person(s) from whom information or documents were obtained and the files searched in responding to the discovery request, the person(s) who reviewed the response, and the person who would be available to respond to inquiries concerning the information provided (if different than the other identified people).
16. When a response to a discovery request comprises more than one page, please staple or bind the pages using consecutive numbers. Each response should be on a separate page(s).
17. For discovery requests specifically soliciting an answer rather than the production of documents, please provide an answer, supplemented, if need be, by the production of documents.
18. If information requested is not available in the form requested, please provide the information or documents as are available that best respond to the discovery request.
19. If any document covered by this request is withheld for whatever reason, please furnish a list identifying all withheld documents in the following manner:

- (a) the reason for withholding;
- (b) the date of the document;
- (c) a brief description of the document;
- (d) the name of each author or preparer;
- (e) the name of each person who received the document; and
- (f) a statement constituting the basis for withholding the document.

20. If you decline to respond to any request for information or data on the basis of privilege, please state as to each such request an explanation for the refusal. Identify those documents and communications that are withheld from the response to each specific discovery request. The identification shall be served within the time specified by the presiding examiner for this proceeding and in accordance with the Rules of the Commission, and shall:

- (a) specify the date of the document, its author(s) (with title and designation if an attorney), and recipients (with title and designation if an attorney);
- (b) contain a brief summary of the subject matter of the document; and
- (c) contain a brief statement of the reason that, in your opinion, the assertion of privilege is justified.

21. Please provide discovery responses as they become available.

### **DEFINITIONS**

The following definitions apply to each of the requests set forth in this document:

- 1. A reference to “SPS” or the “Company” shall mean Southwestern Public Service Company.
- 2. The term “Commission” refers to the Public Utility Commission of Texas.
- 3. 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, electronic mail (E-mail), modem transfers, and all memoranda or other documents concerning the requested item.
- 4. “Documents” refers to all writings and records of every type, including electronic media, memoranda, correspondence, reports (including drafts, preliminary, intermediate and final reports), surveys, studies (including, but not limited to, load flow, engineering, general economic and market studies), comparisons, tabulations, charts, books, pamphlets, photographs, maps, bulletins, minutes, notes, diaries, newspaper clippings, log sheets, ledgers, transcripts, microfilm, computer data files, tapes, inputs, outputs, and printouts, vouchers, accounting statements, engineering diagrams (including “one-line” diagrams), mechanical and electric recordings, telephone and telegraphic communication, speeches, and all other records, written, electrical, mechanical or otherwise.

“Documents” shall also refer to copies of documents, even though the originals of those documents are not in the possession, custody, or control of Sierra Club, including every copy of a document which contains handwritten or other notations or which otherwise does not duplicate the original or any other copy, and all attachments to any documents.

5. "Identification of" or "identify" 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 Sierra Club 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 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. "Please provide copies of all documents . . ." or similar phrases shall include the identification (see Definition No. 6) of all such documents as well as the production of all such documents.
9. "Relating to" or "referring to," when used in these requests, means a request for every document which comprises, reflects, discusses, underlies, comments upon, forms the basis for, analyzes, or mentions in any way the subject of the request.

**SECOND SET OF INTERROGATORIES AND**  
**SECOND REQUEST FOR PRODUCTION**

**SPS REQUEST NO. 2-1:** Refer to page 49, lines 13 – 16 of Ms. Glick’s Direct Testimony. Why did Ms. Glick and/or Synapse “not allow the model to build any new gas projects prior to 2030 in any scenarios”?

**SPS REQUEST NO. 2-2:** Refer to page 49, lines 13 – 16 of Ms. Glick’s Direct Testimony. Did Ms. Glick (or anyone on her team from Synapse or otherwise) conduct any analysis that included new gas projects prior to 2030?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

**SPS REQUEST NO. 2-3:** Refer to page 49, lines 13 – 16 of Ms. Glick’s Direct Testimony. Did Ms. Glick (or anyone on her team from Synapse or otherwise) conduct any analysis that included replacing Harrington unit 1 with new gas generation?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

**SPS REQUEST NO. 2-4:** Did Sierra Club conduct any analysis in which battery energy storage resources will receive less than 100% accreditation after Southwest Power Pool implements the effective load carrying capability methodology in 2023?

- a. If yes, please provide all the analysis (EnCompass files, Excel files, or information in any other format).
- b. If no, please explain why not.

**SPS REQUEST NO. 2-5:** Provide all workpapers and any other supporting analysis for all tables in Ms. Glick’s direct testimony, whether those tables are the result of EnCompass modeling results or analysis conducted outside of EnCompass.

**SPS REQUEST NO. 2-6:** Confirm that in response to SPS RFI 1-5, Sierra Club has provided SPS with all Synapse modeling files in relation to Harrington Generation Station since February 15, 2022. If deny, please provide any and all remaining Synapse modeling files.

**SPS REQUEST NO. 2-7:** Confirm that in response to SPS RFI 1-5, Sierra Club has provided SPS with all modeling-related files, including any and all Excel files or other types of files created outside of EnCompass, in relation to Harrington Generation Station since February 15, 2022. If deny, please provide any and all remaining Synapse modeling files.